



NO. 87-16077-H

JO ANN MAPLES, Individually	§	IN THE DISTRICT COURT OF
and as Personal Representative	§	
of the Heirs and Estate of	§	
THOMAS D. MAPLES, Deceased,	§	
et al	§	DALLAS COUNTY, TEXAS
	§	
VS.	§	
	§	
ARMSTRONG WORLD INDUSTRIES,	§	
INC., et al	§	160TH JUDICIAL DISTRICT

DEFENDANT OWENS-CORNING FIBERGLAS CORPORATION'S
SUPPLEMENTAL RESPONSE TO
PLAINTIFFS' SECOND SET OF INTERROGATORIES

COMES NOW, OWENS CORNING FIBERGLAS CORPORATION, by counsel and makes the following Interrogatory responses.

Respectfully submitted,

BAILEY AND WILLIAMS

By: C. Edward Fowler, Jr.
C. EDWARD FOWLER, JR.
State Bar No. 07328000

3500 NCNB Plaza
901 Main Street
Dallas, Texas 75202-3714
214/939-3300
Fax #214/939-3375

Attorney for Defendant,
Owens-Corning Fiberglas Corporation

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been hand delivered to plaintiffs' counsel of record on this the 26th day of September, 1990.

C. Edward Fowler, Jr.
C. EDWARD FOWLER, JR.

JO ANN MAPLES, Individually	§	IN THE DISTRICT COURT OF
and as Personal Representative	§	
of the Heirs and Estate of	§	
THOMAS D. MAPLES, Deceased,	§	
JOE C. BEDWELL and ETHEL	§	
BEDWELL, JOSEPH W. COLLIER and	§	
CHRISTINE COLLIER, JERRELL D.	§	
BAKER and LINDA MARIE BAKER,	§	
JIMMY M. RUSHING and JULIA	§	
RUSHING	§	
	§	
Plaintiffs,	§	DALLAS COUNTY, TEXAS
	§	
Versus	§	
	§	
ARMSTRONG WORLD INDUSTRIES,	§	
INC., et al.	§	
	§	
Defendants.	§	160th JUDICIAL DISTRICT
	§	

OWENS CORNING FIBERGLAS CORPORATION'S SUPPLEMENTAL
RESPONSE TO PLAINTIFFS' SECOND SET OF INTERROGATORIES

Defendant Owens-Corning Fiberglas Corporation ("OCF"), by counsel, supplements its response to plaintiffs' Second Set of Interrogatories, as follows:

INTRODUCTORY STATEMENT AND OBJECTIONS

Plaintiffs seek information which in many instances is contained in numerous files and records. Further, certain of these interrogatories may call for the collection of information from OCF offices located in various parts of the United States. Therefore, OCF has responded on the basis of the best information now available to it. Subsequent investigation may reveal additional information relevant to these interrogatories and lead to a supplemental response. It is also noted that persons who are not now officers, directors or managing agents of OCF may

have information relevant to the subject matter of these requests, and OCF is not purporting in the following responses to be giving the response of any such persons.

OCF's responses are made without in any way waiving:

(1) the right to object on the grounds of competency, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery procedure involving or relating to the subject matter of these interrogatories.

Furthermore, to the extent that these interrogatories seek information concerning injury or disease other than those allegedly experienced by plaintiffs herein or concerning asbestos-containing products other than those to which plaintiffs allegedly were exposed, OCF objects on the grounds that such information is beyond the proper scope of discovery and is not reasonably calculated to lead to the discovery of admissible evidence. To the extent these interrogatories are not limited in time to the years that OCF manufactured and/or sold asbestos-containing products, OCF objects on the grounds that these interrogatories are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

OCF also objects to these interrogatories to the extent that they seek information which is protected from discovery as

attorney work-product, attorney-client communications, protected by the right to privacy, any other applicable privilege or material which is considered to be proprietary and trade secret.

Incorporating the above objections into each response, OCF responds as follows:

INTERROGATORY NO. 1:

For each document listed below, please answer whether such document is a true and correct duplicate of a genuine and authentic document:

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(o) K-388	Owens-Corning Fiberglas memo dated 8/2/66 to A.S. Kevlin, New York, from O.W. Pfeifer, Granville, with cc's to Edwards, Hardwick, McEvoy, Mason, Vyverberg & Wilson (2 pages)	

SUPPLEMENTAL RESPONSE NO. 1(o):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(p) K-389	Memorandum for the Record dated 11/8/66 to F.H. Edwards-Toledo, A.S. Kevlin-New York & J.F. Vyverberg-New York from Wayne Johnson-New York (1 page)
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SUPPLEMENTAL RESPONSE NO. 1(p):

OCF states that the exhibit described above cannot be located within plaintiffs' exhibits.

(q) K-390 Memo re Kaylo Research & Development
dated 11/14/66, to J.F. Vyverberg, New
York, with copy to Central Files, from
R.F. Shannon, Granville (1 page)

SUPPLEMENTAL RESPONSE NO. 1(q):

OCF states that the exhibit described above cannot be
located within plaintiffs' exhibits.

(r) K-391 Owens-Corning Fiberglas Intra-
Company Correspondence dated
11/18/66 to F.H. Edwards-Toledo
from Wayne Johnson-New York, with
cc's to Briley and Ladd (1 page)

SUPPLEMENTAL RESPONSE NO. 1(r):

OCF states that plaintiffs' exhibit as described above is a
true and correct duplicate of a genuine and authentic document
found in the files of OCF, except insofar as it contains exhibit
stickers, handwriting, marginalia and other marks which do not
appear on the original of this document.

(s) K-355 Minutes of the Health and Safety 42 103 0915-0916
Committee of NIMA dated
December 12, 1966 (2 pages)

SUPPLEMENTAL RESPONSE NO. 1(s):

OCF states that plaintiffs' exhibit as described above is a
true and correct duplicate of a genuine and authentic document
found in the files of OCF, except insofar as it contains exhibit
stickers, handwriting, marginalia and other marks which do not
appear on the original of this document.

(t) K-371 Letter dated 8/17/67 to Lewis 42-013 0931-0933
 Cralley, from Lee Grant with
 cc's to John Vyverberg with
 attachment: "Fiber Glass and
 the National Economy." (3 pages)

SUPPLEMENTAL RESPONSE NO. 1(t):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(u) K-356 Minutes of the Occupational 42 013 0934-0935
 Health and Safety Committee
 meeting of NIMA dated 10/10/67
 (2 pages)

SUPPLEMENTAL RESPONSE NO. 1(u):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(v) K-375 Memo dated 2/23/68 by R.F. Shannon
 re meeting at Johns-Manville, Manville
 New Jersey; Subject: Filger Press
 Process-Manufacture of Calcium
 Silicates (6 pages)

SUPPLEMENTAL RESPONSE NO. 1(v):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit

stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(w) K-376 Owens-Corning Fiberglas Corp. Intra-
Company Correspondence dated 3/12/68
to Grant from Hardwick re: Analysis
of Concept J-M Filter Press (9 pages)

SUPPLEMENTAL RESPONSE NO. 1(w):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(x) K-358 Minutes of the Health & Safety
Committee and Duct Systems
Committee of NIMA dated 3/13/68
(2 pages)

SUPPLEMENTAL RESPONSE NO. 1(x):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(y) K-357 Minutes of the Occupational 42 013 0938-0939
Heath & Safety Committee
meeting of NIMA dated 3/13/68
(2 pages)

SUPPLEMENTAL RESPONSE NO. 1(y):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(z) K-197 Memorandum from W.C. Taylor to 01 025 0202
 M. Hardwick re: Crocidolite
 Asbestos, dated April 10, 1968
 (1 page)

SUPPLEMENTAL RESPONSE NO. 1(z):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(aa) K-198 Memorandum from J.L. Konzen to 02 417 0002-0003
 J.H. Thomas re: The Academy of
 Sciences Working Group on Insulation
 Industrial Hygiene, dated
 May 27, 1968 (2 pages)

SUPPLEMENTAL RESPONSE NO. 1(aa):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(bb) KB-12 Kaylo & Kaylo 20 Pipe Insula- 42 012 0814-0187
tions, dated July, 1968 (4 pages)

SUPPLEMENTAL RESPONSE NO. 1(bb):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(cc) K-381 Memo for the Record dated 33 104 1344
07/03/68 re meeting on the
Health Aspects of Fibrous Glass
(1 page)

SUPPLEMENTAL RESPONSE NO. 1(cc):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(dd) K-359 INSULATION NEWSLETTER 02 401 0485-0486
published by
NIMA, August
1968, Vol. 3,
No. 2 (2 pages)

RESPONSE NO. 1(dd):

OCF objects to plaintiffs' Exhibit (dd) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. OCF also objects to plaintiffs' Exhibit (dd) on the grounds that it is incomplete.

(ee) K-360 Letter dated 8/14/68 to J.M. 02 417 0013-0014
 Briley from J.L. Konzen
 (2 pages)

RESPONSE NO. 1(ee):

OCF objects to plaintiffs' Exhibit (ee) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. Without waiving its objections, OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(ff) K-382 Owens-Corning Fiberglas Intra- 01 036 1823
 Company correspondence dated
 8/16/68 to R.S. Grant from John
 Vyverberg re Berlin-Dust
 Conditions (1 page)

SUPPLEMENTAL RESPONSE NO. 1(ff):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(gg) KB-50 Owens-Corning Fiberglas Kaylo 01 098 0208-0209
 Pipe Insulation Brochure,
 Mechanical Piping Systems 2.5,
 January, 1969 (2 pages)

SUPPLEMENTAL RESPONSE NO. 1(gg):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(hh) K-361 Minutes of the Health & Safety 42 013 0944-0947
 Committee Meeting and Duct
 Systems Committee Meeting of
 NIMA dated 1/15/69 (4 page)

SUPPLEMENTAL RESPONSE NO. 1(hh):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(ii) K-377 Owens-Corning Fiberglas Intra-
 Company Correspondence dated
 4/21/69 to Schuman from Shannon
 re Nadinsulan (2 pages)

SUPPLEMENTAL RESPONSE NO. 1(ii):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(jj) K-231 Special Hazrds Survey 42 007 0020-0024
prepared for Owens-Corning by
Aetna, subject: Industrial Hygiene
Survey, October 30, 1969 (5 pages)

SUPPLEMENTAL RESPONSE NO. 1(jj):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(kk) KB-48 Owens-Corning Fiberglas Kaylo 08 005 0496-0497
10 & Kaylo 20 Block Insulation
Brochure, Commercial D.12,
Industrial D.39, March, 1970 (2 page)

SUPPLEMENTAL RESPONSE NO. 1(kk):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(ll) K-362 Aetna Life & Casualty Co. 02 401 0450-0452
Report of Occupational Disease
Survey for Owens-Corning Fiberglas
by E.B. Engel dated April 17, 1970
(3 pages)

SUPPLEMENTAL RESPONSE NO. 1(ll):

OCF objects plaintiffs' Exhibit (ll) on that grounds that it is protected from discovery as attorney-client communications

and/or attorney work product. OCF further objects to plaintiffs' Exhibit (11) as it is incomplete.

(mm) KB-49 Owens-Corning Fiberglas Kaylo 08 005 0502-0503
10 STS Block Insulation, Pub.
No.1-1N-4274-B, June, 1970
(2 pages)

SUPPLEMENTAL RESPONSE NO. 1(mm):

OCF states that plaintiffs' exhibit as described above is a true and correct duplicate of a genuine and authentic document found in the files of OCF, except insofar as it contains exhibit stickers, handwriting, marginalia and other marks which do not appear on the original of this document.

(nn) K-363 Letter dated 7/24/70 to Jon 02 401 0438-0447
Konzen from George Clayton with
attachment: Industiral [sic] Hygiene
and Ventilation Survey, OCF, Berlin,
NJ (10 pages)

SUPPLEMENTAL RESPONSE NO. 1(nn):

OCF objects to plaintiffs' Exhibit (nn) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. OCF further objects to plaintiffs' Exhibit (nn) as it is incomplete.

INTERROGATORY NO. 2:

For each document listed below, please answer whether such document was kept and/or received and/or generated in the regular course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
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(o) K-388 Owens-Corning Fiberglas memo dated 8/2/66 to A.S. Kevlin, New York, from O.W. Pfeifer, Granville, with cc's to Edwards, Hardwick, McEvoy, Mason, Vyverberg & Wilson (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(o):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(p) K-389 Memorandum for the Record dated 11/8/66 to F.H. Edwards-Toledo, A.S. Kevlin-New York & J.F. Vyverberg-New York from Wayne Johnson-New York (1 page)

SUPPLEMENTAL RESPONSE NO. 2(p):

OCF states that the exhibit described above cannot be located within plaintiffs' exhibit.

(q) K-390 Memo re Kaylo Research & Development dated 11/14/66, to J.F. Vyverberg, New York, with copy to Central Files, from R.F. Shannon, Granville (1 page)

SUPPLEMENTAL RESPONSE NO. 2(q):

OCF states that the exhibit described above cannot be located within plaintiffs' exhibit.

(r) K-391 Owens-Corning Fiberglas Intra-Company Correspondence dated 11/18/66 to F.H. Edwards-Toledo from Wayne Johnson-New York, with cc's to Briley and Ladd (1 page)

SUPPLEMENTAL RESPONSE NO. 2(r):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(s) K-355 Minutes of the Health and Safety 42 103 0915-0916
 Committee of NIMA dated
 December 12, 1966 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(s):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(t) K-371 Letter dated 8/17/67 to Lewis 42-013 0931-0933
 Cralley, from Lee Grant with
 cc's to John Vyverberg with
 attachment: "Fiber Glass and
 the National Economy." (3 pages)

SUPPLEMENTAL RESPONSE NO. 2(t):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(u) K-356 Minutes of the Occupational 42 013 0934-0935
 Health and Safety Committee
 meeting of NIMA dated 10/10/67
 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(u):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(v) K-375 Memo dated 2/23/68 by R.F. Shannon
 re meeting at Johns-Manville, Manville
 New Jersey; Subject: Filger Press
 Process-Manufacture of Calcium
 Silicates (6 pages)

SUPPLEMENTAL RESPONSE NO. 2(v):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(w) K-376 Owens-Corning Fiberglas Corp. Intra-
 Company Correspondence dated 3/12/68
 to Grant from Hardwick re: Analysis
 of Concept J-M Filter Press (9 pages)

SUPPLEMENTAL RESPONSE NO. 2(w):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF

states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(x) K-358 Minutes of the Health & Safety
 Committee and Duct Systems
 Committee of NIMA dated 3/13/68
 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(x):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(y) K-357 Minutes of the Occupational 42 013 0938-0939
 Heath & Safety Committee
 meeting of NIMA dated 3/13/68
 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(y):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(z) K-197 Memorandum from W.C. Taylor to 01 025 0202
 M. Hardwick re: Crocidolite
 Asbestos, dated April 10, 1968
 (1 page)

SUPPLEMENTAL RESPONSE NO. 2(z):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(aa) K-198 Memorandum from J.L. Konzen to 02 417 0002-0003
J.H. Thomas re: The Academy of
Sciences Working Group on Insulation
Industrial Hygiene, dated
May 27, 1968 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(aa):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(bb) KB-12 Kaylo & Kaylo 20 Pipe Insula- 42 012 0814-0187
tions, dated July, 1968 (4 pages)

SUPPLEMENTAL RESPONSE NO. 2(bb):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(cc) K-381 Memo for the Record dated 33 104 1344
07/03/68 re meeting on the
Health Aspects of Fibrous Glass
(1 page)

SUPPLEMENTAL RESPONSE NO. 2(cc):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(dd) K-359 INSULATION NEWSLETTER 02 401 0485-0486
published by
NIMA, August
1968, Vol. 3,
No. 2 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(dd):

OCF objects to plaintiffs' Exhibit (dd) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. OCF also objects to plaintiffs' Exhibit (dd) on the grounds that it is incomplete.

(ee) K-360 Letter dated 8/14/68 to J.M. 02 417 0013-0014
Briley from J.L. Konzen
(2 pages)

SUPPLEMENTAL RESPONSE NO. 2(ee):

OCF objects plaintiffs' Exhibit (ee) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. Without waiving its objections, OCF states that the original of plaintiffs' exhibit described

above was not received, generated or kept by OCF in the regular course of a regularly conducted business activity of OCF.

(ff) K-382 Owens-Corning Fiberglas Intra- 01 036 1823
Company correspondence dated
8/16/68 to R.S. Grant from John
Vyverberg re Berlin-Dust
Conditions (1 page)

SUPPLEMENTAL RESPONSE NO. 2(ff):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(gg) KB-50 Owens-Corning Fiberglas Kaylo 01 098 0208-0209
Pipe Insulation Brochure,
Mechanical Piping Systems 2.5,
January, 1969 (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(gg):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(hh) K-361 Minutes of the Health & Safety 42 013 0944-0947
Committee Meeting and Duct
Systems Committee Meeting of
NIMA dated 1/15/69 (4 page)

SUPPLEMENTAL RESPONSE NO. 2(hh):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(ii) K-377 Owens-Corning Fiberglas Intra-
Company Correspondence dated
4/21/69 to Schuman from Shannon
re Nadinsulan (2 pages)

SUPPLEMENTAL RESPONSE NO. 2(ii):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(jj) K-231 Special Hazrds Survey 42 007 0020-0024
prepared for Owens-Corning by
Aetna, subject: Industrial Hygiene
Survey, October 30, 1969 (5 pages)

SUPPLEMENTAL RESPONSE NO. 2(jj):

OCF states that the original of plaintiffs' exhibit described above was received and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not generated by OCF in the regular course of a regularly conducted business activity of OCF.

(kk) KB-48 Owens-Corning Fiberglas Kaylo 08 005 0496-0497
10 & Kaylo 20 Block Insulation
Brochure, Commercial D.12,
Industrial D.39, March, 1970 (2 page)

SUPPLEMENTAL RESPONSE NO. 2(kk):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(ll) K-362 Aetna Life & Casualty Co. 02 401 0450-0452
Report of Occupational Disease
Survey for Owens-Corning Fiberglas
by E.B. Engel dated April 17, 1970
(3 pages)

SUPPLEMENTAL RESPONSE NO. 2(ll):

OCF objects to plaintiffs' Exhibit (ll) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. Without waiving its objections, OCF states that the original of plaintiffs' exhibit described was not received, generated or kept by OCF in the regular course of a regularly conducted business activity of OCF.

(mm) KB-49 Owens-Corning Fiberglas Kaylo 08 005 0502-0503
10 STS Block Insulation, Pub.
No.1-1N-4274-B, June, 1970
(2 pages)

SUPPLEMENTAL RESPONSE NO. 2(mm):

OCF states that the original of plaintiffs' exhibit described above was generated and kept by OCF in the regular

course of a regularly conducted business activity of OCF. OCF states that this document was not received by OCF in the regular course of a regularly conducted business activity of OCF.

(nn) K-363 Letter dated 7/24/70 to Jon 02 401 0438-0447
Konzen from George Clayton with
attachment: Industiral [sic] Hygiene
and Ventilation Survey, OCF, Berlin,
NJ (10 pages)

SUPPLEMENTAL RESPONSE NO. 2(nn):

OCF objects to plaintiffs' Exhibit (nn) on the grounds that it is protected from discovery as attorney-client communications and/or attorney work product. Without waiving its objections, OCF states that the original of plaintiffs' exhibit described above was not received, generated or kept by OCF in the regular course of a regularly conducted business activity of OCF.