



IN THE COURT OF COMMON PLEAS OF
CUYAHOGA COUNTY, OHIO

ANTHONY MARIO GRECO, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	CASE NOS. 323629-323678
	)	(HANNA, J.)
A-BEST PRODUCTS COMPANY, et al.,	)	
	)	
Defendants	)	

RESPONSES OF GENERAL REFRACTORIES COMPANY
TO PLAINTIFFS' MASTER SET OF
INTERROGATORIES PROPOUNDED TO
DEFENDANT, GENERAL REFRACTORIES COMPANY

COME NOW General Refractories Company, a defendant herein, by and through counsel of record, and pursuant to the Ohio Rules of Civil Procedure, and files the following responses to plaintiffs' interrogatories in this case.

greco/oh1:

GRC'S RESPONSES TO
PLAINTIFF'S MASTER SET OF INTERROGATORIES

GENERAL OBJECTIONS

These responses are based upon facts known or believed by GRC at the time of answering these Interrogatories. Much of the information, requested dates back many years and is difficult or impossible to reconstruct or retrieve. GRC, therefore, reserves the right to amend these responses as and if new or better information becomes available to it.

GRC objects to these Interrogatories insofar as they seek information which is subject to the attorney-client privilege, which evidences or constitutes attorney's work product, or which is or otherwise not discoverable under the provisions of the Rules of Civil Procedure.

GRC further objects to these Interrogatories insofar as they seek production of any information constituting a trade secret, confidential financial data or other confidential research, development or commercial information.

GRC further objects to these Interrogatories on the grounds that they are unnecessarily repetitive, and are therefore oppressive, burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

GRC further objects to these Interrogatories insofar as they purport to require GRC to "identify" documents, on the grounds that they are overly broad and burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and any objection stated in its responses to such Interrogatories, GRC will produce to Plaintiffs, at a mutually agreeable time in Bala Cynwyd, Pennsylvania, any and all documents responsive to such Interrogatories which are relevant, not subject to attorney-client privilege or to the work-product doctrine, and which do not contain trade secrets, confidential financial data or other confidential research, development or commercial information.

RESPONSES

1. Defendant, GRC objects to this interrogatory to the extent that it seeks information which is exempt from discovery pursuant to the attorney-client privilege, the attorney work product privilege, the party communications privilege and any other privileges or exemptions from discovery set forth in the Ohio Rules of Civil Procedure.

Defendant, GRC further objects to this interrogatory as being overly broad and burdensome. These interrogatories seek information regarding many different subjects spanning decades of time. To provide detailed information used to answer these exhaustive interrogatories would be extremely burdensome and in many instances is unlikely to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states that the following people have provided information utilized in answering these interrogatories:

Joseph Stein
Past President
106 Dixon Drive
Pittsburgh, PA 15209

Fred Schneider
Past Purchasing Manager
1177 Galaxy Circle
Pittsburgh, PA 15201

Joseph Smith
Past Director of Marketing Communications
3 Gien Drive
Pittsburgh, PA 15209

William Phelan (deceased)
Past Manager of Distributor Sales

K.I. Fenstamaker (deceased)
Past Director-Distributorship

Ward Troutman
Past Vice President
11628 N. 65th Street
Scottsdale, AZ 85254

Ray Bradley
Past Manager, Turnkey Division
2417 Lake Forest Ave.
Spring Hill, FL 33526

Robert L. Everett
Past Plant Manager
Sproul, PA

Roland H. King, Jr.
Past Sales Engineer

8225 Railroad Ave.
Pasadena, MD 21212

2. a. General Refractories Company
- b. Pennsylvania
- c. 225 City Line Ave.
Bala Cynwyd, PA 19004
- d. None

e. GRC objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, GRC objects to this Interrogatory on the basis that it seeks information relating to subsidiaries, related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. GRC will provide information relating only to GRC. Further, this interrogatory is objected to as it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto defendant states that it has been licensed within the State of Ohio since August, 1939. Further, defendant states that it does not own any property real or other within the state.

3. GRC objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, GRC objects to this Interrogatory on the basis that it seeks information relating to subsidiaries, related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. GRC will provide information relating only to GRC. Without waiving the above objections and subject thereto, defendant states that GRC was incorporated in 1922 in the Commonwealth of Pennsylvania.

4. GRC objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, GRC objects to this Interrogatory on the basis that it seeks information relating to subsidiaries,

related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. GRC will provide information relating only to GRC. Without waiving the above objections and subject thereto, defendant states that it was incorporated in the Commonwealth of Pennsylvania in 1922. In further response, the following companies were domestic subsidiaries of GRC that had some involvement with asbestos:

GRC purchased Ohio Lime Company in 1967. It was a wholly-owned subsidiary until 1979. At that time, GRC sold this subsidiary to Steetley Resources, Inc.

GRC purchased American Refractories Company, a Delaware Corporation in 1971 and operated it as a wholly-owned subsidiary until May, 1992.

GRC acquired the Mining and Mineral Division of Great Lakes Carbon Corporation in May, 1966. GRC incorporate this asset into Grefco, Inc., which operated as a wholly-owned subsidiary until May, 1992.

4.1. Refer to response to interrogatory no. 4.

5. This defendant did not manufacture asbestos-containing products. This defendant did assemble and/or resold products, which at one time or another, contained asbestos components.

(a) GRC, defendant

(b) (1) Litecast 30 & 30G
Steelklad Dibond 60 BIAE
Grefco Insulating Cement
Grefco Insul-Finish Cement
Fibrous Adhesive

(2) Not applicable

(3) Litecast 30 & 30G: 1961-1973
Steelklad Dibond 60 BIAE: 1967-1978
Grefco Insulating Cement: 1955-1971

Grefco Insul-Finish Cement: 1960-1971

Fibrous Adhesive: Assembled by GRC 1955-1973. From 1973 to 1981, this product was purchased in its final form from Johns-Manville, for resale only.

(4)(5) Litecast 30 & 30G: a hydraulic setting insulating castable, used either as a back-up insulation for refractory brick or in place of insulating brick or block insulation. Packaged in a powder form, for application was mixed with water and it dried to a grayish brown finish.

Fibrous Adhesive: a paste-like cement, used to hold refractory insulating block temporarily in position until permanent reinforcements or refractories can be installed. This product came premixed and dried to a light gray finish.

Steelklad Dibond 60 BIAE: a steel-jacketed chrome magnesite refractory brick, black in color, with an asbestos spacer board incorporated in it. Asbestos spacers were incorporated into the metal casing without change.

Grefco Insulating Cement: This product was an all-purpose insulating cement purchased from Eagle-Picher Industries, Inc. in its final form and sold as a resale item only. It was mixed with water and used primarily as a leveling material over insulating block or as a complete insulation on irregular surfaces. It dried to a grayish-white color.

Grefco Insul-Finish Cement: This product was an all-purpose hydraulic setting insulating cement, purchased from Eagle-Picher Industries, Inc. in its final form and sold as a resale item only. It was mixed with water and used to finish off other insulating material surfaces. It dried to a smooth white/off white finish.

(6) Litecast 30 & 30G: Valve-type 30lb. bags; 30 bags per standard pallet; shrink-wrapped. Bags were brown in color with "Litecast 30 or 30G" printed in either red or blue lettering. Lower portion of bag read "General Refractories Company" and weight of contents in black lettering.

Steelklad Dibond 60 BIAE: Shipped on standard TRI pallets. Prior to 1974/75, wrapping was black and orange with two gloves imprinted, and read "complete refractory service". After 1975, wrapping had same color but utilized only one glove imprint. It is unknown if "complete refractory service" was still printed on wrapping.

Fibrous Adhesive: When assembled by GRC, without confirming the actual availability of the packaging, this defendant's sales catalog of 1959 indicates that this product was sold in 1, 5, 32 and 55 gallon drums. The

specification sheet of 1/1/63, indicates that the product was sold in 1,2, and 3 1/2 gallon drums. Since 1973, Fibrous Adhesive was purchased from Johns-Manville and sold in 6 1/2 gallon drums, 24 drums per pallet. Prior to 1973, label was brown and white which read "Fibrous Adhesive". After 1973, the label was black and white with the words "Manville" in black and "Fibrous Adhesive" in white.

Grefco Insulating Cement: Packaged in 50 lb. multi-walled paper bags. A diamond with word "Grefco" inside it. Large lettering under logo read "insulating cement". Smaller lettering near lower part of bag read, "General Refractories Company".

Grefco Insul-Finish Cement: Packaged in 50 lb. multi-walled paper bags. A diamond with word "Grefco" inside it. Large lettering under logo read "insulating cement". Smaller lettering near lower part of bag read, "General Refractories Company".

(7)(8) Litecast 30 and 30G: contained 23% chrysotile asbestos, which was purchased from Johns-Manville.

Steelklad Dibond 60 BIAE: Incorporated between the brick and steel casing was an asbestos spacer board, purchased from Nicolet, Inc. The percentage of asbestos contained in the spacer is unknown to this defendant. The spacer was merely applied between the finished brick and metal casing.

Grefco Insulating Cement: This product was purchased in its final form from Eagle-Picher Industries, Inc., for resale only. Eagle-Picher would be in a better position to answer this interrogatory than this defendant.

Grefco Insul-Finish Cement: This product was purchased in its final form from Eagle-Picher Industries, Inc., for resale only. Eagle-Picher would be in a better position to answer this interrogatory than this defendant.

Fibrous Adhesive: When assembled by GRC, 1955-1973, product contained 14% chrysotile asbestos. From 1973 to 1981, this product was purchased in its final form from Johns-Manville, for resale only. The percentage of asbestos contained is unknown to this defendant.

c. Litecast 30 & 30G: 1961-1973

Steelklad Dibond 60 BIAE: 1967-1978

Grefco Insulating Cement: 1955-1971

Grefco Insul-Finish Cement: 1960-1971

Fibrous Adhesive: Assembled by GRC 1955-1973. From 1973 to 1981, this product was purchased in its final form from Johns-Manville, for resale only.

d. Litecast 30 & 30G:

23% chrysotile asbestos
40% Expanded Perlite Grade P-38
36% Lumnite Cement
1% Bentonite

Steelklad Dibond 60 BIAE

A steel-jacketed directly bonded, magnesite chrome, basic refractory brick containing 60% magnesia. Incorporated between the brick and steel casing was an asbestos spacer board, purchased from Nicolet, Inc. The percentage of asbestos contained in the spacer is unknown to this defendant. The spacer was merely applied between the finished brick and metal casing.

Grefco Insulating Cement: This product was purchased in its final form from Eagle-Picher Industries, Inc., for resale only. Eagle-Picher would be in a better position to answer this interrogatory, than this defendant.

Grefco Insul-Finish Cement: This product was purchased in its final form from Eagle-Picher Industries, Inc., for resale only. Eagle-Picher would be in a better position to answer this interrogatory, than this defendant.

Fibrous Adhesive: When assembled by GRC:

14% chrysotile asbestos
86% Sodium Silicate

When purchased for resale from Johns-Manville, in its final form for resale only. Johns-Manville would be in a better position to answer this interrogatory, than this defendant.

(e) Defendant objects to this interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant sold these products to the specifications of its customers. Defendant is not in a position to say whether these products could be distinguished from those products of competitors.

(f)(g) Refer to response to subparts (4)(5) above.

6. Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, this defendant provides the following response:

Litecast 30:

No. 852156
Registered July 9, 1968
No patent application is currently pending.

Steelklad
No. 573656
Registered April 28, 1953; Reviewed April 28, 1973
No patent application is currently pending.

7. a. Litecast 30 & 30G
Steelklad Dibond 60 BIAE

b.-d. Litecast 30 & 30G ceased to contain asbestos in April, 1973,
when a new mix specification was issued.

Steelklad Dibond 60 BIAE: This product ceased to incorporate
asbestos spacer boards in 1978, when GRC began purchasing non-asbestos
MCB paper from Carborundum.

8. Defendant objects to this Interrogatory on the grounds that it is overly
broad, irrelevant and not reasonably calculated to lead to the discovery of
admissible evidence. Defendant further objects to this interrogatory to the extent
that it seeks information regarding distributors of GRC products that were
distributed to persons and/or entities other than plaintiff's employer(s) as
irrelevant and beyond the scope of this litigation. Without waiving the above
objections and subject thereto, defendant states that a review of its prior
distributor revealed the following three distributors within the State of Ohio:

Adrian L. Wallick Co.
P.O. Box 30671
1013 Gahanna Pkwy.
Columbus, OH 43230
contracted 11/9/64

Allen Refractories Co.
131 Shackleford Road
Pataskala, OH 43062
contracted 4/1/79

King Refractories, Inc.
13421 Mahoning Ave.
North Jackson, OH 63139
contracted 5/16/83

8.01 Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, to the extent that this interrogatory seeks information as whether this defendant ever purchased asbestos-containing products from the specific listed defendants, this defendant states no. However, to the extent that this interrogatory seeks information pertaining to purchases by GRC from defendants not yet listed, defendant will state yes.

8.02 (a) Eagle-Picher Industries, Inc.
Johns-Manville

(b) Eagle-Picher Industries, Inc.:
Grefco Insulating Cement
Grefco Insul-Finish Cement

Johns-Manville:
Fibrous Adhesive

(c) Grefco Insulating Cement: 1955-1971
Grefco Insul-Finish Cement: 1960-1971
Fibrous Adhesive: 1973-1981

8.03 Defendant objects to this Interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory to the extent that it seeks information regarding distributors of GRC products that were distributed to persons and/or entities other than plaintiff's employer(s) as irrelevant and beyond the scope of this litigation. Without waiving the above objections and subject thereto, defendant states if plaintiffs were employed by any of the listed defendants and plaintiffs provide this defendant with that information, this defendant will attempt to provide the information requested.

8.04. Refer to response to interrogatory no. 8.

8.05. Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, the information sought is irrelevant and beyond the scope of this litigation.

8.06. Yes; In further response, refer to response to interrogatory no. 8.02.

8.1. Defendant objects to this Interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory to the extent that it seeks information regarding sales of GRC products that were sold and/or distributed to persons and/or entities other than plaintiff's employer(s) as

irrelevant and beyond the scope of this litigation. Without waiving the above objections and subject thereto, defendant states that if plaintiffs will provide this defendant with the names of specific employer(s) and/or worksite(s), this defendant will attempt to provide the information sought.

8.2 Refer to response to interrogatory no. 8.1.

8.3. Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, the information sought is unwarranted and an unduly burdensome fishing expedition.

8.4. Defendant objects to this Interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory to the extent that it seeks information regarding sales of GRC products that were sold and/or distributed to persons and/or entities other than plaintiff's employer(s) as irrelevant and beyond the scope of this litigation. Without waiving the above objections and subject thereto, yes;

a. Michael Conley, Esquire
225 City Ave., Ste. 114
Bala Cynwyd, PA 19004
Corporate Secretary for GRC

b. copies of these records are in the possession of James F. Israel, Esquire, counsel for GRC.

9. Defendant objects to this Interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory to the extent that it seeks information regarding sales of GRC products that were sold and/or distributed to persons and/or entities other than plaintiff's employer(s) as irrelevant and beyond the scope of this litigation. Without waiving the above objections and subject thereto, to the extent that this interrogatory seeks information with regard to defendant, GRC states that it has employed significant numbers of sales personnel, the vast majority of whom are likely to have had no contact with any of plaintiffs' employers/worksites.

9.1. Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. GRC has employed a significant number of sales personnel since 1930, the vast majority of whom are likely to have had no contact with any of plaintiffs' worksite(s)/employer(s). Without waiving the above objections and subject thereto, defendant states that it has never had a sales office within the State of Ohio. All sales were handled by GRC's Pittsburgh,

Pennsylvania sales office. GRC presently does not have a Pittsburgh sales office. The past sales manager was Dennis McCort.

10. Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, defendant objects to this interrogatory on the basis that it seeks information relating to subsidiaries, related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

11. Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, defendant objects to this interrogatory on the basis that it seeks information relating to subsidiaries, related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

12. GRC	GRC
3501 7th St.	St. Louis, MO
Baltimore, MD 21225	1929-1968
1923-1982	Fibrous Adhesive
Steelklad Dibond 60 BIAE	Litecast 30 & 30G

GRC
State Road 220
Sproul, PA 16682
1911-1994
Fibrous Adhesive
Litecast 30 & 30G

13. None to this defendants' knowledge; however, this defendant is aware of claims made by Eagle-Picher Industries regarding a branding agreement with this defendant. Investigation is continuing as to the genuineness of this claim.

13.1. Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In further response, defendant objects to this interrogatory on the basis that it seeks information relating to subsidiaries, related entities and affiliates of GRC. Insofar as GRC is the named party to this lawsuit, and further, insofar as there is neither an allegation nor any information that any subsidiaries, related entities or affiliates of GRC are involved in this matter, any interrogatory seeking information relating to any subsidiary, related entity and/or affiliate of GRC is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

13.2. No.

14. Defendant objects to this interrogatory on the grounds that it unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states that there were numerous research and development engineers who worked on the development and/or modification of GRC products, that no one person is responsible for these procedures.

15. Litecast 30 & 30G: mixed with water and sprayed or cast onto surface.

Fibrous Adhesive: May be applied like cement.

Steelklad Dibond 60 BIAE: The spacer board may be cut, but once applied to brick, brick is laid.

Grefco Insulating Cement: It was mixed with water on site and applied like cement.

Grefco Insul-Finish Cement: It was mixed with water on site and applied like cement.

16. Defendant objects to this interrogatory on the basis that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant has always manufactured its products to customer specifications and this defendant has no way of knowing how or by whom their products would be used.

17. Defendant objects to this interrogatory on the grounds that it unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states it has a copy of a standard mix specification sheet dated 1/1/63 and a raw specification sheet, undated, for Fibrous Adhesive and mix specification sheets, dated 7/30/62, 9/30/65 and 8/11/70 and 1/24/73 for Litecast 30.

18. GRC did not conduct any tests. GRC has no knowledge whether others may have done so.

18.1. Refer to response to interrogatory no. 18.

19. N/A, refer to response to interrogatory no. 18.

20. N/A, refer to response to interrogatory no. 18.

21. N/A, refer to response to interrogatory no. 18.

22. Defendant objects to this interrogatory on the basis that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Further, defendant objects to this interrogatory on the grounds that it is vague and ambiguous as plaintiff has failed to define the term "effects". Without waiving the above objections and subject thereto, defendant states that it did not conduct any tests. GRC has no knowledge whether others may have done so.

23. GRC did not conduct any studies. GRC has no knowledge whether others may have done so.

24. Not to this defendant's knowledge.

25. Defendant object to this interrogatory on the basis that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. GRC further objects to this interrogatory on the basis that it is vague, ambiguous and otherwise unanswerable. Defendant corporation has no knowledge nor does it maintain any records pertaining to when such information became known to any one individual at GRC. Without waiving the above objections and subject thereto, defendant states that generally such information was obtained as it became available to members of the general public over the past several years through published materials. Further, this defendant states

that John Hartshorn, former President and C.E.O. of GRC obtained a generalized awareness of the potentiality of lung disease from exposure to asbestos, some in the mid 1970's. However, this defendant states that it believes that properly installed and maintained asbestos-containing products do not present a health hazard that there has never been any widely accepted evidence within either the medical or scientific communities that such products pose a hazard to human health.

26. Refer to response to interrogatory no. 25.

27. Defendant assumes that this interrogatory seeks information on medical personnel relating specifically for this defendant's minimal involvement in the assembly and/or sale of asbestos-containing products, and accordingly the answer is none. This defendant did employ plant physicians and other doctors for the general care of its employees, but not specifically for its asbestos-related activities.

28. Refer to response to interrogatory no. 27.

29. Not to this defendant's knowledge.

30. Refer to response to interrogatory no. 39.

30.1. Not to this defendant's knowledge.

30.2. a.,c. Refer to response to interrogatory no. 37.

b.,d. Memberships in the mentioned groups were under GRC's name, only.

31. Defendant objects to this interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant objects to this interrogatory on the grounds that it is not limited to exposure to asbestos dust by users of the end product as compared to exposure during the manufacturing process. Without waiving the above objections and subject thereto, defendant states none.

32. N/A, refer to response to interrogatory no. 31.

33. Defendant objects to this interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states that it became generally familiar with the concept of threshold limit values as it related to asbestos sometime in the mid 1970's, but not specifically as it related to GRC's asbestos-containing products. Further, the "maximum allowable concentration" to which plaintiff refers, is unknown to this defendant.

33.1. Not to this defendant's knowledge.

34. This defendant did not maintain an established library; however, employees were generally advised to keep abreast of developments in their respective areas of responsibilities.

35. Not to this defendant's knowledge.

36. N/A, as this defendant is not aware of the mentioned article to which plaintiff refers.

36.1. No

36.2. No

37. This defendant has no knowledge whether other members of the following organizations were manufacturers, miners and/or distributors of asbestos-containing products. However, this defendant states that it has been a member of the following organizations:

Industrial Health Foundation	1954-1981
Refractories Institute	1961-1994
National Safety Council	1930-1994
American Industrial Hygiene Assn.	, dates unknown

(i) Defendant further objects to this interrogatory on the grounds that it is overly vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, what information GRC obtained after it last sold asbestos-containing products has no relevance whatsoever to any issue in dispute. Without waiving the above objections and subject thereto, this defendant states that it recently came into possession of several publications by the Industrial Hygiene Foundation and a Membership Report published by the Refractories Institute, which were received during the course of litigation. This defendant has no other documents responsive to this Interrogatory.

38. None to this defendant's knowledge.

39. Among the periodicals to which this defendant subscribed are the BNA Occupational Safety and Health Reporter, the National Safety News, Occupational Hazards and possibly the BNA Chemical Regulation Reporter. This defendant has no knowledge of any article being printed or withheld from printing in the periodicals referred to in this interrogatory, pertaining to potential hazards of asbestos.

40. Defendant does not possess enough substantial information to provide a response to this interrogatory. Investigation is continuing.

41. This defendant never affixed warning labels to the asbestos-containing products it assembled: Fibrous Adhesive and Litecast 30 & 30G.

This defendant has become aware that on 6/2/64, John P. Harrington, General Sales Manager for Eagle-Picher Industries, Inc., advised William Boyd, a then employee of this defendant, that Eagle-Picher was placing a cautionary note on their products that contained asbestos. On 6/9/64, Mr. Boyd advised Eagle-Picher to place the same cautionary note on the asbestos-containing products GRC was purchasing for resale.

a. Grefco Insulating Cement and Grefco Insul-Finish Cement

b. To this defendant's knowledge, the cautionary note for Eagle-Picher products was to read as follows:

"Caution, This product contains asbestos fiber."

Inhalation of asbestos in excessive quantities over long periods of time may be harmful.

If dust is created when this product is handled, avoid breathing the dust.

If adequate ventilation control is not possible, wear respirators approved by the U.S. Bureau of Mines for pneumoconiosis producing dust.

c, e.-i. Eagle-Picher Industries, Inc. would be in a better position to respond to these Interrogatories than this defendant.

d. Refer to response to interrogatory no. 41.

f. No

g., h. These documents are in the possession of James F. Israel, Esquire, Israel, Wood & Puntl, P.C., Ste. 501, Grant Bldg., Pittsburgh, PA.

42. This defendant has prepared sales materials for the purposes of marketing its entire line of products and not specifically for its asbestos-containing products. Further, this defendant has advertised in newspapers and magazines within the refractory trade. However, these advertisements were promotions on behalf of the defendant as a supplier of refractories in general and not specific products.

a. No single person was ever principally responsible for the sale or marketing of asbestos-containing products. Joseph Smith, Past Director of Marketing Communications for GRC from 1973 to 1990, was involved with the preparation of GRC sales catalogs, brochures and literature.

b. These materials are in the possession of GRC.

c. Annually

d. Refer to response to interrogatory no. 42.

43. Since 1970, this defendant has provided Material Safety Data Sheets to its customers, upon request. These Material Safety Data Sheets were prepared by the following:

a. Walter Heid, Manager of Safety Engineering; Upon his departure, Robert Bodnar, Safety Management Personnel Manager for GRC; Upon his departure, Barney Fowler became Safety Manager for GRC. Upon his departure, it was Kari Moe. At present, none.

b. James F. Israel, Esquire, counsel for GRC

c. provided upon request

44. N/A, refer to response to interrogatory no. 9. Further, since 1970, this defendant has provided Material Safety Data Sheets to its customers, upon request. GRC also provided Product Identification Sheets to customers upon request.

45. Defendant objects to this interrogatory as it is overly broad, unduly burdensome and seeks information not reasonably calculated to lead to the discovery of admissible evidence and it calls for speculation to the extent it seeks information from this defendant regarding products of other defendants. Also, whether or not "all potential health hazards" can be eliminated is irrelevant to any issue in dispute. Additionally, health hazards, if any, associated with these products but not related to asbestos are irrelevant.

46. Refer to response to interrogatory no. 8.1.

47. Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of

admissible evidence. Further, this interrogatory seeks information regarding employees of GRC. Plaintiffs were not such employees.

47.1. Defendant objects to this interrogatory on the basis that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant has always manufactured its products to customer specifications and any alteration was made for product improvement. Without waiving the above objections and subject thereto, please refer to a copy of the 1/1/73 memorandum from Product Development to Sproul Works regarding the modification of Litecast 30 & Fibrous Adhesive. This defendant has no other documents responsive to this request.

47.2. Not to this defendant's knowledge.

47.3. Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, this interrogatory seeks information regarding employees of GRC. Plaintiffs were not such employees.

47.4.

48. No

48.1. a.-d. This defendant objects to this interrogatory as it is almost impossible to respond given the length of time it encompasses and the available technology at various times. However, without waiving the above objections and subject thereto, this defendant states that various records were maintained through computer generated printouts and/or hard files. In further response, this defendant implemented a record management program in late 1972 or early 1973, whereas each department was responsible for initiating action pursuant to the program for documents or records within their domain.

e. Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states that there is no one person was directly responsible for the collection or maintenance of these records. However, the previous custodians of these records were Raymond Bradley, George Poelcher, Robert Emsley, Frederick Root, and Michael Cull. The present custodian is Michael Conley.

48.2 Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, plaintiffs have failed to specify a specific time period. Without waiving the above objections and subject thereto,

defendant states that various documents were destroyed in accordance with this defendants' record retention policy.

48.3 Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states none.

48.4 Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, defendant states none.

49. No.

50. Yes; Investigation is continuing to develop a basis for this contention.

51. Investigation is continuing to develop a basis for this contention.

52. Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant is not in the business of manufacturing respiratory equipment, therefore, defendant is not qualified to respond to this interrogatory.

53. Yes; however, expert witnesses have not yet been determined.

54. Unknown at this time as expert witnesses have not yet been determined.

55. Yes

55.1 This request is premature. Many of these facts and supporting documents are obtained during the course of discovery. They are obtained at the depositions of plaintiffs, co-workers, family members, doctors, and other witnesses. Documents are obtained from plaintiffs, plaintiffs' former employers, work site owners or operators, or various physicians, hospitals, and other medical providers who have examined or treated plaintiffs. All such witnesses and such documents which this defendant intends to use at time of trial will be listed in this defendant's pretrial statement.

56. GRC asserts it has coverage. Currently, Allstate Insurance, as successor to Northbrook Insurance, INA and Employers Liability Assurance Corporation are all providing coverage to this defendant.

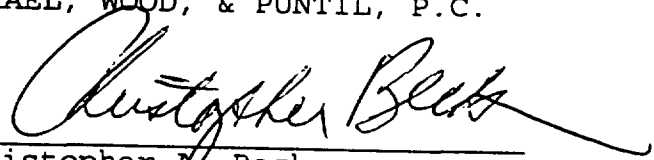
56.1. Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Further, this interrogatory seeks information that is irrelevant and beyond the scope of this litigation. Without waiving the above objections and subject thereto, defendant states that it was involved in extensive litigation with its carriers, prior to February, 1996, which has been resolved. All documents associated with this litigation is available to plaintiffs through the courts.

57. Other than those persons already listed in responses to interrogatories, as well as those persons identified by plaintiffs in their responses to interrogatories, there are no other persons known to this defendant who have such knowledge. Investigation is continuing.

58. 1981

ISRAEL, WOOD, & PUNTIL, P.C.

By


Christopher A. Beck
501 Grant Building
310 Grant Street
Pittsburgh, PA 15219
(412) 391-1114

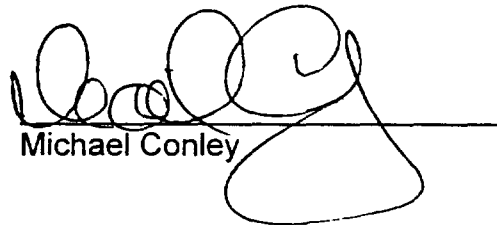
Attorneys For Defendant
General Refractories Company

AFFIDAVIT

Commonwealth of Pennsylvania :

County of Montgomery :

Before me, the undersigned authority, personally appeared Michael Conley, Esquire, who being duly sworn according to law, deposes and says that he is Corporate Secretary of General Refractories Company, that, as such, he is duly authorized to execute this Affidavit on behalf of General Refractories Company and that the facts set forth in the foregoing General Refractories Company's Responses to Plaintiff's Interrogatories and Request for Production of Documents are true and correct to the best of his knowledge, information and belief.

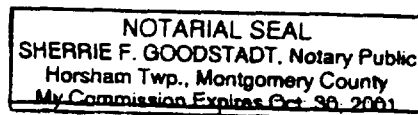


Michael Conley

Sworn to and subscribed before me
this 17th day of October, 1997.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached

RESPONSES OF GENERAL REFRACTORIES COMPANY
TO PLAINTIFFS' MASTER SET OF
INTERROGATORIES PROPOUNDED TO
DEFENDANT, GENERAL REFRACTORIES COMPANY

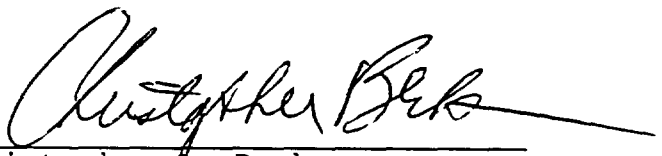
were today served upon plaintiffs' counsel by sending the same to
them via Airborne Express at their office address as follows:

Ladd Gibke, Esquire
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, TX 75219

and via first class U.S. mail postage prepaid to plaintiffs'
counsel at their office address as follows:

Bruce Carter, Esquire
Baron & Budd, P.C.
43-B New Garver Road
Monroe, OH 45050

Dated: November 6, 1997



Christopher A. Beck