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**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY**

IN RE: ASBESTOS LITIGATION : C.A. No. 77C-ASB-2

**NOTICE OF SERVICE OF
DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S
STANDARD ANSWERS TO STANDING ORDER NO. 1
INTERROGATORIES AS MANDATED BY PARAGRAPH 11 OF
STANDING ORDER NO. 1 AS AMENDED ON DECEMBER 21, 2007**

PLEASE TAKE NOTICE that on this 17th day of June 2008, in compliance with the provisions of Paragraph 11 of Standing Order No. 1 as Amended on December 21, 2007, the undersigned counsel for Graybar Electric Company, Inc., did deposit with Rufo Associates, P.A., as Defense Coordinating Counsel, its Standard Answers to Standing Order No. 1 Interrogatories.

BODELL, BOVÉ, GRACE & VAN HORN, P.C.

/s/ Bruce W. McCullough
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Dated: June 17, 2008

**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY**

IN RE: ASBESTOS LITIGATION : C.A. No. 77C-ASB-2

**DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S
RESPONSE TO STANDING ORDER NO. 1 INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO ALL DEFENDANTS**

Defendant, Graybar Electric Company, Inc., (hereinafter "Graybar") for its Answers to Plaintiff's Interrogatories says:

GENERAL OBJECTIONS

Graybar objects to Plaintiff's Interrogatories and Requests for Production of Documents on the basis that they are overly broad, unduly burdensome, and seek to impose a burden upon Graybar, which exceeds the permissible scope of discovery under the Delaware Rules of Civil Procedure. Graybar further objects on the basis that these discovery requests seek to impose a continuing duty on Graybar, which is contrary to the scope of discovery, permitted under the Delaware Rules of Civil Procedure.

Graybar also objects to these interrogatories and requests for production to the extent that they seek information or materials which have been gathered or prepared in the course of the asbestos litigation, or which are otherwise protected by the attorney-client privilege, the work product doctrine, or by any other applicable privilege. Graybar also objects to these interrogatories and requests for production to the extent that they seek confidential or trade secret information or materials.

Graybar objects to requests that are directed toward information and specifications about products not supplied or produced by this answering defendant.

Graybar objects to any request that assumes or suggests that Graybar manufactured "asbestos products", or sold or distributed "asbestos." Graybar did not manufacture "asbestos products" and did not sell or distribute "asbestos."

Graybar objects to these interrogatories and requests for production to the extent that they seek to require it to respond other than in accordance with the applicable Delaware rules. Thus, Graybar declines any obligation to (a) locate or interview former employees or any other person not presently employed or engaged by Graybar; (b) generate documents not presently existing; (c) describe its unsuccessful efforts to answer any question; (d) identify any unknown custodian or the current custodian of documents not in Graybar's possession; (e) identify the file designation and other identifying designation, the present location, or the source of documents identified unless specifically requested; (f) add to or change the meaning of any request in the conjunctive or disjunctive; (g) respond to any aspect of any request not described with reasonable particularity by the express language of the request; or (h) provide medical or other expert opinion beyond the scope of Graybar's business.

Graybar objects to these requests to the extent that they seek to require Graybar to respond on behalf of any other person or entity. All answers are made solely by and on behalf of Graybar Electric Company, Inc. and not on behalf of other entity or person.

Graybar objects to these requests to the extent that they seek to require it to provide information or to identify any documents or other tangible things prepared or obtained in anticipation of litigation or for trial where the plaintiffs have not shown that they (a) have

substantial need for the materials in the preparation of the case; and (b) are unable to obtain the substantial equivalent of the materials by other means without undue hardship. Graybar objects to these requests to the extent that they seek to require it to gather and summarize information contained in voluminous papers that are all a matter of public record.

Graybar objects to these requests to the extent that they seek to require it to provide information equally available to the Plaintiff as to Graybar.

Graybar hereby reserves the right to supplement its responses pending further discovery in this action. Graybar does not concede that any of its answers to these requests are, or will be, admissible evidence at a trial of this action, and Graybar does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

These general objections and reservations are explicitly made a part of and incorporated by reference in each response hereinafter provided.

RESPONSES TO INTERROGATORIES

1. Describe in detail, with specificity and particularity each product mined, produced, manufactured or sold by the answering defendant or its predecessors in title or subsidiaries which contained asbestos for each year from 1936 until 1980; and for each such product describe:

- (a) Its chemical ingredients;
- (b) State the manner in which it was intended to be used, i.e., in the construction and/or insulation of buildings and/or equipment, etc.;
- (c) For each ingredient contained therein state:
 - (i) The name or chemical composition of each substance, what harmful effect, if any are known, that it produces in man or mammals and whether it produces its harmful effects through ingestion, inhalation, absorption or a combination of these;
 - (ii) When you determined and/or learned that the substance produced harmful effects and how such effects were produced;

(iii) Identify each individual who participated in such determination and/or obtained such knowledge;

(iv) Identify each document that refers, reflects or relates to any information pertaining to the properties of each of the ingredients and/or how the harmful effects are produced as well as your determination of those toxic effects and the manner by which they are produced;

(v) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied;

(vi) Which products or ingredients were mined, which were manufactured and which were distributed by answering defendants.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: Graybar sold and distributed some asbestos containing products from 1926 until the mid 1980s which were manufactured by other entities. Those products are listed in Graybar catalogs identified as follows. These archival, fragile, one-of-a-kind catalogs are available for review at Graybar's corporate offices upon reasonable notice by contacting Graybar's counsel.

Catalog Number	Year of Issue	Number of Pages
101	1934	735
102	1941	1072
103	1948	1116
104	1952	1352
105	1958	1628
106	1967	1116
61	1961	214
62	1962	232
63	1963	236
25	1965	270
26	1966	242
27	1967	238
28	1969	256
29	1970	248
30	1971	248
31	1972	248
32	1973	238
33	1974	254
34	1975	240

35	1977	276
36	1979	326

Because Graybar did not mine asbestos and did not manufacture the asbestos containing products that it sold, Graybar is unable to respond the portions of this interrogatory which request information about product ingredients, percentages and types of asbestos contained. Because Graybar did not participate in the packaging of these products, and has not retained any product packaging, Graybar is unable to respond to the portions of this interrogatory which request information about the packaging of those products. As a distributor of products, Graybar is unable to respond to the portion of the interrogatory which requests information regarding the "intended use" of the products.

2. If any product identified in answer to Interrogatory No. 1 was produced, manufactured and/or sold under a trade name, identify that trade name(s) and state the time period that each such product was sold under such trade name.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

3. For each product identified in answer to Interrogatory No. 1, state:

- (a) The address of each plant where it was manufactured, processed or packaged;
- (b) Whether you were the sole producer, manufacturer and/or distributor of the product and, if not:
 - (i) The name and address of each other person, firm or other entity engaged in the production, manufacture and/or distribution of the product;
 - (ii) Whether any other manufacturer produced the product by virtue of a franchise or license from you;
 - (iii) The persons or firms who produced the product for distribution in the United States;
 - (iv) The person or firms who produced the product for distribution in the State of Delaware.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

4. For each product identified in answer to Interrogatory No. 1 state:
- (a) How the product was sold and/or distributed for use in the United States and/or the State of Delaware;
 - (b) Identify all persons, firms or other entities to whom these products were sold or through whom they were distributed during the period 1936 to 1980;
 - (c) For each person, firm or other entity identified in answer to subpart (b) above, state the following:
 - (i) the specific product sold and/or distributed;
 - (ii) the quantity of the product sold and/or distributed;
 - (iii) the dates which these products were sold; shipped and delivered to each entity;
 - (iv) Identify each individual who has any knowledge of these sales and/or distribution and state with specificity and particularity the substance of each individual's knowledge;
 - (v) Identify and produce all documents which refer, reflect or relate to all sales and/or distribution of each such product to each such entity identified above.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

5. For each product identified in answer to Interrogatory No. 1 state whether you engaged in any advertising program to promote the sale of that product and, if so state:
- (a) The name or description of each advertising media that you have used to promote the product during the period 1936 to 1980;
 - (b) The name of each national magazine or periodical in which you have advertised the product during the period 1936 to 1980;
 - (c) The date of each issue of such magazine or periodical in which such advertisement appeared;
 - (d) The name and address of each newspaper in which it advertised the product during the period 1936 through 1980;
 - (e) The date of each publication of each newspaper in which the advertisement appeared;
 - (f) Identify and produce each document which refers, reflects or pertains to each such advertisement which was published in each such magazine, periodical and/or newspaper;
 - (g) State whether the advertising of the product was handled by an agency and, if so, state the name and address of each advertising agency that handled any portion of the advertising of the product during the period 1936 through 1980.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative,

compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging from that time period. See response to interrogatory number 1.

6. For each product identified in answer to Interrogatory No. 1 which was distributed to a company that used said products in Delaware or was a distributor of said product for an area including Delaware, state:

- (a) The name and address of the company;
- (b) Whether the asbestos contained tremolite, crocidolite, chrysotile, amosite and/or anthophyllite asbestos and state the amount in terms of the percentage of the total asbestos contained in the product;
- (c) The total amount of asbestos contained in the product;
- (d) The exact formulation of the product including the other non-asbestos ingredients thereof;
- (e) The name and address of each individual who participated in the formulation of such product;
- (f) The identity of each document which refers, reflects or relates to any information provided in the answer to this Interrogatory;
- (g) The names and addresses of the persons usually communicated with when dealing with said company;
- (h) Identify the living individual most knowledgeable about the answers given in 6(b), (c) and (d);
- (i) Identify the living individual most knowledgeable about distribution of the above products in Delaware and in an area of which Delaware was a part.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1. GRAYBAR further responds that according to its records retention policy, it would no longer have any sales records for any products that it would have distributed prior to and including 1980.

7. With regard to each form of asbestos fibers identified in the answer to Interrogatory 6, state:

- (a) Where it was purchased, if it was not purchased, where it was obtained;
- (b) From whom it was purchased;
- (c) The manner in which it was received, stored and used in the production of the product.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory numbers 1 and 6.

8. If you manufacture any insulation products which are commonly used by insulators and which contain asbestos:

(a) Describe how the products listed in (b) are cut, shaped, mixed and applied on the jobs giving particular reference as to whether or not the materials have to be sawed or cut on the job, blown into confined areas, or mixed with water into a cement or paste;

(b) State if there is any way known to you that the products listed below can be used and applied without the worker inhaling any of the asbestos dust or fibers:

- (i) Asbestos cement, Asbestos Finishes;
- (ii) Asbestos pipe covering;
- (iii) Asbestos bricks or block;
- (iv) Asbestos sheeting;
- (v) Asbestos insulation used to cover extremes of heat as well as cold;
- (vi) Asbestos insulation in loose form which may be blown into homes

or buildings;

- (vii) Asbestos in spray form;
- (viii) Asbestos mineral in fiber form or particulate form;
- (ix) Asbestos Millboard, rope, gaskets, paper gloves or blanket;

(c) Did your company buy any products listed in (b) above from other manufacturers and relabel it or have it labeled for your company?

(1) If yes, which products and from whom;

(d) Did your company produce any products within the list in (b) above for other companies?

(1) If yes, which products and for whom;

(e) Whether prior to distributing the product you repackaged or in any altered the packaging or labelling of the product after receiving it from the source, and if so what alterations were made by you.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

9. For each product listed in answer to Interrogatory No.1, describe each end use for which each such product was intended to be used by the general industry and for each such use:

- (a) Describe the form of the product when so used;
- (b) Describe the process and/or method by which the product would be applied

for each such use;

- (c) Describe the equipment to be used to apply the product for each such use;
- (d) Identify each document that refers, reflects or relates to any information and state the full substance of the information supplied.
- (e) As to any information received orally in answer to any Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, not limited as to time or scope, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

10. State whether any of the equipment identified in answer to Interrogatory No. 9(c) was manufactured by you or any parent or subsidiary company or related company.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

11. If any piece of equipment identified in answer to Interrogatory No. 9 (c) was invented, developed or first made by you or nay person associated with you or any related company or association, state:

- (a) When it was invented, developed or made;
- (b) The identity of each individual who participated therein and describe in detail the extent of his participation;
- (c) The identify of each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (d) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

12. State whether you or any person associated with you or any related company or

association invented, developed or made any change and/or improvement in any piece of equipment identified in answer to Interrogatory No. 9(c), and if so:

- (a) Describe the change and/or improvement made;
- (b) State when it was made;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who has supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

13. For each process and/or method identified in answer to Interrogatory No. 9(b), state whether it was developed by you or a parent or subsidiary or related company.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

14. For each process and/or method identified in answer to Interrogatory No. 9 (b) developed or first made by you or any person associated with you or any related company or association, state:

- (a) When and where it was developed;
- (b) The identity of each individual who participated therein and describe in detail the extent of his participation;
- (c) The identity of each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (d) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants.

Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

15. State whether you or any person associated with you or any related company or association developed or made any change and/or improvement in any process and/or method identified in answer to Interrogatory No. 9(b), and if so:

- (a) Describe the change and/or improvement made;
- (b) State when and where it was made;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this Interrogatory.
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.
- (f) Identify the living person who has the most knowledge of matters discussed herein.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

16. For each product identified in the answer to Interrogatory No. 1, describe what, if any, tests were made to determine the safety of said product and:

- (a) State when and where such test was made;
- (b) Describe the results of each such test;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds that it did not test the asbestos-containing products it distributed which were manufactured by others.

17. For each process or method identified in answer to Interrogatory No. 9(b), describe what, if any, tests were made to determine the safety of said process or method and:

- (a) State when and where each such test was made;
- (b) Describe the results of each such test;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

18. For each piece of equipment identified in answer to Interrogatory No. 9(c), describe what, if any tests were made to determine the safety of said equipment and:

- (a) State when and where each such test was made;
- (b) Describe the results of each such test;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

19. For each label, brochure, or other written material describing or relating to the use of each product identified in answer to Interrogatory No. 1, produced by you or any person associated with you or any related company or association:

- (a) Describe its contents;
- (b) State when, where, how, and to whom it was distributed;

- (c) State the manner in which it was placed on or in the product container or whether it was separate from the product or container;
- (d) State whether any written, printed or graphic matter was present to warn or any harmful ingredient it might contain. If so, state:
 - (i) Whether a signal word, i.e., "danger", "warning" or "caution" was present;
 - (ii) Whether the signal word was printed in boldface, capital letters or different colored inks. Which?
 - (iii) The wording of all directions and/or instructions pertaining to any method of use to avoid any hazard;
- (e) Identify each individual who participated in the writing of the label, brochure or other written materials and describe in detail the extent of his participation;
- (f) Identify each document which reflects, refers or relates to the information contained on the labels, brochures, or other written materials and/or the decision to include such information;
- (g) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging from that time period. See response to interrogatory numbers 1 and 5.

20. For each product identified in answer to Interrogatory No. 1, state whether warnings of any harmful or potentially harmful effects of the product were printed on the cartons or packing cases in which individual containers were packed and, if so:
- (a) State the printed warning's contents;
 - (b) State when the warning was used;
 - (c) Describe the manner in which it was placed on or in the product container;
 - (d) Identify each individual who participated in the writing of the label or brochure and describe in detail the extent of his participation;
 - (e) Identify each document which reflects, refers or relates to the information contained on the cartons or packing cases and the decision to include that information;
 - (f) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative,

compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging from that time period. See response to interrogatory numbers 1 and 5.

21. For each label, brochure, or other written material describing or relating to each process or method identified in answer to Interrogatory No. 9(b) produced by you or any person associated with you or any related company or association, for each such label, brochure or written material:

- (a) Describe its contents;
- (b) State when, where, how and to whom it was distributed;
- (c) State whether any written, printed or graphic matter was present to warn of any harmful ingredient it might contain. If so, state:
 - (i) Whether a signal word, i.e., "danger", "warning" or "caution" was present;
 - (ii) Whether the signal word was printed in boldface, capital letters or different colored inks. Which?
 - (iii) The wording of all directions and/or instructions pertaining to any method of use to avoid any hazard;
- (d) Identify each individual who participated in the writing of the label, brochure or other written materials and describe in detail the extent of his participation;
- (e) Identify each document which reflects, refers or relates to the information contained on the labels, brochures, or other written materials and/or the decision to include such information;
- (f) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

22. For each label, brochure or other written material describing or relating to equipment identified in answer to Interrogatory No. 9 (c) , produced by you or any person associated with you or any related company or association; and for each such label, brochure or written material:

- (a) Describe its contents;

- (b) State when, where, how and to whom it was distributed; or other written material describing or relating to equipment identified in answer
- (c) State whether any written, printed or graphic matter was present to warn of any harmful ingredient it might contain. If so, state:
- (i) Whether a signal word, i.e., "danger", "warning" or "caution" was present;
- (ii) Whether the signal word was printed in boldface, capital letters or different colored inks and if so, which one
- (iii) The wording of the statements describing any hazard;
- (iv) The wording of all directions and/or instructions pertaining to any method of use to avoid any hazard;
- (d) The identity of each individual who participated in the writing to the label, brochure or other written materials and describe in detail the extent of his participation;
- (e) The identity of each document which reflects, refers or relates to the information contained on the labels, brochures, or other written materials and/or the decision to include such information;
- (f) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party.

23. With regard to the production, distribution and/or sale of each product identified in answer to Interrogatory 1, state whether you have ever been accused of violating any of the provisions of the Federal Labeling of Hazardous Substances Act, and, if so, state:

- (a) The date of each indictment, complaint or information that accused you of such violation;
- (b) The court in which the proceedings were instituted;
- (c) The plea you entered;
- (d) The verdict and/or judgment in each such case;
- (e) The date set for trial of any pending case;
- (f) Identify each document which reflects, refers or relates to the information contained on the labels, brochures, or other written materials and/or the decision to include such information;
- (g) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: No. See also response to interrogatory number 1.

24. For each product identified in answer to Interrogatory No. 1, state whether you contend it is a "hazardous substance" as defined in 15 United States Code, §1261(f) and, if so, state with specificity and particularity the facts on which you rely to support that contention.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence, requires expert opinion, and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: No. See also response to interrogatory number 1.

25. With regard to the product identified in answer to Interrogatory No. 1, state whether any quantity of that product has ever been seized by any agency of any government; and if so:

- (a) State the date of each such occurrence;
- (b) State the name or description of the violations of which you were accused;
- (c) State the court in which the action was filed;
- (d) Describe the judgment that was rendered;
- (e) State the date that has been set for trial of any pending case;
- (f) Identify each document which reflects, refers or relates to information pertaining to such seizure;
- (g) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds that it has no knowledge that any asbestos containing product it distributed was ever seized by any agency of any government.

26. State whether you have ever been the subject of any investigation or accusation by any Governmental Agency concerning the provisions of the Occupational Safety and Health Act of 1970 (P.L. 91-596, 29 U.S.C. §641, et seq.) If so, state:

- (a) The date of such investigation, accusation or other administrative or

judicial procedure or action;

(b) The administrative agency or court in which any proceedings arising from such investigation or accusation was heard or instituted;

(c) The determination and results of any such accusation or action;

(d) The identity of each document which refers or relates to information set forth in answer to this Interrogatory;

(e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds: No.

27. State what action, if any, you have taken since 1935 to reduce or eliminate any risk of occupational disease or personal injury to those engaged in the manufacture of your asbestos products or to those using your asbestos products which arises from the inhalation of dust and fibers.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this responding party. See also response to interrogatory number 1.

28. Describe in full and complete detail each of the activities which you have undertaken with the intention of warning the public of the effects of any product identified in answer to Interrogatory No. 1 as to the health of the user or general public and give the inclusive dates of each such activity, and;

(a) Identify each individual who participated therein and describe the nature of his participation;

(b) Identify each document which reflects, refers or relates to information pertaining to such warning;

(c) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Not applicable to this

responding party. See also response to interrogatory numbers 1 and 5.

29. Have you or any of your companies conducted any studies concerning the effects of inhalation of asbestos dust or fibers by one using or being exposed to any of the asbestos materials manufactured by your and/or any of your companies? In answer to this question, please state:

- (a) The date, nature and location of your studies;
- (b) The name or names of the persons conducting the studies and their address and describe in detail the extent of their participation;
- (c) The purpose of the studies;
- (d) The identity of each document which refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds that it does not manufacture any asbestos-containing products or materials and has never conducted such studies.

30. Have you or any of your companies conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of any of the products containing asbestos materials manufactured by you or any of your companies? If so:

- (a) The date, nature and location of your studies;
- (b) The name or names of the persons conducting such studies and their addresses and describe in detail the extent of their participation;
- (c) State what action, if any, was taken based upon such studies in an effort to minimize or eliminate the effects of inhalation of asbestos dust or fibers upon those using or being exposed to the dust and fibers contained in such products as manufactured by your company;
- (d) Identify each document which refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants.

Without waiving these objections, Graybar responds that it does not manufacture any asbestos-containing products or materials and has never conducted such studies.

31. What technique, if any, did and/or do you use to make dust samplings in the manufacturing and packaging production environment or at job sites where your materials are used?

- (a) Set forth in detail the technique used, when it was commenced and when, if ever, it was concluded;
- (b) State the purpose of administering such samplings;
- (c) State the results of such samplings;
- (d) State what action, if any, has been taken in response to the findings as to the dust samples;
- (e) Identify each document which refers or relates to such sampling;
- (f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds that it does not manufacture any asbestos-containing products or materials and has never conducted such samplings.

32. State what, if any safety measures were taken by you as to your employees, during the processing, manufacturing and packaging of products containing asbestos including but not limited to products that have been distributed to the DuPont Company. If any such safety measures were taken, state:

- (a) The reason for the use of such measures, equipment or clothing;
- (b) Identify each document relating to safety procedures taken by employees or plant personnel in the manufacture, processing and packaging of such products;
- (c) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products. Graybar has not retained any product packaging provided by the manufacturers from that time period. Pursuant to Graybar's records retention policy, it no longer has records of sales of any product which may have contained asbestos which it may have

distributed prior to the mid 1980s. See response to interrogatory numbers 1 and 6.

33. Have you or anyone on your behalf conducted or had conducted any investigation of the statistical and/or epidemiological relationship between the use of any product identified in answer to Interrogatory No. 1 and the contraction by humans or animals of cancer including but not limited to mesothelioma. If so:

- (a) Identify each person participating in such investigation and describe in detail the extent of this participation;
- (b) State when the investigation was conducted;
- (c) Identify the person or persons who authorized the investigation;
- (d) Identify each document which refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Graybar further objects that this request seeks information protected by the attorney client privilege or attorney work product doctrine. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds as follows: Graybar, in the normal course of business, has never conducted any investigation of the statistical and/or epidemiological relationship as described as to any asbestos containing materials that it distributed. To the extent that Graybar is aware that any such products may have been subjected to such investigation those investigations were conducted in the response to and in connection with asbestos personal injury litigation.

34. Have you or anyone of your behalf conducted or had conducted any investigation of the statistical and/or epidemiological relationship between the use of any product identified in answer to Interrogatory No. 1 and the contraction by humans of pulmonary asbestosis. If so:

- (a) Identify each person participating in such investigation and describe in detail the extent of his participation;
- (b) State when the investigation was conducted;
- (c) Identify the person or persons who authorized the investigation;
- (d) identify each document which refers or relates to any information set forth in answer to this Interrogatory;
- (e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound,

vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Graybar further objects that this request seeks information protected by the attorney client privilege or attorney work product doctrine. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds as follows: Graybar, in the normal course of business, has never conducted any investigation of the statistical and/or epidemiological relationship as described as to any asbestos containing materials that it distributed. To the extent that Graybar is aware that any such products may have been subjected to such investigation those investigations were conducted in the response to and in connection with asbestos personal injury litigation.

35. Describe in detail all written and oral reports including those reports originating from users of any of the products identified in answer to Interrogatory No. 1, including doctors and employees and agents of the defendants concerning any relationship between the use of these products and the development of pulmonary asbestosis in humans or animals;

- (a) Identify all persons making said reports and to whom said reports were made;
- (b) State whether any report or series of reports initiated changes and/or reevaluation of the production, sale or use, or recommendations for use, of any of those products;
- (c) Identify each document which refers or relates to any information set forth in answer to this Interrogatory;
- (d) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, and overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Graybar further objects that this request seeks information protected by the attorney client privilege or attorney work product doctrine. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds that to the extent Graybar would have been aware of any such reports, those reports were in connection with asbestos personal injury litigation.

36. Describe in detail all written and oral reports including those reports originating from users of any of the products identified in answer to Interrogatory No. 1, including doctors, employees and agents of the defendants concerning any relationship between the use of those products and the development of cancer including, but not limited to mesothelioma in humans and animals:

- (a) Identify all persons making said reports and to whom said reports were made;
- (b) State whether any report or series of reports initiated changes and/or reevaluation of the production, sale or use, or recommendations for use, of any of those products;
- (c) Identify each document which refers or relates to any information set forth

in answer to this Interrogatory;

(d) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, vague, unintelligible, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Graybar further objects that this request seeks information protected by the attorney client privilege or attorney work product doctrine. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds that to the extent Graybar would have been aware of any such reports, those reports were in connection with asbestos personal injury litigation.

37. For each product identified in answer to Interrogatory No. 1, state whether the production and/or sale of the product has been discontinued and, if so:

(a) State when it was discontinued;

(b) State with specificity and particularity all the reasons for the discontinuance;

Identify each individual who participated in the decision to discontinue production and/or sale and describe in detail the extent of his participation;

Identify all documents which reflect, refer or relate to each such discontinuance;

(e) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar is a distributor and did not manufacture asbestos-containing products. To the extent that manufacturers removed asbestos from their products, the manufacturer would have made that decision. See response to interrogatory number 1.

38. For each product identified in answer to Interrogatory No. 1, state whether the production and/or sale of that product has been limited and/or curtailed or reduced and, if so:

(a) Describe how it was so limited or curtailed or reduced;

(b) State when it was so limited, curtailed or reduced;

(c) Identify each individual who participated and the extent of his participation in the decision to so limit, curtail or reduce production and/or sale;

(d) identify each document which reflects, refers or relates to the limitation, curtailment or reduction and/or the decision to implement the limitation, curtailment or reduction;

(e) Identify each document which reflects, refers or relates to the limitation,

curtailment or reduction;

(f) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar is a distributor and did not manufacture asbestos-containing products. To the extent that any asbestos-containing product was limited and/or curtailed or reduced, the manufacturer would have made that decision. See response to interrogatory number 1.

39. Do you contend that each of the products identified in Interrogatory No. 1. do not or did not create any risks to one who applies or uses the product?

(a) If so, state the factual basis for each such contention;

(b) If not, state:

(i) The degree and kind of risk which is created by such use;

(ii) The conditions under which such risk is created, increased or decreased;

(iii) Identify each document which reflects, refers or relates to your answers to this Interrogatory;

(iv) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence, requires expert opinion and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "risks" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos-containing products. Graybar has not retained any product packaging provided by the manufacturer from that time period. Responding party would not have knowledge as to how any product was used after sold. See response to interrogatory number 1.

40. Do you contend that it was not your responsibility to warn workers of the risk of harm arising from the use of your product or of the danger of asbestos to their health?

(a) State the factual basis for such responses;

(b) Identify each document which reflects, refers or relates to your answers to this Interrogatory;

(c) As to any information received orally in answer to this interrogatory,

identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "risk of harm" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Yes. Graybar did not manufacture asbestos-containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

41. Do you contend that it was only the responsibility of the employing company involved, or others, to so warn the workers of the risk of harm arising from the use of your product or of the danger of asbestos to their health?

- (a) State the basis for such contention;
- (b) Identify which others were so responsible;
- (c) Identify each documents which reflects, refers or relates to your answer to this Interrogatory;
- (d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "risk of harm" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos-containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

42. Do you contend that the danger to any plaintiff was not foreseeable at the time the products alleged to have caused his injuries were sold? If so, as to each plaintiff:

- (a) State the factual basis for such contention;
- (b) Identify each document relied upon in support of such contention;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "danger" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

43. Do you contend that the danger from the use by plaintiffs of products containing asbestos was obvious? If so, as to each plaintiff:

- (a) State the factual basis for such contention;
- (b) Identify each document relied upon in support of such contention;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "danger" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Graybar did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

44. Do you contend that plaintiffs knew, understood and appreciated the danger arising from their contact with asbestos which you mined or distributed or products containing asbestos which you manufactured or distributed? If so, as to each plaintiff:

- (a) State the factual basis for such contention;
- (b) Identify each document relied upon in support of such contention;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "danger"

as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Unknown as to individual plaintiffs. Graybar did not mine asbestos, did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

45. Do you contend that plaintiffs voluntarily and unreasonably exposed themselves to the danger arising from their contact with asbestos which you mined or distributed or products containing asbestos which you manufactured or distributed? If so, as to each plaintiff:

- (a) State the factual basis for such contention;
- (b) Identify each document relied upon in support of such contention;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Responding party further objects to the term "danger" as over broad and vague. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Unknown as to individual plaintiffs. Graybar did not mine asbestos, did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

46. Do you contend that plaintiffs used any asbestos which you mined or distributed or any products containing asbestos which you manufactured or distributed in other than their usual customary and expected manner? If so, as to each plaintiff:

- (a) State the name and chemical composition of the product claimed to have been used in other than its usual, customary and expected manner;
- (b) State in detail the manner in which plaintiffs used said product in other than its usual, customary and expected manner;
- (c) Identify each document relied upon in support of such contention;
- (d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, requires expert opinion, assumes facts not in evidence and seeks

information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing defendants. Without waiving these objections, Graybar responds as follows: Unknown as to individual plaintiffs. Graybar did not mine asbestos, did not manufacture asbestos containing products and did not participate in the generation of any literature which may have accompanied the products it sold. Graybar has not retained any product packaging provided by the manufacturer from that time period. See response to interrogatory number 1.

47. With regard to each product identified in answer to Interrogatory Nos. 1 or 8, state whether you have ever been named as a defendant in any other civil action, including Workmen's Compensation Actions, filing of Workmen's Compensation consent agreements, or other proceedings, to recover damages for injuries resulting from asbestosis and asbestos related pleural disease received as a result of using that product and, if so, for each proceeding:

- (a) State the name and address of each plaintiff;
- (b) State the name and address of each co-defendant;
- (c) State the date it was filed;
- (d) State the name of the Court in which it was filed;
- (e) Describe the judgment rendered;
- (f) State the date that has been set for trial of any case still pending;
- (g) Describe the terms of any settlement reached before or during trial;
- (h) State whether any appeal is pending from any judgment that has been rendered;
- (i) State the exact nature of the condition alleged in such action to have resulted from the plaintiffs' use of or contact with said product and identify the produce involved;
- (j) Identify each document which reflects, refers or relates to any information pertaining to that complaint.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, and seeks information irrelevant to plaintiff's claims. Without waiving said objections and subject to same, responding Graybar responds that it has never been named in a worker's compensation action involving alleged asbestos-related exposure. Graybar has been named in civil litigations involving alleged asbestos-related exposure from alleged use of products manufactured by others and distributed by Graybar beginning in 1985. Information regarding those claims are equally available to plaintiff.

48. With regard to each product identified in answer to Interrogatory No. 1 and 8, state whether you have ever received a notice of injury to any other person as a consequence of a condition of asbestosis, asbestos related pleural disease and cancer resulting from the use of that product and, if so,

- (a) State the date it was received;

- (b) State the name and address of the injured person;
- (c) Describe in detail the complaint;
- (d) Identify each document which reflects, refers or relates to any information pertaining to that complaint.
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, and seeks information irrelevant to plaintiff's claims. Without waiving objections and subject to same, Graybar responds that it has received notice of alleged injury from alleged use of products manufactured by others and distributed by Graybar within the context of civil litigations involving alleged asbestos-related exposure beginning in 1985. Information regarding those claims are equally available to plaintiff.

49. With regard to each product identified in answer to Interrogatory 1 or 8, state whether you have ever been named as a defendant in any other action to recover damages for injuries resulting from cancer including but not limited to mesothelioma received as a result of using that product and, if so:

- (a) State the name and address of each plaintiff;
- (b) State the name and address of each co-defendant;
- (c) State the date it was filed;
- (d) State the name of the Court in which it was filed;
- (e) Describe the judgment rendered;
- (f) State the date that has been set for trial of any case still pending;
- (g) Describe the terms of any settlement reached before or during trial;
- (h) State whether any appeal is pending from any judgment that has been rendered.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, and seeks information irrelevant to plaintiff's claims. Graybar further responds that it has been named in civil litigations involving alleged asbestos-related exposure injuries from alleged use of asbestos-containing products manufactured by others and distributed by Graybar beginning in 1985. Information regarding those claims are equally available to plaintiff.

50. With respect to the period from 1950 through 1980, state the names, addresses and company title or position of each person who at any time during that period was in charge of the following activities with regard to each of the products identified in answer to Interrogatory 1 or 8:

- (a) Production;
- (b) Marketing;

- (c) Labeling;
- (d) Advertising;
- (e) Product evaluation;
- (f) Research and development;
- (g) Distribution.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: Graybar sold and distributed some asbestos containing products manufactured by others from 1926 until the mid 1980's. Pursuant to Graybar's *Records Retention Policy* it no longer has records of sales during the relevant time period for any product or products it distributed. Further, Graybar has never employed a person "in charge" of distributing asbestos-containing products.

51. Identify the living parties or persons who are the most knowledgeable about asbestos mined and products containing asbestos sold and/or distributed by you from 1936 to present. Identify all documents which relate to such sales and/or distribution.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, unduly burdensome, requires speculation, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds that it sold and distributed some asbestos containing products from 1926 until the mid 1980s which were manufactured by other entities. Graybar did not mine asbestos. Pursuant to Graybar's *Records Retention Policy* it no longer has records of sales during the relevant time period when any product or products it distributed may have contained asbestos. Graybar did not employ persons specifically for the purpose of selling or distributing products containing asbestos. As such, Graybar is unable to identify a living person most knowledgeable regarding the information sought.

52. Have you or anyone on your behalf attended and/or participated in any conference, seminar, lecture or symposium dealing with the hazards of using any product identified in answer to Interrogatory No. 1 or 8 or of asbestos in general and, if so, state:

- (a) The date and place of such conference, seminar, lecture or symposium;
- (b) The person or persons conducting such conference, seminar, lecture or symposium;
- (c) The person or persons who attended on your behalf;
- (d) The subject matter of such conference, seminar, lecture or symposium;
- (e) The speakers and/or moderators at such conference, seminar, lecture or symposium;
- (f) Whether any reports or memoranda were made concerning the subject matter of such conference, seminar, lecture or symposium.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound,

overly broad, unduly burdensome, requires speculation, seeks information protected by the client attorney privilege, and requests information irrelevant to plaintiff's claims. Without waiving objections and subject to same, Graybar responds: No.

53. Are you familiar with the hearing concerning the dangers of asbestos conducted in March 1967 before the House of Representatives of the United States Congress Sub-Committee on Labor? If so, identify those person who are or were associated with you that were familiar with that hearing.

ANSWER: No.

54. State when, if at all, you received knowledge of the following publications or matters discussed therein, who received such knowledge and identify all documents relating to such knowledge:

- (a) Fleischer, Viles, Gade and Drinker, "A Health Survey of Pipe-Covering operations in Construction Naval Vessels," 28 J. Indus. Hyg. 9-16;
- (b) Selikoff, et al., "Asbestosis and Neoplasia," 42 Am. J. Med. (1967);
- (c) Selikoff, Churg and Hammon, "The occurrence of Asbestosis Among Industrial Insulation Workers," 132 Ann. New York Acad. Sc. 139 (1965);
- (d) "Documentation of the Threshold Limit Values for Substances in Workroom Air," A.C.G.I.H. (3rd 1971);
- (e) "Threshold Limit Values for 1961," 11 A.C.G.I.H., (1961);
- (f) 1906 report by Dr. H. Montague Murray;
- (g) 1934 study by Dr. Anthony J. Lanza, Assistant Medical Director of Metropolitan Life Insurance Company.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, unlimited in time or scope, assumes facts not in evidence, and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: Graybar cannot say when or if it first became aware of the existence of these documents.

55. Identify each publication contained in your research library, or otherwise in your custody, including but not by way of limitation, your Research and Development Center, all medical journals, industrial medical journals, industrial hygiene journals, technical literature in the area of asbestos mining, manufacture, application and use, and Governmental publications, dealing with occupational diseases arising from the manufacture and use of asbestos-containing products. As to all such publications, state the volumes which are in your custody and control, when such volume was received and the present location of such publications.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad,

unlimited in time or scope, assumes facts not in evidence, and seeks information irrelevant to plaintiff's claims. Without waiving objections, Graybar responds that it has no research library and no such publications.

56. As to any threshold limit values published by the American Conference of Governmental Industrial Hygienists, state whether you have brought such information to the attention of those using your products. If you have not done so, state the reasons why you have not done so.

ANSWER: Graybar objects to this interrogatory on the grounds that it is compound, overly broad, and seeks information irrelevant to plaintiff's claims. This interrogatory is more properly directed to manufacturing, installation and/or premises defendants. Without waiving these objections, Graybar responds as follows: No. See response to interrogatory number 1.

57. Have you been: (a) a member of or (b) affiliated in any manner with or (c) received reports or (d) subscribed for reports or publication to the Industrial Hygiene Foundation of Pittsburgh?

ANSWER: No.

58. With regard to Interrogatory No. 57 what years did you participate under (a), (b), (c) or (d)?

ANSWER: Not applicable.

59. With regard to Interrogatory No. 58, do you have any documents obtained from the Industrial Hygiene Foundation? If so:

- (a) List all such documents;
- (b) Who currently has them in their possession?
- (c) When was each received?
- (d) State the name of the individuals who received such documents or information contained in such documents.

ANSWER: No.

60. Have you received any reports or documents prepared by Metropolitan Life Insurance Company from 1929 to about 1960, concerning statistical and other studies of asbestos workers for Johns-Manville? If so, state:

- (a) The documents received;
- (b) Who received them;
- (c) The current location of the documents.

ANSWER: No.

61. State all chemical, industrial, medical or trade associations to which you have belonged since 1936.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unreasonably burdensome, requires speculation, not limited in time or scope, and therefore seeks information and materials that are not relevant or reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving these objections, Graybar states that it does belong to business groups such as the National Association of Wholesalers and the Chamber of Commerce.

62. With regard to the associations enumerated in the answer to Interrogatory No. 62, state:

- (a) The names of each individual associated with the answering defendant since that date who have had dealings with each said association;
- (b) Describe the nature of their dealings with each such association;
- (c) State their last known address;
- (d) If still employed, their current job and title.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unreasonably burdensome, not limited in time or scope, and therefore seeks information and materials that are not relevant or reasonably calculated to lead to the discovery of relevant or admissible evidence as to this defendant.

63. Name each corporate officer and/or member of corporate management who attended any meeting and/or conference concerning the health and medical aspects of asbestos and/or the use of products containing asbestos, and for each person identified, state the nature of his participation in each such meeting or conference.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unreasonably burdensome, not limited in time or scope, and therefore seeks information and materials that are not relevant or reasonably calculated to lead to the discovery of relevant or admissible evidence as to this defendant. Without waiving said objection and subject to same, Graybar has no knowledge and that any corporate member attended any meetings or conferences concerning these issues.

64. State the sources of all products containing asbestos which have been incorporated

in any product manufactured by you which have been distributed, sold and/or utilized from 1936 to 1980.

(a) State the names of all individuals associated with the above stated sources who dealt with or handled your account;

(b) Identify any such document which refers, reflects or relates to any information provided in answer to this Interrogatory;

(c) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unreasonably burdensome, not limited in time or scope, and therefore seeks information and materials that are not relevant or reasonably calculated to lead to the discovery of relevant or admissible evidence as to this defendant. This interrogatory is more properly directed to manufacturing defendants. Without waiving said objection and subject to same, Graybar responds: Not applicable to responding party.

65. For each product identified in the answer to Interrogatory No. 1 or 8, which you distributed, identify the source from which you obtained the product.

(a) State the names of all individuals associated with the above stated sources who dealt with or handled your account and specify who handled your account for products distributed to Delaware;

(b) Identify any such documents which refer, reflect or relate to any information provided in answer to this Interrogatory.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

66. State the names of all individuals associated with you who had any dealings with the requisition and/or procurement of asbestos or products containing asbestos as indicated in answer to Interrogatories 64 and 65 and for each such person:

(a) Identify the nature of his association(s), the locations and the dates of their occurrence;

(b) Identify each document which refers, reflects or relates to any information provided in answer to this Interrogatory;

(c) As to any information received orally in answer to this Interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: See response to interrogatory number 1.

67. State the names of all individuals who dealt with or handled the account with and/or made any sales to the employer of the Plaintiff of asbestos and/or products containing asbestos.

- (a) Describe in detail the nature and dates of each such association with the said accounts;
- (b) Identify each document which refers, reflects or relates to any information provided in answer to this Interrogatory.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Without waiving these objections, Graybar responds as follows: Unknown. See response to interrogatory numbers 1 and 6.

68. Identify each individual whom you expect to call as an expert witness at the trial of this litigation, and for each person identified:

- (a) The subject on which the expert is expected to testify and the substance of the facts and opinions to which he or she is expected to testify and a summary of the grounds for each opinion;
- (b) Identify each document referring, relating or containing any such facts and/or opinions and identify each individual having custody of each document identified.

ANSWER: At the present time, Graybar has not decided which experts it may call at the trial of this matter. Graybar reserves the right to supplement its response to this interrogatory in accordance with the applicable Master Trial Scheduling Order.

69. Identify each individual who you have retained or employed or anticipate retaining or employing in any way in preparation of or anticipation of trial in this litigation who is not expected to be called as a witness at trial, and for such individual:

- (a) State the substance of any facts or opinions which he or she has discussed with any agent, employee or representative of the answering defendant, together with a summary of the grounds for each opinion;
- (b) Identify each document referring to or containing such facts and/or opinions and identify each individual having custody of each document identified.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative,

compound, overly broad, assumes facts not in evidence and seeks information irrelevant to plaintiff's claims. Graybar also objects to this interrogatory on the grounds that it is beyond the scope of discovery permitted by the Delaware Superior Court Civil Rules.

70. State the names, last known addresses and telephone numbers of each and every person whom you intend to call as a witness at the trial of this litigation.

(a) State the substance of any facts or opinion which he or she has discussed with any agent, employee or representative of the answering defendant, together with a summary of the grounds for each opinion;

(b) Identify each document referring to or containing such facts and/or opinions and identify each individual having custody of each document identified.

Specify witnesses you intend to use at the trial of this case with respect to the occurrences and/or cause of plaintiffs' illnesses or with respect to the claimed damages or with respect to your liability.

ANSWER: At the present time, Graybar has not decided which experts it may call at the trial of this matter. Graybar reserves the right to supplement its response to this interrogatory in accordance with the applicable Master Trial Scheduling Order.

71. State:

(a) Whether your corporation is insured;

(b) If so, the limits of coverage;

(c) The name of the insurance company;

(d) Whether this claim has been accepted or whether a letter of intent to deny coverage has been received.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, assumes facts not in evidence, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Graybar responds as follows: With respect to policies covering personal injury, and limited to the period during which Graybar distributed asbestos containing materials, Graybar has been insured by Royal Insurance Company.

72. In whose possession are your and your predecessors' annual reports from 1936 to the present. Produce such reports.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not limited in time or scope. The Interrogatory seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Graybar further objects to this Interrogatory and request on the grounds that it seeks certain information

that is proprietary and confidential.

73. Describe in detail your policy with respect to the destruction of records pertaining to each of the products identified in answer to Interrogatory 1.

(a) Identify all documents pertaining to your policy, if any, regarding the destruction of such records;

(b) Identify the person or persons having custody of such policy documents;

(c) Identify the person or persons in charge of destroying records pertaining to each such product;

(d) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory;

(e) Describe what steps, if any, you have taken since the institution of this action or other actions involving asbestos to prevent the destruction of any documents relating to asbestos.

ANSWER: Please refer to Graybar's records retention policy produced herewith.

74. State the names of all individuals who aided in the preparation of these answers, and for each such person, state:

(a) Which interrogatories they helped prepare or the particular subject area for which they supplied information;

(b) Their current position with the company;

(c) Their current or last known home and business address and phone numbers.

ANSWER: Responses were prepared by counsel for Graybar with input and verification provided by Alice Lehnhoff, Esquire, Corporate Counsel for Graybar.

75. State all processes used by plaintiff's employer, known to any defendant where asbestos was an ingredient.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, assumes facts not in evidence, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Graybar responds as follows: Unknown.

76. State all use of asbestos insulation by plaintiff's employer, known to any defendant.

(a) The types of asbestos insulation used;
(b) Manufacturer and/or brand names;
(c) Locations in said plants where said insulation was used;
(d) The person most knowledgeable in said corporation about the purchasing of insulation by distributors that covered the states of New Jersey, Delaware, Pennsylvania and Maryland.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, assumes facts not in evidence, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Graybar responds as follows: Unknown.

77. If you have insurance including secondary or tertiary coverage, state:
(a) Policy number and amount;
(b) Company underwriting said insurance;
(c) The name of your contact in said company concerning asbestos claims.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, assumes facts not in evidence, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Graybar responds as follows: With respect to policies covering personal injury, and limited to the period during which Graybar distributed asbestos containing materials, Graybar has been insured by Royal Insurance Company.

78. State whether you have entered into any agreement, either oral or written, with any other defendant in this action regarding

- (1) Settlement or non-settlement and/or
- (2) Allocation of damages, should the plaintiffs prevail on liability.

If the answer is yes to either of the above, state the substance of each such agreement and such parties who have entered into this agreement:

- (a) Identify those persons who participated in the preparation of each such agreement and describe in detail the nature and extent of his participation; and
- (b) Identify each document which contains, refers or relates to each such agreement.

ANSWER: No.

79. Do you or your attorneys know of any person or persons not listed in the preceding answers having knowledge of facts relevant to the allegations in this lawsuit

including witnesses to the accident, injury, illnesses, etc. , in question? If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you, the present whereabouts of all such persons and which of said persons you intend to produce as witnesses in the trial of this action.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not limited in time or scope. Graybar further objects to this interrogatory in that it seeks information protected by the attorney client privilege. Without waiving objections and subject to same; Graybar responds that it has no information regarding any person or persons not equally available to plaintiffs.

80. Do you or your attorneys have any written statements which you have not previously produced in this suit from any persons having knowledge of facts relevant to the subject matter of this lawsuit, including witnesses to the accident, injury, illnesses, etc., in question If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you and the present whereabouts of all such persons.

ANSWER: Graybar objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not limited in time or scope. Graybar further objects to this interrogatory in that it seeks information protected by the attorney client privilege. Without waiving objections and subject to same; Graybar responds that it has no information regarding any person or persons not equally available to plaintiffs.

81. State whether you were a member of the Asbestos Information Association (A.I.A.) or in any manner received information or participated in any of the association's activities.

ANSWER: No.

82. If your answer to any part of Interrogatory 82 is in the affirmative, please state:

- (a) The date, times and places of any A.I.A. meetings attended;
- (b) The date and time period during which you received any publication of the A.I.A.;
- (c) The name, address and telephone number of each and every person who attended such meetings and to whom any publications were sent;
- (d) The nature of the information that was furnished at meetings or in such publications;
- (e) Name, address and telephone number of the present or last known custodian of any copies of A.I.A. newsletters, correspondence or publications.

ANSWER: Not applicable.

83. State whether you received a publication known as the "Asbestos Magazine".

ANSWER: No.

84. If your answer to Interrogatory 84 is in the affirmative, please state:

- (a) The date and time periods during which you received such publication;
- (b) The frequency of receipt, e.g., regularly, occasionally, rarely, etc.
- (c) The terms, circumstances or requirements of receipt of such publication, e.g., free, by subscription, distributed at meetings, etc.
- (d) Name, address and telephone number of the present or last known custodian of any copies of such magazine.

ANSWER: Not applicable.

85. Does the answering defendant have in its possession any medical records, not previously produced in this case relating to any of the plaintiffs, including, but not limited to, charts, x-rays, physical examination reports, summaries, tape recordings of interviews and any and all other records pertaining to the medical condition of the plaintiffs? If so, plaintiffs request that such records be produced in accordance with Rule 34.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad, assumes facts not in evidence, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Graybar responds as follows: No.

86. With respect to each contention contained in your response to the Complaint, state the following:

- (a) Identify which defense it relates to;
- (b) Each fact upon which your contention is based;
- (c) The names and present or last known addresses and present or last known employer of all persons having knowledge of any of the facts set out in answer to subparagraph (b) hereof;

The description or designation of each document which in any way reflects, relates or refers to any of the facts set out in answer to subparagraph (b) hereof.

ANSWER: Graybar objects to this interrogatory on the grounds that it is duplicative, compound, and overly broad. See prior answers to interrogatories, which are incorporated by reference.

87. Other than annual reports produced pursuant to No. 73 above, identify documents which accurately reflect the following information as to the answering defendant for each calendar year since 1940:

- (a) Total net worth;
- (b) Profits;
- (c) Total earnings;
- (d) Specific earnings attributed to the manufacture and/or distribution of any products containing asbestos.

ANSWER: Graybar objects to this interrogatory on the grounds that it is overly broad and is not reasonably calculated to lead to the discovery of admissible evidence. Graybar also objects to this interrogatory on the grounds that it is beyond the scope of discovery permitted by the Delaware Superior Court Civil Rules and Delaware common law. Graybar reserves the right to supplement its response to this interrogatory in accordance with the applicable Master Trial Scheduling Order.

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