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Attorneys for Defendant
CERTAINTEED CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SOLANO

IN RE: SOLANO COUNTY COMPLEX	)	No. 2830
ASBESTOS LITIGATION	)	
	)	CERTAINTEED CORPORATION'S
	)	RESPONSES TO PLAINTIFF'S
	)	FIRST SET OF
	)	INTERROGATORIES TO ALL
	)	DEFENDANTS

PROPOUNDING PARTY: Plaintiffs
RESPONDING PARTY: Defendant, CERTAINTEED CORPORATION
SET NUMBER: ONE (1)

Pursuant to Section 2030 of the California Code of Civil Procedure, defendant CertainTeed Corporation (hereinafter "defendant") hereby responds to plaintiff's interrogatories without conceding, in any fashion, that any of the interrogatories request information which is either relevant or admissible as evidence in this action.

Furthermore, defendant has not completed its investigation of the facts relating to this case and has not

1 completed its preparation for trial. As such, defendant's
2 response to the interrogatories propounded by plaintiff is given
3 without prejudice to defendant's right to produce evidence of any
4 and all subsequently discovered facts and/or documents and to
5 rely on any and all subsequently discovered facts and/or
6 documents at the time of trial or at any other time.

7
8 GENERAL OBJECTIONS

9 A. Defendant objects to the interrogatories to the
10 extent that they request information and the identification of
11 documents which are protected by any privilege, including but not
12 limited to the attorney-client privilege, the joint-defense
13 privilege, and/or the work-product doctrine, and defendant and
14 its counsel hereby asserts such privileges.

15 B. The information sought by many of the
16 interrogatories is so remote in time so as to be of little or no
17 value to plaintiff. Indeed, the interrogatories seek information
18 created many years ago. As requested, the interrogatories will
19 be burdensome, oppressive, and harassing to defendant with little
20 or no benefit flowing to plaintiff. Notwithstanding the
21 foregoing, defendant will attempt to respond to plaintiff's
22 interrogatories, subject to the other applicable objections set
23 forth herein, as fully as possible.

24 C. Plaintiff's unreasonable delay in serving these
25 interrogatories and commencing litigation against defendant has
26 prejudiced defendant's ability to respond to this litigation, in
27 general, and these interrogatories, in particular.
28 Notwithstanding the foregoing, defendant will attempt to respond

1 to plaintiff's interrogatories, subject to the other applicable
2 objections set forth herein, as fully as possible.

3 D. Defendant will make reasonable efforts to respond
4 to each interrogatory, to the extent that it has not been
5 objected to, as defendant understands and interprets the
6 interrogatory. If plaintiff subsequently asserts an
7 interpretation of any interrogatory which differs from that of
8 defendant, defendant reserves its right to supplement its
9 responses accordingly.

10 E. Defendant hereby objects to the definitions of
11 plaintiff insofar as they are oppressive, overly broad, and
12 burdensome, and insofar as they are vague and ambiguous.
13 Defendant also objects to the inclusion of conjunctive or
14 disjunctive definitions as in contravention of Section 2030(f)(5)
15 of the California Code of Civil Procedure.

16

17 INTERROGATORIES AND SPECIFIC RESPONSES

18 INTERROGATORY NO. 1:

19 With respect to the individual verifying these answers
20 on your behalf, state the following:

- 21 a. their name;
22 b. their present business address;
23 c. their present job title;
24 d. their of first employment with you, and the dates
25 and titles of each job position they have held while they were
26 employed by you.

27

28 RESPONSE TO INTERROGATORY NO. 1:

29 Subject to the aforementioned general objections,
30 defendant responds as follows:

- 31 a. Curtis M. Pontz, Esq.

32 / / /

- 1 b. CERTAINTEED CORPORATION
2 750 E. Swedesford Road
3 Valley Forge, Pennsylvania 19482
4 c. Senior Counsel and Assistant Secretary
5 d. First employed by CertainTeed in November, 1975.

6 INTERROGATORY NO. 2:

- 7 State whether YOU are a corporation. If so, state:
8 a. YOUR full corporate name;
9 b. the state of incorporation;
10 c. the date of incorporation;
11 d. the address of YOUR principal place of business;
12 e. if YOU are a wholly-owned or if more than five (5)
13 percent of the ownership interest of YOUR COMPANY is owned by
14 another business entity, state that entity's name and principal
15 place of business.

16 RESPONSE TO INTERROGATORY NO. 2:

17 Subject to the aforementioned general objections,
18 defendant responds in the affirmative.

19 a. CertainTeed Corporation (hereinafter "CertainTeed"
20 or "defendant").

21 b. Originally incorporated in Maryland in 1917, most
22 recently incorporated in Delaware on May 31, 1988.

23 c. May 31, 1988.

24 d. Principal place of business in 750 E. Swedesford
25 Road, Valley Forge, Pennsylvania 19482.

26 e. Compagnie de Saint-Gobain, Les Miroirs, 18 avenue
27 d'Alsace, 92400 Courbevo ie FRANCE

28 INTERROGATORY NO. 3:

29 Has THIS DEFENDANT ever been identified, known, or done
30 business under any other name? If so, please state such name or
31 names and the time period during which THIS DEFENDANT was so
32 known or identified.

33 / / /

34 / / /

1 RESPONSE TO INTERROGATORY NO. 3:

2 Subject to the aforementioned general objections,
3 defendant responds as follows: CertainTeed Products Corporation
4 (prior to May 28, 1976).

5 INTERROGATORY NO. 4:

6 State whether YOU have ever been registered or qualified
7 to do business in the State of California. If so, state the date
8 YOU became qualified to conduct business in the State of
9 California.

9 RESPONSE TO INTERROGATORY NO. 4:

10 Subject to the aforementioned general objections,
11 defendant responds as follows: Yes. April 16, 1917.

12 INTERROGATORY NO. 5:

13 Does THIS DEFENDANT currently have, or has THIS
14 DEFENDANT had a department, division, subdivision, branch or
15 group responsible for the design, development, manufacture,
16 testing and use of ASBESTOS-CONTAINING PRODUCT(S). If so, state:
17 a. the name of each present or former corporate
18 department, division, subdivision, branch or group.
19 b. the IDENTITY of the person most knowledgeable about
20 such department, division, subdivision, branch or group.

18 RESPONSE TO INTERROGATORY NO. 5:

19 Subject to the aforementioned general objections,
20 although defendant has made and sold asbestos-bearing products,
21 it has never had a department, etc. which was responsible for the
22 design, development, testing, manufacture, and use of only
23 asbestos-containing products, nor has it ever had a department,
24 etc. which has ever been responsible for testing the health
25 aspects of such products.

26 INTERROGATORY NO. 6:

27 Has THIS DEFENDANT engaged in the MARKETING of ASBESTOS-
28 CONTAINING PRODUCT(S) comprised in whole or in part of amosite
asbestos fiber; if so, please state:

1 a. the trade, brand name, and/or generic name of each
type of product;
2 b. the date(s) THIS DEFENDANT first MARKETed each type
of product;
3 c. the date(s) THIS DEFENDANT ceased MARKETing each
type of product;
4 d. a general description of the chemical composition
of each type of product, including:
5 (i) the type(s) and/or grade(s) of RAW ASBESTOS
FIBER contained in each type of product;
6 (ii) the quantitative percentage of the type(s) of
RAW ASBESTOS FIBER in each type of product;
7 (iii) any change(s) in the quantitative percentages
of the type(s) of RAW ASBESTOS FIBER in each type of product;
8 e. the NATURE of each type of product;
9 f. a description of any wording, markings and/or logo
on each type of product;
10 g. the recommended use(s) of each type of product,
including temperature limits;
11 h. the name(s) of the manufacturer(s) of each type of
product;
12 i. the name(s) and address(es) of the supplier(s) of
the amosite asbestos fiber used in each type of product;
13 j. the IDENTITY of the person(s) most knowledgeable
concerning the purchase of amosite asbestos fiber by THIS
DEFENDANT.

14
15 RESPONSE TO INTERROGATORY NO. 6:

16 Subject to the aforementioned general objections,
17 defendant responds as follows: No.

18 INTERROGATORY NO. 7:

19 Has THIS DEFENDANT engaged in the MARKETing of amosite
asbestos fiber; if so, please state:

20 a. the name and location of each amosite asbestos mine
which THIS DEFENDANT presently operates, has operated, or in
21 which THIS DEFENDANT has or had an ownership interest, including
the dates of such ownership, and the grade of amosite asbestos
22 fiber mined;
23 b. the date(s) THIS DEFENDANT first MARKETed amosite
asbestos fiber;
24 c. the date(s) THIS DEFENDANT ceased MARKETing amosite
asbestos fiber;
25 d. the grade(s) of such amosite asbestos fiber
MARKETed by THIS DEFENDANT;
26 e. the recommended use(s) of each grade of such
amosite asbestos fiber, including any temperature limits;
27 f. the name(s) and address(es) of the supplier(s) of
amosite asbestos fiber to THIS DEFENDANT.

28 / / /

1 RESPONSE TO INTERROGATORY NO. 7:

2 Subject to the aforementioned general objections,
3 defendant responds as follows: No.

4 INTERROGATORY NO. 8:

5 Has THIS DEFENDANT engaged in the MARKETING of ASBESTOS-
6 CONTAINING PRODUCTS comprised in whole or in part of chrysotile
7 asbestos fiber; if so, please state:

- 8 a. the trade, brand name and/or generic name of each
9 type of product;
- 10 b. the date(s) THIS DEFENDANT first MARKETed each type
11 of product;
- 12 c. the date(s) THIS DEFENDANT ceased MARKETING each
13 type of product;
- 14 d. a general description of the chemical composition
15 of each type of product, including:
 - 16 (i) the type(s) and grade(s) of asbestos fiber
17 contained in each type of product;
 - 18 (ii) the quantitative percentage of the types of
19 asbestos fiber in each type of product;
 - 20 (iii) any change(s) in the quantitative percentages
21 of the type(s) of asbestos fiber in each type of product;
- 22 e. the NATURE of each type of product;
- 23 f. a description of any wording, markings, and/or logo
24 on each type of product;
- 25 g. the recommended use(s) of each type of product,
26 including temperature limits;
- 27 h. the name of the manufacturer of each type of
28 product;
- i. the name(s) and address(es) of the supplier(s) of
the chrysotile asbestos fiber used in each type of product;
- j. the IDENTITY of the person(s) most knowledgeable
concerning the purchase of chrysotile asbestos fiber by THIS
DEFENDANT.

20 RESPONSE TO INTERROGATORY NO. 8:

21 Subject to the aforementioned general objections,
22 defendant responds as follows:

23 a. - g.

- 24 1. Asbestos Roof Coating - First placed on
25 the market prior to 1930. Withdrawn from the market in 1982 due
26 to economic considerations (poor profit margins). It was
27 composed of asphalt, mineral spirits and approximately 6.7% 7M
28 chrysotile asbestos fiber. It was designed for use as a coating

1 for smooth surface asphalt roofs, and was sold in one-gallon
2 friction top steel cans, five-gallon steel pails, and 30- and
3 55-gallon steel drums. The CertainTeed name appeared on the
4 container. It was a viscous black liquid that could be spread
5 with a brush or sprayed, and any atmospheric temperature was
6 recommended.

7 2. Blind Nailing Cement - First placed on
8 the market prior to 1930. Withdrawn from the market in 1979 due
9 to economic considerations (poor profit margins). It was
10 composed of asphalt mineral spirits and approximately 13% 7M
11 chrysotile asbestos fiber. It was designed for use in sealing
12 the laps of roll roofing applied with no exposed nails, and was
13 sold in one-gallon friction top steel cans, five-gallon steel
14 pails, and 30- and 55-gallon steel drums. The CertainTeed name
15 appeared on the container. It was a viscous black liquid that
16 could be applied with a stiff brush or trowel, and any
17 atmospheric temperature was recommended.

18 3. Plastic Cement - First placed on the
19 market prior to 1930. Withdrawn from the market in 1983 due to
20 economic consideration (poor profit margins). It was composed of
21 asphalt, mineral spirits, pulverized limestone and approximately
22 18% 7K chrysotile asbestos fiber and 18% 7M chrysotile asbestos
23 fiber. It was designed for flashing, caulking, heavy duty roof
24 repairs, and patching roof flashings, and was sold in one-pint,
25 one-quart, 1/2-gallon, and one-gallon friction top steel cans,
26 three- and five-gallon steel pails, and 30- and 55-gallon steel
27 drums. The CertainTeed name appeared on the container. It was a
28 black mastic that could be applied with a trowel, and any

1 atmospheric temperature was recommended.

2 4. Sealing Cement - First placed on the
3 market prior to 1930. Withdrawn from the market in 1976 due to
4 economic considerations (poor profit margins). It was composed
5 of asphalt, mineral spirits, and approximately 29% 7M chrysotile
6 asbestos fiber. It was designed for sealing down asphalt
7 shingles and was sold in one-gallon friction top steel cans,
8 five-gallon steel pails, and 30- and 55-gallon steel drums. The
9 CertainTeed name appeared on the container. It was a black
10 mastic that could be applied with a trowel, and any atmospheric
11 temperature was recommended.

12 5. Cold Process Cement - First placed on the
13 market in approximately 1940. Withdrawn from the market in 1967
14 (replaced by Cold Process Asphalt). It was composed of asphalt,
15 mineral spirits, and approximately 6.7% 7M chrysotile asbestos
16 fiber. It was designed for use in applying rolls of smooth
17 roofing to obtain a built-up roof and was sold in one-gallon
18 friction top steel cans, five-gallon steel pails, and 30- and
19 55-gallon steel drums. The CertainTeed name appeared on the
20 container. It was a viscous black liquid that could be spread
21 with a brush or sprayed, and any atmospheric temperature was
22 recommended.

23 6. Cold Process Asphalt - First placed on
24 the market in 1967. Withdrawn from the market in 1983 due to
25 economic considerations (poor profit margins). It was composed
26 of asphalt, mineral spirits, and approximately 6.7% 7M chrysotile
27 asbestos fiber. Cold process asphalt was the name given to "cold
28 process cement" subsequent to 1967. It was sold in one-gallon

1 friction top steel cans, five-gallon steel pails, and 30- and
2 55-gallon steel drums. The CertainTeed name appeared on the
3 container. It was a viscous black liquid that could be spread
4 with a brush or sprayed, and any atmospheric temperature was
5 recommended.

6 7. Stabilized Roof Coating - First placed on
7 the market in approximately 1940. Withdrawn from the market in
8 1967 due to economic considerations (poor profit margins). It
9 was composed of asphalt, mineral spirits, and approximately 6.7%
10 7M chrysotile asbestos fiber. It was designed for coating cold
11 process smooth surface built-up asphalt roofs and was sold in
12 one-gallon friction top steel cans, five-gallon steel pails, and
13 30- and 55-gallon steel drums. The CertainTeed name appeared on
14 the container. It was a viscous black liquid that could be
15 spread with a brush or sprayed, and any atmospheric temperature
16 was recommended.

17 8. Wet Seal Plastic Cement - First placed on
18 the market in 1961. Withdrawn from the market in 1983 due to
19 economic considerations (poor profit margins). It was composed
20 of asphalt, mineral spirits, an amine wetting agent, pulverized
21 limestone and approximately 18% 7K chrysotile asbestos and 18% 7M
22 chrysotile asbestos. It was designed for use in providing
23 adhesion to wet or damp surfaces in making heavy duty repairs to
24 wet roofs and was sold in one-gallon friction top steel cans,
25 five-gallon steel pails, and 30- and 55-gallon steel drums. The
26 CertainTeed name appeared on the container. It was a black mastic
27 that could be applied with a trowel, and any atmospheric
28 temperature was recommended.

1 9. Asphalt Fibered Emulsion - First placed
2 on the market some time during the 1950's. Withdrawn from the
3 market in 1983 due to economic considerations (poor profit
4 margins). It was composed of asphalt, water, clay, electrolyte
5 and an unknown quantity of asbestos fiber. It was designed for
6 coating smooth surface asphalt roofs and was sold in one-gallon
7 friction top steel cans, five-gallon steel pails, and 30- and
8 55-gallon steel drums. The CertainTeed name appeared on the
9 container. It was a viscous black liquid that could be spread
10 with a brush or sprayed, and any atmospheric temperature was
11 recommended.

12 10. Fibered Aluminum Roof Coating - First
13 placed on the market in 1951. Withdrawn from the market in 1979
14 due to economic considerations (poor profit margins). It was
15 composed of asphalt, mineral spirits, aluminum powder, and an
16 unknown quantity of asbestos fiber. It was designed for coating
17 smooth surface asphalt roofs and was sold in one-gallon friction
18 top steel cans, five-gallon steel pails, and 30- and 55-gallon
19 steel drums. The CertainTeed name appeared on the container. It
20 was a viscous aluminum colored liquid that could be spread with a
21 brush or roller, and any atmospheric temperature was recommended.

22 11. Asphalt Foundation Coating - First placed
23 on the market in approximately 1940. Withdrawn from the market
24 in 1981 due to economic considerations (poor profit margins). It
25 was composed of asphalt, mineral spirits, and approximately 6.7%
26 7M chrysotile asbestos fiber. It was designed for coating the
27 exterior of foundations before backfilling, and was sold in one-
28 gallon friction top steel cans, five-gallon steel pails, and

1 30- and 55-gallon steel drums. The CertainTeed name appeared on
2 the container. It was a viscous black liquid that could be
3 spread with a brush or sprayed, and any atmospheric temperature
4 was recommended.

5 12. No. 15 Perforated Saturated Asbestos Felt

6 First placed on the market in 1968. Withdrawn from the market in
7 1976 due to lack of demand for the product. It was composed of
8 asphalt, organic fiber, and 58% asbestos fiber (type and grade
9 unknown). It was designed for use as plys for built-up roofs and
10 flashing, and packaged with a kraft paper wrapper, was not color
11 coded, and contained no logo or markings except for laying lines
12 of aluminum paint. The CertainTeed name appeared on the wrap.
13 It was a black roll good which was applied with hot asphalt, and
14 any atmospheric temperature was recommended.

15 13. Asbestos Base Sheet - First placed on the

16 market in 1968. Withdrawn from the market in 1976 due to lack of
17 demand for the product. It was composed of asphalt, organic
18 fiber, glass fiber, pulverized limestone, pulverized talc, and
19 20% asbestos fiber (type and grade unknown). It was designed for
20 use as the first ply in applying a built-up roof, and packaged
21 with a kraft paper wrapper, was not color coded, and contained no
22 logo or other marking except for laying lines of orange-red
23 paint. The CertainTeed name appeared on the wrap. It was a
24 black roll good which was nailed or applied with hot asphalt, and
25 any atmospheric temperature was recommended.

26 14. Asbestos Base Flashing - First placed on

27 the market in 1968. Withdrawn from the market in 1976 due to
28 lack of demand for the product. It was composed of asphalt,

1 organic fiber, pulverized limestone, pulverized talc, 19%
2 asbestos fiber (type and grade unknown), and either glass, hemp,
3 or jute fiber. It was designed for use as one ply in installing
4 flashing and packaged with a kraft paper wrapper, was not color
5 coded, and contained no logo or other markings. The CertainTeed
6 name appeared on the wrap. It was a black roll good which was
7 applied with hot asphalt, and any atmospheric temperature was
8 recommended.

9 15. Asbestos Cap Sheet (mineral surfaced) -
10 First placed on the market in 1973. Withdrawn from the market in
11 1976 due to lack of demand for the product. It was composed of
12 asphalt, organic fiber, pulverized limestone, pulverized talc,
13 coarse crushed rock, and 13.8% asbestos fiber (type and grade
14 unknown). It was designed for use as the top ply on build-up
15 roofs and packaged with a kraft wrapper, was not color coded, and
16 contained no logo or other markings except for a laying line of
17 orange-red paint. The CertainTeed name appeared on the wrap. It
18 was a black roll good which was applied with hot asphalt and any
19 atmospheric temperature was recommended.

20 16. Asbestos-Cement Siding Shingles - First
21 placed on the market in approximately 1950. Withdrawn from the
22 market in the mid-1960's due to economic considerations (poor
23 profit margins). Asbestos-cement siding shingles were flat slabs
24 which came in various colors (type, grade, and amount of asbestos
25 fiber unknown). They were designed for use on the exterior of
26 homes and were nailed to the exterior surface. They were
27 supplied in packages having a corrugated fiberboard band and
28 sides held in place by two wire ties. The CertainTeed name

1 appeared on the band, and any atmospheric temperature was
2 recommended.

3 17. Asbestos-Cement Pipe (may have carried
4 the brand name Fluid-Tite) - First placed on the market June 1,
5 1962. CertainTeed currently manufactures and sells asbestos-
6 cement pipe. The asbestos fiber is bound into the asbestos-
7 cement pipe by a combination of cement, silica, and water through
8 an autoclave (high pressure steam atmosphere) curing process. It
9 contains the following amounts of asbestos by weight:

10	Pressure Pipe	15 to 20%
11	Sewer Pipe	10 to 15%
12	Irrigation Pipe	11 to 20%

13 Of the total asbestos content of the asbestos-cement pipe,
14 anywhere from 0% to 24% has been crocidolite (blue) fiber by
15 weight, with the remaining fiber being chrysotile (white)
16 depending on the type of pipe. Asbestos-cement pipe is used for
17 the underground transmission of water and sewage. No packaging
18 has been used in connection with the product. The sewer pipe
19 contains black lettering, including the name "CertainTeed," the
20 pressure pipe contains either black or orange lettering,
21 including the name "CertainTeed," and the irrigation pipe has
22 black lettering including the name "CertainTeed." It was
23 installed in the form in which it is sold except to the extent
24 that it may require machining in order to meet a specific length.
25 The temperature limit is 200°F.

26 18. Glass Fiber Blanket Insulation Faced with
27 Asbestos Paper for Railroad Car Application - First placed on the
28 market by Gustin-Bacon Manufacturing Company in 1945. Withdrawn

1 from the market in 1947 because of poor moisture vapor
2 transmission and as a result of the determination that there was
3 no need for an incombustible facing. It was composed of nine-
4 micron glass fiber blanket and reinforced asbestos paper facing.
5 It was intended solely for use in insulating ceilings, walls, and
6 floors of railroad passenger cars, and was packaged in cardboard
7 or wrapped in heavy kraft paper. It was applied on railway cars
8 and placed against the ceiling, walls, and floors. No writing is
9 believed to have been on the product. The content of any writing
10 on the packaging is unknown and the recommended temperature range
11 in unknown.

12 19. Flexible Trainline - First placed on the
13 market by Gustin-Bacon Manufacturing Company in 1945. First
14 manufactured and sold by CertainTeed in 1966. Withdrawn from the
15 market in 1970 due to lack of demand for the product. It was
16 composed of nine-micron glass fiber blanket, resin bonded, and
17 adhered with adhesive to neoprene-coated asbestos cloth. It was
18 intended solely for use in insulating railroad passenger car
19 steam lines. It was packaged in cardboard or wrapped in heavy
20 kraft paper, and was installed by lacing the insulation onto the
21 passenger car steam lines with copper wire affixed to hooks which
22 were fastened to the insulation jacketing. No writing is
23 believed to have been on the product. The content of any writing
24 on the packaging is unknown and the recommended temperature limit
25 was 300°F.

26 h. CertainTeed was the manufacturer of the products
27 cited in subparts a. through g., except as follows:

28 -Asbestos Roof Coating - made from 1977 to 1982 by APOC;

1 -Blind Nailing Cement - made from 1977 to 1979 by APOC;
2 -Plastic Cement - made from 1977 to 1983 by APOC;
3 -Cold Process Asphalt - made from 1977 to 1983 by APOC;
4 -Wet Seal Plastic Cement - made from 1977 to 1983 by
5 APOC;
6 -Asphalt Fibered Emulsion made by Chevron Asphalt
7 Company from 1950's to 1983;
8 -Fibered Aluminum Roof Coating made by Chevron Asphalt
9 Company from 1951 to 1979;
10 -Asphalt Foundation Coating - made from 1977 to 1981 by
11 APOC;
12 -No. 15 Perforated Saturated Asbestos Felt, Asbestos
13 Base Sheet, Asbestos Base Flashing - made from 1968 to 1972 by
14 GAF;
15 -Flexible Trainline - made from 1945 to 1966 by Gustin-
16 Bacon Manufacturing Company;
17 -Glass fiber blanket insulation jacketed with asbestos
18 paper for railroad car application - made from 1945 to 1947 by
19 Gustin-Bacon Manufacturing Company; and
20 -Asbestos-Cement Siding Shingles - manufacturer unknown.
21 In addition, defendant may have purchased extremely
22 small quantities of asbestos-cement pipe from Johns-Manville and
23 Flintkote on isolated occasions, but defendant has no record in
24 that regard.
25 1. The asbestos fibers used in roof coatings and
26 cements were supplied by Johns-Manville until the mid-1960's and
27 by Carey-Canadian Mines from the mid-1960's through 1977.
28 Unknown as to roll roofing products, asbestos-cement siding

1 shingles, Flexible Trainline, and glass fiber blanket insulation
2 faced with asbestos paper for railroad car application.

3 The following companies have been sources of asbestos
4 fiber which has been incorporated into the asbestos-cement pipe
5 manufactured by CertainTeed in California:

6 Cassiar Resources
7 Griqueland
8 Cape Asbestos
9 General Mining
10 Russian Fiber
11 Asbestos Corp.
12 Johns-Manville
13 Jefferson Lake
14 Pacific Asbestos
15 Calaveras Asbestos
16 Bell Asbestos Mines
17 Turner Asbestos Fiber Ltd.

18 j. Fibers used in roof coatings and cements: Jack Fly
19 (retired from CertainTeed).

20 Fibers used in asbestos-cement pipe: Charles Striegel
21 (retired from CertainTeed).

22 INTERROGATORY NO. 9:

23 Has THIS DEFENDANT engaged in the MARKETing of
24 chrysotile asbestos fiber; of so, please state:

25 a. the name and location of each chrysotile asbestos
26 mine which THIS DEFENDANT presently operates, has operated, or in
27 which THIS DEFENDANT has or had an ownership interest, including
28 the dates of such ownership, and the grade of chrysotile asbestos
29 fiber mined;

30 b. the date(s) THIS DEFENDANT first MARKETed
31 chrysotile asbestos fiber;

32 c. the date(s) THIS DEFENDANT ceased MARKETing
33 chrysotile asbestos fiber;

34 d. the grade(s) of such chrysotile asbestos fiber
35 MARKETed by THIS DEFENDANT;

36 e. the recommended use(s) of each grade of such
37 chrysotile asbestos fiber, including temperature limits;

38 f. the name(s) and address(es) of the supplier(s) of
39 chrysotile asbestos fiber to THIS DEFENDANT.

40 / /

41 / /

1 RESPONSE TO INTERROGATORY NO. 9:

2 Subject to the aforementioned general objections,
3 defendant responds as follows: No.

4 INTERROGATORY NO. 10:

5 Has THIS DEFENDANT engaged in the MARKETing of ASBESTOS-
6 CONTAINING PRODUCTS comprised in whole or in part of crocidolite
7 asbestos fiber; if so, please state:
8 a. the trade, brand name and/or generic name of each
9 type of product;
10 b. the date(s) THIS DEFENDANT first MARKETed each type
11 of product;
12 c. the date(s) THIS DEFENDANT ceased MARKETing each
13 type of product;
14 d. a general description of the chemical composition
15 of each type of product, including:
16 (i) the type(s) and grade(s) of asbestos fiber
17 contained in each type of product;
18 (ii) the quantitative percentage of the types of
19 fiber in each type of product;
20 (iii) any change(s) in the quantitative percentages
21 of the type(s) of asbestos fiber in each type of product;
22 e. the NATURE of each type of product;
23 f. a description of any wording, markings, and/or logo
24 on each type of product;
25 g. the recommended use(s) of each type of product,
26 including temperature limits;
27 h. the name of the manufacturer of each type of
28 product;
i. the name(s) and address(es) of the supplier(s) of
the crocidolite asbestos fiber used in each type of product;
j. the IDENTITY of the person(s) most knowledgeable
concerning the purchase of crocidolite asbestos fiber by THIS
DEFENDANT.

20 RESPONSE TO INTERROGATORY NO. 10:

21 Subject to the aforementioned general objections,
22 defendant responds as follows:

23 a - h:

24 Asbestos-Cement Pipe (may have carried the brand name
25 Fluid-Tite) - First placed on the market June 1, 1962.
26 CertainTeed currently manufactures and sells asbestos-cement
27 pipe. The asbestos fiber is bound into the asbestos-cement pipe
28 by a combination of cement, silica, and water through an

1 autoclave (high pressure steam atmosphere) curing process. It
2 contains the following amounts of asbestos by weight:

3	Pressure Pipe	15 to 20%
4	Sewer Pipe	10 to 15%
5	Irrigation Pipe	11 to 20%

6 Of the total asbestos content of the asbestos-cement pipe,
7 anywhere from 0% to 24% has been crocidolite (blue) fiber by
8 weight, with the remaining fiber being chrysotile (white)
9 depending on the type of pipe. Asbestos-cement pipe is used for
10 the underground transmission of water and sewage. No packaging
11 has been used in connection with the product. The sewer pipe
12 contains black lettering, including the name "CertainTeed," the
13 pressure pipe contains either black or orange lettering,
14 including the name "CertainTeed," and the irrigation pipe has
15 black lettering including the name "CertainTeed." It was
16 installed in the form in which it is sold except to the extent
17 that it may require machining in order to meet a specific length.
18 The temperature limit is 200°F.

19 i. Griqueland, Cape Asbestos, General Mining, and
20 Turner Asbestos Fibre Ltd.

21 j. Charles Striegel (retired from CertainTeed).

22 INTERROGATORY NO. 11:

23 Has THIS DEFENDANT engaged in the MARKETING of
24 crocidolite asbestos fiber; of so, please state:

25 a. the name and location of each crocidolite asbestos
26 mine which THIS DEFENDANT presently operates, has operated, in
the, and/or in which THIS DEFENDANT has or had an ownership
interest, including the dates of such ownership, and the grade of
asbestos fiber mined;

27 b. the date(s) THIS DEFENDANT first MARKETed
crocidolite asbestos fiber;

28 c. the date(s) THIS DEFENDANT ceased MARKETING
crocidolite asbestos fiber;

d. the grade(s) of such crocidolite asbestos fiber
MARKETed by THIS DEFENDANT;

1 e. the recommended use(s) of each grade of such
crocidolite asbestos fiber, including temperature limits;
2 f. the name(s) and address(es) of the supplier(s) of
crocidolite asbestos fiber to THIS DEFENDANT.

3 RESPONSE TO INTERROGATORY NO. 11:

4 Subject to the aforementioned general objections,
5 defendant responds as follows: No.

6 INTERROGATORY NO. 12::

7 Does or did THIS DEFENDANT have a controlling ownership
8 interest in any COMPANY which MARKETED ASBESTOS-CONTAINING
PRODUCT(S); if so, please state:

9 a. the name of such COMPANY;
10 b. the date of incorporation of such COMPANY;
11 c. the state of incorporation of such COMPANY;
12 d. the date such interest was acquired;
13 e. the date such interest was changed or terminated,
if applicable;

14 f. the name and location of each facility of such
COMPANY;

15 g. the name of each type of ASBESTOS-CONTAINING
16 PRODUCT(S) manufactured, processed, and/or assembled by such
17 COMPANY.

18 RESPONSE TO INTERROGATORY NO. 12:

19 Subject to the aforementioned general objections, on
20 June 1, 1962, defendant purchased from Keasbey & Mattison Company
21 (pursuant to an Agreement between Keasbey & Mattison Company and
22 Certain-teed Products Corporation, dated April 1, 1962) its four
23 asbestos-cement pipe plants and all of its machinery, fixtures,
24 tools and supplies which related to and had been used by Keasbey
25 & Mattison exclusively in the making of asbestos-cement pipe.
26 Defendant's purchase of Keasbey & Mattison's assets was limited
27 to the four aforementioned asbestos-cement pipe plants and
28 related machinery, etc.

Defendant did not purchase any Keasbey & Mattison assets
which had been used to manufacture insulation, textile or roofing
materials. At the time of the purchase of the Keasbey & Mattison

1 asbestos-cement pipe assets, there was no general assumption of
2 liability by defendant nor did defendant specifically assume
3 liability for claims growing out of the sale of any Keasbey &
4 Mattison products manufactured prior to the date of purchase by
5 defendant of Keasbey & Mattison's asbestos-cement pipe assets.
6 The asbestos-cement pipe made by defendant was and is used solely
7 for the underground transmission of water and sewage, was not and
8 is not used in conjunction with insulation material, and is
9 typically installed by pipeline contractors.

10 On July 1, 1966, defendant, through merger, acquired the
11 Gustin-Bacon Manufacturing Company (pursuant to an Agreement and
12 Articles of Merger between Certain-teed Products Corporation and
13 Gustin-Bacon Manufacturing Company, dated April 19, 1966). At
14 the time Gustin-Bacon Manufacturing Company merged into
15 defendant, all the ordinary liabilities of the former entity were
16 assumed by defendant. The only asbestos-bearing products with
17 which Gustin-Bacon ever had any nexus were two specialty
18 insulation products sold exclusively to railroad companies. One
19 of these products, Flexible Trainline, which was made of fiber
20 glass which had an asbestos cloth facing, was used to insulate
21 steam lines on railway passenger cars, and the other, which had
22 no trade name, was a glass fiber blanket faced with asbestos
23 paper (referred to herein as "glass fiber blanket insulation
24 faced with asbestos paper") which was used to insulate the walls,
25 floors, and ceilings of railway passenger cars. Other than the
26 two aforesaid specialty insulation products, defendant has never
27 made or sold any asbestos-bearing insulation products whatsoever.

1 The incorporation dates of Keasbey & Mattison and the
2 Gustin-Bacon Manufacturing Company are unknown. Gustin-Bacon
3 Manufacturing Company was incorporated in Delaware. The state of
4 incorporation of Keasbey & Mattison is unknown. The asbestos-
5 cement pipe plants acquired from Keasbey & Mattison were located
6 in Ambler, Pennsylvania; St. Louis, Missouri; Hillsboro, Texas;
7 and Santa Clara, California. The plant acquired from Gustin-
8 Bacon at which specialty railroad insulation products were made
9 was located in Kansas City, Kansas.

10 Notwithstanding the information furnished in response to
11 this interrogatory concerning Keasbey & Mattison and the Gustin-
12 Bacon Manufacturing Company, defendant never had a controlling
13 ownership interest in either company or any other company which
14 marketed asbestos-containing products.

15 INTERROGATORY NO. 13:

16 Does or did THIS DEFENDANT have a controlling ownership
17 in any COMPANY that MARKETED RAW ASBESTOS FIBER; if so, please
18 state:

- 18 a. the name of such COMPANY;
19 b. the date of incorporation or charter of such
20 COMPANY;
19 c. the state or country of incorporation of such
20 COMPANY;
21 d. the date such interest was acquired;
21 e. the dates such interest changed or terminated, if
22 applicable;
22 f. the name and location of each asbestos mine owned
23 by such COMPANY;
23 g. the grade and type of RAW ASBESTOS FIBER mined at
24 each mine.

24 RESPONSE TO INTERROGATORY NO. 13:

25 Subject to the aforementioned general objections,
26 defendant responds as follows: No.

27 INTERROGATORY NO. 14:

28 Has THIS DEFENDANT warehoused any RAW ASBESTOS FIBER or
ASBESTOS-CONTAINING PRODUCT(S) in the State of California; if so
please state:

1 a. the address of each warehouse facility;
2 b. the year(s) THIS DEFENDANT utilized each facility;
3 c. the IDENTITY of the custodian of warehousing
4 records.

5 RESPONSE TO INTERROGATORY NO. 14:

6 Subject to the aforementioned general objections,
7 defendant responds as follows: No.

8 INTERROGATORY NO. 15:

9 Has THIS DEFENDANT owned or operated facilities anywhere
10 in the United States in which ASBESTOS-CONTAINING PRODUCT(S) have
11 been manufactured, processed and/or assembled; if so, state:
12 a. the address of each such facility, including city
13 and state.

14 RESPONSE TO INTERROGATORY NO. 15:

15 Asbestos-cement pipe:

16 Ambler, PA
17 St. Louis, MO
18 Hillsboro, TX
19 Santa Clara, CA
20 Riverside, CA

21 Specialty Insulation Products for Railroad Industry:

22 Kansas City, KS

23 CertainTeed roofing plants:

24 Avery, OH
25 Chicago Heights, IL
26 Dallas, TX
27 East St. Louis, IL
28 Kansas City, MO
 Marseilles, IL
 Minneapolis, MN
 Niagara Falls, NY
 Oxford, NC

1 Richmond, CA
2 Savannah, GA
3 Shakopee, MN
4 Tacoma, WA
5 York, PA

6 INTERROGATORY NO. 16:

7 If THIS DEFENDANT owned or operated facilities in which
8 ASBESTOS-CONTAINING PRODUCT(S) have been manufactured, processed
and/or assembled, please state:

- 9 a. the date said facilities began operation;
b. the date said facility ceased operation; and
10 c. the name of each type of ASBESTOS-CONTAINING
PRODUCT manufactured, processed or assembled at each such
11 facility.

12 RESPONSE TO INTERROGATORY NO. 16:

13 (The dates in parentheses represent date facility began
14 operation and date it ceased operation.)

15 Asbestos-cement pipe:

16 Ambler, PA (1938 - 1982)
17 St. Louis, MO (1938 - 1979)
18 Hillsboro, TX (1961 - 1987)
19 Santa Clara, CA (1953 - 1982)
20 Riverside, CA (1965 - present)

21 Specialty Insulation Products for Railroad Industry:

22 Kansas City, KS (1943 - present)

23 CertainTeed roofing plants:

24 Avery, OH (1972 - present)
25 Chicago Heights, IL (1931 - 1984)
26 Dallas, TX (1946 - 1984)
27 East St. Louis, IL (1901 - 1969)
28 Kansas City, MO (1901 - 1981)

1 Marseilles, IL (unknown - 1955)
2 Minneapolis, MN (1934 - 1973)
3 Niagara Falls, NY (unknown - 1957)
4 Oxford, NC (1979 - present)
5 Richmond, CA (1915 - 1984)
6 Savannah, GA (1930 - 1987)
7 Shakopee, MN (1974 - present)
8 Tacoma, WA (1955 - 1984)
9 York, PA (1916 - 1981)

10 INTERROGATORY NO. 17:

11 Has THIS DEFENDANT purchased or otherwise acquired any
12 rights to the manufacture of ASBESTOS-CONTAINING PRODUCT(S) from
another COMPANY? If so, state:
13 a. the date of purchase of acquisition of such rights;
14 b. the trade, brand, and/or generic name of such
ASBESTOS-CONTAINING PRODUCT(S);
15 c. the name and location of any COMPANY from which
such rights were purchased or acquired;
16 d. the IDENTITY of the custodian of records of such
purchase(s) or acquisition(s).

17 RESPONSE TO INTERROGATORY NO. 17:

18 a. - c. Subject to the aforementioned general
19 objections, on June 1, 1962, defendant purchased from Keasbey &
20 Mattison Company (pursuant to an Agreement between Keasbey &
21 Mattison Company and Certain-teed Products Corporation, dated
22 April 1, 1962) its four asbestos-cement pipe plants and all of
23 its machinery, fixtures, tools and supplies which related to and
24 had been used by Keasbey & Mattison exclusively in the making of
25 asbestos-cement pipe. Defendant's purchase of Keasbey &
26 Mattison's assets was limited to the four aforementioned
27 asbestos-cement pipe plants and related machinery, etc.

28

1 Defendant did not purchase any Keasbey & Mattison assets
2 which had been used to manufacture insulation, textile or roofing
3 materials. At the time of the purchase of the Keasbey & Mattison
4 asbestos-cement pipe assets, there was no general assumption of
5 liability by defendant nor did defendant specifically assume
6 liability for claims growing out of the sale of any Keasbey &
7 Mattison products manufactured prior to the date of purchase by
8 defendant of Keasbey & Mattison's asbestos-cement pipe assets.
9 The asbestos-cement pipe made by defendant was and is used solely
10 for the underground transmission of water and sewage, was not and
11 is not used in conjunction with insulation material, and is
12 typically installed by pipeline contractors.

13 On July 1, 1966, defendant, through merger, acquired the
14 Gustin-Bacon Manufacturing Company (pursuant to an Agreement and
15 Articles of Merger between Certain-teed Products Corporation and
16 Gustin-Bacon Manufacturing Company, dated April 19, 1966). At
17 the time Gustin-Bacon Manufacturing Company merged into
18 defendant, all the ordinary liabilities of the former entity were
19 assumed by defendant. The only asbestos-bearing products with
20 which Gustin-Bacon ever had any nexus were two specialty
21 insulation products sold exclusively to railroad companies. One
22 of these products, Flexible Trainline, which was made of fiber
23 glass which had an asbestos cloth facing, was used to insulate
24 steam lines on railway passenger cars, and the other, which had
25 no trade name, was a glass fiber blanket faced with asbestos
26 paper (referred to herein as "glass fiber blanket insulation
27 faced with asbestos paper") which was used to insulate the walls,
28 floors, and ceilings of railway passenger cars. Other than the

1 two aforesaid specialty insulation products, defendant has never
2 made or sold any asbestos-bearing insulation products
3 whatsoever.

4 d. Curtis M. Pontz, Assistant Secretary and Senior
5 Counsel, CertainTeed Corporation, 750 E. Swedesford Road, Valley
6 Forge, PA 19482.

7 INTERROGATORY NO. 18:

8 Has THIS DEFENDANT applied for and/or received any
9 patent(s) for any ASBESTOS-CONTAINING PRODUCT(S)? If so, state
10 for each such ASBESTOS-CONTAINING PRODUCT:

11 a. the product for which each patent was applied
12 and/or issued;

13 b. the date(s) of application;

14 c. the date(s) of issuance of the patent(s), if
15 granted;

16 d. the date(s) of renewal, if any;

17 e. the patent number(s);

18 f. the name of the individual or COMPANY to whom each
19 patent was issued;

20 g. the IDENTITY of the custodian of patent records of
21 THIS DEFENDANT.

22 RESPONSE TO INTERROGATORY NO. 18:

23 Subject to the aforementioned general objections,
24 defendant responds as follows:

25 a. asbestos-cement pipe

26 b. January 29, 1960

27 c. February 4, 1964

28 d. None

e. 3,120,465

f. Certain-teed Products Corporation

g. Gilda Saporta, Director of Patents and Trademarks,
CertainTeed Corporation, 750 E. Swedesford Road, Valley Forge,
PA 19482.

1 INTERROGATORY NO. 19:

2 Has THIS DEFENDANT registered any trademark(s) for any
3 ASBESTOS-CONTAINING PRODUCT(S); if so, state for each such
4 ASBESTOS-CONTAINING PRODUCT:

- 5 a. the product for which each trademark was
6 registered;
7 b. whether the registration was State or Federal;
8 (i) if State, name the State;
9 c. the date(s) of registration;
10 d. the term(s) thereof;
11 e. the date(s) of renewal;
12 f. the name of the individual or COMPANY to whom each
13 trademark was registered;
14 g. the IDENTITY of the custodian of such trademark
15 records of THIS DEFENDANT.

16 RESPONSE TO INTERROGATORY NO. 19:

17 Subject to the aforementioned general objections,
18 defendant responds as follows: No.

19 INTERROGATORY NO. 20:

20 Did THIS DEFENDANT contract with the General Services
21 Administration and/or other federal-government agency for the
22 sale, anywhere in the United States, of RAW ASBESTOS FIBER
23 between 1930 and 1980; if so, state for each such sale:

- 24 a. the grade(s) and type(s) of RAW ASBESTOS FIBER;
25 b. the quantity;
26 c. the date(s) of delivery;
27 d. the location(s), including the address(es) of
28 delivery.
e. the name(s) of the agency with which THIS DEFENDANT
contracted;
f. the date(s) of execution of such contract(s);
g. the IDENTITY of the custodian of such contract
records of THIS DEFENDANT.

29 RESPONSE TO INTERROGATORY NO. 20:

30 Subject to the aforementioned general objections,
31 defendant responds as follows: No.

32 INTERROGATORY NO. 21:

33 Did THIS DEFENDANT contract with the General Services
34 Administration and/or other federal-government agency for the
35 sale, anywhere in the United States, of ASBESTOS-CONTAINING
36 PRODUCT(S) between 1930 and 1980; please state for each such
37 sale:

- 38 a. the type of product;
39 b. the quantity;
40 c. the date(s) of delivery;

1 d. the location(s), including address(es) of delivery;
2 e. the name(s) of the agency with which THIS DEFENDANT
3 f. the date(s) of execution of such contract(s);
4 g. the IDENTITY of the custodian of such contract
5 records of THIS DEFENDANT.

6 RESPONSE TO INTERROGATORY NO. 21:

7 Subject to the aforementioned general objections,
8 defendant responds as follows: No.

9 INTERROGATORY NO. 22:

10 Does THIS DEFENDANT have any records of the MARKETING,
11 advertisement, or delivery of its RAW ASBESTOS FIBER and/or
12 ASBESTOS-CONTAINING PRODUCT(S) in or to NORTHERN CALIFORNIA? If
13 so, state:

14 a. the manner in which the records are kept, (e.g., in
15 boxes, files, on microfilm, microfiche or computer tape or disk);
16 b. the location(s) and address(es) where such records
17 are maintained;
18 c. the IDENTITY of the custodian of such records.

19 RESPONSE TO INTERROGATORY NO. 22:

20 Objection: In addition to the aforementioned general
21 objections, this interrogatory is oppressive, overly broad, and
22 burdensome, and all out of proportion to any possible discovery
23 value. Furthermore, this interrogatory is not applicable with
24 respect to raw fiber. Notwithstanding said objections and
25 without waiving same, with regard to CertainTeed asbestos-
26 containing products, defendant responds as follows:

27 a. It is not believed that any advertisements were
28 prepared for railroad products or roofing products or asbestos-
cement siding shingles. With respect to asbestos-cement pipe, it
was advertised, but defendant is unable to further respond
because it maintains no log or registry on the subject. With
respect to sales, defendant's roofing products were sold through
building material distributors and/or lumber yards. The

1 identities of any such entities would be contained in the
2 pertinent sales records.

3 Defendant has no sales records relating to roofing
4 products prior to 1973. Since 1978, defendant's roofing sales
5 records have been maintained on computer. If required, computer
6 printouts of the California sales, if any, of asbestos-bearing
7 roofing products will be made available at the law offices of
8 defendant's counsel for proper counsel's review and/or copying.
9 Invoices for all roofing sales for the years 1973-1975 are stored
10 in cartons by invoice number, by month, at defendant's facility
11 in Blue Bell, Pennsylvania. Invoices for all roofing sales for
12 the years 1976 and 1977 are on microfilm by invoice number, by
13 month, at defendant's facility in Blue Bell, Pennsylvania. Thus,
14 each invoice would have to be reviewed in order to determine
15 which invoices would be responsive to this request. Such a
16 review would be unduly burdensome and oppressive to conduct. If
17 required, defendant will make these documents available at its
18 facility in Blue Bell, Pennsylvania for review and copying by
19 proper counsel at a mutually convenient time with all costs
20 attendant to this inspection and copying to be assumed by the
21 party conducting such inspection.

22 Defendant has no sales records for asbestos-cement pipe
23 for the period 1962 to 1966. For the period 1967 to 1979,
24 defendant has invoices for sales for June, 1967, October through
25 December 1968, and 1969 through 1979, inclusive. The approximate
26 numbers of such invoices are as follows:

27	6/67, 10-12/68	2,500
	1969	14,950
28	1970	13,900
	1971	16,250
	1972	15,050

1	1973	16,364
	1974	23,000
2	1975	25,000
	1976	25,000
3	1977	28,000
	1978	30,800
4	1979	33,300

5
6 These invoices have been maintained on microfilm and are
7 filed only by invoice number, plant, and year. Thus defendant
8 would have to review each and every invoice in order to provide
9 the specific information sought by this request. Such a review
10 would be highly burdensome and oppressive. If required,
11 defendant will make available said invoices, which are maintained
12 at the headquarters of CertainTeed's Pipe Group in Valley Forge,
13 Pennsylvania, for review and copying by proper counsel at a
14 mutually convenient time, with all costs attendant to this
15 inspection and any copying to be assumed by the party conducting
16 such inspection.

17 For the period 1980 to present, defendant's sales
18 records for asbestos-cement pipe are contained in computer
19 printouts. At plaintiff's request, defendant's counsel will make
20 said printouts available to proper counsel for review and/or
21 copying at a mutually convenient time, with all costs attendant
22 to any such inspection and any copying to be assumed by the party
23 conducting such inspection.

24 With respect to asbestos-cement siding shingles, there
25 are no sales records for this product.

26 With respect to Flexible Trainline and glass fiber
27 blanket faced with asbestos paper, there are no sales records for
28 these products. They were sold directly to railroad companies.

b. The precise address of the location at which the records

1 reside is: (i) CertainTeed Pipe & Plastics Group,
2 CertainTeed Corporation, 750 E. Swedesford Road, Valley Forge,
3 PA 19482; and (ii) Levecque Technical Center, 1400 Union Meeting
4 Road, Blue Bell, Pennsylvania.

5 c. Custodian of Roofing Records is: Harry Owens,
6 Shelter Materials Group, CertainTeed Corporation, 750 E.
7 Swedesford Road, Valley Forge, PA 19482; and,

8 Custodian of Pipe Records is: Sue Thompson,
9 Pipe & Plastics Group, CertainTeed Corporation, 750 E. Swedesford
10 Road, Valley Forge, PA 19482.

11 INTERROGATORY NO. 23:

12 If THIS DEFENDANT has in its possession any records of
13 the MARKETing, advertisement, or delivery of its RAW ASBESTOS
14 FIBER and/or ASBESTOS-CONTAINING PRODUCTS (including microfilm,
15 microfiche, computer or tape disk, or any other system in which
16 data is taken from other records), state whether THIS DEFENDANT
17 has retained the original DOCUMENTS from which the data entered
18 into these modes of storage was obtained. If THIS DEFENDANT has
19 not retained such original DOCUMENTS, state:

20 a. the date(s) when and location(s) where the original
21 DOCUMENTS were disposed of;

22 b. the IDENTITY of the custodian of the original
23 DOCUMENTS at the time of their disposal;

24 RESPONSE TO INTERROGATORY NO. 23:

25 Objection: In addition to the aforementioned general
26 objections, this interrogatory is oppressive, overly broad, and
27 burdensome, and all out of proportion to any possible discovery
28 value. Furthermore, this interrogatory is not applicable with
29 respect to raw fiber. Notwithstanding said objections and
30 without waiving same, with regard to defendant's asbestos-
31 containing products, it is not believed that any advertisements
32 were prepared for railroad products or roofing products or
33 asbestos-cement siding shingles. With respect to asbestos-cement

1 pipe, it was advertised, but defendant is unable to further
2 respond because it maintains no log or registry on the subject.

3 With respect to sales, defendant's roofing products were
4 sold through building material distributors and/or lumber yards.
5 The identities of any such entities would be contained in the
6 pertinent sales records.

7 Defendant has no sales records relating to roofing
8 products prior to 1973. Since 1978, defendant's roofing sales
9 records have been maintained on computer. If required, computer
10 printouts of the California sales, if any, of asbestos-bearing
11 roofing products will be made available at the law offices of
12 defendant's counsel for proper counsel's review and/or copying.
13 Invoices for all roofing sales for the years 1973-1975 are stored
14 in cartons by invoice number, by month, at defendant's facility
15 in Blue Bell, Pennsylvania. Invoices for all roofing sales for
16 the years 1976 and 1977 are on microfilm by invoice number, by
17 month, at defendant's facility in Blue Bell, Pennsylvania. Thus,
18 each invoice would have to be reviewed in order to determine
19 which invoices would be responsive to this request. Such a
20 review would be unduly burdensome and oppressive to conduct. If
21 required, defendant will make these documents available at its
22 facility in Blue Bell, Pennsylvania for review and copying by
23 proper counsel at a mutually convenient time with all costs
24 attendant to this inspection and copying to be assumed by the
25 party conducting such inspection.

26 Defendant has no sales records for asbestos-cement pipe
27 for the period 1962 to 1966. For the period 1967 to 1979,
28 defendant has invoices for sales for June, 1967, October through

1 December 1968, and 1969 through 1979, inclusive. The approximate
2 numbers of such invoices are as follows:

3	6/67, 10-12/68	2,500
4	1969	14,950
	1970	13,900
5	1971	16,250
	1972	15,050
6	1973	16,364
	1974	23,000
7	1975	25,000
	1976	25,000
8	1977	28,000
	1978	30,800
9	1979	33,300

10
11 These invoices have been maintained on microfilm and are
12 filed only by invoice number, plant, and year. Thus defendant
13 would have to review each and every invoice in order to provide
14 the specific information sought by this request. Such a review
15 would be highly burdensome and oppressive. If required,
16 defendant will make available said invoices, which are maintained
17 at the headquarters of CertainTeed's Pipe Group in Valley Forge,
18 Pennsylvania, for review and copying by proper counsel at a
19 mutually convenient time, with all costs attendant to this
20 inspection and any copying to be assumed by the party conducting
21 such inspection.

22 For the period 1980 to present, defendant's sales
23 records for asbestos-cement pipe are contained in computer
24 printouts. At plaintiff's request, defendant's counsel will make
25 said printouts available to proper counsel for review and/or
26 copying at a mutually convenient time, with all costs attendant
27 to any such inspection and any copying to be assumed by the party
28 conducting such inspection.

 With respect to asbestos-cement siding shingles, there

1 are no sales records for this product.

2 With respect to Flexible Trainline and glass fiber
3 blanket faced with asbestos paper, there are no sales records for
4 these products. They were sold directly to railroad companies.

5 To the extent that CertainTeed has not retained original
6 documents of the sort which originally contained the information
7 requested in Interrogatory No. 22, defendant does not know when
8 or where the originals were disposed of or their custodian at the
9 time of disposal.

10 INTERROGATORY NO. 24:

11 Does THIS DEFENDANT have in its possession any
12 exemplar(s) of advertisements or brochures describing its RAW
13 ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCTS; if so, please
14 state:

- 13 a. the location of each exemplar;
- 14 b. the year(s) in which said exemplar(s) was utilized;
- 14 c. the IDENTITY of the custodian of such exemplars.

15 RESPONSE TO INTERROGATORY NO. 24:

16 Subject to the aforementioned general objections, the
17 promotional literature of which defendant has possession
18 pertaining to asbestos-cement pipe is listed on Exhibit "A"
19 attached hereto.

20 Defendant has no such documents pertaining to asbestos-
21 cement siding shingles or glass fiber blanket faced with asbestos
22 paper sold to the railroad industry.

23 Defendant has the following such documents pertaining to
24 roof coatings and cements: "CertainTeed Protective Products --
25 cements and coatings" (dated January, 1972); and "CertainTeed
26 Protective Products -- cements and coatings" (dated August,
27 1975).

28

1 The only such document in defendant's possession
2 regarding Flexible Trainline is a copy of a two-page brochure
3 which was published between 1966 and 1970.

4 With respect to advertisements, defendant objects in
5 addition to the aforementioned general objections in that this
6 interrogatory is not applicable with respect to raw fiber.
7 Notwithstanding said objections and without waiving same, with
8 regard to CertainTeed asbestos-containing products, it is not
9 believed that any advertisements were prepared for railroad
10 products or roofing products or asbestos-cement siding shingles.
11 With respect to asbestos-cement pipe, it was advertised, but
12 defendant is unable to further respond because it maintains no
13 log or registry on the subject.

14 The custodian of any materials in defendant's possession
15 is Curtis M. Pontz, Assistant Secretary and Senior Counsel,
16 CertainTeed Corporation, 750 E. Swedesford Road, Valley Forge,
17 PA 19482.

18 CertainTeed has no log or registry which would enable it
19 to determine the years in which any such materials were utilized.

20 INTERROGATORY NO. 25:

21 State the following:

- 22 a. the address(es) where the corporate records of THIS
23 DEFENDANT (including minutes from the Board of Directors meetings
and corporation annual reports), are currently located;
24 b. the IDENTITY of the custodian of such records.

24 RESPONSE TO INTERROGATORY NO. 25:

- 25 a. 750 E. Swedesford Road, Valley Forge, PA 19482
26 b. Thomas A. Decker, Vice President, General Counsel
27 and Secretary, CertainTeed Corporation.

28 INTERROGATORY NO. 26:

Describe the packaging or containers in which THIS

1 DEFENDANT sold and/or distributed RAW ASBESTOS FIBER, including
2 composition, dimension, shape and color.

3 RESPONSE TO INTERROGATORY NO. 26:

4 Subject to the aforementioned general objections,
5 defendant did not sell and/or distribute raw asbestos fiber.

6 INTERROGATORY NO. 27:

7 Describe any logo, design, marking or printing,
8 including size and color, which appeared on the packaging or
9 containers in which THIS DEFENDANT sold and/or distributed RAW
10 ASBESTOS FIBER.

11 RESPONSE TO INTERROGATORY NO. 27:

12 Subject to the aforementioned general objections,
13 defendant did not sell and/or distribute raw asbestos fiber.

14 INTERROGATORY NO. 28:

15 Describe the packaging or containers in which THIS
16 DEFENDANT sold and/or distributed ASBESTOS-CONTAINING PRODUCT(S),
17 including composition, dimension, shape and color.

18 RESPONSE TO INTERROGATORY NO. 28:

19 1. Asbestos Roof Coating - First placed on the market
20 prior to 1930. Withdrawn from the market in 1982 due to economic
21 considerations (poor profit margins). It was composed of
22 asphalt, mineral spirits and approximately 6.7% 7M chrysotile
23 asbestos fiber. It was designed for use as a coating for smooth
24 surface asphalt roofs, and was sold in one-gallon friction top
25 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
26 drums. The CertainTeed name appeared on the container. It was a
27 viscous black liquid that could be spread with a brush or
28 sprayed, and any atmospheric temperature was recommended.

2. Blind Nailing Cement - First placed on the market
prior to 1930. Withdrawn from the market in 1979 due to economic
considerations (poor profit margins). It was composed of asphalt

1 mineral spirits and approximately 13% 7M chrysotile asbestos
2 fiber. It was designed for use in sealing the laps of roll
3 roofing applied with no exposed nails, and was sold in one-gallon
4 friction top steel cans, five-gallon steel pails, and 30- and
5 55-gallon steel drums. The CertainTeed name appeared on the
6 container. It was a viscous black liquid that could be applied
7 with a stiff brush or trowel, and any atmospheric temperature was
8 recommended.

9 3. Plastic Cement - First placed on the market prior
10 to 1930. Withdrawn from the market in 1983 due to economic
11 consideration (poor profit margins). It was composed of asphalt,
12 mineral spirits, pulverized limestone and approximately 18% 7K
13 chrysotile asbestos fiber and 18% 7M chrysotile asbestos fiber.
14 It was designed for flashing, caulking, heavy duty roof repairs,
15 and patching roof flashings, and was sold in one-pint, one-quart,
16 1/2-gallon, and one-gallon friction top steel cans, three- and
17 five-gallon steel pails, and 30- and 55-gallon steel drums. The
18 CertainTeed name appeared on the container. It was a black
19 mastic that could be applied with a trowel, and any atmospheric
20 temperature was recommended.

21 4. Sealing Cement - First placed on the market prior
22 to 1930. Withdrawn from the market in 1976 due to economic
23 considerations (poor profit margins). It was composed of
24 asphalt, mineral spirits, and approximately 29% 7M chrysotile
25 asbestos fiber. It was designed for sealing down asphalt
26 shingles and was sold in one-gallon friction top steel cans,
27 five-gallon steel pails, and 30- and 55-gallon steel drums. The
28 CertainTeed name appeared on the container. It was a black

1 mastic that could be applied with a trowel, and any atmospheric
2 temperature was recommended.

3 5. Cold Process Cement - First placed on the market in
4 approximately 1940. Withdrawn from the market in 1967 (replaced
5 by Cold Process Asphalt). It was composed of asphalt, mineral
6 spirits, and approximately 6.7% 7M chrysotile asbestos fiber. It
7 was designed for use in applying rolls of smooth roofing to
8 obtain a built-up roof and was sold in one-gallon friction top
9 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
10 drums. The CertainTeed name appeared on the container. It was a
11 viscous black liquid that could be spread with a brush or
12 sprayed, and any atmospheric temperature was recommended.

13 6. Cold Process Asphalt - First placed on the market
14 in 1967. Withdrawn from the market in 1983 due to economic
15 considerations (poor profit margins). It was composed of
16 asphalt, mineral spirits, and approximately 6.7% 7M chrysotile
17 asbestos fiber. Cold process asphalt was the name given to "cold
18 process cement" subsequent to 1967. It was sold in one-gallon
19 friction top steel cans, five-gallon steel pails, and 30- and
20 55-gallon steel drums. The CertainTeed name appeared on the
21 container. It was a viscous black liquid that could be spread
22 with a brush or sprayed, and any atmospheric temperature was
23 recommended.

24 7. Stabilized Roof Coating - First placed on the
25 market in approximately 1940. Withdrawn from the market in 1967
26 due to economic considerations (poor profit margins). It was
27 composed of asphalt, mineral spirits, and approximately 6.7% 7M
28 chrysotile asbestos fiber. It was designed for coating cold

1 process smooth surface built-up asphalt roofs and was sold in
2 one-gallon friction top steel cans, five-gallon steel pails, and
3 30- and 55-gallon steel drums. The CertainTeed name appeared on
4 the container. It was a viscous black liquid that could be
5 spread with a brush or sprayed, and any atmospheric temperature
6 was recommended.

7 8. Wet Seal Plastic Cement - First placed on the
8 market in 1961. Withdrawn from the market in 1983 due to
9 economic considerations (poor profit margins). It was composed
10 of asphalt, mineral spirits, an amine wetting agent, pulverized
11 limestone and approximately 18% 7K chrysotile asbestos and 18% 7M
12 chrysotile asbestos. It was designed for use in providing
13 adhesion to wet or damp surfaces in making heavy duty repairs to
14 wet roofs and was sold in one-gallon friction top steel cans,
15 five-gallon steel pails, and 30- and 55-gallon steel drums. The
16 CertainTeed name appeared on the container. It was a black mastic
17 that could be applied with a trowel, and any atmospheric
18 temperature was recommended.

19 9. Asphalt Fibered Emulsion - First placed on the
20 market some time during the 1950's. Withdrawn from the market in
21 1983 due to economic considerations (poor profit margins). It
22 was composed of asphalt, water, clay, electrolyte and an unknown
23 quantity of asbestos fiber. It was designed for coating smooth
24 surface asphalt roofs and was sold in one-gallon friction top
25 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
26 drums. The CertainTeed name appeared on the container. It was a
27 viscous black liquid that could be spread with a brush or
28 sprayed, and any atmospheric temperature was recommended.

1 10. Fibered Aluminum Roof Coating - First placed on the
2 market in 1951. Withdrawn from the market in 1979 due to
3 economic considerations (poor profit margins). It was composed
4 of asphalt, mineral spirits, aluminum powder, and an unknown
5 quantity of asbestos fiber. It was designed for coating smooth
6 surface asphalt roofs and was sold in one-gallon friction top
7 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
8 drums. The CertainTeed name appeared on the container. It was a
9 viscous aluminum colored liquid that could be spread with a brush
10 or roller, and any atmospheric temperature was recommended.

11 11. Asphalt Foundation Coating - First placed on the
12 market in approximately 1940. Withdrawn from the market in 1981
13 due to economic considerations (poor profit margins). It was
14 composed of asphalt, mineral spirits, and approximately 6.7% 7M
15 chrysotile asbestos fiber. It was designed for coating the
16 exterior of foundations before backfilling, and was sold in one-
17 gallon friction top steel cans, five-gallon steel pails, and
18 30- and 55-gallon steel drums. The CertainTeed name appeared on
19 the container. It was a viscous black liquid that could be
20 spread with a brush or sprayed, and any atmospheric temperature
21 was recommended.

22 12. No. 15 Perforated Saturated Asbestos Felt First
23 placed on the market in 1968. Withdrawn from the market in 1976
24 due to lack of demand for the product. It was composed of
25 asphalt, organic fiber, and 58% asbestos fiber (type and grade
26 unknown). It was designed for use as plies for built-up roofs and
27 flashing, and packaged with a kraft paper wrapper, was not color
28 coded, and contained no logo or markings except for laying lines

1 of aluminum paint. The CertainTeed name appeared on the wrap.
2 It was a black roll good which was applied with hot asphalt, and
3 any atmospheric temperature was recommended.

4 13. Asbestos Base Sheet - First placed on the market in
5 1968. Withdrawn from the market in 1976 due to lack of demand
6 for the product. It was composed of asphalt, organic fiber,
7 glass fiber, pulverized limestone, pulverized talc, and 20%
8 asbestos fiber (type and grade unknown). It was designed for use
9 as the first ply in applying a built-up roof, and packaged with a
10 kraft paper wrapper, was not color coded, and contained no logo
11 or other marking except for laying lines of orange-red paint.
12 The CertainTeed name appeared on the wrap. It was a black roll
13 good which was nailed or applied with hot asphalt, and any
14 atmospheric temperature was recommended.

15 14. Asbestos Base Flashing - First placed on the market
16 in 1968. Withdrawn from the market in 1976 due to lack of demand
17 for the product. It was composed of asphalt, organic fiber,
18 pulverized limestone, pulverized talc, 19% asbestos fiber (type
19 and grade unknown), and either glass, hemp, or jute fiber. It
20 was designed for use as one ply in installing flashing and
21 packaged with a kraft paper wrapper, was not color coded, and
22 contained no logo or other markings. The CertainTeed name
23 appeared on the wrap. It was a black roll good which was applied
24 with hot asphalt, and any atmospheric temperature was
25 recommended.

26 15. Asbestos Cap Sheet (mineral surfaced) - First
27 placed on the market in 1973. Withdrawn from the market in 1976
28 due to lack of demand for the product. It was composed of

1 asphalt, organic fiber, pulverized limestone, pulverized talc,
2 coarse crushed rock, and 13.8% asbestos fiber (type and grade
3 unknown). It was designed for use as the top ply on build-up
4 roofs and packaged with a kraft wrapper, was not color coded, and
5 contained no logo or other markings except for a laying line of
6 orange-red paint. The CertainTeed name appeared on the wrap. It
7 was a black roll good which was applied with hot asphalt and any
8 atmospheric temperature was recommended.

9 16. Asbestos-Cement Siding Shingles - First placed on
10 the market in approximately 1950. Withdrawn from the market in
11 the mid-1960's due to economic considerations (poor profit
12 margins). Asbestos-cement siding shingles were flat slabs which
13 came in various colors (type, grade, and amount of asbestos fiber
14 unknown). They were designed for use on the exterior of homes
15 and were nailed to the exterior surface. They were supplied in
16 packages having a corrugated fiberboard band and sides held in
17 place by two wire ties. The CertainTeed name appeared on the
18 band, and any atmospheric temperature was recommended.

19 17. Asbestos-Cement Pipe (may have carried the brand
20 name Fluid-Tite) - First placed on the market June 1, 1962.
21 CertainTeed currently manufactures and sells asbestos-cement
22 pipe. The asbestos fiber is bound into the asbestos-cement pipe
23 by a combination of cement, silica, and water through an
24 autoclave (high pressure steam atmosphere) curing process. It
25 contains the following amounts of asbestos by weight:

26	Pressure Pipe	15 to 20%
27	Sewer Pipe	10 to 15%
28	Irrigation Pipe	11 to 20%

1 Of the total asbestos content of the asbestos-cement pipe,
2 anywhere from 0% to 24% has been crocidolite (blue) fiber by
3 weight, with the remaining fiber being chrysotile (white)
4 depending on the type of pipe. Asbestos-cement pipe is used for
5 the underground transmission of water and sewage. No packaging
6 has been used in connection with the product. The sewer pipe
7 contains black lettering, including the name "CertainTeed," the
8 pressure pipe contains either black or orange lettering,
9 including the name "CertainTeed," and the irrigation pipe has
10 black lettering including the name "CertainTeed." It was
11 installed in the form in which it is sold except to the extent
12 that it may require machining in order to meet a specific length.
13 The temperature limit is 200°F.

14 18. Glass Fiber Blanket Insulation Faced with Asbestos
15 Paper for Railroad Car Application - First placed on the market
16 by Gustin-Bacon Manufacturing Company in 1945. Withdrawn from
17 the market in 1947 because of poor moisture vapor transmission
18 and as a result of the determination that there was no need for
19 an incombustible facing. It was composed of nine-micron glass
20 fiber blanket and reinforced asbestos paper facing. It was
21 intended solely for use in insulating ceilings, walls, and floors
22 of railroad passenger cars, and was packaged in cardboard or
23 wrapped in heavy kraft paper. It was applied on railway cars and
24 placed against the ceiling, walls, and floors. No writing is
25 believed to have been on the product. The content of any writing
26 on the packaging is unknown and the recommended temperature range
27 in unknown.

1 19. Flexible Trainline - First placed on the market by
2 Gustin-Bacon Manufacturing Company in 1945. First manufactured
3 and sold by CertainTeed in 1966. Withdrawn from the market in
4 1970 due to lack of demand for the product. It was composed on
5 nine-micron glass fiber blanket, resin bonded, and adhered with
6 adhesive to neoprene-coated asbestos cloth. It was intended
7 solely for use in insulating railroad passenger car steam lines.
8 It was packaged in cardboard or wrapped in heavy kraft paper, and
9 was installed by lacing the insulation onto the passenger car
10 steam lines with copper wire affixed to hooks which were fastened
11 to the insulation jacketing. No writing is believed to have been
12 on the product. The content of any writing on the packaging is
13 unknown and the recommended temperature limit was 300°F.

14 INTERROGATORY NO. 29:

15 Describe any logo, design, marking or printing,
16 including size and color, which appeared on the packaging or
17 containers in which THIS DEFENDANT sold and/or distributed
ASBESTOS-CONTAINING PRODUCTS.

18 RESPONSE TO INTERROGATORY NO. 29:

19 1. Asbestos Roof Coating - First placed on the market
20 prior to 1930. Withdrawn from the market in 1982 due to economic
21 considerations (poor profit margins). It was composed of
22 asphalt, mineral spirits and approximately 6.7% 7M chrysotile
23 asbestos fiber. It was designed for use as a coating for smooth
24 surface asphalt roofs, and was sold in one-gallon friction top
25 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
26 drums. The CertainTeed name appeared on the container. It was a
27 viscous black liquid that could be spread with a brush or
28 sprayed, and any atmospheric temperature was recommended.

1 2. Blind Nailing Cement - First placed on the market
2 prior to 1930. Withdrawn from the market in 1979 due to economic
3 considerations (poor profit margins). It was composed of asphalt
4 mineral spirits and approximately 13% 7M chrysotile asbestos
5 fiber. It was designed for use in sealing the laps of roll
6 roofing applied with no exposed nails, and was sold in one-gallon
7 friction top steel cans, five-gallon steel pails, and 30- and
8 55-gallon steel drums. The CertainTeed name appeared on the
9 container. It was a viscous black liquid that could be applied
10 with a stiff brush or trowel, and any atmospheric temperature was
11 recommended.

12 3. Plastic Cement - First placed on the market prior
13 to 1930. Withdrawn from the market in 1983 due to economic
14 consideration (poor profit margins). It was composed of asphalt,
15 mineral spirits, pulverized limestone and approximately 18% 7K
16 chrysotile asbestos fiber and 18% 7M chrysotile asbestos fiber.
17 It was designed for flashing, caulking, heavy duty roof repairs,
18 and patching roof flashings, and was sold in one-pint, one-quart,
19 1/2-gallon, and one-gallon friction top steel cans, three- and
20 five-gallon steel pails, and 30- and 55-gallon steel drums. The
21 CertainTeed name appeared on the container. It was a black
22 mastic that could be applied with a trowel, and any atmospheric
23 temperature was recommended.

24 4. Sealing Cement - First placed on the market prior
25 to 1930. Withdrawn from the market in 1976 due to economic
26 considerations (poor profit margins). It was composed of
27 asphalt, mineral spirits, and approximately 29% 7M chrysotile
28 asbestos fiber. It was designed for sealing down asphalt

1 shingles and was sold in one-gallon friction top steel cans,
2 five-gallon steel pails, and 30- and 55-gallon steel drums. The
3 CertainTeed name appeared on the container. It was a black
4 mastic that could be applied with a trowel, and any atmospheric
5 temperature was recommended.

6 5. Cold Process Cement - First placed on the market in
7 approximately 1940. Withdrawn from the market in 1967 (replaced
8 by Cold Process Asphalt). It was composed of asphalt, mineral
9 spirits, and approximately 6.7% 7M chrysotile asbestos fiber. It
10 was designed for use in applying rolls of smooth roofing to
11 obtain a built-up roof and was sold in one-gallon friction top
12 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
13 drums. The CertainTeed name appeared on the container. It was a
14 viscous black liquid that could be spread with a brush or
15 sprayed, and any atmospheric temperature was recommended.

16 6. Cold Process Asphalt - First placed on the market
17 in 1967. Withdrawn from the market in 1983 due to economic
18 considerations (poor profit margins). It was composed of
19 asphalt, mineral spirits, and approximately 6.7% 7M chrysotile
20 asbestos fiber. Cold process asphalt was the name given to "cold
21 process cement" subsequent to 1967. It was sold in one-gallon
22 friction top steel cans, five-gallon steel pails, and 30- and
23 55-gallon steel drums. The CertainTeed name appeared on the
24 container. It was a viscous black liquid that could be spread
25 with a brush or sprayed, and any atmospheric temperature was
26 recommended.

27 7. Stabilized Roof Coating - First placed on the
28 market in approximately 1940. Withdrawn from the market in 1967

1 due to economic considerations (poor profit margins). It was
2 composed of asphalt, mineral spirits, and approximately 6.7% 7M
3 chrysotile asbestos fiber. It was designed for coating cold
4 process smooth surface built-up asphalt roofs and was sold in
5 one-gallon friction top steel cans, five-gallon steel pails, and
6 30- and 55-gallon steel drums. The CertainTeed name appeared on
7 the container. It was a viscous black liquid that could be
8 spread with a brush or sprayed, and any atmospheric temperature
9 was recommended.

10 8. Wet Seal Plastic Cement - First placed on the
11 market in 1961. Withdrawn from the market in 1983 due to
12 economic considerations (poor profit margins). It was composed
13 of asphalt, mineral spirits, an amine wetting agent, pulverized
14 limestone and approximately 18% 7K chrysotile asbestos and 18% 7M
15 chrysotile asbestos. It was designed for use in providing
16 adhesion to wet or damp surfaces in making heavy duty repairs to
17 wet roofs and was sold in one-gallon friction top steel cans,
18 five-gallon steel pails, and 30- and 55-gallon steel drums. The
19 CertainTeed name appeared on the container. It was a black mastic
20 that could be applied with a trowel, and any atmospheric
21 temperature was recommended.

22 9. Asphalt Fibered Emulsion - First placed on the
23 market some time during the 1950's. Withdrawn from the market in
24 1983 due to economic considerations (poor profit margins). It
25 was composed of asphalt, water, clay, electrolyte and an unknown
26 quantity of asbestos fiber. It was designed for coating smooth
27 surface asphalt roofs and was sold in one-gallon friction top
28 steel cans, five-gallon steel pails, and 30- and 55-gallon steel

1 drums. The CertainTeed name appeared on the container. It was a
2 viscous black liquid that could be spread with a brush or
3 sprayed, and any atmospheric temperature was recommended.

4 10. Fibered Aluminum Roof Coating - First placed on the
5 market in 1951. Withdrawn from the market in 1979 due to
6 economic considerations (poor profit margins). It was composed
7 of asphalt, mineral spirits, aluminum powder, and an unknown
8 quantity of asbestos fiber. It was designed for coating smooth
9 surface asphalt roofs and was sold in one-gallon friction top
10 steel cans, five-gallon steel pails, and 30- and 55-gallon steel
11 drums. The CertainTeed name appeared on the container. It was a
12 viscous aluminum colored liquid that could be spread with a brush
13 or roller, and any atmospheric temperature was recommended.

14 11. Asphalt Foundation Coating - First placed on the
15 market in approximately 1940. Withdrawn from the market in 1981
16 due to economic considerations (poor profit margins). It was
17 composed of asphalt, mineral spirits, and approximately 6.7% 7M
18 chrysotile asbestos fiber. It was designed for coating the
19 exterior of foundations before backfilling, and was sold in one-
20 gallon friction top steel cans, five-gallon steel pails, and
21 30- and 55-gallon steel drums. The CertainTeed name appeared on
22 the container. It was a viscous black liquid that could be
23 spread with a brush or sprayed, and any atmospheric temperature
24 was recommended.

25 12. No. 15 Perforated Saturated Asbestos Felt First
26 placed on the market in 1968. Withdrawn from the market in 1976
27 due to lack of demand for the product. It was composed of
28 asphalt, organic fiber, and 58% asbestos fiber (type and grade

1 unknown). It was designed for use as plys for built-up roofs and
2 flashing, and packaged with a kraft paper wrapper, was not color
3 coded, and contained no logo or markings except for laying lines
4 of aluminum paint. The CertainTeed name appeared on the wrap.
5 It was a black roll good which was applied with hot asphalt, and
6 any atmospheric temperature was recommended.

7 13. Asbestos Base Sheet - First placed on the market in
8 1968. Withdrawn from the market in 1976 due to lack of demand
9 for the product. It was composed of asphalt, organic fiber,
10 glass fiber, pulverized limestone, pulverized talc, and 20%
11 asbestos fiber (type and grade unknown). It was designed for use
12 as the first ply in applying a built-up roof, and packaged with a
13 kraft paper wrapper, was not color coded, and contained no logo
14 or other marking except for laying lines of orange-red paint.
15 The CertainTeed name appeared on the wrap. It was a black roll
16 good which was nailed or applied with hot asphalt, and any
17 atmospheric temperature was recommended.

18 14. Asbestos Base Flashing - First placed on the market
19 in 1968. Withdrawn from the market in 1976 due to lack of demand
20 for the product. It was composed of asphalt, organic fiber,
21 pulverized limestone, pulverized talc, 19% asbestos fiber (type
22 and grade unknown), and either glass, hemp, or jute fiber. It
23 was designed for use as one ply in installing flashing and
24 packaged with a kraft paper wrapper, was not color coded, and
25 contained no logo or other markings. The CertainTeed name
26 appeared on the wrap. It was a black roll good which was applied
27 with hot asphalt, and any atmospheric temperature was
28 recommended.

1 15. Asbestos Cap Sheet (mineral surfaced) - First
2 placed on the market in 1973. Withdrawn from the market in 1976
3 due to lack of demand for the product. It was composed of
4 asphalt, organic fiber, pulverized limestone, pulverized talc,
5 coarse crushed rock, and 13.8% asbestos fiber (type and grade
6 unknown). It was designed for use as the top ply on build-up
7 roofs and packaged with a kraft wrapper, was not color coded, and
8 contained no logo or other markings except for a laying line of
9 orange-red paint. The CertainTeed name appeared on the wrap. It
10 was a black roll good which was applied with hot asphalt and any
11 atmospheric temperature was recommended.

12 16. Asbestos-Cement Siding Shingles - First placed on
13 the market in approximately 1950. Withdrawn from the market in
14 the mid-1960's due to economic considerations (poor profit
15 margins). Asbestos-cement siding shingles were flat slabs which
16 came in various colors (type, grade, and amount of asbestos fiber
17 unknown). They were designed for use on the exterior of homes
18 and were nailed to the exterior surface. They were supplied in
19 packages having a corrugated fiberboard band and sides held in
20 place by two wire ties. The CertainTeed name appeared on the
21 band, and any atmospheric temperature was recommended.

22 17. Asbestos-Cement Pipe (may have carried the brand
23 name Fluid-Tite) - First placed on the market June 1, 1962.
24 CertainTeed currently manufactures and sells asbestos-cement
25 pipe. The asbestos fiber is bound into the asbestos-cement pipe
26 by a combination of cement, silica, and water through an
27 autoclave (high pressure steam atmosphere) curing process. It
28 contains the following amounts of asbestos by weight:

1	Pressure Pipe	15 to 20%
2	Sewer Pipe	10 to 15%
3	Irrigation Pipe	11 to 20%

4 Of the total asbestos content of the asbestos-cement pipe,
5 anywhere from 0% to 24% has been crocidolite (blue) fiber by
6 weight, with the remaining fiber being chrysotile (white)
7 depending on the type of pipe. Asbestos-cement pipe is used for
8 the underground transmission of water and sewage. No packaging
9 has been used in connection with the product. The sewer pipe
10 contains black lettering, including the name "CertainTeed," the
11 pressure pipe contains either black or orange lettering,
12 including the name "CertainTeed," and the irrigation pipe has
13 black lettering including the name "CertainTeed." It was
14 installed in the form in which it is sold except to the extent
15 that it may require machining in order to meet a specific length.
16 The temperature limit is 200°F.

17 18. Glass Fiber Blanket Insulation Faced with Asbestos
18 Paper for Railroad Car Application - First placed on the market
19 by Gustin-Bacon Manufacturing Company in 1945. Withdrawn from
20 the market in 1947 because of poor moisture vapor transmission
21 and as a result of the determination that there was no need for
22 an incombustible facing. It was composed of nine-micron glass
23 fiber blanket and reinforced asbestos paper facing. It was
24 intended solely for use in insulating ceilings, walls, and floors
25 of railroad passenger cars, and was packaged in cardboard or
26 wrapped in heavy kraft paper. It was applied on railway cars and
27 placed against the ceiling, walls, and floors. No writing is
28 believed to have been on the product. The content of any writing

1 on the packaging is unknown and the recommended temperature range
2 in unknown.

3 19. Flexible Trainline - First placed on the market by
4 Gustin-Bacon Manufacturing Company in 1945. First manufactured
5 and sold by CertainTeed in 1966. Withdrawn from the market in
6 1970 due to lack of demand for the product. It was composed of
7 nine-micron glass fiber blanket, resin bonded, and adhered with
8 adhesive to neoprene-coated asbestos cloth. It was intended
9 solely for use in insulating railroad passenger car steam lines.
10 It was packaged in cardboard or wrapped in heavy kraft paper, and
11 was installed by lacing the insulation onto the passenger car
12 steam lines with copper wire affixed to hooks which were fastened
13 to the insulation jacketing. No writing is believed to have been
14 on the product. The content of any writing on the packaging is
15 unknown and the recommended temperature limit was 300°F.

16 At some unknown point in time, defendant commenced to
17 affix its logo (C and T with the stem of the T inserted sideways
18 into the C) to the containers in which its roof coatings and
19 cements were packaged. No other specific information pertaining
20 to product packaging or containers is presently available.

21 INTERROGATORY NO. 30:

22 Does THIS DEFENDANT have any exemplar(s) of packaging or
23 containers in which its RAW ASBESTOS FIBER and/or ASBESTOS-

24 CONTAINING PRODUCT(S) were sold and/or distributed; If so, state:
25 a. the location of each exemplar;
b. the year(s) in which said exemplar(s) was utilized;
c. the IDENTITY of the custodian of such exemplars.

26 RESPONSE TO INTERROGATORY NO. 30:

27 Subject to the aforementioned general objections,
28 defendant responds as follows: No.

1 INTERROGATORY NO. 31:

2 Did THIS DEFENDANT put warnings of asbestos-related
3 health hazards on bags of RAW ASBESTOS FIBER; if so, please
4 state:

- 5 a. the wording of such warning(s), including size,
6 location, and color;
7 b. whether the warning was put on a tag attached to
8 the bags;
9 c. the date such warning(s) was first used;
10 d. whether any change was made in the wording of such
11 warnings, the date(s) of such change, and the reasons for such
12 change.

13 RESPONSE TO INTERROGATORY NO. 31:

14 Subject to the aforementioned general objections,
15 defendant responds as follows: No.

16 INTERROGATORY NO. 32:

17 Did THIS DEFENDANT put warnings of asbestos-related
18 health hazards on the packaging or containers of ASBESTOS-
19 CONTAINING PRODUCT(S); If so, please state:

- 20 a. the wording of such warning(s), including size,
21 location on the packaging or containers, and color;
22 b. the date such warning(s) was first used;
23 c. whether any change was made in the wording of such
24 warning(s), the date(s) of such change, and the reason(s) for
25 such change.

26 RESPONSE TO INTERROGATORY NO. 32:

27 Subject to the aforementioned general objections, the
28 label placed on defendant's asbestos-cement pipe beginning in
1979 read as follows:

CAUTION:

Always use recommended work practices.
Do not use abrasive saws. When cutting,
machining and tapping, refer to
Recommended Work Practices Guide furnished
by manufacturer to your employer.

In approximately July, 1985, the caution label was
changed in order to provide additional explanation of the
potential hazard, to read as follows:

/ / /

1 CAUTION:

- 2 - Contains asbestos fiber
3 -Avoid creating dust. Breathing
4 asbestos dust can cause serious
5 bodily harm, including cancer and asbestosis.
6 -When cutting, machining and
7 tapping always use recommended
8 work practices (refer to
9 Recommended Work Practices Guide
10 furnished by manufacturer
11 to your employer).
12 Do not use Abrasive Disc Saws.

13 The warning is placed on the unmachined portion of pipe
14 (quarter lengths and larger) at or near the end of the pipe, and
15 is black in print over white background, approximately 2-7/8" x
16 3".

17 INTERROGATORY NO. 33:

18 Has THIS DEFENDANT distributed any brochures or
19 pamphlets that contain warnings of any asbestos-related health
20 hazards; if so, please state:

- 21 a. the wording of such warning;
22 b. the method used to distribute such brochures or
23 pamphlets;
24 c. the date(s) such brochures or pamphlets were first
25 issued;
26 d. whether THIS DEFENDANT has exemplar(s) of such
27 brochures or pamphlets;
28 e. the IDENTITY of the custodian of such exemplar(s).

RESPONSE TO INTERROGATORY NO. 33:

a. - c. Subject to the aforementioned general
objections, defendant responds as follows with respect to
asbestos-cement pipe:

Since 1977, defendant has distributed to purchasers of
its asbestos-cement pipe a booklet entitled "Recommended Work
Practices for A/C Pipe" published by the A/C Pipe Producers
Association. The entire booklet is intended to warn about
improper pipe machining techniques. The booklet was and is

1 incorporated into the CertainTeed Installation Guide for Fluid-
2 asbestos-Cement Pressure Pipe. Defendant's sales force has also
3 been provided with copies of this booklet for distribution to
4 engineers and contractors.

5 In addition, defendant has printed a warning in certain
6 of its brochures as follows:

7 1. CertainTeed Installation Guide Asbestos-
8 Cement Fluid-Tite Non-Pressure Sewer Pipe - (Code No. 40-31-06)

9 On page 21, it is stated, "CAUTION: - Asbestos-cement pipe
10 contains asbestos fibers. Do not cut or machine without
11 protection. Breathing asbestos dust may cause serious bodily
12 harm."

13 2. Installation Guide Fluid-Tite Pressure
14 Pipe (Code No. 40-21-07) - On inside front cover and on page 31,
15 it is stated, "CAUTION: - Asbestos-cement pipe contains asbestos
16 fibers. Do not cut or machine without protection. Breathing
17 asbestos dust may cause serious bodily harm."

18 3. A/C Pressure Installation Guide -
19 Distribution and Fluid Transmission Piping Systems (Code
20 40-23-07). On page 9, it is stated, "CAUTION - Asbestos-cement
21 pipe contains asbestos fibers. Do not cut or machine without
22 protection. Breathing asbestos dust may cause serious bodily
23 harm. Refer to 'Recommended Work Practices for A/C Pipe.'"
24 Pages 39-47 are a reproduction of the booklet entitled
25 "Recommended Work Practices for A/C Pipe" published by the A/C
26 Pipe Producers Association.

27 Dates of publication are supplied on Exhibit "A" appended to
28 these responses.

1 d. - e. Copies of these documents are in the custody
2 of Curtis M. Pontz, Esq., Senior Counsel and Assistant Secretary,
3 CertainTeed Corporation 750 E. Swedesford Road, Valley Forge,
4 Pennsylvania 19482.

5 INTERROGATORY NO. 34:

6 Did THIS DEFENDANT warn its employees and/or CONTRACT
7 UNIT(S), anywhere in the United States, that exposure to asbestos
8 could be hazardous to human health. If so, state:

- 9 a. whether copies of DOCUMENTS containing such
10 warnings exist;
11 b. the IDENTITY of the custodian of such DOCUMENTS.

12 RESPONSE TO INTERROGATORY NO. 34:

13 Objection: In addition to the aforementioned general
14 objections, defendant objects to this interrogatory on the
15 grounds that it is not applicable with respect to contract units
16 inasmuch as defendant never retained or maintained such units.
17 Notwithstanding said objections and without waiving same, with
18 respect to its employees, defendant has on occasion provided its
19 employees with brochures and booklets regarding the health
20 effects of asbestos. It is believed that such documents are
21 those which have been published on the subject by the Asbestos
22 Information Association. Copies of such documents are presumed
23 to be retained by the Asbestos Information Association.

24 INTERROGATORY NO. 35:

25 State the IDENTITY of medical directors and/or
26 industrial hygienists retained by THIS DEFENDANT in the United
27 States.

28 RESPONSE TO INTERROGATORY NO. 35:

 Subject to the aforementioned general objections, the
following individuals have been employed as industrial hygienists
for defendant:

1 1. Leon Horowitz was employed by defendant
2 at its offices in Valley Forge, Pennsylvania from 1962-1967. Mr.
3 Horowitz is no longer employed by defendant.

4 2. Walter Gubar was employed by defendant at
5 its offices in Kansas City, Kansas from 1966-1984. Mr. Gubar is
6 retired from defendant.

7 3. Owen H. Kittilstad was employed by
8 defendant at its facilities in Valley Forge, Pennsylvania from
9 1977-1988. Mr. Kittilstad is retired from defendant.

10 4. Thomas C. Shaffer was employed by
11 defendant at its facilities in Valley Forge, Pennsylvania from
12 1978-1981. Mr. Shaffer is no longer employed by defendant.

13 5. Janis L. Woodson has been employed by
14 defendant at its facilities in Valley Forge, Pennsylvania since
15 1978. Ms. Woodson's current title is Industrial Hygiene
16 Specialist.

17 6. Peter J. Norris was employed by defendant
18 at its facilities in Valley Forge, Pennsylvania from 1981-1986 as
19 a Corporate Industrial Hygienist. Mr. Norris is no longer
20 employed by defendant.

21 Defendant has employed a Medical Director since 1973.
22 Dr. J. L. Goodman served from March, 1973 until December, 1978.
23 Dr. L. J. Mellon has served in that capacity from December, 1978
24 to the present.

25 INTERROGATORY NO. 36:

26 Has any employee of THIS DEFENDANT testified by
27 deposition on behalf of THIS DEFENDANT in a third-party case,
28 brought in the United States, wherein the plaintiff has alleged
an asbestos-related injury? If so, for each such third party
case, please state:

- a. the caption and case number;
- b. the court of filing including state and county;

1 c. the date of the deposition;
2 d. the name and address of plaintiff's counsel of
record.

3
4 RESPONSE TO INTERROGATORY NO. 36:

5 a. - c. Subject to the aforementioned general
6 objections, defendant responds as follows: See the attached
Exhibit "B".

7 d. With respect to the name and address of plaintiff's
8 counsel, Exhibit "B" sets forth case name, court, and docket
9 number as well as deposition date. Propounding party can just as
10 easily as this defendant establish the identity of plaintiff's
11 counsel.

12 INTERROGATORY NO. 37:

13 Has THIS DEFENDANT been a member of the following:
14 a. Asbestos Textile Institute (ATI);
15 b. Industrial Hygiene Foundation and/or Industrial
Health Foundation (IHF);
16 c. Mineral Wool Institute;
17 d. Industrial Mineral Insulation Manufacturers
Institute;
18 e. Magnesia Silica Insulation Manufacturers
Association;
19 f. National Insulation Manufacturers Association
(NIMA);
20 g. Thermal Insulation Manufacturers Association
(TIMA);
21 h. Asbestos Information Association (AIA);
22 i. Quebec Asbestos Mining Association (QAMA);
23 j. National Safety Council;
24 k. Asbestos Cement Producers Association;
25 l. Refractories Institute;
26 m. any other organizations or associations of
27 manufacturers, miners, distributors, importers, labellers,
28 suppliers, and/or sellers of ASBESTOS-CONTAINING PRODUCTS;

(i) please state the name(s) of such organizations
or associations.

26 RESPONSE TO INTERROGATORY NO. 37:

27 Subject to the aforementioned general objections,
28 defendant has belonged to N.I.M.A. from 1967 through 1973,

1 T.I.M.A. from 1973 through the present, A.I.A./N.A. since its
2 founding in 1971, and the Association of Asbestos-Cement Pipe
3 Producers since its formation in 1973. Defendant joined the
4 Industrial Health Foundation in 1968 (defendant has no record of
5 when it ended affiliation).

6 INTERROGATORY NO. 38:

7 For each organization, association or other entity
8 identified in your Response to Interrogatory No. 37, please
state:

- 9 a. the dates during which THIS DEFENDANT was a member;
- 10 b. the name(s) of any publication(s) received by THIS
DEFENDANT from such association or organization.
- 11 c. the name of such committee or subcommittee of which
THIS DEFENDANT was a member, and the dates of such committee or
subcommittee membership.

12 RESPONSE TO INTERROGATORY NO. 38:

13 a. Subject to the aforementioned general objections,
14 defendant has belonged to N.I.M.A. from 1967 through 1973,
15 T.I.M.A. from 1973 through the present, A.I.A./N.A. since its
16 founding in 1971, and the Association of Asbestos-Cement Pipe
17 Producers since its formation in 1973. Defendant joined the
18 Industrial Health Foundation in 1968 (defendant has no record of
19 when it ended affiliation).

20 b. - c. Objection: In addition to the aforementioned
21 general objections, defendant objects to this interrogatory on
22 the ground that it cannot respond since it does not maintain a
23 log or registry which contains any such information.

24 INTERROGATORY NO. 39:

25 Has THIS DEFENDANT received any DOCUMENT(S) containing
26 results or conclusions of any studies and/or tests conducted by
the Saranac Laboratory at the Trudeau Foundation relating to the
27 human health consequences of exposure to asbestos? If so,
please:

- 28 a. IDENTIFY all such DOCUMENT(S);
- b. state the date upon which THIS DEFENDANT first
received such DOCUMENT(S);
- c. the IDENTITY of the custodian of such DOCUMENT(S).

1 RESPONSE TO INTERROGATORY NO. 39:

2 Subject to the aforementioned general objections,
3 defendant responds as follows: No.

4 INTERROGATORY NO. 40:

5 State whether THIS DEFENDANT has ever maintained a
6 library (or libraries) in the United States which contains books,
7 articles, periodicals, journals and/or reference materials that
8 relate to the subjects of asbestos, industrial hygiene, medicine,
9 safety, occupational disease and/or engineering. If so, state:
a. the date each such library was established;
b. the location of each such library;
c. the IDENTITY of each librarian or other person in
charge of such library.

10 RESPONSE TO INTERROGATORY NO. 40:

11 a. Subject to the aforementioned general objections,
12 defendant has maintained a corporate library at its facilities in
13 Blue Bell, Pennsylvania since 1977. Some materials received by
14 the library may pertain to or refer to asbestos.

15 b. The address of the Blue Bell facility is 1400 Union
16 Meeting Road, Blue Bell, Pennsylvania.

17 c. Karola RAC is in charge of the library.

18 INTERROGATORY NO. 41:

19 Has THIS DEFENDANT exchanged documents containing the
20 results of or communicated with any individual or other COMPANY
21 regarding tests and/or studies of the relationship between the
22 inhalation of asbestos fibers and development of disease(s); if
23 so, please state:

24 a. each individual or COMPANY with whom the
25 information was exchanged or to whom it was communicated;
26 b. the date(s) of any such exchanges or
27 communications;
28 c. the IDENTITY of the custodian of such documents.

25 RESPONSE TO INTERROGATORY NO. 41:

26 Subject to the aforementioned general objections,
27 defendant responds as follows: No.

28 / / /

1 INTERROGATORY NO. 42:

2 Has any employee of THIS DEFENDANT testified before the
3 Occupational Safety and Health Administration, the National
4 Institute of Occupational Safety and Health, or any committee or
5 subcommittee of the United States Congress on the inhalation of
6 asbestos dust and the development of disease; if so, please
7 state:

- 8 a. the entity before whom such testimony was given;
- 9 b. the date(s) and location(s) of such testimony;
- 10 c. the IDENTITY of the individual(s) who so testified;
- 11 d. whether any DOCUMENTS were presented to the entity
12 before which testimony was given;
- 13 e. whether copies of DOCUMENTS presented were retained
14 by THIS DEFENDANT;
- 15 (1) if so, state the IDENTITY of the custodian of
16 the DOCUMENT(S).

17 RESPONSE TO INTERROGATORY NO. 42:

18 Subject to the aforementioned general objections, to the
19 best of defendant's knowledge, the only individual who has so
20 testified is John P. McGinley, Vice President-Manufacturing of
21 defendant's Pipe & Plastics Group, who testified before OSHA in
22 1984 concerning the setting of asbestos exposure levels in
23 manufacturing facilities. Mr. McGinley recalls that he testified
24 in Washington D.C. in what he believes was the Spring of 1984,
25 but he does not recall either the exact location or date. He
26 does not have a copy of his testimony. No documents were
27 presented to OSHA.

28 INTERROGATORY NO. 43:

At any of the physical facilities identified in the
Response to Interrogatory No. 15, has THIS DEFENDANT conducted,
or caused to be conducted, tests and/or studies of ambient
asbestos dust created during the manufacture, processing and/or
assembling of ASBESTOS-CONTAINING PRODUCT(S); if so, please
state:

- a. each manufacturing facility, including location and
address; at which any such test and/or study was conducted;
- b. the date of each such test and/or study;
- c. the individual(s) or entity conducting each such
test and/or study;
- d. whether THIS DEFENDANT has any documents containing
the results and/or conclusions of each such study;
- e. the IDENTITY of the custodian of the documents.

1 RESPONSE TO INTERROGATORY NO. 43:

2 Objection: In addition to the aforementioned general
3 objections, defendant objects to this interrogatory on the basis
4 that such information is irrelevant inasmuch as there is no
5 evidence that any of the plaintiffs were ever employed by
6 defendant. Notwithstanding said objection and without waiving
7 same, dust samples were taken periodically at defendant's
8 asbestos-cement pipe plants subsequent to June 1, 1962 (when
9 defendant began manufacturing asbestos-cement pipe), by state or
10 federal agencies or by the loss control departments of
11 defendant's workers' compensation insurance carriers, and
12 subsequent to 1973 by defendant's employees. Defendant has no
13 log or registry which would enable it to supply the precise data
14 requested concerning any such sampling. Any such sampling
15 results in the custody of defendant are on file in CertainTeed
16 Corporation's Health and Safety Department in Valley Forge,
17 Pennsylvania. Defendant objects to reviewing such documents in
18 order to obtain the precise data requested because such sampling
19 results are incorporated in data which is greater than three feet
20 in depth, and thus, this interrogatory places an unreasonable
21 burden on defendant. Should there be any interest in reviewing
22 any of the pertinent documents, defendant will make all such
23 documents in its possession available at its executive offices in
24 Valley Forge, Pennsylvania for review and copying by proper
25 counsel. All costs attendant to this inspection, including all
26 copying costs, shall be borne by the party requesting said
27 inspection.

1 The person who is the custodian of the sampling results
2 on file in the Health and Safety Department is Janis Woodson,
3 CertainTeed Corporation, 750 E. Swedesford Road, Valley Forge, PA
4 19482.

5 INTERROGATORY NO. 44:

6 Has THIS DEFENDANT conducted, or caused to be conducted,
7 any tests and/or studies on ambient asbestos dust levels at any
8 location or job site where its ASBESTOS-CONTAINING PRODUCTS were
9 utilized in the United States; if so, please state:

10 a. the location, including name and address, at which
11 each such test and/or study was conducted;

12 b. the individual(s) or entity conducting each such
13 test and/or study;

14 c. the date of each such test and/or study;

15 d. whether THIS DEFENDANT has any DOCUMENTS containing
16 the results and/or conclusions of each such test and/or study;

17 e. the IDENTITY of the custodian of these DOCUMENTS.

18 RESPONSE TO INTERROGATORY NO. 44:

19 Subject to the aforementioned general objections,
20 defendant responds as follows: No.

21 INTERROGATORY NO. 45:

22 Did THIS DEFENDANT have any laboratory or other facility
23 anywhere in the United States at which it conducted, or caused to
24 be conducted, any tests and/or studies of its ASBESTOS-CONTAINING
25 PRODUCTS to measure the amount of asbestos dust generated by any
26 use for which such products were designed; if so, please state:

27 a. the location, including name and address, at which
28 each such test and/or study was conducted;

 b. the individual(s) or entity conducting each such
test and/or study

 c. the date of each such test and/or study;

 d. whether THIS DEFENDANT has any DOCUMENTS containing
the results and/or conclusions of each such test and/or study;

 e. the IDENTITY of the custodian of such DOCUMENTS.

INTERROGATORY NO. 46:

No Interrogatory No. 46 was propounded by plaintiff.

RESPONSE TO INTERROGATORY NO. 45:

Subject to the aforementioned general objections,
defendant responds as follows: No.

1 INTERROGATORY NO. 47:

2 Has THIS DEFENDANT notified in writing any individuals
3 or companies to whom it MARKETed RAW ASBESTOS FIBER and/or
4 ASBESTOS-CONTAINING PRODUCT(S), anywhere in the United States, of
5 the potential relationship between exposure to asbestos and
6 disease; if so, please state:

- 7 a. the date(s) THIS DEFENDANT provided this
8 information;
9 b. the means used for transmittal of such information;
10 c. whether THIS DEFENDANT has any copies of any
11 DOCUMENTS transmitting such information;
12 d. the IDENTITY of the custodian of such documents.

13 RESPONSE TO INTERROGATORY NO. 47:

14 a. - c. Subject to the aforementioned general
15 objections, defendant responds as follows with respect to
16 asbestos-cement pipe:

17 Since 1977, defendant has distributed to purchasers of
18 its asbestos-cement pipe a booklet entitled "Recommended Work
19 Practices for A/C Pipe" published by the A/C Pipe Producers
20 Association. The entire booklet is intended to warn about
21 improper pipe machining techniques. The booklet was and is
22 incorporated into the CertainTeed Installation Guide for Fluid-
23 Tite Asbestos-Cement Pressure Pipe. Defendant's sales force has
24 also been provided with copies of this booklet for distribution
25 to engineers and contractors.

26 In addition, defendant has printed a warning in certain
27 of its brochures as follows:

- 28 1. CertainTeed Installation Guide Asbestos-
29 Cement Fluid-Tite Non-Pressure Sewer Pipe (Code No. 40-31-06).
30 On page 21, it is stated, "CAUTION: - Asbestos-cement pipe
31 contains asbestos fibers. Do not cut or machine without
32 protection. Breathing asbestos dust may cause serious bodily
33 harm."

1 2. Installation Guide Fluid-Tite Pressure
2 Pipe (Code No. 40-21-07). On inside front cover and on page 31,
3 it is stated, "CAUTION: - Asbestos-cement pipe contains asbestos
4 fibers. Do not cut or machine without protection. Breathing
5 asbestos dust may cause serious bodily harm."

6 3. A/C Pressure Installation Guide -
7 Distribution and Fluid Transmission Piping Systems (Code
8 40-23-07). On page 9, it is stated, "CAUTION - Asbestos-cement
9 pipe contains asbestos fibers. Do not cut or machine without
10 protection. Breathing asbestos dust may cause serious bodily
11 harm. Refer to 'Recommended Work Practices for A/C Pipe.'"
12 Pages 39-47 are a reproduction of the booklet entitled
13 "Recommended Work Practices for A/C Pipe" published by the A/C
14 Pipe Producers Association.

15 d. Copies of these documents are in the custody of
16 Curtis M. Pontz, Esq., Senior Counsel and Assistant Secretary,
17 CertainTeed Corporation 750 E. Swedesford Road, Valley Forge,
18 Pennsylvania 19482.

19 INTERROGATORY NO. 48:

20 Has THIS DEFENDANT required any individual(s) who
21 MARKETed its ASBESTOS-CONTAINING PRODUCT(S) to wear respirators
or face masks; if so, please state:

- 22 a. the job title(s), if known, of individual(s)
required to wear respirators or face masks;
23 b. the date(s) on which THIS DEFENDANT first required
the wearing of respirators or face masks;
24 c. whether THIS DEFENDANT has any copies of DOCUMENTS
communicating such requirements;
25 d. the IDENTITY of the custodian of such DOCUMENTS.

26 RESPONSE TO INTERROGATORY NO. 48:

27 Subject to the aforementioned general objections,
28 defendant responds as follows: No.

1 INTERROGATORY NO. 49:

2 Does or did THIS DEFENDANT utilize or employ any
3 CONTRACT UNIT. If so, please state:
4 a. the inclusive periods of time the CONTRACT UNIT(S)
5 was utilized or employed;
6 b. the business address and name of the CONTRACT
7 UNIT(S);
8 c. whether THIS DEFENDANT has any DOCUMENTS showing
9 the location(s) of the job site(s) where the CONTRACT UNIT(S)
10 worked, and if so, state the IDENTITY of the custodian of such
11 DOCUMENTS.

12 RESPONSE TO INTERROGATORY NO. 49:

13 Subject to the aforementioned general objections,
14 defendant responds as follows: No.

15 INTERROGATORY NO. 50:

16 Has THIS DEFENDANT received any written communications
17 or other DOCUMENT, other than a claim for workers' compensation,
18 that any person was claiming injury as a result of exposure to
19 its RAW ASBESTOS FIBER and/or ASBESTOS-CONTAINING PRODUCT(S); if
20 so, please IDENTIFY the first such written communication or
21 DOCUMENT.

22 RESPONSE TO INTERROGATORY NO. 50:

23 Subject to the aforementioned general objections,
24 defendant responds in the affirmative. Defendant was first named
25 in a civil action alleging injury as a result of exposure to
26 asbestos containing products made or sold by defendant in late-
27 1975. However, defendant is unable to identify the first written
28 communication or document on the subject inasmuch as it has no
29 log or registry pertaining to such matters.

30 INTERROGATORY NO. 51:

31 Has any person filed a claim for asbestos-related injury
32 regarding THIS DEFENDANT against any workers' compensation
33 insurance carrier which provided coverage for THIS DEFENDANT; if
34 so, please state:

- 35 a. the date of such claim;
36 b. the name of claimant;
37 c. the caption;
38 d. the case number;
39 e. the court in which the claim was filed;

1 f. the IDENTITY of the custodian of such documents.

2 RESPONSE TO INTERROGATORY NO. 51:

3 a. Subject to the aforementioned general objections,
4 the first worker's compensation claim was served against
5 defendant in December, 1972.

6 b. - e. Objection: In addition to the aforementioned
7 general objections, the remainder of this interrogatory is
8 objected to on the basis that it is oppressive, overly broad, and
9 unduly burdensome, all out of proportion to any possible
10 discovery value and not reasonably calculated to lead to the
11 discovery of admissible evidence. Subject to all of the
12 aforementioned objections, defendant cannot further respond to
13 this interrogatory because it cannot break down the workers'
14 compensation claims brought against it over the years by type of
15 injury or type of claim asserted.

16 INTERROGATORY NO. 52:

17 Has any person filed a workers' compensation claim for
18 asbestos-related injury against THIS DEFENDANT; if so, please
19 state:

- 20 a. the date of such claim;
21 b. the name of claimant;
22 c. the caption;
23 d. the case number;
24 e. the court in which the claim was filed;
25 f. the IDENTITY of the custodian of such documents.

26 RESPONSE TO INTERROGATORY NO. 52:

27 a. Subject to the aforementioned general objections,
28 the first worker's compensation claim was served against
defendant in December, 1972.

b. - f. Objection: In addition to the aforementioned
general objections, the remainder of this interrogatory is

1 objected to on the basis that it is oppressive, overly broad, and
2 unduly burdensome, all out of proportion to any possible
3 discovery value and not reasonably calculated to lead to the
4 discovery of admissible evidence.

5 INTERROGATORY NO. 53:

6 Does THIS DEFENDANT have insurance available to cover
7 judgment(s) entered against it in asbestos-related personal
injury lawsuits; if so, please state:
8 a. the name and principal place of business of any
insurance carrier who has issued such policy of insurance;
9 b. the number and effective date of each policy;
c. the amount(s) of coverage of each policy;
10 d. the applicable dates of coverage;
e. any reservation of rights contained in each such
policy;
11 f. the amount of coverage presently exhausted under
each such policy;
12 g. the amount of coverage presently available under
each such policy;
13 h. whether limits contained in each such policy
include costs of defense.
14

15 RESPONSE TO INTERROGATORY NO. 53:

16 Subject to the aforementioned general objections,
17 defendant responds as follows: See the attached EXHIBIT "C".

18 a. CertainTeed is not obligated to research the
19 principal place of business of each insurance carrier listed on
20 Exhibit "C" to these responses to interrogatories as that
21 information is a matter of public record, and equally available
22 to plaintiffs. Additionally, CertainTeed is not obligated to to
23 perform legal research as to the "Principal Place of Business" of
24 any insurance carrier. This information would best be obtained
25 from the carrier(s) itself.

26 b. - e. See Exhibit "C", attached hereto.

27 f. Subject to the aforementioned general objections,
28 and notwithstanding defendant's previous response to this

1 interrogatory, defendant responds as follows: This information
2 is not currently available in any log or compilation.
3 Additionally, CertainTeed, as a member of the Center for Claims
4 Resolution, has entered into an agreement whereby this
5 interrogatory and its sub-parts are irrelevant, and not
6 calculated to lead to admissible evidence.

7 g. Subject to the aforementioned general objections,
8 and notwithstanding defendant's previous response to this
9 interrogatory, defendant responds as follows: This information
10 is not currently available in any log or compilation.
11 Additionally, CertainTeed, as a member of the Center for Claims
12 Resolution, has entered into an agreement whereby this
13 interrogatory and its sub-parts are irrelevant, and not
14 calculated to lead to admissible evidence.

15 h. Subject to the aforementioned general objections,
16 and notwithstanding defendant's previous response to this
17 interrogatory, defendant responds as follows: This information
18 is not currently available in any log or compilation.
19 Additionally, CertainTeed, as a member of the Center for Claims
20 Resolution, has entered into an agreement whereby this
21 interrogatory and its sub-parts are irrelevant, and not
22 calculated to lead to admissible evidence.

23 INTERROGATORY NO. 54:

24 Has THIS DEFENDANT owned or operated any petroleum
refining facilities; if so, please state:

- 25 a. whether any ASBESTOS-CONTAINING PRODUCT(S) were
MARKETed on the premises of such refining facilities;
26 b. the location, including the name and address of all
such refining facilities;
27 c. the dates of operation of such refining facilities;
d. the types of ASBESTOS-CONTAINING PRODUCT(S)
28 MARKETed on such premises;
e. the names of the manufacturers of any ASBESTOS-
CONTAINING PRODUCTS MARKETed on such premises;

- 1 f. whether THIS DEFENDANT has documents identifying
such MARKETing;
2 g. the IDENTITY of the custodian of such documents.

3 RESPONSE TO INTERROGATORY NO. 54:

4 Subject to the aforementioned general objections,
5 defendant responds as follows: No.

6 INTERROGATORY NO. 55:

7 Has THIS DEFENDANT held a controlling ownership interest
8 in any COMPANY which owned or operated petroleum refining
facilities; if so, for the period(s) of time during which THIS
9 DEFENDANT held such interest, please state:

- 10 a. whether any ASBESTOS-CONTAINING PRODUCTS were
MARKETed on the premises of such refining facilities;
11 b. the location, including the name and address of all
such refining facilities;
12 c. the dates of operation of such refining facilities;
d. the types of ASBESTOS-CONTAINING PRODUCTS MARKETed
on such premises;
13 e. the names of the manufacturers of any ASBESTOS-
CONTAINING PRODUCTS MARKETed on such premises;
14 f. whether THIS DEFENDANT has DOCUMENTS identifying
such MARKETing.
15 g. the IDENTITY of the custodian of such DOCUMENTS.

16 RESPONSE TO INTERROGATORY NO. 55:

17 Subject to the aforementioned general objections,
18 defendant responds as follows: No.

19 INTERROGATORY NO. 56/RESPONSE TO INTERROGATORY NO. 56:

20 No Interrogatory No. 56 was propounded.

21 INTERROGATORY NO. 57:

22 Has THIS DEFENDANT contracted with any COMPANY for the
23 MARKETing of ASBESTOS-CONTAINING PRODUCT(S) on any premises owned
or leased by THIS DEFENDANT; if so, please state:

- 24 a. the location, including name and address of such
premises;
25 b. the name and address of each such COMPANY;
26 c. the types of ASBESTOS-CONTAINING PRODUCTS;
d. the name of the manufacturers of such ASBESTOS-
CONTAINING PRODUCTS;
27 e. whether THIS DEFENDANT has DOCUMENTS of such
MARKETing;
28 f. the IDENTITY of the custodian of such DOCUMENTS.

1 RESPONSE TO INTERROGATORY NO. 57:

2 Subject to the aforementioned general objections,
3 defendant responds as follows: No.

4

5 DATED: August 6, 1990

SHIELD & SMITH
J. LAWRENCE JUDY
JAMES G. SCADDEN

6

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By: 

JAMES G. SCADDEN
Attorneys for Defendant
CERTAINTED CORPORATION

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Exhibit A

1. "Certain-teed Fluid-Tite Asbestos-Cement Pressure Pipe-CERTA-SPACER Band" Published 1964.
2. "Fluid-Tite Asbestos-Cement Pressure Pipe" Published 1966.
3. "Fluid-Tite Asbestos-Cement Pressure Pipe" Published 1970.
4. "Certain-teed Asbestos-Cement Non-Pressure Sewer Pipe" Published 1969.
5. "Certain-teed - We Have Specially Designed Our Coupling To Do A Sewer Job" Published 1967.
6. "The Modern Trend Underground/Certain-teed Fluid-Tite" Published 1967.
7. "Fluid-Tite Asbestos-Cement Small Diameter Sewer Pipe and Accessories Made By Certain-teed" Published 1970.
8. "Certain-teed High Head Asbestos-Cement Irrigation Pipe" Published 1967.
9. "Certain-teed Type 25,75 and 125 Asbestos-Cement Irrigation Pipe" Published 1969.
10. "Certain-teed High Head Asbestos-Cement Irrigation Pipe" Published 1970.
11. Threaded Brass Insert Couplings, Published 7/75.
12. FLUID-TITE Asbestos Cement Non-Pressure Sewer Pipe (Specification Sheet), Published 10/75.
13. Installation Guide Asbestos Cement FLUID-TITE Non-Pressure Sewer Pipe, Published 3/73
14. Asbestos-Cement Non-Pressure Sewer Pipe Designed for Modern, Economical, Long Life, Non-Pressure Sewer Systems, Published 8/74.
15. Installation Guide CT FLUID-TITE Pressure Pipe, Published 2/74.
16. Avoiding Surge in Asbestos Cement Pipe Lines, Published 6/75.
17. Epoxy-Lined Asbestos-Cement Pipe, Published (estimated date) 1975.
18. FLUID-TITE Asbestos-Cement Gravity Sewer Pipe (ASTM C644) Specifications, Published 8/77.
19. FLUID-TITE Asbestos Cement Small Diameter Sewer Pipe, Published 3/74.
20. Pipe Class Selection - FLUID-TITE Asbestos-Cement Non-Pressure Sewer Pipe, Published 4/74.

21. Engineering Drawings and Dimensions, Asbestos-Cement Non-Pressure Pipe, Couplings and Fittings, Published 7/73.
22. CertainTeed FLUID-TRANSMISSION ASBESTOS-CEMENT PIPE, Design and Specification Manual, Published 1971.
23. How to Make the Toughest Joint In Town Go Dry, Published 5/75.
24. The Right Way To: Receive - Unload - Handle - Store - Install CERTAIN-TEED ASBESTOS CEMENT PIPE AND PIPE ACCESSORIES, Published - (estimated) 1978.
25. Asbestos-Cement Pressure Pipe & FLUID-TITE COUPLING, Engineering Drawings And Dimensions And How To Connect To Other Pipe, Published 12/75.
26. FLOW CHART For CertainTeed FLUID-TITE, Asbestos-Cement Pressure Pipe, Published 7/75.
27. A/C Pressure Installation Guide - Distribution and Fluid Transmission Piping Systems (March 1982).
28. Installation Guide Asbestos Cement Fluid-Tite Non-Pressure Sewer Pipe (early 1980).
29. Installation Guide Fluid-Tite Pressure Pipe (early 1977).

DEPOSITION LISTING

<u>Deponent</u>	<u>Date of Deposition</u>	<u>Case Caption</u>	<u>Docket No.</u>	<u>Court</u>
DONALD, DELMAR J., M.D.	07/05/79	Barlieb, James H. v. Turner & Newall, et al.	78-1027	U.S.D.C. for the Eastern Dist of PA
		Cardamone, Emilio E. v. Turner & Newall, et al.	78-1117	U.S.D.C. for the Eastern Dist of PA
		McFadden, John v. Turner & Newall, et al.	78-1041	U.S.D.C. for the Eastern Dist of PA
		Giradi, Anthony v. Turner & Newall, et al.	78-1987	U.S.D.C. for the Eastern Dist of PA
HAMILTON, HARVEY	07/02/85	Washington, Donna Hayes v. Johns-Manville, et al.	791-509	Superior Court of CA, San Fran County
		Johnson, Hazel v. Johns- Manville, et al.	780-761	Superior Court of CA, San Fran County
		Ozene, Willie Emma v. Johns-Manville, et al.	782-572	Superior Court of CA, San Fran County
HAMILTON, HARVEY	01/15/87	Clapper Cases	603486-1	Superior Court of CA, Alameda County
			88602	Superior Court of CA, Solano County
			804416	Superior Court of CA, San Fran County
HARTMAN, ROBERT S.	04/02/79	Barlieb, James H. v. Turner & Newall, et al.	78-1027	U.S.D.C. for the Eastern Dist of PA
		Cardamone, Emilio E. v. Turner & Newall, et al.	78-1117	U.S.D.C. for the Eastern Dist of PA
		McFadden, John v. Turner & Newall, et al.	78-1041	U.S.D.C. for the Eastern Dist of PA
		Giradi, Anthony v. Turner & Newall, et al.	78-1987	U.S.D.C. for the Eastern Dist of PA
		Johnson, Clarence v. Turner & Newall, et al.	78-464	U.S.D.C. for the Eastern Dist of PA

<u>Deponent</u>	<u>Date of Deposition</u>	<u>Case Caption</u>	<u>Docket No.</u>	<u>Court</u>
		Amento, Victoria (Joseph) v. Turner & Newall, et al.	78-2023	U.S.D.C. for the Eastern Dist of PA
		Grabowski, Louis v. Turner & Newall, et al.	78-3046	U.S.D.C. for the Eastern Dist of PA
HARTMAN, ROBERT S.	11/08/84	Washington, Donna Hayes v. Johns-Manville; et al.	791-509	Superior Court of CA, San Fran County
		Johnson, Hazel v. Johns- Manville, et al.	780-761	Superior Court of CA, San Fran County
		Ozene, Willie Emma v. v. Johns-Manville, et al.	782-572	Superior Court of CA, San Fran County
HARTMAN, ROBERT S.	09/05/86	Good, Robert v. CertainTeed	85-1627HB	U.S.D.C. for the Dist of New Mexico
HARTMAN, ROBERT S.	01/13/87	Clapper Cases	603486-1	Superior Court of CA, Alameda County
			88602	Superior Court of CA, Solano County
			804416	Superior Court of CA, San Fran County
HARTMAN, ROBERT S.	11/17/80	Davis, Robert, et al. v. Turner & Newall, et al.	800722C(4)	U.S.D.C. for the Eastern Dist of PA
HOROWITZ, LEON DAVID	06/30/80	Johnson, Clarence v. Turner & Newall, et al.	78-464	U.S.D.C. for the Eastern Dist of PA
		Barlieb, James H. v. Turner & Newall, et al.	78-1027	U.S.D.C. for the Eastern Dist of PA
		Cardamone, Emilio E. v. Turner & Newall, et al.	78-1117	U.S.D.C. for the Eastern Dist of PA
		McFadden, John v. Turner & Newall, et al.	78-1041	U.S.D.C. for the Eastern Dist of PA
		Amento, Victoria (Joseph) v. Turner & Newall, et al.	78-2023	U.S.D.C. for the Eastern Dist of PA

<u>Deponent</u>	<u>Date of Deposition</u>	<u>Case Caption</u>	<u>Docket No.</u>	<u>Court</u>
		Grabowski, Louis v. Turner & Newall, et al.	78-3046	U.S.D.C. for the Eastern Dist of PA
		Giradi, Anthony v. Turner & Newall, et al.	78-1987	U.S.D.C. for the Eastern Dist of PA
HOROTIZ, LEON	02/01/82	Weisberg, Donald, Esq. & Bushman, Meyer A. (Timbers, 1978 Melvin P.) v. Bell Asbestos Mines, Ltd, et al.	May Term 4629	Court of Common Pleas for Phila- delphia County
		Hayden, Elsie (Jesse) v. Bell Asbestos Mines, Ltd, et al.	Nov. Term 1978 3624	Court of Common Pleas for Phila- delphia County
		Serratore, Peter v. Bell Asbestos Mines, Ltd, et al.	July Term 1979 3348	Court of Common Pleas for Phila- delphia County
		Coulston, Rosemary E. (Charles) v. Bell Asbestos Mines, Ltd., et al.	80-5250	Court of Common Pleas for Mont- gomery County
		Williams, Johnnie v. Bell Asbestos Mines, Ltd. et al.	Aug Term 1980 3710	Court of Common Pleas for Phila- delphia County
		Maco, Rose Mary (Paul, Sr.) v. Bell Asbestos Mines, Ltd., et al.	80-18537	Court of Common Pleas for Mont- gomery County
		Barnes, Edward v. Bell Asbestos Mines, Ltd., et al.	Dec Term 1980 4429	Court of Common Pleas for Phila- delphia County
		Bailey, Wardell M. v. Bell Asbestos Mines, Ltd., et al.	May Term 1981 1675	Court of Common Pleas for Phila- delphia County
		Dixon, William R. v. Bell Asbestos Mines, Ltd., et al.	Oct Term 1981 2874	Court of Common Pleas for Phila- delphia County
		Gaskins, Pauline (Alfred) v. Bell Asbestos Mines, Ltd., et al.	80-12774	Court of Common Pleas for Mont- gomery County

<u>Deponent</u>	<u>Date of Deposition</u>	<u>Case Caption</u>	<u>Docket No.</u>	<u>Court</u>
HOROWITZ, LEON	02/02/82	All Cases as Listed in Horowitz Deposition of 02/01/82 above.	See Above	See Above
KAAS, LESTER F.	04/03/80	All Cases as Listed in In Hartman Deposition of 04/02/79 Plus the Following: 79-1523, 79-4337, 79-4338, 79-4341, 79-4339, 79-4340, 79-4342, 79-2715, 78-4172, 79-3690, and 79-3770	See Above	U.S.D.C. for the Eastern Dist of PA
HOROWITZ, LEON D.	06/30/80	All Cases as Listed in Kaas Deposition of 04/03/80 above.	See Above	See Above
MAGERS, WILLIAM	06/13/79	Barlieb, James H. v. Turner & Newell, et al.	78-1027	U.S.D.C. for the Eastern Dist of PA
		Cardamone, Emilio E. v. Turner & Newell et al.	78-1117	U.S.D.C. for the Eastern Dist of PA
		McFadden, John v. Turner & Newell, et al.	78-1041	U.S.D.C. for the Eastern Dist of PA
		Giradi, Anthony v. Turner & Newell, et al.	78-1987	U.S.D.C. for the Eastern Dist of PA
		Johnson, Clarence v. Turner & Newell, et al.	78-464	U.S.D.C. for the Eastern Dist of PA
		Amento, Victoria (Joseph) v. Turner & Newell, et al.	78-2023	U.S.D.C. for the Eastern Dist of PA
		Grabowski, Louis v. Turner & Newell, et al.	78-3046	U.S.D.C. for the Eastern Dist of PA
MCGINLEY, JOHN P.	03/06/80	All Cases as Listed in Magers Deposition of 06/13/79	See Above	See Above
MCGINLEY, JOHN P.	03/20/80	All Cases as Listed in Magers Deposition of 06/13/79	See Above	See Above

<u>Deponent</u>	<u>Date of Deposition</u>	<u>Case Caption</u>	<u>Docket No.</u>	<u>Court</u>
McGINLEY, JOHN P.	05/05/86	Good, Robert v.	85-1627 H8	U.S.D.C for the Dist of New Mexico
McGinley, John P.	04/07/87	CertainTeed Clayton, Madeline (James T.) v. CertainTeed	I-056220-86	Superior Court of NJ Middlesex County
STRIEGEL, CHARLES H.	01/02/85	Washington, Donna Hayes v. Johns-Manville, et al.	791-509	Superior Court of CA, San Fran County
		Johnson, Hazel v. Johns- Manville, et al.	780-761	Superior Court of CA, San Fran County
		Ozone, Willie Emma v. Johns-Manville, et al.	782-572	Superior Court of CA, San Fran County
STRIEGEL, CHARLES H.	01/13/87	Clapper Cases	603286-1	Superior Court of CA, Alameda County
			88602	Superior Court of CA, Solano County
			804416	Superior Court of CA, San Fran County

<u>POLICY PERIOD</u>	<u>POLICY NO.</u>	<u>INSURED</u>	<u>POLICY TYPE</u>	<u>PER OCC/ACC LIMIT</u>	<u>BI OR COMBINED AGGREGATE</u>
7/01/81-7/01/82	04ALJ15946SCA	AEtna (TX & HI only)	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/81-7/01/82	04GLJ545SCA	AEtna (Except TX & HI)	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/82-7/01/83	04ALJ15970SCA	AEtna (TX & HI only)	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/82-7/01/83	04GLJ37667SCA	AEtna (Except TX & HI)	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/83-1/01/85	04ALJ15998SCA	AEtna (TX & HI only)	Product	\$ 1mBI 1mPD	\$ 3mBI 3mPD
7/01/83-1/01/85	04GL402016SCA	AEtna (Except TX & HI)	Product	\$ 1mBI 1mPD	\$ 3mBI 3mPD
1/01/85-1/01/86	GLA1940153	Nat'l Un.	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD

EXHIBIT "C"

<u>POLICY PERIOD</u>	<u>POLICY NO.</u>	<u>INSURER</u>	<u>POLICY TYPE</u>	<u>PER OCC/ACC LIMIT</u>	<u>BI OR COMBINED AGGREGATE</u>
7/01/81-7/01/82	04ALD15946SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
	(TX & HI only)				
7/01/81-7/01/82	04GL5545SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
	(Except TX & HI)				
7/01/82-7/01/83	04ALD15970SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
	(TX & HI only)				
7/01/82-7/01/83	04GL237667SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
	(Except TX & HI)				
7/01/83-1/01/85	04ALD15998SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 3mBI 3mPD
	(TX & HI only)				
7/01/83-1/01/85	04GL402016SCA	Aetna	Product	\$ 1mBI 1mPD	\$ 3mBI 3mPD
	(Except TX & HI)				
1/85-1/01/86	GLA1940153	Nat'l Un.	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD

<u>POLICY PERIOD</u>	<u>POLICY NO.</u>	<u>INSURER</u>	<u>POLICY TYPE</u>	<u>PER OCC/ACC LIMIT</u>	<u>BI OR COMBINED AGGREGATE</u>
7/01/73-7/01/74	TRLHSL9619047	Travelers	Product	\$100,000 BI (each person) \$ 300mBI 100mPD	\$ 300mBI 100mPD
7/01/74-7/01/75	TRLHSL121T922 974	Travelers	Product	\$ 300mBI 300mPD	\$ 1mBI 1mPD
7/01/75-7/01/76	TRLHSL121T922 974	Travelers	Product	\$ 300mBI 300mPD	\$ 1mBI 1mPD
7/01/76-7/01/77	04AL247680SCA	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/77-7/01/78	04AL247739SCA	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/78-7/01/79	04GL002SCA	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/79-7/01/80	04GL1455SCA	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/80-7/01/81	04AL315919SCA (TX & MI only)	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD
7/01/80-7/01/81	04GL35423SCA (Except TX & MI)	AEtna	Product	\$ 1mBI 1mPD	\$ 2mBI 2mPD

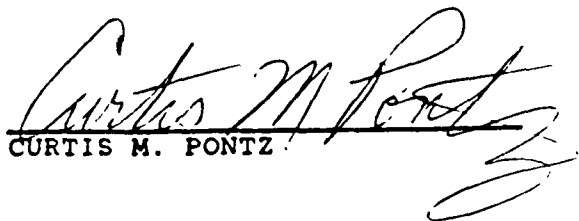
<u>POLICY PERIOD</u>	<u>POLICY NO.</u>	<u>INSURER</u>	<u>POLICY TYPE</u>	<u>PER OCC/ACC LIMIT</u>	<u>BI OR COMBINED AGGREGATE</u>
7/01/72-7/01/73	TRHSL9619047	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 100mPD
7/01/71-7/01/72	TRHSL9619047	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 100mPD
7/01/70-7/01/71	RHSL40247904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 100mPD
10/1/70-10/1/71	641-004781050	Liberty Mutual	Product	\$250mBI 500mPD	\$250mBI 500mPD
10/1/69-10/1/70	641-004781059	Liberty Mutual	Product	\$250mBI 500mPD	\$250mBI 500mPD
7/01/69-7/01/70	HSL-4020446	Travelers	Product	\$100mBI 250mPD	\$300mBI 500mPD
7/01/69-7/01/70	RHSL4027904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 100mPD
7/01/68-7/01/69	HSL-4020446	Travelers	Product	\$100mBI 250mPD	\$300mBI 500mPD
5/15/68-7/01/69	RHSL4027904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 100mPD
10/1/68-10/1/69	641-004781058	Liberty Mutual	Product	\$250mBI 500mPD	\$250mBI 500mPD

<u>POLICY PERIOD</u>	<u>POLICY NO.</u>	<u>INSURER</u>	<u>POLICY TYPE</u>	<u>PER OCC/ACC LIMIT</u>	<u>BI OR COMBINED AGGREGATE</u>
7/01/67-7/01/68	NSL-4020446	Travelers	Product	\$100mBI 250mPD	\$300mBI 300mPD
5/15/67-5/15/68	RHSL2677904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 300mBI 100mPD
10/1/67-10/1/68	641-004781037	Liberty Mutual	Product	\$250mBI 300mPD	\$250mBI 300mPD
10/1/66-10/1/67	641-004781036	Liberty Mutual	Product	\$250mBI 300mPD	\$250mBI 300mPD
5/15/66-5/15/67	RHSL2677904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 300mBI 100mPD
10/1/65-10/1/66	641-004781035	Liberty Mutual	Product	\$250mBI 300mPD	\$250mBI 300mPD
5/15/65-5/15/66	RHSL2677904	Travelers	Product	\$100mBI (each person) \$300mBI 100mPD	\$300mBI 300mBI 100mPD
1/01/63-5/15/63	052600037800	Employers of Wausau	Product	\$300mBI 100mPD	\$300mBI 100mPD
1/01/64-1/01/65	05260003780	Employers of Wausau	Product	\$100mBI (each person) \$300mBI 25mPD	\$300mBI 300mBI 30mPD
1/01/63-1/01/64	05240003780	Employers of Wausau	Product	\$100mBI (each person) \$300mBI	\$300mBI 300mBI

VERIFICATION

I am Assistant Secretary and Senior Counsel of CertainTeed Corporation, a defendant in this action, and have been authorized to make this Verification on their behalf. The attached document is true of my own knowledge, except the matters that are stated therein on information and belief, and as to those matters I believe it to be true.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.


CURTIS M. PONTZ

DATED: August 10, 1990

1 (PROOF OF SERVICE BY MAIL -- 1013a, 2015.5 C.C.P.)

2 STATE OF CALIFORNIA)
3 COUNTY OF SAN FRANCISCO) ss.

4
5 I am employed in the aforesaid county; I am over the age of
6 eighteen years and not a party to the within entitled action; my
7 business address is: 580 California Street, Suite 1400, San
Francisco, California 94104.

8 On August 14, 1990, 1990, I served the within:

9 CERTAINTED CORPORATION'S RESPONSES TO PLAINTIFF'S FIRST SET OF
10 INTERROGATORIES TO ALL DEFENDANTS IN RE: SOLANO COUNTY COMPLEX
ASBESTOS LITIGATION (pursuant to General Order No. 30)

11 on the interested parties in said action, by placing a true copy
12 thereof enclosed in a sealed envelope addressed as follows:

13
14 SEE ATTACHED MAILING LIST

15 I placed each such envelope, with postage thereon fully prepaid
16 for first-class mail, for collection and mailing at Shield &
17 Smith, San Francisco, California, following ordinary business
18 practices. I am readily familiar with the practice of Shield &
Smith for collection and processing of correspondence, said
19 practice being that in the ordinary course of business,
correspondence is deposited in the United States Postal Service
the same day as it is placed for collection.

20 Executed on August 14, 1990 at San Francisco, California.

21 X (State) I declare under penalty of perjury under the
22 laws of the State of California that the above is true and
correct.

23 _____ (Federal) I declare that I am employed in the office of
24 a member of the bar of this court at whose direction the service
was made.

25
26 
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In Re: Complex Asbestos
Solano County Proof of Service 9/89