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Responses to Requests for Admissions

*Hampshire's Supplemental Responses to Requests for
Admissions Abate II 11/23/93*

had no opportunity or cause to issue any such warning.

REQUEST NO. 236:

Charles Wilson occupationally inhaled asbestos-containing dust.

ANSWER TO REQUEST NO. 236:

See Answer to Request No. 221, incorporated herein by reference.

REQUEST NO. 237:

Occupational inhalation of asbestos-containing dust was a substantial contributing factor of Charles Wilson's metastatic mesothelioma.

ANSWER TO REQUEST NO. 237:

Objection. Response to this request requires expert knowledge which Hampshire does not have.

REQUEST NO. 238:

At various times between 1928 and 1984 you sold, distributed, used, installed and/or applied asbestos-containing products manufactured by the following:

- a. Johns-Manville;
- b. Raybestos-Manhattan/Raymark;
- c. H.K. Porter/Southern Asbestos;
- d. Celotex/Philip Carey;
- e. Carey Canada;
- f. National Gypsum;
- g. Pittsburgh Corning;
- h. Owens Corning Fiberglas;
- i. Owens-Illinois;
- j. Keene/Ehret/Baldwin-Hill/Baldwin-Ehret-Hill;
- k. Fibreboard;
- l. GAF/Ruberoid;
- m. Armstrong World Industries/Armstrong Cork;
- n. Flintkote;
- o. Asbestospray/Smith & Kanzler/Spraycraft;
- p. Georgia-Pacific;
- q. U.S. Gypsum;
- r. W.R. Grace;
- s. Turner & Newall;
- t. U.S. Minerals;

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- u. ASbestos Corporation Ltd.;
- v. Asbestos Unlimited;
- w. Union Carbide;
- x. Cape Asbestos;
- y. Bell Asbestos Mines;
- z. Lake Asbestos of Quebec;
- aa. Turner Brothers Asbestos;
- bb. Nicolet Industries;
- cc. Cassiar Asbestos Corp.;
- dd. ACandS/Armstrong Contracting & Supply;
- ee. T & N, Inc.
- ff. T & N plc.
- gg. Foster Wheeler Corp.
- hh. Dresser Industries, inc.
- ii. Harbison Walker Refractories Co.
- jj. Flexitallic;
- kk. Pfizer
- ll. H&A Construction Co.
- mm. Hampshire Industries, Inc./John H. Hampshire, Inc./Hampshire Corporation;
- nn. Hopeman Brothers;
- oo. MCIC/McCormick Asbestos Co.;
- pp. H.W. Porter/Reid Hayden/Porter Hayden;
- qq. Selby Battersby;
- rr. Uniroyal;
- ss. Westinghouse Electric Supply Co.
- tt. Lloyd E. Mitchell.

ANSWER TO REQUEST NO. 238:

Denied, except that Hampshire admits using asbestos containing materials manufactured by e, f, l, m, n, p, q, r, s, t, u, ee, ff, and kk.

REQUEST NO. 239:

At various times between 1929 and 1984 you sold, distributed, used, installed and/or applied asbestos-containing products manufactured by the following at Bethlehem Steel Key Highway:

- a. Johns-Manville;
- b. Raybestos-Manhattan/Raymark;
- c. H.K. Porter/Southern Asbestos;
- d. Celotex/Philip Carey;
- e. Carey Canada;
- f. National Gypsum;
- g. Pittsburgh Corning;
- h. Owens Corning Fiberglas;
- i. Owens-Illinois;
- j. Keene/Ehret/Baldwin-Hill/Baldwin-Ehret-Hill;