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SEP 14 1995

NO. 93 -03625-1

BARON & BUDD

HELEN GAMBRELL, Individually and
as the Special Administratrix of
the Estate of ROBERT GAMBRELL,
Deceased, Plaintiff

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IN THE DISTRICT COURT OF
DALLAS COUNTY, TEXAS

V.

THE ABER COMPANY, et al

162ND JUDICIAL DISTRICT



AMERICAN INSULATED WIRE'S ANSWERS TO INTERROGATORIES

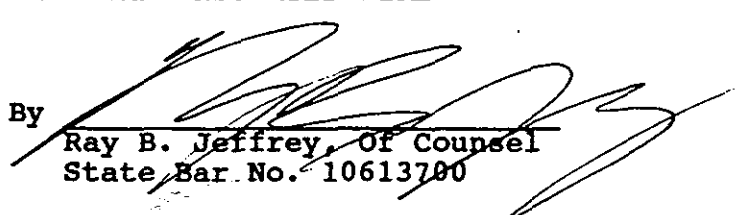
TO: Plaintiff, Helen Gambrell, by and through her attorney of
record, Mr. Peter A. Kraus, Baron & Budd, P.C., 3102 Oak Law
Ave., Suite 1100, Dallas, Texas 75219-4281.

COMES NOW Defendant, American Insulated Wire, Defendant in the
above entitled and numbered cause, pursuant to Texas Rules of Civil
Procedure, makes and files their answers to Plaintiff's
Interrogatories, previously propounded to them by Plaintiffs
herein.

Respectfully submitted,

HOLMES, HARRIS & JEFFREY, P. C.
Attorney for Defendant,
AMERICAN INSULATED WIRE

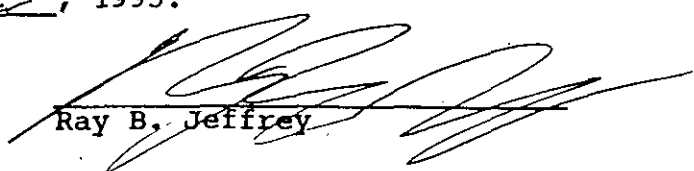
By


Ray B. Jeffrey, Of Counsel
State Bar No. 10613700

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Beaumont, TX 77704
(409) 832-8382 - PHONE
(409) 833-4240 - FAX

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and
foregoing has been furnished to all counsel of record on this the
12th day of September, 1995.


Ray B. Jeffrey

AMERICAN INSULATED WIRE'S ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER: Kenneth R. Strandberg
American Insulated Wire Corp.
36 Freeman Street
Pawtucket, RI
165 Beacon Dr. (Residence)
Kingstown, RI 02852
Vice-President, Engineering

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Yes.
American Insulated Wire Corp.
Rhode Island Corporation
Principal place of business - 36 Freeman St.,
Pawtucket, RI.
Service has previously been obtained.
Never held a Certificate of Authority to do business in Texas.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: A. Information regarding the testing of any AIW product was previously provided in response to discovery propounded in this case by Plaintiff in

Jefferson County. Also, please see documents provided in this defendant's pre-trial supplementation and designation of exhibits.

- B. Kenneth R. Strandberg (see above). Documents located in Pawtucket, Rhode Island.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and w/out waiving same, this defendant responds:

ANSWER: Information regarding the testing of any AIW product was previously provided in response to discovery propounded in this case by Plaintiff in Jefferson County. No such design change or modifications were made.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.

- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.
- F. The name, address, and job title of each person responsible for having drafted or issued the warning.
- G. The current location of any such printed material and the custodian thereof.
- H. The form in which such literature or printed material can be accessed, the manner in which such literature is indexed or stored.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: Information previously provided in response to discovery propounded in this case by Plaintiff in Jefferson County, Texas. No such warnings were published or distributed by this defendant.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Dallas County, Texas, is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.
- B. The date of notice of each claim.
- C. A description of the claim.
- D. The type of injuries allegedly sustained.
- E. The name and address of each attorney who represents each individual making a claim.
- F. The style and court number of each claim.
- G. The disposition of each claim that has been settled or taken to judgment.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. See this defendant's objection to Interrogatory No. 23 of the Jefferson County Interrogatories. Subject to these objections, and without waiving same, this defendant responds:

ANSWER: No

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: Not to our knowledge. These products were generally sold directly to manufacturing customers.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: This defendant has not employed any physicians or industrial hygienists.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.
- D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER: This defendant's attorneys and expert witnesses are aware of and have access to the general body of scientific literature on the subject, which literature is too extensive to list herein.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each such association or organization.
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date.
 - 2. The current location of such publications.
 - 3. The custodian of such publications.
 - 4. The method or manner in which such publications are maintained.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: Objection, and without waiving same, this defendant responds:

Not to our knowledge.

- A. N/A
- B. N/A
- C. N/A
- D. N/A

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.
- B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.
- D. The year each such written material or instruction was prepared and disclosed to potential consumers.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: None to our knowledge.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER: Yes. Information previously provided in response to discovery propounded in this case by Plaintiff in Jefferson County, Texas. See Jefferson Co. ROG #29-30. This information is being researched and will be supplemented as soon as it is obtained.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER:

- A. Unknown
- B. Unknown
- C. Unknown
- D. Unknown
- E. Unknown
- F. Unknown
- G. Unknown

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.**
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.**
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.**
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.**
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.**
- F. Who is the custodian of such information.**
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.**

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

- ANSWER:**
- A. Unknown**
 - B. Unknown**
 - C. Unknown**
 - D. Unknown**
 - E. Unknown**
 - F. Unknown**
 - G. Unknown**

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: AIW did not sell "asbestos material". AIW's products were sold on reels or spools and depending on size could have been packaged in cardboard containers. From 1936 to 1981. Printed information on outside of package, reel spools or attached tags would have included size of wire, voltage rating, temperature rating and manufacturer's identification. This defendant's company logos have been produced with its discovery supplementation and exhibit list.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting.
- B. The general subject matter discussed at each meeting.
- C. Who was in attendance at each meeting.
- D. Where and by whom the written minutes are presently maintained.
- E. By whom the minutes were taken and put into final format.
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

OBJECTION: Unduly burdensome. Not reasonably limited as to time and scope. Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: None to our knowledge.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

OBJECTION: Insofar as no subsidiaries or predecessors have been named as defendants in this case, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, this defendant responds:

ANSWER: AIW maintains computerized records of the sale of the products from 1980 to present. As to the sale of any AIW product to Keathley-Patterson, see computerized printout attacher to this defendant's Motion for Summary Judgment.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then

specify the different products by precise manufacturer's 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 year involved.

OBJECTION: Vague and ambiguous as to the term "applied". Subject to this objection and without waiving same, this defendant responds:

ANSWER: In general none of the AIW products identified would produce any significant amount of respirable asbestos dust when used for its normal, intended purposes.

A. N/A

B. N/A