IN RE:	ALL ASBESTOS-RELATED PERSONAL INJURY OR DEATH CASES FILED OR TO BE FILED IN DALLAS COUNTY, TEXAS	§ § § § §	IN THE DISTRICT COURTS OF DALLAS COUNTY, TEXAS 160TH JUDICIAL DISTRICT

DEFENDANT CROWN CORK & SEAL COMPANY, INC., ANSWERS TO PLAINTIFFS' AMENDED MASTER INTERROGATORY NO. 63 AND ADDITIONAL INTERROGATORY NO. 64 PROPOUNDED TO DEFENDANTS

TO: PLAINTIFFS, by and through their counsel of record, Russell W. Budd, Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

Pursuant to Rule 168 of the Texas Rules of Civil Procedure, these responses are hereby made by the Defendant, Crown Cork & Seal Company, Inc., in response to the Interrogatories made by Plaintiffs.

INTERROGATORIES

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

a. Identify the name and position of the employee or officer who received same;

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PLAINTIFF'S EXHIBIT KCS-18

b. please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;

c. please produce all documents upon which your responses above are based;

d. please identify the name(s) and address(es) of any person(s) who can verify your above response;

e. did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;

f. if so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63 (a) above;

g. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Fleischer-Drinker report in whole or in part for the proposition stated in 63(e) above?

ANSWER: Crown Cork & Seal has never received this article.

INTERROGATORY NO. 64:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U.S. Public Health Service and authored by W. C. Dreessen ("the Dreessen Report")?

a. Identify the name and position of the employee or officer who received same;

b. please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;

c. please produce all documents upon which your responses above are based;

d. please identify the name(s) and address(es) of any person(s) who can verify your above response;

e. did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;

f. if so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;

g. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Dreessen report in whole or in part for the proposition stated in 63(e) above?

ANSWER: Crown Cork & Seal Company, Inc., has never received a copy of this article.

Respectfully submitted,

FOLEY & BOYD, P.C.

BY: _____

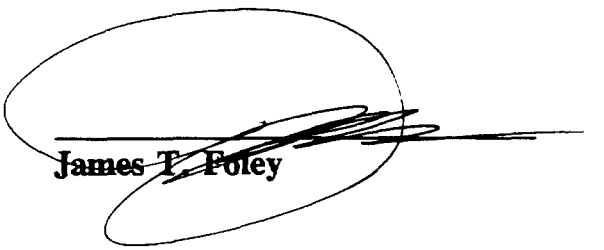
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ATTORNEY FOR DEFENDANT, CROWN CORK & SEAL COMPANY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on Plaintiff's counsel of record, by Certificate Return Receipt Requested United States Mail on this the 21st day of May, 1992.



James T. Foley

STATE OF PENNSYLVANIA §
§
COUNTY OF PHILADELPHIA §

BEFORE ME, the undersigned authority, on this day personally appeared RICHARD L. KRZYZANOWSKI, who, being by me duly sworn, on oath states that he is the Secretary of Crown Cork & Seal Company, Inc.; that he has the authority to make this affidavit; and that he has read the above and foregoing Defendant Crown Cork & Seal Company, Inc.'s Answers to Plaintiffs' First Set of Interrogatories, and that said answers are true and correct.

Richard L. Krzyzanowski
RICHARD L. KRZYZANOWSKI
Affiant

SUBSCRIBED AND SWORN TO before me by the said RICHARD L. KRZYZANOWSKI, Secretary of Crown Cork & Seal Company, Inc., on this the 18th day of May, 1992, to certify which witness my hand and official seal of office.

Matthew P. Hardi
NOTARY PUBLIC IN AND FOR THE STATE OF PENNSYLVANIA

MY COMMISSION EXPIRES: 2/13/95

NOTARIAL SEAL
MATTHEW P. HARDI, Notary Public
PHILADELPHIA, PHILADELPHIA COUNTY
My Commission Expires February 13, 1995