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April 4, 1983

Mr. Murray L. Harris
U. S. District Clerk
Room 212
U.S. Courthouse & Federal Bldg.
Beaumont, Texas 77701

Re: Master Asbestos File

Dear Mr. Harris:

Enclosed for filing please find one original and one copy of Combustion Engineering, Inc.'s Responses to Plaintiffs' Master Set of Request for Admissions and Master Set of Answers and Objections to Plaintiffs' Master Set of Interrogatories. Please acknowledge receipt and date of filing in your usual manner and return to me.

By copy of this letter, copies of said documents are being forwarded to Plaintiffs' counsel by certified mail, return receipt requested and to all counsel of record as indicated below.

Very truly yours,

Robert Scott

RS/jp
Enclosures

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cc: All Counsel Of Record

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

IN RE ASBESTOS CASES

COMBUSTION ENGINEERING, INC.'S RESPONSES TO PLAINTIFFS' MASTER SET OF REQUEST FOR ADMISSIONS

GENERAL OBJECTION

This Defendant manufactured asbestos containing insulation products only from June of 1963 to 1972. This Defendant objects to providing answers for any other period of time because such additional information is neither relevant, material, nor calculated to lead to the discovery of admissible evidence. Furthermore, to comply with such requests for any other period of time would be burdensome, expensive and harassing.

RESPONSES TO REQUEST FOR ADMISSIONS

1. You are now in the business of manufacturing, selling or distributing products containing asbestos.

ANSWER: Denied.

2. You have been in the past in the business of manufacturing, selling or distributing products containing asbestos.

(a) This was true during a part of time during 1940 and 1972.

ANSWER: Admit to the extent that this Defendant was involved in the asbestos containing insulation business only from June of 1963 to 1972.

(b) Between 1940 and 1972, your products were sold or distributed in Texas.

ANSWER: Admit to the extent that some of this Defendant's products may have been introduced into the State of Texas between June of 1963 and 1972.

(c) After 1972, some of your asbestos products were still in place where installed earlier.

ANSWER: This Defendant does not have sufficient information upon which to base a response to this request and therefore this request is denied.

3. You knew your products inquired about above contained asbestos.

ANSWER: Admit.

4. You gave no warning to the Plaintiff(s) in this case of the dangers of asbestos.

ANSWER: Denied.

5. Asbestos is a known cause of asbestosis.

(a) A known cause of mesothelioma.

(b) A known cause of cancer of other bodily organs.

(c) A known cause of lung or bronchial damage.

ANSWER: This Defendant objects to this request on the basis that it is overly broad, vague and ambiguous and is not calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant objects to this request on the basis that it seeks to require an expert medical conclusion or opinion which this Defendant is unable to render.

Respectfully submitted,

By: _____
Robert Scott

OF COUNSEL:

SEWELL & RIGGS
800 Capital Bank Plaza
Houston, Texas 77002
(713) 652-8700

THE STATE OF PENNSYLVANIA §
§
COUNTY OF MONTGOMERY §

BEFORE ME, the undersigned authority, on this day personally appeared Frank T. Christenson, who, after being duly sworn, states that he is employed by the Defendant, Combustion Engineering, Inc., and is authorized to execute this affidavit on behalf of the Defendant, and that the foregoing responses and objections are true and correct based on his information and belief. The answers are based on information secured from various sources within the company and otherwise.

Frank T. Christenson

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned notary republic to certify which witness my hand and seal of office on this the 25th day of March, 1983.

DORIS M. CONBOY, Notary Public
Upper Providence Twp., Montgomery Co.
My Commission Expires Sept. 30, 1985

Notary Public In And For
Montgomery County, Pennsylvania

CERTIFICATE OF SERVICE

This is to certify that on this the 4th day of April, 1983, a true and correct copy of the foregoing Responses to Plaintiff's Master Set of Request for Admissions was placed in the United States Mail, postage pre-paid, to the Plaintiff's attorneys of record and to all other interested counsel.

Robert Scott

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

IN RE ASBESTOS CASES

COMBUSTION ENGINEERING, INC'S MASTER SET OF ANSWERS AND OBJECTIONS TO PLAINTIFFS' MASTER SET OF INTERROGATORIES

NOW COMES COMBUSTION ENGINEERING, INC., Defendant and files these its answers to the Master Set of Interrogatories filed on behalf of asbestos Plaintiffs in the Eastern District of Texas. The answers are made subject to all proper objections and for the purpose of these pending actions only.

The Defendant's answers are as follows:

1. As to the person answering these interrogatories, state:

   (a) Name:

   (b) Title or position with defendant:

   (c) Business address:

   (d) Length of time employed by defendant:

   (e) State year by year all other positions, titles or jobs that person has held with the defendant.

ANSWER:

(a) Frank T. Christenson

(b) Assistant to Vice-President-Industrial Sales

(c) C. E. Refractories, Combustion Engineering, Inc., P. O. Box 828, Valley Forge, Pennsylvania.

(d) Nineteen years.

(e) Defendant objects to this Interrogatory because it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of admissible evidence.

2. State the following concerning this defendant.

(a) Full and correct name:

(b) Principle place of business:

(c) State of incorporation:

(d) Date of incorporation, and name of corporation:

(e) Is this defendant authorized to transact business in the State of Texas? If so, state the date such authority was first issued and last renewed:

(f) Does this defendant have an agent, representative or place of business in Texas? If so, state the name and address of such agent, representative, or place of business.

(g) Does this defendant have an agent for service in the State of Texas? If so, state the name and address of the registered agent.

ANSWER:

(a) Combustion Engineering, Inc.

(b) 900 Long Ridge Road, Stamford, Connecticut 06902.

(c) Delaware.

(d) October 25, 1912, Locomotive Superheater Company.

(e)- Yes. January 17, 1949.

(f) Yes.

(g) C-T Corp. Systems, Republic National Bank Building, Dallas, Texas.

3. Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 2 above concerning the defendant as correctly named.

ANSWER:

The correct name of this Defendant is Combustion Engineering, Inc.

4. Has this defendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, processed, distributed or contracted to apply insulation products containing asbestos?

ANSWER:

In 1969 Defendant merged with Walsh Refractories Corporation. Walsh Refractories Corporation sold certain asbestos-containing insulation products but these products were sold to stove manufacturers in the St. Louis, Missouri area for use in the manufacturing of stoves.

5. If the answer to Interrogatory No. 4 is "Yes," then state the following concerning such predecessor:

(a) Full and correct name:

(b) The principal place of business:

(c) State of incorporation:

(d) Date of acquisition by defendant:

(e) Was this business authorized to transact business in the State of Texas?

(f) Attach copies of all papers pertaining to the acquisition.

ANSWER:

(a) Walsh Refractories Corporation.

(b) St. Louis, Missouri.

(c) Missouri.

(d) 1969.

(e) Unknown.

(f) Defendant objects to this Interrogatory as being not reasonably calculated to lead to the discovery of evidence admissible at the trial of this lawsuit and as being unduly burdensome. Walsh Refractories Corporation did not manufacture asbestos-containing insulation products which would have been sold to the insulation contractors or which would have been used by insulation installers in the construction, maintenance, or petro-chemical industries. The products sold by Walsh were sold in the St. Louis, Missouri area exclusively and not in the Eastern District of Texas.

6. As to any product containing asbestos in any form, has this defendant, or any predecessor(s):

(a) Ever designed such a product?

(b) Manufactured such a product?

(c) Processed such a product?

(d) Sold such a product?

(e) Distributed such a product?

(f) Patented such a product?

(g) Relabeled such a product which was manufactured, sold, or distributed by another company?

ANSWER:

(a) Defendant does not understand the term "design" in connection with asbestos-containing insulation products.

(b) Defendant for a short period of time manufactured some asbestos-containing insulation products.

(c) Defendant does not understand what Plaintiff means by "processed."

(d) Defendant for a short period of time sold certain asbestos-containing insulation products.

(e) Defendant has distributed asbestos-containing insulation products.

(f) No.

(g) Yes. From 1963 through 1975, this Defendant sold a product manufactured by Flintkote, under the name Weatherkote. The product contained some asbestos in emulsion.

7. If your answer to No. 6(b), 6(d) and 6(e) is "Yes", then give the trade name of the product, the year the defendant or predecessor first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER:

Defendant did not sell any asbestos containing insulation products prior to June 1963 nor except for one product which contained asbestos in emulsion after 1972. See Exhibit "I". Defendant does not believe Walsh Refractories Corporation was a "predecessor." Further, the asbestos-containing insulation products manufactured by Walsh Refractories Corporation were used with stoves almost exclusively in St. Louis, Missouri and were not used as commercial insulation. These products for stoves were sold between 1950 and 1969. Thus, its products would be completely irrelevant and immaterial to any issue in this lawsuit. See Exhibit "I".

8. Have any of the products listed above in Interrogatory No. 6 been altered in chemical composition since first being marketed?

ANSWER:

Unknown.

9. If so, please state:

(a) The trade name of each such product.

(b) The date each such product was altered.

(c) The nature of the alteration.

(d) The reason for the alteration.

ANSWER:

Not applicable.

10. What is the name, address, and the job title of each individual who participated in the design and preparation of manufacturing specifications for each such product?

ANSWER SUBJECT TO OBJECTION:

Unknown.

Defendant does not understand the meaning of the terms "design" and "preparation" in this context and therefore objects to this Interrogatory.

11. Do any written memoranda, specifications, blueprints or other written materials of any kind or character relating to the design and preparation of said products now exist?

ANSWER SUBJECT TO OBJECTION:

Unknown.

Defendant does not understand the meaning of the terms "design" and "preparation" in this context and therefore objects to this Interrogatory.

12. If so, please state:

(a) List each written material or document.

(b) Who presently has possession of each such document.

(c) Where is it located?

ANSWER:

Not applicable.

13. In what year did the defendant first begin selling or distributing insulation products containing asbestos?

ANSWER:

1963.

14. In what year did the defendant last sell the insulation product which contained asbestos?

ANSWER:

Except for one product which contained some asbestos in emulsion, 1972.

15. As to the named defendant or any predecessor(s) or acquired business, state the various types of products, such as blocks, pipe covering, cements, tape, spray-on insulation, mastics, and cloth, and in connection with each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

ANSWER:

See Exhibit "I".

16. Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any insulation products containing asbestos? If so, give the brand names of such products, the binding material and date first manufactured.

ANSWER:

No.

17. Were each of your insulation products generally expected to reach, or were packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Yes, they were packaged to reach the consumer or user without substantial change.

18. If your answer to Interrogatory No. 17 is "No," with respect to any product, explain in what way the defendant claims its products were altered or substantially

changed after sale or distribution and before reaching the insulation helper or mechanic.

ANSWER:

Not applicable.

19. Do you admit that asbestos insulation applicators, helpers or mechanics, were foreseeable users of defendant's asbestos-contained insulation products, such as:

(a) Pipe covering;

(b) Blocks;

(c) Asbestos cloth;

(d) Mastics;

(e) Spray-on insulation;

(f) Rope or tape;

(g) Asbestos sheeting or millboard;

(h) Cements.

ANSWER SUBJECT TO OBJECTION:

Defendant objects to this Interrogatory because it seeks a legal conclusion and opinion.

(a) Not applicable.

(b) Asbestos insulation applicators, helpers, or mechanics were foreseeable users of most of the Defendant's asbestos-containing insulation products.

(c) Not applicable.

(d) Not applicable.

(e) Not applicable.

(f) Not applicable.

(g) Not applicable.

(h) Asbestos insulation applicators, helpers, or mechanics were foreseeable users of most of the Defendant's asbestos-containing products.

20. Based upon the material contents of your products, the method of manufacturing, and the method of application for the purpose of insulation, can your products be generally applied by an insulator without liberating asbestos fibers?

(a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name;

(b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

ANSWER:

Defendant objects to this Interrogatory because the question is vague, ambiguous, unclear and misleading in that it speaks in terms of "liberating asbestos fibers" without defining the quantities and any answer would be misleading and prejudicial without such description or definition.

ANSWER SUBJECT TO OBJECTION:

This Defendant made different types of asbestos-containing insulation products. The answer to this Interrogatory depends on the particular product involved and the specific use to which it was being put.

21. Was it a foreseeable use of your asbestos containing insulation products that they may have to be removed, stripped or replaced at any time after installation? If your company contends the plaintiff(s) misused any of your products then state how and under what circumstances your product was misused.

ANSWER:

Defendant objects to this Interrogatory because it seeks a legal conclusion or opinion.

22. Prior to releasing the products listed in Interrogatory No. 6 to the public for sale, were any tests conducted on same to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

No.

23. If so, please state:

(a) The name, address, and job classification of each individual who conducted such tests;

(b) The results of such said tests;

(c) Date of such studies.

ANSWER:

Not applicable.

24. Do any written memoranda, specifications, blueprints or other written materials of any kind or character exist relating to the testing of said products?

ANSWER:

Not applicable.

25. If so, please state:

(a) List each such written material or document;

(b) Who presently has possession of each such document and where is it located.

ANSWER:

Not applicable.

26. Did defendant or any of its subsidiary companies make any design changes as a result of such tests?

ANSWER:

Not applicable.

27. If so, please state:

(a) The nature of the change made;

(b) The name, address, and job classification of each person in charge of making a change.

ANSWER:

Not applicable.

28. After releasing said products to the public, were any tests conducted thereon to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

No.

29. If so, please state:

(a) The name, address, and job classification of each person conducting said tests;

(b) The results of said tests.

ANSWER:

Not applicable.

30. Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to go to areas where your products were being used or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the findings, and attach results.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. This Defendant had no such inspectors.

31. If your company performed or had performed any dust level counts, what action based on the results did your company take?

ANSWER:

Not applicable.

32. Has your company or its predecessor(s) ever conducted any studies concerning the effects of the inhalation of asbestos dust or fibers on one using or being exposed to any of the asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? In answer to this question, give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to whom such reports were given, and the date.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. This Defendant made no such studies.

33. Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's insulation products? If so, give the following:

(a) Name of the person or firm conducting such studies;

(b) The date the studies began and the date completed;

(c) Any publication or dissemination of the results of the studies;

(d) The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;

(e) Attach copies.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. This Defendant made no such studies.

34. If your answer to Interrogatory No. 33 is "Yes," state the name and address of such industrial hygienist or hygienists.

ANSWER:

Not applicable.

35. Does your company have, has it ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

(a) How much expended each year on research, etc.;

(b) What percentage of gross sales did your company or its predecessor spend on research concerning the health affects of asbestos.

ANSWER:

Yes. This Defendant has a research department which was established some time in 1964 to develop ceramic products and evaluate ceramic products physical properties. This department also investigates failures or malfunctions of ceramic products. The research department has operated continuously since it was established. With respect to subparts (a) and (b), this information has not been retained.

36. State in detail the purpose, duties and responsibilities of such Research Department.

ANSWER:

See answer to Interrogatory No. 35.

37. Does your company have, has it ever had, or has your predecessor ever had, a Medical Department? If so, give the year such Medical Department was established, and whether or not such Medical Department has operated continuously since being established.

(a) Name each director, chief, or head of your Medical Department year by year with the first year you had a medical director or Medical Department. Give the last known address of each.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. During the time that this Defendant

was in the business of manufacturing asbestos-containing insulation products, i.e. mid-1963 to 1972, the only physicians employed by this Defendant were employed to conduct routine physical examinations and to handle emergencies. These physicians rendered no advice relative to asbestos. Since these physicians rendered no advice relative to asbestos, their specific identity is not relevant nor material to this matter.

38. State in detail the duties and responsibilities of such Medical Department.

ANSWER:

See answer to Interrogatory No. 37.

39. Prior to 1965, did your company, or any predecessor(s), ever at any time give insulation mechanics or insulation helpers who would be applying or removing your products instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER:

No.

40. Did your company, or your predecessor(s), ever place any warning signs on the containers in which asbestos insulation products were packaged?

ANSWER:

Yes.

41. If you have answered Interrogatory No. 40 in the affirmative, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your insulation products, or containers?

(b) On what date was such warning actually first placed on your insulation products or containers?

(c) On what date did your insulation products, accompanied by such warning, first reach the insulation contractor?

(d) State the exact wording of the first warning;

(e) State the exact size of the warning printed on your asbestos insulation products or containers;

(f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?

(g) Why did your company or its predecessor(s) place such warning on your asbestos insulation products or containers?

(h) Did your company or its predecessor(s) place such warning on your asbestos insulation products or containers because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion, legal opinion, or other type of communication;

(i) If the wording of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording.

ANSWER:

(a) Defendant first placed warnings on its asbestos-containing insulation products in 1969.

(b) Defendant first placed warnings on asbestos-containing insulation products in 1969, but the exact date in 1969 when warnings were first placed on the products is unknown at this time.

(c) Unknown.

(d) See copy of the warning attached hereto as Exhibit II.

(e) See copy of the warning attached hereto as Exhibit II. To the best of Defendant's knowledge this was the size of most of the warning labels attached to this Defendant's asbestos-containing insulation products. This Defendant has not manufactured asbestos-containing insulation

products since 1972. If any warnings were of a different size, this Defendant is not aware of such fact.

(f) Defendant assumes that it was responsible for the selection of the size of its warning.

(g) Defendant is unable to state at this time, some fifteen years after the occurrence, the exact information in the hands of the Defendant at the time the warning was placed on its products. Apparently some of the information concerning a possible health hazard from asbestos came from sources available to the public generally.

(h) No.

(i) Not applicable.

42. Did your company or its predecessor(s) ever place any warning directly on any of its asbestos insulation pipe covering itself, block itself, cloth itself, or millboard itself?

ANSWER:

Defendant did not have any "predecessors" as it understands that term. Warnings were placed on the containers of the Defendant's products.

43. Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, or millboard?

ANSWER:

If the Interrogatory inquires into the product as opposed to the package, the answer is "No".

44. Did the warning inquired about in Interrogatories Nos. 42 and 43, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

ANSWER:

No.

45. On what date was the sales literature inquired about in Interrogatory No. 44 first provided to distributors or sellers of your company's products, or your predecessor(s)'s products?

ANSWER:

Not applicable.

46. Has your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER:

Defendant did not have any "predecessors" as it understands that term.

47. Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

ANSWER:

We do not understand the meaning of the term "material safety data sheets."

48. Did your company or its predecessor ever recall any products containing asbestos from the common market?

(a) State all details of such recall, giving the name of the product, the time of recall and any further action taken in connection with the recall.

Defendant did not have any "predecessors" as it understands that term. We do not understand the meaning of the term "common market" and therefore object to this Interrogatory. Products were sold to parties who were highly experienced in the insulation field.

ANSWER SUBJECT TO OBJECTION:

This Defendant never recalled any products containing asbestos.

49. Has your company or its predecessor(s) ever directly advised any contractor to whom you sell your products containing asbestos of threshold limit values for

exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractors, and the name of each contractor.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. However, as to this Defendant the answer is "No."

50. Prior to 1964 did your company or its predecessor(s) ever manufacture insulation products containing asbestos without a warning? List the years.

ANSWER:

Yes. 1963.

51. After 1964 did you ever manufacture insulation products containing asbestos without a warning? If so, list the name of the product and the years.

ANSWER:

Yes. Defendant first placed warnings on its asbestos-containing insulation products in 1969.

52. Prior to 1970, did your company, or any predecessor(s), ever manufacture and sell a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. Without being furnished a specific definition of "high temperature heat insulation" Defendant is unable to answer this Interrogatory.

53. Is your company, as of the date of answering these Interrogatories, still manufacturing, selling or distributing any insulation products containing asbestos? If so, give the brand names of such products and the binding material and date of first manufacture of such product.

ANSWER:

No.

54. If your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos, state what prompted your company to devise such high temperature heat insulation not containing asbestos.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. Without being furnished a specific definition of "high temperature heat insulation" Defendant is unable to answer this Interrogatory.

55. Has such high temperature heat insulation not containing asbestos performed satisfactorily; that is, is such insulation suitable for the purpose for which it is to be used?

ANSWER:

Without being furnished a specific definition of "high temperature heat insulation" Defendant is unable to answer this Interrogatory.

56. Give the trade names of your high temperature heat insulation products which do not contain asbestos, and state fully what such insulation contains.

ANSWER:

Without being furnished a specific definition of "high temperature heat insulation" Defendant is unable to answer this Interrogatory.

57. State the decade that there first existed manufacturing technology for commercial purposes the use of chemicals and minerals for combining into a high heat insulation product a substitute for asbestos in insulation materials.

ANSWER:

Without being furnished a specific definition of "high temperature heat insulation" Defendant is unable to answer this Interrogatory.

58. To your company's knowledge, in what decade was fiberglas first commercially available for insulation over 350 degrees F.?

ANSWER:

Unknown.

59. In what decade was each of the following products commercially available for use and sale:

(a) Fiberglass;

(b) Calcium silicate;

(c) Mineral wool;

(d) Rock wool;

(e) Foamglass;

(f) Ceramics;

(g) Wood pulp;

(h) Organic pulp.

ANSWER:

Defendant objects to this Interrogatory because it is overly broad and irrelevant to this Defendant, at least in regard to (a), (b), (e) through (h) since this Defendant did not manufacture insulation products containing the materials listed in those subparts and an answer would involve research and opinions which Defendant is not required to perform or make.

(a) Unknown.

(b) Unknown.

(c) Unknown.

(d) Unknown.

(e) Unknown.

(f) Unknown.

(g) Unknown.

(h) Unknown.

60. List all insulation products sold in the 1940's, 1950's and 1960's which did not contain asbestos and give the physical and tensile strength and temperature decomposition data for each product.

ANSWER:

Defendant objects to this Interrogatory because it is overly broad and unduly burdensome and this Defendant could not possibly know or determine what insulation products were sold in the years set forth which did not contain asbestos. In addition, Defendant objects because this Interrogatory calls for an engineering study which this Defendant is not required to make. The list attached as Exhibit I provides all information concerning the asbestos-containing insulation products manufactured by this Defendant.

61. Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. This Defendant had no insulation contract units. Neither this Defendant nor any of its divisions nor subsidiaries has been an insulation contractor.

62. Did any division of your company or subsidiary company engaged in the contract business of applying insulation products or your workmen's compensation insurance carrier ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is "Yes," give the name of such employees

and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER:

Not applicable. See answer to Interrogatory No. 61.

63. Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER:

Not applicable.

64. Was your medical department or industrial health department or industrial hygienist responsible for contracting unit employees?

ANSWER:

Not applicable.

65. Did your company or its predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. Defendant assumes this Interrogatory inquires into industrial hygiene surveys related to exposure to asbestos insulation products. In that case the answer is "No". This Defendant has continuously employed industrial hygienists since 1956.

66. State the year that this defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.

ANSWER:

Defendant did not have any "predecessors" as it understands that term. Plaintiff is inquiring into information concerning events which occurred almost eighteen years ago, and Defendant cannot answer this Interrogatory other than to say Defendant was aware of threshold limit values during at least some of the time it manufactured asbestos-containing insulation products.

67. Was such threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 66 TOTAL dust and not just asbestos dust?

ANSWER:

It is this Defendant's understanding that the threshold limit values, using a fiber counting method and as they apply to asbestos-containing insulation products were abestos fibers only.

68. State in detail what test, if any, your company ever made with regard to the quantity, quality of threshold limit values of asbestos dust or particles to which insulators were exposed while using your products containing asbestos.

ANSWER:

No tests have been made by this Defendant.

69. When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

(a) Asbestosis;

(b) Mesothelioma;

(c) Lung cancer;

(d) Any other diseases;

(e) With reference to your company give the name of such official who first had such knowledge, information or understanding;

(f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

ANSWER:

Defendant objects to Interrogatory No. 69 because the question is vague, indefinite and seeks a medical opinion this Defendant is unable to render. Defendant has been unable to determine a specific date, nor source of information that an association existed between mesothelioma, or lung cancer and the inhalation of asbestos fibers. Dr. Irving J. Selikoff, who first reported there was no greater incidence of lung cancer in asbestos insulators who did not smoke cigarettes than the average American, published articles on this subject in the late 1960's.

70. As to every product of yours which you have identified in previous interrogatories state specific type or types of asbestos, (i.e., crocidolite, chrysotile, amosite or any others) which your products contained. If you have any percentage figures available, then give the percentage as to each product.

ANSWER:

See Exhibit "I".

71. Does defendant contend that plaintiff improperly used its products?

ANSWER:

Defendant does not know whether the plaintiff(s) used any product of this Defendant and this Interrogatory cannot be answered generally. As to individual plaintiffs, it can only be answered after discovery.

72. Set forth a list of photographs, plats, sketches or other documents in the possession of the party that will potentially be used as an exhibit at the trial of this case by you.

ANSWER:

Defendant objects to this Interrogatory because the photographs which will be used or any exhibits which may be drafted for use at the trial of any case will

depend upon the facts of that case. Defendant further objects because these are matters to be listed in the appropriate pre-trial order and cannot be answered generally.

73. Were you or any of your agents, servants, employees aware of any of the articles described on Exhibit A prior to the year 1950?

No.

ANSWER:

Defendant objects to this Interrogatory because it is too broad, vague and indefinite to require a sworn response. In addition, it is irrelevant to this Defendant who neither manufactured nor sold asbestos containing insulation products prior to 1963.

ANSWER SUBJECT TO OBJECTION:

74. If you answered the foregoing question "Yes," then answer the following:

(a) Set forth such articles you had knowledge of and the date you acquired such knowledge.

ANSWER:

Not applicable.

75. As of January 1, 1965, what quantity of the following asbestos-containing insulation products were stored in your warehousing facility or facilities awaiting sale to contractors or other concerns:

(a) Pipe covering (state figure and number of boxes);

(b) Block (state figure and number of boxes);

(c) Cement (state figure and number of bags).

ANSWER:

(a) None.

(b)&(c) This Defendant has no inventory or other records sufficient to respond to this Interrogatory.

76. Do you have any photographs of the products inquired about above or their packages or containers? If so, please attach exact copies.

ANSWER:

See answer to Interrogatory No. 75.

77. Do you contend that none of your asbestos-containing insulation products were sold to or ever reached the premises of any or all of the concerns listed in Exhibit "B" attached hereto? If so, indicate which and explain the factual basis for this contention.

ANSWER:

Defendant objects to this Interrogatory because it is unlimited as to date and therefore does not limit the consideration of the answer to this Interrogatory to any specific case or any specific claimed exposure and it would be impossible to provide an appropriate answer for the short period of time this Defendant manufactured asbestos-containing insulation.

Respectfully submitted,

SEWELL & RIGGS

By: _____

Robert Scott
Bar No. 17911800
800 Capital Bank Plaza
Houston, Texas 77002
(713) 652-8700

ATTORNEYS FOR DEFENDANT,
COMBUSTION ENGINEERING, INC.

THE STATE OF PENNSYLVANIA §
§
COUNTY OF MONTGOMERY §

BEFORE ME, the undersigned authority on this day personally appeared Frank T. Christenson, who, after being duly sworn, stated that he is employed by the Defendant, Combustion Engineering, Inc., and is authorized to execute this affidavit on behalf of the Defendant, and that the foregoing Answers and Objections to Plaintiffs' Master Set of Interrogatories are true and correct based on his information and belief. The answers are based on information secured from various sources within the company and otherwise.

Frank T. Christenson
FRANK T. CHRISTENSON

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned notary public to certify which witness my hand and seal of office on this the 23rd day of March, 1983.

DORIS M. CONBOY, Notary Public
Upper Providence Twp., Montgomery Co.
My Commission Expires Sept. 30, 1985

Doris M. Conboy
NOTARY PUBLIC IN AND FOR
THE STATE OF PENNSYLVANIA

MY COMMISSION EXPIRES:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed to Plaintiff's counsel, certified mail, return receipt requested, and to all other interested counsel in the Eastern District of Texas this the 4th day of April, 1983.

Robert Scott

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Arco Polymers Refinery, Port Arthur, Texas
American Bridge Division, US Steel, Orange, Texas
American Petrofina, Port Arthur, Texas
Amoco, Chocolate Bayou, Texas

Bethlehem Steel, Beaumont, Texas

Cities Service Refinery, Lake Charles, Louisiana
Cit Con Refinery, Lake Charles, Louisiana
Carbon Carbide, Texas City
Consolidated Shipyard, Orange, Texas
Continental Refinery, Lake Charles, Louisiana

Dow Chemical, Freeport, Texas
E.I. DuPont, Orange, Texas
E.I. DuPont, Beaumont, Texas

Firestone, Orange, Texas

Gulf Oil Corporation, Port Arthur, Texas
Gulfport Shipbuilding, Port Arthur, Texas
Goodyear, Baytown, Texas
Gulf States Powerhouse, Bridge City, Texas

Jefferson Chemical, Port Neches, Texas

Levingston Shipbuilding Company, Orange, Texas

Mobil Chemical, Beaumont, Texas
Monsanto Chemical, Chocolate Bayou, Texas

Olin-Matheson, Lake Charles, Louisiana

Petro Tex, Houston, Texas
PPG Plant, Lake Charles, Louisiana
Pure Oil Refinery, Port Neches, Texas

Shell Chemical, Deer Park, Texas
Sinclair-Koppers, Port Arthur, Texas
Sinclair-Koppers, Pasadena, Texas
Sinclair-Koppers, Houston, Texas

Texaco Refinery, Port Arthur, Texas

Union Oil, Port Arthur, Texas

EXHIBIT B

TO PLAINTIFFS' MASTER SET OF INTERROGATORIES

EXHIBIT I

INSULATING BLOCK	C-E START	ESTIMATED STOP	PERCENT AND TYPE OF ASBESTOS	CONTAINER
(m) #12 Insulating Block (P)	1963	1966	4.5(A)	Cardboard Carton
(m) #19 Insulating Block (P)	1963	1966	4.6(A)	Cardboard Carton
(m) Griptex Mineral Wool Block (I)	1964	1972	2.0(C)	Cardboard Carton
(m) Kaiser M Block (I)	1964	1971	2.0(C)	Cardboard Carton
INSULATING CEMENTS				
(m) Stic-tite (P)	1963	8/30/72	38.6-42.2(C)	50 lb bags
(m) Super Stic-tite (P)	1964	8/30/72	9.89-10(C)	50 lb bags
(m) Super Finish Stic-tite (P)	1963	6/27/72	11.5-13.1(C)	50 lb bags
(m) Super Finish (P)	1965	1/10/68	14.2(C)	40 lb bags
(m) Super 711 (I)	1964	6/27/72	13.75(C)	50 lb bags
(m) Kaiser Mineral Wool Cement (I)	1964	1971	13.75(C)	50 lb bags
(m) Utility Thermal Finish Cement (I)	1964	2/28/72	5.00(C)	50 lb bags
(m) Casing Cement (I)	1964	1969	4.9(C)	50 lb bags
(m) MHD Finishing Cement (I)	1964	1968	68.03(C)	50 lb bags
(m) Pyroscat Fireproofing Cement (I)	1964	6/8/72	3.0(C)	50 lb bags
(m) Hilite Insulating Cement (I) -	1964	1968	9.1(C)	50 lb bags
(m) A-1199 Insulating Cement (P)	1963	8/23/66	43.4(C)	50 lb bags

INSULATING BLOCK	C-E START	ESTIMATED STOP	PERCENT AND TYPE OF ASBESTOS	CONTAINER
(m) SDK 50 (P)	1963	1966	0.4(A)	50 lb bags
(m) Buck Stay Cement A-1360 (P)	1965	1966	0.8(A)	50 lb bags
(m) Castablock (P)	1965	1966	1.2(A)	50 lb bags
(m) Stirup Cement (P)	1965	1966	42.7(C)	50 lb bags
(m) Calcrete 30 (I)	1964	1970	7.8(C)	50 lb bags
MISCELLANEOUS PRODUCTS				
(d) Asbestos Rope (I)	1964	1965	100.0(C)	tied 100 ft coils-1/2-3" in diamater
(d) Permiseal (I) (fibers in emulsion)	1964	1975	Approx. 3.0(C)	5, 30 & 55 gal steel drums
(d, Weatherkote (P) (fibers in emulsion) (Thermal Kote since 1976)	1963	1977	Approx. 3.0(C)	5, 30 & 55 gal steel drums
(d) Duriseal (I) (fibers in emulsion)	1964	1973	Approx. 3.0(C)	5, 30 & 55 gal steel drums
(d) Thermal Coat (I) (fibers in emulsion)	1964	1964	Approx. 3.0(C)	5, 30 & 55 gal steel drums
(d) Air Check (P) (fibers in emulsion)	1963	1971	Approx. 3.0(C)	5, 30 & 55 gal steel drums
(m) Block Stick (P) (Prior to 1965 contained amosite 1965-1972, contained chrysotile)	1963	6/28/72	22.0(C)	6 gal steel containers
(m) Gunisul (P)	1963	1966	Approx. 1.0(A)	50 lb bags
(m) Mix A (P)	1963	6/27/72	6.0(C)	5, 30 & 55 gal steel drums

MISCELLANEOUS PRODUCTS	C-E START	ESTIMATED STOP	PERCENT AND TYPE OF ASBESTOS	CONTAINER
(m) Fibrous Adhesive (I)	1964	1965	13.1(C)	steel container
(m) Hytempt Flexible Compound (P)	1963	1972	30.0(C)	5 gal steel containers
(m) Expansion Joint Material (P)	1963	1966	100.0(A)	25 lb bags
INSULATING REFRACTORIES				
(m) Light Wate 22 (M)	1969	6/26/72	10.0(C)/ 27.0(C)	50 lb bags
MISCELLANEOUS PRODUCTS DISTRIBUTED BY C-E				
(d) K-12 Calcium Silicate Block	1963	1969	Unknown	
(d) K-12 Calcium Silicate Pipe Covering	1963	1969	Unknown	
(d) K-20 Insulating Block	1963	1969	Unknown	
(d) Kaylo 10 Calcium Silicate Block	1963	1969	Unknown	
(d) Kaylo Calcium Silicate Pipe Covering	1963	1969	Unknown	
(d) Kaylo 20 Block	1963	1969	Unknown	
(d) J-M Thermobestos Calcium Silicate Block	1963	1969	Unknown	
(d) J-M Thermobestos Calcium Pipe Covering	1963	1969	Unknown	

CAUTION: This product contains asbestos fibers. Excessive inhalation of asbestos may be harmful. If adequate ventilation is not possible, wear respirators approved by U.S. Bureau of Mines.

EXHIBIT II

MISCELLANEOUS PRODUCTS	C-E START	ESTIMATED STOP	PERCENT AND TYPE OF ASBESTOS	CONTAINER
(d) J-M Asbestos Cloth	1963	1969	Unknown	
(d) J-M Asbestos Gasketing	1963	1969	Unknown	

KEY

(P) - Port Kennedy, Pennsylvania
(I) - Aurora, Illinois
(M) - St. Louis, Missouri
(m) - manufactured
(d) - distributed
(C) - containing chrysotile
(A) - containing amosite

RPSJWORK4/O/ds
3/8/83