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OMINSKY, JOSEPH & WELSH, P. C.

BY: EDWARD B. JOSEPH/FREDRIC L. GOLDFEIN

IDENTIFICATION NO. 02938/27799

16TH FLOOR, TWO PENN CENTER PLAZA

PHILADELPHIA, PA. 19102

(215)

ATTORNEY FOR Defendant ASBESTOS CORPORATION  
LIMITED

CLARENCE JOHNSON, et al.

v.

TURNER & NEWALL, et al.

IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN DIS-  
TRICT OF PENNSYLVANIA

No. 78-464

RESPONSE OF ASBESTOS CORPORATION LIMITED TO  
REQUESTS FOR ADMISSIONS

1. This request does not list the dates of alleged employment of the persons listed with Asbestos Corporation Limited nor are the middle initials, or other identifying criteria given. Asbestos Corporation Limited has searched what files exist respecting present and former employees and admits that it had former employees named:

Theodore Courture  
Leo Goupil  
Joseph Marceau

Thomas Provencal  
Ernest Rouleau  
William Bizier

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Albert Champagne  
Wilfred Fortier  
William Cooling  
Joseph Tremblay  
Louis Lessard

Joseph Adams  
Ludger Ainsley  
Eddy Lemieux  
Alexandre Nadeau

Asbestos Corporation Limited has no record of employment of:

Albert Simard  
Joseph Turcotte  
Arthur Ainsley

2. Asbestos Corporation Limited can neither admit nor deny Request No. 2. Asbestos Corporation Limited's records respecting events of 30 years ago are not complete. Asbestos Corporation Limited has no record of it having sent any medical files, x-rays, or x-ray reports, pathology reports or autopsy report to the Saranac Laboratory, the Trudeau Foundation, Saranac Lake, New York. Plaintiffs' request states "was sent" and it is assumed that plaintiffs mean that the material described was sent by Asbestos Corporation Limited.

3. Asbestos Corporation Limited can neither admit nor deny Request No. 3. The alleged letter of September 22, 1950, addressed to Mr. Alfred Penhale is 30 years old. Asbestos Corporation Limited does not retain all correspondence and proposals for such a period. Those files that do exist do not contain the letter identified in (a) nor the proposals identified in (b).

OMINSKY, JOSEPH & WELSH

BY:

  
EDWARD B. JOSEPH  
FREDRIC L. GOLDFEIN

Attorneys for Asbestos Corporation Limited

COMMONWEALTH OF PENNSYLVANIA :  
SS  
COUNTY OF PHILADELPHIA :

FREDRIC L. GOLDFEIN, being duly sworn according to law, deposes and says that he is attorney for Defendant Asbestos Corporation Limited; that he is authorized to and does take this affidavit on its behalf; and that he is acquainted with the facts set forth herein; and that the same are true and correct to the best of his knowledge, information and belief.

*Fred L. Goldfein*  
\_\_\_\_\_  
FREDRIC L. GOLDFEIN

SWORN TO AND SUBSCRIBED  
before me this *1st* day of

*August*, 1980.

*Deborah L. Stempen*  
\_\_\_\_\_  
NOTARY PUBLIC  
DEBORAH L. STEMPEN  
NOTARY PUBLIC, PHILA., PHILA. CO.  
My Commission Expires Dec. 15, 1980