

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HAZEL ROUSE, Executrix of the Estate)
of CLARENCE ROUSE, Deceased, and)
HAZEL ROUSE, in her own right,)

Plaintiff,)

vs.)

Civil Action 81-581

JOHNS-MANVILLE CORPORATION, a)
corporation, et al.,)

Defendants.)

ANSWERS OF RAYBESTOS-MANHATTAN, INC. TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES
DIRECTED TO THE DEFENDANTS

AND NOW COMES the plaintiff, pursuant to Federal Rule of Civil Procedure 33 and makes their her First Set of Interrogatories to be answered by the respective defendants: Johns-Manville Products Corp., Johns-Manville Sales Corporation, Unarco Industries, Inc., GAF Corp., Raybestos-Manhattan, Inc., The Celotex Corp., Keene Building Products Corp., Eagle Picher Industries, Inc., Forty-Eight Insulations, Inc., Owens-Corning Fiberglas Corp., Owens-Illinois, Inc., Atlas Asbestos Co., Ltd., Bendix Corp., Wagner Electric Sales Corp., Wagner Electric Corporation of Studebaker Worthington, Inc., General Motors Corp., Delco Moraine Division, Gatke Corp., Babcock & Wilcox., A. P. Green Refractories Co., Carey-Canada, Inc., Garlock, Inc., and Borg-Warner Corp., separately and fully, in writing, under oath. Each of the following Interrogatories is intended to be a continuing Interrogatory and plaintiff hereby demands that in the event at any later date the defendants obtain any additional facts, or form any conclusions, opinions, or contentions different from those set forth in their answers to such interrogatories, such defendant shall amend their answers promptly and sufficiently in advance of any trial to fully set forth such differences. If the space provided after each Interrogatory for Defendant's answer is not sufficient, use additional sheets, numbered, for example, in the case of Interrogatory #1, 1-(a), 1-(b), 1(c), etc., after each such Interrogatory, and insert same in the proper order in all copies filed and served. Where an

interrogatory asks that writings be identified, please identify each responsive writing by a brief description, date, author, length, to whom sent, and current custodian or possessor (give both name, address and business affiliation).

1. Please state the name, address and job title of each person who has supplied information used in answering these interrogatories, indicating with specificity each such person responsible for each and every interrogatory.

ANSWER: See Rider A.

2. Please state whether or not you are a corporation. If so, please state:

- (a) Your correct corporate name;
- (b) The state and date of your incorporation;
- (c) The address of your principal place of business;
- (d) The years in which you have regularly conducted business in the State of Pennsylvania.

ANSWER: See Rider B.

3. Does the defendant have any predecessors-in-interest who manufactured any product made with asbestos or asbestos components? If so, please state as to each such predecessor-in-interest:

- (a) What was the name of the predecessor?
- (b) Was the predecessor a corporation?
- (c) What was the state and date of its incorporation?
- (d) What was the address of the principal place of business?

(e) By what manner was the predecessor acquired by this defendant, i.e., purchase, merger, change of name, stock subscription, joint venture, partnership, lease, etc.?

(f) Were the liabilities of the predecessor assumed by the defendant. If so, indicate whether this assumption included the liability for claims filed for physical injury sustained by individuals as a result of exposure to the asbestos containing products manufactured by the predecessor.

(g) If the liabilities of the predecessor were not assumed by the defendant indicate why not.

ANSWER: See answer to Interrogatory No. 2.

4. Does the defendant have any predecessors-in-interest who sold any product made with asbestos or asbestos components?

(a) If so, what was the name of said predecessor?

(b) Was this predecessor a corporation?

(c) If so, what was the state and date of incorporation?

(d) What was the address of the principal place of business?

(e) By what manner was the predecessor acquired by this defendant, i.e. purchase, merger, change of name, stock subscription, joint venture, partnership, lease, etc.

ANSWER: See answer to Interrogatory No. 2.

5. As to each predecessor identified in Interrogatory 3 or 4:

(a) Identify all writings (e.g., contracts, articles of merger, leases, stock subscriptions, etc.) which established any terms or conditions incident to defendant's acquisition of its business interest in the predecessor;

(b) Identify all writings which purported to limit in any manner defendant's liability for previous acts of the predecessor business entity from which defendant acquired its business interest.

ANSWER: Raymark Industries, Inc. ("Raymark") objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

6. As to each writing identified in Interrogatory 5, state the specific page(s) which purported to so limit defendant's liability.

ANSWER: Not applicable.

7. As to each predecessor identified in Interrogatory 3 or 4:

(a) Identify all writings (e.g., contracts, articles of merger, leases, stock subscriptions, etc.) which established any terms or conditions incident to defendant's termination of its business interest in the predecessor.

(b) Identify all writings which purported to limit in any manner defendant's subsequent liability for acts in connection with the predecessor which occurred prior to defendant's termination of its business interest in the predecessor.

ANSWER: See Answer to Interrogatory No. 5

8. As to each writing identified in Interrogatory 7, state the specific page(s) which purported to so limit defendant's liability.

ANSWER: Not applicable.

9. If you will do so without a separate Motion to Produce, please attach to the answers to these Interrogatories each writing identified in response to Interrogatories 5 and 8.

ANSWER: Not applicable.

10. When did the defendant or any of defendant's predecessors-in-interest first manufacture any product made with asbestos or asbestos components?

ANSWER: The early 1900's.

11. When did the defendant or any of defendant's predecessors-in-interest first sell any product made with asbestos or asbestos components?

ANSWER: See answer to Interrogatory No. 10.

12. If the defendant has discontinued manufacturing and/or selling products made with or from asbestos or asbestos components, when was the last date of said manufacture and/or sale of said products?

ANSWER: Raymark objects to this Interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in that it fails to limit itself to the specific asbestos products, time periods or locations for which the plaintiff alleges exposure. If the plaintiff will specify the products or applications to which this question applies, Raymark will determine whether and when any such products were discontinued.

13. When did the defendant or any of its predecessors-in-interest first determine that any other product could be used in place of asbestos for high temperature insulation and other uses of asbestos?

- (a) What was the chemical composition of that product?
- (b) When was the product above referenced first marketed?
- (c) Under what trade name was the product marketed?
- (d) For what purposes or applications was the product marketed?

ANSWER: Raymark objects to this question because the plaintiff has failed to specify the product applications inquired of. If the plaintiff will identify what products and applications fall within this inquiry, Raymark will ascertain whether any substitute products have been developed. See also answer to Interrogatory No. 52

14. If the defendant or any of its predecessors-in-interest has discontinued manufacturing and/or selling asbestos products, please state the reason or reasons therefore for each product discontinued.

ANSWER: See answer to Interrogatory No. 5

15. Please state each and every product manufactured and/or sold by the defendant or any of defendant's predecessors-in-interest which contained asbestos in any form or quantity.

ANSWER: See answer to Interrogatory no. 12

16. Please state by weight and volume the quantitative percentage of asbestos or asbestos fibers in each and every product identified in answer to Interrogatory #15.

ANSWER: See answer to Interrogatory No. 12.

17. Please state the percentage, by weight and volume, of each of the following types of asbestos - chrysotile, crocidolite and amosite - contained in each of the products identified in answer to Interrogatory #15.

ANSWER: See answer to Interrogatory No. 12.

18. Please state the years during which each product identified in answer to Interrogatory #15 was manufactured, and/or sold by defendant or any of its predecessors-in-interest.

ANSWER: See answer to Interrogatory No. 12.

19. Did any of the asbestos-containing products manufactured and/or sold by the defendant or any of defendant's predecessors-in-interest prior to April 1, 1972 ever contain any caution, warning, caveat or other statement or explanation on the product or its packaging? If so, please state:

(a) When did each warning or statement first appear?

(b) What was the precise wording of each warning or other statement when it first appeared?

(c) Has any warning or statement been altered, amended or changed in any manner? If so, how and when was each of these warnings or statements so amended?

(d) Where was each warning or statement located on each product or packaging?

ANSWER: See answer to Interrogatory No. 20.

20. Do any of the asbestos-containing products manufactured and/or sold by the defendant now or since April 1, 1972 contain any caution, warning, caveat or other statement or explanation on the product or its packaging? If so, when did each of these warnings or other statements first appear?

ANSWER: See Rider C.

21. What now is the precise wording of each of the warnings or other statements contained on products identified in answer to Interrogatory #20; and, where is each of these warnings or statements located on each product or packaging?

ANSWER: See answer to Interrogatory No. 20.

22. Please identify each and every writing, diagram, symbol, sample or photograph (color and black and white) which depicts any of the cautions, warnings, caveats or other statements or explanations stated in answer to Interrogatories #19, #20, and #21.

ANSWER: See answer to Interrogatory No. 20.

23. If you will do so without a separate Motion to Produce, please attach to your answers to these Interrogatories a copy (color photograph if obtainable) of each writing, diagram, symbol, sample or photograph identified in answer to Interrogatory #22.

ANSWER: Raymark objects to this Interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in that it fails to limit itself to the asbestos products to which the plaintiff alleges exposure.

24. Please state the names and addresses of the defendant's and defendant's predecessor-in-interest chief medical officers from 1930 until the present time, listing the specific years and periods of time each such medical officer was employed by defendant or defendant's predecessor-in-interest in that capacity.

ANSWER: See Rider D.

25. Please state to whom in the corporate structure each of the chief medical officers identified in answer to Interrogatory #24

reported, also giving each of those person's position or job title with defendant or defendant's predecessor-in-interest.

ANSWER: See Rider D.

26. Please state the duties and responsibilities of each of the chief medical officers identified in answer to Interrogatory #24, also stating the year in which each such duty or responsibility first arose.

ANSWER: See Rider D.

27. Please state the names and addresses of all physicians including consultants, who were employed, retained or otherwise engaged by the defendant or any of defendant's predecessors-in-interest at any time during the years of 1930 until the present time at a central office or at any location which manufactured and/or sold any asbestos-containing product. As to each such person, please state:

(a) The specific years and periods of time he or she was so employed, retained or otherwise engaged;

(b) The nature of the services performed by that person; and

(c) The facility or office to which he or she reported.

ANSWER: Prior to 1976, Raymark maintained no central medical office. See also Rider D.

28. Please state the names and addresses of all persons including consultants who were employed, retained or otherwise engaged by the defendant or any of defendant's predecessors-in-interest at any time from 1930 until the present time at a central office or at any location which manufactured and/or sold any asbestos-containing product and who functioned as industrial hygienists. Please state as to each such person:

- (a) The facility or office to which he or she was assigned;
- (b) His or her complete and precise duties and responsibilities; and
- (c) The specific years and period of time he or she was so employed, retained or otherwise engaged.

ANSWER: See Rider E.

29. Please state if the defendant or any of defendant's predecessors-in-interest or anyone on behalf of the defendant or any of defendant's predecessors-in-interest ever engaged in any research of asbestos dust and fibers and their effect on the persons coming in contact with the asbestos dust or fibers. If so, please state:

- (a) The names and addresses of all individuals or groups who engaged in such research;
- (b) The complete results of said research;
- (c) What recommendations, if any, were made as a result of said research;
- (d) If either the results or recommendations of such research were written, please identify all writings containing such results or recommendations.

ANSWER: See Rider F.

30. Please state if any of the physicians, industrial hygienists, or other persons stated in answer to Interrogatories #24, #27, #28 and #29 ever made at any time any recommendations and/or suggestions to the defendant or any of defendant's predecessors-in-interest pertaining to the risks or hazards to persons involved in the manufacturing or use of any asbestos-containing product. If so, please state:

(a) When was each such recommendation and/or suggestion made?

(b) To whom was each such recommendation and/or suggestion made?

(c) By whom was each such recommendation and/or suggestion made?

(d) The substance of each recommendation and/or suggestion.

ANSWER: Raymark objects to this interrogatory because it is unduly vague in its use of the phrase "recommendations and/or suggestions . . . pertaining to the risks."

31. Please identify all writings addressed, directed or submitted to defendant or any of defendant's predecessors-in-interest by any of the physicians, industrial hygienists or other persons stated in answer to Interrogatories #24, #27, #28, and #29.

ANSWER: Not applicable.

32. If you will do so without a separate Motion to Produce, please attach to your answers to these Interrogatories a copy of each writing identified in Interrogatory #31.

ANSWER: Not applicable.

33. Please state the names and addresses of any organizations, groups, inter-company or industrial organizations to which the defendant or any of defendant's predecessors-in-interest belongs or has ever belonged which conducted studies or researched the relationship between exposure to asbestos fibers or products and adverse health effects.

ANSWER: See answer to Interrogatory No. 29. In addition, there may be other studies conducted by organizations listed in Rider J of which Raymark is not aware.

34. Please identify each and every study or research project referred to in Interrogatory #33 and as to each such study or research project, please state:

- (a) The type or nature of the study;
- (b) When and where the study was conducted;
- (c) The complete results of the study;
- (d) The recommendations of the study;
- (e) The nature of the resulting implementation of the study recommendations by defendant or any of defendant's predecessors-in-interest;
- (f) The date when the defendant or any of its predecessors-in-interest first implemented the study recommendations; and.
- (g) The names and addresses of all individuals who worked on the study or research project.

ANSWER: See answer to Interrogatory No. 29. In addition, there may be other studies conducted by organizations listed in Rider J of which Raymark is not aware.

35. If you will do so without a separate Motion to Produce, please attach a copy of each study or research project identified in answer to Interrogatory #34.

ANSWER: Not applicable.

36. Please state the amount spent or contributed annually by the defendant or any of defendant's predecessors-in-interest from 1930 until the present time for research into the relationship between the exposure to asbestos dust, fibers or products and any adverse health effects.

ANSWER: See Rider G.

37. Please state the amount annually contributed by the defendant or any of defendant's predecessors-in-interest to any independent medical research group or groups conducting research into the relationship between exposure to asbestos fibers, dust or products and any adverse health effects.

ANSWER: See Rider G.

38. Please state whether the defendant or any of defendant's predecessors-in-interest has or ever had a department, division or section devoted to scientific and/or medical research at any time during the period from 1930 until the present time. If so, please state:

(a) When it was formed;

(b) Who directed it in each year in which it existed after 1930;

(c) What were its activities in each year after 1930.

ANSWER: See Rider H.

39. Please state all scientific and medical periodicals and journals, both American and foreign, to which the defendant or any of defendant's predecessors-in-interest, their medical departments or industrial hygiene divisions subscribed at any time during the period between 1930 and the present time; and, give the years of subscription for each such periodical or journal.

ANSWER: See Rider I.

40. Does or has the defendant or any of its predecessors-in-interest ever manufactured any asbestos-containing product under any trade name, brand name or registered trademark? If so, please state the name or trade name of each such product and with whom it was registered and when.

ANSWER: See answer to Interrogatory No. 12.

41. Please state the distributor(s) of the defendant's or any of defendant's predecessors-in-interest asbestos-containing products in the

State of Pennsylvania from 1930 until the present time. Also, please state from 1930 until the present time when defendant sold its asbestos-containing products to each such distributor.

ANSWER: Raymark objects to this interrogatory because it is overly broad, unduly burdensome and oppressive in failing to specify the entities inquired of. If the plaintiff will specify what "distributors" allegedly sold asbestos-containing products to the plaintiff's employer, Raymark will review its sales records to ascertain whether Raymark ever sold to those companies.

42. Please state whether any of the distributors stated in answer to Interrogatory #41 were provided with any special instructions, oral or written, in regard to the use of the defendant's or any of defendant's predecessors-in-interest asbestos-containing products other than the cautions, warnings, caveats, or other statements stated in answer to Interrogatories #19 and #20. If so, please state:

- (a) When these instructions were given;
- (b) By whom these instructions were given;
- (c) Were the instructions oral or written;
- (d) The precise content of the instructions;
- (e) If the instructions were written, please identify each such writing.

ANSWER: Not applicable.

43. If you will do so without a separate Motion to Produce, please attach to your answers to these Interrogatories a copy of each writing identified in Interrogatory #42.

ANSWER: Not applicable.

44. Please state the name and location of each and every facility now or previously owned or controlled by the defendant or any of defendant's predecessors-in-interest which at any time manufactured any asbestos-containing product. As to each such facility, please state:

- (a) Its years of operation;
- (b) The products it manufactured in each year of its operation; and
- (c) Whether the facility is still in operation, and if not, why and when did manufacturing operations stop.

ANSWER: Raymark produces textile asbestos products at plants in North Charleston, South Carolina, Marshville, North Carolina, Manheim, Pennsylvania and friction products at plants in Manheim, Stratford, Connecticut and Crawfordsville, Indiana.

45. Please state whether any present or former employee of the defendant or any of defendant's predecessors-in-interest has ever made a claim for asbestosis, mesothelioma, lung cancer, any other pulmonary disorder or gastrointestinal system cancer under the Occupational Disease or Workmen's Compensation Statute of any state or any Federal Compensation Statute, including but not limited to the Longshoremen and Harborworker's Compensation Act. If so, please state:

- (a) The date that the defendant or any of defendant's predecessors-in-interest first received notice of each such claim;
- (b) The date, name, state, and stated basis for each such claim;
- (c) The disposition of each such claim;
- (d) If writings exist pertaining to any such claim, please identify all such writings.

ANSWER: Raymark first received claims for workmen's compensation benefits from its manufacturing plant employees for asbestosis in 1933, carcinoma in 1950 and mesothelioma in 1962. To the extent this interrogatory seeks additional information, it is objected to because it is overly broad, seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and because it is unduly burdensome and oppressive.

46. If you will do so without a separate Motion to Produce, please attach a copy of each writing identified in Interrogatory #45.

ANSWER: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and because it poses an undue burden on Raymark.

47. Please state the total number of present or former employees of the defendant or any of defendant's predecessors-in-interest who are now receiving or who have ever received benefits under any Occupational Disease or Workmen's Compensation Statute for each year from 1930 until the present time for each of the following:

- (a) Asbestosis;
- (b) Lung Cancer;
- (c) Mesothelioma;
- (d) Any other pulmonary disorder;
- (e) Gastrointestinal System Cancer.

ANSWER: See answer to Interrogatory No. 46.

48. Has the defendant or any of defendant's predecessors-in-interest ever been a member of the Asbestos Textile Institute? If so, please state:

- (a) When did the defendant or its predecessor-in-interest first become a member;
- (b) When did the defendant or its predecessor-in-interest discontinue its membership; and

(c) What were the requirements for membership, including initiation and annual membership dues, for each year in which defendant or any of its predecessors-in-interest were a member.

ANSWER: See Rider J.

49. How much has the defendant or any of defendant's predecessors-in-interest contributed annually to the Asbestos Textile Institute in each year since 1936?

ANSWER: See answer to Interrogatory No. 46.

50. Has the defendant or any of defendant's predecessors-in-interest ever been a member of the Industrial Health Foundation (IHF)? If so, please state:

(a) When did the defendant or its predecessor-in-interest first become a member;

(b) When did the defendant or its predecessor-in-interest discontinue its membership; and

(c) What was the amount of money contributed to the IHF by the defendant or its predecessor-in-interest in each year of membership.

ANSWER: See answer to Interrogatory No. 48

51. Please state each trade association, industrial organization or other group (other than the Asbestos Textile Institute and the Industrial Health Foundation) to which defendant or any of defendant's

predecessors-in-interest have ever belonged since 1900 which is or has engaged at least in part in research, education, public advocacy, or lobbying concerning occupational safety and health matters. As to each such association, organization, or group, please state:

(a) When did defendant or any of its predecessors-in-interest first become a member;

(b) When did defendant or any of its predecessors-in-interest discontinue its membership;

(c) What were the requirements for membership, including initiation and annual membership dues, for each year in which defendant or any of its predecessors-in-interest were a member.

ANSWER: See answer to Interrogatory No. 48.

52. Please state each scientific conference, public meeting or educational course concerning any occupational health matter, conducted prior to December 31, 1972, which was attended by any officer or employee of defendant or any of defendant's predecessors-in-interest. As to each such conference, meeting or educational course please state:

(a) Its date(s);

(b) Its sponsoring organization;

(c) The officers or employees of the defendant or any of defendant's predecessors-in-interest who attended it.

ANSWER: See answer to Interrogatory No. 46. Without waiving the objection and subject thereto, to the extent that documents exist which are responsive to this question, they are in the custody of Pitney, Hardin, Kipp & Azuch, Esqs., 163 Madison Avenue, Morristown, New Jersey, where they were maintained by Raymark. The burden of deriving the information sought herein is substantially the same for plaintiff as for Raymark. To the extent that such documents are not privileged, they are available for inspection and copying in Morristown, New Jersey at the propounding party's expense during normal business hours upon reasonable notice to counsel.

53. Please state each private meeting or discussion held at any time before December 31, 1972 between any officer or employee of the defendant or any of defendant's predecessors-in-interest and any officer or employee of any other manufacturer or seller of asbestos-containing products in which the safety of any asbestos-containing product was a subject of discussion. As to each such meeting or discussion, please state:

- (a) Its date;
- (b) The participants in the meeting or discussion identified by name, title and business affiliation;
- (c) A description of all statements made by each participant concerning the safety of any asbestos-containing product.

ANSWER: See answer to Interrogatory No. 52.

54. Please identify all writings pertaining in any manner to the matters covered in Interrogatories #51, #52 and #53.

ANSWER: See answer to Interrogatory No. 51, 52 and 53.

55. To the extent you will do so without a separate Motion to Produce, please attach a copy of all writings identified in Interrogatory #54.

ANSWER: See answer to Interrogatory No. 54.

56. Please state whether defendant or any of defendant's predecessors-in-interest at any time operated a "contract unit", that is, a business which employed asbestos insulator-applicators to perform insulation work at various locations, such as power houses, atomic plants, steel plants, various forms of manufacturing plants and commercial dwellings. If so, please state the following as to each such "contract unit":

- (a) The name and address of the "contract-unit";
- (b) The nature of the business organization of the "contract-unit", i.e., whether a division, wholly owned subsidiary, partnership, joint venture, etc.
- (c) The year in which the "contract-unit" first functioned as a part of or in association with defendant or defendant's predecessor-in-interest.
- (d) The last year that the "contract-unit" functioned as a part of or in association with the defendant or defendant's predecessor-in-interest.
- (e) The number of employees employed by the "contract-unit" during each year in which said "contract-unit" was part of or in association with the defendant or defendant's predecessor-in-interest.
- (f) The name of the person(s) in charge of the "contract-unit", whether designated as president, foreman, supervisor or any other title, for each year the "contract-unit" was part of or in association with the defendant or defendant's predecessor-in-interest.

ANSWER: These interrogatories are not applicable to Raymark because Raymark does not operate "contract units."

57. If defendant or any of its predecessors-in-interest ever maintained one or more "contract-units" as referred to in Interrogatory #56, please state the Workmen's Compensation carrier, if any, for each "contract-unit" for each year that the "contract-unit" was part of or in association with the defendant or defendant's predecessor-in-interest.

ANSWER: These interrogatories are not applicable to Raymark because Raymark does not operate "contract units".

58. Please state whether any of the past or present employees of any "contract-unit" identified in Interrogatory #56 has ever made a claim for asbestosis, mesothelioma, lung cancer, any other pulmonary disorder or gastrointestinal system cancer under the Occupational Disease or the Workmen's Compensation Statute of any state or any Federal Compensation Statute including, but not limited to, the Longshoremen and Harborworker's Compensation Act. If so, please state:

(a) The date that the defendant or any of defendant's predecessors-in-interest or defendant's contract-unit first received notice of each such claim;

(b) The date, name, state, and stated basis for each such claim;

(c) The disposition of each such claim;

(d) If writings exist pertaining to any such claim, please identify all such writings.

ANSWER: These interrogatories are not applicable to Raymark because Raymark does not operate "contract units."

59. If you will do so without a separate Motion to Produce, please attach a copy of each writing identified in Interrogatory #58.

ANSWER: These interrogatories are not applicable to Raymark because Raymark does not operate "contract units".

60. Please state the total number of present or former employees of the defendant or any of defendant's predecessors-in-interest "contract-units" who are now receiving or who have ever received benefits under any Occupational Disease or Workmen's Compensation Statute for each year from 1930 until the present time for each of the following:

- (a) Asbestosis;
- (b) Lung Cancer;
- (c) Mesothelioma;
- (d) Any other pulmonary disorder;
- (e) Gastrointestinal System Cancer.

ANSWER: These interrogatories are not applicable to Raymark because Raymark does not operate "contract units".

61. Please state whether the defendant or any of defendant's predecessors-in-interest ever conducted any industrial hygiene testing in the field, that is, where their asbestos-containing products were being used in the thermal insulation business, to determine what levels of asbestos dust and/or fibers became airborne in such work places. If so, please state the following:

- (a) The date of each such test;

- (b) The location of each such test;
- (c) The method of sampling utilized in each such test;
- (d) The method of fiber, particle, or mass counting utilized in each such test;
- (e) The results of each such test;
- (f) The individuals who conducted each such test;
- (g) If there are any writings concerning any such test, please identify all such writings.

ANSWER: See Rider F.

62. If you will do so without a separate Motion to Produce, please attach a copy of all writings identified in Interrogatory #61.

ANSWER: See answer to Interrogatory No. 5. Without waiving the foregoing objection and subject thereto, see Rider K.

63. Please identify all writings (employee newsletters, posters, directives, flyers, letters, etc.) of defendant or any of defendant's predecessors in interest which were at any time provided to or directed at employees of defendant or any of defendant's predecessors-in-interest, and which contain any caution, warning, direction, suggestion or recommendation as to the safe handling of asbestos or any asbestos-containing product.

ANSWER: See Rider K

64. If you will do so without a separate Motion to Produce, please attach a copy of all writings identified in Interrogatory #63.

ANSWER: See answer to Interrogatory No. 52.

65. Please describe in detail the boxes, packaging or other containers used for each thermal insulation product containing asbestos manufactured or sold by defendant or any of its predecessors-in-interest at any time from 1930 until the present time.

ANSWER: See Rider L.

66. Please identify all sales brochures, sales catalogs, advertising literature, diagrams, samples and photographs (color and black and white) pertaining to the products and boxes, packaging or other containers referred to in Interrogatory #65.

ANSWER: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in that it fails to limit itself to the specific asbestos products to which the plaintiff alleges exposure.

67. If you will do so without a separate Motion to Produce, please attach a copy of all writings and photographs (color photograph if obtainable) identified in Interrogatory #66.

ANSWER: See answer to Interrogatory No. 52.

68. With reference to the products referred to in Interrogatory #65, please state the name and address of each supplier of boxes, packaging or other containers for each such product for each year in which it was manufactured and/or sold by defendant or any of defendant's predecessors-in-interest.

ANSWER: See answer to Interrogatory No. 46.

69. Please state all insurance which the defendant or any of its predecessors-in-interest has or once had which conceivably insures against claims such as those asserted in this action. As to each such insurance policy, please state:

- (a) Name of company or companies;
- (b) Dates of coverage for each company;
- (c) Policy number for each policy;
- (d) Whether coverage is on basis of exposure or manifestation;
- (e) Type of coverage, i.e., liability, excess, errors and omissions, etc.;
- (f) Limitations on coverage, i.e., deductibles, amounts of coverage, whether punitive damages are specifically excluded, etc.;
- (g) Policy limits in dollars and whether policy is per "incident or occurrence" or whether limits are for all claims;
- (h) Whether policy limits have been paid out in full and if not to what extent does coverage remain as of this date;
- (i) State which officer, employee, agent of the defendant is most familiar with defendant's insurance coverage;
- (j) Identify all writings pertaining to the matters questioned in (a)-(i) above.

ANSWER: See Rider M.

70. If you will do so without a separate Motion to Produce, please attach all policies and other writings identified in Interrogatory #69.

ANSWER: See answer to Interrogatory No. 46.

71. State the names and addresses of all witnesses whom you presently intend to call to testify at trial. Supplement this list as you ascertain any additional witnesses.

ANSWER: Defendant Raybestos-Manhattan has not decided as yet which witnesses it will call at trial. When this decision is made, plaintiff will be advised.

72. State the name and address of each person whom you expect to call as an expert witness at trial as to any contention whether medical, cause and effect, or any other matter for which you intend to have expert testimony. With respect to each such expert, state the following:

- (a) Describe the expert's educational background;
- (b) Describe the expert's employment and other professional history;
- (c) Identify all asbestos-related cases in which the expert has testified as an expert witness, including title and number of the case, court in which the case was pending, and the party for whom the expert testified.

ANSWER: Raymark has not yet selected any expert witnesses. Once such experts are selected, this answer will be supplemented as necessary.

73. State separately as to each expert the subject matter on which the expert is expected to testify, state the substance of the facts and opinions to which the expert is expected to testify, and set forth a summary of the grounds of each such opinion. Supplement this answer as you ascertain any additional expert witnesses.

ANSWER: See answer to Interrogatory No. 72.

74. Please state the first ten (10) personal injury suits filed against the defendant or any of defendant's predecessors-in-interest which alleged that someone suffered any adverse health effect from exposure to any asbestos-containing product manufactured or sold by defendant or any of defendant's predecessors in interest. As to each such personal injury suit, please state:

- (a) The complete caption of the complaint including Docket Number;
- (b) The state and court in which the suit was brought;
- (c) The date the suit was filed;
- (d) The diseases or impairments alleged to have been caused by exposure to an asbestos containing product;
- (e) The disposition of the suit, including whether there was any settlement or compromise of the suit, and if so, describe same in detail.

ANSWER: See answer to Interrogatory No. 46.

75. Please identify all writings which were part of the court record in each of the lawsuits stated in answer to the preceding interrogatory.

ANSWER: See answer to Interrogatory No. 46.

76. If you will do so without a separate Motion to Produce, please attach a copy of each writing identified in the preceding Interrogatory.

ANSWER: See answer to Interrogatory No. 46.

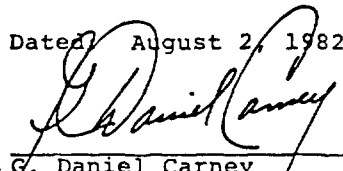
SUBMITTED BY:

BASKIN AND SEARS, P.C.

By:

Joel Persky
10th Floor, Frick Building
Pittsburgh, PA 15219
(412)562-8685

Dated August 2, 1982


G. Daniel Carney

Thorp, Reed & Armstrong
2900 Grant Building
Pittsburgh, PA 15219
412/288-7779

Counsel for Raybestos-
Manhattan, Inc.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Notice of Service of Interrogatories were served on counsel of record by first class, U. S. mail, postage prepaid, on this 19th day of June, 1982. (See attached list)

Thomas W. Henderson
Thomas W. Henderson, Esq.

RIDER NO. A

ANSWER TO INTERROGATORY NO. 1

Either William S. Simpson, Chairman of the Board, or Craig R. Smith, Vice-President, Raybestos-Manhattan, Inc., 100 Oakview Drive, Trumbull, Connecticut 06611, has signed the interrogatory answers, solely for the purpose of satisfying the verification requirement.

These interrogatory answers are based upon a review of corporate documents and information obtained from discussion with various corporate personnel and have been assembled by authorized employees and counsel of Raybestos-Manhattan, Inc. It is not possible to certify that all documents pertaining to the subject have been discovered and/or considered in connection with these responses.

RIDER NO. B

ANSWER TO INTERROGATORY NO. 2

On June 28, 1982, Raybestos-Manhattan, Inc., changed its name to Raymark Corporation. Raymark Corporation is a holding company with one wholly-owned subsidiary, Raymark Industries, Inc. All of Raybestos-Manhattan's assets are held by this subsidiary. Raybestos Manhattan, Inc., was incorporated on July 5, 1929 for the purpose of merging The Raybestos Company, Bridgeport, Connecticut, General Asbestos and Rubber Company, Charleston, Passaic, New Jersey; and United States Asbestos Company, Manheim, Pennsylvania. Raybestos-Manhattan, Inc, was reincorporated on February 25, 1976 under Connecticut laws. Its corporate charter is a matter of public record and a copy of the same can be obtained from the Secretary of the State of Connecticut upon request. Its corporate headquarters is now located at 100 Oakview Drive, Trumbull, Connecticut.

Warning labels were not deemed necessary until recently because exposure to airborne fiber levels generated by fabrication and installation of Raybestos products furnished for use by insulation mechanics was below those limits at which health effects were known to occur and below limits recommended by industrial hygiene authorities. Raybestos' asbestos products furnished for use by insulation mechanics are basically textile in nature and are composed of relatively long textile grade asbestos fiber that does not readily become airborne during normal use, fabrication and/or handling in the environment of industrial insulation mechanics. Raybestos does not believe these materials present health hazards to mechanics who use them in the course of their work. Therefore, warnings were not given prior to 1972 due to the low potential of Raybestos products for emitting respirable airborne fibers during fabrication, handling, installation, use or removal.

Since July 1972, warning labels have been placed on products where asbestos fibers are not encapsulated. This was done in accordance with the OSHA standard issued in June 1972. Since 1974, warnings have been placed on all asbestos products furnished by Raybestos which, in accordance with OSHA requirements, specifically states: CAUTION. CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING DUST MAY CAUSE SERIOUS BODILY HARM. The warning label has been on each package of each shipment from Raybestos plants since the date that the warnings first were used.

The warnings were placed on products by means of ink, stencil, pressure sensitive adhesive label, preprinted adhesive tape, preprinted packaging or wrapping material, or printed paper tags. These warnings are in regular use at each Raybestos shipping location that handles asbestos-containing products.

In addition, since sometime in 1975, Raybestos had distributed a booklet entitled "Recommended Work Practices, Use and Handling of Asbestos Textile Products" to customers of Raybestos textile products. Approximately mid-1975 Raybestos commenced distribution of work practice instructions with all friction material shipments and has also distributed an asbestos "information list" to many of its customers and other interested parties. This list contains recommended work practices and information on monitoring services and protective equipment, among other things.

In addition to warning labels on packages, printed work practice instructions have been included in all shipments of asbestos-containing friction materials since late 1975. These instructions read as follows:

IMPORTANT
ASBESTOS DUST HAZARD

- Do not breathe dust
- Do not use air hoses for cleaning
- Do not machine without dust collection equipment
- Do use vacuum or wet cleaning methods
- Do dispose of dust in sealed container
- Do wear mask if unable to avoid dust.

Customers have been apprised of the need for precautions against airborne asbestos dust hazards by means of printed bulletins from time to time since approximately January 1975.

Early in 1977 Raybestos distributed an "Environmental Package" to all of its asbestos textile customers. This package contained a copy of the work practices booklet, along with a current copy of the OSHA asbestos regulation, a summary of the results of certain laboratory tests of fiber release from asbestos fabrics conducted at McGill University, a list of suppliers of protective equipment, a list of laboratories and consultants offering asbestos dust monitoring services, and a list of suppliers of vacuum cleaners and sources of information on design and control of local exhaust systems. The "Environmental Package" was assembled by John E. Day, Jr., Director of Environmental Programs; Raybestos-Manhattan Industrial Products Co., North Charleston, S.C. 29405.

Beginning in or about October 1977, Raybestos began to provide the following notice with its asbestos products which might release airborne fiber levels in excess of OSHA limits if subject to abuse during use:

NOTICE

This asbestos product is manufactured with a dust-suppressing binder for the express purpose of locking-in fibers during normal use. Care should be used while handling all asbestos products so as to avoid abuse and excessive dust emission. For detailed information, consult the handbook "Recommended Work Practices - Use and Handling of Asbestos Textile Products," published by the Asbestos Information Association. A copy will be sent to you upon request.

Write to: Textile Group
R/M Industrial Products Company
P.O. Box 5205
North Charleston, S.C. 29405

The work practice instruction sheets were authorized by John E. Marsh, Corporate Director of Environmental Affairs, Raybestos-Manhattan, Inc., 100 Oakview Drive, Trumbull, Connecticut 06611. The booklet entitled "Recommended Work Practices-Use and Handling of Asbestos Textile Products" was obtained from the Asbestos Information Association.

The caution labels are attached directly to the outside of asbestos products packages prior to shipment from Raybestos plants. Work practice sheets are inserted inside friction materials containers prior to shipment. AIA booklets have been distributed by hand and by mail, and to the best of our knowledge no record has been kept of these distributions. The "Environmental Package" was circulated by mail to asbestos textile customers.

Aside from the aforementioned booklets, Raybestos did not provide its customers with any special instructions. Raybestos as a rule does not furnish application or installation instructions with products sold for use by insulation mechanic. Insulation procedures for these materials are believed to be so old and well-known as to constitute state of the art technique and are not published or disseminated by Raybestos.

RIDER NO. D

ANSWER TO INTERROGATORY NO. 24

Prior to 1976, Raybestos employed no chief medical officer. Dr. Hilton C. Lewinsohn was hired by John H. Marsh, Director of Environmental Affairs, in September 1976 and served as Raybestos' first Corporate Medical Director until February 1981. Lewinsohn was responsible for supervising and coordinating medical surveillance programs at all company facilities and provided professional guidance and assistance in the administration of Raybestos' corporate industrial hygiene program. He also participated in various medical and scientific programs relating to occupational health and was involved in research activities on the biological effects of asbestos.

Among the reasons that Raybestos hired a medical director was to supervise and coordinate medical surveillance programs at all Raybestos facilities and to provide professional guidance and assistance in the administration of a corporate hygiene program.

RIDER NO. E

ANSWER TO INTERROGATORY NO. 28

In September of 1977, John E. Marsh, Director of Environmental Affairs, 100 Oakview Drive, Trumbull, Connecticut, 06611, hired Raybestos' first industrial hygienist. John O. Pearson, Raybestos-Manhattan, Inc., 100 Oakview Drive, Trumbull, Connecticut, 06611, is presently employed by Raybestos in that capacity. Prior to that date, Raybestos never employed a certified industrial hygienist on its company payroll, but from time to time Raybestos used its technical personnel at various plants to perform air monitoring tests.

Raybestos-Manhattan hired Mr. Pearson to assist in the development, inauguration and coordination of its corporate industrial hygiene program. Mr. Pearson's duties are to work with and advise plant production management with respect to safe working practices and monitoring procedures and to work with the Corporate Research Laboratory, Stratford, Connecticut, to expand in-house analytical capabilities and to make industrial field surveys and provide consulting services to corporate management, plant management, ventilation contractors, design engineers and others pertaining to the effectiveness of proposed or existing systems for controlling hazardous materials in Raybestos facilities.

RIDER NO. F

ANSWER TO INTERROGATORY NO. 29 (2 pages)

In or about 1930, Raybestos arranged with the Metropolitan Insurance Company to perform industrial hygiene studies at Raybestos plants. The purpose of the study was to make recommendations for the elimination of conditions that might present health hazards. The Metropolitan studies concerned only occupational exposure in Raybestos manufacturing operations which are quite dissimilar (significantly higher levels of exposure) from conditions that occur through installation of Raybestos products sold for use by insulation mechanics. Reports on a series of studies subsequently were issued.

In 1936 Raybestos, in cooperation with several other asbestos products manufacturers, made arrangements to have a study conducted by the Trudeau Foundation at Lake Saranac, N.Y. to determine the relationship, if any, between pulmonary pathologies and asbestos dust exposure. These studies were limited to experiments with animals. The principal researcher died several years after the study was conducted which significantly delayed its publication. Results of these studies are contained in a paper entitled, "Experimental Studies of Asbestosis" by Arthur Vorwald, Thomas Durkan, and Philip Pratt. The paper was published in AMA Archives of Industrial Hygiene and Occupational Medicine, January 1951, Volume 3, pages 1-43.

In 1947 Raybestos participated in an industry study conducted by Industrial Health Foundation, Pittsburgh, Pa. under sponsorship of the Asbestos Textile Institute of Philadelphia, Pa. to determine the nature and magnitude of the asbestos/health problem in asbestos textile manufacturing operations. The scope of these studies did not extend to products or health hazards associated with their use or application. Raybestos was determined to have its processes under as good or better control at that time than any other company participating in this study. No specific recommendations were made for improvement of dust that medical surveillance programs of all participating companies be strengthened, and IHF recommended that an ongoing program of engineering control measures be implemented throughout the industry and also recommended research on new methods of dust control and further dust studies.

Raybestos also participated in fibrous dust studies conducted by Industrial Health Foundation from 1968 thru 1970 and contributed \$20,000 to these studies. To the best of its knowledge, Raybestos does not have a copy of the final report from these studies. However, copies of several progress reports exist.

In 1975, Raybestos contracted with the IAF to survey its plants and medical facilities and make recommendations for improved controls and medical surveillance programs for the benefit of Raybestos employees.

CO-110

RIDER NO. 4

ANSWER TO INTERROGATORY NO. 36.

In the 1930's, Raybestos in cooperation with other manufacturers of products containing asbestos, subsidized a research project conducted by the Trudeau Foundation, Lake Saranac, New York to determine the relationship between pulmonary pathology and asbestos dust exposure. To the best of Raybestos' knowledge it shared the \$5,000 yearly cost with other participants for approximately 5 years. In the 1960's, Raybestos contributed \$20,000 to the Industrial Health Foundation (IEF), Pittsburgh, Pennsylvania, towards a series of industrial fibrous dust studies. Raybestos has also contributed approximately \$45,000 to research studies performed at McGill University concerning the release of asbestos dust from its asbestos textile products.

Raybestos has been an industry leader in providing funds for long range research programs on the biological effects of asbestos and in establishing comprehensive medical surveillance programs for its employees. To the best of Raybestos' knowledge records do not exist to confirm the exact amounts of contributions it made toward such research.

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ANSWER TO INTERROGATORY NO. 38

Prior to 1976, Raybestos did not have a central office or department dealing with medical research. However, from September 1976 to February 1981, Raybestos employed Dr. Hilton C. Lewinsohn as its Corporate Medical Director. He was responsible for supervising and coordinating medical surveillance programs at all Raybestos facilities and provided professional guidance and assistance in the administration of a corporate industrial hygiene program. In addition, he participated in various medical and scientific programs relating to occupational health and was involved in research activities on the biological effects of asbestos both in this country and abroad.

Dr. Lewinsohn reported to John H. Marsh, Director of Environmental Affairs. Mr. Marsh is located at the Raybestos corporate headquarters in Trumbull, Conn.

Although there is no separate medical department, there are individuals who have acted in a medical advisory capacity to Raybestos in the past. Also some Raybestos plants have maintained medical departments or dispensaries. Records of dates of establishment of these facilities at various locations are not presently available. Occupational health programs by medical personnel have been conducted at each major Raybestos manufacturing facility. Programs have included pre-employment and routine periodic physical examinations, including annual chest x-rays, medical treatment of occupational injury and illness and medical record keeping. Presently, employees who work in asbestos products manufacturing areas are given medical surveillance under these programs. The details of Raybestos' current medical surveillance program are contained in Raybestos-Manhattan Industrial Products Co. Environmental Manual.

At smaller Raybestos-Manhattan facilities where full time medical personnel are not employed, medical surveillance is provided by local physicians on a fee basis.

RIDER NO. I

ANSWER TO INTERROGATORY NO. 39

For many years, Raybestos has collected miscellaneous documents, journals, articles, and books pertaining to the effects of asbestos upon human health. These materials have been gathered and maintained over the years by a number of individuals and have been in the possession of John E. Marsh, Director of Environmental Affairs, since approximately 1974.

Raybestos subscribes to the following publications, most of which from time to time contain information or articles concerning asbestos: Archives of Environmental Health, Lancet, British Medical Journal, Annals of Occupational Hygiene, Occupational Health & Safety, Medical News Digest, British Journal of Industrial Medicine, Chest, Environmental Research, American Journal of Medicine, New England Journal of Medicine, Asbestos, Journal of Occupational Medicine, Science, Toxic Material News, OSEA Compliance Letter, Federal Register, Environmental Health Letter, Occupational Health & Safety Letter, Environmental Issues, Occupational Hazards, National Safety News, American Industrial Hygiene Association Journal, Industrial Hygiene Digest, Journal of the Air Pollution Control Association, Environmental Science and Technology, Science News, Bureau of National Affairs Environmental Reporter, Bureau of National Affairs Occupational Safety & Health Reporter, Environment, and Environmental Health Letter.

ANSWER TO INTERROGATORY NO. 48 (2 pages)

Raybestos holds membership in numerous institutes, associations, and organizations. Among these are:

Air Pollution Control Association
4400 Fifth Avenue
Pittsburgh, Pa. 15213 1970 - present

American Industrial Hygiene Association
66 S. Miller Road
Akron, Ohio 44313 1974 - present

American Society for Testing & Materials
1916 Race Street
Philadelphia, Pa. 19103 1940 - present

Asbestos Information Association/North America
1835 K Street, N.W.
Washington, D.C. 20006 1970 - present

Asbestos Textile Institute
P.O.Box 471
131 N. York Road
Willow Grove, Pa. 19090 1944 - present

Automotive Parts Rebuilders Association
6849 Old Dominion Drive
McLean, Va. 22101 pre-1967 - present

Automotive Service Industries Association
230 N. Michigan Avenue
Chicago, Ill. 60601 1960 - present

Brake Lining Manufacturers Association
Dissolved in 1949 Approx. 1930 - 1949

Fluid Sealing Association
(formerly Mechanical Packing Assn.)
2017 Walnut Street 1933 - 1974
Philadelphia, Pa. 19103 Feb. 1977 - present

Friction Materials Standards Institute Inc.
Bergen Mall Office Center
E. 210 Route 4
Paramus, N.J. 07652 1949 - present

Grinding Wheel Institute
2130 Keith Building
Cleveland, Ohio 44115 1951 - 1971

Industrial Health Foundation, Inc.
(formerly Industrial Hygiene Foundation of America)
5231 Centre Avenue 1937 - 1957
Pittsburgh, Pa. 15232 1968 - present

National Association of Manufacturers
277 Park Avenue
New York, New York 10017 1915 - present

National Safety Council
Box 11171
Chicago, Ill. 60611 1936 - present

Organization Resources Counselors Inc.
1625 I Street, N.W.
Washington, D.C. 20006 1974 - present

Rubber Manufacturers Association
1901 Pennsylvania Ave., N.W.
Washington, D.C. 20006 Approx. 1930 - present

Society of the Plastic Industry Inc.
335 Lexington Avenue
New York New York 10017 1956 - present

RIDER NO. 11

ANSWER TO INTERROGATORY NO. 62

Raybestos has taken many precautions to protect the health of its employees. Raybestos conducts periodic dust monitoring to determine when safe levels are exceeded so that either corrective measures may be taken and safety precautions can be made such as requiring the use of respirators and protective clothing. Instruction is given on the use of respirators, protective clothing, changing rooms, separate lockers, and showers are provided to ensure safety. Signs are posted warning employees of areas where dust levels exceed safe levels and safety precautions are needed. Work safety rules are made known to all employees through booklets, bulletin board postings and Raybestos manuals. Adherence to work safety rules is required under penalty of disciplinary action. Annual physical check ups are provided to monitor employee health. Employees are warned by company physicians of the dangers of smoking. Lung Association booklets and copies of Asbestos Information Association's "What Every Employee Should Know About Asbestos" and "What You Should Know About Asbestos and Health" are provided to employees. Warnings appear on Raybestos non-encapsulated products and employees have safety meetings which appraise them of potential health hazards.

RIDER NO. 2

ANSWER TO INTERROGATORY NO. 65

Raybestos' asbestos insulation products are shipped by truck to specific destinations. For many years, cloth products have been wound on cardboard cores and wrapped in burlap. Since approximately 1973, the outer wrapping has been polyethylene film instead of burlap, and the film imprinted with the Raybestos logo. Tape products were wound in rolls and packed in cardboard cartons with Raybestos-Manhattan printed on the cartons. Since approximately December 1978, tape has been furnished in individual packages covered with heat-shrunk polyethylene film. A number of packages are placed in cardboard cartons for shipment.

- C18Q3

RIDER NO. M

ANSWER TO INTERROGATORY NO. 69 (4 pages)

The following is a list of Raybestos' liability coverage:

PRIMARY COVERAGES & LIMITS

U.S. Guarantee	CL5240709	9/26/51-9/26/54
Federal Insurance Co.	FL5036400	9/26/54-9/26/57
"	FL5112271	9/26/57-9/26/60
"	FL77059317	9/26/60-9/26/63
"	*FL77196574	9/26/63-9/26/66
"	*FL77358861	9/26/66-9/26/67
Employers Commercial Union	*CL216-8056-031	9/26/67-9/26/68
"	*CL216-8056-035	9/26/68-10/15/69
Zurich Insurance	*GA86-36-300	10/15/69-12/31/72
"	**GA87-05-731	12/31/72-12/31/75
"	**GA88-26-161	12/31/75-12/31/78

LIMITS: *all exposures (except Products Liability):

\$500,000/1,000,000 BI
\$500,000/500,000 PD

Products Liability:

\$1,000,000/1,000,000/1,000,000 - BI & PD separately

**All exposures:

\$1,000,000 each occurrence
\$1,000,000 aggregate (where applicable)

-17018

EXCESS COVERAGE & LIMITS

(except aircraft products)

a. Globe Indemnity	GLA100007	5/18/62-5/13/65
	*GLA500105	5/18/65-5/18/68

LIMITS: \$1,000,000/1,500,000 annual aggregate
*increased on 8/14/67 to
\$2,500,000/3,750,000 annual aggregate

b. American Home	CE35-16-33	5/18/68-5/18/71
"	BE273-08-00	5/18/71-5/18/72
"	BE273-58-96	5/18/72-5/18/73
"	BE337-95-57	5/18/73-5/18/74
"	BE351-43-71	5/18/74-5/18/75
"	BE351-87-41	5/18/75-5/18/76

LIMITS: \$5,000,000/5,000,000 annual aggregate

c. First State Insurance	92-09-08	6/20/73-5/18/74
Lumberman's	4SX010224	5/18/74-5/18/75
"	5SX010224	5/18/75-5/18/76

LIMITS: \$5,000,000/excess of \$5,000,000

d. Highlands Insurance	SR10687	6/26/75-5/18/76
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\$10,000,000 excess of \$10,000,000

e. Aetna C. & S.	OIXN816WCA	8/12/75-5/18/76
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CURRENT EXCESS PROGRAM

1. Northbrook Insurance	63-001-826	5/18/76-5/18/77
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\$5,000,000 excess of primary and self-insured retention

11/Q1B

2. First State Insurance 922343 5/13/76-5/18/77

\$5,000,000 excess of primary and Northbrook

3. Northbrook Insurance 63-001-827 5/18/76-5/18/77

\$15,000,000 excess of primary, Northbrook
and First State

4. Aetna C. & S. OIXN103WCA 5/18/76-5/18/77

\$15,000,000 excess of primary, Northbrook, First
State and Northbrook

101701c

CURRENT PRODUCT LIABILITY INSURANCE COVERAGE
(Excludes Aircraft Products)

Primary Coverage

Zurich Insurance Company
Policy #GA38-52-446
Term--12/31/76-12/31/79
\$ 1,000,000

Umbrella Coverage

North Brook Insurance Company
Policy #63-003-073
Term--5/18/77-12/31/78
\$19,000,000

First State Insurance Company
Policy #923180
Term--5/18/77-12/31/78
\$ 6,000,000

Aetna Casualty & Surety Company
Policy #01XN1351 WCA
Term--5/18/77-12/31/78
\$10,000,000

C1001D

VERIFICATION

STATE OF CONNECTICUT)

COUNTY OF FAIRFIELD)

William J. Bragg being duly sworn according to law,
upon his oath deposes and says: I am *Chairman of the Board*
of Raybestos-Manhattan, Inc., and am authorized to make this
verification on its behalf; I have read the above document and
know its contents; the facts stated in the foregoing answers to
Interrogatories propounded upon Raybestos-Manhattan, Inc., are
not within my personal knowledge; the facts stated therein have
been assembled by authorized employees of Raybestos-Manhattan,
Inc., and I am informed and believe, on that ground, that the
facts stated therein are true.

William J. Bragg

Subscribed and sworn to before me
this *11th* day of *June*, 1982.

Maryalosa
NOTARY PUBLIC

My Commission Expires April 1, 1987.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing ANSWERS TO INTERROGATORIES were served upon all counsel of record by first-class mail, postage prepaid, this 30 day of August, 1982.

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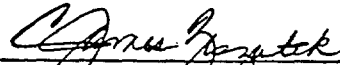
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