

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

RICHARD K. BRENNER and TERRY L. BRENNER,
as Parents and Natural Guardian of
the Estate, Goods and Chattels of
RICHARD BRENNER, III, an Infant Minor,

ESTELLE TERRELL, Individually and as
Parent and Natural Guardian of
ANTONIO FIGUEROA, an Infant Minor,

Plaintiffs,

v.

VERIFICATION OF
JAMES J. SGAMBELLONE

AMERICAN CYANAMID COMPANY, Successor
in interest to MacGREGOR LEAD COMPANY,
ATLANTIC RICHFIELD COMPANY,
EAGLE-PICHER INDUSTRIES, INC.,
LEAD INDUSTRIES ASSOCIATION, INC.,
N.L. INDUSTRIES, INC.,
SCM CORPORATION, Successor in interest
to the GLIDDEN COMPANY,
SCM CHEMICALS, INC., f/k/a
SCM PIGMENTS and GLIDDEN PIGMENTS,
THE GLIDDEN COMPANY,
THE O'BRIEN CORPORATION, d/b/a
FULLER-O'BRIEN PAINTS,
THE SHERWIN-WILLIAMS COMPANY

Defendants.

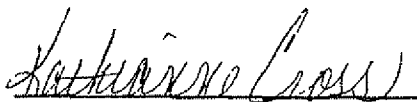
VERIFICATION

JAMES J. SGAMBELLONE, being duly sworn, deposes and
says that he is Assistant Secretary of Defendant The Sherwin-
Williams Company and that he verifies Sherwin-Williams' responses
to plaintiffs' interrogatories in this action and is duly
authorized to do so; that the matters stated in Sherwin-Williams'
responses are not within his personal knowledge and that he is
informed that there is no officer or employee of The Sherwin-

Williams Company who has personal knowledge of all such matters;
and that the responses in the foregoing document have been
assembled by authorized employees and counsel for The Sherwin-
Williams Company, and he is informed and believes that the
responses are true and correct.


James J. Sgambellone

Subscribed and sworn to me this
28 day of September, 1994.



Notary Public
KATHIANNE CROSS

Notary Public, State of Ohio, Cuy. Cty.
My Commission Expires July 14, 1998

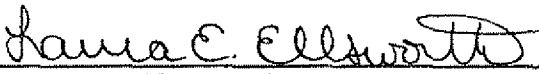
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served this 29th day of September, 1994, via United States First Class Mail, postage prepaid, upon plaintiffs' counsel:

Carl A. Green
Laraine Kelley
Michael A. Ponterio
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Eugene F. Pigott, Jr.
Camille P. Wicher
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Buffalo, NY 14202

and upon defendants' counsel as set forth on the attached list.



Laura E. Ellsworth
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January 26, 1999

FEDERAL EXPRESS

Yair S. Goldstein, Esq.
Assistant Corporation Counsel
Affirmative Litigation Division
City of New York Law Department
100 Church Street, Room 328E
New York, New York 10007

Re: City of New York v. LIA, et al.

Dear Yair:

Enclosed are the following:

1. Revised Appendix H to Defendant The Sherwin Williams Company's Supplemental Responses to Interrogatory Nos. 10, 13, 16, 19, 20 and 54 of Plaintiffs' First Set of Interrogatories to All Defendants and Interrogatory No. 1(d) and (e) of Plaintiffs' Second Set of Interrogatories to All Defendants. The appendix has been revised to show the copies of microfilm documents produced to plaintiffs.

2. Copies of supplemental documents from microfilm:

7 SWP 48501A - 48501C	System Account 1929-30;
7 SWP 48507A - 48507C	System Account 1930-31;
7 SWP 49394A - 49394C	System Account 1932-33;
7 SWP 49848A - 49848C	System Account 1934-35;
7 SWP 50036A - 50036C	System A/C 1942-43;
7 SWP 50101A - 50101B	System Account 1946-47;
7 SWP 50974A	Merchandise Packages - Spl. Lead in Oil Drums;
7 SWP 51161A - 51161B	Dry Leaded Zinc;
7 SWP 51265A - 51265B	Mdse. Pkgs. - Lead in Oil;
7 SWP 51293A - 51293B	Packing Lead in Oil;

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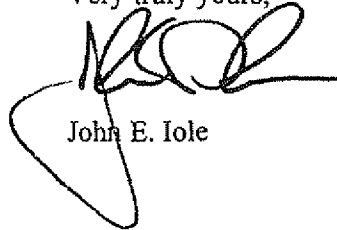
Yair S. Goldstein, Esq.
January 26, 1999
Page 2

3. Copies of three pages which previously were produced without numbers (we have assigned the number of the preceding page and an "A" suffix):

7 SWP 50600A;
7 SWP 50777A;
7 SWP 50976A; and

4. 7 SWP 51555 previously was produced as one page with two images. We are reproducing these images on two pages, 7 SWP 51555 and 7 SWP 51555A.

Very truly yours,

A handwritten signature in black ink, appearing to read "John E. Iole", with a large, sweeping loop at the bottom left.

John E. Iole

Enclosures

APPENDIX H

MICROFILM DOCUMENTS			
Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
438	OSM Smelter 1929-30	Trade Accounts Receivable	20*
438	Chicago White Lead 1929-30	Chicago White Lead Sales: Lead in Oil, ODP Soft Paste Lead, Zilo, Soft Paste Zilo and Carbonate recapitulations by date and city	*
		Accounts Receivable Trade	20*
		Production, Merchandise & Trading and Loss & Gain Account	13*
		System Account	
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account No. 3	*
		Soft Paste Lead Mfg. Acct. #1	*
		Soft Paste Lead Mfg. Acct. #2	*
		Soft Paste Lead Mfg. Account -- The Lowe Bros. Spl.	*
		Lowe Bros. Special Soft Paste Lead Mfg. account #2	*
		Zinc Lead in Oil Mfg. Acct. 1	*
		Zinc Lead in Oil Mfg. Acct. No. 2	*

* Indicates items that appear not to be directly responsive to interrogatories, but that are identified to provide additional context.

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interroga No.
		Soft Paste Zilo Mfg. #1	*
		Soft Paste Zilo Mfg. #2	*
		Manufactured Merchandise -- Carbonate	13
		Soft Paste Lead -- Lowe Bros. Spl.	*
		Manufactured ODP	13
		Zilo Manufactured Merchandise	*
		Soft Paste Zilo -- Manufactured Merchandise	*
		Soft Paste Lead -- Manufactured Merchandise	*
		Carbonate Lead	13
		Wet Carbonate	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Gross Sales	19, 20
		7-SWP-12606-12638; 12668; 12680-681	*
		7-SWP-12639-12667; 12669-679; 12682-691; 12692-724	13

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
441	Chicago White Lead 1930-31	System Account	
		O.D.P. Manufacturing Account No. 1	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfd. Account No. 3	*
		Soft Paste Lead Mfg. Acct. #1	*
		Soft Paste Lead Mfg. Account -- The Lowe Bros. Co.	*
		Spl. Soft Paste Lead Mfg. Acct.	*
		Soft Paste Lead Account #2 -- The Lowe Bros. Special	*
		Zinc Lead in Oil Mfg. Acc. 1	*
		Zinc Lead in Oil Mfg. Acct. No. 2	*
		Soft Paste Zilo Mfg. #1	*
		Soft Paste Zilo Mfg. #2	*
		Soft Paste Lead -- Manufactured Merchandise	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Zilo Manufactured Merchandise	*
		Soft Paste Zilo -- Manufactured Merchandise	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Gross Sales	20
		Chicago White Lead Sales: Lead in Oil, Soft Paste Lead, Zilo, Soft Paste Zilo, Carbonate and ODP recapitulations by date and city	20
		7-SWP-12725-12823	20
442	Chicago White Lead 1930-31	7-SWP-12824-12891	20
441	OSM Smelter 1930-31	Trade Accounts Receivable	20
442	Chicago White Lead 1930-31	Chicago White Lead Sales: Carbonate recapitulations by city	20
442	Chicago White Lead 1931-1932	System Account	
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd Acct #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Acct -- The Lowe Bros. Co.	*
		Spl. Soft Paste Lead Mfg. Acct #1	*
		Soft Paste Lead Account #2 -- The Lowe Bros. Co.	*
		Zinc Lead in Oil Mfg Account #1	*
		Zinc Lead in Oil Mfg Account #2	*
		Soft Paste Zilo Mfg Account #1	*
		Soft Paste Zilo Mfg #2	*
		Mfd Mdse -- Carbonate	13
		Mfd Mdse -- ODP	13
		Soft Paste Lead -- Mfd Mdse	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Gross Sales	20*
		Chicago White Lead Sales: Lead in Oil , ODP, Soft Paste Lead, Zilo, Soft Paste Zilo recapitulations by date and city	20*
		7-SWP-12892-12911	*
443	Chicago White Lead 1931-1932	Chicago White Lead Sales: Soft Paste Zilo and Carbonate recapitulations by date and city	20*
443	O.S.M. Smelter 1931-1932	Trade Accounts Receivable	20*
		7-SWP-12911-12942	20*
444	Chicago White Lead 1932-1933	Production, Merchandise & Trading and Loss & Gain Account	13*
		System Account	
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd Account #2	*
		Lead in Oil Mfg Account #3	*
		Soft Paste Lead Mfg Account #1	*
		Soft Paste Lead Mfg Account #2	*
		Spl. Soft Paste Lead Mfg. Account -- The Lowe Bros. Co. Chicago Ill.	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Spl. Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2 -- The Lowe Bros. Co.	*
		Spl Soft Paste Lead -- BW 102 & BW 104	*
		Spl Soft Paste Lead -- BW 102	*
		Spl Soft Paste Lead -- BW 102 & BW 104	*
		Spl Soft Paste Lead -- BW 103 & BW 105	*
		Spl Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. Account #2	*
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfd. Mdse Carbonate	13
		Mfd. Mdse Carbonate Purchased	19
		Mfd Mdse ODP	13
		Soft Paste Lead Mfd Mdse	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		B 143 - B 223 - BW 103 & BW 105 Mfd. Mdse.	*
		Spl. Pulp Lead Mfd. Mdse.	
		Zilo Mfd Mdse	*
		Soft Paste Zilo Mfd Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Merchandise Packages -- Spl. Lead in Oil Drums	*
		Suspense Account -- Dry White Lead Purchased	19
		Gross Sales	203
445	Chicago White Lead 1932-33	Chicago WL Sales: Lead in Oil, Soft Paste Lead, Zilo, Soft Paste Zilo and Carbonate recapitulations by time period and city	203
445	O.S.M. Smelter 1932-1933	Trade Accounts Receivable	203
445	Chicago White Lead 1932-33	7-SWP-12943-13042	203
446	Chicago White Lead 1933-1934	Production, Merchandise & Trading and Loss & Gain Account	13
		System Account	

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd Account #2	*
		Lead in Oil Mfd Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Mfg. Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & BW 104	*
		Spl. Soft Paste Lead -- BW 102	*
		Spl. Soft Paste Lead -- BW 102 & BW 104	*
		Spl. Soft Paste Lead -- BW 103 & BW 105	*
		Spl. Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. Account #2	
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Mfd. Mdse. Carbonate	1
		Mfd. Mdse. Carbonate Purchased	1
		Mfd. Mdse. ODP	1
		Soft Paste Lead	3
		Soft Paste Lead The Lowe Bros. Spl.	3
		Spl. Soft Paste Lead -- BW 102 & 104 Manufactured Mdse.	3
		BW 103 BW 105 Mfd. Mdse.	3
		Zilo Mfd Mdse	3
		Soft Paste Zilo Mfd. Mdse.	3
		Dry Leaded Zinc	
		Merchandise Packages Dry Lead	1
		Merchandise Packages Lead in Oil	3
		Merchandise Packages Special Lead in Oil Drums	3
		Suspense Account -- Dry White Lead Purchased	1
		Gross Sales	19,
		7-SWP-13043-044	20

0007-SWP-0072365

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro No
448	Chicago White Lead 1934-35	Production, Merchandise & Trading and Loss & Gain Account	13
		System Account	
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account The Lowe Bros. Co. Chicago, Ill.	*
		Special Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 102	*
		Special Soft Paste Lead -- BW 102 & BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Special Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zilo Zinc Lead in Oil Mfg. Account #2	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfg. Mdse Carbonate	13
		Mfd. Merchandise -- Carbonate Purchased	19
		Mfd. Mdse O.D.P.	13
		Soft Paste Lead	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Manufactured Mdse.	*
		BW 103 BW 105 Mfd Mdse	*
		Zilo Mfd Mdse	*
		Soft Paste Zilo -- Mfd Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages -- Lead in Oil	*
		Merchandise Packages Dry Lead	13
		Gross Sales	20*
		7-SWP-13045	20*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro No.
448	O.S. & M. -- Smelter 1934-35	Merchandise & Trading	20
		Trade Accounts Receivable	20
		Mfd. Mdse. Leaded Zinc Oxide	13
1799	Chicago White Lead 1935-36	System Account	
		Loss and Gain	19
		ODP Manufacturing Account #1	13
		ODP Manufacturing Account	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account #1 The Lowe Bros. Co., Chicago, Ill.	*
		Special Soft Paste Lead Mfg. Account #1	*
		Spl. Lead Mfg. Account #2 Lowe Bros.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Spl. Soft Paste Lead -- BW 102	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 103 and BW 105	*
		BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. Zilo Account #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfg. Mdse. Carbonate	13
		Mfd. Merchandise -- Carbonate Purchased	19
		Mfd. Mdse. ODP	13
		Soft Paste Lead	*
		Soft Paste Lead #1 The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Manufactured Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse	*
		Soft Paste Zilo -- Mfd. Mdse.	*

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APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Inter N
		Gross Sales	20
		Dry Leaded Zinc	:
		Merchandise Packages Dry Lead	1
		Mdse. Pkgs. -- Lead in Oil	:
1799	O.S. and M. -- Smelter 1935-36	Trade Accounts Receivable	20
		Mfd. Mdse. Leaded Zinc Oxide	1
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	:
1801	O.S. and M. -- Smelter 1936-37	Trade Accounts Receivable	:
		Mfd. Mdse. Leaded Zinc Oxide	1
		Leaded Zinc Oxide Purchased from American Zinc Sales Co.	1
		Leaded Zinc Oxide Purchased from New Jersey Zinc Co.	1
		Leaded Zinc Oxide Purchased from E.I. DuPont	1
		Leaded Zinc Oxide from Eagle Picher Co.	1
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	:
		Leaded Zinc Oxide Sales	20
		Leaded Zinc Sales	

0007-SWP-0072370

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
1802	Chicago White Lead 1936-37	Prepaid Carbonate Account	*
		Loss and Gain	19
		System Account	
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl Soft Paste Lead -- BW 102	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. A/C #2	*

0007-SWP-0072371

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogator No.
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfg. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Spl.	*
		Spl. Soft Paste lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 BW105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Purchased Dry White Lead	19
		Gross Sales	13, 20 *
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	
		Merchandise Packages -- Lead in Oil	*
		7-SWP-13046	20*

0007-SWP-0072372

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
1804	O.S. and M -- Smelter 1937-38	Trade Accounts Receivable	20*
		Dry White Lead 18 Dry	13
		Mfd. Mdse. Leaded Zinc Oxide	13
		Lead & Leaded Zinc Mfd. Mdse.	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C (Oxide in system)	*
		Sales Leaded Zinc Oxide	20*
1805	Chicago White Lead 1937-38	System A/C	
		ODP Manufacturing A/C #1	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfg. A/C #3	*
		Soft Paste Lead Mfg. A/C #1	*
		Soft Paste Lead Mfg. A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*

0007-SWP-0072373

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		Spl. Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. Zilo A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		C-50 Lead & Leaded Zinc	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Mfd. Mdse. C-50 Lead & Leaded Zinc	*
		Purchased Dry White Lead	19
		Gross Sales	20

0007-SWP-0072374

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogator No.
		Dry Leaded Zinc	*
1805	O.S. & M. Div. -- Smelter 1938-39	Trade Accounts Receivable	20*
		Dry White Lead	*
		Mfd. Mdse. Leaded Zinc Oxide	13
		Mfd. Mdse. Lead & Leaded Zinc C 50	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Sales Leaded Zinc Oxide	20*
		Sales - Lead and Leaded Zinc C 50	20*
1806	Chicago White Lead 1938-39	Untitled Account following "Plant Alteration Expense" account with "Output" column	13
		System A/C	
		Sump from System A/C	
		ODP Manufacturing A/C #1	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfg. A/C #3	*
		Soft Paste Lead Mfg. A/C #1	*
		Soft Paste Lead A/C #2	*

0007-SWP-0072375

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro No.
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead - BW 102 and BW 104	*
		Special Soft Paste Lead - BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. Zilo A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfd. Mdse. Carbonate	1
		Mfd. Mdse. -- ODP	1
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 -- BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Purchased Dry White Lead	1

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Inter N
		C-50 Lead & Leaded Zinc	
		Dry Leaded Zinc	
		Merchandise Packages Dry Lead	
		Mdse. Pkgs. -- Lead in Oil	
		Mdse. Packages Dry Lead	
		Mdse. Pkgs. -- Lead in Oil	
		Mdse. Pkgs. -- Dry Lead	
1808	OS&M Div -- Smelter 1939-40	Trade Accounts Receivable	2
		Mfd. Mdse. Leaded Zinc Oxide	
		Purchase of Leaded Zinc Oxide (from American Zinc Sales Co.)	
		Purchase of Leaded Zinc Oxide (Eagle Picher Sales Co.)	
		Mfd. Mdse. Lead & Leaded Zinc C 50	
		Leaded Zinc Oxide Sales	2
		Sales Lead & Leaded Zinc C 40 and C 50	2
1809	Chicago White Lead 1939-40	Loss & Gain	

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Chicago White Lead unnamed account containing "output" and "sales" columns	13, 2
		System A/C	
		ODP Manufacturing A/C #1	1
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfd. A/C #3	*
		Soft Paste Lead Mfg. a/c #1	*
		Soft Paste Lead A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfd. Mdse. Carbonate	1

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Mfd. Mdse. -- ODP	1
		Soft Paste Lead	3
		Soft Paste Lead A/C The Lowe Bros. Co.	3
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	3
		BW 103 -- BW 105 Mfd. Mdse.	3
		Zilo Mfd. Mdse.	3
		Soft Paste Zilo -- Mfd. Mdse.	3
		Dry Leaded Zinc	3
		Mdse. Pkgs. Dry Lead	1
		Mdse. Pkgs -- Lead in Oil	3
1810	Chicago White Lead 1940-41	System A/C	
		Mfd. Mdse. Carbonate	1
		Mfd. Mdse. -- ODP	1
		Soft Paste Lead	3
		Soft Paste Lead A/C The Lowe Bros. Co.	3
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	3

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrog No.
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Precipitated Dry White Lead	13
		Dry Leaded Zinc	*
		Mdse. Packages Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
1810	Ozark Smelting and Refining Co. Division (1940-1941)	Trade Accounts Receivable	19, 20
		Accounts Receivable -- The S-W Co.	
		Mfd. Mdse Leaded Zinc Oxide	13
		Memorandum of OPM Stock of Leaded Zinc Oxide	*
		Mfd. Mdse. Lead & Leaded Zinc C 50	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Leaded Zinc Oxide Sales	*
		Sales Lead & Leaded Zinc C 40 and C 50	20*
1813	Chicago White Lead 1941-42	Chicago White Lead unnamed account containing "output" and "sales" columns	13

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Mfd. Mdse. Carbonate Purchases	1
		System A/C	
		Sump from System A/C	
		Mfd. Mdse. Carbonate	1
		Mfd. Mdse. -- ODP	1
		Soft Paste Lead	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Mdse. Packages Dry Lead	1
		Mdse. Pkgs. -- Lead in Oil	*
1814	O.S.M. Smelter 1941-1942	Trade Accounts Receivable	20
		Mfd. Mdse. Leaded Zinc Oxide	1
		Memorandum of OPM Stock of Leaded Zinc Oxide #412	2

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Memorandum of OPM Stock of Leaded Zinc Oxide #413	*
		Memorandum of OPM Stock of Leaded Zinc Oxide #1526	*
		Sublimed White Lead for Resale	20
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Leaded Zinc Oxide Sales	20
1815	Chicago White Lead 1942-43	Chicago White Lead unnamed account containing "output" and "sales" columns	13,
		System A/C	
		Mfd. Mdse. Carbonate	1
		Mfd. Mdse. -- ODP	1
		Soft Paste Lead	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		BW 103 BW 105 Mfd. Mdse	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Mdse. Packages Dry Lead	
		Mdse. Pkgs. -- Lead in Oil	
1816	O.S.M. Smelter 1942-1943	Sales: Leaded Zinc Oxide	
		Sales: Sublimed White Lead	20
1817	O.S. & M. Div. Smelter 1943-44	Mfd. Mdse. -- Leaded Zinc Oxide	
		#412 Zinc Oxide Purchased from Amer. Zinc. Sales Co.	
		Sublimed White Lead for Resale	19
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	
		Sales -- Leaded Zinc Oxide	
		Sales #414 Oxide	
1818	Chicago White Lead 1943-1944	Chicago White Lead unnamed account containing "output" and "sales" columns	13,
		Mfd. Mdse. Carbonate Purchased	
		Mfd. Mdse. -- Carbonate	
		Mfd. Mdse. -- ODP	
		System A/C	

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Inter N
		Soft Paste Lead	
		Special Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	
		Soft Paste Lead Account -- Lowe Bros.	
		BW 103, BW 105 -- Mfd. Mdse.	
		Zilo Mfd. Mdse.	
		Soft Paste Zilo -- Mfd. Mdse.	
		Dry Leaded Zinc	
		Dry Leaded Zinc (Trail Fume)	
		Mdse. Pkgs. -- Dry Lead	
		Mdse. Pkgs. -- Lead in Oil	
1819	O.S.M. Smelter 1944-1945	Mfd. Mdse. -- Leaded Zinc Oxide	
		Mfd. Mdse. -- #414 Oxide	
		#412 Zinc Oxide Purchased from Amer. Zinc Sales Co.	
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	
		Sales -- Leaded Zinc Oxide	2
		Sales -- #414 Oxide	2

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		#414 Oxide	*
1820	Chicago White Lead 1944-45	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 2
		Duty -- Canadian Lead	2
		Mfd. Mdse. -- Carbonate	1
		Mfd. Mdse. -- ODP	1
		System A/C	
		Soft Paste Lead	*
		Special Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		Soft Paste Lead Account - Lowe Bros.	
		BW 103 BW 105 -- Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc (412-413)	*
		Dry Leaded Zinc (Trail Fume #414)	*
		Mdse. Pkgs. Lead in Oil & Dry	1
		Mdse. Pkgs. -- Dry Lead	1
		Mdse. Pkgs. -- Lead in Oil	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro N
		Precipitated White Lead	1
		Packing Lead in Oil	*
1820	Chicago White Lead 1945-46	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 2
		Carbonate for Canada	2
		White Lead Processing Carter White Lead Co. -- Canada	2
		Mfd Mdse -- Carbonate	1
		Mfd. Mdse -- ODP	1
		Soft Paste Lead	*
		Special Soft Paste Lead -- BW102 and 104 - 103-152 Mfd Mdse	*
		Soft Paste Zilo -- Mfd Mdse	*
		White Lead Processing	
		National Lead -- Canada	2
		System Account	
		Dry Leaded Zinc (412-413)	*
		Dry Leaded Zinc (Trail Fume #414)	*
		Mdse. Pkgs. -- Dry Lead	1

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro No.
		Mdse. Pkgs. -- Lead in Oil	*
		Precipitated White Lead	13
		Packing Lead in Oil	*
1822	O.S. & M. Div. Smelter 1945-46	Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	*
		Sales -- #414 Oxide	*
1823	O.S.M. Smelter 1946-1947	Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20
		Sales -- #414 Oxide	20
1824	Chicago White Lead 1946-47	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 2
		Duty -- Canadian Lead	20
		System Account	
		Dry Leaded Zinc (Trail Fume (414))	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interro No.
		Mdse. Pkgs. - Dry Lead & Lead in Oil	1
		Mdse. Pkgs. (Lowe Bros. Returned Goods)	
		Packing Lead in Oil	*
1824	OS&M Div Smelter 1947-48	Trade Accounts Receivable	20
		Mfd. Mdse. -- Leaded Zinc Oxide	1
		Mfd. Mdse. -- #414 Oxide	1
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20
		Sales -- #414 Oxide	20
1824	Lead Processing 1946-1947	National Lead Processing: Carbonate Manufacturing	*
		National Lead Processing: Mdse. Pkgs. Dry Lead & Lead in Oil accounts by city	*
		7-SWP-13054-055; 13058; 13065-066; 13068; 13074; 13076	*
1825	Lead Processing 1947-48	Accounts for Chicago, Philadelphia, Perth Amboy, Brooklyn, St. Louis and San Francisco: Soft Paste Lead in Oil -- Rx 17, Carbo Manufacturing, Mdse. Pkgs. -- Dry Lead in Oil, Soft Paste Oil - - Rx 17	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interroga No.
		7-SWP-13104; 13106-108; 13110; 13114-13124; 13129-132; 13143-146; 13148-149; 13152-13155; 13161-162; 13164-167; 13170-174; 13176; 13179	*
1827	Coffeyville--Smelter 1948-49	Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20*
		Sales -- #414 Oxide	20*
		Sales Freight -- Leaded Zinc Oxide #412	20*
		Sales Freight -- Leaded Zinc Oxide #414	20*
1827	Lead Processing 1948-1949	National Lead Lead Product Manufacturing Accounts for Soft Paste Lead Rx 17, Carbonate, Mdse. Pkgs. Dry Lead and Lead in Oil	*
		7-SWP-13180-13190; 13201; 13204-214; 13217; 13222; 13226-13233; 13244	*

0007-SWP-0072389

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE CITY OF NEW YORK, et al.,	:	Index No. 14365/89
Plaintiffs,	:	IAS Part 39
- against -	:	(Justice Freedman)
LEAD INDUSTRIES ASSOCIATION, INC., et al.,	:	
Defendants.	:	
	:	
	:	

**THE SHERWIN-WILLIAMS COMPANY'S SUPPLEMENTAL
AND AMENDED RESPONSES
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES NOS. 9 AND 19**

The Sherwin-Williams Company provides supplemental amended responses to Plaintiffs' First Set of Interrogatories, Nos. 9 and 19. Sherwin-Williams' prior responses and objections to these interrogatories are incorporated by reference and are not waived by these supplemental responses. The supplemental responses are based on information compiled from a review of Sherwin-Williams' available paint formula cards, generally limited to paints for residential surfaces. Since the paint formula cards are 30 to 70 years old, the formula cards are not complete, only fragmented information is still available today, and the accuracy of the information on the formula cards cannot be verified. The information provided is taken directly as written on the formula cards, so that it may in some instances be ambiguous and subject to further interpretation. The existence of a formula card does not mean that a paint formula was actually produced and marketed during any particular point in time. There typically was a

period of time after a paint formula was no longer produced before a paint formula was voided, and some formulas were created only for emergency or stand-by use. Information is provided for all paints that contained a white lead pigment and that might have been used for interior or exterior residential purposes. Sherwin-Williams has erred on the side of including those paints for which the possible uses were not clear; therefore, some paints not intended for residential use might be included among the information provided in the supplemental interrogatory answers.

SUPPLEMENTAL AND AMENDED RESPONSES

Interrogatory No. 9

Did defendant or any of its predecessors ever produce paints containing lead for use in or on dwellings and other buildings occupied by children? If so, please state the inclusive years in which such paints were produced, and for each paint, state:

- a. the manufacturer and the brand or trade name of the paint;
- b. the purposes for which the paint was intended to be used; and
- c. the highest supervisory employee with the most knowledge concerning the production of said paints.

Supplemental and Amended Response to Interrogatory No. 9:

- a. See the chart attached as Exhibit A. **Bold-faced text indicates supplementation and amendment.**
- b. See the chart attached as Exhibit A. **Bold-faced text indicates supplementation and amendment.**
- c. Unknown. A person with knowledge of the information contained on the formula cards is Stephan Turnbull, a current employee of The Sherwin-Williams Company.

Interrogatory No. 19

Did defendant ever purchase or obtain lead pigments from any other persons? If so, identify all such persons, the years for those transactions, the volume and type of each lead pigment purchased or obtained and all documents used to answer this interrogatory.

Supplemental Response to Interrogatory No. 19:

In the chart attached as Exhibit B, Sherwin-Williams is providing information from available raw material cards. The raw material cards are 28 to 45 years old, are not complete and only fragmented information is still available today. The accuracy of the information cannot be verified. The information provided is taken directly as written on the cards, so that it may in some instances be ambiguous and subject to further interpretation.

It is believed that the existence of a raw material card does not necessarily mean that the raw material was actually used during any particular point in time, or ever was used in a product that was made or sold. If used, the use of a raw material could have ceased before the raw material card was formally voided, or could cease without being formally voided. It appears that some raw materials were used only on a stand-by or experimental basis. Information is provided for all white lead pigments that might have been used for residential purposes, even though some raw materials may not actually have been used for such purposes. In some cases, the raw material cards indicate possible uses for the raw material. It is believed that such uses were potential uses but not necessarily actual uses.

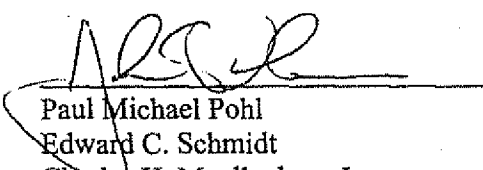
In some cases, the raw material cards indicate the name of possible suppliers. It is believed that such suppliers were potential sources of supply for the raw material. It is

believed that the presence of such a name does not necessarily indicate actual supply, the amount of supply, or the time period of supply.

Dated: October 14, 1998
Pittsburgh, Pennsylvania

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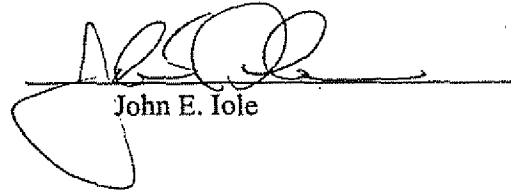
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CERTIFICATE OF SERVICE

I hereby certify that, on October 14, 1998, I served true and correct copies of the within Supplemental and Amended Responses To Plaintiffs' First Set Of Interrogatories Nos. 9 and 19 by first-class mail, postage pre-paid, on the counsel on the attached list.



John E. Iole

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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EXHIBIT A

**SUPPLEMENTAL AND AMENDED LIST OF
RESIDENTIAL PAINTS WITH ANY AMOUNT OF WHITE LEAD PIGMENT ¹**

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
AVM*	2-1	Medium Vermilion in Oil for Fountain City Novelty Company	412	22	6/2 3/1
B-1*	7-5	Rustic Shingle Stain, light green	412	3	4/6 5/2
A2AAH	1A1	SWP, gray "sedge green" for Chattanooga Housing Authority	6829	345	3-2
A2AAH	1	SWP, gray "sedge green" for Chattanooga Housing Authority	6829	345	6-1
8	3 4	American White	412D 412D	535 535	5/1 3/1
9	3 4	P.C.P. White	412D	238	3/2 9/2
ML-12	1	Metalife Gray	412	458	8/2
A2W4	9Y1	SWP, gloss white	682900	345	7-1
A2W4	9C1	SWP, gloss white	682900	345	5-2
A2W4	8N2	SWP, gloss white	682900	345	5-2

¹ The information in this chart was compiled from a review of available formula cards. Because the formula cards are 30 to 70 years old, the formula cards still in existence are incomplete today, and the accuracy of the formula cards cannot be verified. The existence of a formula card does not mean that a paint was produced and sold during any particular time. The information written on the formula cards, which in some instances may be ambiguous or subject to further interpretation.

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
BS60*	3	Brick and Stucco, white for T/G	412	500	7/2
BS60*	2 Alt A-2 2 Alt A	Brick and Stucco, white for T/G	412	760	4/4 11/6 11/7
BS60*	1 Alt A	Brick and Stucco, white	412 18	380 134	11/6
BS61*	1	Brick and Stucco Paint, ivory	412	760	12/2
69	27	Porch and deck paint, dark gray	412	500	9/2
69	25	Porch and deck paint, dark gray	413 414 BW103	500 440 77	2/1 7/3
69	16 17	Porch and deck paint, dark gray	413 or 1526 414 BW102	500 440 68	2/1 9/1
69	10 13 16A	Porch and deck paint, dark gray	1526 1526 or 413 BW102	500 500 233	11/7 8/2 9/1
71	1	Porch and deck paint, dark brown for S.W. Company	1526	92	7/1 1/6
BS74*	1	Brick and Stucco, cream	412 or 511	760 296	11/6
114	3	Galvatex	412	800	3/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
114	2-1	Galvatex	511 or 412	490 800	3/1 3/1
114	1 Alt A	Galvatex	511	490	9/2
184	5	Exterior paste paint #84, white	Parallel to 466		6/1
184	4	Exterior paste paint #84, white	414W 18	450 100	05/
184	1	Exterior paste paint #84, white	414	525	7/2
299	6	Family Paint, light lead	411B or 1526	490	7/1
	7 (temporary formula)		411B or 1526	490	2/2
300	25	Family Paint, outside, white	412	150	9/2
300	16	Family Paint, outside, white	1526	150	7/2
	20 21		1526	110	(6/17/43) s dur 8/3
300	11 13	Family Paint, outside, white	511 412	200 102	4/ 2/1
300	9 Alt A 9	Family Paint, outside, white	106 412D	330 200	11/ 11/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
301*	2-1	Sultana House Paint, light green	412	285	5/11 12/1
301*	2 Alt A	Sultana House Paint, light green	1411 18	247 38	10/1
304*	8-7	Sultana House Paint, pea green	18	76	4/2 3/2
300	6	Family Paint, yellow	1526	150	2/26/36 11/
	5		1526	150	
305*	1	Sultana House Paint, light brown	412	85	12/0
307*	18-17	Sultana Paint, medium gray	412	285	5/1 12/1
307*	16	Sultana Paint, medium gray	412	142	2/3
307*	15	Sultana Paint, medium gray	412, 511 or 414	142 71	4/5
307*	15 Alt A	Sultana Paint, medium gray	412	142	9/1
307*	14	Sultana Paint, medium gray	412 or 511	94 47	1/5
307*	13	Sultana Paint, medium gray	412 18	94 57	4/2
307*	11	Sultana Paint, medium gray	413 18	94 57	10/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.*	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
307*	9-7	Sultana Paint, medium gray	18	79	1/20/ 3/23
307*	8 Alt A	Sultana Paint, medium gray	1411 18	847 38	10/25
307	5 8	Family Paint, french gray	411 B or 1526 411 B or 1526	490 490	7/12/ 6/9/
310	5 6 7	Family Paint, dark blue	1526	115	11/1/ 2/26/ 12/30
317*	7-6	Sultana House Paint, light salmon	18	76	4/24/ 3/23
317	6	Family Paint, cream	414, BW102	435, 70	7/08
317	4	Family Paint, cream	1526 (later changed to 414)	495	6/9/
317	3 5 (apparently corrected and replaced on 11/7/41) 5	Family Paint, cream	1526 414, BW102 414, BW102	495 350, 170 435, 70	10/10/ 10/30/ 11/7/
317	2	Family Paint, cream	412 (later changed to 1526) (6/13/39)	495	11/14
319*	22-21	Sultana House Paint, light green	6829 902C	288 15	1/29/ 8/14
319*	20	Sultana House Paint, light green	68C6 902C	288 15	1/31

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
319*	19-18	Sultana House Paint, light green	412	288	1/2 11/2
319*	17	Sultana House Paint, light green	412	285	5/1
319*	17 Alt A	Sultana House Paint, light green	1411 18	247 38	10/1
319*	16	Sultana House Paint, light green	18	34	2/1
319*	15	Sultana House Paint, light green	412	142	2/3
319*	14 Alt A	Sultana House Paint, light green	412	142	9-1
319*	13	Sultana House Paint, light green	18	79	6-2
319*	12-8	Sultana House Paint, light green	18	62	1/2
319	4 (temporary formula) 4 5	Family Paint, silver gray	411B or 1526 411B or 1526 1526 (later changed to 414) or 411B	490 490 490	2/2 10/1 6/5
319	3 5 Alt A 6 (apparently corrected and replaced on 11/7/41) 6	Family Paint, silver gray	411B or 1526 1526 414 BW102 414 BW102	490 390 346 168 432 68	7/1 10/1 10/3 11/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
320	6	Family Paint, light ivory	414	346	10/3
	6		BW102 (1140)	168	
	7		414	432	11/
			BW102	68	
			414	432	7/8
			BW102	68	
320	2	Family Paint, light ivory	1526	490	11/1
	5 Alt A		1526/414	390	10/
321*	2-1	Sultana House Paint, brown	412	58	10/1
					3/2
321*	14	Sultana House Paint, brown	412	95	5/1
321*	13 Alt A 13	Sultana House Paint, brown	412	95	2/2
321*	12 Alt A	Sultana House Paint, brown	412 or 414	95	9/1
321	5	Family paint, sky blue	1526	210	11/
	8		414	210	10/2
323	5	Family paint, buff	1526	195	11/
	7		1526/414	195	6/5
324	7	Family paint, ash gray	411B or 1526	490	2/2
	6				7/1
325	6	Family Paint, straw	1526	490	11/
325	10	Family Paint, straw	414	346	10/2
			BW102	168	

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
325	10 (duplicate 11) 11	Family Paint, straw	414 BW102 414 BW102	432 68 432 68	11/7/41
326	3 4	Family Paint, green	1526 1526 (later changed to 414) (10/27/41)	430 430	4/5/41 6/5/41
326	5 (duplicate)	Family Paint, green	414 BW102	380 58	11/7/41
326	6 Alt A	Family Paint, green	414 BW102	270 46	8/2/41
326	6	Family Paint, green	see 5 duplicate	380 58	7/8/41
326	2 5 (apparently corrected and replaced on 11/7/41)	Family Paint, green	411B or 1526 414 BW102	430 304 147	7/8/41 10/2/41
327	11 10	Family Paint, pea green	1526 (later changed to 18 or 1140) (3/7/46) 414 BW 102	490 (later changed to 125) 432 68	1/1/41 7/8/41
327	9 (apparently corrected and replaced on 11/7/41)	Family Paint, pea green	414 BW102	346 168	10/2/41

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
327	9 (duplicate)	Family Paint, pea green	414 BW102	432 68	11/7
327	6 (temporary formula) 6 7 8	Family Paint, pea green	1526 1526 1526 1526 (later changed to 414)	490 490 490 490	2/2 11/8 10/1 6/9
327	5 8 Alt A 8 Alt B	Family Paint, pea green	1526 1526/414 1526/414	490 390 390	11/7 10/7 9/2
335	3	P.C.P. #13 Olive Green	1526	220	11/2
337	3	P.C.P. Shade #7 Gray	1526	230	11/2
344*	10-8	Sultana House Paint, fawn	18	39	1/2 3/2
350*	15	Sultana House Paint, ceiling blue	412 or 511	142 71	4/6
350*	15 Alt A	Sultana House Paint, ceiling blue	412	142	9/1
350*	14	Sultana House Paint, ceiling blue	412 or 511 18	94 47 57	1/9
350*	13	Sultana House Paint, ceiling blue	412 18	94 57	4/2
350*	12	Sultana House Paint, ceiling blue	413 18	94 57	10/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
350	6 8	SWP #350 Flat White	412 1526	1090 500	11/1 1/1
350	7	SWP, #350, Flat White	412 (later changed to 1526) (10/4/39)	1090	6/6
350	9	SWP Flat White	1526	500	8/5
350*	2	Sultana House Paint, ceiling blue	412	150	6/1
350*	1	Sultana House Paint, ceiling blue	412	110	3/2
351	9	SWP, #351, stone	1526	650	9/2
351	9N (Newark only) 10 11	SWP, #351, stone	1526 1526 1526	650 720 638	3/2 3/2 6/6
352	1	SWP, #352, geneva cream	412 BW102	438 113	4/1
353	21	SWP, #353, light lead	414 BW102	400 225	2/1
353	20	SWP, #353, light lead	1526 BW102-58	490 93	11/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
353	20 Alt B	SWP, #353, light lead	414 BW102	402 628	10/2
353	20 Alt A	SWP, #353, light lead	1526 BW102	570 432	10/2
353	19	SWP, #353, light lead	1526 BW102	420 607	9/2
353	17	SWP, #353, light lead	1526 BW102	490 92	5/2
353	13	SWP, #353, light lead	1526 BW104	490 92	10/2
353	12	SWP, #353, light lead	1526 BW104	678 238	5/2
353	11	SWP, #353, light lead	1526 412 BW104	238 406 278	5/3
353	10	SWP, #353, light lead	1526 412 BW102/104	256 480 400	3/1
353	9N (Newark only)	SWP, #353, light lead	1526 1140 or BW104	650 170 or 197	3/2 5/1
354	10 N (Newark) 11	SWP, #354, sea green	1526 1526 412 BW102/104	650 256 480 400	3/2 3/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
355	11	SWP, #355, sage green	1526 BW102/103 or 104	720 250	3/2
355	10 (Newark)	SWP, #355, sage green	1526 and BW104 or 1526 1140	565 155 565 135	3/2 7/1
357	22	SWP, #357, silver gray	414 BW102	400 225	1/1
357	21 Alt A 21	SWP, #357, silver gray	1526 BW102 1526 BW102	570 410 490 93	10/2 11/4
357	20 Alt A 21 Alt B	SWP, #357, silver gray	BW102 BW102	792 604	9/2 10/2
357	20	SWP, #357, silver gray	1526 BW102	420 585	9/2
357	19	SWP, #357, silver gray	1526 BW102	490 93	7/2
357	14	SWP, #357, silver gray	1526 BW104	490 92	10/
357	13	SWP, #357, silver gray	1526 BW104	678 238	5/2
357	12	SWP, #357, silver gray	1526 412 BW104	238 406 278	5/3

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
357	11	SWP, #357, silver gray	1526 412 BW102/104	256 480 400	3/1
357	10 N (Newark) 10	SWP, #357, silver gray	1526 BW104 1526 1140	225 305 226 260	3/2 5/1
359	1	SWP, #359, berkely yellow	412 BW102	438 113	4/1
360	19 20	SWP, #360, cream gray	413 or 412	440	10/2
360	12 16	SWP, #360, cream gray	1526 BW104	490 92	10/ 5/2
360	11 Alt A.	SWP, #360, cream gray	413 BW104	590 280	6/2
360	11	SWP, #360, cream gray	1526 BW104	638 224	6/6
360	10	SWP, #360, cream gray	1526 BW102/(104)	720 224	3/2
360	9N (Newark) 9	SWP, #360, cream gray	1526 BW 104 or 1526 1140	650 197 650 170	3/2 5/1
360*	4	Sultana Paint, outside white	412	100 23	5/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
360*	4 Alt A	Sultana Paint, outside white	1411 18	87 13	10/
360*	2	Sultana Paint, outside white	412	150	2/
360*	1	Sultana Paint, outside white	412	150	4/
362	14 Alt A	SWP, #362, French crown green	412	50	1/
362	13 Alt A	SWP, #362, French crown green	412 or 414	112	3/
362	11	SWP, #362, French crown green	1415 (zinc oxide) or 414 or 1085	25	11/
362	10	SWP, #362, French crown green	412 only if 1085 unavailable	25	8/
363	29	SWP, #363, slate	412 BW102	400 82	4/1
363	28 Alt A	SWP, #363, slate	412 BW102	450 82	2/
363	28	SWP, #363, slate	412 BW102	480 82	2/
363	27	SWP, #363, slate	412 or BW102 414 and 511(ZnO) BW102	380 113 190 (190) 113	9/2
363	26	SWP, #363, slate	414 BW102	305 220	6/2
363	25	SWP, #363, slate	413 BW102	410 100	4/

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
363	24 Alt B	SWP, #363, slate	413 BW102 1526 BW102	410 99 445 58	12/2
363	24 Alt A	SWP, #363, slate	413 BW102	438 113	10/
363	24 Alt C	SWP, #363, slate	413 BW102	570 432	1/2
363	24	SWP, #363, slate	1526 BW102	475 70	7/2
363	23	SWP, #363, slate	1526 BW102	475 70	5/4
363	22	SWP, #363, slate	414 W BW102	370 170	3/
363	20	SWP, #363, slate	414 BW102	400 225	2/1
363	19 Alt B	SWP, #363, slate	414 BW102	402 628	10/
363	19 Alt A	SWP, #363, slate	1526 BW102	570 432	10/
363	18 Alt A	SWP, #363, slate	BW102	815	9/2
363	19	SWP, #363, slate	1526 BW102	490 93	11/

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
363	18	SWP, #363, slate	1526 BW102	420 607	9/2
363	16	SWP, #363, slate	1526 BW102	490 92	5/7
363	12	SWP, #363, slate	1526 BW104	490 92	10/
363	11	SWP, #363, slate	1526 BW104	638 224	6/6
363	10	SWP, #363, slate	1526 BW102 (BW104)	720 224	3/2
363	9 N and 9 9	SWP, #363, slate	1526 BW104 1526 1140	650 197 650 170	3/2 5/16
363*	1	Gibbsboro House Paint, pearl blue	412	110	3/2
367	10 12	SWP, #367, red	1415/412	25	1/4 3/2
367	8 10	SWP, #367, red	1415 (412)	25	10/1 1/4
369	13 Alt A	SWP, light blue	1526 414	375 375	10/2
369	10	SWP, light blue	1526	750	10/

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
369	9	SWP, light blue	1526 412	450 300	7/7
370	1	SWP, chelsea gray	412 BW102	438 113	4/3
371	1	SWP, charleston white	414W BW102	400 295	2/1
374	1	SWP, westchester gray	412 BW102	380 113	4/1
375	28	SWP, colonial yellow	414 BW102	390 220	6/2
375	26	SWP, colonial yellow	1526 BW102	475 70	5/4
375	25	SWP, colonial yellow	414W BW102	370 170	3/5
375	23	SWP, colonial yellow	414W BW102	400 225	1/1
375	22 Alt A	SWP, colonial yellow	1526 BW102	570 410	10/2
375	22	SWP, colonial yellow	1526 BW102	490 93	11/1
375	21	SWP, colonial yellow	1526 BW102	420 585	9/2
375	21 Alt A	SWP, colonial yellow	BW102	792	9/2

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
375	21 Alt B	SWP, colonial yellow	414 BW102	403 604	Emergency 10/2
375	15 19	SWP, colonial yellow	1526 BW104/BW102	490 92	10/1 5/7
375	14	SWP, colonial yellow	1526 BW104	678 238	5/2
375	13	SWP, colonial yellow	1526 412	238 406	5/3
375	12	SWP, colonial yellow	1526 412 BW102 (104)	256 480 400	3/2
375	11	SWP, colonial yellow	1526 BW104	700 270	10/3
375	11 N and 11 duplicate	SWP, colonial yellow	1526 1140	700 230	5/1
379*	18-17	Sultana House Paint, deep cream	412	287	5/1 9/4 12/1
379*	10-8	Sultana House Paint, deep cream	18	79	1/2 3/2
379*	18 Alt A	Sultana House Paint, deep cream	1411 18	247 38	10/1
379*	16	Sultana House Paint, deep cream	412	142	2/3

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
379*	15	Sultana House Paint, deep cream	412 or 511	142 71	4/0
379*	15 Alt A	Sultana House Paint, deep cream	412 4230	142 20	9/1
379*	14	Sultana House Paint, deep cream	412 or 511 18	94 47 57	1/0
379*	13	Sultana House Paint, deep cream	412 18	94 57	4/2
379*	12	Sultana House Paint, deep cream	413 18	94 57	10/1
379	1	SWP, cape cod green	412	650	4/1
380	1	SWP, manor brown	412	80	4/1
383*	19-18	Sultana House Paint, ivory	412	285	5/14 12/1
383*	9-7	Sultana House Paint, ivory (Dura-mix)	18	88	1/2 3/2
383*	5-2	Sultana House Paint, ivory	412	150	8/1 10/1
383	21	SWP, #383, pea green	412 (6840) 1424 (6822)	275 150	1/6
383	20	SWP, #383, pea green	412 1424	275 150	7/2
383*	19 Alt A	Sultana Paint, ivory	1411 18	247 38	10/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
383*	17	Sultana Paint, ivory	412	142	2/3
383	17	SWP, #383, pea green	1425 or 1424	254	7/2
	18		1424	254	8/1
			6845	163	
383*	16	Sultana Paint, ivory	18	88	7/2
			4230	16	
383*	16 Alt A	Sultana Paint, ivory	412	142	9/1
383*	15	Sultana Paint, ivory	18	88	4/5
383*	14	Sultana Paint, ivory	412 or 511	142 71	4/6
383*	13	Sultana Paint, ivory	412 or 511	94 47	1/9
			18	57	
383	12	SWP, #383, pea green	1526 or 412 or 413	600	1/7
383*	12	Sultana Paint, ivory	18	57	4/2
			412	94	
383*	11	Sultana Paint, ivory	413	94	10/1
			18	57	
383	7	SWP, #383, pea green	1526	525	9/2
383	7N	SWP, #383, pea green	1526	525	3/2
	8		1526	550	1/1
	11		1526	600	7/2
383*	1	Sultana Paint, ivory	412(E)	114	3/2

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
384*	19-18	Sultana Paint, buff	412 12310	285 15	5/10
384*	10-8	Sultana Paint, buff	18	76	1/2 3/2
384*	19 Alt A	Sultana Paint, buff	1411 18	247 38	10/1
384*	17	Sultana Paint, buff	412	142	12/
384*	16	Sultana Paint, buff	18	88	12/2
384*	16 Alt A	Sultana Paint, buff	412	142	9/1
384*	15	Sultana Paint, buff	412 or 511	142 71	4/6
384*	14	Sultana Paint, buff	412 or 511 18	94 47 57	1/9
384*	13	Sultana Paint, buff	412 18	94 57	4/2
384*	11	Sultana Paint, buff	413 18	94 57	10/1
385	18	SWP, #385, straw	1526 BW102	478 91	7/2
385	13	SWP, #385, straw	1526	478	1/5

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
385	12	SWP, #385, straw	1526	638	6/8
385	10	SWP, #385, straw	1526	720	4/2
385	9 N	SWP, #385, straw	1526	605	2/2
386*	1	Sultana Paint, turquoise	6829	285	5/2
387	24	SWP, #387, canary yellow	1526 BW102	475 70	5/4
387	23	SWP, #387, canary yellow	414 BW102	370 170	3/5
387	21	SWP, #387, canary yellow	414W BW102	400 225	1/1
387	20	SWP, #387, canary yellow	BW102 1526	93 490	11/
387	19	SWP, #387, canary yellow	1526 BW102	420 585	9/2
387	13	SWP, #387, canary yellow	1526	490	10/
387	12	SWP, #387, canary yellow	412 or (413)	662	6/1
387	11	SWP, #387, canary yellow	1526 412 BW102	256 480 400	3/1
387	10 N	SWP, #387, canary yellow	412D	725	3/2

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
388	9	SWP, #388, modern brown	1085 (ZnO only 412 if 1085 not available)	25	8/8
	10		1415 or (1085 or 414)	25	11/2
388	6	SWP, #388, modern brown	1415/412	25	11/
	8				9/2
388*	1	Sultana House Paint, Nile green	412(E)	114	3/2
391	9	SWP, #391, Quaker drab	1526	720	3/2
391	8 N (Newark only)	SWP, #391, Quaker drab	1526	600	3/2
392*	7	Dura-Mix House Paint, French gray	18	44	1/1
393	17 Alt B	SWP, #393, tobacco brown	412	25	6/7
393	15	SWP, #393, tobacco brown	414	60	11/2
	16		1526 or 413	60	7/1
	17		1526 or 413	60	2/8
393	11	SWP, #393, tobacco brown	1526	140	6/3
	12		1526 (414)	130	9/2
	13		414	80	5/5
393	9	SWP, #393, tobacco brown	1526	100	11/
	10		1526	114	1/2
394	8 N (Newark only)	SWP, #394, primrose yellow	1526	720	3/2
	10		1526	638	6/6
	12		412	330	7/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
396*	10-8	Sultana Paint, azure	18	85	1/20 3/22
396*	7-3	Sultana Paint, azure	412	145	8/12 5/3
396*	14	Sultana Paint, azure	412	285	5/11
396*	13	Sultana Paint, azure	18	35	5/11
396*	12	Sultana Paint, azure	412	142	2/11
396*	2	Sultana Paint, azure	412(E)	150	6/11
401	4	Commonwealth Paint, yellow	1526	148	11/11
404	4 5	Commonwealth Paint, orange yellow	1526 414	24 24	11/11 2/11
416	17	Trimbrite SWP, Ardmore green	6805	4	10/11
416	10	Trimbrite SWP, Ardmore green	412	150	3/21
416	8	Trimbrite SWP, Ardmore green	same as card 5 414 and zinc oxide or 412	40 100	4/21
416	6	Trimbrite SWP, Ardmore green	412	100	2/11
416	5	Trimbrite SWP, Ardmore green	414 and zinc oxide or 412	40 100	2/11
416	4 Alt A	Trimbrite SWP, Ardmore green	412	150	4/21

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
416	4	Trimbrite SWP, Ardmore green	412	100	11/1
416	3 Alt A	Trimbrite SWP, Ardmore green	412	150	4/2
416	2	Trimbrite SWP, Ardmore green	412	150	1/2
416	2 Alt A 3	Trimbrite SWP, Ardmore green	412	100	3/2 6/1
416	1	Trimbrite SWP, Ardmore green	412	50	8/2
417	17	SWP, green	6805	4	9/1
418	12 13	SWP, Solfast red	6805 6805	3 4	9/1 10/1
420	10	SWP, gray	412/6840 1424/6822	300 100	10/2
420	6	SWP, gray	412 6802 or 1424	300 100	4/0
420	5	SWP, gray	412 or 413	440	2/2
420	4	SWP, gray	412 or 413 1424 or 6828	350 50	1/2
420	3	SWP, gray	412 or 413 1424 or 1412	350 50	1/0
420	2	SWP, gray	412 or 413 1424 or 1412	350 50	12/0

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
420	1	SWP, gray	412	440	10/0
421	5	SWP, sage green	412	330	10/0
	9		6840/412	330	10/2
421	3	SWP, sage green	412	330	1/0
421	1	SWP, sage green	412	330	10/0
422	1 11	SWP, sage dark	412	300	10/0
433	3	PCP Paste, #33, light buff	1526	228	11/2
446	3	PCP Paste, cream SW Co.	1526	228	11/2
450	51 58	SWP, undercoater, wood	6805	175	12/
450	44	SWP, undercoater, wood	6801	230	10/
450	40	SWP, undercoater, wood	6801	230	7/2
450	38	SWP, undercoater, wood	6801 1424 or 6828	150 114	6/1
450	37 Alt A	SWP, undercoater, wood	6801 511	150 114	8/3
450	36	SWP, undercoater, wood	6801 1424	150 114	6/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
450	35	SWP, undercoater, wood	68A1 1424	150 114	5/31
450	31 34	SWP, undercoater, wood	511 and 18 or 412 and 18	240, 120 or 185, 175	11/1 1/5
450	30	SWP, undercoater, wood	511 and 18 zinc oxide or 2059 and 18	240, 120 or 120, 240	8/23
450	25 27	SWP, undercoater, wood	511, 18 511, 18	240, 238 240, 120	4/2 12/2
450	24	SWP, undercoater, wood	412 18	144 386	8/08
450	22	SWP, undercoater, wood	414 BW102	110 490	2/12
450	21 Alt A	SWP, undercoater, wood	412 BW 102 or 18	144 450 or 386	1/20
450	21	SWP, undercoater, wood	414 BW102 or 18	110 490 or 420	1/20
450	20	SWP, undercoater, wood	412 or 511, 414	144 72, 72	9/2
450	20 Alt A	SWP, undercoater, wood	BW 102	509	11/2
450	19	SWP, undercoater, wood	414 BW 102	120 497	8/02
450	18 Alt A	SWP, undercoater, wood	412 BW 102	150 405	3/10

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
450	18 Alt B	SWP, undercoater, wood	413 BW 102	154 438	3/10
450	18	SWP, undercoater, wood	413 BW 102	144 450	10/0
450	16	SWP, undercoater, wood	1526 BW102	156 436	7/2
450	15	SWP, undercoater, wood	1526 BW 102	156 436	4/2
450	14	SWP, undercoater, wood	414 BW 102	110 490	9/2
450	13	SWP, undercoater, wood	1526 BW 102	235 345	7/0
450	12	SWP, undercoater, wood	414 BW 102	218 575	1/1
450	11	SWP, undercoater, wood	414 BW 102	185 648	10/2
450	10	SWP, undercoater, wood	1526 BW 102	162 675	9/10
450	9	SWP, undercoater, wood	1526 BW 102	162 605	7/2
450	8	SWP, undercoater, wood	1526 BW 102	162 513	6/2
450	7	SWP, undercoater, wood	1526 BW 102	250 467	4/0

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
450	5	SWP, undercoater, wood	1526 BW104	300 410	10/2
450	3	SWP, undercoater, wood	412 BW 104	300 410	10/2
450	2	SWP, undercoater, wood	412 BW 104	300 410	8/2
450	1	SWP, undercoater, wood	412 BW 104	300 410	7/2
451	7	SWP - undercoater mildew resistant	6805	175	2/2
451	5	SWP - undercoater mildew resistant	6801 1424	150 114	9/1
451	4	SWP - undercoater mildew resistant	18 511	120 240	1/0
451	2	SWP - undercoater mildew resistant	18 511	120 240	6/1
451	1	SWP - undercoater mildew resistant	414 W BW 103	160 450	8/2
458	22	SWP, Plymouth green	68C6	345	8/2
458	21	SWP, Plymouth green	6840 6822	300 100	7/2
458	15	SWP, Plymouth green	412 68C2 or 6828 or 1424	300 100	4/0

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
458	14	SWP, Plymouth green	412 or 413 1424 or 6828 or 1412	350 50	2/1
458	11	SWP, Plymouth green	412 or 413 1424 or 1412	350 50	12/
458	4 Alt B 5	SWP, Plymouth green	412 413 or 412	650 440	9/1 10/
458	4 Alt A	SWP, Plymouth green	414 18	480 169	7/3
458	1	SWP, Plymouth green	412	650	8/2
459	23	SWP, Berkley yellow	68C6	345	8/2
459	21	SWP, Berkley yellow	6840 = 412 6822 = 1424	300 100	6/1
459	16	SWP, Berkley yellow	412 or 413 6802 or 1424 or 6828	300 100	4/
459	15	SWP, Berkley yellow	412 or 413	440	2/2
459	14	SWP, Berkley yellow	412 or 413 1424 or 6828 or 1412	350 50	1/2
459	13	SWP, Berkley yellow	412 or 413 1424 or 1412	350 50	1/
459	8	SWP, Berkley yellow	413 or 412	440	8/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
459	6	SWP, Berkley yellow	414 or 511 412	175, 265 440	1/
459	5	SWP, Berkley yellow	414 511 18	254 165 70	4/
459	4	SWP, Berkley yellow	412 18	400 70	7/
459	4 Alt C 4 Alt D 4 Alt E	SWP, Berkley yellow	see card 4 see 4 Alt A see card 4	see card 4 see 4 Alt A see card 4	9/
459	4 Alt A 4 Alt B	SWP, Berkley yellow	414 18 see card 4	295 175 see card 4	8/
459	3	SWP, Berkley yellow	414 BW102	400 82	2/
459	3 Alt B	SWP, Berkley yellow	414 BW 102	306 191	3/
459	3 Alt C	SWP, Berkley yellow	414 BW 102	413 317	4/
459	2	SWP, Berkley yellow	412 BW 102	400 82	2/
459	2 Alt B	SWP, Berkley yellow	412 BW 102	540 169	2/
459	I	SWP, Berkley yellow	412 BW 102	400 82	8/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
459	1 Alt A	SWP, Berkley yellow	BW 102	245	11/
459	1 Alt C	SWP, Berkley yellow	BW 102 18	82 140	11/
460	7 8 12	SWP, apple green	1526 1526	640 700	9/2 9/0
460	6 7	SWP, Winthrop Red	6805	4	11/2
461	13	SWP, Willow green	412	25	2/1
461	8	SWP, Willow green	412	25	9/1
462	30	SWP, cream	412	400	4/1
462	29	SWP, cream	412	450	2/0
462	28	SWP, cream	412 or 511	380 or 190	9/2
462	26	SWP, cream	413 or 412	410	4/0
462	25 Alt C	SWP, cream	413	525	1/2
462	25 Alt B	SWP, cream	413	410	12/2
462	25 Alt A	SWP, cream	413	438	10/
462	12	SWP, cream	412 or 413	662	6/0
462	11	SWP, cream	412	480	3/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
462	10	SWP, cream	412	460	11/
462	9	SWP, cream	412	460	5/1
465	25	SWP, Colonial yellow	412 1424	300 100	7/0
465	24	SWP, Colonial yellow	412 1424	300 100	6/1
465	23	SWP, Colonial yellow	412 1424	300 100	10/
465	22	SWP, Colonial yellow	412 1424	300 100	9/1
465	21	SWP, Colonial yellow	412 or 413 1424	300 100	6/1
465	20	SWP, Colonial yellow	412 or 413 1424	300 100	4/2
465	19 18	SWP, Colonial yellow	412 or 413 1424	300 100	10/ 6/1
465	19 Alt A	SWP, Colonial yellow	412 or 413 1424	300 100	3/1
465	17	SWP, Colonial yellow	412 or 413 1424	300 100	4/0
465	16	SWP, Colonial yellow	412 or 413	440	2/2
465	15-13	SWP, Colonial yellow	412 or 413 1424 or 1412	350 50	1/2 1/0 12/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
465	12, 11, 10	SWP, Colonial yellow	412 or 413	440	5/1 3/3 12/0
465	9	SWP, Colonial yellow	412 or 413	440	8/1
465	8, 7	SWP, Colonial yellow	511 412	265 440	6/0 1/2
465	6	SWP, Colonial yellow	511	215	1/2
465	5	SWP, Colonial yellow	511	163	4/2
465	4, 4 Alt E, 4, Alt C	SWP, Colonial yellow	412 18	400 70	7/3 9/1 9/1
465	4 Alt A 4 Alt D	SWP, Colonial yellow	18	175	8/
465	4 Alt B	SWP, Colonial yellow	412 18	400 70	8/
465	3	SWP, Colonial yellow	412	400	2/1
465	3 Alt A	SWP, Colonial yellow	412	540	2/1
465	2	SWP, Colonial yellow	412	400	2/0

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
465	2 Alt B	SWP, Colonial yellow	412	540	2/0
465	2 Alt A	SWP, Colonial yellow	412	400	2/0
465	1	SWP, Colonial yellow	412	400	8/2
465	1 Alt C	SWP, Colonial yellow	18	140	11/
466	5	Painter Paste Paint, White #66	18	100	6/1
466	3, 2	Painter Paste Paint, White #66	412 18	728 118	10/ 12/
466	1	Painter Paste Paint, White #66	412 18	728 116	8/2
470	30, 29	SWP, Golden Yellow	412 1424	300 100	10/ 7/0
470	28 Alt A 28 27	SWP, Golden Yellow	18 412	70 385	3/1 10/ 6/2
470	26 25	SWP, Golden Yellow	18 412	70 385	3/0 3/2
470	24	SWP, Golden Yellow	18 412	70 385	1/1
470	23	SWP, Golden Yellow	18 412	70 385	1/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	78 77 76	SWP, Gloss, White	412 1424	300 100	6/1 6/1 3/3
471	75 72	SWP, Gloss, White	412 1424	325 100	10/1 8/1
471	74	SWP, Gloss, White	412 1424	325 100	8/1
471	74 Alt A	SWP, Gloss, White	412 1424	300 100	10/1
471	73	SWP, Gloss, White	412 1424	325 100	8/1
471	71, 71 Alt F-1	SWP, Gloss, White	412 1424	325 100	5/1 7/1
471	70 Alt A 70 69	SWP, Gloss, White	412 1424	300 100	3/1 1/2 (date)
471	68 Alt A 68 67 Alt A	SWP, Gloss, White	412 1424	300 100	10/1 10/1 6/1
471	67 66 Alt B 66 Alt A	SWP, Gloss, White	412 1424	300 100	6/1 3/3 3/1
471	66 65 Alt B	SWP, Gloss, White	412 1424	300 100	3/1 3/1
471	65 64	SWP, Gloss, White	412 1424	200 200	2/2 1/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	65 Alt A	SWP, Gloss, White	412 1424	200 200	1/1
471	63 62	SWP, Gloss, White	1411 or 412 1412 or 1424	400 200 200	1/1 8/0
471	61 60	SWP, Gloss, White	1411 or 412 1412 or 1424	400 200 200	4/1 11/
471	59 58	SWP, Gloss, White	412	200	9/0
471	59 Alt A	SWP, Gloss, White	412	475	9/0
471	59 Alt C	SWP, Gloss, White	1411	425	9/1
471	59 Alt B	SWP, Gloss, White	413 18	200 25	9/0
471	58 Alt A	SWP, Gloss, White	412	475	8/1
471	57 56	SWP, Gloss, White	412	475	8/0
471	55 54	SWP, Gloss, White	412	200	4/0
471	53 52 51	SWP, Gloss, White	412 or 511	475 290	3/0 2/0 1/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	50	SWP, Gloss, White	412	300	1/1
471	49	SWP, Gloss, White	511 and 414W or 412 18 or BW102	275 and 175 or 450 60 or 70	4/1
471	48	SWP, Gloss, White	412 18	450 60	2/1
471	48 Alt A	SWP, Gloss, White	18	178	2/1
471	47 Alt B 47	SWP, Gloss, White	412 18	480 70	9/1 7/2
471	47 Alt C	SWP, Gloss, White	18	195	9/1
471	47 Alt A	SWP, Gloss, White	18	195	7/2
471	46	SWP, Gloss, White	511 18	300 70	4/2
471	46 Alt A	SWP, Gloss, White	511 18	365 70	4/2
471	45 45 Alt A	SWP, Gloss, White	412 18	509 159	3/1
471	44	SWP, Gloss, White	412 18	509 159	1/2
471	43 42	SWP, Gloss, White	412 18	480 70	6/1 9/1

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	43 Alt B	SWP, Gloss, White	511 18	300 70	6/1
471	43 Alt A	SWP, Gloss, White	18	238	6/1
471	42 Alt A	SWP, Gloss, White	18	238	10/
471	41 Alt B 41 Alt A 41	SWP, Gloss, White	412 18	480 70	1/1
471	40 Alt A 40	SWP, Gloss, White	412 18	400 128	9/2 9/1
471	40 Alt B	SWP, Gloss, White	412 18	400 128	9/2
471	39	SWP, Gloss, White	18	257	6/2 1/2
471	38	SWP, Gloss, White	412 18	490 128	10/
471	38 Alt A	SWP, Gloss, White	412 18	490 128	9/2
471	38 Alt C	SWP, Gloss, White	412 18	490 129	3/0
471	38 Alt B	SWP, Gloss, White	18	206	1/2
471	37	SWP, Gloss, White	412 18	490 128	8/1
471	37 Alt B	SWP, Gloss, White	412 BW 102	490 150	9/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	36 Alt A	SWP, Gloss, White	412 18	490 150	7/2
471	36	SWP, gloss white	412 18	490 128	7/2
471	35	SWP, gloss white	412 18	490 128	10/
471	34	SWP, gloss white	412 18	225 236	4/0
471	33	SWP, gloss white	412 18	392 372	1/1
471	32	SWP, gloss white	412 18	590 370	1/1
471	31 29	SWP, gloss white	412 BW 102	470 526	12/ 9/2
471	30	SWP, gloss white	412 18	500 350	10/
471	28	SWP, gloss white	412 BW 102	470 350	7/1
471	27 26	SWP, gloss white	BW 102 412	220 470	5/1 7/1
471	25 24 23	SWP, gloss white	BW 102 412	220 470	4/ 1/ 9/1
471	23	SWP, gloss white	412 BW 102	470 220	9/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	22	SWP, gloss white	412 BW 102	500 384	7/2
471	21 20 19	SWP, gloss white	412 BW 102	500 387	4/1 6/2 5/1
471	18	SWP, gloss white	412 BW 102	525 460	12/
471	17 16 (apparently replaced on 5/10/35) 16	SWP, gloss white	412 18 412 BW102 412 18	525 400 525 460 525 400	9/0 9/2 5/1
472	10, 9, 8 Alt A	SWP, Mildew Resisting, White	412 18	450 60	10/ 6/1 3/1
472	8 7 6	SWP, Mildew Resisting, White	412 18	450 60	10/ 6/1 5/0
472	4 3	SWP, Mildew Resisting, White	412 18	450 60	1/1 3/3
472	2	SWP, Mildew Resisting, White	412 18	450 60	6/1
472	1	SWP, Mildew Resisting, White	412	470	8/2
473	11 10 9	SWP, tinting white	412 1424	300 100	7/2 6/0 11/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date c
473	8 7 6 Alt A	SWP, tinting white	412 1424	300 100	6/1 5/2 4/1
473	6 5 Alt A 5	SWP, tinting	412 1424	300 100	4/1 3/1 10/0
473	4 3	SWP, tinting	412 1424	300 100	6/1 4/0
473	2 1	SWP, Tinting white	412 1424	200 200	10/0 8/0
474	25 24	SWP, Chelsea Gray	412 1424	300 100	7/2 6/1
474	23 22 21 20 Alt A	SWP, Chelsea Gray	412 or 413 1424	300 100	10/0 6/1 6/1 3/1
474	20 19 18 17	SWP, Chelsea Gray	412 or 413 68C2 or 1424 or 6828	300 100	10/0 7/0 6/1 4/0
474	16	SWP, Chelsea Gray	412 or 413	440	2/2
474	15 14 13	SWP, Chelsea Gray	412 or 413 1424 or 1412	350 50	1/2 1/1 12/0
474	12 11 10	SWP, Chelsea Gray	412 or 413	440	5/1 3/3 12/0

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
474	9	SWP, Chelsea Gray	413 or 412	440	8/1
474	8	SWP, Chelsea Gray	511	265	6/0
	7		412	440	1/2
474	6	SWP, Chelsea Gray	511	215	1/2
474	5	SWP, Chelsea Gray	511	163	4/2
			18	70	
474	4 Alt C	SWP, Chelsea Gray	412	400	9/1
			18	70	
474	4 Alt B	SWP, Chelsea Gray	412	400	8/0
	4		18	70	7/3
	4 Alt E				9/1
474	4 Alt A	SWP, Chelsea Gray	18	175	8/0
	4 Alt D				
474	3	SWP, Chelsea Gray	412	400	2/1
	2 Alt A		18	70	2/0
474	3 Alt C	SWP, Chelsea Gray	18	272	4/0
474	3 Alt B	SWP, Chelsea Gray	18	164	3/2
474	3 Alt A	SWP, Chelsea Gray	412	540	2/1
			18	145	
474	2	SWP, Chelsea Gray	412	400	2/0
			18	70	
474	2 Alt B	SWP, Chelsea Gray	412	540	2/0
			18	145	

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
474	1	SWP, Chelsea Gray	412 18	400 70	8/2
474	1 Alt C	SWP, Chelsea Gray	18 BW 102	140 82	11/
474	1 Alt B 1 Alt A	SWP, Chelsea Gray	18	210	11/
476	8 7 6 5	SWP, One Coat, White	412	450	6/1 12/1 10/1 5/1
476	4 3 2	SWP One Coat, White	412	460	10/1 6/2 3/1
476	4 Alt A	SWP One Coat, White	412	460	3/1
476	1	SWP One Coat, White	412	460	3/0
477	19 18 17 Alt F-2	SWP, Westchester Gray	412 1424	165 165	2/2 12/1 12/1
477	17 17 Alt Y-1 16	SWP, Westchester Gray	412 or 413 1424	165 165	3/2 10/1 3/1
477	15 Alt A 15 14	SWP, Westchester Gray	412 or 413 1424	165 165	9/0 5/0 11/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
477	13 12 11	SWP, Westchester Gray	412 or 413	330	5/1 3/3 12/0
477	10 9	SWP, Westchester Gray	412 or 413	330	8/1 8/1
477	8 7	SWP, Westchester Gray	511 412	198 330	6/0 1/2
477	6	SWP, Westchester Gray	412 18	300 53	1/0
477	5	SWP, Westchester Gray	511 18	163 70	4/2
477	4 Alt E 4 Alt C	SWP, Westchester Gray	412 18	400 70	9/1 9/1
477	4 Alt A 4 Alt D	SWP, Westchester Gray	18	175	8/0 9/1
477	3	SWP, Westchester Gray	412 18	400 70	2/1
477	3 Alt A	SWP, Westchester Gray	412 18	540 145	2/1
477	3 Alt C	SWP, Westchester Gray	18	272	4/0
477	3 Alt B	SWP, Westchester Gray	18	164	3/2
477	2 4 Alt B 4	SWP, Westchester Gray	412 18	400 70	2/0 8/0 7/3

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
477	2 Alt A	SWP, Westchester Gray	412 18	400 70	2/0
477	2 Alt B	SWP, Westchester Gray	412 18	540 145	2/0
477	1	SWP, Westchester Gray	412 18	400 70	8/2
477	1 Alt B 1 Alt A	SWP, Westchester Gray	18	210	11/ 11/
478	23	SWP, Geneva Cream	68C6	345	8/2
478	22 21	SWP, Geneva Cream	412 1424	300 100	7/2 6/1
478	20 19 18 Alt A	SWP, Geneva Cream	412 or 413 1424	300 100	10/ 6/1 3/1
478	18 17 16	SWP, Geneva Cream	412 or 413 1424	300 100	10/ 6/1 4/0
478	15	SWP, Geneva Cream	412 or 413	440	2/2
478	14 13 12	SWP, Geneva Cream	412 or 413 1424 or 1412	350 50	1/2 1/1 12/
478	11 10 9	SWP, Geneva Cream	412 or 413	440	5/1 3/3 12/
478	8	SWP, Geneva Cream	413 or 412	440	8/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
478	7 6	SWP, Geneva Cream	511 412	265 440	6/6 1/2
478	5	SWP, Geneva Cream	511 18	163 70	4/2
478	4 Alt C 3	SWP, Geneva Cream	412 18	400 70	9/1 2/1
478	4 Alt A 4 Alt D	SWP, Geneva Cream	18	175	8/1 9/1
478	4 Alt B 4 4 Alt E	SWP, Geneva Cream	412 18	400 70	8/0 7/3 9/1
478	3 Alt B	SWP, Geneva Cream	18	164	3/2
478	3 Alt A	SWP, Geneva Cream	18 412	145 540	2/1
478	3 Alt C	SWP, Geneva Cream	18	272	4/0
478	2	SWP, Geneva Cream	412 18	400 70	2/0
478	2 Alt B	SWP, Geneva Cream	412 18	540 145	2/0
478	2 Alt A	SWP, Geneva Cream	412 18	400 70	2/0
478	1	SWP, Geneva Cream	412	400	8/2
478	1 Alt B 1 Alt A	SWP, Geneva Cream	BW 102 (18)	210	11/0 11/0

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
478	1 Alt C	SWP, Geneva Cream	18 BW 102 (18)	140 70	11/1
479	26	SWP, Pearl Gray	412 BW 102 (18)	475 60	5/0
479	25	SWP, Pearl Gray	18	145.7	3/0
479	24	SWP, Pearl Gray	18	193	2/1
479	23	SWP, Pearl Gray	1140	193	2/1
479	22	SWP, Pearl Gray	1140	80	11/1
479	22 Alt B	SWP, Pearl Gray	1140	518	10/2
479	22 Alt A	SWP, Pearl Gray	BW 103	351	10/2
479	13	SWP, Pearl Gray	412	406	5/3
479	12	SWP, Pearl Gray	412	480	3/1
482	14 13 12 Alt A 12	SWP, Hillcrest green	412	40	7/1 6/1 3/1 6/2
482	11 10	SWP, Hillcrest green	412	40	12/1 1/1
482	9	SWP, Hillcrest green	412	40	7/3
482	8	SWP, Hillcrest green	412 or 511	50 30	2/1
482	7	SWP, Hillcrest green	412 or 511	50 30	4/2

*All Rex numbers shown with an asterisk are John Lucas'Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
482	6 5 4	SWP, Hillcrest green	412	50	11/1 5/7 2/1
482	3	SWP, Hillcrest green	412	50	6-5
482	2	SWP, Hillcrest green	412	50	10-2
482	2 Alt A	SWP, Hillcrest green	412	120	1-2
483	7 6	SWP, Sagamore Green	18	3	8-1 9-2
485	20	SWP, #485 Warm Drab	1140	193	2-1
485	19	SWP, #485 Warm Drab	1140	80	11-
485	19 Alt B	SWP, #485 Warm Drab	BW102	538	10-
485	19 Alt A	SWP, #485 Warm Drab	BW102	370	10/2
485	18	SWP, #485 Warm Drab	BW 102	607	9-2
485	18 Alt A	SWP, #485 Warm Drab	BW 102	815	9-2
485	17	SWP, #485 Warm Drab	BW 102	93	7-2
485	16	SWP, #485 Warm Drab	BW 102	92	5-
486	19 18	SWP, Golden Brown	412 1424	300 100	10- 9-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
486	17 16	SWP, Golden Brown	412	480	10-6-
486	17 Alt A 15 14	SWP, Golden Brown	412	480	3-12-10-
486	13	SWP, Golden Brown	412	480	1-
486	12	SWP, Golden Brown	412	480	3-
486	11	SWP, Golden Brown	412	480	6-
486	10	SWP, Golden Brown	412	480	7-
489	5 4 3 2 1	SWP, Tyrone Yellow	68C6	50	5-8-10-8-6-2-
491	15	Family Paint, Light Gray	412	490	4-
491	14	Family Paint, Light Gray	412	490	2-
491	10 9	Family Paint, Light Gray	1140	58	7-11-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	
491	8 7 6	Family Paint, Light Gray	411B	490	
491	5	Family Paint, Light Gray	411B or 1526	490	
491	8 Alt B	Family Paint, Light Gray	411B	390	
493	19	SWP, Woodland Brown	18	3	
493	13 11 7 6	SWP, Woodland Brown	412	30	
493	12	SWP, Woodland Brown	412	30	
493	10 9 8	SWP, Woodland Brown	412	30 6	
493	5	SWP, Woodland Brown	511 or 412	36 60	
493	4 3	SWP, Woodland Brown	412	60	
493	2 1	SWP, Woodland Brown	412	60	

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
495	18	SWP, Manor Brown	18	4	8
495	16 13	SWP, Manor Brown	412	80	10 6
495	16 Alt A	SWP, Manor Brown	412	80	3
495	15 14 8	SWP, Manor Brown	412	80	8 6 3
495	12 11	SWP, Manor Brown	412	50	12 1
495	10 9	SWP, Manor Brown	412	80	1 5
495	7	SWP, Manor Brown	412	80	2
495	6	SWP, Manor Brown	511 or 412	50 80	4
495	5 4	SWP, Manor Brown	412	80	1 11
495	3 2	SWP, Manor Brown	412	80	6 10

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
495	1	SWP, Manor Brown	412	8	8-2
496	60 - 57	SWP, Ivory	68C6	345	4- 12- 11- 11- 10-
496	56	SWP, Ivory	68C6	345	8-2
496	55 54	SWP, Ivory	412 1424	300 100	7-2 6-1
496	53 52 51 Alt A 51	SWP, Ivory	412 or 413 1424	300 100	10- 6-1 3-1 10-
496	50 49	SWP, Ivory	412 or 413 1424	300 100	6-1 4-
496	48	SWP, Ivory	412 or 413	440	2-2
496	47 46 45	SWP, Ivory	412 or 413 1424 or 1412	315 50	1-2 1-1 12-
496	44 43 42	SWP, Ivory	412 or 413	440	5-1 3-3 12-
496	41 40	SWP, Ivory	413 or 412	440	9- 8-2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
496	39 38	SWP, Ivory	511 412	265 440	6-6 1-2
496	37	SWP, Ivory	511 18	163 70	4-2
496	36 Alt A 36 Alt D	SWP, Ivory	18	175	8-1 9-1
496	36 Alt B 36 36 Alt E 36 Alt C	SWP, Ivory	412 18	400 70	8-1 7-3 9-1 9-1
496	35 34 Alt A	SWP, Ivory	412 18	400 70	2-1 2-6
496	35 Alt A	SWP, Ivory	412 18	540 145	2-1
496	35 Alt B	SWP, Ivory	18	164	3-2
496	35 Alt C	SWP, Ivory	18	272	4-1
496	34	SWP, Ivory	412 18	400 70	2-6
496	34 Alt B	SWP, Ivory	412 18	540 145	2-6
496	33	SWP, Ivory	412 18	400 70	4-1
496	33 Alt C	SWP, Ivory	18 BW 102 (18)	140 70	11-1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
496	33 Alt B 33 Alt A	SWP, Ivory	18	210	11- 11-
496	32	SWP, Ivory	412 18	480 70	2-
496	32 Alt A	SWP, Ivory	412 18	450 70	2-
496	31 Alt A 31	SWP, Ivory	412 or 511	380 190	9-2 9-2
496	30 Alt A 30	SWP, Ivory	18	198	6-2 8-
496	29	SWP, Ivory	413 or 412 18	410 85	4-
496	28	SWP, Ivory	18	60	7-2
496	28 Alt C	SWP, Ivory	18	68	1-2
496	28 Alt A	SWP, Ivory	413 18	438 97	10-
496	28 Alt B	SWP, Ivory	413 18	410 85	12-
496	27	SWP, Ivory	18	60	5-
496	26	SWP, Ivory	18	145.7	3-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No. .	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
496	25	SWP, Ivory	18	193	2-1
496	24	SWP, Ivory	BW 102 (1140)	193	2-1
496	23	SWP, Ivory	412 1140	466 127	11-
496	23 Alt B	SWP, Ivory	1128 1140	5 517	10-3
496	23 Alt A	SWP, Ivory	412 BW102	530 392	10-2
496	22	SWP, Ivory	412 BW102	430 574	9-1
496	22 Alt A	SWP, Ivory	BW102	759	9-2
496	21	SWP, Ivory	412 BW102	466 148	7-2
496	20	SWP, Ivory	412 BW102	466 147	5-3
496	19 18 17 16	SWP, Ivory	412	466	7-2 4- 1- 11-
496	15	SWP, Ivory	412	662	6-
496	14	SWP, Ivory	412 BW102	480 400	3-1
496	13	SWP, Ivory	412D	775	9-2
496	4	SWP, Ivory	412	466	5/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
498	9	SWP, Moss Green	412	25	11-7
690	3	Screen Enamel Green Cust: SW Co.	18	34	12-1
690	2	Screen Enamel Green Cust: SW Co.	18	30	5-1
757	26 25 24 23	Shingle Stain, Thatch Brown SW Co.	1424	8	2-8 4-2 10-1 2-1
757	22 21	Shingle Stain, Thatch Brown SW Co.	1424	8	1-1 11-1
757	20 19	Shingle Stain, Thatch Brown SW Co.	1424	8	9-2 6-2
757	18	Shingle Stain, Thatch Brown SW Co.	1425	8	4-10
761	28 27 26 25	Shingle Stain, Dark Green SW Co.	1424	8	6-1 2-8 4-2 10-1
763	25 24 23 22	Shingle Stain, Green SW Co.	1424	8	2-8 4-2 10-1 2-1
763	21 20	Shingle Stain, Green SW Co.	1424	8	1-1 11-1

All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.-	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
763	19 18	Shingle Stain, Green SW Co.	1424	8	9-2 6-5
763	17	Shingle Stain, Green SW Co.	1425 or 1424	8	4-2
765	23 22	Shingle Stain, Indian Red SW Co.	1424	8	2-2 4-2
765	21 20 17 16	Shingle Stain, Indian Red SW Co.	1424	8	10- 2-1 9-2 6-2
765	19 18	Shingle Stain, Indian Red SW Co.	1424	8	1-1 11-1
765	15	Shingle Stain, Indian Red SW Co.	1425	8	4-2
765	9	Shingle Stain, Indian Red SW Co.	412	8	2-2
766	2	Shingle Stain, Thatch Brown SW Co.	1424	6	1-2
766	1	Shingle Stain, Thatch Brown SW Co.	1425 or 1424	6	6-2
768	2	Shingle Stain, Indian Red SW Co.	1424	6	1-4
768	1	Shingle Stain, Indian Red SW Co.	1425 or 1424	6	6-2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of C
771	30 29 28 27	Shingle Stain, gray SW Co.	412	228	3-11-54 2-8-54 6-15-53 6-25-52
771	26 25 24 21	Shingle Stain, gray SW Co.	412	228	4-28-52 10-15-5 5-14-51 6-23-50
771	23 22	Shingle Stain, gray SW Co.	412	228	1-19-51 11-14-50
771	20 19 18 17	Shingle Stain, gray SW Co.	412	228	6-15-50 7-25-49 6-13-49
771	16 15	Shingle Stain, gray SW Co.	412	228	5-6-48 2-20-47
794	3 2	Shake paint, winter white SW Co.	412	200	7-23-53 6-19-52
794	1	Shake paint, winter white SW Co.	412	125	10-12-5
795	3 2	Shake Paint, Desert Sand SW Co.	412	200	7-22-53 6-19-52
795	1	Shake Paint, Desert Sand SW Co.	412	125	10-12-5
796	3 2	Shake Paint, Columbia Green SW Co.	412	200	7-29-53 6-19-52

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
796	1	Shake Paint, Columbia Green SW Co.	412	120	10-2
797	3 2	Shake Paint, Surf Green SW Co.	412	250	7-2 6-2
797	1	Shake Paint, Surf Green SW Co.	412	125	10-1
798	5 4 3 2	Shake Paint, Feather Gray SW Co.	412	200	1-1 11-1 7-2 6-1
798	1	Shake Paint, Feather Gray SW Co.	412	125	10-1
799	4 3 2	Shake Paint, brown SW Co.	412	150	7-2 7-1 6-1
799	1	Shake Paint, brown SW Co.	412	56	10-1
910	8 7 6	Brick and stucco, white SW Co.	412	500	7-1 6-1 6-2
910	5 3	Brick and stucco, white SW Co.	412	500	2-2 3-1
910	4	Brick and stucco, white SW Co.	412	500	11-1
910	2	Brick and stucco, white SW Co.	412	500	5-2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
910	1	Brick and stucco, white SW Co.	412 or 511 414	760 380 380	9-2
911	1	Brick and stucco, ivory SW Co.	412	760	8-2
913	8 7 6	Brick and stucco, cream SW Co.	412	500	7- 6- 6-2
913	5	Brick and stucco, cream SW Co.	412	500	9-2
913	4 3	Brick and stucco, cream SW Co.	412	760	2- 11-
913	2 1	Brick and stucco, cream SW Co.	412	760	8- 4-
A1445*	3	Canvas Preservative Buff	412	39	5/2
1559*	1	White Lead Paste in Oil-Basic Carbonate	18	895	10-
MO-1582*	1	Special Red Boottopping	412	141	1/2
1621*	1	White Lead Whiting Putty	9	86	7/2
1684*	1	Exterior Paint, white	412(E) 18	527 545	7/2
A1772*	1	Gray Primer	315	578	8/2
1774*	1	Auto Filler, gray	9	492	11-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
A2296*	4	Cinder Gray Exterior Paint For Central Supply Company	18	273	7/1
A2296*	1	Cinder Gray Exterior Paint For Central Supply Company	18	342	5/1
2604*	1	White Lead Whiting Putty	18	73	7/5
A3263*	4-1	Dura-Mix Floor and Deck Enamel, chestnut	9	35	3/1 7/1
A3618*	2	Marlyn Seal Color For Capitol Wallpaper Co.	412(E) 18	685 335	5/2
A3618*	1	Marlyn Seal Color For Capitol Wallpaper Co.	412(E) 18	395 193	4/2
A3619*	2	Marlyn Trim Color For Capitol Wallpaper Co.	412(E) 18	581 284	5/2
A3619*	1	Marlyn Trim Color For Capitol Wallpaper Co.	412(E) 18	363 177	4/2
A3691*	2	Exterior Paint, white For US Government	18	740	4/2
A3691*	1	Exterior Paint, white For US government	412(E) 18	342 805	4/2
A3797*	1	Exterior paint-white For U.S. Government	18	460	12/2
A4582*	2-1	Lucolastic No. 2, red boottopping	412	141	7/5 2/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
A6009*	2 Alt A-1	Blue Lead Primer For Leonard Miller	6815	400	1/20 9/2
A6117*	3-1	Tinted Gloss, caribbean green For Export	412	300	1/20 11/2
A6117*	4	Tinted Gloss, caribbean green For Export	68C6	300	1/3
A6198*	2-1	House Paint, white For Speedwell Paint & Wallpaper	68C6	200	7/1 10/2
A6198*	6 4-3	House Paint, white For Speedwell Paint & Wallpaper	6829	200	5/2 1/30/59 thro
A6205*	11-7	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	68A4	175	5/1 2/7
A6205*	6	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	68A4	175	8/2
A6205*	5-4	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	6805	175	3/1 8/2
A6205*	3-2	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	6801	230	1/2 11/2
A6246*	2	House Paint, white For Speedwell Paint & Wallpaper	6829	200	5/1
A6283*	4-3	Levittown Q.D. Dipping Primer For Builders Supply	6805	150	10/3 8/1
A6334*	3-2	Q.D. Dipping Primer for Levittown For Builders Supply	68A4	150	5/2 1/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date o
A6334*	1	Q.D. Dipping Primer for Levittown For Builders Supply	68A4	150	5/25 1/1
A6346*	4-3	One Coat White for Levittown For Builders Supply	6829	125	5/25 6/2
A6346*	2-1	One Coat White for Levittown For North Shore Supply Co.	6829	125	8/2 3/1
A6347*	5	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6822	175	3/5
A6347*	4-2	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6829	200	9/10 6/2
A6347*	1	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6829	200	3/1
A6349*	6-5	1 Coat House Paint for Levittown For Builders Supply Corp.	6829	225	5/25 3/5
A6349*	4-2	1 Coat House Paint for Levittown For Builders Supply Corp.	6829	125	6/2 5/4
A6351*	3	Trim Color, Slate Gray for Levittown	6829	125	4/1
A6377*	7 Alt A-1	"500" House Paint Primer Mildew Resistant, white For John Lucas Trade Sales	68A4	125	4/5 11/1
A6569*	3-2	House Paint Exterior Primer, white For S. Yospin and Sons.	68A4	175	8/4 9/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
A6570*	2	House Paint Exterior Gloss, white For S. Yospin and Sons	6829	200	8/1
13288*	1	Iron Paint Steel Color	9 412(E)	43 50	2/2
16129*	1	English Patent Drier, Paste	9	260	10/1
17460*	1	25% White Lead Putty For Trade in General	18	110	4/2
63708	2	Mildew Resistant SWP, driftwood gray For Export	412 1424	300 100	9-2
63709	2	Mildew Resistant SWP, canyon rose For Export	412 1424	300 100	9-2
63710	2	Mildew Resistant SWP, rock gray For Export	412 1424	300 100	9-2
63711	2	Mildew Resistant SWP, dakota gray For Export	412 1424	300 100	9-2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

EXHIBIT B

ADDENDUM OF WHITE LEAD PIGMENTS¹

Raw Material No.	Card No.	Name, Color and Type	Weight of Raw Material**	Date of Card	Indicated Supplier
BW 102	2	Basic Carbonate White Lead Paste	29.3 lbs./gal.	1/29/48	National Lead
BW 103	2	Basic White Lead Carbonate in Oil	22.4 lbs./gal.	1/29/48	National Lead
68 A 1	1	Basic Silicate of Lead 45X	3.0 gal./100 lbs.	1/23/51	National Lead
6801	1	Basic Silicate of Lead 45X	3.0 gals./100 lbs.	6/7/51	National Lead
	2			7/15/53	
6801	3	Basic Silicate of Lead, 45X	3.0 gals./100 lbs.	6/24/55	National Lead
6801	4	Basic Silicate of Lead, 45X	3.0 gals./100 lbs.	9/21/64	National Lead
68 01 00	5	Basic Silicate White Lead	3.0 gals./100 lbs.	3/12/70	National Lead
68 01 00	6	Basic Silicate White Lead	3.0 gals./100 lbs.	7/10/73	National Lead
68 06 22	2	White Lead (Basic Carbonate White Lead)	55.87 lbs/gal.	10/22/69	Carter White Lead Canada and Irving (West Coast)
68 06 22	3	White Lead (Basic Lead Carbonate)	55.87 lbs/gal.	5/14/70	Carter White Lead Canada and Irving

The information in this chart was compiled from a review of available raw material cards. The raw material cards are 28 to 45 years old, are not complete and only fragmented information of the information cannot be verified. The information provided is taken directly as written on the cards, so that it may in some instances be ambiguous and subject to further interpretation. It is believed that the existence of a raw material card does not necessarily mean that the raw material was actually used during any particular point in time, or ever was used in a particular application. A raw material could have ceased before the raw material card was formally voided, or could cease without being formally voided. Some raw materials appear to have been used only for residential purposes. Information is provided for all white lead pigments that might have been used for residential purposes, even though some raw materials may not actually have been used for such purposes. This information indicates possible uses for the raw material. It is believed that such uses were potential uses but not necessarily actual uses.

**The figures shown in the "Weight of Raw Material" column indicate the total weight by volume of the material, including any non-lead component.

***The "Indicated Supplier" column denotes possible sources supply but does not necessarily mean the pigment actually was supplied, the amounts that were supplied, or the quantity supplied.

****The "Indicated Use" column denotes possible uses but does not necessarily mean actual use, the amount of use, or the time periods of use.

Raw Material No.	Card No.	Name, Color and Type	Weight of Raw Material**	Date of Card	Indicated Supplier
6805	1	White Lead (Basic Lead Carbonate)	1.79 gals./100 lbs.	9/1/54	National Lead
68 A 4	1	White Lead Basic Lead Carbonate	1.79 lbs./gal.	2/19/58	National Lead
68 M 2	1	Scotch Laddie White Lead (Basic Lead Carbonate)	1.77 gals./100 lbs.	8/28/62	National Lead
9	1	Basic Lead Sulphate	53.31 lbs./gal.	7/27/44	National Lead, Eagle and Coffey
18	1	White Lead, Carter	56.56 lbs./gal.	8/30/43	Card indicate Chicago, Eagle, Carter and Anaconda name of product and names of suppliers ambiguous
18	2	Basic Carbonate White Lead	55.81 lbs./gal.	9/17/47	National Lead
18	3	White Lead H.T.S. Type	56.6 lbs./gal.	2/2/48	National Lead
1031	1	Scotch Laddie White Lead	57.14 lbs./gal.	7/16/43	John R. MacGregor Co.
1140	1	Straight Old Dutch Process (Dry White Lead)	57.48 lbs./gal.	12/10/45	Ozark Smelting National Lead
1140E	1	Eagle Picher O.D.P.	57.48 lbs./gal.	12/10/45	Eagle Picher
1812 Experimental No. CW 769	1	Euston White Lead	56.64 lbs./gal.	10/23/44	None indicated
2144	2	#333 Lead Carbonate	57 lbs./gal.	5/14/48	None indicated
68 C 7	1	Basic Silicate of Lead 45X-1P6	3.0 gal./100 lbs.	4/18/57	National Lead

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**The figures shown in the "Weight of Raw Material" column indicate the total weight by volume of the material, including any non-lead component.

***The "Indicated Supplier" column denotes possible sources supply but does not necessarily mean the pigment actually was supplied, the amounts that were supplied, or the quantity supplied.

****The "Indicated Use" column denotes possible uses but does not necessarily mean actual use, the amount of use, or the time periods of use.

Raw Material No.	Card No.	Name, Color and Type	Weight of Raw Material**	Date of Card	Indicated Supplier
68 03 20	1	Basic Silicate White Lead -- Eagle Picher 202	53.19 lbs./gal.	5/13/68	Eagle Picher
68 03 20	2	Basic Silicate White Lead	53.19 lbs./gal.	9/4/68	Eagle Picher
68 03 21	1 2	Tribasic Lead Phosphosilicate (P-7 Lead Phosphosilicate)	49.98 lbs./gal.	12/22/69 4/29/70	Hammond Chem
68 A 5	1	White Lead , HiStain Basic Lead Carbonate	1.5 gal./100 lbs.	7/29/60	South American M Merchandising
68 T 1	1	Basic White Lead Carbonate	N/A	4/9/62	So. American Mi Merchandise
6810	1	Basic Lead Sulfate	1.88 gal./100 lbs.	4/30/52	Eagle Picher
6810	2	Basic Lead Sulfate	1.88 gal./100 lbs.	9/9/52	Eagle Picher
6810	3	Basic Lead Sulfate	1.88 gal./100 lbs.	8/8/57	Eagle Picher
6810	4	Sublimed White Lead	1.88 gal./100 lbs.	4/20/61	Eagle Picher

**The figures shown in the "Weight of Raw Material" column indicate the total weight by volume of the material, including any non-lead component.

***The "Indicated Supplier" column denotes possible sources supply but does not necessarily mean the pigment actually was supplied, the amounts that were supplied, or the quantity supplied.

****The "Indicated Use" column denotes possible uses but does not necessarily mean actual use, the amount of use, or the time periods of use.

PK 1003130v1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE CITY OF NEW YORK, et al.,	:	Index No. 14365/89
Plaintiffs,	:	IAS Part 28
- against -	:	(Justice Freedman)
LEAD INDUSTRIES ASSOCIATION, INC., et al.,	:	
Defendants.	:	
	:	
	:	

**THE SHERWIN-WILLIAMS COMPANY'S SUPPLEMENTAL RESPONSES
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES NOS. 9 AND 52**

Pursuant to agreement of the parties, The Sherwin-Williams Company provides supplemental responses to Plaintiffs' First Set of Interrogatories, Nos. 9 and 52. Sherwin-Williams' prior responses and objections to these interrogatories are incorporated by reference and are not waived by this supplemental response. The supplemental responses are based on information compiled from a review of Sherwin-Williams' available paint formula cards, generally limited to paints for residential surfaces. Since the paint formula cards are 30 to 70 years old, the formula cards are not complete, only fragmented information is still available today, and the accuracy of the information on the formula cards cannot be verified. The information provided is taken directly as written on the formula cards, so that it may in some instances be ambiguous and subject to further interpretation. The existence of a formula card does not mean that a paint formula was actually produced and marketed during any particular point in time. There typically was a period of time after a paint formula was no longer produced

before a paint formula was voided, and some formulas were created only for emergency or stand-by use. Information is provided for all paints that contained a white lead pigment and that might have been used for interior or exterior residential purposes. Sherwin-Williams has erred on the side of including those paints for which the possible uses were not clear; therefore, some paints not intended for residential use might be included among the information provided in the supplemental interrogatory answers.

SUPPLEMENTAL RESPONSES

Interrogatory No. 9

Did defendant or any of its predecessors ever produce paints containing lead for use in or on dwellings and other buildings occupied by children? If so, please state the inclusive years in which such paints were produced, and for each paint, state:

- a. the manufacturer and the brand or trade name of the paint;
- b. the purposes for which the paint was intended to be used; and
- c. the highest supervisory employee with the most knowledge concerning the production of said paints.

Supplemental Response to Interrogatory No. 9:

- a. See the attached chart.
- b. See the attached chart
- c. Unknown. A person with knowledge of the information contained on the formula cards is Stephen Turnbull, a current employee of The Sherwin-Williams Company.

Interrogatory No. 52

If the defendant has ever reduced the percentage of lead by weight in any paints that it has produced, give the date, the reason for the reduction, and whether the reduction was pursuant to an industry-wide standard or agreement. Identify any documents used to respond to this interrogatory.

Supplemental Response to Interrogatory No. 52:

See the attached chart. Sherwin-Williams' paint formulations were continually changing throughout the time period for which formula cards still exist. The attached chart provides the dates on which each paint formula changed with respect to lead compounds. The reasons for the reductions in the amount of lead pigment are often not given in the formula cards. The reductions were not because of any industry agreement, as Sherwin-Williams independently formulated its paints and often was an industry leader in developing non-lead pigments (such as lithopone) or paints not using white lead pigments (such as Kem-Tone and Kem-Glo), but Sherwin-Williams believes that it complied with industry standards, such as those set by the American Standards Association, and applicable laws and regulations. The reasons indicated on the formula cards for reductions in the amount of lead pigments include conservation of raw

materials, frequently as a result of wartime shortages, lack of supply of raw materials, and changes in technology, such as a change to the use of alkyd resins from oils.

Dated: New York, New York

Respectfully submitted,

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AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA)
) ss:
COUNTY OF ALLEGHENY)

Charles H. Moellenberg Jr., being duly sworn, deposes and says:

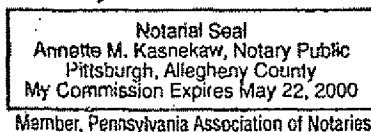
1. Deponent is not a party to this action, is over 18 years of age and resides at 2569 Corteland Avenue, Upper St. Clair, Pennsylvania, 15241..

2. On 9/4/98, deponent served the within Supplemental Responses To Plaintiffs' First Set Of Interrogatories Nos. 9 and 52 by depositing true copies thereof enclosed in a post-paid wrapper, in an official depository under the exclusive custody of the U.S. Postal Service within the State of Pennsylvania, addressed to the counsel on the attached list.

Charles H. Mallenborg, Jr.

Sworn to before me this
4th day of September, 1998

Annette M. Zsnirow
Notary Public



SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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LEAD PIGMENT MATERIAL CODES

1 -- Basic lead carbonate
9 -- Sublimed white lead (lead sulfate plus lead monohydroxide) for spec. work
18 -- Basic white lead carbonate
BW 102 -- white lead carbonate
BW 103 -- white lead carbonate
BW 104 -- white lead carbonate
BW 106 -- refined leaded zinc
315 -- Sublimed blue lead for spec work
411 -- Leaded zinc oxide
412 -- Leaded zinc oxide
414 -- Leaded zinc oxide
415 -- Leaded zinc oxide
511 -- Leaded zinc oxide
535 -- off-color white lead carbonate
1140 -- ODP dry white lead
1151 -- white lead carbonate
1412 -- leaded zinc oxide
1424 -- leaded zinc oxide
1526 -- leaded zinc oxide
68A4 -- white lead carbonate
68C4 -- leaded zinc oxide
68C6 -- leaded zinc oxide
6801 -- silicate white lead [6800-09: basic lead carbonate and lead silicate]
6805 -- basic lead carbonate
6810 -- sublimed white lead [6810-19: basic lead sulfate]
6815 -- sublimed blue lead
6822 -- leaded zinc oxide [6820-49: leaded zinc oxide]
6828 -- leaded zinc oxide
6829 -- leaded zinc oxide
6840 -- leaded zinc oxide
6841 -- leaded zinc oxide
6842 -- leaded zinc oxide
6845 -- leaded zinc oxide
6846 -- leaded zinc oxide

RESIDENTIAL PAINTS WITH ANY AMOUNT OF LEAD PIGMENT¹

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
AVM*	2-1	Medium Vermilion in Oil for Fountain City Novelty Company	412	22	6/3/51
B-1*	7-5	Rustic Shingle Stain, light green	412	3	4/5/51
A2AAH	1A1	SWP, gray "sedge green" for Chattanooga Housing Authority	6829	345	3/5/51
A2AAH	1	SWP, gray "sedge green" for Chattanooga Housing Authority	6829	345	6/5/51
8	3 4	American White	412 (d) 412 (d)	535 535	5/3/51
9	3 4	P.C.P. White	412	238	3/5/51
ML-12	1	Metalife Gray	412	458	8/5/51
A2W4	9Y1	SWP, gloss white	682900	345	7/5/51
A2W4	9C1	SWP, gloss white	682900	345	5/5/51
A2W4	8N2	SWP, gloss white	682900	345	5/5/51
A2W4	10	SWP, gloss white	682200	300	8/5/51

¹ The information in this chart was compiled from a review of available formula cards. Because the formula cards are 30 to 70 years old, the formula cards still in existence are in today, and the accuracy of the formula cards cannot be verified. The existence of a formula card does not mean that a paint was produced and sold during any particular time. The information written on the formula cards, which in some instances may be ambiguous or subject to further interpretation.

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
A2W4	9	SWP, gloss white	682900	345	4-2
51	16A 16 17 20	Porch and deck paint, dark slate	BW 102 413 or 1526 414 BW 102	205 450 400 57	7/1 9/1 10/1 12/1
51	10 13	Porch and deck paint, dark slate	1526 1526 or 413	450 450	11/1 8/2
52	5 8A 9	Porch and deck paint, extra dark slate	1526 or 413 BW 102 414, BW 102	450 205 400, 57	8/2 9/1 10/1
52	2	Porch and deck paint, extra dark slate	1526	450	11/1
53	20	Porch and deck paint, lead color	412	500	9/2
53	19	Porch and deck paint, lead color	414 BW 103	440 77	7/1
53	18	Porch and deck paint, lead color	413	500	2/1
53	10 13	Porch and deck paint, lead color	414, BW 102	400, 57	10/1 12/1
53	3 6 4A	Porch and deck paint, lead color	1526 1526 or 413 BW 102	450 450 205	11/1 8/2 9/1
BS60*	3	Brick and Stucco, white for T/G	412	500	7/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
BS60*	2 Alt A-2 2 Alt A	Brick and Stucco, white for T/G	412	760	4/11/11
BS60*	1 Alt A	Brick and Stucco, white	412 18	380 134	11/11/11
BS61*	1	Brick and Stucco Paint, Ivory	412	760	12/11/11
69	27	Porch and deck paint, dark gray	412	500	9/11/11
69	25	Porch and deck paint, dark gray	413 414 BW103	500 440 77	2/11/11 7/11/11
69	16 17	Porch and deck paint, dark gray	413 or 1526 414 BW102	500 440 68	2/11/11 9/11/11
69	10 13 16A	Porch and deck paint, dark gray	1526 1526 or 413 BW102	500 500 233	11/11/11 8/11/11 9/11/11
71	1	Porch and deck paint, dark brown for S.W. Company	1526	92	7/11/11
BS74*	1	Brick and Stucco, cream	412 or 511	760 296	11/11/11
114	3	Galvatex	412	800	3/11/11
114	2-1	Galvatex	511 or 412	490 800	3/11/11 3/11/11
114	1 Alt A	Galvatex	511	490	9/11/11

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
184	5	Exterior paste paint #84, white	Parallel to 466		6/
184	4	Exterior paste paint #84, white	414W 18	450 100	05/
184	1	Exterior paste paint #84, white	414	525	7/
299	6	Family Paint, light lead	411B or 1526	490	7/
	7 (temporary ID)		411B or 1526	490	2/
300	25	Family Paint, outside, white	412	150	9/
300	16	Family Paint, outside, white	1526	150	7/
	20		1526	110	(6/17/43) : du
	21				8/
300	11	Family Paint, outside, white	511	200	4/
	13		412	102	2/
300	9 Alt A	Family Paint, outside, white	106	330	11/
	9		412D	200	11/
301*	2-1	Sultana House Paint, light green	412	285	5/
					12/
301*	2 Alt A	Sultana House Paint, light green	1411 18	247 38	10/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
304*	8-7	Sultana House Paint, pea green	18	76	4/2 3/2
300	6	Family Paint, yellow	1526	150	2/26/36 11
	5		1526	150	
305*	1	Sultana House Paint, light brown	412	85	12/
307*	18-17	Sultana Paint, medium gray	412	285	5/1 12/
307*	16	Sultana Paint, medium gray	412	142	2/
307*	15	Sultana Paint, medium gray	412, 511 or 414	142 71	4/
307*	15 Alt A	Sultana Paint, medium gray	412	142	9/
307*	14	Sultana Paint, medium gray	412 or 511	94 47	1/
307*	13	Sultana Paint, medium gray	412 18	94 57	4/2
307*	11	Sultana Paint, medium gray	413 18	94 57	10/
307*	9-7	Sultana Paint, medium gray	18	79	1/2 3/2
307*	8 Alt A	Sultana Paint, medium gray	1411 18	847 38	10/

* All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PE: 1001175v3

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
307	5 8	Family Paint, french gray	411 B or 1526 411 B or 1526	490 490	7/1 6/1
310	5 6 7	Family Paint, dark blue	1526	115	11/1 2/2 12/1
317*	7-6	Sultana House Paint, light salmon	18	76	4/2 3/2
317	6	Family Paint, cream	414, BW102	435, 70	7/1
317	3 5	Family Paint, cream	1526 414, BW102	495 350, 70	10/1 10/1
317	2	Family Paint, cream	412	495	11/1
319*	22-21	Sultana House Paint, light green	6829 902C	288 15	1/2 8/1
319*	20	Sultana House Paint, light green	68C6 902C	288 15	1/2
319*	19-18	Sultana House Paint, light green	412	288	1/2 11/1
319*	17	Sultana House Paint, light green	412	285	5/1
319*	17 Alt A	Sultana House Paint, light green	1411 18	247 38	10/1
319*	16	Sultana House Paint, light green	18	34	2/1
319*	15	Sultana House Paint, light green	412	142	2/1
319*	14 Alt A	Sultana House Paint, light green	412	142	9-1
319*	13	Sultana House Paint, light green	18	79	6-1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
319*	12-8	Sultana House Paint, light green	18	62	1/2
319	3 5 Alt A 6	Family Paint, silver gray	411 1526 414 BW103	490 390 346 68	7/1 10/ 11/
320	6 6 7	Family Paint, light ivory	414 BW102 (1140) 414 BW102 414 BW102	346 168 432 68 432 68	10/ 11/ 7/
320	2 5 Alt A	Family Paint, light ivory	1526 1526/414	490 390	11/ 10/
321*	2-1	Sultana House Paint, brown	412	58	10/ 3/2
321*	14	Sultana House Paint, brown	412	95	5/1
321*	13 Alt A 13	Sultana House Paint, brown	412	95	2/2
321*	12 Alt A	Sultana House Paint, brown	412 or 414	95	9/1
321	5 8	Family paint, sky blue	1526 414	210 210	11/ 10/
323	5 7	Family paint, buff	1526 1526/414	195 195	11/ 6/
324	7 6	Family paint, ash gray	411B or 1526	490	2/2 7/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
325	6	Family Paint, straw	1526	490	11/
325	10	Family Paint, straw	414 BW102	346 168	10/
325	10 (duplicate 11) 11	Family Paint, straw	414 BW102 414 BW102	432 68 432 68	11/ 7/
326	5 (duplicate)	Family Paint, green	414 BW102	380 58	11/
326	6 Alt A	Family Paint, green	414 BW102	270 46	8/2
326	6	Family Paint, green	see 5 duplicate	380 58	7/
326	2 5	Family Paint, green	411B or 1526 414 BW102	430 304 147	7/ 10/
327	9	Family Paint, pea green	414 BW102	346 168	10/
327	9 (duplicate)	Family Paint, pea green	414 BW102	432 68	11/
327	5 8 Alt A 8 Alt B	Family Paint, pea green	1526 1526/414 1526/414	490 390 390	11/ 10/ 9/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
344*	10-8	Sultana House Paint, fawn	18	39	1/2 3/2
350*	15	Sultana House Paint, ceiling blue	412 or 511	142 71	4/
350*	15 Alt A	Sultana House Paint, ceiling blue	412	142	9/
350*	14	Sultana House Paint, ceiling blue	412 or 511 18	94 47 57	1/
350*	13	Sultana House Paint, ceiling blue	412 18	94 57	4/2
350*	12	Sultana House Paint, ceiling blue	413 18	94 57	10/
350	6 8	SWP, Interior Flat White	412 1526	1090 500	11/1 1/
350*	2	Sultana House Paint, ceiling blue	412	150	6/
350*	1	Sultana House Paint, ceiling blue	412	110	3/2
351	9N (Newark only) 10 11	SWP, #351, stone	1526 1526 1526	650 720 638	3/2 3/2 6/
352	1	SWP, #352, geneva cream	412 BW102	438 113	4/
353	21	SWP, #353, light lead	414 BW102	400 225	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
353	20	SWP, #353, light lead	1526 BW102-58	490 93	1/1
353	20 Alt B	SWP, #353, light lead	414 BW102	402 628	10/
353	20 Alt A	SWP, #353, light lead	1526 BW102	570 432	10/
353	19	SWP, #353, light lead	1526 BW102	420 607	9/2
353	17	SWP, #353, light lead	1526 BW102	490 92	5/
353	13	SWP, #353, light lead	1526 BW104	490 92	10/
353	12	SWP, #353, light lead	1526 BW104	678 238	5/2
353	11	SWP, #353, light lead	1526 412 BW104	238 406 278	5/2
353	10	SWP, #353, light lead	1526 412 BW102/104	256 480 400	3/
353	9N (Newark only)	SWP, #353, light lead	1526 1140 or BW104	650 170 or 197	3/2 5/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PL: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
354	10 N (Newark) 11	SWP, #354, sea green	1526 1526 412 BW102/104	650 256 480 400	3/1 3/1
355	11	SWP, #355, sage green	1526 BW102/103 or 104	720 250	3/1
355	10 (Newark)	SWP, #355, sage green	1526 and BW104 or 1526 1140	565 155 565 135	3/1 7/1
357	22	SWP, #357, silver gray	414 BW102	400 225	1/1
357	21 Alt A 21	SWP, #357, silver gray	1526 BW102 1526 BW102	570 410 490 93	10/1 1/1
357	20 Alt A 21 Alt B	SWP, #357, silver gray	BW102 BW102	792 604	9/1 10/1
357	20	SWP, #357, silver gray	1526 BW102	420 585	9/1
357	19	SWP, #357, silver gray	1526 BW102	490 93	7/1
357	14	SWP, #357, silver gray	1526 BW104	490 92	10/1
357	13	SWP, #357, silver gray	1526 BW104	678 238	5/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PE 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
357	12	SWP, #357, silver gray	1526 412 BW104	238 406 278	5
357	11	SWP, #357, silver gray	1526 412 BW102/104	256 480 400	3
357	10 N (Newark) 10	SWP, #357, silver gray	1526 BW104 1526 1140	225 305 226 260	3 5
359	1	SWP, #359, berkely yellow	412 BW102	438 113	4
360	19 20	SWP, #360, cream gray	413 or 412	440	1
360	12 16	SWP, #360, cream gray	1526 BW104	490 92	1
360	11 Alt A	SWP, #360, cream gray	413 BW104	590 280	6
360	11	SWP, #360, cream gray	1526 BW104	638 224	
360	10	SWP, #360, cream gray	1526 BW102/(104)	720 224	3
360	9N (Newark) 9	SWP, #360, cream gray	1526 BW 104 or 1526 1140	650 197 650 170	3 5

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
360*	4	Sultana Paint, outside white	412	100 23	5/
360*	4 Alt A	Sultana Paint, outside white	1411 18	87 13	10/
360*	2	Sultana Paint, outside white	412	150	2/
360*	1	Sultana Paint, outside white	412	150	4/
362	14 Alt A	SWP, #362, French crown green	412	50	1/
362	13 Alt A	SWP, #362, French crown green	412 or 414	112	3/
362	11	SWP, #362, French crown green	1415 (zinc oxide) or 414 or 1085	25	11/
362	10	SWP, #362, French crown green	412 only if 1085 unavailable	25	8/
363	29	SWP, #363, slate	412 BW102	400 82	4/
363	28 Alt A	SWP, #363, slate	412 BW102	450 82	2/
363	28	SWP, #363, slate	412 BW102	480 82	2/
363	27	SWP, #363, slate	412 or BW102 414 and 511(ZnO) BW102	380 113 190 (190) 113	9/
363	26	SWP, #363, slate	414 BW102	305 220	6/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
363	25	SWP, #363, slate	413 BW102	410 100	4
363	24 Alt B	SWP, #363, slate	413 BW102 1526 BW102	410 99 445 58	12
363	24 Alt A	SWP, #363, slate	413 BW102	438 113	10
363	24 Alt C	SWP, #363, slate	413 BW102	570 432	1
363	24	SWP, #363, slate	1526 BW102	475 70	7
363	23	SWP, #363, slate	1526 BW102	475 70	5
363	22	SWP, #363, slate	414 W BW102	370 170	3
363	20	SWP, #363, slate	414 BW102	400 225	2
363	19 Alt B	SWP, #363, slate	414 BW102	402 628	10
363	19 Alt A	SWP, #363, slate	1526 BW102	570 432	10
363	18 Alt A	SWP, #363, slate	BW102	815	9
363	19	SWP, #363, slate	1526 BW102	490 93	1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of C
363	18	SWP, #363, slate	1526 BW102	420 607	9/22/4
363	16	SWP, #363, slate	1526 BW102	490 92	5/7/4
363	12	SWP, #363, slate	1526 BW104	490 92	10/8/3
363	11	SWP, #363, slate	1526 BW104	638 224	6/6/3
363	10	SWP, #363, slate	1526 BW102 (BW104)	720 224	3/25/3
363	9 N and 9	SWP, #363, slate	1526 BW104 1526 1140	650 197 650 170	3/26/3 5/16/3
363*	1	Gibbsboro House Paint, pearl blue	412	110	3/25/3
367	10 12	SWP, #367, red	1415/412	25	1/4/4 3/27/5
367	8 10	SWP, #367, red	1415 (412)	25	10/10/ 1/4/4
369	13 Alt A	SWP, light blue	1526 414	375 375	10/27/
369	10	SWP, light blue	1526	750	10/4/3
369	9	SWP, light blue	1526 412	450 300	7/7/3

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
370	1	SWP, chelsea gray	412 BW102	438 113	4
371	1	SWP, charleston white	414W BW102	400 295	2
374	1	SWP, westchester gray	412 BW102	380 113	4
375	28	SWP, colonial yellow	414 BW102	390 220	6
375	26	SWP, colonial yellow	1526 BW102	475 70	5
375	25	SWP, colonial yellow	414W BW102	370 170	3
375	23	SWP, colonial yellow	414W BW102	400 225	1
375	22 Alt A	SWP, colonial yellow	1526 BW102	570 410	10
375	22	SWP, colonial yellow	1526 BW102	490 93	1
375	21	SWP, colonial yellow	1526 BW102	420 585	9
375	21 Alt A	SWP, colonial yellow	BW102	792	9
375	21 Alt B	SWP, colonial yellow	414 BW102	403 604	Emerge 10

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Pl: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
375	15	SWP, colonial yellow	1526	490	10/
	19		BW104/BW102	92	5/
375	14	SWP, colonial yellow	1526	678	5/
			BW104	238	
375	13	SWP, colonial yellow	1526	238	5/
			412	406	
375	12	SWP, colonial yellow	1526	256	3/
			412	480	
			BW102 (104)	400	
375	11	SWP, colonial yellow	1526	700	10/
			BW104	270	
375	11 N and 11 duplicate	SWP, colonial yellow	1526	700	5/
			1140	230	
379*	18-17	Sultana House Paint, deep cream	412	287	5/
					9/
					12/
379*	10-8	Sultana House Paint, deep cream	18	79	1/
					3/
379*	18 Alt A	Sultana House Paint, deep cream	1411	247	10/
			18	38	
379*	16	Sultana House Paint, deep cream	412	142	2/
379*	15	Sultana House Paint, deep cream	412 or	142	4/
			511	71	

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PE 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
379*	15 Alt A	Sultana House Paint, deep cream	412 4230	142 20	9/1
379*	14	Sultana House Paint, deep cream	412 or 511 18	94 47 57	1/0
379*	13	Sultana House Paint, deep cream	412 18	94 57	4/2
379*	12	Sultana House Paint, deep cream	413 18	94 57	10/
379	1	SWP, cape cod green	412	650	4/1
380	1	SWP, manor brown	412	80	4/1
383*	19-18	Sultana House Paint, ivory	412	285	5/1 12/
383*	9-7	Sultana House Paint, ivory (Dura-mix)	18	88	1/2 3/2
383*	5-2	Sultana House Paint, ivory	412	150	8/1 10/
383	21	SWP, #383, pea green	412 (6840) 1424 (6822)	275 150	1/
383	20	SWP, #383, pea green	412 1424	275 150	7/2
383*	19 Alt A	Sultana Paint, ivory	1411 18	247 38	10/
383*	17	Sultana Paint, ivory	412	142	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

1: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
383	17	SWP, #383, pea green	1425 or 1424	254	7/2
	18		1424	254	8/1
			6845	163	
383*	16	Sultana Paint, ivory	18 4230	88 16	7/2
383*	16 Alt A	Sultana Paint, ivory	412	142	9/1
383*	15	Sultana Paint, ivory	18	88	4/1
383*	14	Sultana Paint, ivory	412 or 511	142 71	4/1
383*	13	Sultana Paint, ivory	412 or 511 18	94 47 57	1/1
383	12	SWP, #383, pea green	1526 or 412 or 413	600	1/1
383*	12	Sultana Paint, ivory	18 412	57 94	4/2
383*	11	Sultana Paint, ivory	413 18	94 57	10/1
383	7N 8 11	SWP, #383, pea green	1526 1526 1526	525 550 600	3/2 1/1 7/2
383*	1	Sultana Paint, ivory	412(E)	114	3/2
384*	19-18	Sultana Paint, buff	412 12310	285 15	5/1
384*	10-8	Sultana Paint, buff	18	76	1/2 3/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
384*	19 Alt A	Sultana Paint, buff	1411 18	247 38	10/
384*	17	Sultana Paint, buff	412	142	12/
384*	16	Sultana Paint, buff	18	88	12/
384*	16 Alt A	Sultana Paint, buff	412	142	9/
384*	15	Sultana Paint, buff	412 or 511	142 71	4/
384*	14	Sultana Paint, buff	412 or 511 18	94 47 57	1/
384*	13	Sultana Paint, buff	412 18	94 57	4/
384*	11	Sultana Paint, buff	413 18	94 57	10/
385	18	SWP, #385, straw	1526 BW102	478 91	7/
385	13	SWP, #385, straw	1526	478	1/
385	12	SWP, #385, straw	1526	638	6/
385	10	SWP, #385, straw	1526	720	4/
385	9 N	SWP, #385, straw	1526	605	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
386*	1	Sultana Paint, turquoise	6829	285	5/2
387	24	SWP, #387, canary yellow	1526 BW102	475 70	5/2
387	23	SWP, #387, canary yellow	414 BW102	370 170	3/2
387	21	SWP, #387, canary yellow	414W BW102	400 225	1/2
387	20	SWP, #387, canary yellow	BW102 1526	93 490	1/2
387	19	SWP, #387, canary yellow	1526 BW102	420 585	9/2
387	13	SWP, #387, canary yellow	1526	490	10/2
387	12	SWP, #387, canary yellow	412 or (413)	662	6/2
387	11	SWP, #387, canary yellow	1526 412 BW102	256 480 400	3/2
387	10 N	SWP, #387, canary yellow	412D	725	3/2
388	9	SWP, #388, modern brown	1085 (ZnO only 412 if 1085 not available)	25	8/2
	10		1415 or (1085 or 414)	25	11/2
388	6 8	SWP, #388, modern brown	1415/412	25	11/2 9/2
388*	1	Sultana House Paint, Nile green	412(E)	114	3/2
391	9	SWP, #391, Quaker drab	1526	720	3/2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
391	8 N (Newark only)	SWP, #391, Quaker drab	1526	600	3/2
392*	7	Dura-Mix House Paint, French gray	18	44	1/1
393	17 Alt B	SWP, #393, tobacco brown	412	25	6/1
393	15	SWP, #393, tobacco brown	414	60	11/1
	16		1526 or 413	60	7/1
	17		1526 or 413	60	2/1
	17				
393	11	SWP, #393, tobacco brown	1526	140	6/1
	12		1526 (414)	130	9/1
	13		414	80	5/1
393	9	SWP, #393, tobacco brown	1526	100	11/1
	10		1526	114	1/2
394	8 N (Newark only)	SWP, #394, primrose yellow	1526	720	3/1
	10		1526	638	6/1
	12		412	330	7/1
396*	10-8	Sultana Paint, azura	18	85	1/1 3/1
396*	7-3	Sultana Paint, azura	412	145	8/1 5/1
396*	14	Sultana Paint, azura	412	285	5/1
396*	13	Sultana Paint, azura	18	35	5/1
396*	12	Sultana Paint, azura	412	142	2/1
396*	2	Sultana Paint, azura	412(E)	150	6/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
401	4	Commonwealth Paint, yellow	1526	148	11/
404	4	Commonwealth Paint, orange yellow	1526	24	11/
	5		414	24	2/
416	17	Trimbrite SWP, Ardmore green	6805	4	10/
416	10	Trimbrite SWP, Ardmore green	412	150	3/
416	8	Trimbrite SWP, Ardmore green	same as card 5 414 and zinc oxide or 412	40 100	4/
416	6	Trimbrite SWP, Ardmore green	412	100	2/
416	5	Trimbrite SWP, Ardmore green	414 and zinc oxide or 412	40 100	2/
416	4 Alt A	Trimbrite SWP, Ardmore green	412	150	4/
416	4	Trimbrite SWP, Ardmore green	412	100	11/
416	3 Alt A	Trimbrite SWP, Ardmore green	412	150	4/
416	2	Trimbrite SWP, Ardmore green	412	150	1/
416	2 Alt A 3	Trimbrite SWP, Ardmore green	412	100	3/
					6/
416	1	Trimbrite SWP, Ardmore green	412	50	8/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
417	17	SWP, green	6805	4	9/
418	12 13	SWP, Solfast red	6805 6805	3 4	9/ 10/
420	10	SWP, gray	412/6840 1424/6822	300 100	10/
420	6	SWP, gray	412 6802 or 1424	300 100	4/
420	5	SWP, gray	412 or 413	440	2/
420	4	SWP, gray	412 or 413 1424 or 6828	350 50	1/
420	3	SWP, gray	412 or 413 1424 or 1412	350 50	1/
420	2	SWP, gray	412 or 413 1424 or 1412	350 50	12/
420	1	SWP, gray	412	440	10/
421	5 9	SWP, sage green	412 6840/412	330 330	10/ 10/
421	3	SWP, sage green	412	330	1/
421	1	SWP, sage green	412	330	10/
422	1 11	SWP, sage dark	412	300	10/
433	3	PCP Paste, #33, light buff	1526	228	11/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
446	3	PCP Paste, cream SW Co.	1526	228	11/
450	51 58	SWP, undercoater, wood	6805	175	12/
450	44	SWP, undercoater, wood	6801	230	10/
450	40	SWP, undercoater, wood	6801	230	7/
450	38	SWP, undercoater, wood	6801 1424 or 6828	150 114	6/
450	37 Alt A	SWP, undercoater, wood	6801 511	150 114	8/
450	36	SWP, undercoater, wood	6801 1424	150 114	6/
450	35	SWP, undercoater, wood	68A1 1424	150 114	5/
450	31 34	SWP, undercoater, wood	511 and 18 or 412 and 18	240, 120 or 185, 175	11/
450	30	SWP, undercoater, wood	511 and 18 zinc oxide or 2059 and 18	240, 120 or 120, 240	8/
450	25 27	SWP, undercoater, wood	511, 18 511, 18	240, 238 240, 120	4/
450	24	SWP, undercoater, wood	412 18	144 386	8/
450	22	SWP, undercoater, wood	414 BW102	110 490	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PH: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
450	21 Alt A	SWP, undercoater, wood	412 BW 102 or 18	144 450 or 386	1/
450	21	SWP, undercoater, wood	414 BW102 or 18	110 490 or 420	1/
450	20	SWP, undercoater, wood	412 or 511, 414	144 72, 72	9/
450	20 Alt A	SWP, undercoater, wood	BW 102	509	11
450	19	SWP, undercoater, wood	414 BW 102	120 497	8/
450	18 Alt A	SWP, undercoater, wood	412 BW 102	150 405	3/
450	18 Alt B	SWP, undercoater, wood	413 BW 102	154 438	3/
450	18	SWP, undercoater, wood	413 BW 102	144 450	10
450	16	SWP, undercoater, wood	1526 BW102	156 436	7/
450	15	SWP, undercoater, wood	1526 BW 102	156 436	4/
450	14	SWP, undercoater, wood	414 BW 102	110 490	9/
450	13	SWP, undercoater, wood	1526 BW 102	235 345	7/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
450	12	SWP, undercoater, wood	414 BW 102	218 575	1/
450	11	SWP, undercoater, wood	414 BW 102	185 648	10/
450	10	SWP, undercoater, wood	1526 BW 102	162 675	9/
450	9	SWP, undercoater, wood	1526 BW 102	162 605	7/
450	8	SWP, undercoater, wood	1526 BW 102	162 513	6/
450	7	SWP, undercoater, wood	1526 BW 102	250 467	4/
450	5	SWP, undercoater, wood	1526 BW104	300 410	10/
450	3	SWP, undercoater, wood	412 BW 104	300 410	10/
450	2	SWP, undercoater, wood	412 BW 104	300 410	8/
450	1	SWP, undercoater, wood	412 BW 104	300 410	7/
451	7	SWP - undercoater mildew resistant	6805	175	2/
451	5	SWP - undercoater mildew resistant	6801 1424	150 114	9/
451	4	SWP - undercoater mildew resistant	18 511	120 240	1/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
451	2	SWP - undercoater mildew resistant	18 511	120 240	6/
451	1	SWP - undercoater mildew resistant	414 W BW 103	160 450	8/
458	22	SWP, Plymouth green	68C6	345	8/
458	21	SWP, Plymouth green	6840 6822	300 100	7/
458	15	SWP, Plymouth green	412 68C2 or 6828 or 1424	300 100	4/
458	14	SWP, Plymouth green	412 or 413 1424 or 6828 or 1412	350 50	2/
458	11	SWP, Plymouth green	412 or 413 1424 or 1412	350 50	12
458	4 Alt B 5	SWP, Plymouth green	412 413 or 412	650 440	9/ 10
458	4 Alt A	SWP, Plymouth green	414 18	480 169	7/
458	1	SWP, Plymouth green	412	650	8/
459	23	SWP, Berkley yellow	68C6	345	8/
459	21	SWP, Berkley yellow	6840 = 412 6822 = 1424	300 100	6/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
459	16	SWP, Berkley yellow	412 or 413 6802 or 1424 or 6828	300 100	4/
459	15	SWP, Berkley yellow	412 or 413	440	2/
459	14	SWP, Berkley yellow	412 or 413 1424 or 6828 or 1412	350 50	1/
459	13	SWP, Berkley yellow	412 or 413 1424 or 1412	350 50	1/
459	8	SWP, Berkley yellow	413 or 412	440	8/
459	6	SWP, Berkley yellow	414 or 511 412	175, 265 440	1/
459	5	SWP, Berkley yellow	414 511 18	254 165 70	4/
459	4	SWP, Berkley yellow	412 18	400 70	7/
459	4 Alt C 4 Alt D 4 Alt E	SWP, Berkley yellow	see card 4 see 4 Alt A see card 4	see card 4 see 4 Alt A see card 4	9/ 9/ 9/
459	4 Alt A 4 Alt B	SWP, Berkley yellow	414 18 see card 4	295 175 see card 4	8/
459	3	SWP, Berkley yellow	414 BW102	400 82	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PF: 100E175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
459	3 Alt B	SWP, Berkley yellow	414 BW 102	306 191	3/2
459	3 Alt C	SWP, Berkley yellow	414 BW 102	413 317	4/
459	2	SWP, Berkley yellow	412 BW 102	400 82	2/
459	2 Alt B	SWP, Berkley yellow	412 BW 102	540 169	2/
459	1	SWP, Berkley yellow	412 BW 102	400 82	8/2
459	1 Alt A	SWP, Berkley yellow	BW 102	245	11/
459	1 Alt C	SWP, Berkley yellow	BW 102 18	82 140	11/
460	7 8 12	SWP, apple green	1526 1526	640 700	9/2 9/
460	6 7	SWP, Winthrop Red	6805	4	11/
461	13	SWP, Willow green	412	25	2/
461	8	SWP, Willow green	412	25	9/
462	30	SWP, cream	412	400	4/
462	29	SWP, cream	412	450	2/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
462	28	SWP, cream	412 or 511	380 or 190	9/
462	26	SWP, cream	413 or 412	410	4/
462	25 Alt C	SWP, cream	413	525	1/
462	25 Alt B	SWP, cream	413	410	12
462	25 Alt A	SWP, cream	413	438	10
462	12	SWP, cream	412 or 413	662	6/
462	11	SWP, cream	412	480	3/
462	10	SWP, cream	412	460	11
462	9	SWP, cream	412	460	5/
465	25	SWP, Colonial yellow	412 1424	300 100	7/
465	24	SWP, Colonial yellow	412 1424	300 100	6/
465	23	SWP, Colonial yellow	412 1424	300 100	10
465	22	SWP, Colonial yellow	412 1424	300 100	9/
465	21	SWP, Colonial yellow	412 or 413 1424	300 100	6/
465	20	SWP, Colonial yellow	412 or 413 1424	300 100	4/
465	19 18	SWP, Colonial yellow	412 or 413 1424	300 100	10 6/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
465	19 Alt A	SWP, Colonial yellow	412 or 413 1424	300 100	3/
465	17	SWP, Colonial yellow	412 or 413 1424	300 100	4/
465	16	SWP, Colonial yellow	412 or 413	440	2/
465	15-13	SWP, Colonial yellow	412 or 413 1424 or 1412	350 50	1/
465	12, 11, 10	SWP, Colonial yellow	412 or 413	440	5/
465	9	SWP, Colonial yellow	412 or 413	440	3/
465	8, 7	SWP, Colonial yellow	511 412	265 440	12/
465	6	SWP, Colonial yellow	511	215	1/
465	5	SWP, Colonial yellow	511	163	4/
465	4, 4 Alt E, 4, Alt C	SWP, Colonial yellow	412 18	400 70	7/
465	4 Alt A 4 Alt D	SWP, Colonial yellow	18	175	9/
465	4 Alt B	SWP, Colonial yellow	412 18	400 70	9/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PL 1901175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
465	3	SWP, Colonial yellow	412	400	2/
465	3 Alt A	SWP, Colonial yellow	412	540	2/
465	2	SWP, Colonial yellow	412	400	2/
465	2 Alt B	SWP, Colonial yellow	412	540	2/
465	2 Alt A	SWP, Colonial yellow	412	400	2/
465	1	SWP, Colonial yellow	412	400	8/
465	1 Alt C	SWP, Colonial yellow	18	140	11
466	5	Painter Paste Paint, White #66	18	100	6/
466	3, 2	Painter Paste Paint, White #66	412 18	728 118	10/ 12/
466	1	Painter Paste Paint, White #66	412 18	728 116	8/
470	30, 29	SWP, Golden Yellow	412 1424	300 100	10/ 7/
470	28 Alt A 28 27	SWP, Golden Yellow	18 412	70 385	3/ 10/ 6/
470	26 25	SWP, Golden Yellow	18 412	70 385	3/ 3/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
470	24	SWP, Golden Yellow	18 412	70 385	12
470	23	SWP, Golden Yellow	18 412	70 385	12
471	78 77 76	SWP, Gloss, White	412 1424	300 100	6 6 3
471	75 72	SWP, Gloss, White	412 1424	325 100	10 8
471	74	SWP, Gloss, White	412 1424	325 100	8
471	74 Alt A	SWP, Gloss, White	412 1424	300 100	10
471	73	SWP, Gloss, White	412 1424	325 100	8
471	71, 71 Alt F-1	SWP, Gloss, White	412 1424	325 100	5 7
471	70 Alt A 70 69	SWP, Gloss, White	412 1424	300 100	3 1 (date)
471	68 Alt A 68 67 Alt A	SWP, Gloss, White	412 1424	300 100	10 10 6
471	67 66 Alt B 66 Alt A	SWP, Gloss, White	412 1424	300 100	6 3 3

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Pl: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	66 65 Alt B	SWP, Gloss, White	412 1424	300 100	3/ 3/
471	65 64	SWP, Gloss, White	412 1424	200 200	2/ 1/
471	65 Alt A	SWP, Gloss, White	412 1424	200 200	1/
471	63 62	SWP, Gloss, White	1411 or 412 1412 or 1424	400 200 200	1/ 8/
471	61 60	SWP, Gloss, White	1411 or 412 1412 or 1424	400 200 200	4/ 11/
471	59 58	SWP, Gloss, White	412	200	9/
471	59 Alt A	SWP, Gloss, White	412	475	9/
471	59 Alt C	SWP, Gloss, White	1411	425	9/
471	59 Alt B	SWP, Gloss, White	413 18	200 25	9/
471	58 Alt A	SWP, Gloss, White	412	475	8/
471	57 56	SWP, Gloss, White	412	475	8/
471	55 54	SWP, Gloss, White	412	200	4/

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Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	53 52 51	SWP, Gloss, White	412 or 511	475 290	3/8 2/8 1/8
471	50	SWP, Gloss, White	412	300	11/8
471	49	SWP, Gloss, White	511 or 412 18	275 450 60	4/8
471	48	SWP, Gloss, White	412 18	450 60	2/8
471	48 Alt A	SWP, Gloss, White	18	178	2/8
471	47 Alt B 47	SWP, Gloss, White	412 18	480 70	9/8 7/8
471	47 Alt C	SWP, Gloss, White	18	195	9/8
471	47 Alt A	SWP, Gloss, White	18	195	7/8
471	46	SWP, Gloss, White	511 18	300 70	4/8
471	46 Alt A	SWP, Gloss, White	511 18	365 70	4/8
471	45 45 Alt A	SWP, Gloss, White	412 18	509 159	3/8
471	44	SWP, Gloss, White	412 18	509 159	1/8

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	43 42	SWP, Gloss, White	412 18	480 70	6/1 9/1
471	43 Alt B	SWP, Gloss, White	511 18	300 70	6/1
471	43 Alt A	SWP, Gloss, White	18	238	6/1
471	42 Alt A	SWP, Gloss, White	18	238	10/1
471	41 Alt B 41 Alt A 41	SWP, Gloss, White	412 18	480 70	1/1
471	40 Alt A 40	SWP, Gloss, White	412 18	400 128	9/2 9/1
471	40 Alt B	SWP, Gloss, White	412 18	400 128	9/2
471	39	SWP, Gloss, White	18	257	6/1 1/2
471	38	SWP, Gloss, White	412 18	490 128	10/1
471	38 Alt A	SWP, Gloss, White	412 18	490 128	9/2
471	38 Alt C	SWP, Gloss, White	412 18	490 129	3/1
471	38 Alt B	SWP, Gloss, White	18	206	1/2
471	37	SWP, Gloss, White	412 18	490 128	8/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	37 Alt B	SWP, Gloss, White	412 BW 102	490 150	9/2
471	36 Alt A	SWP, Gloss, White	412 18	490 150	7/2
471	36	SWP, gloss white	412 18	490 128	7/2
471	35	SWP, gloss white	412 18	490 128	10/
471	34	SWP, gloss white	412 18	225 236	4/
471	33	SWP, gloss white	412 18	392 372	1/
471	32	SWP, gloss white	412 18	590 370	1/
471	31 29	SWP, gloss white	412 BW 102	470 526	12/ 9/2
471	30	SWP, gloss white	412 18	500 350	10/
471	28	SWP, gloss white	412 BW 102	470 350	7/
471	27 26	SWP, gloss white	BW 102 412	220 470	5/ 7/
471	25 24 23	SWP, gloss white	BW 102 412	220 470	4/ 1/ 9/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
471	23	SWP, gloss white	412 BW 102	470 220	9/
471	22	SWP, gloss white	412 BW 102	500 384	7/
471	21 20 19	SWP, gloss white	412 BW 102	500 387	4/ 6/ 5/
471	18	SWP, gloss white	412 BW 102	525 460	12/
471	17 16	SWP, gloss white	412 18	525 400	9/ 5/
472	10, 9, 8 Alt A	SWP, Mildew Resisting, White	412 18	450 60	10/ 6/ 3/
472	8 7 6	SWP, Mildew Resisting, White	412 18	450 60	10/ 6/ 5/
472	4 3	SWP, Mildew Resisting, White	412 18	450 60	1/ 3/
472	2	SWP, Mildew Resisting, White	412 18	450 60	6/
472	1	SWP, Mildew Resisting, White	412	470	8/
473	11 10 9	SWP, tinting white	412 1424	300 100	7/ 6/ 11/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
473	8 7 6 Alt A	SWP, tinting white	412 1424	300 100	6/5/4
473	6 5 Alt A 5	SWP, tinting	412 1424	300 100	4/3/10
473	4 3	SWP, tinting	412 1424	300 100	6/4/4
473	2 1	SWP, Tinting white	412 1424	200 200	10/8/8
474	25 24	SWP, Chelsea Gray	412 1424	300 100	7/6/6
474	23 22 21 20 Alt A	SWP, Chelsea Gray	412 or 413 1424	300 100	10/6/6/3
474	20 19 18 17	SWP, Chelsea Gray	412 or 413 68C2 or 1424 or 6828	300 100	10/7/6/4
474	16	SWP, Chelsea Gray	412 or 413	440	2/2/2
474	15 14 13	SWP, Chelsea Gray	412 or 413 1424 or 1412	350 50	1/1/1
474	12 11 10	SWP, Chelsea Gray	412 or 413	440	5/3/12

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

0007-SWP-0072513

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
474	9	SWP, Chelsea Gray	413 or 412	440	8/
474	8	SWP, Chelsea Gray	511	265	6/
	7		412	440	1/
474	6	SWP, Chelsea Gray	511	215	1/
474	5	SWP, Chelsea Gray	511	163	4/
			18	70	
474	4 Alt C	SWP, Chelsea Gray	412	400	9/
			18	70	
474	4 Alt B	SWP, Chelsea Gray	412	400	8/
	4		18	70	7/
	4 Alt E				9/
474	4 Alt A	SWP, Chelsea Gray	18	175	8/
	4 Alt D				
474	3	SWP, Chelsea Gray	412	400	2/
	2 Alt A		18	70	2/
474	3 Alt C	SWP, Chelsea Gray	18	272	4/
474	3 Alt B	SWP, Chelsea Gray	18	164	3/
474	3 Alt A	SWP, Chelsea Gray	412	540	2/
			18	145	
474	2	SWP, Chelsea Gray	412	400	2/
			18	70	
474	2 Alt B	SWP, Chelsea Gray	412	540	2/
			18	145	
474	1	SWP, Chelsea Gray	412	400	8/
			18	70	

All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
474	1 Alt C	SWP, Chelsea Gray	18 BW 102	140 82	11/
474	1 Alt B 1 Alt A	SWP, Chelsea Gray	18	210	11/
476	8 7 6 5	SWP, One Coat, White	412	450	6/ 12/ 10/ 5/
476	4 3 2	SWP One Coat, White	412	460	10/ 6/ 3/
476	4 Alt A	SWP One Coat, White	412	460	3/
476	1	SWP One Coat, White	412	460	3/
477	19 18 17 Alt F-2	SWP, Westchester Gray	412 1424	165 165	2/ 12/ 12/
477	17 17 Alt Y-1 16	SWP, Westchester Gray	412 or 413 1424	165 165	3/ 10/ 3/
477	15 Alt A 15 14	SWP, Westchester Gray	412 or 413 1424	165 165	9/ 5/ 11/
477	13 12 11	SWP, Westchester Gray	412 or 413	330	5/ 3/ 12/
477	10 9	SWP, Westchester Gray	412 or 413	330	8/ 8/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
477	8	SWP, Westchester Gray	511	198	6/0
	7		412	330	1/2
477	6	SWP, Westchester Gray	412	300	1/0
			18	53	
477	5	SWP, Westchester Gray	511	163	4/7
			18	70	
477	4 Alt E	SWP, Westchester Gray	412	400	9/7
	4 Alt C		18	70	9/7
477	4 Alt A	SWP, Westchester Gray	18	175	8/0
	4 Alt D				9/7
477	3	SWP, Westchester Gray	412	400	2/7
			18	70	
477	3 Alt A	SWP, Westchester Gray	412	540	2/7
			18	145	
477	3 Alt C	SWP, Westchester Gray	18	272	4/0
477	3 Alt B	SWP, Westchester Gray	18	164	3/7
477	2	SWP, Westchester Gray	412	400	2/0
	4 Alt B		18	70	8/0
	4				7/7
477	2 Alt A	SWP, Westchester Gray	412	400	2/0
			18	70	
477	2 Alt B	SWP, Westchester Gray	412	540	2/0
			18	145	
477	1	SWP, Westchester Gray	412	400	8/0
			18	70	

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
477	1 Alt B 1 Alt A	SWP, Westchester Gray	18	210	11/1 11/1
478	23	SWP, Geneva Cream	68C6	345	8/2
478	22 21	SWP, Geneva Cream	412 1424	300 100	7/2 6/1
478	20 19 18 Alt A	SWP, Geneva Cream	412 or 413 1424	300 100	10/1 6/1 3/1
478	18 17 16	SWP, Geneva Cream	412 or 413 1424	300 100	10/1 6/1 4/0
478	15	SWP, Geneva Cream	412 or 413	440	2/2
478	14 13 12	SWP, Geneva Cream	412 or 413 1424 or 1412	350 50	1/2 1/1 12/1
478	11 10 9	SWP, Geneva Cream	412 or 413	440	5/1 3/2 12/1
478	8	SWP, Geneva Cream	413 or 412	440	8/1
478	7 6	SWP, Geneva Cream	511 412	265 440	6/1 1/2
478	5	SWP, Geneva Cream	511 18	163 70	4/2
478	4 Alt C 3	SWP, Geneva Cream	412 18	400 70	9/1 2/1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
478	4 Alt A 4 Alt D	SWP, Geneva Cream	18	175	8 9
478	4 Alt B 4 4 Alt E	SWP, Geneva Cream	412 18	400 70	8 7 9
478	3 Alt B	SWP, Geneva Cream	18	164	3
478	3 Alt A	SWP, Geneva Cream	18 412	145 540	2
478	3 Alt C	SWP, Geneva Cream	18	272	4
478	2	SWP, Geneva Cream	412 18	400 70	2
478	2 Alt B	SWP, Geneva Cream	412 18	540 145	2
478	2 Alt A	SWP, Geneva Cream	412 18	400 70	2
478	1	SWP, Geneva Cream	412	400	8
478	1 Alt B 1 Alt A	SWP, Geneva Cream	BW 102 (18)	210	11 11
478	1 Alt C	SWP, Geneva Cream	18 BW 102 (18)	140 70	11
479	26	SWP, Pearl Gray	412 BW 102 (18)	475 60	5
479	25	SWP, Pearl Gray	18	145.7	3
479	24	SWP, Pearl Gray	18	193	2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

PI: 1001175v1

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
479	23	SWP, Pearl Gray	1140	193	2/1
479	22	SWP, Pearl Gray	1140	80	11
479	22 Alt B	SWP, Pearl Gray	1140	518	10/
479	22 Alt A	SWP, Pearl Gray	BW 103	351	10/
479	13	SWP, Pearl Gray	412	406	5/2
479	12	SWP, Pearl Gray	412	480	3/1
482	14 13 12 Alt A 12	SWP, Hillcrest green	412	40	7/1 6/1 3/1 6/2
482	11 10	SWP, Hillcrest green	412	40	12/1 1/1
482	9	SWP, Hillcrest green	412	40	7/1
482	8	SWP, Hillcrest green	412 or 511	50 30	2/1
482	7	SWP, Hillcrest green	412 or 511	50 30	4/2
482	6 5 4	SWP, Hillcrest green	412	50	11/1 5/1 2/1
482	3	SWP, Hillcrest green	412	50	6-1
482	2	SWP, Hillcrest green	412	50	10-1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

0007-SWP-0072519

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
482	2 Alt A	SWP, Hillcrest green	412	120	1-
483	7 6	SWP, Sagamore Green	18	3	8- 9
485	20	SWP, #485 Warm Drab	1140	193	2-
485	19	SWP, #485 Warm Drab	1140	80	1
485	19 Alt B	SWP, #485 Warm Drab	BW102	538	10
485	19 Alt A	SWP, #485 Warm Drab	BW102	370	10
485	18	SWP, #485 Warm Drab	BW 102	607	9-
485	18 Alt A	SWP, #485 Warm Drab	BW 102	815	9-
485	17	SWP, #485 Warm Drab	BW 102	93	7-
485	16	SWP, #485 Warm Drab	BW 102	92	5
486	19 18	SWP, Golden Brown	412 1424	300 100	10 9
486	17 16	SWP, Golden Brown	412	480	10 6-
486	17 Alt A 15 14	SWP, Golden Brown	412	480	3- 12 10
486	13	SWP, Golden Brown	412	480	1
486	12	SWP, Golden Brown	412	480	3-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

0007-SWP-0072520

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
486	11	SWP, Golden Brown	412	480	6-
486	10	SWP, Golden Brown	412	480	7-
489	5 4 3 2 1	SWP, Tyrone Yellow	68C6	50	5-3 8-3 10- 8- 6- 2-
491	15	Family Paint, Light Gray	412	490	4-
491	14	Family Paint, Light Gray	412	490	2-
491	10 9	Family Paint, Light Gray	1140	58	7- 11-
491	8 7 6	Family Paint, Light Gray	411B	490	6- 10- 2-
491	8 Alt B	Family Paint, Light Gray	411B	390	9-
493	19	SWP, Woodland Brown	18	3	8-
493	13 11 7 6	SWP, Woodland Brown	412	30	6- 12- 3- 6-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
493	12	SWP, Woodland Brown	412	30	6-4
493	10 9 8	SWP, Woodland Brown	412	30 6	6-1 1-5 5-1
493	5	SWP, Woodland Brown	511 or 412	36 60	4-2
493	4 3	SWP, Woodland Brown	412	60	3-1 11-1
493	2 1	SWP, Woodland Brown	412	60	4-8 8-2
495	18	SWP, Manor Brown	18	4	8-1
495	16 13	SWP, Manor Brown	412	80	11-2 6-4
495	16 Alt A	SWP, Manor Brown	412	80	3-1
495	15 14 8	SWP, Manor Brown	412	80	8-1 6-1 3-3
495	12 11	SWP, Manor Brown	412	50	12-1 10-
495	10 9	SWP, Manor Brown	412	80	1-5 5-1

All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
495	7	SWP, Manor Brown	412	80	2-
495	6	SWP, Manor Brown	511 or 412	50 80	4-
495	5 4	SWP, Manor Brown	412	80	1- 11-
495	3 2	SWP, Manor Brown	412	80	6- 10-
495	1	SWP, Manor Brown	412	8	8-
496	60 - 57	SWP, Ivory	68C6	345	4- 12- 11- 11- 10-
496	56	SWP, Ivory	68C6	345	8-
496	55 54	SWP, Ivory	412 1424	300 100	7- 6-
496	53 52 51 Alt A 51	SWP, Ivory	412 or 413 1424	300 100	10- 6- 3- 10-
496	50 49	SWP, Ivory	412 or 413 1424	300 100	6- 4-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
496	48	SWP, Ivory	412 or 413	440	2-7
496	47 46 45	SWP, Ivory	412 or 413 1424 or 1412	315 50	1-7 1-4 12
496	44 43 42	SWP, Ivory	412 or 413	440	5-3 3-12
496	41 40	SWP, Ivory	413 or 412	440	9-8
496	39 38	SWP, Ivory	511 412	265 440	6-1
496	37	SWP, Ivory	511 18	163 70	4-1
496	36 Alt A 36 Alt D	SWP, Ivory	18	175	8-9
496	36 Alt B 36 36 Alt E 36 Alt C	SWP, Ivory	412 18	400 70	8-7 9-9
496	35 34 Alt A	SWP, Ivory	412 18	400 70	2-2
496	35 Alt A	SWP, Ivory	412 18	540 145	2-1
496	35 Alt B	SWP, Ivory	18	164	3-1
496	35 Alt C	SWP, Ivory	18	272	4-1

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
496	34	SWP, Ivory	412 18	400 70	2-
496	34 Alt B	SWP, Ivory	412 18	540 145	2-
496	33	SWP, Ivory	412 18	400 70	4-1
496	33 Alt C	SWP, Ivory	18 BW 102 (18)	140 70	11-
496	33 Alt B 33 Alt A	SWP, Ivory	18	210	11- 11-
496	32	SWP, Ivory	412 18	480 70	2-
496	32 Alt A	SWP, Ivory	412 18	450 70	2-
496	31 Alt A 31	SWP, Ivory	412 or 511	380 190	9-2 9-2
496	30 Alt A 30	SWP, Ivory	18	198	6-2 8-
496	29	SWP, Ivory	413 or 412 18	410 85	4-
496	28	SWP, Ivory	18	60	7-2
496	28 Alt C	SWP, Ivory	18	68	1-2

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
496	28 Alt A	SWP, Ivory	413 18	438 97	10
496	28 Alt B	SWP, Ivory	413 18	410 85	12
496	27	SWP, Ivory	18	60	5
496	26	SWP, Ivory	18	145.7	3
496	25	SWP, Ivory	18	193	2
496	24	SWP, Ivory	BW 102 (1140)	193	2
496	23	SWP, Ivory	412 1140	466 127	1
496	23 Alt B	SWP, Ivory	1128 1140	5 517	10
496	23 Alt A	SWP, Ivory	412 BW102	530 392	10
496	22	SWP, Ivory	412 BW102	430 574	9
496	22 Alt A	SWP, Ivory	BW102	759	9
496	21	SWP, Ivory	412 BW102	466 148	7
496	20	SWP, Ivory	412 BW102	466 147	5

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
496	19 18 17 16	SWP, Ivory	412	466	7- 4- 1- 11
496	15	SWP, Ivory	412	662	6
496	14	SWP, Ivory	412 BW102	480 400	3-
496	13	SWP, Ivory	412D	775	9-
496	4	SWP, Ivory	412	466	5
498	9	SWP, Moss Green	412	25	11
690	3	Screen Enamel Green Cust: SW Co.	18	34	12
690	2	Screen Enamel Green Cust: SW Co.	18	30	5-
757	26 25 24 23	Shingle Stain, Thatch Brown SW Co.	1424	8	2- 4- 10- 2-
757	22 21	Shingle Stain, Thatch Brown SW Co.	1424	8	1- 11
757	20 19	Shingle Stain, Thatch Brown SW Co.	1424	8	9- 6-
757	18	Shingle Stain, Thatch Brown SW Co.	1425	8	4-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

0007-SWP-0W72527

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
761	28 27 26 25	Shingle Stain, Dark Green SW Co.	1424	8	6- 2- 4- 10-
763	25 24 23 22	Shingle Stain, Green SW Co.	1424	8	2- 4- 10- 2-
763	21 20	Shingle Stain, Green SW Co.	1424	8	1- 11-
763	19 18	Shingle Stain, Green SW Co.	1424	8	9- 6-
763	17	Shingle Stain, Green SW Co.	1425 or 1424	8	4-
765	23 22	Shingle Stain, Indian Red SW Co.	1424	8	2- 4-
765	21 20 17 16	Shingle Stain, Indian Red SW Co.	1424	8	10- 2- 9- 6-
765	19 18	Shingle Stain, Indian Red SW Co.	1424	8	1- 11-
765	15	Shingle Stain, Indian Red SW Co.	1425	8	4-
765	9	Shingle Stain, Indian Red SW Co.	412	8	2-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
766	2	Shingle Stain, Thatch Brown SW Co.	1424	6	1-
766	1	Shingle Stain, Thatch Brown SW Co.	1425 or 1424	6	6
768	2	Shingle Stain, Indian Red SW Co.	1424	6	1
768	1	Shingle Stain, Indian Red SW Co.	1425 or 1424	6	6
771	30 29 28 27	Shingle Stain, gray SW Co.	412	228	3- 2- 6- 6-
771	26 25 24 21	Shingle Stain, gray SW Co.	412	228	4- 10- 5- 6-
771	23 22	Shingle Stain, gray SW Co.	412	228	1- 11-
771	20 19 18 17	Shingle Stain, gray SW Co.	412	228	6- 7- 6-
771	16 15	Shingle Stain, gray SW Co.	412	228	5- 2-
794	3 2	Shake paint, winter white SW Co.	412	200	7- 6-

* All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
794	1	Shake paint, winter white SW Co.	412	125	10-
795	3 2	Shake Paint, Desert Sand SW Co.	412	200	7- 6-
795	1	Shake Paint, Desert Sand SW Co.	412	125	10-
796	3 2	Shake Paint, Columbia Green SW Co.	412	200	7- 6-
796	1	Shake Paint, Columbia Green SW Co.	412	120	10-
797	3 2	Shake Paint, Surf Green SW Co.	412	250	7- 6-
797	1	Shake Paint, Surf Green SW Co.	412	125	10-
798	5 4 3 2	Shake Paint, Feather Gray SW Co.	412	200	1- 11- 7- 6-
798	1	Shake Paint, Feather Gray SW Co.	412	125	10-
799	4 3 2	Shake Paint, brown SW Co.	412	150	7- 7- 6-
799	1	Shake Paint, brown SW Co.	412	56	10-

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
910	8 7 6	Brick and stucco, white SW Co.	412	500	7. 6. 6.
910	5 3	Brick and stucco, white SW Co.	412	500	2. 3.
910	4	Brick and stucco, white SW Co.	412	500	11
910	2	Brick and stucco, white SW Co.	412	500	5
910	1	Brick and stucco, white SW Co.	412 or 511 414	760 380 380	9
911	1	Brick and stucco, ivory SW Co.	412	760	8
913	8 7 6	Brick and stucco, cream SW Co.	412	500	7. 6. 6.
913	5	Brick and stucco, cream SW Co.	412	500	9
913	4 3	Brick and stucco, cream SW Co.	412	760	2. 11
913	2 1	Brick and stucco, cream SW Co.	412	760	8 4
A1445*	3	Canvas Preservative Buff	412	39	5
1559*	1	White Lead Paste in Oil-Basic Carbonate	18	895	10

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
MO-1582*	1	Special Red Boottopping	412	141	1/
1621*	1	White Lead Whiting Putty	9	86	7/
1684*	1	Exterior Paint, white	412(E) 18	527 545	7/
A1772*	1	Gray Primer	315	578	8/
1774*	1	Auto Filler, gray	9	492	11
A2296*	4	Cinder Gray Exterior Paint For Central Supply Company	18	273	7/
A2296*	1	Cinder Gray Exterior Paint For Central Supply Company	18	342	5/
2604*	1	White Lead Whiting Putty	18	73	7/
A3263*	4-1	Dura-Mix Floor and Deck Enamel, chestnut	9	35	3/
A3618*	2	Marlyn Seal Color For Capitol Wallpaper Co.	412(E) 18	685 335	5/
A3618*	1	Marlyn Seal Color For Capitol Wallpaper Co.	412(E) 18	395 193	4/
A3619*	2	Marlyn Trim Color For Capitol Wallpaper Co.	412(E) 18	581 284	5/
A3619*	1	Marlyn Trim Color For Capitol Wallpaper Co.	412(E) 18	363 177	4/
A3691*	2	Exterior Paint, white For US Government	18	740	4/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
A3691*	1	Exterior Paint, white For US government	412(E) 18	342 805	4/
A3797*	1	Exterior paint-white For U.S. Government	18	460	12
A4582*	2-1	Lucolastic No. 2, red boottopping	412	141	7 2/
A6009*	2 All A-1	Blue Lead Primer For Leonard Miller	6815	400	1/1 9/
A6117*	3-1	Tinted Gloss, caribbean green For Export	412	300	1/1 11
A6117*	4	Tinted Gloss, caribbean green For Export	68C6	300	1/
A6198*	2-1	House Paint, white For Speedwell Paint & Wallpaper	68C6	200	7/1 10
A6198*	6 4-3	House Paint, white For Speedwell Paint & Wallpaper	6829	200	5/1 1/30/59 th
A6205*	11-7	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	68A4	175	5/1 2
A6205*	6	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	68A4	175	8/
A6205*	5-4	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	6805	175	3/1 8/
A6205*	3-2	Gloss House Paint Prime White For Speedwell Paint & Wallpaper	6801	230	1/1 1
A6246*	2	House Paint, white For Speedwell Paint & Wallpaper	6829	200	5/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

0007-SWP-0072532

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date
A6283*	4-3	Levittown Q.D. Dipping Primer For Builders Supply	6805	150	10/8/
A6334*	3-2	Q.D. Dipping Primer for Levittown For Builders Supply	68A4	150	5/21/
A6334*	1	Q.D. Dipping Primer for Levittown For Builders Supply	68A4	150	5/21/
A6346*	4-3	One Coat White for Levittown For Builders Supply	6829	125	5/26/
A6346*	2-1	One Coat White for Levittown For North Shore Supply Co.	6829	125	8/31/
A6347*	5	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6822	175	3/
A6347*	4-2	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6829	200	9/6/
A6347*	1	Gloss House Paint, Mildew Resistant for 1 or 2 coat work For Speedwell Paint & Wallpaper	6829	200	3/
A6349*	6-5	1 Coat House Paint for Levittown For Builders Supply Corp.	6829	225	5/31/
A6349*	4-2	1 Coat House Paint for Levittown For Builders Supply Corp.	6829	125	6/5/
A6351*	3	Trim Color, Slate Gray for Levittown	6829	125	4/

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Rex No.	Card No.	Brand Name, Color and Type	Lead Pigment Raw Material No.	Amount of Lead Pigment (Pounds)	Date of
A6377*	7 Alt A-1	"500" House Paint Primer Mildew Resistant, white For John Lucas Trade Sales	68A4	125	11/1
A6569*	3-2	House Paint Exterior Primer, white For S. Yospin and Sons	68A4	175	8/4 9/2
A6570*	2	House Paint Exterior Gloss, white For S. Yospin and Sons	6829	200	8/12
13288*	1	Iron Paint Steel Color	9 412(E)	43 50	2/24
16129*	1	English Patent Drier, Paste	9	260	10/1
17460*	1	25% White Lead Putty For Trade in General	18	110	4/21
63708	2	Mildew Resistant SWP, driftwood gray For Export	412 1424	300 100	9-23
63709	2	Mildew Resistant SWP, canyon rose For Export	412 1424	300 100	9-23
63710	2	Mildew Resistant SWP, rock gray For Export	412 1424	300 100	9-23
63711	2	Mildew Resistant SWP, dakota gray For Export	412 1424	300 100	9-23

*All Rex numbers shown with an asterisk are John Lucas Co. Formulas.

Pt: 1001175v1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE CITY OF NEW YORK, THE NEW
YORK CITY HOUSING AUTHORITY, and
THE NEW YORK CITY HEALTH AND
HOSPITALS CORPORATION,

Index No. 1436S/89

Plaintiffs,

IAS Part 39
(Freedman, J.)
Referee Roberts

-against -

LEAD INDUSTRIES ASSOCIATION, INC.,
NL INDUSTRIES, INC., EAGLE-PICHER
INDUSTRIES, INC., ATLANTIC
RICHFIELD COMPANY, THE SHERWIN-
WILLIAMS COMPANY, SCM
CORPORATION, THE GLIDDEN
COMPANY, AMERICAN CYANAMID
AND FULLER-O-BRIEN CORPORATION,

Defendants.

**RESPONSES OF THE SHERWIN-WILLIAMS COMPANY TO
NEW YORK CITY HOUSING AUTHORITY'S MARCH 1999
NOTICES TO ADMIT AND INTERROGATORIES TO ALL DEFENDANTS**

Defendant The Sherwin-Williams Company hereby responds, pursuant to Rules 3123 and 3130-3133 of the New York Civil Practice Law and Rules and the March 12, 1999 directive of Referee Roberts, to the New York City Housing Authority's ("NYCHA") March 1999 Notices to Admit and Interrogatories to All Defendants.

GENERAL OBJECTIONS

1. These General Objections are incorporated into each of Sherwin-Williams' responses to the following Notices to Admit and Interrogatories (collectively, "NYCHA's disclosure requests") as though fully set forth. Notwithstanding the following objections, Sherwin-Williams will respond based on information known and appreciated by it as of the date

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of its responses, subject to the ability to amend, supplement or withdraw those responses as necessary.

2. Sherwin-Williams objects to the extent the disclosure requests seek a final and complete response because disclosure is ongoing and additional facts remain to be learned. Sherwin-Williams further objects to the extent the disclosure requests seek a response based on all documents produced to date because of the size and recency of production. Sherwin-Williams objects to the disclosure requests to the extent they seek to require a comprehensive examination of such documents.

3. Sherwin-Williams objects on the basis that some of the information requested by the disclosure requests likely was available in documents maintained by NYCHA or others, or was available via witnesses, but this information has been lost, destroyed or otherwise rendered unavailable by NYCHA's delay in filing this action and its failure to keep, protect or preserve this information.

4. Sherwin-Williams objects on the basis that some of the information requested by the disclosure requests might be contained in documents or known by witnesses that either NYCHA or the City of New York has failed or refused to disclose. In particular but without limitation, Sherwin-Williams objects because NYCHA has failed or refused to admit or otherwise appropriately respond to Notices to Admit and Interrogatories served on NYCHA.

5. Sherwin-Williams objects on the basis that NYCHA as plaintiff has the burden of proof on its claims and that the disclosure requests seek to impermissibly shift that burden onto Sherwin-Williams.

6. Sherwin-Williams objects to the disclosure requests because they seek information that is protected or privileged by the attorney-client privilege, the attorney work product privilege and the trial preparation privilege.

7. Sherwin-Williams objects to the disclosure requests because they are unlimited in time; Sherwin-Williams will respond for the time period from the date Sherwin-Williams was incorporated until 1960.

8. Sherwin-Williams objects to Notices to Admit 105, 106 and 110 through 142 because NYCHA has not been given leave to serve those notices. In addition, Sherwin-Williams objects to answering Interrogatories 1 through 3 except insofar as responsive information is identified in Sherwin-Williams' responses to the Notices to Admit.

OBJECTIONS TO DEFINITIONS

Objections to Definitions a, d, f, g, i, j, l and o. Sherwin-Williams objects to these definitions as overly broad, vague and ambiguous because it is not aware of the identity of "all divisions, facilities, associated and affiliated companies, subsidiaries, parents, holding companies, predecessors, successors, agents, employees, and persons presently or formerly acting on its behalf" with respect to the persons or entities purportedly encompassed by these Definitions and the neither the Definitions nor the Notices to Admit identify them.

Objections to Definitions b and m. Sherwin-Williams objects to NYCHA's definitions of "Defendant," "you" and "Sherwin-Williams" as overly broad, vague and ambiguous and will respond with respect to Sherwin-Williams' divisions, facilities and affiliated companies, to the extent known and as to which information is known regarding them.

Objections to Definitions h and n. Sherwin-Williams objects to NYCHA's definitions of "white lead pigment" as overly broad and ambiguous and will respond as to white lead carbonate pigment and white lead sulfate pigment, dry or in oil. Sherwin-Williams further objects to NYCHA's use of the term "lead-based paint" and "white lead paints" and will respond based on paints that contained more than one percent by total weight of white lead pigment.

RESPONSES TO REQUESTS FOR ADMISSION

1. You know of no evidence showing the total or partial amount of white lead carbonate made by SCM and/or Glidden and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects to the term "partial amount" because it is too vague to allow Sherwin-Williams to meaningfully respond. Without prejudice to this objection, Sherwin-Williams admits that it knows of no evidence showing the total amount of white lead carbonate made by SCM and/or Glidden and used in interior residential paints for any year from 1937 through 1954.

2. You know of no evidence showing the total or partial amount of white lead carbonate made by Sherwin-Williams and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects to the term "partial amount" because it is too vague to allow Sherwin-Williams to meaningfully respond. Without prejudice to this objection, Sherwin-Williams admits that it knows of no evidence showing the total amount of white lead carbonate made by Sherwin-Williams and used in interior residential paints for any year from 1937 through 1954. By way of further response, it is believed that virtually all of Sherwin-Williams' interior paints did not contain white lead pigments by no later than 1937. See, e.g., Affidavit of John Heitmann dated April 1, 1999 ("Heitmann Aff."), ¶¶ 16-19 and accompanying exhibits.

3. You know of no evidence showing the total or partial amount of white lead carbonate made by National Lead and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to National Lead.

4. You know of no evidence showing the total or partial amount of white lead carbonate made by John R. MacGregor Lead Co. and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to John R. MacGregor Lead Co.

5. You know of no evidence showing the total or partial amount of white lead carbonate made by IS&R and/or Anaconda and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to IS&R and/or Anaconda.

6. You know of no evidence showing the total or partial amount of white lead carbonate made by W.P. Fuller and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to W.P. Fuller.

7. You know of no evidence showing the total or partial amount of white lead carbonate made by Eagle-Picher and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to Eagle-Picher.

8. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by SCM and/or Glidden from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to shipments to or sales in New York City.

9. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by Sherwin-Williams from 1937 through 1947 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 2 and restates it with respect to shipments to or sales in New York City. By way of further answer, it is believed that Sherwin-Williams made comparatively few shipments to or sales in New York City. See, e.g., Heitmann Aff., ¶¶ 91-96 and accompanying exhibits; Affidavit of Jerry A. Hausman dated April 1, 1999, ¶¶ 24-30 ("Hausman Aff.") and accompanying exhibits.

10. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by National Lead from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 3 and restates it with respect to shipments to or sales in New York City.

11. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by John R. MacGregor Lead Co. from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 4 and restates it with respect to shipments to or sales in New York City.

12. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by IS&R and/or Anaconda from 1937 through 1946 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 5 and restates it with respect to shipments to or sales in New York City.

13. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by W.P. Fuller from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 6 and restates it with respect to shipments to or sales in New York City.

14. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by Eagle Picher from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 7 and restates it with respect to shipments to or sales in New York City.

15. You have no evidence that SCM and/or Glidden advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

16. You have no evidence that Sherwin-Williams advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

17. You have no evidence that National Lead advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

18. You have no evidence that John R. MacGregor Lead Co. advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

19. You have no evidence that IS&R and/or Anaconda advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

20. You have no evidence that W.P. Fuller advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

21. You have no evidence that the Lead Industries Association advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

22. You have no evidence that Eagle-Picher advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

23. You have no evidence that SCM and/or Glidden intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

24. You have no evidence that Sherwin-Williams intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

25. You have no evidence that National Lead intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

26. You have no evidence that John R. MacGregor Lead Co. intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

27. You have no evidence that IS&R and/or Anaconda intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

28. You have no evidence that W.P. Fuller intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

29. You have no evidence that the LIA intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

30. You have no evidence that Eagle-Picher intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

31. You have no evidence that SCM and/or Glidden misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

32. You have no evidence that Sherwin-Williams misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

33. You have no evidence that National Lead misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

34. You have no evidence that John R. MacGregor Lead Co. misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

35. You have no evidence that IS&R and/or Anaconda misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

36. You have no evidence that W.P. Fuller misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

37. You have no evidence that the LIA misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

38. You have no evidence that Eagle-Picher misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

39. You have no evidence that SCM and/or Glidden concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

40. You have no evidence that Sherwin-Williams concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

41. You have no evidence that National Lead concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

42. You have no evidence that John R. MacGregor Lead Co. concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

43. You have no evidence that IS&R and/or Anaconda concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

44. You have no evidence that W.P. Fuller concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

45. You have no evidence that the LIA concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

46. You have no evidence that Eagle-Picher concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

47. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by SCM and/or Glidden.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

48. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Sherwin-Williams.

ANSWER:

Admitted.

49. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

50. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by John R. MacGregor Lead Co.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

51. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by IS&R and/or Anaconda.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

52. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by W.P. Fuller.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

53. You know of information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Eagle-Picher.

ANSWER:

Sherwin-Williams objects to this notice because it is ambiguous and unclear in that, contrary to the surrounding notices (which use the phrase "You know of no information"), this notice uses the phrase "You know of information." Sherwin-Williams responds as though this notice was intended to read as follows: "You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Eagle-Picher." Sherwin-Williams denies this Notice as restated. *See, e.g.*, Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

54. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by SCM and/or Glidden.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

55. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by Sherwin-Williams.

ANSWER:

Admitted.

56. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

57. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by John R. MacGregor Lead Co.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

58. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by W.P. Fuller.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

59. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by Eagle-Picher.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

60. The only use, of which you have any information about, of any Sherwin-Williams' paint at Williamsburg Houses before 1955 was a gray buck primer used at Williamsburg Houses that contained lithopone and magnesium silicate as its pigments.

(0008-LGA-000001325)

ANSWER:

Admitted.

61. You know of no information indicating that SCM and/or Glidden bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

62. You know of no information indicating that Sherwin-Williams bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Admitted.

63. You know of no information indicating that National Lead bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

64. You know of no information indicating that John R. MacGregor Lead Co. bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

65. You know of no information indicating that IS&R and/or Anaconda bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating,

inter alia, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

66. You know of no information indicating that W.P. Fuller bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

67. You know of no information indicating that Eagle-Picher bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

68. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of SCM and/or Glidden.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, inter alia, to loss, destruction or non-production of information).

69. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of Sherwin-Williams.

ANSWER:

Admitted.

70. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

71. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of John R. MacGregor Lead Co.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information).

72. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of W.P. Fuller.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information).

73. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of Eagle-Picher.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

74. You know of no information indicating that NYCHA at any time from 1937-1954 purchased for or used on the interiors of Williamsburg Houses, lead-based paint made or sold

by: (a) Amsterdam Color Works
(b) M.J. Merkin

- (c) Thompson -Porcelite Paint Co.
- (d) Hoboken White Lead and Color Works
- (e) U.S. Gutta Percha
- (f) Muralo Co.
- (g) Nu-Enamel Corp.
- (h) Adelphi Paint and Color Works

ANSWER:

Sherwin-Williams objects that this Notice is vague and ambiguous in its use of the term "interiors." Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams states that it is aware that NYCHA specified or purchased (or planned to specify or purchase) paint for Williamsburg Houses from each of the identified entities, but is unable at present to admit or deny the specifics regarding such paint, including its composition or its ultimate use.

75. You have no evidence showing or suggesting that Dr. Joseph Aub at any time provided advice to any defendant that was in bad faith or not consistent with his professional judgment.

ANSWER:

Admitted.

76. You have no evidence showing or suggesting that Dr. Robert Kehoe at any time provided any defendant advice that was not in good faith or was not consistent with his professional judgment.

ANSWER:

Admitted.

77. Each of the following lead pigments was not used in residential interior paints purchased or used by NYCHA at Williamsburg Houses from 1937 to 1954:

- (a) lead silicate
- (b) leaded zinc oxide

- (c) leaded zinc
- (d) litharge
- (e) red lead
- (f) lead sulfate
- (g) chrome yellow
- (h) chrome orange
- (i) chrome green
- (j) lead phosphate

ANSWER:

Denied.

78. With respect to each apartment at Williamsburg Houses for which NYCHA seeks to recover damages:

- (a) defendant cannot identify the year of manufacture or sale of any interior lead-based paint allegedly present
- (b) defendant cannot identify the year of manufacture or sale of any white lead pigment in interior paint allegedly present
- (c) defendant cannot identify the year during which any interior lead-based paint present there was applied
- (d) not all layers of interior paint contained lead pigment
- (e) there was no white lead pigment in the outermost layer of paint on any interior surface

ANSWER:

Sherwin-Williams objects because this Notice does not identify the specific apartments "for which NYCHA seeks to recover damages" and therefore Sherwin-Williams is unable to

admit or deny this Notice. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, inter alia, to loss, destruction or non-production of information).

79. During the 1990s, you know of only three Department of Health reports of children who had elevated blood levels while living at Williamsburg Houses.

ANSWER:

Sherwin-Williams admits only that it knows of, at most, three reports of children with elevated blood levels while living at Williamsburg Houses, but denies that such reports linked the elevated blood levels to exposure to lead-based paint or white lead pigment, and Sherwin-Williams is further aware of reports that no children living at Williamsburg Houses had elevated blood levels.

80. You have no evidence that any type of lead pigment other than white lead pigment was applied to the interior walls of apartments at Williamsburg Houses.

ANSWER:

Denied.

81. You have no evidence that any type of lead pigment other than white lead pigment was applied to the door frames of apartments at Williamsburg Houses.

ANSWER:

Denied.

82. You have no evidence that any type of lead pigment other than white lead pigment was applied to the baseboards of apartments at Williamsburg Houses.

ANSWER:

Denied.

83. You have no evidence that any type of lead pigment other than white lead pigment was applied to the bathroom doors of apartments at Williamsburg Houses.

ANSWER:

Denied.

84. You have no evidence that any type of lead pigment other than white lead

pigment was applied to the heat risers of apartments at Williamsburg Houses.

ANSWER:

Denied.

85. You have no evidence that any type of lead pigment other than white lead pigment was applied to the window headers of apartments at Williamsburg Houses.

ANSWER:

Denied.

86. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to the interior walls of Williamsburg Houses.

ANSWER:

Denied. Based on the available information regarding NYCHA purchasing and specification practices, it is believed that a specific manufacturer was identified and approved at the time of purchase.

87. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any interior walls of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

88. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to any door frames inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

89. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any door frames inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

90. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to any baseboards inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

91. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any baseboards inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

92. Sherwin-Williams, ODP White Lead Use Instruction (SW 5052; included in Exh. 154 of Plaintiff's Affidavits in support of the December 31, 1998 motion) contains a 1941 date code.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the interpretation requested by this Notice, but specifically reserves the right to amend or supplement this response.

93. At some time during the period 1940-47, Sherwin-Williams recommended or promoted the use of its ODP white lead for interior surfaces.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "recommended or promoted" or "interior surfaces" adequately and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible

document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response.

94. During the 1951-54 time period, the labels of some Sherwin-Williams' Lowe Brothers' paints containing white lead carbonate (32 SWP 16309-10, 32 SWP 16315-16 included in Exh. 157 of Plaintiff's Affidavits) indicated that the paint could be used "For Exterior or Interior Use".

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, including whether the indicated labels were ever actually used on paints sold to the public, but specifically reserves the right to amend or supplement this response. By way of further response, Sherwin-Williams denies that the referenced documents contain the quoted phrase and further states that the documents contain statements that the products are "especially designed for priming exterior surfaces."

95. Sherwin-Williams published an article entitled "Dangers of White Lead" in the July 1904 issue of The SWP. (Exh. 9 of Plaintiffs' Affidavits).

ANSWER:

Sherwin-Williams objects that this Notice is not relevant to NYCHA's claims, but otherwise admits this Notice.

96. In a report entitled "An Industrial Hygiene Survey of the Kensington Plant of the Sherwin-Williams Company," Sept. 1, 1937 to Nov. 15, 1937, Dr. Carey P. McCord wrote to Sherwin-Williams that "a useful purpose has been served through the substitution of [lithopone] or other non-lead paint in the painting of the interiors of nurseries, kindergartens, etc., where some danger existed that immature persons might chew up flaked off lead, etc." (7-SWP-30455 included in Exh. 151 of Plaintiff's Affidavits).

ANSWER:

Sherwin-Williams objects that this Notice is not relevant to NYCHA's claims, but otherwise admits only that the referenced document contains the following statement: "a useful purpose has been served through the substitution of this paint or other non-lead paint in the painting of the interiors of nurseries, kindergartens, etc., where some danger existed that

immature persons might chew up flaked off lead, etc." Sherwin-Williams is unable to otherwise admit or deny this Notice.

97. Sherwin-Williams made paints containing white lead carbonate for use on interior surfaces after receiving this report from Dr. McCord.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "paints containing white lead carbonate" or "interior surfaces" and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice as stated because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response. Notwithstanding this objection and response, Sherwin-Williams admits only that it is aware of certain formula cards produced to NYCHA regarding paints with white lead carbonate pigment in the formula and that indicate certain interior or exterior uses, but Sherwin-Williams is not aware whether or the extent to which such paints were made or sold, or the use for which such paints were made or sold. As indicated in response to Notice No. 2, which is incorporated by reference, Sherwin-Williams believes that virtually all of its interior paints did not contain lead pigment by 1937 at the latest. Sherwin-Williams specifically reserves the right to amend or supplement this response.

98. Sherwin-Williams continued to recommend using ODP white lead on interior surfaces after receiving this report from Dr. McCord.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "recommend" or "interior surfaces" adequately and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response.

99. Dr. John A. Heitmann's statement in his affidavit in Brenner v. American Cyanamid that Sherwin-Williams had "ceased making interior lead paints even before the risk to children became known to it" is not accurate.

ANSWER:

Denied.

100. In 1944 or 1945, IS&R and/or Anaconda distributed or circulated "The Story of Anaconda Electrolytic White Lead." (PNYC00000001-PNYCO00000022).

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

101. You have no evidence that Glidden participated in the Forrest Products - Better Paint Campaign.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4, this Notice is admitted at present.

102. As early, as 1924, Glidden manufactured, advertised, and sold a lead free paint known as "Zinc-O'Lith" which it advertised as non-poisonous.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

103. John R. MacGregor Lead Co. did not produce or sell white lead pigments in any year prior to 1938.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

104. You know of no evidence showing the percentage or any amount of white lead pigment made or sold by John R. MacGregor Lead Co. in any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects because this Notice is vague and ambiguous in that it does not define the term "percentage." Without prejudice to this objection, this Notice is denied.

105. John R. MacGregor Lead Co. produced red lead pigment.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

106. A company owned by American Cyanamid produced the following products:

- (a) chrome yellow
- (b) chrome green
- (c) chrome orange and/or
- (d) chrome red

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8. Sherwin-Williams also objects because this Notice does not identify the "company" to which it refers.

107. Glidden, Sherwin-Williams, National Lead, John R. MacGregor Lead Co., IS&R and/or Anaconda, W.P. Fuller, and Eagle Pitcher account for one hundred percent of the white lead pigment produced in the United States for the period from 1937 through 1954.

ANSWER:

Denied.

108. You know of no evidence that white lead pigment manufactured by W.P. Fuller was used in any product applied to interior residential surfaces in the State of New York for any year from 1937-1954.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

109. You have no evidence showing that white lead pigment manufactured by W.P. Fuller was used in paint manufactured by someone other than W.P. Fuller.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

110. At some point during the 1940s, the John R. MacGregor Lead Co. participated in the LIA's White Lead Promotional Campaign.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

111. At some point during the 1950s, Glidden promoted the use of white lead pigment for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

112. At some point during the 1950s, National Lead promoted the use of white lead pigment for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

113. At some point during the 1950s, the LIA promoted the use of white lead pigment and/or paint containing white lead for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

114. LIA has never produced, manufactured, or caused to be produced:

- (a) white lead pigments
- (b) white lead paints
- (c) white lead-in-oil
- (d) lead-based paints
- (e) any lead pigment

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

115. You have no information of the text of the proposed legislation or proposed

regulation which was the subject matter of any of the defendant's lobbying activity:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

3/115A. You do not have any information of the actual (verbatim) words spoken by any defendant's employee, board member or agent to any government official or legislator in connection with LIA's alleged lobbying activities:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955
- (e) in New York City in 1954

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

116. You do not have a transcript of any oral statement or a copy of any written statement made to or given to any government official or legislator by any defendant's employee, agent, or board member in connection with LIA's alleged lobbying activities:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

117. Other than the documents produced by defendants or included in NYCHA's exhibits, you have no other information about communications between the LIA and legislators and/or officials of the following governmental entities concerning any enacted or proposed lead-based paint or lead pigment law or regulation:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Massachusetts
- (h) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

118. In regard to the following entities, you have no information suggesting that any defendant's lobbying of legislators or government officials concerning any enacted or proposed lead pigment or lead-based paint law or regulation was conducted in an illegal or in an unethical manner:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California

- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

119. In regard to the following entities, you have no information suggesting that any defendant's lobbying of government officials concerning any enacted or proposed lead pigment or lead-based paint law or regulation was conducted in other than-a legally permissible manner:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

120. In regard to the following entities, you have no information suggesting that any of

the defendants misrepresented any fact to any governmental official or legislator during its lobbying activities in connection with any enacted or proposed lead pigment or lead-based paint regulation or law:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

121. The LIA failed to inform the public about all that it knew about the health risks posed to children from exposure to lead-based paint during the following time periods:

- (a) 1928 through 1937
- (b) 1938 through 1948
- (c) 1949 through 1954
- (d) 1955 through 1960

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

122. Unlike the 1937 LIA Conference on Lead Poisoning, the 1946 LIA Conference on

Lead Poisoning was cosponsored by the LIA and the American Medical Association.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

123. During the period 1928 to 1954, the LIA never promulgated industry-wide specifications for the manufacture or production of the following items:

- (a) white lead pigments
- (b) white lead paints
- (c) white lead-in-oil
- (d) lead-based paints
- (e) any lead pigments

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

124. At some point during the 1928 to 1954 period, at least one of the following defendants or entities delegated responsibility for researching the health hazards of lead to the LIA:

- (a) National Lead Company
- (b) The Sherwin-Williams Company
- (c) The Glidden Company
- (d) IS&R and/or Anaconda
- (e) W.P. Fuller & Co.
- (f) John R. MacGregor Lead Company
- (g) Eagle-Picher Industries, Inc.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

125. At some point during the 1928 to 1954 period, at least one of the following defendants or entities delegated responsibility for developing warnings for lead-based paint products to the LIA:

- (a) National Lead Company
- (b) The Sherwin-Williams Company
- (c) The Glidden Company
- (d) IS&R and/or Anaconda
- (e) W.P. Fuller & Co.
- (f) John R. MacGregor Lead Company
- (g) Eagle-Picher Industries, Inc.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

126. Defendant has no information indicating that no tenant in any of NYCHA's housing units ever read any article on white lead pigment or white lead-based paint in or reprinted from "Lead Magazine."

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

127. Defendant has no information indicating that no employee or official of NYCHA ever read any article on white lead pigment or white lead-based paint in or reprinted from "Lead Magazine."

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

128. Defendant has no evidence indicating that no employee or official of NYCHA ever read any article, book or pamphlet written or published by the LIA which is referred to in the Markowitz and Rosner Affidavit.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

129. Defendant has no evidence indicating that no employee or official of NYCHA ever read any advertisement dealing with white lead pigment or white lead-based paints published by the LIA in any newspaper, periodical or magazine.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

130. Defendant has no evidence indicating that no employee or official of NYCHA ever read any of the advertisements referred to in the Markowitz and Rosner Affidavit which were placed in magazines, newspapers and periodicals by the LIA.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

131. Dr. Robert Kehoe of the Kettering Institute in Cincinnati, Ohio was a leading researcher in the United States in lead poisoning from the 1930's through the 1950's.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

132. Defendant has no evidence that any part of Dr. Robert Kehoe's research which was partially or wholly funded by contributions from the LIA was conducted in any way other than in accordance with accepted scientific research standards.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

133. The LIA or an LIA official threatened to sue Dr. Randolph Byers during the 1940s.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

134. At times from the late 1940's to the 1960's the LIA provided funds to Dr. Randolph Byers for his research into the health effects of lead on the human body and on children.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

135. There is at least circumstantial evidence suggesting that Dr. Randolph Byers' research on the health effects of lead was influenced by LIA's funding.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

136. You have no information suggesting that during the 1934-40 period the LIA ever informed any NYCHA employee or official about any potential risks posed to children from exposure to lead-based paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

137. From 1930 and from then on after, the LIA recommended that owners of cribs, toys and children's furniture not repaint such items with lead-based paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

138. In or about 1933, the LIA's Felix Wormser informed Drs. McKhann and Vogt that crib and toy manufacturers had been informed about the dangers of childhood lead poisoning. (Exh. 34 to NYCHA's Affirmation).

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

139. In 1934 and thereafter, the LIA recommended that manufacturers of children's toys and furniture not use lead-based paint on children's toys and furniture.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

140. You have no evidence that demonstrates that the LIA, during the 1930s or 1940s ever told Glidden and/or Sherwin-Williams to stop promoting lead-based paints for use on children's toys or furniture.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

141. There were no laws or regulations prohibiting the sale of white lead pigment or lead-based paint in the City of New York and State of New York until 1959.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

142. Between 1937 and 1954 companies which manufactured lead-based paint for interior residential use did not always list lead as an ingredient on the labels of their cans of interior paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

RESPONSE TO INTERROGATORY NO. 1

(a) Set forth all facts which you contend support your responses; (b) identify every person who has knowledge or information which you contend supports your responses and (c) produce every document which you contend supports your responses.

ANSWER:

Sherwin-Williams incorporates its General Objection Nos. 1 through 8. Where appropriate, Sherwin-Williams has provided additional information in its responses to the Notices to Admit.

RESPONSE TO INTERROGATORY NO. 2

Set forth all facts supporting the LIA's claim in it Notices to Admit No. 16 that the question of "warnings on lead-base paints was a subject of public debate and of proposed legislation or regulation" during the 1920s.

ANSWER:

Sherwin-Williams objects because this Interrogatory does not appear to be directed to Sherwin-Williams and therefore does not appear to seek a response from it. Sherwin-Williams incorporates its General Objection Nos. 1 through 8.

RESPONSE TO INTERROGATORY NO. 3

State forth all facts supporting the LIA's claim in it Notices to Admit No. 57 that in 1930 "the LIA recommended that owners of cribs, toys and children's furniture not repaint such items with lead-based paint."

ANSWER:

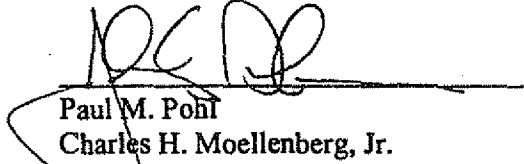
Sherwin-Williams objects because this Interrogatory does not appear to be directed to Sherwin-Williams and therefore does not appear to seek a response from it. Sherwin-Williams incorporates its General Objection Nos. 1 through 8.

Dated: April 12, 1999

THE SHERWIN-WILLIAMS COMPANY,

By its attorneys,

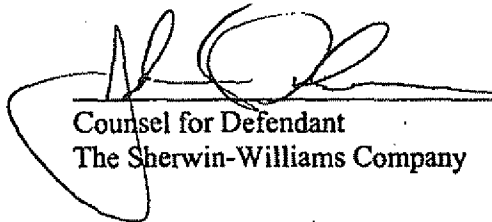
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Responses of the Sherwin-Williams Company to New York City Housing Authority's March 1999 Notices to Admit and Interrogatories to All Defendants was served by express, overnight courier on John R. Low-Beer, counsel for the New York City Housing Authority, and was mailed by U.S. mail, postage prepaid, to the remaining counsel on the attached service list on April 12, 1999.



Counsel for Defendant
The Sherwin-Williams Company

Attachment

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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April 12, 1999

VIA FEDERAL EXPRESS

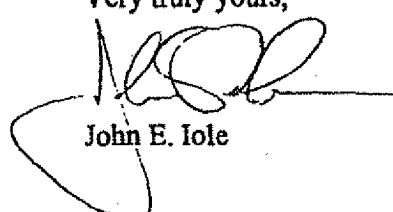
John R. Low-Beer, Esq.
Assistant Corporation Counsel
Corporation Counsel of the City of New York
100 Church Street, Room 326N
New York, NY 10007

Re: City of New York v. The Sherwin-Williams Company, et al.

Dear Mr. Low-Beer:

I am enclosing the Responses of the Sherwin-Williams Company to New York City Housing Authority's March 1999 Notices to Admit and Interrogatories to all Defendants.

Very truly yours,


John E. Iole

Enclosure

cc: All Counsel (w/encl) (via first class mail)

0007-SWP-0072576

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE CITY OF NEW YORK, THE NEW
YORK CITY HOUSING AUTHORITY, and
THE NEW YORK CITY HEALTH AND
HOSPITALS CORPORATION,

Index No. 1436S/89

Plaintiffs,

IAS Part 39
(Freedman, J.)
Referee Roberts

-against -

LEAD INDUSTRIES ASSOCIATION, INC.,
NL INDUSTRIES, INC., EAGLE-PICHER
INDUSTRIES, INC., ATLANTIC
RICHFIELD COMPANY, THE SHERWIN-
WILLIAMS COMPANY, SCM
CORPORATION, THE GLIDDEN
COMPANY, AMERICAN CYANAMID
AND FULLER-O-BRIEN CORPORATION,

Defendants.

**RESPONSES OF THE SHERWIN-WILLIAMS COMPANY TO
NEW YORK CITY HOUSING AUTHORITY'S MARCH 1999
NOTICES TO ADMIT AND INTERROGATORIES TO ALL DEFENDANTS**

Defendant The Sherwin-Williams Company hereby responds, pursuant to Rules 3123 and 3130-3133 of the New York Civil Practice Law and Rules and the March 12, 1999 directive of Referee Roberts, to the New York City Housing Authority's ("NYCHA") March 1999 Notices to Admit and Interrogatories to All Defendants.

GENERAL OBJECTIONS

1. These General Objections are incorporated into each of Sherwin-Williams' responses to the following Notices to Admit and Interrogatories (collectively, "NYCHA's disclosure requests") as though fully set forth. Notwithstanding the following objections, Sherwin-Williams will respond based on information known and appreciated by it as of the date

of its responses, subject to the ability to amend, supplement or withdraw those responses as necessary.

2. Sherwin-Williams objects to the extent the disclosure requests seek a final and complete response because disclosure is ongoing and additional facts remain to be learned. Sherwin-Williams further objects to the extent the disclosure requests seek a response based on all documents produced to date because of the size and recency of production. Sherwin-Williams objects to the disclosure requests to the extent they seek to require a comprehensive examination of such documents.

3. Sherwin-Williams objects on the basis that some of the information requested by the disclosure requests likely was available in documents maintained by NYCHA or others, or was available via witnesses, but this information has been lost, destroyed or otherwise rendered unavailable by NYCHA's delay in filing this action and its failure to keep, protect or preserve this information.

4. Sherwin-Williams objects on the basis that some of the information requested by the disclosure requests might be contained in documents or known by witnesses that either NYCHA or the City of New York has failed or refused to disclose. In particular but without limitation, Sherwin-Williams objects because NYCHA has failed or refused to admit or otherwise appropriately respond to Notices to Admit and Interrogatories served on NYCHA.

5. Sherwin-Williams objects on the basis that NYCHA as plaintiff has the burden of proof on its claims and that the disclosure requests seek to impermissibly shift that burden onto Sherwin-Williams.

6. Sherwin-Williams objects to the disclosure requests because they seek information that is protected or privileged by the attorney-client privilege, the attorney work product privilege and the trial preparation privilege.

7. Sherwin-Williams objects to the disclosure requests because they are unlimited in time; Sherwin-Williams will respond for the time period from the date Sherwin-Williams was incorporated until 1960.

8. Sherwin-Williams objects to Notices to Admit 105, 106 and 110 through 142 because NYCHA has not been given leave to serve those notices. In addition, Sherwin-Williams objects to answering Interrogatories 1 through 3 except insofar as responsive information is identified in Sherwin-Williams' responses to the Notices to Admit.

OBJECTIONS TO DEFINITIONS

Objections to Definitions a, d, f, g, i, j, l and o. Sherwin-Williams objects to these definitions as overly broad, vague and ambiguous because it is not aware of the identity of "all divisions, facilities, associated and affiliated companies, subsidiaries, parents, holding companies, predecessors, successors, agents, employees, and persons presently or formerly acting on its behalf" with respect to the persons or entities purportedly encompassed by these Definitions and the neither the Definitions nor the Notices to Admit identify them.

Objections to Definitions b and m. Sherwin-Williams objects to NYCHA's definitions of "Defendant," "you" and "Sherwin-Williams" as overly broad, vague and ambiguous and will respond with respect to Sherwin-Williams' divisions, facilities and affiliated companies, to the extent known and as to which information is known regarding them.

Objections to Definitions h and n. Sherwin-Williams objects to NYCHA's definitions of "white lead pigment" as overly broad and ambiguous and will respond as to white lead carbonate pigment and white lead sulfate pigment, dry or in oil. Sherwin-Williams further objects to NYCHA's use of the term "lead-based paint" and "white lead paints" and will respond based on paints that contained more than one percent by total weight of white lead pigment.

RESPONSES TO REQUESTS FOR ADMISSION

1. You know of no evidence showing the total or partial amount of white lead carbonate made by SCM and/or Glidden and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects to the term "partial amount" because it is too vague to allow Sherwin-Williams to meaningfully respond. Without prejudice to this objection, Sherwin-Williams admits that it knows of no evidence showing the total amount of white lead carbonate made by SCM and/or Glidden and used in interior residential paints for any year from 1937 through 1954.

2. You know of no evidence showing the total or partial amount of white lead carbonate made by Sherwin-Williams and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects to the term "partial amount" because it is too vague to allow Sherwin-Williams to meaningfully respond. Without prejudice to this objection, Sherwin-Williams admits that it knows of no evidence showing the total amount of white lead carbonate made by Sherwin-Williams and used in interior residential paints for any year from 1937 through 1954. By way of further response, it is believed that virtually all of Sherwin-Williams' interior paints did not contain white lead pigments by no later than 1937. See, e.g., Affidavit of John Heitmann dated April 1, 1999 ("Heitmann Aff."), ¶¶ 16-19 and accompanying exhibits.

3. You know of no evidence showing the total or partial amount of white lead carbonate made by National Lead and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to National Lead.

4. You know of no evidence showing the total or partial amount of white lead carbonate made by John R. MacGregor Lead Co. and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to John R. MacGregor Lead Co.

5. You know of no evidence showing the total or partial amount of white lead carbonate made by IS&R and/or Anaconda and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to IS&R and/or Anaconda.

6. You know of no evidence showing the total or partial amount of white lead carbonate made by W.P. Fuller and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to W.P. Fuller.

7. You know of no evidence showing the total or partial amount of white lead carbonate made by Eagle-Picher and used in interior residential paints for any year from 1937 through 1954.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to Eagle-Picher.

8. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by SCM and/or Glidden from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 1 and restates it with respect to shipments to or sales in New York City.

9. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by Sherwin-Williams from 1937 through 1947 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 2 and restates it with respect to shipments to or sales in New York City. By way of further answer, it is believed that Sherwin-Williams made comparatively few shipments to or sales in New York City. See, e.g., Heitmann Aff., ¶¶ 91-96 and accompanying exhibits; Affidavit of Jerry A. Hausman dated April 1, 1999, ¶¶ 24-30 ("Hausman Aff.") and accompanying exhibits.

10. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by National Lead from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 3 and restates it with respect to shipments to or sales in New York City.

11. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by John R. MacGregor Lead Co. from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 4 and restates it with respect to shipments to or sales in New York City.

12. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by IS&R and/or Anaconda from 1937 through 1946 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 5 and restates it with respect to shipments to or sales in New York City.

13. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by W.P. Fuller from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 6 and restates it with respect to shipments to or sales in New York City.

14. You know of no evidence showing the total or partial amount of white lead carbonate made or sold by Eagle Picher from 1937 through 1954 that was shipped to or sold in New York City.

ANSWER:

Sherwin-Williams incorporates its objection and response to Notice to Admit No. 7 and restates it with respect to shipments to or sales in New York City.

15. You have no evidence that SCM and/or Glidden advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

16. You have no evidence that Sherwin-Williams advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

17. You have no evidence that National Lead advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

18. You have no evidence that John R. MacGregor Lead Co. advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

19. You have no evidence that IS&R and/or Anaconda advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

20. You have no evidence that W.P. Fuller advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

21. You have no evidence that the Lead Industries Association advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

22. You have no evidence that Eagle-Picher advertised or promoted the use of lead-based paints on children's toys or furniture during or after 1937.

ANSWER:

Admitted.

23. You have no evidence that SCM and/or Glidden intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

24. You have no evidence that Sherwin-Williams intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

25. You have no evidence that National Lead intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

26. You have no evidence that John R. MacGregor Lead Co. intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

27. You have no evidence that IS&R and/or Anaconda intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

28. You have no evidence that W.P. Fuller intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

29. You have no evidence that the LIA intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

30. You have no evidence that Eagle-Picher intimidated or otherwise discouraged the publication of studies concerning lead.

ANSWER:

Admitted.

31. You have no evidence that SCM and/or Glidden misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

32. You have no evidence that Sherwin-Williams misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

33. You have no evidence that National Lead misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

34. You have no evidence that John R. MacGregor Lead Co. misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

35. You have no evidence that IS&R and/or Anaconda misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

36. You have no evidence that W.P. Fuller misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

37. You have no evidence that the LIA misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

38. You have no evidence that Eagle-Picher misrepresented any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

39. You have no evidence that SCM and/or Glidden concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

40. You have no evidence that Sherwin-Williams concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

41. You have no evidence that National Lead concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

42. You have no evidence that John R. MacGregor Lead Co. concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

43. You have no evidence that IS&R and/or Anaconda concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

44. You have no evidence that W.P. Fuller concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

45. You have no evidence that the LIA concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

46. You have no evidence that Eagle-Picher concealed any potential risks to children concerning exposure to lead-based paint.

ANSWER:

Admitted.

47. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by SCM and/or Glidden.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

48. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Sherwin-Williams.

ANSWER:

Admitted.

49. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

50. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by John R. MacGregor Lead Co.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

51. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by IS&R and/or Anaconda.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

52. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by W.P. Fuller.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

53. You know of information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Eagle-Picher.

ANSWER:

Sherwin-Williams objects to this notice because it is ambiguous and unclear in that, contrary to the surrounding notices (which use the phrase "You know of no information"), this notice uses the phrase "You know of information." Sherwin-Williams responds as though this notice was intended to read as follows: "You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead pigment made by Eagle-Picher." Sherwin-Williams denies this Notice as restated. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

54. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by SCM and/or Glidden.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

55. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by Sherwin-Williams.

ANSWER:

Admitted.

56. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

57. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by John R. MacGregor Lead Co.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

58. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by W.P. Fuller.

ANSWER:

Specifically subject to and without prejudice to General Objections Nos. 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), this Notice to Admit is admitted based on information known at this time.

59. You know of no information indicating that NYCHA purchased or used at Williamsburg Houses any white lead paint made by Eagle-Picher.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

60. The only use, of which you have any information about, of any Sherwin-Williams' paint at Williamsburg Houses before 1955 was a gray buck primer used at Williamsburg Houses that contained lithopone and magnesium silicate as its pigments.

(0008-LGA-000001325)

ANSWER:

Admitted.

61. You know of no information indicating that SCM and/or Glidden bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

62. You know of no information indicating that Sherwin-Williams bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Admitted.

63. You know of no information indicating that National Lead bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Denied. *See, e.g.*, Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

64. You know of no information indicating that John R. MacGregor Lead Co. bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

65. You know of no information indicating that IS&R and/or Anaconda bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating,

inter alia, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

66. You know of no information indicating that W.P. Fuller bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4 (relating, inter alia, to loss, destruction or non-production of information), Sherwin-Williams admits this Notice at present.

67. You know of no information indicating that Eagle-Picher bid to sell lead-based paint or white lead pigment to NYCHA from 1937-1954.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

68. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of SCM and/or Glidden.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, inter alia, to loss, destruction or non-production of information).

69. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of Sherwin-Williams.

ANSWER:

Admitted.

70. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of National Lead.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

71. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of John R. MacGregor Lead Co.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information).

72. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of W.P. Fuller.

ANSWER:

Sherwin-Williams is unable to admit or deny this notice at present because it is not aware of the identity of all of the divisions or affiliates encompassed by this Notice and the Notice does not identify those divisions or affiliates. For this reason, Sherwin-Williams further objects that this Notice is vague and ambiguous. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information).

73. You know of no information indicating that NYCHA purchased or used any lead-based paint made by any division or affiliate of Eagle-Picher.

ANSWER:

Denied. See, e.g., Affidavit of Simon Chipkin dated March 30, 1999, ¶ 5; S-W Opp. Br. at n. 162 and accompanying text; Heitmann Aff., ¶¶ 92-95.

74. You know of no information indicating that NYCHA at any time from 1937-1954 purchased for or used on the interiors of Williamsburg Houses, lead-based paint made or sold by:

- (a) Amsterdam Color Works
- (b) M.J. Merkin

- (c) Thompson -Porcelite Paint Co.
- (d) Hoboken White Lead and Color Works
- (e) U.S. Gutta Percha
- (f) Muralo Co.
- (g) Nu-Enamel Corp.
- (h) Adelphi Paint and Color Works

ANSWER:

Sherwin-Williams objects that this Notice is vague and ambiguous in its use of the term "interiors." Specifically subject to and without prejudice to General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information), Sherwin-Williams states that it is aware that NYCHA specified or purchased (or planned to specify or purchase) paint for Williamsburg Houses from each of the identified entities, but is unable at present to admit or deny the specifics regarding such paint, including its composition or its ultimate use.

75. You have no evidence showing or suggesting that Dr. Joseph Aub at any time provided advice to any defendant that was in bad faith or not consistent with his professional judgment.

ANSWER:

Admitted.

76. You have no evidence showing or suggesting that Dr. Robert Kehoe at any time provided any defendant advice that was not in good faith or was not consistent with his professional judgment.

ANSWER:

Admitted.

77. Each of the following lead pigments was not used in residential interior paints purchased or used by NYCHA at Williamsburg Houses from 1937 to 1954:

- (a) lead silicate
- (b) leaded zinc oxide

- (c) leaded zinc
- (d) litharge
- (e) red lead
- (f) lead sulfate
- (g) chrome yellow
- (h) chrome orange
- (i) chrome green
- (j) lead phosphate

ANSWER:

Denied.

78. With respect to each apartment at Williamsburg Houses for which NYCHA seeks to recover damages:

- (a) defendant cannot identify the year of manufacture or sale of any interior lead-based paint allegedly present
- (b) defendant cannot identify the year of manufacture or sale of any white lead pigment in interior paint allegedly present
- (c) defendant cannot identify the year during which any interior lead-based paint present there was applied
- (d) not all layers of interior paint contained lead pigment
- (e) there was no white lead pigment in the outermost layer of paint on any interior surface

ANSWER:

Sherwin-Williams objects because this Notice does not identify the specific apartments "for which NYCHA seeks to recover damages" and therefore Sherwin-Williams is unable to

admit or deny this Notice. Sherwin-Williams additionally incorporates General Objections 1 through 4 (relating, *inter alia*, to loss, destruction or non-production of information).

79. During the 1990s, you know of only three Department of Health reports of children who had elevated blood levels while living at Williamsburg Houses.

ANSWER:

Sherwin-Williams admits only that it knows of, at most, three reports of children with elevated blood levels while living at Williamsburg Houses, but denies that such reports linked the elevated blood levels to exposure to lead-based paint or white lead pigment, and Sherwin-Williams is further aware of reports that no children living at Williamsburg Houses had elevated blood levels.

80. You have no evidence that any type of lead pigment other than white lead pigment was applied to the interior walls of apartments at Williamsburg Houses.

ANSWER:

Denied.

81. You have no evidence that any type of lead pigment other than white lead pigment was applied to the door frames of apartments at Williamsburg Houses.

ANSWER:

Denied.

82. You have no evidence that any type of lead pigment other than white lead pigment was applied to the baseboards of apartments at Williamsburg Houses.

ANSWER:

Denied.

83. You have no evidence that any type of lead pigment other than white lead pigment was applied to the bathroom doors of apartments at Williamsburg Houses.

ANSWER:

Denied.

84. You have no evidence that any type of lead pigment other than white lead

pigment was applied to the heat risers of apartments at Williamsburg Houses.

ANSWER:

Denied.

85. You have no evidence that any type of lead pigment other than white lead pigment was applied to the window headers of apartments at Williamsburg Houses.

ANSWER:

Denied.

86. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to the interior walls of Williamsburg Houses.

ANSWER:

Denied. Based on the available information regarding NYCHA purchasing and specification practices, it is believed that a specific manufacturer was identified and approved at the time of purchase.

87. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any interior walls of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

88. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to any door frames inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

89. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any door frames inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

90. You have no evidence that any specific manufacturer of white lead-based paint produced any white lead paint that was applied to any baseboards inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

91. You have no evidence that any specific manufacturer of white lead pigment produced any white lead pigment applied to any baseboards inside apartments of Williamsburg Houses.

ANSWER:

Sherwin-Williams' response to Notice to Admit No. 86 is incorporated in full.

92. Sherwin-Williams, ODP White Lead Use Instruction (SW 5052; included in Exh. 154 of Plaintiff's Affidavits in support of the December 31, 1998 motion) contains a 1941 date code.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the interpretation requested by this Notice, but specifically reserves the right to amend or supplement this response.

93. At some time during the period 1940-47, Sherwin-Williams recommended or promoted the use of its ODP white lead for interior surfaces.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "recommended or promoted" or "interior surfaces" adequately and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible

document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response.

94. During the 1951-54 time period, the labels of some Sherwin-Williams' Lowe Brothers' paints containing white lead carbonate (32 SWP 16309-10, 32 SWP 16315-16 included in Exh. 157 of Plaintiff's Affidavits) indicated that the paint could be used "For Exterior or Interior Use".

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, including whether the indicated labels were ever actually used on paints sold to the public, but specifically reserves the right to amend or supplement this response. By way of further response, Sherwin-Williams denies that the referenced documents contain the quoted phrase and further states that the documents contain statements that the products are "especially designed for priming exterior surfaces."

95. Sherwin-Williams published an article entitled "Dangers of White Lead" in the July 1904 issue of The SWP. (Exh. 9 of Plaintiffs' Affidavits).

ANSWER:

Sherwin-Williams objects that this Notice is not relevant to NYCHA's claims, but otherwise admits this Notice.

96. In a report entitled "An Industrial Hygiene Survey of the Kensington Plant of the Sherwin-Williams Company," Sept. 1, 1937 to Nov. 15, 1937, Dr. Carey P. McCord wrote to Sherwin-Williams that "a useful purpose has been served through the substitution of [lithopone] or other non-lead paint in the painting of the interiors of nurseries, kindergartens, etc., where some danger existed that immature persons might chew up flaked off lead, etc." (7-SWP-30455 included in Exh. 151 of Plaintiff's Affidavits).

ANSWER:

Sherwin-Williams objects that this Notice is not relevant to NYCHA's claims, but otherwise admits only that the referenced document contains the following statement: "a useful purpose has been served through the substitution of this paint or other non-lead paint in the painting of the interiors of nurseries, kindergartens, etc., where some danger existed that

immature persons might chew up flaked off lead, etc." Sherwin-Williams is unable to otherwise admit or deny this Notice.

97. Sherwin-Williams made paints containing white lead carbonate for use on interior surfaces after receiving this report from Dr. McCord.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "paints containing white lead carbonate" or "interior surfaces" and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice as stated because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response. Notwithstanding this objection and response, Sherwin-Williams admits only that it is aware of certain formula cards produced to NYCHA regarding paints with white lead carbonate pigment in the formula and that indicate certain interior or exterior uses, but Sherwin-Williams is not aware whether or the extent to which such paints were made or sold, or the use for which such paints were made or sold. As indicated in response to Notice No. 2, which is incorporated by reference, Sherwin-Williams believes that virtually all of its interior paints did not contain lead pigment by 1937 at the latest. Sherwin-Williams specifically reserves the right to amend or supplement this response.

98. Sherwin-Williams continued to recommend using ODP white lead on interior surfaces after receiving this report from Dr. McCord.

ANSWER:

Sherwin-Williams objects because this Notice does not adequately define the terms "recommend" or "interior surfaces" adequately and therefore Sherwin-Williams cannot admit or deny this Notice. Furthermore, Sherwin-Williams is unable to admit or deny this Notice because it is not aware of anyone with personal knowledge of, or any admissible document that states, the facts requested by this Notice, but specifically reserves the right to amend or supplement this response.

99. Dr. John A. Heitmann's statement in his affidavit in Brenner v. American Cyanamid that Sherwin-Williams had "ceased making interior lead paints even before the risk to children became known to it" is not accurate.

ANSWER:

Denied.

100. In 1944 or 1945, IS&R and/or Anaconda distributed or circulated "The Story of Anaconda Electrolytic White Lead." (PNYC00000001-PNYCO00000022).

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

101. You have no evidence that Glidden participated in the Forrest Products - Better Paint Campaign.

ANSWER:

Specifically subject to and without prejudice to General Objections 1 through 4, this Notice is admitted at present.

102. As early, as 1924, Glidden manufactured, advertised, and sold a lead free paint known as "Zinc-O'Lith" which it advertised as non-poisonous.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

103. John R. MacGregor Lead Co. did not produce or sell white lead pigments in any year prior to 1938.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

104. You know of no evidence showing the percentage or any amount of white lead pigment made or sold by John R. MacGregor Lead Co. in any year from 1937 through 1954.

ANSWER:

Sherwin-Williams objects because this Notice is vague and ambiguous in that it does not define the term "percentage." Without prejudice to this objection, this Notice is denied.

105. John R. MacGregor Lead Co. produced red lead pigment.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

106. A company owned by American Cyanamid produced the following products:

- (a) chrome yellow
- (b) chrome green
- (c) chrome orange and/or
- (d) chrome red

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8. Sherwin-Williams also objects because this Notice does not identify the "company" to which it refers.

107. Glidden, Sherwin-Williams, National Lead, John R. MacGregor Lead Co., IS&R and/or Anaconda, W.P. Fuller, and Eagle Pitcher account for one hundred percent of the white lead pigment produced in the United States for the period from 1937 through 1954.

ANSWER:

Denied.

108. You know of no evidence that white lead pigment manufactured by W.P. Fuller was used in any product applied to interior residential surfaces in the State of New York for any year from 1937-1954.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

109. You have no evidence showing that white lead pigment manufactured by W.P. Fuller was used in paint manufactured by someone other than W.P. Fuller.

ANSWER:

Sherwin-Williams is unable to admit or deny this Notice because it does not possess sufficient facts.

110. At some point during the 1940s, the John R. MacGregor Lead Co. participated in the LIA's White Lead Promotional Campaign.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

111. At some point during the 1950s, Glidden promoted the use of white lead pigment for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

112. At some point during the 1950s, National Lead promoted the use of white lead pigment for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

113. At some point during the 1950s, the LIA promoted the use of white lead pigment and/or paint containing white lead for use on interior surfaces.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

114. LIA has never produced, manufactured, or caused to be produced:

- (a) white lead pigments
- (b) white lead paints
- (c) white lead-in-oil
- (d) lead-based paints
- (e) any lead pigment

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

115. You have no information of the text of the proposed legislation or proposed

regulation which was the subject matter of any of the defendant's lobbying activity:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

3/115A. You do not have any information of the actual (verbatim) words spoken by any defendant's employee, board member or agent to any government official or legislator in connection with LIA's alleged lobbying activities:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955
- (e) in New York City in 1954

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

116. You do not have a transcript of any oral statement or a copy of any written statement made to or given to any government official or legislator by any defendant's employee, agent, or board member in connection with LIA's alleged lobbying activities:

- (a) in Massachusetts in 1933
- (b) in California in 1945
- (c) in Maryland in 1950
- (d) in the State of New York in 1955

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

117. Other than the documents produced by defendants or included in NYCHA's exhibits, you have no other information about communications between the LIA and legislators and/or officials of the following governmental entities concerning any enacted or proposed lead-based paint or lead pigment law or regulation:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Massachusetts
- (h) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

118. In regard to the following entities, you have no information suggesting that any defendant's lobbying of legislators or government officials concerning any enacted or proposed lead pigment or lead-based paint law or regulation was conducted in an illegal or in an unethical manner:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California

- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

119. In regard to the following entities, you have no information suggesting that any defendant's lobbying of government officials concerning any enacted or proposed lead pigment or lead-based paint law or regulation was conducted in other than a legally permissible manner:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

120. In regard to the following entities, you have no information suggesting that any of

the defendants misrepresented any fact to any governmental official or legislator during its lobbying activities in connection with any enacted or proposed lead pigment or lead-based paint regulation or law:

- (a) United States government
- (b) State of New York
- (c) City of New York
- (d) State of California
- (e) State of Maryland
- (f) City of Baltimore
- (g) Commonwealth of Pennsylvania
- (h) City of Philadelphia
- (i) Commonwealth of Massachusetts
- (j) any other state or municipality

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

121. The LIA failed to inform the public about all that it knew about the health risks posed to children from exposure to lead-based paint during the following time periods:

- (a) 1928 through 1937
- (b) 1938 through 1948
- (c) 1949 through 1954
- (d) 1955 through 1960

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

122. Unlike the 1937 LIA Conference on Lead Poisoning, the 1946 LIA Conference on

Lead Poisoning was cosponsored by the LIA and the American Medical Association.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

123. During the period 1928 to 1954, the LIA never promulgated industry-wide specifications for the manufacture or production of the following items:

- (a) white lead pigments
- (b) white lead paints
- (c) white lead-in-oil
- (d) lead-based paints
- (e) any lead pigments

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

124. At some point during the 1928 to 1954 period, at least one of the following defendants or entities delegated responsibility for researching the health hazards of lead to the LIA:

- (a) National Lead Company
- (b) The Sherwin-Williams Company
- (c) The Glidden Company
- (d) IS&R and/or Anaconda
- (e) W.P. Fuller & Co.
- (f) John R. MacGregor Lead Company
- (g) Eagle-Picher Industries, Inc.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

125. At some point during the 1928 to 1954 period, at least one of the following defendants or entities delegated responsibility for developing warnings for lead-based paint products to the LIA:

- (a) National Lead Company
- (b) The Sherwin-Williams Company
- (c) The Glidden Company
- (d) IS&R and/or Anaconda
- (e) W.P. Fuller & Co.
- (f) John R. MacGregor Lead Company
- (g) Eagle-Picher Industries, Inc.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

126. Defendant has no information indicating that no tenant in any of NYCHA's housing units ever read any article on white lead pigment or white lead-based paint in or reprinted from "Lead Magazine."

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

127. Defendant has no information indicating that no employee or official of NYCHA ever read any article on white lead pigment or white lead-based paint in or reprinted from "Lead Magazine."

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

128. Defendant has no evidence indicating that no employee or official of NYCHA ever read any article, book or pamphlet written or published by the LIA which is referred to in the Markowitz and Rosner Affidavit.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

129. Defendant has no evidence indicating that no employee or official of NYCHA ever read any advertisement dealing with white lead pigment or white lead-based paints published by the LIA in any newspaper, periodical or magazine.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

130. Defendant has no evidence indicating that no employee or official of NYCHA ever read any of the advertisements referred to in the Markowitz and Rosner Affidavit which were placed in magazines, newspapers and periodicals by the LIA.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

131. Dr. Robert Kehoe of the Kettering Institute in Cincinnati, Ohio was a leading researcher in the United States in lead poisoning from the 1930's through the 1950's.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

132. Defendant has no evidence that any part of Dr. Robert Kehoe's research which was partially or wholly funded by contributions from the LIA was conducted in any way other than in accordance with accepted scientific research standards.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

133. The LIA or an LIA official threatened to sue Dr. Randolph Byers during the 1940s.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

134. At times from the late 1940's to the 1960's the LIA provided funds to Dr. Randolph Byers for his research into the health effects of lead on the human body and on children.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

135. There is at least circumstantial evidence suggesting that Dr. Randolph Byers' research on the health effects of lead was influenced by LIA's funding.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

136. You have no information suggesting that during the 1934-40 period the LIA ever informed any NYCHA employee or official about any potential risks posed to children from exposure to lead-based paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

137. From 1930 and from then on after, the LIA recommended that owners of cribs, toys and children's furniture not repaint such items with lead-based paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

138. In or about 1933, the LIA's Felix Wormser informed Drs. McKhann and Vogt that crib and toy manufacturers had been informed about the dangers of childhood lead poisoning. (Exh. 34 to NYCHA's Affirmation).

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

139. In 1934 and thereafter, the LIA recommended that manufacturers of children's toys and furniture not use lead-based paint on children's toys and furniture.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

140. You have no evidence that demonstrates that the LIA, during the 1930s or 1940s ever told Glidden and/or Sherwin-Williams to stop promoting lead-based paints for use on children's toys or furniture.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

141. There were no laws or regulations prohibiting the sale of white lead pigment or lead-based paint in the City of New York and State of New York until 1959.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

142. Between 1937 and 1954 companies which manufactured lead-based paint for interior residential use did not always list lead as an ingredient on the labels of their cans of interior paint.

ANSWER:

Sherwin-Williams incorporates its General Objection No. 8.

RESPONSE TO INTERROGATORY NO. 1

(a) Set forth all facts which you contend support your responses; (b) identify every person who has knowledge or information which you contend supports your responses and (c) produce every document which you contend supports your responses.

ANSWER:

Sherwin-Williams incorporates its General Objection Nos. 1 through 8. Where appropriate, Sherwin-Williams has provided additional information in its responses to the Notices to Admit.

RESPONSE TO INTERROGATORY NO. 2

Set forth all facts supporting the LIA's claim in it Notices to Admit No. 16 that the question of "warnings on lead-base paints was a subject of public debate and of proposed legislation or regulation" during the 1920s.

ANSWER:

Sherwin-Williams objects because this Interrogatory does not appear to be directed to Sherwin-Williams and therefore does not appear to seek a response from it. Sherwin-Williams incorporates its General Objection Nos. 1 through 8.

RESPONSE TO INTERROGATORY NO. 3

State forth all facts supporting the LIA's claim in it Notices to Admit No. 57 that in 1930 "the LIA recommended that owners of cribs, toys and children's furniture not repaint such items with lead-based paint."

ANSWER:

Sherwin-Williams objects because this Interrogatory does not appear to be directed to Sherwin-Williams and therefore does not appear to seek a response from it. Sherwin-Williams incorporates its General Objection Nos. 1 through 8.

Dated: April 12, 1999

THE SHERWIN-WILLIAMS COMPANY,

By its attorneys,

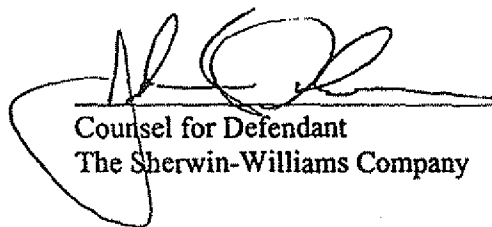
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Responses of the Sherwin-Williams Company to New York City Housing Authority's March 1999 Notices to Admit and Interrogatories to All Defendants was served by express, overnight courier on John R. Low-Beer, counsel for the New York City Housing Authority, and was mailed by U.S. mail, postage prepaid, to the remaining counsel on the attached service list on April 12, 1999.



Counsel for Defendant
The Sherwin-Williams Company

Attachment

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK, THE NEW YORK
CITY HOUSING AUTHORITY, and THE NEW
YORK CITY HEALTH AND HOSPITALS
CORPORATION,

Plaintiffs,

- against -

LEAD INDUSTRIES ASSOCIATION, INC., NL
INDUSTRIES, INC., EAGLE-PICHER
INDUSTRIES, INC., ATLANTIC RICHFIELD
COMPANY, THE SHERWIN-WILLIAMS
COMPANY, SCM CORPORATION, THE
GLIDDEN COMPANY, AMERICAN
CYANAMID and FULLER-OBRIEN
CORPORATION,

Defendants.

Index No. 14365/89

IAS Part 39
Justice Freedman

Referee Roberts

DEFENDANT THE
SHERWIN-WILLIAMS
COMPANY'S RESPONSES
TO PLAINTIFFS'
DECEMBER 1998
INTERROGATORIES

-----X
In accordance with the Referee's Pretrial Order No. 40, The Sherwin-Williams Company ("Sherwin-Williams") provides these supplemental responses to Plaintiffs' December 1998 Interrogatories. These responses are subject to, limited by and without waiver of Sherwin-Williams' Objections to Disclosure, which are set forth following Sherwin-Williams' previous responses and are incorporated into these responses, and its prior responses.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

Sherwin-Williams is responding based on Referee's Pretrial Order No. 40, which provided Sherwin-Williams with five business days to respond to interrogatories that plaintiffs served at approximately 6 p.m. on December 3. Sherwin-Williams has undertaken a good faith and diligent effort to provide responses.

The microfilmed financial documents addressed by these interrogatories involve the time period from approximately 1929 through 1949. Accordingly, the documents are approximately 50 to 70 years old. A 20-year old clerk working with the most recent of these ledgers at the time they were created (1949) would be almost 70 years old today. Sherwin-Williams has not yet located any current or former employee (or any other person) with personal knowledge of these ledgers. In addition, these ledgers relate to products that have long since been discontinued.

Due to the age of the documents and absence of context or witnesses, these responses are not based on the personal knowledge of any witness. Accordingly, Sherwin-Williams reserves the right to object to the use or admission of these responses at any trial or evidentiary proceeding. These responses are based on inferences from or interpretations of the documents, along with assumptions and estimates. Sherwin-Williams has made a good-faith effort to respond under these circumstances. Sherwin-Williams further expressly reserves, however, the right to correct or amend its responses if it learns that they are incorrect, incomplete or otherwise require further explanation, and to present, if necessary, expert testimony to interpret or explain the documents. All of these responses are subject to these reservations.

The following interrogatories pertain to exhibit A.

1. Does the chart heading "Gross Sales" include:
 - (a) Sales to parties unrelated to Sherwin-Williams?
 - (b) Sales to Sherwin-Williams' paint divisions or any of Sherwin-Williams' affiliated companies including but not limited to Martin-Senour, Acme, Lowe Brothers, or Lucas?
 - (c) Sales to paint stores owned by Sherwin-Williams or any of its affiliates?

RESPONSE NO. 1:

(a) It presently is believed to include sales to parties unrelated to Sherwin-Williams.

(b) It presently is believed to include sales to Sherwin-Williams paint divisions or plants and sales to Sherwin-Williams affiliates for the time period encompassed by the ledger (1936-1937). The specific divisions, plants and/or affiliates encompassed by the ledger are not presently known.

(c) It presently is believed to include sales to paint stores owned by Sherwin-Williams or its affiliates during the time period encompassed by the ledger.

2. State what units the numbers in these charts refer to (e.g., dollars, tons or pounds).

RESPONSE NO. 2:

It presently is believed that the numbers refer to dollars.

3. With respect to the headings "Purchased Carbonate," "Purchased Litharge," and "Purchased Red Lead":

(a) Does the ledger reflect Sherwin-Williams' purchases of carbonate, litharge, and red lead from parties unrelated to Sherwin-Williams? If these headings refer to such purchases, please indicate whether this Gross Sales chart provides information concerning Sherwin-Williams' sales of these products produced by unrelated parties.

(b) Does this ledger reflect purchases made by Sherwin-Williams or any of its affiliated companies from Sherwin-Williams' Chicago white lead plant or factory?

(c) Does this ledger concern carbonate, litharge, or red lead produced by Sherwin-Williams?

RESPONSE NO. 3:

(a) It presently is believed that the ledger reflects sales of products purchased by Sherwin-Williams from persons or entities unrelated to Sherwin-Williams. The extent to which such persons or entities are "parties" to this action is not presently known, if that is the meaning intended by plaintiffs in this interrogatory.

(b) It presently is believed that the "Purchased Carbonate" heading reflects sales of lead carbonate purchased by the Sherwin-Williams Chicago white lead plant from persons or entities unrelated to Sherwin-Williams. The identities of the persons or entities that purchased the lead carbonate from the Chicago white lead plant are not presently known.

(c) It presently is believed that the "Purchased Carbonate," "Purchased Litharge" and "Purchased Red Lead" headings do not reflect products produced by Sherwin-Williams or its affiliates.

4. Does the heading "Carbonate Lead" refer to basic carbonate dry white lead? If it does not, state what product it concerns.

RESPONSE NO. 4:

It presently is believed that the heading refers to dry carbonate lead. Further details regarding the properties of the carbonate to which this heading refers are not presently known.

5. Does the heading "ODP Lead" refer only to white lead in-oil? If it does not, state the product(s) it references.

RESPONSE NO. 5:

It presently is believed that the heading "ODP Lead" refers to double-refined, desilverized corroding lead ground in refined linseed oil, also known as white lead in oil. (See, e.g., 7-SWP-11).

6. Identify the product referred to as "Zilo." State whether it is a leaded zinc oxide.

RESPONSE NO. 6:

It presently is believed that the heading "Zilo" refers to a mixture of lead carbonate, lead sulphate, zinc oxide and refined linseed oil. (See, e.g., 7-SWP-41135). Zilo is not "a leaded zinc oxide." It presently is believed that, for the time period 1936-1937, Zilo was a product that contained some leaded zinc oxide as one of its ingredients.

7. State separately whether the headings that refer to "Lowe Bros. Special," "BW 102" and "BW 103" concern white lead-in-oil. If any of these products are not white lead-in-oil, indicate what products are being described.

RESPONSE NO. 7:

BW 103 presently is believed to have been basic white lead carbonate in oil. BW 102 presently is believed to have been basic white lead carbonate paste. "Lowe Bros. Special" presently is believed to have been a type of soft paste lead, but the specific components of this product are not presently known.

The following interrogatories pertain to exhibit B.

8. Explain the meaning of the heading "Purchased Dry White Lead."

RESPONSE NO. 8:

The heading "Purchased Dry White Lead" presently is believed to indicate amounts and costs for dry white lead that Sherwin-Williams purchased from persons or entities not affiliated with Sherwin-Williams.

9. Explain the meaning of the numbers under the column "Ref."

RESPONSE NO. 9:

The numbers appear to be accounting references. The meaning of the numbers is not presently known.

10. For the next two columns of numbers, state what units the numbers refer to (e.g., pounds, tons, or dollars).

RESPONSE NO. 10:

It presently is believed that the second column of numbers refers to pounds and the third column of numbers refers to dollars.

The following interrogatories pertain to exhibit C.

11. Explain what is meant by "Prepaid Carbonate Account."

RESPONSE NO. 11:

It presently is believed that the ledger refers to a payment of \$10,608 in December 1937 by an entity known as "Cook P & V" and to shipments of lead carbonate to Cook P & V in June, February and March 1938.

12. What do the columns of numbers represent?

RESPONSE NO. 12:

The first column of numbers appears to contain accounting references, the meanings of which are presently unknown. The second column of numbers presently is believed to indicate pounds of carbonate shipped. The third column of numbers presently is believed to indicate the dollar value of pounds shipped. The fourth column of numbers appears to contain an accounting reference, the meaning of which is presently unknown. The fifth column of numbers presently is believed to indicate pounds of carbonate shipped. The sixth column of numbers presently is believed to indicate dollars received based on the pounds shipped.

The following interrogatories pertain to exhibit D.

13. What does this "Loss and Gain" ledger refer to?

RESPONSE NO. 13:

It presently is believed that this ledger is an accounting document reflecting the loss and gain on operations of the Chicago white lead plant for the year ending August 31, 1937.

14. Explain what is being represented by the left and right halves of this ledger.

RESPONSE NO. 14:

The left half of the ledger reflects debit entries and the right side reflects credit entries. The items and time periods for which the entries are made and the corresponding dollar amounts of the entries appear to be indicated on the ledger.

15. Identify what product Rx152 is.

RESPONSE NO. 15:

It presently is believed that Rx152 refers to special soft paste lead -- Lowe Bros. Company.

The following interrogatories pertain to exhibit E.

16. Explain the meaning of the heading "Pulp Lead in Water."

RESPONSE NO. 16:

It presently is believed that the heading refers to a material known as pulp lead in water. Further information regarding the details of this material are not presently known.

17. Explain the meaning of the numbers under the columns "Ref."

RESPONSE NO. 17:

The columns of numbers appear to contain accounting references, the meanings of which are presently unknown.

18. Explain the meaning of:

(a) "Pkgs."

(b) "System"

(c) "G. B."

For the next two columns of numbers, state what units the numbers refer to (e.g., pounds, tons, or dollars).

RESPONSE NO. 18:

(a) "Pkgs." presently is believed to indicate the term "Packages." It presently is believed to refer to the cost of packaging.

(b) "System" presently is believed to refer to the system account, which presently appears to reflect the materials and costs in the carbonate production process.

(c) "G. B." presently is believed to refer to general burden.

The left column presently is believed to be pounds and the right column presently is believed to be dollars.

19. Explain the meaning of the right half of this ledger.

RESPONSE NO. 19:

The right half presently is believed to be credits from the pulp lead in water account to the manufactured merchandise account.

The following interrogatories pertain to exhibit F.

20. Explain what is meant by "Manufacturing Account."

RESPONSE NO. 20:

It presently is believed that this account shows the accumulation of costs associated with the raw materials used in making ODP white lead.

21. The left and right halves of these ledgers each contain two columns of numbers. State for each column, what units the numbers refer to (e.g., pounds, tons, or dollars).

RESPONSE NO. 21:

The left column presently is believed to be pounds and the right column presently is believed to be dollars.

22. What are "ODP Manufacturing Account # 1", "Lead in Oil Mfd. Account # 2", and "Lead in Oil Mfg. Account # 3", and explain the relationship, if any, among them.

RESPONSE NO. 22:

ODP Manufacturing Account #1 has been described. See response to Interrogatory No. 20. "Lead in Oil Mfd. Account #2" presently is believed to reflect indirect costs added to the cost of production reflected in ODP Manufacturing Account #1. "GB" presently is believed to refer to general burden. The meaning of MGP is not known at present. "Lead in Oil Mfg. Account #3" presently is believed to reflect indirect costs added to the cost of production reflected in "Lead in Oil Mfd. Account #2."

23. State the meaning of the following terms:

- (a) "Fowd"
- (b) "L.O."
- (c) "Inv."
- (d) "MGP"

RESPONSE NO. 23:

- (a) "Fowd" presently is believed to indicate "balance forward."
- (b) "L.O." presently is believed to indicate linseed oil.
- (c) "Inv." presently is believed to indicate "Inventory."
- (d) The meaning of "MGP" is not presently known.

The following interrogatories pertain to Exhibit G.

24. Explain the meaning of the heading "Production, Merchandise & Trading and Loss & Gain Account."

RESPONSE NO. 24:

It presently is believed that this ledger is an accounting document reflecting the loss and gain on operations of the Chicago white lead plant for the year ending August 31, 1935.

25. Explain the meaning of the left and right halves of this ledger.

RESPONSE NO. 25:

The left half of the ledger reflects debit entries and the right side reflects credit entries. The items and time period for which the entries are made and the corresponding dollar amounts of the entries appear to be indicated on the ledger.

The following interrogatories pertain to exhibit H.

26. Explain the meaning of the heading "Mfg. Mdse. Carbonate."

RESPONSE NO. 26:

This heading is for a ledger that presently is believed to indicate the weight of, and accumulated cost associated with, the production of lead carbonate for the year ending August 31, 1937.

27. The left half of the ledger contains two columns of numbers. State for each column, what units the numbers refer to (e.g., pounds, tons, or dollars).

RESPONSE NO. 27:

The left column presently is believed to be pounds and the right column presently is believed to be dollars.

28. Define the term "1251" as used in this ledger.

RESPONSE NO. 28:

"1251" presently is believed to refer to a material known as pulp lead in water.

29. Define the term "Mfd" as used in this ledger.

RESPONSE NO. 29:

This presently is believed to be a reference to lead carbonate as indicated on the drying, pulverizing and packing #2 ledger.

30. Define the term "To ODP" as used in this ledger.

RESPONSE NO. 30:

This presently is believed to reflect the weight and cost of goods transferred to the ODP Manufacturing Account #1.

31. Define the term "Retd to System" as used in ledger.

RESPONSE NO. 31:

This presently is believed to reflect the weight and cost of goods returned to the system account.

32. Explain the meaning of the circle around the numbers that concern "Retd to System," "To ODP," and "To Litharge," and describe what such or similar circles indicate in Sherwin-Williams' bookkeeping or accounting records.

RESPONSE NO. 32:

Sherwin-Williams objects to the extent this interrogatory involves any ledger other than the referenced exhibit on the basis that it is vague, ambiguous and lacking sufficient foundation. The meaning of the circles indicated on Exhibit H is presently unknown.

33. Explain what "To Loss & Gain Acct" means.

RESPONSE NO. 33:

It presently is believed that this is an accounting entry transferring the cost of lead carbonate sold to the loss and gain account.

The following interrogatories pertain to exhibit I.

34. Explain what the heading "Consolidated District Sales" means.

RESPONSE NO. 34:

The meaning of this heading is presently unknown.

35. What does "Trade" mean?

RESPONSE NO. 35:

It presently is believed to stand for trade sales, which presently is believed to include sales to a variety of entities, including but not limited to merchants and jobbers, architects and contractors.

36. What does "MSD" mean?

RESPONSE NO. 36:

It presently is believed to stand for manufacturer's sales, which is believed to include sales to a variety of entities, including but not limited to manufacturers who use paint in producing finished products that are painted, automobile repair shops. It is not presently believed to include sales to paint manufacturers.

37. What does "Ry." mean?

RESPONSE NO. 37:

It presently is believed to stand for Railway, Street Railway and Marine Sales, which is believed to include sales to a variety of entities, including but not limited to steam railroads, steamship lines, coal producers and the United States government.

The following interrogatories pertain to exhibit J (7 SWP-31689-90).

38. What does "Consolidate Consumption of Raw Materials" refer to?

RESPONSE NO. 38:

It presently is believed to refer to the consumption of the indicated raw materials for the indicated years in the indicated amounts by Sherwin-Williams, Martin-Senour, Detroit White Lead Works and Acme White Lead & Color Works.

39. Does the heading "white lead", as used in this chart, refer to dry white lead carbonate? Identify any other product(s) that this heading is referring to.

RESPONSE NO. 39:

It presently is believed to refer to dry white lead carbonate.

40. State whether all or most of this white lead was produced by Sherwin-Williams.

RESPONSE NO. 40:

The portion of white lead carbonate produced by Sherwin-Williams is not indicated by Exhibit J and is not known at present.

The following interrogatories pertain to exhibit K.

41. What does "Devoc & Reynolds Co. Prepayment A/C" refer to?

RESPONSE NO. 41:

It presently is believed that the ledger refers to a payment of \$54,681.47 before August 1, 1934 by Devoe & Reynolds Co. for unknown goods to be received at a later date, and to shipments of such goods to Devoe & Reynolds between October 1, 1934 and March 31, 1935.

42. State what units the columns of numbers refer to (e.g., dollars, tons or pounds).

RESPONSE NO. 42:

The first column of numbers appears to indicate accounting references that are not presently known. The second, third and fourth columns of numbers appear to refer to dollars.

43. Explain what is being represented by this ledger.

RESPONSE NO. 43:

See Response No. 41.

The following interrogatories pertain to exhibit L.

44. Explain what the heading "January Recapitulation" means.

RESPONSE NO. 44:

It is not presently known whether the ledger indicates sales or shipments. It presently is believed to be the heading of an accounting ledger summarizing quantities of lead in oil shipped or sold, by destination and package size, for the one-month period ending January 31, 1930.

45. State whether the transactions described in this exhibit are sales within the Sherwin-Williams Company, are sales to Sherwin-Williams owned stores, and/or are sales outside the Sherwin-Williams Company.

RESPONSE NO. 45:

It is not presently known whether the ledger indicates sales or shipments. The identity and affiliation of the persons or entities to whom the products were shipped or sold are not presently known.

46. Explain the headings "Diff." and "Amount."

RESPONSE NO. 46:

The precise meanings of these terms are not presently known. It presently is believed that "Diff." stands for "differential" and might relate to the destination of sales or shipments. The term "Amount" presently is believed to indicate an extension based on the differential.

47. Explain why 30% is deducted from the bottom of the first column of numbers.

RESPONSE NO. 47:

The reason for the 30% reduction is not presently known.

The following interrogatories pertain to exhibit M.

48. Explain what the heading "National Lead -Suspense" means.

RESPONSE NO. 48:

This heading is believed to represent debit and credit transactions involving National Lead that had not yet been transferred into operating accounts as of the date of the entries on Exhibit M.

49. Explain the term "suspense account" that was used in Sherwin-Williams' ledgers.

RESPONSE NO. 49:

Sherwin-Williams objects to the extent this interrogatory involves any ledger other than the referenced exhibit on the basis that it is vague, ambiguous and lacking sufficient foundation. As used in Exhibit M, the term appears to indicate transactions involving National Lead that had not yet been transferred into operating accounts as of the date of the entries.

50. State what units the columns of numbers refer to (e.g., pounds, tons, or dollars).

RESPONSE NO. 50:

The first column of numbers appears to be accounting references, some of which appear to indicate purchase orders. The references in the second, third, sixth and seventh columns of numbers are not presently known. The fifth column of numbers appears to be accounting references, the meanings of which are not presently known. The fourth and eighth columns of numbers presently are believed to indicate dollars.

51. Explain the meaning of the left and right halves of the ledger.

RESPONSE NO. 51:

The left half of the ledger is believed to indicate debits and the right half is believed to indicate credits. Dollar amounts and the time periods for which they were recorded appear to be reflected on the ledger. The nature of the transactions being reflected is not presently known.

The following interrogatories pertain to exhibit N (7-SWP-17133).

52. Explain the meaning of the term "Paint and Varnish Factory Balances."

RESPONSE NO. 52:

It presently is believed to indicate costs and/or expenses incurred by the referenced paint and varnish factories for the time period indicated.

53. Explain the meaning of the term "Auxiliary Factory Balances."

RESPONSE NO. 53:

It presently is believed to indicate costs and/or expenses incurred by the referenced auxiliary factories for the time period indicated.

54. Explain the meaning of the term "District Balances."

RESPONSE NO. 54:

It presently is believed to indicate costs and/or expenses incurred by the referenced districts for the time period indicated.

The following interrogatory pertains to exhibit O (7-SWP-12692).

55. Explain the meaning of the heading "Carbonate Charged to Mfd. Mdse."

RESPONSE NO. 55:

It presently is believed to be the heading of an accounting ledger summarizing quantities of carbonate charged to manufactured merchandise either shipped or sold, by destination and package size, for the one-month period ending September 30, 1929.

The following interrogatories pertain to exhibit P (7-SWP-13190).

56. Explain the meaning of the term "National Lead Adjustment Account."

RESPONSE NO. 56:

The meaning of this term is not presently known.

57. Define the term "adjustment account" as used in Sherwin-Williams' bookkeeping and accounting records.

RESPONSE NO. 57:

Sherwin-Williams objects to the extent this interrogatory involves any ledger other than the referenced exhibit on the basis that it is vague, ambiguous and lacking sufficient foundation. The term "adjustment account" as used in Exhibit P presently is believed to indicate an account in which a record is kept of adjustments to figures maintained in a separate account.

58. What product does this exhibit concern?

RESPONSE NO. 58:

The product or products to which Exhibit P refers is presently unknown.

The following interrogatories pertain to exhibit Q.

59. Explain the meaning of the heading "Mfd. Merchandise Carbonate Purchased."

RESPONSE NO. 59:

It presently is believed that the ledger reflects the cost and weight of sales or shipments of lead carbonate purchased by the Sherwin-Williams Chicago white lead plant during the period May 1, 1935 through August 31, 1935 from persons or entities unrelated to Sherwin-Williams.

60. Explain the meaning of "DR."

RESPONSE NO. 60:

It presently is believed to indicate Devoe & Reynolds Company.

61. This ledger describes two transactions concerning Acme, a Sherwin-Williams' affiliate. Explain the nature of those transactions.

RESPONSE NO. 61:

The transactions presently are believed to reflect the cost and weight of sales or shipments to Acme of lead carbonate purchased by the Sherwin-Williams Chicago white lead plant from persons or entities unrelated to Sherwin-Williams.

ADDITIONAL OBJECTIONS

In addition to Sherwin-Williams' objections to plaintiffs' previous interrogatories, definitions and instructions, which objections are incorporated into these responses, Sherwin-Williams makes the following additional objections, which are likewise incorporated into these responses.

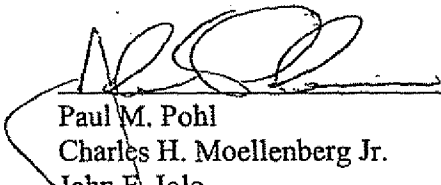
Additional Objection to Definition No. 9. Sherwin-Williams objects to the definition of "lead pigment" because it exceeds the white lead pigments known as white lead carbonate, white lead sulfate, white lead in oil, and leaded zinc oxide. Plaintiffs' claims are not based on red lead, litharge, or lead chromate and any disclosure request based on these products is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and is unduly burdensome.

Additional Objection to Instruction No. 1. Sherwin-Williams objects to plaintiffs' attempt to require Sherwin-Williams to provide guesses, or to explain further "the method employed" in making an estimate or approximation. This instruction exceeds the requirements of the CPLR and the Referee's Pretrial Order No. 40.

Additional Objection to Instruction No. 5. Sherwin-Williams objects to plaintiffs' attempt to require Sherwin-Williams to provide a detailed explanation for its responses. In general, the responses are based on the documents referenced and attached to the interrogatories

by plaintiffs. This instruction exceeds the requirements of the CPLR and the Referee's Pretrial Order No. 40.

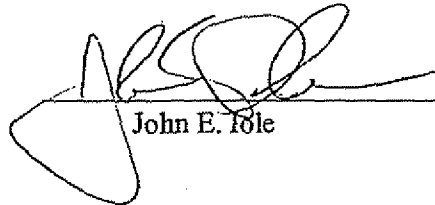
Dated: Pittsburgh, Pennsylvania
December 10, 1998



Paul M. Pohl
Charles H. Moellenberg Jr.
John E. Iole
JONES, DAY, REAVIS & POGUE
One Mellon Bank Center
500 Grant Street, 31st Floor
Pittsburgh, PA 15219

CERTIFICATE OF SERVICE

I hereby certify that, on December 10, 1998, I served true and correct copies of the within Defendant The Sherwin-Williams Company's Responses to Plaintiffs' December 1998 Interrogatories by first-class mail, postage pre-paid, on the counsel on the attached list and additionally by telecopier to counsel for plaintiffs.



John E. Fole

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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0007-SWP-0072636

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK, et al.

Plaintiffs,

- against -

LEAD INDUSTRIES ASSOCIATION, INC., et al.,

Defendants.
-----X

Index No. 14365/89

IAS Part 39

Justice Freedman

Referee Roberts

**DEFENDANT THE SHERWIN-WILLIAMS COMPANY'S SUPPLEMENTAL
RESPONSES TO INTERROGATORY NOS. 10, 13, 16, 19, 20 AND 54 OF
PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS
AND INTERROGATORY NO. 1(d) AND (e) OF PLAINTIFFS' SECOND SET OF
INTERROGATORIES TO ALL DEFENDANTS**

In accordance with Referee's Pretrial Order No. 40, The Sherwin-Williams Company ("Sherwin-Williams") provides these supplemental responses to Interrogatory Nos. 10, 13, 16, 19, 20 and 54 of Plaintiff's First Set of Interrogatories to All Defendants and Interrogatory No. 1(d) and (e) of Plaintiffs' Second Set of Interrogatories to All Defendants. These responses are subject to, limited by and without waiver of Sherwin-Williams' Objections to Disclosure, which are set forth following Sherwin-Williams' previous responses and are incorporated into these responses and its prior responses.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

Sherwin-Williams is responding based on Referee's Pretrial Order No. 40, which provided Sherwin-Williams with eight business days to identify documents responsive to the

interrogatories addressed in that order. Sherwin-Williams has undertaken a good faith and diligent effort to provide supplemental responses based on the efforts of eight attorneys and five legal assistants and project assistants who collectively spent more than 275 hours in connection with this task.

In many instances, because of the age of the documents and absence of context or witnesses, there are questions whether documents are responsive to interrogatories that pose very detailed and specific questions. In addition, because plaintiffs have not identified or defined their alleged market share theory, the interrogatories are without context and are vague and ambiguous and it is unclear what documents plaintiffs would consider to be responsive to these interrogatories. Nevertheless, Sherwin-Williams has attempted to identify documents to plaintiffs based on a reasonable and broad reading of the interrogatories and documents. By identifying documents, however, Sherwin-Williams does not concede or admit that any such document states or supports any proposition other than what is stated in the document itself. Moreover, Sherwin-Williams does not admit or concede that any identified document is necessarily authentic or admissible.

Where available, Sherwin-Williams has identified documents by Bates number. For documents on microfilm, Sherwin-Williams has indicated the microfilm roll on which the document appears, the plant or location identifier that appears on the microfilm, and specific ledger account titles. For documents that have been produced in original form, Sherwin-Williams has identified the documents by box number and specific document or folder identifier within each box.

FIRST SET OF INTERROGATORIES

Interrogatory No. 10

Did defendant ever place warnings about lead or cautions or instructions regarding any adverse health consequences from exposure to lead on containers in which the defendant's lead pigments or paints containing lead were sold or distributed? If so, state:

- a. each product that was labeled;
- b. the date, content, size and location of the label on the container;
- c. whether the labeling was pursuant to any governmental law or regulation or any industry standard or agreement (and if so, cite the authority);
- d. whether the labels appeared on products throughout the United States or whether they were limited in any way to any city, state or region.

SUPPLEMENTAL RESPONSE NO. 10:

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix A -- Interrogatory No. 10 and Appendix G -- Original Documents. Sherwin-Williams reserves the right to contest the interpretation and admissibility of the information identified in response to this interrogatory.

Interrogatory No. 13

In what years did defendant produce lead pigments? What was the tonnage per year of lead pigments produced by defendant during each year of production? What were the tonnages per year of white lead carbonate, white lead sulphate and of leaded zinc oxide produced by defendant during each year of production? Identify all documents used to answer this interrogatory.

SUPPLEMENTAL RESPONSE NO. 13:

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix B -- Interrogatory No. 13; Appendix G -- Original Documents; and Appendix H -- Microfilm Documents. Sherwin-Williams has indicated documents that appear to show production information for the listed pigments. Many of the documents, however, cannot be interpreted. For example, it is not known to what extent Sherwin-Williams' production would be over-counted due to the portrayal of production information in multiple forms. Accordingly, Sherwin-Williams reserves the right to contest the interpretation and admissibility of the information identified in response to this interrogatory.

Interrogatory No. 16

Has defendant ever compiled or attempted to compile information regarding its share or the share of any other defendant or manufacturer of the total percentage of any type of lead pigment produced, sold or used in the U.S. for any period of time. If so, state the following with respect to each such compilation or attempted compilation and identify all documents used to answer this interrogatory:

- a. the type of lead pigment;
- b. the period of time covered;
- c. the nature of the information gathered;
- d. the present location of that information; and
- e. the defendant's percentage of said lead pigments produced, sold or used in each year during that period.

SUPPLEMENTAL RESPONSE NO. 16:

By way of supplemental response, Sherwin-Williams has not located any documents that are compilations of its or any other defendant's or manufacturer's share in the production, sale or use of any white lead pigment. Sherwin-Williams has identified documents

that relate to its production of white lead pigments. See Appendix A -- Interrogatory No. 13; Appendix F -- Interrogatory No. 1, Second Set; Appendix G -- Original Documents; and Appendix H -- Microfilm Documents.

Interrogatory No. 19

Did defendant ever purchase or obtain lead pigments from any other persons? If so, identify all such persons, the years for those transactions, the volume and type of each lead pigment purchased or obtained and all documents used to answer this interrogatory.

SUPPLEMENTAL RESPONSE NO. 19:

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix C -- Interrogatory No. 19; Appendix G -- Original Documents; and Appendix H -- Microfilm Documents. In many cases, it is not possible to determine the identity of persons or entities from whom Sherwin-Williams purchased lead pigments, the volumes or years of such purchases, or the specific pigment purchased. Sherwin-Williams has attempted to identify the available information but reserves the right to contest its interpretation and admissibility. By way of further response, Sherwin-Williams directs plaintiffs to the addendum of lead pigments identified in its supplemental responses to Interrogatory Nos. 9 and 19 served on October 14, 1998, which identifies additional potential sources from which Sherwin-Williams purchased lead pigments.

Interrogatory No. 20

Did defendant ever sell or supply lead pigments to any other defendant in this case or to any other manufacturer or producer of lead pigment? If so, identify all such defendants, manufacturers or producers of lead pigment, the years for those transactions, the volume and type of each lead pigment sold or supplied and all documents used to answer this interrogatory.

SUPPLEMENTAL RESPONSE NO. 20:

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix D -- Interrogatory No. 20; Appendix G -- Original Documents; and Appendix H -- Microfilm Documents. In many cases, it is not possible to determine the identity of persons or entities to whom Sherwin-Williams sold lead pigments, whether that person or entity was itself a manufacturer of lead pigment, the volumes or years of such sales, or the specific pigment sold. Sherwin-Williams has attempted to identify the available information but reserves the right to contest its interpretation and admissibility.

Interrogatory No. 54

Did defendant ever obtain information that indicated that lead-based paint could pose a potential hazard to children? If so, state when such information was obtained, the source and substance of that information, and the effect, if any, of that information on defendant's formulas, marketing, manufacturing procedures, publicity, advertisements, and other promotional activities. Identify any documents used to respond to this interrogatory.

SUPPLEMENTAL RESPONSE NO. 54:

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix E -- Interrogatory No. 54 and Appendix G -- Original Documents. In many cases, it is not possible to determine when or how Sherwin-Williams obtained such information, who obtained the information, or the effect such information had on Sherwin-Williams. Furthermore, in many cases, the information does not address potential hazards to children. Nevertheless, Sherwin-Williams has attempted to identify the available information but reserves the right to contest its interpretation and admissibility.

SECOND SET OF INTERROGATORIES

Interrogatory No. 1

State, separately, for dry white lead carbonate, white lead-in-oil, white lead sulphate and leaded zinc oxide:

- a. The years in which defendant produced the product;
- b. The location(s) of all plants in which defendant produced each product.
- c. The years when each plant produced each product.
- d. In tons or in pounds, each plant's maximum capacity for producing each product. If a plant's maximum production capacity ever changed, state both the original plant capacity and the new plant capacity and indicate when that change went into effect.
- e. For each plant in which defendant produced each product, each year when the plant's total production of each product was below its maximum capacity, and, to the extent known, by how much.

SUPPLEMENTAL RESPONSE NO. 1(d) and (e):

By way of supplemental response, Sherwin-Williams refers plaintiffs to the attached Appendix F -- Interrogatory No. 1(d) and (e), Second Set and Appendix G -- Original Documents. Sherwin-Williams has indicated documents that appear to show capacity information for the listed pigments. Many of the documents, however, cannot be interpreted.

Accordingly, Sherwin-Williams reserves the right to contest the interpretation and admissibility of the information identified in response to this interrogatory.

Dated: November 30, 1998
Pittsburgh, Pennsylvania

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APPENDIX A

Interrogatory No. 10 -- Warnings and Instructions		
All documents are for prefix 0007-SWP- except as indicated		
Interrogatory No. 10 (general)	Interrogatory No. 10(c)	Interrogatory No. 10(d)
275	5915-5942	24230; 24231
321	13541; 13544	24284; 24285
331	13530; 13531-532	29351; 29354
332	24230; 24231	48300; 48304-317
5912	24284; 242	35-SWP-13530; 13531-532
5943-9482	29351; 29354	35-SWP-13541; 13544
5961	36192	
5985	36300	
24230;24233	36311	
29351;29354	36313	
30182;30183	36347	
31073-74	36367	
31075	36463	
31076	36484	
36170	36524	
36176	36543	
36177	36544	
36179	36599	
36180	37059	
36183	46984	
36186	48250-279	
36190	48280-284	
36192	48285-286	
59853361936193	48300; 48304-317	

APPENDIX A

Interrogatory No. 10 -- Warnings and Instructions		
All documents are for prefix 0007-SWP- except as indicated		
Interrogatory No. 10 (general)	Interrogatory No. 10(c)	Interrogatory No. 10(d)
24230; 242336194619433	48318-323	
30182; 301833630363000	48324	
36462	48325	
36501	48326	
36524	48327-328	
36599	48353; 48360-364	
36603	35-SWP-13541; 13544	
47030	35-SWP-13530; 13531-532	
47068-072		
47073		
47074-075		
47076-079		
47080-081		
47082-083		
47084		
47085		
47086-087		
47088-089		
47093		
47094		
47096-098		
47101		
47103		

APPENDIX A

Interrogatory No. 10 – Warnings and Instructions		
All documents are for prefix 0007-SWP- except as indicated		
Interrogatory No. 10 (general)	Interrogatory No. 10(c)	Interrogatory No. 10(d)
47106		
47108		
47115		
47896;47897		
47898; 47899		
47900; 47901		
47902; 47903		
48222; 48230		
48237; 48238		
48239; 48243, 48245, 48247, 48249		
48250		
48287; 48288		
48289; 48293, 48295, 48297, 48299		
48332; 48333-341, 48343- 348, 48350-352		
48373; 48374		
48390		

APPENDIX B-1

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
13828		7358; 7360
22359; 22361		22012; 22013
22445; 22446		22353; 22353
29326; 29328		22359; 22361
29334; 29337		22401; 22402
29343; 29345		22445; 22446
29361; 29363		22451; 22452
29371; 29373		22455; 22457
29385; 29387		22461; 22462
32395; 32720		22467; 22468
33841; 33929		22480; 22482
		22493; 22494
		22500; 22501
		22515; 22516
		22521; 22523
		22530; 22532
		22537; 22540
		22545; 22548
		22562; 22564, 22565
		22607; 22610
		22616; 22619
		22626; 22630, 22631
		22639; 22643, 22644
		22651; 22654

APPENDIX B-1

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		22663; 22666
		22673; 22677
		22684; 22684
		22686; 22689
		22698; 22701
		22717; 22720
		22737; 22740
		22749; 22752
		22760; 22761
		22762; 22763
		22764; 22765
		22768; 22769
		22776; 22779
		22780; 22785
		22794; 22797
		22812; 22813
		22814; 22816
		22826; 22829
		22838; 22838
		22841; 22843
		22860; 22860
		22863; 22866
		22875; 22875

APPENDIX B-1

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		22878; 22881
		22891; 22891
		22894; 22898
		22907; 22907
		22910; 22910
		22913; 22915
		22940; 22940
		22943; 22946
		22957; 22957
		22960; 22962
		22974; 22974
		22977; 22980
		22989; 22989
		22992; 22995
		23003; 23003
		23006; 23006
		23009; 23011
		23029; 23030
		23032; 23032
		23035; 23035
		23037; 23037
		23068; 23068
		23071; 23071

APPENDIX B-1

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23074; 23074
		23077; 23077
		23080; 23080
		23082; 23082
		23085; 23085
		23088; 23088
		23095; 23097
		23109; 23109
		23112; 23112
		23115; 23115
		23118; 23118
		23121; 23121
		23125; 23129
		23144; 23144
		23147; 23150
		23159; 23159
		23162; 23162
		23165; 23168
		23180; 23180
		23183; 23183
		23186; 23188
		23200; 23200
		23203; 23204

APPENDIX B-1

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23206; 23209
		23219; 23222
		23232; 23233
		23235; 23238
		23257; 23257
		23260; 23261
		23263; 23263
		23266; 23266
		23269; 23272
		23286; 23286
		23289; 23289
		23292; 23295
		23307; 23307
		23310; 23310
		23313; 23316
		23329; 23329
		23332; 23332
		23335; 23337
		23349; 23349
		23352; 23352
		23355; 23358
		23370; 23370
		23373; 23373

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23376; 23379
		23387; 23387
		23390; 23390
		23393; 23396
		23407; 23407
		23410; 23410
		23413; 23416
		23428; 23428
		23431; 23431
		23434; 23436
		23446; 23446
		23449; 23449
		23452; 23454
		23468; 23468
		23471; 23471
		23474; 23476
		23489; 23493
		23504; 23504
		23507; 23507
		23523; 23523
		23526; 23526
		23529; 23531
		23540; 23540

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23542; 23542
		23545; 23549
		23561; 23561
		23564; 23564
		23568; 23568
		23572; 23572
		23576; 23576
		23580; 23580
		23584; 23584
		23588; 23588
		23592; 23592
		23596; 23596
		23600; 23600
		23604; 23604
		23608; 23608
		23612; 23612
		23616; 23616
		23620; 23620
		23624; 23624
		23628; 23628
		23632; 23632
		23636; 23636
		23640; 23643

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23655; 23655
		23659; 23659
		23663; 23663
		23667; 23667
		23671; 23671
		23675; 23675
		23679; 23679
		23683; 23683
		23687; 23687
		23691; 23691
		23695; 23695
		23699; 23699
		23703; 23707
		23724; 23724
		23728; 23728
		23745; 23745
		23749; 23749
		23753; 23753
		23757; 23757
		23761; 23761
		23765; 23765
		23769; 23769
		23773; 23773

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23777; 23777
		23781; 23782
		23787; 23787
		23792; 23793
		23797; 23797
		23803; 23804
		23807; 23808
		23812; 23813
		23817; 23818
		23823; 23825
		23827; 23828
		23831; 23832
		23835; 23836
		23839; 23840
		23843; 23844
		23846; 23847
		23849; 23850
		23852; 23853
		23856; 23857
		23861; 23862
		23866; 23875
		23888; 23889
		23894; 23895

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		23909; 23910
		23921; 23922
		23932; 23933
		23942; 23944
		23954; 23955
		23965; 23967
		23977; 23979
		23990; 23991
		24002; 24003
		24014; 24015
		24028; 24029
		24042; 24044
		24053; 24054
		24064; 24066
		24073; 24074
		24082; 24083
		24092; 24093
		24101; 24103
		24114; 24116
		24130; 24132
		24140; 24141
		24153; 24155
		24164; 24165

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		24175; 24176
		24186; 24189
		24197; 24199
		24209; 24211
		24219; 24221
		24230; 24232
		24241; 24243
		24252; 24254
		24262; 24264
		24272; 24274
		24284; 24287
		24297; 24300
		24301; 24301
		24307; 24310
		24318; 24320
		24327; 24329
		24338; 24341
		24348; 24350
		24358; 24363
		24370; 24373
		24384; 24387
		24396; 24399
		24409; 24412

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		24421; 24424
		24434; 24437
		24448; 24451
		24459; 24462
		24470; 24474
		24484; 24487
		24497; 24500
		24509; 24512
		24524; 24527
		24534; 24537
		24549; 24551
		24559; 24562
		24571; 24574
		24582; 24585
		24592; 24594
		24602; 24605
		24614; 24616
		24627; 24630
		24638; 24642
		24650; 24654
		24662; 24666
		24676; 24679
		24688; 24691

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		24701; 24704
		24712; 24715
		24723; 24726
		24735; 24737
		24747; 24751
		24757; 24759
		24773; 24777
		24785; 24787
		24796; 24799
		24808; 24811
		24820; 24823
		24835; 24837
		24847; 24850
		24858; 24861
		24870; 24874
		24884; 24887
		24895; 24898
		24907; 24910
		24919; 24922
		24933; 24936
		24945; 24949
		24962; 24964
		24976; 24979

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		24987; 24990
		24998; 25001
		25007; 25011
		25019; 25022
		25033; 25036
		25047; 25050
		25060; 25063
		25071; 25074
		25083; 25085
		25096; 25100
		25109; 25112
		25120; 25123
		25133; 25136
		25144; 25147
		25156; 25159
		25167; 25170
		25179; 25182
		25192; 25195
		25206; 25209
		25218; 25222
		25234; 25237
		25249; 25253
		25267; 25270

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		25277; 25280
		25289; 25292
		25304; 25308
		25319; 25322
		25332; 25335
		25345; 25348
		25360; 25363
		25375; 25377
		25387; 25389
		25399; 25402
		25411; 25414
		25423; 25427
		25435; 25439
		25456; 25459
		25463; 25466
		25477; 25481
		25489; 25493
		25501; 25504
		25511; 25514
		25526; 25530
		25539; 25542
		25553; 25556
		25565; 25569

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		25577; 25580
		25591; 25595
		25603; 25606
		25615; 25618
		25627; 25628
		25632; 25633
		25642; 25645
		25652; 25654
		25662; 25665
		25672; 25675
		25682; 25685
		25694; 25697
		25701; 25703
		25713; 25716
		25724; 25726
		25737; 25740
		25748; 25751
		25760; 25763
		25772; 25775
		25783; 25786
		25797; 25799
		25809; 25812
		25824; 25826

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		25835; 25838
		25847; 25849
		25861; 25864
		25875; 25877
		25888; 25891
		25903; 25906
		25916; 25919
		25929; 25933
		25942; 25945
		25958; 25960
		25970; 25973
		25984; 25987
		26002; 26005
		26013; 26015
		26026; 26029
		26039; 26042
		26051; 25054
		26064; 26067
		26078; 26081
		26091; 26094
		26103; 26107
		26115; 26119
		26127; 26130

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		26140; 26143
		26152; 26155
		26164; 26167
		26176; 26178
		26189; 26192
		26201; 26203
		26211; 26213
		26222; 26224
		26233; 26236
		26245; 26247
		26257; 26259
		26269; 26272
		26280; 26283
		26295; 26299
		26311; 26313
		26325; 26328
		26335; 26337
		26347; 26349
		26357; 26360
		26370; 26373
		26384; 26388
		26397; 26400
		26410; 26414

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		26420; 26423
		26435; 26349
		26458; 26461
		26466; 26470
		26480; 26484
		26495; 26498
		26507; 26511
		26517; 26521
		26536; 26539
		26543; 26552
		26558; 26567
		26579; 26584
		26599; 26603
		26606; 26610
		26621; 26625
		26637; 26641
		26652; 26658
		26670; 26674
		26684; 26689
		26701; 26710
		26716; 26726
		26731; 26735
		26742; 26747

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		26759; 26768
		26774; 26779
		26791; 26797
		26809; 26816
		26827; 26832
		26845; 26849
		26860; 26869
		26874; 26881
		26888; 26895
		26905; 26913
		26918; 26927
		26933; 26941
		26946; 26948
		26957; 26960
		26975; 26977
		26991; 26992
		27006; 27007
		27021; 27022
		27035; 27037
		27047; 27049
		27063; 27065
		27078; 27080
		27093; 27095

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		27107; 27110
		27122; 27124
		27138; 27140
		27155; 27157
		27168; 27170
		27182; 27183
		27197; 27199
		27211; 27213
		27227; 27229
		27242; 27244
		27257; 27260
		27273; 27275
		27286; 27288
		27301; 27303
		27317; 27320
		27333; 27335
		27348; 27350
		27362; 27365
		27379; 27382
		27394; 27397
		27407; 27410
		27421; 27423
		27435; 27438

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		27446; 27449
		27463; 27466
		27477; 27480
		27494; 27497
		27511; 27514
		27526; 27529
		27544; 27547
		27561; 27564
		27577; 27579
		27591; 27593
		27605; 27608
		27620; 27622
		27635; 27637
		27644; 27646
		27660; 27663
		27676; 27679
		27684; 27688
		27701; 27704
		27716; 27719
		27726; 27728, 27738
		27751; 27753
		27763; 27765
		27774; 27777

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		27785; 27788
		27801; 27804
		27810; 27813
		27825; 27828
		27840; 27842
		27857; 27859
		27874; 27876
		27889; 27891
		27904; 27906
		27917; 27919
		27926; 27927
		27936; 27940
		27958; 27961
		27972; 27975
		27992; 27995
		28003; 28006
		28020; 28022
		28030; 28032
		28045; 28048
		28058; 28061, 28062
		28078; 28081
		28090; 28093
		28106; 28109

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		28117; 28120
		28133; 28136
		28145; 28148
		28165; 28167
		28176; 28178
		28195; 28197
		28206; 28208
		28225; 28227
		28236; 28238
		28253; 28256
		28265; 26268
		28284; 28287
		28296; 28299
		28312; 28315
		28321; 28324
		28337; 28339
		28346; 28348
		28361; 28364
		28371; 28374
		28390; 28392
		28403; 28405
		28419; 28421
		28434; 28437

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		28450; 28453
		28468; 28471
		28484; 28486
		28498; 28502
		28516; 28519
		28525; 28528
		28542; 28545
		28561; 28564
		28577; 28581
		28597; 28600
		28616; 28619
		28633; 28637
		28653; 28656
		28670; 28674
		28689; 28693
		28707; 28710
		28729; 28732
		28748; 28751
		28766; 28770
		28785; 28789
		28802; 28804
		28815; 28818
		28831; 28833

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		28850; 28854
		28867; 28871
		28882; 28885
		28899; 28902
		28915; 28918
		28936; 28938
		28950; 28954
		28969; 28972
		28989; 28992
		29006; 29008
		29027; 29030
		29046; 29050
		29065; 29069
		29084; 29087
		29102; 29106
		29117; 29120
		29133; 29136
		29151; 29155
		29173; 29178
		29193; 29196
		29210; 29213
		29222; 29222
		29230A; 29230D

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		29231; 29231
		29235; 29236
		29240; 29243
		29255; 29258
		29271; 29275
		29284; 29287
		29299; 29302
		29312; 29315
		29326; 29328
		29334; 29337
		29343; 29345
		29351; 29353
		29361; 299363
		29379; 29380
		29385; 29387
		29396; 29397
		29398; 29399
		29400; 29401
		29402; 29403
		29404; 29405
		29406; 29407
		29408; 29409
		29410; 29411

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		29420; 29420
		29423; 29426
		29436; 29438
		29453; 29456
		29468; 29469
		29471; 29473
		29487; 29488
		29491; 29493
		29503; 29504
		29507; 29510
		29526; 29527
		29530; 29531
		29534; 29537
		29547; 29548
		29566; 29567
		29570; 29573
		29582; 29583
		29586; 29589
		29606; 29607
		29610; 29613
		29621; 29622
		29624; 29627
		29635; 29638

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		29650; 29651
		29653; 29657
		29667; 29668
		29670; 29673
		29681; 29682
		29684; 29686
		29695; 29697
		29713; 29716
		29725; 29727
		29746; 29750
		29758; 29760
		29770; 29770
		29795; 29796
		29798; 29799
		29801; 29802
		29819; 29822A
		29833; 29837
		29849; 29853
		29866; 29869
		29881; 29885
		29898; 29900
		29916; 29920
		29940; 29940

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0007-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		29979; 29979
		30155; 30155
		30169; 30169
		30182; 30184
		30193; 30197
		30205; 30213
		30220; 30227
		30232; 30235
		30247; 30256

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
10557; 10559		10652; 10654
10652; 10654		10660; 10663
10692; 10696		10671; 10673
10703; 10705		10679; 10681
10710; 10712		10692; 10695
10718; 10721		10703; 10705
10733; 10735		10710; 10712
10741; 10743		10718; 10721
10749; 10751		10725; 10727
10757; 10759		10733; 10735
10764; 10767		10741; 10742
10773; 10776		10741; 10743
10782; 10783		10749; 10751
10790; 10793		10757; 10759
10798; 10801		10764; 10765
10807; 10808		10764; 10767
10814; 10816		10773; 10776
10820; 10822		10782; 10783
10826; 10827		10790; 10793
10832; 10833		10798; 10801
10839; 10840		10807; 10808
10845; 10846		10814; 10816
10852; 10853		10820; 10822
10858; 10859		10826; 10827

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
10866; 10867		10832; 10833
10873; 10875		10839; 10840
10881; 10882		10845; 10846
10887; 10888		10852; 10853
10893; 10895		10858; 10859
10900; 10902		10866; 10867
10907; 10909		10881; 10882
10914; 10916		10887; 10888
10921; 10923		10893; 10895
10928; 10930		10900; 10902
10937; 10940		10907; 10909
10945; 10948		10914; 10916
10953; 10955		10921; 10923
10960; 10962		10928; 10930
10967; 10969		10937; 10940
10981; 10983		10945; 10948
10988; 10989		10953; 10955
10996; 10997		10960; 10962
11002; 11003		10967; 10969
11009; 11010		10981; 10983
11014; 11015		10988; 10989
11020; 11022		10996; 10997
11025; 11026		11002; 11003
11031; 11032		11009; 11010

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11036; 11037		11014; 11015
11043; 11044		11020; 11022
11050; 11051		11025; 11026
11056; 11058		11031; 11032
11063; 11064		11036; 11037
11070; 11071		11043; 11044
11077; 11078		11050; 11051
11083; 11084		11056; 11058
11089; 11090		11063; 11064
11096; 11097		11070; 11071
11102; 11103		11077; 11078
11108; 11110		11083; 11084
11113; 11114		11089; 11090
11119; 11120		11096; 11097
11126; 11127		11102; 11103
11132; 11133		11108; 11110
11138; 11141		11113; 11114
11145; 11146		11119; 11120
11152; 11153		11126; 11127
11158; 11159		11132; 11133
11164; 11165		11138; 11141
11170; 11170		11145; 11146
11176; 11177		11152; 11153
11182; 11184		11158; 11159

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11189; 11191		11164; 11165
11196; 11198		11170; 11170
11201; 11203		11176; 11177
11208; 11211		11182; 11184
11215; 11216		11189; 11191
11220; 11222		11196; 11198
11227; 11228		11201; 11203
11233; 11236		11208; 11211
11240; 11242		11215; 11216
11247; 11248		11220; 11222
11254; 11255		11227; 11228
11260; 11262		11233; 11236
11267; 11269		11240; 11242
11274; 11276		11247; 11248
11281; 11283		11254; 11255
11289; 11291		11260; 11262
11296; 11298		11267; 11269
11301; 11302		11274; 11276
11308; 11310		11281; 11283
11316; 11318		11289; 11291
11323; 11325		11296; 11298
11330; 11331		11301; 11302
11337; 11340		11308; 11310
11346; 11347		11316; 11318

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Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11354; 11355		11323; 11325
11361; 11362		11330; 11331
11368; 11370		11337; 11340
11375; 11377		11346; 11347
11382; 11383		11354; 11355
11388; 11389		11361; 11362
11394; 11396		11368; 11370
11401; 11402		11375; 11377
11408; 11409		11382; 11383
11415; 11417		11388; 11389
11423; 11425		11394; 11396
11430; 11432		11401; 11402
11437; 11438		11408; 11409
11443; 11445		11415; 11417
11450; 11452		11423; 11425
11458; 11460		11430; 11432
11467; 11468		11437; 11438
11474; 11475		11443; 11445
11489; 11491		11450; 11452
11497; 11499		11458; 11460
11503A; 11503C		11467; 11468
11504; 11507		11474; 11475
11512; 11514		11489; 11491
11520; 11523		11497; 11499

APPENDIX B-2

Interrogatory No. 13 – Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11529; 11531		11503A; 11503C
11538; 11540		11504; 11507
11545; 11546		11512; 11514
11553; 11555		11520; 11523
11561; 11564		11529; 11531
11571; 11573		11538; 11540
11578; 11579		11553; 11555
11586; 11589		11561; 11564
11595; 11596		11571; 11573
11606; 11607		11578; 11579
11614; 11616		11586; 11589
11623; 11624		11595; 11596
11632; 11634		11606; 11607
11640; 11642		11614; 11616
11648; 11651		11623; 11624
11656; 11658		11632; 11634
11663; 11665		11640; 11642
11670; 11672		11648; 11651
11679; 11681		11656; 11658
11687; 11690		11663; 11665
11697; 11699		11670; 11672
11706; 11708		11679; 11681
11714; 11716		11687; 11690
11721; 11723		11697; 11698

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11730; 11732		11697; 11699
11730; 11733		11706; 11708
11740; 11742		11714; 11716
11748; 11751		11721; 11723
11757; 11758		11730; 11732
11765; 11767		11730; 11733
11773; 11775		11740; 11742
11782; 11784		11748; 11751
11791; 11793		11757; 11758
11800; 11802		11765; 11767
11809; 11811		11773; 11775
11817; 11819		11782; 11784
11825; 11827		11791; 11793
11833; 11835		11809; 11811
11840; 11842		11817; 11819
11848; 11850		11825; 11827
11857; 11859		11833; 11835
11866; 11868		11840; 11842
11884; 11885		11848; 11850
11891; 11893		11857; 11859
11908; 11909		11866; 11868
11917; 11919		11884; 11885
11925; 11927		11891; 11893
11934; 11935		11908; 11909

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
11944; 11946		11917; 11919
11954; 11956		11925; 11927
11964; 11966		11934; 11935
11973; 11975		11944; 11946
11982; 11983		11954; 11956
11991; 11994		11964; 11966
12000; 12002		11973; 11975
12009; 12011		11982; 11983
12019; 12021		11991; 11994
12028; 12030		12000; 12002
12039; 12041		12009; 12011
12050; 12052		12019; 12021
12058; 12060		12028; 12030
12073; 12074		12039; 12041
12081; 12083		12050; 12052
12090; 12092		12058; 12060
12098; 12100		12073; 12074
12106; 12108		12081; 12083
12115; 12117		12090; 12092
12124A; 12124C		12098; 12100
12125; 12127		12106; 12108
12135; 12137		12115; 12117
12146; 12149		12124A; 12124C
12157; 12161		12125; 12127

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
12170; 12173		12135; 12137
12182; 12186		12146; 12149
12197; 12200		12157; 12161
12209; 12213		12170; 12173
12221; 12224		12182; 12186
12230; 12234		12197; 12200
12244; 12249		12209; 12213
12255; 12259		12221; 12224
12268; 12273		12230; 12234
12279; 12284		12240; 12249
12293; 12296		12255; 12259
12300; 12304		12268; 12273
12313; 12318		12279; 12284
12325; 12329		12293; 12296
12342; 12346		12300; 12304
12356; 12359		12313; 12318
12368; 12371		12325; 12329
12385; 12388		12342; 12346
12397; 12400		12356; 12359
12410; 12413		12368; 12371
12421; 12425		12385; 12388
12432; 12435		12397; 12400
12443; 12445		12410; 12413
12462; 12465		12421; 12425

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
12474; 12477		12432; 12435
12486; 12490		12443; 12445
12498; 12501		12462; 12465
12516; 12519		12486; 12490
12528; 12532		12498; 12501
12540; 12543		12516; 12519
12552; 12555		12528; 12532
12570; 12574		12540; 12543
12583; 12586		12552; 12555
12596; 12599		12570; 12574
12707; 12610		12583; 12586
12629; 12632		12596; 12599
12641; 12644		12607; 12610
12654; 12658		12629; 12632
12667; 12671		12641; 12644
12683; 12686		12654; 12658
12705; 12708		12667; 12671
12717; 12719		12683; 12686
12727; 12730		12705; 12708
12740; 12743		12717; 12719
12763; 12766		12727; 12730
12774; 12777		12740; 12743
12787; 12790		12763; 12766
12799; 12802		12774; 12777

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
12821; 12824		12787; 12790
12833; 12836		12799; 12802
12845; 12848		12821; 12824
12856; 12859		12833; 12836
12870; 12872		12856; 12859
12881; 12883		12870; 12872
12893; 12895		12881; 12883
12904; 12907		12893; 12895
12916; 12919		12904; 12907
12937; 12940		12916; 12919
12950; 12952		12937; 12940
12963; 12970		12950; 12952
12980; 12984		12963; 12970
13006; 13008		12980; 12984
13019; 13022		13006; 13008
13033; 13037		13019; 13022
13047; 13050		13033; 13037
13060; 13064		13047; 13050
13075; 13078		13060; 13064
13098; 13101		13075; 13078
13111; 13114		13098; 13101
13124; 13128		13111; 13114
13136; 13139		13124; 13128
13149; 13152		13136; 13139

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
13161; 13164		13149; 13152
13183; 13186		13161; 13164
13195; 13197		13183; 13186
13208; 13210		13195; 13197
13219; 13222		13208; 13210
		13219; 13222
		13240; 13243
		13249; 13252
		13266; 13269
		13278; 13281
		13300; 13303
		13312; 13314
		13324; 13327
		13337; 13341
		13353; 13357
		13369; 13375
		13386; 13389
		13400; 13405
		13416; 13418
		13429; 13430
		13437; 13439
		13446; 13447
		13454; 13456
		13464; 13467

APPENDIX B-2

Interrogatory No. 13 -- Years and Tons of Production		
All documents are for prefix 0035-SWP-		
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide
		13473; 13476
		13483; 13484
		13494; 13495
		13503; 13504
		13512; 13513
		13521; 13523
		13530; 13532
		13541; 13543

APPENDIX C

Interrogatory No. 19 -- Purchases
All documents below are for prefix 0007-SWP-
21841; 21843, 21844
21857; 21858
22180; 22181, 22182
22190; 22191
22210; 22211
22414; 22415
22686; 22686
23434; 23435
25249; 25251
All documents below are for prefix 0035-SWP-
10660; 10662
10757; 10758
12157; 12160
13278; 13281

APPENDIX D

Interrogatory No. 20 -- Sales
All documents below are for prefix 0007-SWP-
2305
21927; 21929
22210; 22211
22414; 22416
25249; 25251
46265
All documents below are for prefix 0035-SWP-
10660; 10662
10692; 10695
12157; 12160
13266; 13268

APPENDIX E

Interrogatory No. 54 -- Health Hazards		
269-274		35-SWP-10550; 551
1340; 1368, 1378		
4484; 4489-4490		
5689; 5693		
5695; 5697, 5698		
5701; 5702-04, 5707, 5710		
5716; 5717-18		
5719; 5719-21		
5722; 5723		
5732; 5733		
5810; 5812		
5820		
5821		
5822		
5823		
5824		
5826		
5828-5830		
5831-5832		
5833; 5834-35, 5839-40		
5841-5845		
5846		
5850-5865		
5866		
5876; 5877-78		
5881		

APPENDIX E

Interrogatory No. 54 -- Health Hazards		
24230; 24231		
30182; 30183		
30429; 30455		
30961-962		
36311		
36503		
36695		
36830; 36833-36909		
37039		
37084		
37088; 37096		
37097		
37104		
37118		
37121		
37140		
48380; 48382		

APPENDIX F-1

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0007-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
7012; 7013	22414; 22415		6967
7110			7110
21912; 21912			21821; 21821
21919; 21919			21827; 21827
21927; 21927			21833; 21833
21936; 21936			21841; 21841
21942; 21942			21850; 21850
21949; 21949			21857; 21857
21966; 21966			21866; 21866
21972; 21972, 21973			21874; 21874
21979; 21979			21882; 21882
21989; 21989			21889; 21889
21998; 21998			21896; 21896
22005; 22005			21904; 21904
22012; 22012			21912; 21912
22019; 22019			21919; 21919
22027; 22027			21927; 21927
22034; 22034			21936; 21936, 21938
22042; 22042			21942; 21942
22050; 22050			21949; 21949
22135; 22137			21955; 21955
22172; 22174			21966; 21966
22180; 22180			21972; 21972
22190; 22190			21979; 21979

APPENDIX F-1

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0007-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
22197; 22197			21989; 21989
22203; 22203			21998; 21988
22210; 22210			22005; 22005
22218; 22218			22012; 22012
22226; 22226, 22228			22019; 22019
22233; 22233			22027; 22027
22241; 22241			22034; 22034
22247; 22247			22042; 22042
22254; 22254			22180; 22180
22259; 22259			22190; 22190
22267; 22267			22197; 22197
22284; 22284			22203; 22203
22292; 22292			22218; 22218
22299; 22299			22226; 22226
22308; 22308			22233; 22233
22316; 22316			22241; 22241
22324; 22324			22247; 22247
22333; 22333			22254; 22254
22342; 22342			22259; 22259
22351; 22351			22267; 22267
22359; 22359			22275; 22275
22367; 22367			22284; 22284
22374; 22374			22292; 22292

APPENDIX F-1

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0007-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
22381; 22381			22299; 22299
22388; 22388			22308; 22308
22394; 22394			22316; 22316
22401; 22401			22324; 22324
22408; 22409			22333; 22333
22414; 22414			22342; 22342
22422; 22423			22351; 22351
22431; 22431			22359; 22359
			22367; 22367
			22210; 22210
			22374; 22374
			22381; 22381
			22388; 22388
			22394; 22394
			22401; 22401
			22408; 22409
			22414; 22414
			22422; 22423
			22431; 22431

APPENDIX F-2

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
10557; 10557	10921; 10923		10527; 10527
10564; 10564	11260; 11263		10557; 10557
10573; 10573			10564; 10564
10581; 10581			10573; 10573
10590; 10590			10581; 10581
10599; 10599, 10601			10590; 10590
10607; 10610			10599; 10599, 10601
10625; 10628			10607; 10607, 10610
10635; 10635, 10636			10617; 10617
10644; 10644			10625; 10625, 10628
10652; 10652			10635; 10635
10660; 10660			10635; 10636
10671; 10671			10644; 10644
10679; 10679			10652; 10652
10692; 10692			10660; 10660
10703; 10703			10671; 10671, 10672
10710; 10710			10679; 10679
10718; 10718			10692; 10692
10725; 10725			10703; 10703
10733; 10733			10710; 10710
10741; 10741			10718; 10718
10749; 10749			10725; 10725
10757; 10757			10733; 10733
10764; 10764			10741; 10741

APPENDIX F-2

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
10773; 10773			10749; 10749
10782; 10782			10757; 10757
10790; 10790			10764; 10764
10798; 10798			10773; 10773
10807; 10808			10782; 10782
10814; 10814, 10817			10790; 10790
10820; 10820			10798; 10798
10826; 10829			10807; 10808
10832; 10835			10814; 10817
10839; 10842			10820; 10820
10845; 10849			10826; 10829
10852; 10855			10832; 10835
10858; 10863			10839; 01842
10866; 10870			10845; 10849
10873; 10878			10852; 10855
10881; 10884			10858; 10863
10887; 10890			10866; 10870
10893; 10897			10873; 10878
10900; 10904			10881; 10884
10907; 10911			10887; 10890
10914; 10918			10893; 10897
10921; 10925			10900; 10904
10928; 10933			10907; 10911

APPENDIX F-2

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
10937; 10942			10914; 10918
10945; 10950			10921; 10925
10953; 10957			10928; 10933
10960; 10964			10937; 10942
10967; 10971			10945; 10950
10974; 10978			10953; 10957
10981; 10985			10960; 10964
10988; 10992			10967; 10971
10996; 10999			10981; 10985
11002; 11006			10988; 10992
11009; 11012			10996; 10999
11308; 11312			11002; 11006
11316; 11320			11009; 11012
11323; 11327			
11330; 11334			
11337; 11343			
11346; 11351			
11354; 11358			
11368; 11373			
11375; 11379			
11382; 11386			
11388; 11391			
11394; 11398			

APPENDIX F-2

Interrogatory No. 1(d), Second Set -- Plant Production Capacity and Changes			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
11401; 11405			
11408; 11412			
11415; 11419			
11423; 11427			
11430; 11434			
11437; 11440			
11443; 11447			
11450; 11455			
11458; 11464			
11467; 11468, 11471			
11474; 11478			
11481; 11485			
11489; 11493			
11757; 11758			
11773; 11776			

APPENDIX F-3

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0007-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
21821; 21821			22050; 22050
21827; 21827			22057; 22057
21833; 21833			22063; 22063
21841; 21841			22068; 22068
21850; 21850			22076; 22076
21857; 21857			22082; 22082
21866; 21866			22089; 22089
21874; 21874			22095; 22095
21882; 21882			22102; 22102
21889; 21889			22110; 22110
21896; 21896			22118; 22118
21904; 21904			22126; 22126
21955; 21955			22135; 22135
22057; 22057			22150; 22150
22063; 22063			22158; 22158
22068; 22068			22165; 22165
22076; 22076			22172; 22173
22082; 22082			22439; 22442
22089; 22089			22445; 22448
22095; 22095			22451; 22453
22102; 22102			22455; 22459
22110; 22110			22461; 22464
22118; 22118			22467; 22471
22126; 22126			22474; 22477

APPENDIX F-3

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0007-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
22135; 22135			22480; 22484
22142; 22142			22486; 22490
22150; 22150			22493; 22497
22158; 22158			22500; 22504
22165; 22165			22507; 22508
22172; 22172			22507; 22511
22439; 22442			22515; 22518
22445; 22448			22537; 22540
22451; 22453			22545; 22548
22455; 22459			22913; 22915
22461; 22464			23095; 23097
22467; 22471			29379; 29382
22474; 22477			
22480; 22484			
22486; 22490			
22493; 22497			
22500; 22504			
22507; 22511			
22515; 22518			
29379; 29382			

APPENDIX F-4

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
10527; 10527			10535; 10535
10535; 10535			10543; 10543
10543; 10543			10550; 10550
10550; 10550			11020; 11023
10607; 10607			11025; 11062
10617; 10617			11031; 11033
10625; 10625			11036; 11040
11020; 11023			11043; 11047
11025; 11026			11050; 11054
11031; 11033			11056; 11061
11036; 11040			11063; 11067
11043; 11047			11070; 11074
11050; 11054			11077; 11080
11056; 11061			11083; 11086
11063; 11067			11089; 11093
11070; 11074			11096; 11099
11077; 11080			11102; 11106
11083; 11086			11108; 11111
11089; 11093			11113; 11114
11096; 11099			11113; 11116
11102; 11106			11119; 11123
11108; 11111			11126; 11129
11113; 11114			11132; 11135
11113; 11116			11138; 11142

APPENDIX F-4

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
11119; 11123			11145; 11149
11126; 11129			11152; 11155
11132; 11135			11158; 11161
11138; 11142			11164; 11167
11145; 11149			11170; 11173
11152; 11155			11176; 11180
11158; 11161			11182; 11186
11164; 11167			11189; 11193
11170; 11173			11196; 11199
11176; 11180			11201; 11205
11182; 11186			11208; 11211
11189; 11193			11215; 11218
11196; 11199			11220; 11224
11201; 11205			11227; 11228
11208; 11211			11233; 11237
11215; 11218			11240; 11244
11220; 11224			11247; 11251
11227; 11228			11254; 11258
11233; 11237			11260; 11264
11240; 11244			11267; 11271
11247; 11251			11274; 11278
11254; 11258			11281; 11285
11260; 11264			11289; 11293

APPENDIX F-4

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
11267; 11271			11296; 11299
11274; 11278			11301; 11305
11281; 11285			11308; 11312
11289; 11293			11316; 11320
11296; 11299			11323; 11327
11301; 11305			11330; 11334
11361; 11364			11337; 11343
			11346; 11351
			11354; 11358
			11361; 11364
			11368; 11373
			11375; 11379
			11382; 11386
			11388; 11391
			11394; 11398
			11401; 11405
			11408; 11412
			11415; 11419
			11423; 11427
			11430; 11434
			11437; 11440
			11443; 11447
			11450; 11455

APPENDIX F-4

Interrogatory No. 1(e), Second Set -- Plant Production Less Than Capacity			
All documents are for prefix 0035-SWP-			
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide
			11458; 11464
			11467; 11468
			11467; 11471
			11474; 11478
			11481; 11485
			11489; 11493

APPENDIX G -- ORIGINAL DOCUMENTS*

Interrogatory No. 10			
CN 1, Folder 1			
CN 1, Folder 2			
CN 1, Folder 3			
Interrogatory No. 13			
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide	General
CN 2, Folder 5		CN 2, Folder 5	CN 2, Folder 5
CN 5, <u>Chameleon</u> , Vol. 28, No. 5 (1927)		CN 5, <u>Chameleon</u> , Vol. 20, No. 6 (1919)	CN 4, <u>Chameleon</u> , Vol. 13, No. 2 (1910)
CN 22, Folder 2		CN 5, <u>Chameleon</u> , Vol. 21, No. 1 (1920)	CN 4, <u>Chameleon</u> , Vol. 13, No. 3 (1910)
CN 43, Folder 2		CN 6, <u>The SWP</u> , Vol. 8, No. 7 (1906)	CN 4, <u>Chameleon</u> , Vol. 13, No. 4 (1910)
		CN 10, Folder 1, <u>The SWP</u> , No. 19 (1923)	CN 4, <u>Chameleon</u> , Vol. 13, No. 5 (1910)
		CN 21, Folder 3	CN 4, <u>Chameleon</u> , Vol. 13, No. 8 (1910)
		CN 28, Folder 2	CN 4, <u>Chameleon</u> , Vol. 18, No. 2 (1915)
		CN 41, Folder 4, <u>Sherwin-Williams World</u> , Vol. 6, No. 3, (1948)	CN 4, <u>Chameleon</u> , Vol. 18, No. 4 (1915)
		CN 43, Folder 2	CN 4, <u>Chameleon</u> , Vol. 18, No. 5 (1915)
			CN 4, <u>Chameleon</u> : "What Fifty Years Have Wrought" (1916)

*References are to consecutive numbers ("CN") of boxes on index of original documents, and to specific documents or folders within such boxes.

APPENDIX G -- ORIGINAL DOCUMENTS*

Interrogatory No. 13			
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide	General
			CN 4, <u>Chameleon</u> , Vol. --, No. 2 (1916)
			CN 5, <u>Chameleon</u> , Vol. 21, No. 2 (1920)
			CN 5, <u>Chameleon</u> , Vol. 21, No. 7 (1920)
			CN 5, <u>Chameleon</u> , Vol. 23, No. 1 (1922)
			CN 5, <u>Chameleon</u> , Vol. 23, No. 3 (1922)
			CN 5, <u>Chameleon</u> , Vol. 25, No. 8 (1924)
			CN 5, <u>Chameleon</u> , Vol. 25, No. 9 (1924)
			CN 5, <u>Chameleon</u> , Vol. 25, No. 10 (1924)
			CN 5, <u>Chameleon</u> , Vol. 26, No. 1 (1925)
			CN 5, <u>Chameleon</u> , Vol. 28, No. 7 (1927)
			CN 5, <u>Chameleon</u> , Vol. 30, No. 3 (1929)
			CN 6, <u>The SWP</u> , Vol. 8, No. 7 (1906)
			CN 6, <u>Sherwin-Williams World</u> , Vol. 3, No. 2 (1944)

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APPENDIX G -- ORIGINAL DOCUMENTS*

Interrogatory No. 13			
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide	General
			CN 8, <u>The Home Decorator</u> (1936)
			CN 8, <u>The Spectrum</u> , June-July (1909)
			CN 10, Folder 8
			CN 19, Folder 5
			CN 19, Folder 9
			CN 19, Folder 10
			CN 22, Folder 6
			CN 28, Folder 2
			CN 28, Folder 5
			CN 29, Folder 2
			CN 29, Folder 3
			CN 29, Folder 6
			CN 29, Folder 12
			CN 30, Folder 10
			CN 30, Folder 13
			CN 31, Folder 4
			CN 41, <u>Chameleon</u> , Vol. 12, No. 3 (1909)
			CN 41, <u>Chameleon</u> , Vol. 12, No. 10 (1909)
			CN 41, <u>Chameleon</u> , Vol. 16, No. 5 (1917)

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APPENDIX G – ORIGINAL DOCUMENTS*

Interrogatory No. 13			
Lead Carbonate	Lead Sulphate	Leaded Zinc Oxide	General
			CN 41, Folder 2, <u>Chameleon</u> , Vol. 17, No. 2 (1917)
			CN 41, <u>Chameleon</u> , Vol. 18, No. 4 (1918)
			CN 41, Folder 3, <u>Chameleon</u> , Vol. 30, No. 2
			CN 41, Folder 4, <u>Sherwin-Williams World</u> , Vol. 3, No. 2 (1944)
			CN 41, Folder 4, <u>Sherwin-Williams World</u> , Vol. 3, No. 4 (1945)
			CN 41, Folder 4, <u>Sherwin-Williams World</u> , Vol. 5, No. 4 (1947)
Interrogatory No. 19			
CN 1, Folder 1			
CN 29, Folder 12			
CN 30, Folder 4			
CN 30, Folder 9			

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APPENDIX G -- ORIGINAL DOCUMENTS*

Interrogatory No. 20				
CN 5, <u>Chameleon</u> , Vol. 28, No. 7 (1927)				
CN 28, Folder 2				
CN 32, Folder 8				
Interrogatory No. 54				
CN 4, <u>Chameleon</u> , Vol. 7, No. 5 (1904)				
CN 6, <u>The SWP</u> , Vol. 6, No. 7 (1904)				
Interrogatory No. 1(d), Second Set				
Lead Carbonate	White Lead in Oil	Lead Sulphate	Leaded Zinc Oxide	General
	CN 30, Folder 13			CN 4, <u>Chameleon</u> , Vol. 13, No. 3 (1910)
				CN 41, <u>Chameleon</u> , Vol. 12, No. 10 (1909)

*References are to consecutive numbers ("CN") of boxes on index of original documents, and to specific documents or folders within such boxes.

APPENDIX H

MICROFILM DOCUMENTS			
Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
438	OSM Smelter 1929-30	Trade Accounts Receivable	20*
	Chicago White Lead 1929-30	Chicago White Lead Sales: Lead in Oil, ODP Soft Paste Lead, Zilo, Soft Paste Zilo and Carbonate recapitulations by date and city	*
		Accounts Receivable Trade	20*
		Production, Merchandise & Trading and Loss & Gain Account	13*
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Acct. #1	*
		Soft Paste Lead Mfg. Acct. #2	*
		Soft Paste Lead Mfg. Account -- The Lowe Bros. Spl.	*
		Lowe Bros. Special Soft Paste Lead Mfg. account #2	*
		Zinc Lead in Oil Mfg. Account 1	*
		Zinc Lead in Oil Mfg. Account 2	*
		Soft Paste Zilo Mfg. #1	*
		Soft Paste Zilo Mfg. #2	*
		Manufactured Merchandise -- Carbonate	13
		Soft Paste Lead -- Lowe Bros. Spl.	*
		Manufactured ODP	13
		Zilo Manufactured Merchandise	*

* Indicates items that appear not to be directly responsive to interrogatories, but that are identified to provide additional context.

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
438 (cont.)	Chicago White Lead 1929-30 (cont.)	Soft Paste Zilo -- Manufactured Merchandise	*
		Soft Paste Lead -- Manufactured Merchandise	*
		Carbonate Lead	13
		Wet Carbonate	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Gross Sales	19, 20*
		7-SWP-12606-12638; 12668; 12680- 681	*
		7-SWP-12639-12667; 12669-679; 12682-691; 12692-724	13
441	Chicago White Lead 1930-31	O.D.P. Manufacturing Account No. 1	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfd. Account #3	*
		Soft Paste Lead Mfg. Acct. #1	*
		Soft Paste Lead Mfg. Account -- The Lowe Bros. Co.	*
		Spl. Soft Paste Lead Mfg. Acct.	*
		Soft Paste Lead Account #2 -- The Lowe Bros. Special	*
		Zinc Lead in Oil Mfg. Acc. 1	*
		Zinc Lead in Oil Mfg. Acc. 2	*
		Soft Paste Zilo Mfg. #1	*
		Soft Paste Zilo Mfg. #2	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
441 (cont.)	Chicago White Lead 1930-31 (cont.)	Soft Paste Lead -- Manufactured Merchandise	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Zilo Manufactured Merchandise	*
		Soft Paste Zilo -- Manufactured Merchandise	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Gross Sales	20*
		Chicago White Lead Sales: Lead in Oil, Soft Paste Lead, Zilo, Soft Paste Zilo, Carbonate and ODP recapitulations by date and city	20*
		7-SWP-12725-12823	20*
442	Chicago White Lead 1930-31	7-SWP-12824-12891	20*
441	OSM Smelter 1930-31	Trade Accounts Receivable	20*
442	Chicago White Lead 1930-31	Chicago White Lead Sales: Carbonate recapitulations by city	20*
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd Acct #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Acct -- The Lowe Bros. Co.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
442 (cont.)	Chicago White Lead 1931-32 (cont.)	Spl. Soft Paste Lead Mfg. Acct #1	*
		Soft Paste Lead Account #2 -- The Lowe Bros. Co.	*
		Zinc Lead in Oil Mfg Account #1	*
		Zinc Lead in Oil Mfg Account #2	*
		Soft Paste Zilo Mfg Account #1	*
		Soft Paste Zilo Mfg #2	*
		Mfd Mdse -- Carbonate	13
		Mfd Mdse -- ODP	13
		Soft Paste Lead -- Mfd Mdse	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Gross Sales	20*
		Chicago White Lead Sales: Lead in Oil , ODP, Soft Paste Lead, Zilo, Soft Paste Zilo recapitulations by date and city	20*
		7-SWP-12892-12911	*
		Chicago White Lead Sales: Soft Paste Zilo and Carbonate recapitulations by date and city	20*
443	O.S.M. Smelter 1931-1932	Trade Accounts Receivable	20*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
443 (cont.)	Chicago White Lead 1931-32	7-SWP-12911-12942	20*
444	Chicago White Lead 1932-1933	Production, Merchandise & Trading and Loss & Gain Account	13*
		ODP Manufacturing Account #1	13
		Lead in Oil Mfd Account #2	*
		Lead in Oil Mfg Account #3	*
		Soft Paste Lead Mfg Account #1	*
		Soft Paste Lead Mfg Account #2	*
		Spl. Soft Paste Lead Mfg. Account - - The Lowe Bros. Co. Chicago Ill.	*
		Spl. Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account -- The Lowe Bros. Co.	*
		Spl Soft Paste Lead -- BW 102 & BW 104	*
		Spl Soft Paste Lead -- BW 102	*
		Spl Soft Paste Lead -- BW 102 & BW 104	*
		Spl Soft Paste Lead -- BW 103 & BW 105	*
		Spl Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. Account #2	*
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfd. Mdse Carbonate	13
		Mfd. Mdse Carbonate Purchased	19

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
444 (cont.)	Chicago White Lead 1932-1933 (cont.)	Mfd Mdse ODP	13
		Soft Paste Lead Mfd Mdse	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104	*
		B 143 - B 223 - BW 103 & BW 105 Mfd. Mdse.	*
		Zilo Mfd Mdse	*
		Soft Paste Zilo Mfd Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages -- Lead in Oil	*
		Merchandise Packages -- Spl. Lead in Oil Drums	*
		Suspense Account -- Dry White Lead Purchased	19
		Gross Sales	20*
445	Chicago White Lead 1932-33	Chicago WL Sales: Lead in Oil, Soft Paste Lead, Zilo, Soft Paste Zilo and Carbonate recapitulations by time period and city	20*
	O.S.M. Smelter 1932-1933	Trade Accounts Receivable	20*
	Chicago White Lead 1932-33	7-SWP-12943-13042	20*
446	Chicago White Lead 1933-1934	Production, Merchandise & Trading and Loss & Gain Account	13 *
		ODP Mfg. Account #1	13

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
446 (cont.)	Chicago White Lead 1933-1934 (cont.)	Lead in Oil Mfd Account #2	*
		Lead in Oil Mfd Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Mfg. Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & BW 104	*
		Spl. Soft Paste Lead -- BW 102	*
		Spl. Soft Paste Lead -- BW 102 & BW 104	*
		Spl. Soft Paste Lead -- BW 103 & BW 105	*
		Spl. Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. Carbonate Purchased	19
		Mfd. Mdse. ODP	13
		Soft Paste Lead	*
		Soft Paste Lead The Lowe Bros. Spl.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
446 (cont.)	Chicago White Lead 1933-1934 (cont.)	Spl. Soft Paste Lead -- BW 102 & 106 Mfd. Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd Mdse	*
		Soft Paste Zilo Mfd. Mdse.	*
		Merchandise Packages Dry Lead	13
		Merchandise Packages Lead in Oil	*
		Merchandise Packages Special Lead in Oil Drums	*
		Suspense Account -- Dry White Lead Purchased	19
		Gross Sales	19, 20*
		7-SWP-13043-044	20*
448	Chicago White Lead 1934-35	Production, Merchandise & Trading and Loss & Gain Account	13*
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account The Lowe Bros. Co. Chicago, Ill.	*
		Special Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 102	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
448 (cont.)	Chicago White Lead 1934-35 (cont.)	Special Soft Paste Lead -- BW 102 & BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Special Soft Paste Lead -- BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zilo Zinc Lead in Oil Mfg. Account #2	*
		Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfg. Mdse Carbonate	13
		Mfd. Merchandise -- Carbonate Purchased	19
		Mfd. Mdse O.D.P.	13
		Soft Paste Lead	*
		Soft Paste Lead The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Manufactured Mdse.	*
		BW 103 BW 105 Mfd Mdse	*
		Zilo Mfd Mdse	*
		Soft Paste Zilo -- Mfd Mdse	*
		Dry Leaded Zinc	*
		Merchandise Packages -- Lead in Oil	*
		Merchandise Packages Dry Lead	13
		Gross Sales.	20*
		7-SWP-13045	20*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
448 (cont.)	O.S. & M. -- Smelter 1934-35	Merchandise & Trading	20*
		Trade Accounts Receivable	20*
		Mfd. Mdse. Leaded Zinc Oxide	13
1799	Chicago White Lead 1935-36	ODP Manufacturing Account #1	13
		ODP Manufacturing Account	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. Account #1 The Lowe Bros. Co., Chicago, Ill.	*
		Special Soft Paste Lead Mfg. Account #1	*
		Spl. Lead Mfg. Account #2 Lowe Bros.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 102	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 103 and BW 105	*
		BW 103	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. Zilo Account #2	*
		Soft Paste Lead Mfg. Account #1	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1799 (cont.)	Chicago White Lead 1935-36 (cont.)	Soft Paste Zilo Mfg. Account #1	*
		Soft Paste Zilo Mfg. Account #2	*
		Mfg. Mdse. Carbonate	13
		Mfd. Merchandise -- Carbonate Purchased	19
		Mfd. Mdse. ODP	13
		Soft Paste Lead	*
		Soft Paste Lead #1 The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Manufactured Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Gross Sales	20*
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	*
		Loss & Gain	19
		O.D.P. Manufacturing A/C #1	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfd. A/C #3	*
		Soft Paste Lead Mfg. a/c #1	*
		Soft Paste Lead A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1799 (cont.)	Chicago White Lead 1935-36 (cont.)	Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. Zilo A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Sample Shipments of Lead Products	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 -- BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc	*
		Mdse. Pkgs. Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
	O.S. and M. -- Smelter 1935-36	Trade Accounts Receivable	20*
		Mfd. Mdse. Leaded Zinc Oxide	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
1801	O.S. and M. -- Smelter 1936-37	Trade Accounts Receivable	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1801 (cont.)	O.S. and M. -- Smelter 1936-37 (cont.)	Mfd. Mdse. Leaded Zinc Oxide	13
		Leaded Zinc Oxide Purchased from American Zinc Sales Co.	19
		Leaded Zinc Oxide Purchased from New Jersey Zinc Co.	19
		Leaded Zinc Oxide Purchased from E.I. DuPont	19
		Leaded Zinc Oxide Purchased from Eagle Picher Co.	19
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Leaded Zinc Oxide Sales	20*
1802	Chicago White Lead 1936-37	Prepaid Carbonate Account	*
		Loss and Gain	19
		ODP Manufacturing Account	13
		Lead in Oil Mfd. Account #2	*
		Lead in Oil Mfg. Account #3	*
		Soft Paste Lead Mfg. Account #1	*
		Soft Paste Lead Account #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Soft Paste Lead Mfg. A/C #2 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. Account #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl Soft Paste Lead -- BW 102	*

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Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1802 (cont.)	Chicago White Lead 1936-37 (cont.)	Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. Account #1	*
		Zinc Lead in Oil Mfg. A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfg. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Spl.	*
		Spl. Soft Paste lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 BW105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Purchased Dry White Lead	19
		Gross Sales	13, 20 *
		Dry Leaded Zinc	*
		Merchandise Packages -- Lead in Oil	*
		7-SWP-13046	20*
1804	O.S. and M -- Smelter 1937-38	Trade Accounts Receivable	20*
		Dry White Lead 18 Dry	13
		Mfd. Mdse. Leaded Zinc Oxide	13

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1804 (cont.)	O.S. and M -- Smelter 1937-38 (cont.)	Lead & Leaded Zinc Mfd. Mdse.	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C (Oxide in system)	*
		Sales Leaded Zinc Oxide	20*
1805	Chicago White Lead 1937-38	ODP Manufacturing A/C #1	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfg. A/C #3	*
		Soft Paste Lead Mfg. A/C #1	*
		Soft Paste Lead Mfg. A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Spl. Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. Zilo A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		C-50 Lead & Leaded Zinc	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1805 (cont.)	Chicago White Lead 1937-38 (cont.)	Soft Paste Lead A/C The Lowe Bros. Spl.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Mfd. Mdse. C-50 Lead & Leaded Zinc	*
		Purchased Dry White Lead	19
		Gross Sales	20*
		Dry Leaded Zinc	*
	O.S. & M. Div. -- Smelter 1938-39	Trade Accounts Receivable	20*
		Dry White Lead	*
		Mfd. Mdse. Leaded Zinc Oxide	13
		Mfd. Mdse. Lead & Leaded Zinc C 50	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Sales Leaded Zinc Oxide	20*
		Sales Leaded Zinc Oxide C 50	20*
1806	Chicago White Lead 1938-39	Untitled Account following "Plant Alteration Expense" account with "Output" column	13
		ODP Manufacturing A/C	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfg. A/C #3	*
		Soft Paste Lead Mfg. A/C #1	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1806 (cont.)	Chicago White Lead 1938-39 (cont.)	Soft Paste Lead A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*
		Spl. Soft Paste Lead - BW 102 and BW 104	*
		Special Soft Paste Lead - BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. Zilo A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 -- BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Purchased Dry White Lead	19
		C-50 Lead & Leaded Zinc	13
		Dry Leaded Zinc	*
		Merchandise Packages Dry Lead	13

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1806 (cont.)	Chicago White Lead 1938-39 (cont.)	Mdse. Pkgs. -- Lead in Oil	*
		Mdse. Pkgs. -- Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
		Mdse. Pkgs. -- Dry Lead	13
1808	OS&M Div -- Smelter 1939-40	Trade Accounts Receivable	20*
		Mfd. Mdse. Leaded Zinc Oxide	13
		Purchase of Leaded Zinc Oxide	19
		Purchase of Leaded Zinc Oxide	19
		Mfd. Mdse. Lead & Leaded Zinc C 50	13
		Leaded Zinc Oxide Sales	20*
		Sales Lead & Leaded Zinc C 40 and C 50	20*
1809	Chicago White Lead 1939-40	Loss & Gain	*
		Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		ODP Manufacturing A/C #1	13
		Lead in Oil Mfd. A/C #2	*
		Lead in Oil Mfd. A/C #3	*
		Soft Paste Lead Mfg. a/c #1	*
		Soft Paste Lead A/C #2	*
		Spl. Soft Paste Lead Mfg. A/C #1 The Lowe Bros. Co. Chicago, Ill.	*
		Spl. Lead Mfg. A/C #2 The Lowe Bros. Co.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1809 (cont.)	Chicago White Lead 1939-40 (cont.)	Spl. Soft Paste Lead -- BW 102 and BW 104	*
		Special Soft Paste Lead -- BW 103 and BW 105	*
		Zinc Lead in Oil Mfg. A/C #1	*
		Zinc Lead in Oil Mfg. A/C #2	*
		Soft Paste Zilo Mfg. A/C #1	*
		Soft Paste Zilo Mfg. A/C #2	*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 -- BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc	*
		Mdse. Pkgs. Dry Lead	13
		Mdse. Pkgs -- Lead in Oil	*
1810	Chicago White Lead 1940-41	Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1810 (cont.)	Chicago White Lead 1940-41 (cont.)	Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Precipitated Dry White Lead	13
		Dry Leaded Zinc	*
		Mdse. Packages Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
	Ozark Smelting and Refining Co. Division	Trade Accounts Receivable	19, 20*
		Mfd. Mdse Leaded Zinc Oxide	13
		Memorandum of OPM Stock of Leaded Zinc Oxide	*
		Mfd. Mdse. Lead & Leaded Zinc C 50	13
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Leaded Zinc Oxide Sales	*
		Sales Lead & Leaded Zinc C 40 and C 50	20*
1813	Chicago White Lead 1941-42	Chicago White Lead unnamed account containing "output" and "sales" columns	13
		Mfd. Mdse. Carbonate Purchases	19
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1813 (cont.)	Chicago White Lead 1941-42 (cont.)	Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*
		Soft Paste Lead A/C The Lowe Bros. Co.	*
		BW 103 BW 105 Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Mdse. Packages Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
1814	O.S.M. Smelter 1941-1942	Trade Accounts Receivable	20*
		Mfd. Mdse. Leaded Zinc Oxide	13
		Memorandum of OPM Stock of Leaded Zinc Oxide #412	20
		Memorandum of OPM Stock of Leaded Zinc Oxide #413	*
		Memorandum of OPM Stock of Leaded Zinc Oxide #1526	*
		Sublimed White Lead for Resale	20*
		Oxide in Pans, hoppers and bags Special Lead Zinc Oxide A/C	*
		Leaded Zinc Oxide Sales	20*
1815	Chicago White Lead 1942-43	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		Mfd. Mdse. Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Spl. Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1815 (cont.)	Chicago White Lead 1942-43 (cont.)	Soft Paste Lead A/C The Lowe Bros. Co.	*
		BW 103 BW 105 Mfd. Mdse	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc	*
		Mdse. Packages Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
1816	O.S.M. Smelter 1942-1943	Sales: Leaded Zinc Oxide	*
		Sales: Sublimed White Lead	20*
1817	O.S. & M. Div. Smelter 1943-44	Mfd. Mdse. -- Leaded Zinc Oxide	13
		#412 Zinc Oxide Purchased from Amer. Zinc. Sales Co.	19
		Sublimed White Lead for Resale	19, 20
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	*
		Sales #414 Oxide	*
1818	Chicago White Lead 1943-44	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		Mfd. Mdse. Carbonate Purchased	19
		Mfd. Mdse. -- Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Special Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1818 (cont.)	Chicago White Lead 1943-44 (cont.)	Soft Paste Lead Account -- Lowe Bros.	*
		BW 103, BW 105 -- Mfd. Mdse.	*
		Zilo Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc	*
		Dry Leaded Zinc (Trail Fume)	*
		Mdse. Pkgs. -- Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
1819	O.S.M. Smelter 1944-1945	Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		#412 Zinc Oxide Purchased from Amer. Zinc Sales Co.	19
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20*
		Sales -- #414 Oxide	20*
		#414 Oxide	*
1820	Chicago White Lead 1944-45	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		Duty -- Canadian Lead	20
		Mfd. Mdse. -- Carbonate	13
		Mfd. Mdse. -- ODP	13
		Soft Paste Lead	*
		Special Soft Paste Lead -- BW 102 & 104 Mfd. Mdse.	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1820 (cont.)	Chicago White Lead 1944-45 (cont.)	BW 103 BW 105 -- Mfd. Mdse.	*
		Soft Paste Zilo -- Mfd. Mdse.	*
		Dry Leaded Zinc (412-413)	*
		Dry Leaded Zinc (Trail Fume #414)	*
		Mdse. Pkgs. Lead in Oil & Dry	13
		Mdse. Pkgs. -- Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
		Precipitated White Lead	13
		Packing Lead in Oil	*
1820	Chicago White Lead 1945-46	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		Carbonate for Canada	20
		White Lead Processing Carter White Lead Co. -- Canada	20
		Mfd Mdse -- Carbonate	13
		Mfd. Mdse -- ODP	13
		Soft Paste Lead	*
		Special Soft Paste Lead -- BW102 and 104 - 103-152 Mfd Mdse	*
		Soft Paste Zilo -- Mfd Mdse	*
		National Lead -- Canada	20
		Dry Leaded Zinc (412-413)	*
		Dry Leaded Zinc (Trail Fume #414)	*
		Mdse. Pkgs. -- Dry Lead	13
		Mdse. Pkgs. -- Lead in Oil	*
		Precipitated White Lead	13

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1820 (cont.)	Chicago White Lead 1945-46 (cont.)	Packing Lead in Oil	*
1822	O.S. & M. Div. Smelter 1945-46	Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	*
		Sales -- #414 Oxide	*
1823	O.S.M. Smelter 1946-1947	Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20*
		Sales -- #414 Oxide	20*
1824	Chicago White Lead 1946-47	Chicago White Lead unnamed account containing "output" and "sales" columns	13, 20*
		Duty -- Canadian Lead	20
		Dry Leaded Zinc (Trail Fume (414))	*
		Mdse. Pkgs. - Dry Lead & Lead in Oil	13
		Packing Lead in Oil	*
	OS&M Div Smelter 1947-48	Trade Accounts Receivable	20*
		Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20*
		Sales -- #414 Leaded Zinc Oxide	20*

APPENDIX H

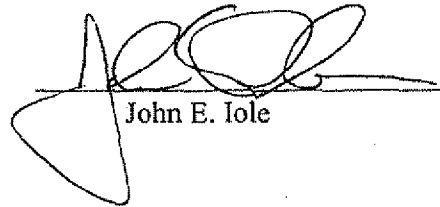
Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1824 (cont.)	Lead Processing 1946-47	National Lead Processing: Carbonate Manufacturing	*
		National Lead Processing: Mdse. Pkgs. Dry Lead & Lead in Oil accounts by city	*
	Lead Processing 1946-1947	7-SWP-13054-055; 13058; 13065-066; 13068; 13074; 13076	*
1825	Lead Processing 1947-48	Accounts for Chicago, Philadelphia, Perth Amboy, Brooklyn, St. Louis and San Francisco: Soft Paste Lead in Oil -- Rx 17, Carbonate Manufacturing, Mdse. Pkgs. -- Dry Lead in Oil, Soft Paste Lead in Oil - Rx 17	*
	Lead Processing 1947-48	7-SWP-13104; 13106-108; 13110; 13114-13124; 13129-132; 13143-146; 13148-149; 13152-13155; 13161-162; 13164-167; 13170-174; 13176; 13179	*
1827	Coffeyville--Smelter 1948-49	Mfd. Mdse. -- Leaded Zinc Oxide	13
		Mfd. Mdse. -- #414 Oxide	13
		Oxide in Pans, Hoppers & Bags -- Spec. Leaded Zinc Oxide Account	*
		Sales -- Leaded Zinc Oxide	20*
		Sales -- #414 Oxide	20*
		Sales Freight -- Leaded Zinc Oxide #412	20*
		Sales Freight -- Leaded Zinc Oxide #414	20*
	Lead Processing 1948-1949	National Lead Lead Product Manufacturing Accounts for Soft Paste Lead Rx 17, Carbonate, Mdse. Pkgs. Dry Lead and Lead in Oil	*

APPENDIX H

Microfilm Reel No.	File Title (Plant/Year)	Account Title	Interrogatory No.
1827 (cont.)	Lead Processing 1948-49 (cont.)	7-SWP-13180-13190; 13201; 13204-214; 13217; 13222; 13226- 13233; 13244	*

CERTIFICATE OF SERVICE

I hereby certify that, on November 30, 1998, I served true and correct copies of the within Defendant The Sherwin-Williams Company's Supplemental Responses to Interrogatory Nos. 10, 13, 16, 19, 20 and 54 of Plaintiffs' First Set of Interrogatories to All Defendants and Interrogatory No. 1(d) and (e) of Plaintiffs' Second Set of Interrogatories to All Defendants by first-class mail, postage pre-paid, on the counsel on the attached list.



John E. Iole

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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0007-SWP-0072741

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK, THE NEW
YORK CITY HOUSING AUTHORITY, and
THE NEW YORK CITY HEALTH AND
HOSPITALS CORPORATION,

Plaintiffs,

-against-

LEAD INDUSTRIES ASSOCIATION, INC.,
NL INDUSTRIES, INC., EAGLE-PICHER
INDUSTRIES, INC., ATLANTIC RICHFIELD
COMPANY, THE SHERWIN-WILLIAMS
COMPANY, SCM CORPORATION, THE
GLIDDEN COMPANY, AMERICAN
CYANAMID and FULLER-O'BRIEN
CORPORATION,

Defendants.
-----X

Index No. 14365/89

IAS Part 39
Justice Freedman

Referee Roberts

DEFENDANT THE SHERWIN-
WILLIAMS COMPANY'S
RESPONSES AND
OBJECTIONS TO PLAINTIFFS'
SECOND SET OF
INTERROGATORIES AND
DOCUMENT REQUESTS TO
ALL DEFENDANTS

In accordance with Rules 3101, 3122, 3130-3134 of the New York Civil Practice Law and Rules ("CPLR"), Defendant The Sherwin-Williams Company ("Sherwin-Williams") responds to plaintiffs' second set of interrogatories and requests for documents to all defendants. These responses are subject to, limited by and without waiver of Sherwin-Williams' Objections to Disclosure, which are set forth following the responses and are incorporated into each response.

PRELIMINARY STATEMENT

Sherwin-Williams objects to plaintiffs' discovery requests as fundamentally unfair and a violation of due process because plaintiffs refuse to respond to Sherwin-Williams' discovery requests to plaintiffs (Sherwin-Williams' First and Second Interrogatories to NYCHA

of 7/3/97). Sherwin-Williams further objects that plaintiffs' refusal to respond to Sherwin-Williams' discovery requests is a denial of Sherwin-Williams' right to discovery and an impediment to a fair and an efficient adjudication of this controversy.

Plaintiffs' requests are extremely broad in subject matter, cover a vast expanse of time, seek information regarding documents from long-defunct activities, and substantially duplicate previous disclosure requests. Plaintiffs already have served hundreds of interrogatories and document requests on Sherwin-Williams. Sherwin-Williams has already produced to plaintiffs more than 34,000 pages of material, including 1,597 pages of document indices and 1,423 pages of a document card catalog. Sherwin-Williams also has made available to plaintiffs in this action more than 11,230 pages of documents that Sherwin-Williams produced in German v. Federal Home Loan Mortgage Corp., Civ. A. No. 93 Civ 6941 (MBM). In addition, Sherwin-Williams has made witnesses available to testify regarding the search of Sherwin-Williams' records. Sherwin-Williams also has conducted numerous supplemental searches at plaintiffs' request, and never has refused any reasonable request for information. Sherwin-Williams objects to conducting any further search for documents. Subject to its objections, Sherwin-Williams is responding to this set of interrogatories and requests for documents based on available information after a reasonable and diligent search of records maintained in the course of its business. If Sherwin-Williams obtains additional information responsive to these interrogatories and document requests, Sherwin-Williams reserves the right to supplement or amend these responses.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 1

State, separately, for dry white lead carbonate, white lead-in-oil, white lead sulphate and leaded zinc oxide:

- a. The years in which defendant produced the product;
- b. The location(s) of all plants in which defendant produced each product.
- c. The years when each plant produced each product.
- d. In tons or in pounds, each plant's maximum capacity for producing each product. If a plant's maximum production capacity every changed, state both the original plant capacity and the new plant capacity and indicate when that change went into effect.
- e. For each plant in which defendant produced each product, each year when the plant's total production of each product was below its maximum capacity, and, to the extent known, by how much.

RESPONSE:

Sherwin-Williams objects to this interrogatory, and each of its subparts, because it substantially duplicates Interrogatory Nos. 13 and 26 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. The interrogatory is also overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objections, Sherwin-Williams states as follows:

- a. Sherwin-Williams began producing white lead carbonate in approximately 1910 and ceased production of white lead carbonate by June 1947. Sherwin-Williams never produced white lead sulfate as a pigment. Sherwin-Williams produced leaded zinc oxide during the relevant period but is not aware of the precise amounts of pigment

produced, or the number or length of any gaps in production. Sherwin-Williams believes that it began production in approximately 1906.

- b. All of Sherwin-Williams' white lead carbonate was manufactured at its plant in Chicago, Illinois. Sherwin-Williams produced leaded zinc oxide in Coffeyville, Kansas.
- c. See responses to subparts (a) and (b).
- d. To the extent it is available, certain information responsive to subparts (d) and (e) is contained in the Board of Operators meeting minutes that Sherwin-Williams has already produced to plaintiffs in this action.
- e. See response to subpart (d).

Sherwin-Williams has already produced available documents to plaintiffs. See, e.g., 35-SWP-10527-13550; 7-SWP-4645-59, 4677-78, 4814-73, 4875-81, 5396-5422, 14190-16221, 21821-30428.

Interrogatory No. 2

Identify all records, ledgers, tabulations or other compilations of sales, [sic] shipments of dry white lead carbonate, white lead-in-oil, lead sulphate, or leaded zinc oxide.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory Nos. 11, 12, 13 and 16 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. This interrogatory is also overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objections, Sherwin-Williams states that in connection with a proceeding before the Federal Trade Commission in 1944, Sherwin-Williams submitted

proposed findings of fact that, for the years 1938-41, Sherwin-Williams shipped less than 1% of the white lead carbonate shipped by the industry during the same period. Sherwin-Williams has already produced available documents to plaintiffs. See, e.g., 7-SWP-12606-18625, 21821-30428; 35-SWP-10527-13550. To the extent responsive information may be contained in public records, those records are equally available to and apparently possessed by plaintiffs.

Interrogatory No. 3

Identify all former or present managers, assistant managers, superintendents, assistant superintendents, foremen, controllers, accountants, and bookkeepers of defendant's white lead plants.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of its objections, Sherwin-Williams states that it has already produced documents to plaintiffs that contain the names of former employees. See, e.g., 7-SWP-5200-10.

Interrogatory No. 4

Identify all former or present managers, assistant managers, superintendents, controllers, accountants, and bookkeepers of defendant who participated in tabulating or otherwise compiling information reflecting defendant's sales, shipments, and/or production of white lead.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Sherwin-Williams states that it has already produced documents to plaintiffs that contain the names of former employees.

Interrogatory No. 5

Identify all employees or former employees of defendant who at any time had knowledge or information concerning defendant's regional or national white lead sales, shipments, or production figures.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of its objections, Sherwin-Williams states that the following persons, based solely on their job titles in a 1913 roster, may have had information concerning Sherwin-Williams' production or sales of white lead carbonate or leaded zinc oxide: Adrian D. Joyce, general manager, department of sales and distribution, J.C. Beardslee, general manager, manufacturing department, H.J. Hain, general superintendent, manufacturing department, and George A. Martin, general manager, auxiliaries department. See 7-SWP-5198-5199. Sherwin-Williams further states that it has not located any person who has substantive personal knowledge of the information requested. Sherwin-Williams has already produced documents to plaintiffs that contain the names of former employees. See, e.g., 7-SWP-5200-10.

Interrogatory No. 6

Identify all employees or former employees of defendant who filed reports concerning sales, shipments, and/or production of white lead with government agencies, including but not limited to the Bureau of Mines, the Census Bureau and the Federal Trade Commission, and/or the LIA.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Sherwin-Williams has already produced available documents to plaintiffs. To the extent

responsive information may be contained in public records or LIA records, those records are equally available to plaintiffs.

Interrogatory No. 7

Identify the source(s) of all purchases of white lead that Sherwin-Williams made from 1947-59. State the quantity of each purchase in terms of tonnage, pounds and/or dollar amounts.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 19 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. Sherwin-Williams further objects that this interrogatory is vague and ambiguous in the use of the phrase "white lead that Sherwin-Williams made." As stated in response to Interrogatory No. 1, Sherwin-Williams did not make white lead carbonate after 1947. Sherwin-Williams believes that plaintiffs may have intended to ask for information regarding "purchases that Sherwin-Williams made from 1947-59 of white lead." In response to the interrogatory as restated by Sherwin-Williams, and subject to and without waiver of its objections, Sherwin-Williams states that available documents have already been produced to plaintiffs. See, e.g., 7-SWP-12606-18625, 21821-30428, 35-SWP-10527-13550.

Interrogatory No. 8

Identify all sales of white lead that National Lead made to Sherwin-Williams during the years 1947-59.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is vague in its use of the phrase "sales of white lead that National Lead made." Subject to and without waiver of its objections, Sherwin-Williams states that to the extent responsive information, if any, may be contained in available documents. Sherwin-Williams has already produced them to plaintiffs.

Interrogatory No. 9

For any time period that defendant has any information, state National Lead's production, sale, and/or shipment tonnage of dry white lead carbonate, white lead-in-oil, and/or white lead sulphate. Identify all sources of information used to respond to this interrogatory.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory Nos. 14 and 16 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. Sherwin-Williams further objects that this interrogatory is premature and calls for information that is either a matter of expert opinion or more reasonably available from other entities or public sources. Subject to and without waiver of its objections, Sherwin-Williams states that the records of the Federal Trade Commission in the 1940s appear to contain responsive information. Sherwin-Williams believes that plaintiffs have already obtained this information.

Interrogatory No. 10

For each year that defendant has any information, state Eagle-Picher's tonnage of dry white lead carbonate, lead-in-oil, and/or white lead sulphate. Identify all sources of information used to respond to this interrogatory.

RESPONSE:

Sherwin-Williams objects to this interrogatory as overbroad and outside the scope of this case because it calls for information concerning an entity that is not a party to this litigation. Furthermore, Sherwin-Williams objects because the interrogatory substantially duplicates Interrogatory Nos. 14 and 16 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. Sherwin-Williams further objects that this interrogatory is premature and calls for information that is either a matter of expert opinion or more reasonably available from other entities or public sources. Subject to and without waiver of

its objections, Sherwin-Williams states that the records of Federal Trade Commission in the 1940s appear to contain responsive information. Sherwin-Williams believes that plaintiffs have already obtained this information.

Interrogatory No. 11

Identify all documents which show that dry white lead carbonate or white lead-in-oil was used in a product other than paint.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is overly broad, vague and ambiguous in its use of the term "paint." Sherwin-Williams also objects that this interrogatory is premature in calling for information that is a matter of expert opinion, not fact discovery. Sherwin-Williams has already produced responsive documents to plaintiffs. See, e.g., 7-SWP-5495-514.

Interrogatory No. 12

Identify all correspondence between any plaintiff and any defendant in this action regarding white lead pigment and/or white lead based paints.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 58 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. In addition, this interrogatory is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and vague and ambiguous in the use of the phrase "regarding white lead pigment and/or white lead based paints." Subject to and without waiver of its objections, Sherwin-Williams is not presently aware of any responsive documents possessed by Sherwin-Williams.

Interrogatory No. 13

Identify all correspondence regarding white lead pigment and/or white lead based paints between or among any defendants in this action.

RESPONSE:

Sherwin-Williams objects to this interrogatory as vague and ambiguous in the use of the phrase "regarding white lead pigment and/or white lead based paints." Sherwin-Williams further objects to this interrogatory to the extent it calls for material protected from disclosure under the attorney-client privilege and the attorney work product and trial preparation protections. This interrogatory is also overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objections, Sherwin-Williams states that responsive documents have already been produced to plaintiffs. See, e.g., 7-SWP-5943-46, 6904-05.

Interrogatory No. 14

Identify all correspondence to and from defendant regarding white lead pigment and/or white lead based paints.

RESPONSE:

Sherwin-Williams objects to this interrogatory as vague and ambiguous in the use of the phrases "to and from defendant" and "regarding white lead pigment and/or white lead based paints." Sherwin-Williams further objects to this interrogatory to the extent it calls for material protected from disclosure under the attorney-client privilege and the attorney work product and trial preparation protections. This interrogatory is also overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of its objections, Sherwin-Williams states that responsive documents have already been produced to plaintiffs. See, e.g., 7-SWP-5909-11, 6910-17, 6936-38.

Interrogatory No. 15

For any lead pigment other than white lead, e.g., red lead, lead chromate:

- a. State the amount per year of the lead pigment sold, shipped, or produced by defendant.
- b. State whether the defendant ever produced, promoted and/or sold the lead pigment or paints for use on interior surfaces or residential buildings occupied by children and if so, the inclusive years in which such pigment and/or paint was produced or sold and the purposes for which such pigment and/or paint was intended to be used.
- c. State all entities which produced or promoted the use of such lead pigments for use in paints to be applied to interior residential surfaces. Identify all documents used to respond to this interrogatory.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it seeks information that is irrelevant to plaintiffs' allegations in this litigation. As plaintiffs have stated: "The substances at issue in this case are white carbonate and lead sulfate."¹ Pls.' Resps. to Defs.' Interrogs. of 7/892 at 3-4; Pls.' Resps. to Defs.' Reqs. for Prod. of 7/8/92 at 4. This interrogatory asks for information regarding the production of pigments that plaintiffs have not alleged to be the source of their claims and therefore is not relevant. The use of red lead or lead pigments other than white lead carbonate or white lead sulfate in plaintiffs' properties might explain the alleged presence of lead in certain properties, but is not a basis for liability.

¹ Plaintiffs have also stated: "Who produced and applied non-white-lead paints is not relevant to this litigation." Letter from J. R. Low-Beer to Ref. Roberts of 1/16/97 at 2.

Interrogatory No. 16

Identify any laboratory or research facility owned, operated, affiliated [sic] or under contract directly or indirectly with defendant which performed or performs research concerning pigment or paint chemistry or technology or the identification of pigment or paint. (For NL, one such laboratory was located in Highstown, New Jersey.) For each such laboratory or research facility, identify any index or description of documents produced by or concerning the facility. State where such documents are currently located.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 21 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. Sherwin-Williams further objects to this interrogatory as vague in the use of the terms "research facility," "directly or indirectly," "research" and "identification of pigment or paint." Subject to and without waiver of its objections, Sherwin-Williams identifies the Allied Research Laboratory in Chicago, Illinois and the Cleveland Technical Services Department in Cleveland, Ohio. In addition, plants and factories had laboratory capabilities at certain times. Sherwin-Williams has already produced responsive documents to plaintiffs. See, e.g., 7-SWP-6669-6705, 6832-72, 6883-92, 7113-18, 7148-54, 7279-312, 18707, 18716, 18633-92, 18760-78.

Interrogatory No. 17

Identify all documents which contain identifications or attempted identifications of lead pigment or lead paint by manufacturer. Identify all individuals who have attempted to identify the manufacturer of a sample of lead pigment or lead paint.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 21 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants. Sherwin-Williams further objects to this interrogatory because it

is premature in calling for information that is a matter of expert opinion, and is vague and ambiguous in its use of the phrases "identifications of lead pigment or lead paint by manufacturer" and "identify the manufacturer of a sample of lead pigment or lead paint." In addition, Sherwin-Williams objects to this interrogatory because to the extent it calls for material covered under New York law by the attorney work product and trial preparation protections, such material is protected from disclosure. Subject to and without waiver of its objections, Sherwin-Williams states that it is not aware of any attempt it has made in the ordinary course of its business to identify the manufacturer of lead pigment from a sample of lead pigment or paint containing lead pigment. Further, based on information reasonably available at the time these responses are served, Sherwin-Williams is not aware of any method by which a person can analyze a sample of old paint removed from a dwelling surface and reliably determine the manufacturers of the paints or pigments in that sample.

Interrogatory No. 18

Identify all documents concerning the results of chemical analyses of white lead pigments, including but not limited to x-ray diffraction, electron microprobe, and x-ray fluorescence.

RESPONSE:

Sherwin-Williams objects that this interrogatory is so vague and ambiguous in its use of the phrase "concerning the results of chemical analyses" that it cannot be understood or answered. The interrogatory is also overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objections, Sherwin-Williams states that it has already produced documents concerning certain analyses to plaintiffs. See, e.g., 7-SWP-5701-15, 18633-18778.

Interrogatory No. 19

State whether defendant has ever sponsored research concerning white lead, or the health effects of lead, at a university, hospital or other research center. If so, state how much money was provided, when it was provided, what other entities participated in cosponsoring such research, where this research was conducted, who was in charge of this research [sic] what research was conducted, and whether the results of this research were published or otherwise disseminated to the general public. State where the research was published or otherwise disseminated. Identify all documents used to respond to this interrogatory.

RESPONSE:

Sherwin-Williams objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence because the interrogatory is not limited to health risks to children. Sherwin-Williams also objects to this interrogatory because it substantially duplicates Interrogatory No. 53 and Requests for Documents Nos. 17, 19 and 31(2) of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants, as well as Request for Documents No. 15(2) of Plaintiffs' Interrogatories and Requests for Documents Regarding Fraudulent Statements. Sherwin-Williams further objects to this interrogatory as vague in the use of the phrases "research" and "health effects of lead." Subject to and without waiver of its objections, Sherwin-Williams states that to the extent documents, if any, related to research concerning the health risks of lead to children are reasonably available, Sherwin-Williams has already produced them to plaintiffs.

Interrogatory No. 20

State whether defendant was ever the subject of an investigation or was ever found to have violated any city, state or federal law with respect to the sale of dry white lead carbonate, lead in oil, white lead sulphate, leaded zinc oxide, red lead or lead chromate or paints containing dry white lead carbonate, lead in oil, white lead sulphate, leaded zinc oxide, red lead, or lead chromate. If so, state the circumstances, which pigments and/or paints were involved, and the penalty, if any, that was imposed on defendant.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it seeks information that is irrelevant to this litigation and is vague in its use of the phrases "subject to an investigation," "found to have violated" and other ambiguous and undefined terms. Sherwin-Williams further objects to this interrogatory as overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and without waiver of its objections, Sherwin-Williams believes that it has acted in good faith compliance with all applicable city, state and federal laws, regulations and standards, and has never knowingly violated any such law. Moreover, Sherwin-Williams is not aware of any investigation or violation that relates to the time period or products that plaintiffs claim to be at issue in this case.

Interrogatory No. 21

State whether defendant has ever violated any policy of the LIA with respect to the sale of dry white lead carbonate, lead in oil, white lead sulphate, leaded zinc oxide, red lead or lead chromate or paints containing dry white lead carbonate, lead in oil, white lead sulphate, leaded zinc oxide, red lead, or lead chromate. If so, state the circumstances and indicate each pigment and/or paint that violated LIA policy.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is vague and ambiguous in its use of the terms "violated" and "policy." Subject to and without waiver of its objections, Sherwin-Williams states that it is unable to discern the policy to which this interrogatory refers and is not aware of any violation.

Interrogatory No. 22

State whether defendant ever warned of -- or provided advice about -- the health consequences of lead paint to present or former customers or consumers or to owners of residential properties, hospitals or other institutions.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 10 and Requests for Documents Nos. 21, 25 and 31(4) of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants and Requests for Documents Nos. 9 and 15(4) of Plaintiffs' Interrogatories and Requests for Documents Regarding Fraudulent Statements. Sherwin-Williams further objects that this interrogatory is vague and ambiguous in the use of the terms "warned of," "provided advice," "health consequences," and "former customers or consumers." Subject to and without waiver of its objections, Sherwin-Williams states that its lead-containing products would have been labeled as such, and therefore would have alerted the user. Sherwin-Williams has produced available documents that show products labeled with warnings concerning health risks of lead. Sherwin-Williams believes that it acted in good faith compliance with all applicable laws, regulations and standards. Sherwin-Williams further states that the American Standards Association ("ASA") (later known as the American National Standards Institute ("ANSI")) established the Z66.1 standard in 1955 (providing that paint suitable for surfaces which might be chewed by children not contain more than 1% lead by weight), and that Sherwin-Williams has marketed its products in conformity with this standard. Sherwin-Williams was also a member, at certain times, of organizations that provided educational information and warnings regarding the misuse of paint containing lead. Sherwin-Williams has already produced responsive documents to plaintiffs. See, e.g., 7-SWP-275, 331-32, 5912-13, 5961-83. Additional documents are available directly from those organizations.

Interrogatory No. 23

State whether defendant ever advised present or former customers or consumers or owners of residential properties, hospitals or other institutions concerning the hazards of lead pigment or lead paint, ways to maintain lead paint to minimize hazards or safety risks or methods to abate lead paint by removal, encapsulation, or enclosure.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it substantially duplicates Interrogatory No. 10 and Request for Production No. 21 of Plaintiffs' First Set of Interrogatories and First Set of Requests for Documents to All Defendants and Request for Production No. 9 of Plaintiffs' Interrogatories and Requests for Documents Regarding Fraudulent Statements.

Subject to and without waiver of its objections, Sherwin-Williams incorporates by reference its Response to Interrogatory No. 22.

Interrogatory No. 24

Identify any properties of the New York City Housing Authority, constructed prior to 1960, for which lead pigment or lead based paint was specified, purchased and/or used. State separately for each such property:

- a. Each type of lead pigment which was specified;
- b. The particular surfaces (e.g. kitchen floors, bathroom ceilings) for which each pigment or paint was specified and/or used;
- c. The years in which these pigments or paints were specified and/or used;
- d. The amount of white lead pigment or lead based paint purchased;
- e. The name of the manufacturer of the lead pigment or paint.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it attempts to improperly shift to defendants the plaintiffs' burden to come forward with proof of their claims. Sherwin-Williams further objects to this interrogatory because it is a contention interrogatory and thus exceeds the scope of permissible discovery under the Referee's Pre-Trial Order No. 12. Subject to and without waiver of its objections, Sherwin-Williams states that it is without sufficient knowledge to further respond to this interrogatory as posed. To the extent information responsive to this interrogatory may exist, it is contained in plaintiffs' records. Sherwin-Williams further states that it has found no information in its business records to indicate it sold any white lead carbonate, white lead sulfate, or lead-based paints to the New York City Housing Authority. On the present record, there is no credible evidence of the presence of white lead carbonate or white lead sulfate, or paint containing such pigments, in any New York City Housing Authority property.

Interrogatory No. 25

Identify any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments to satisfy the judgment.

RESPONSE:

Sherwin-Williams objects to this interrogatory because it is so vague and ambiguous as to be unintelligible. Moreover, this interrogatory is premature. The interrogatory is unreasonably vague as to the time period of coverage, the amount of any possible judgment, the properties at issue and the products at issue. Sherwin-Williams agrees to consider a supplemental response regarding insurance information, as required by the CPLR, for plaintiffs' claims in this case only, in response to a more clearly worded interrogatory.

RESPONSES TO DOCUMENT REQUESTS

Document Request No. 1

Produce all documents identified in your responses to any interrogatory propounded to defendant submitted herewith, and any document which relates to or was relied upon in responding to such interrogatories, or which you claim supports any response to such interrogatories.

RESPONSE:

Subject to and without waiver of its objections, Sherwin-Williams has already produced all such documents to plaintiffs.

Document Request No. 2

Produce all organizational charts, personnel directories, and company telephone books that contain the names of persons with managerial or other supervisory responsibilities with respect to defendant's sales, shipments, production, promotion of white lead and with respect to defendant's recordkeeping of its sales, shipments, production, and stocks of white lead.

RESPONSE:

Sherwin-Williams objects to this request because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of its objections, Sherwin-Williams has already produced them to plaintiffs. See, e.g., 7-SWP-5200-10.

Document Request No. 3

Produce all documents reflecting defendant's sales and shipments of white lead.

RESPONSE:

Subject to and without waiver of its objections, Sherwin-Williams has already produced all such documents to plaintiffs.

OBJECTIONS TO DISCLOSURE

Sherwin-Williams makes the following objections to plaintiffs' interrogatories and document requests. These objections are incorporated into Sherwin-Williams' responses to the interrogatories and document requests and, unless otherwise indicated, each objection applies to each interrogatory and document request and the responses provided are subject to and limited by each objection.

Objections to Definitions

The following objections to definitions apply to each discovery request in which the objectionable term is used.

1. Sherwin-Williams objects to plaintiffs' definitions to the extent they are overly broad, seek to impose undue burdens on Sherwin-Williams, and seek material that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
2. Sherwin-Williams objects to plaintiffs' definitions to the extent they call for material protected from disclosure under the attorney-client privilege and the attorney work product and trial preparation protections of CPLR 3101 or other New York authority.
3. Sherwin-Williams objects to plaintiffs' Definition Nos. 2 and 4 to the extent they seek to have Sherwin-Williams provide information regarding any party other than Sherwin-Williams. Sherwin-Williams will respond on its own behalf only based on its own business documents only. Sherwin-Williams further objects to providing information from its "associated and affiliated companies, subsidiaries, parents, holding companies, predecessors or successors" as beyond the scope of CPLR Rule 3101, Referee's Pretrial Order No. 6, and the issues in this case. Sherwin-Williams was incorporated in 1884 and therefore has no predecessors during the relevant time period. Sherwin-Williams also has no successors, although

it has produced available responsive information from companies that it acquired before this lawsuit was filed.

4. Sherwin-Williams objects to plaintiffs' definition of the term "white lead" in Definition No. 10 because it is not reasonably calculated to lead to the discovery of admissible evidence. Sherwin-Williams further objects to Definition No. 10 as overly broad, vague and ambiguous. Plaintiffs' definition of "white lead" includes products that are not relevant to this litigation. As plaintiffs themselves stated, "[t]he substances at issue in this case are white lead carbonate and lead sulfate." Pls.' Resps. to Defs.' Interrogs. of 7/8/92 at 3-4; Pls.' Resps. to Defs.' Reqs. for Produc. of 7/8/92 at 4. Plaintiffs' claims in this case are based on the production and sale of white lead carbonate, white lead sulfate and white lead in oil, and that is the basis upon which Sherwin-Williams will respond. Information concerning "lead zinc oxide" or "paint containing white lead carbonate, dry or in oil, white lead sulphate, or lead zinc oxide" is outside the scope of this litigation.

5. Sherwin-Williams objects to Definition No. 11 as overly broad, vague and ambiguous. Sherwin-Williams will respond as required by the CPLR and objects to the extent it seeks to impose greater burdens on Sherwin-Williams.

Objections to Instructions

The following objections to instructions apply to each discovery request to which the objectionable instruction pertains.

1. Sherwin-Williams objects to "period of time covered by this request" as stated in Instruction No. 4 on the basis that it is overly broad, vague and ambiguous, and bears no relationship to plaintiffs' claims. Plaintiffs have not produced any evidence that the products at issue could have been applied to any properties before 1934, the year NYCHA was created.

Sherwin-Williams' responses are based on documents created in the period from 1910 (the date Sherwin-Williams first produced white lead carbonate) until 1960.

2. Sherwin-Williams objects to plaintiffs' Instruction No. 5 to the extent it seeks information concerning another defendant.

3. Sherwin-Williams will respond as required by the CPLR and objects to plaintiffs' Instruction No. 6 to the extent it seeks to impose greater burdens on Sherwin-Williams.

GENERAL OBJECTIONS

1. Sherwin-Williams objects to plaintiffs' discovery requests as fundamentally unfair and a violation of due process because plaintiffs refuse to respond to Sherwin-Williams' discovery requests to plaintiffs (Sherwin-Williams' First and Second Interrogatories to NYCHA of 7/3/97). Sherwin-Williams further objects that plaintiffs' refusal to respond to Sherwin-Williams' discovery requests is a denial of Sherwin-Williams' right to discovery and an impediment to a fair and an efficient adjudication of this controversy.

2. Sherwin-Williams objects to plaintiffs' discovery requests on the basis that they seek detailed information regarding activities that occurred decades ago. Persons who might have had personal knowledge of these activities have died. Consequently, these discovery requests relate to circumstances that not only are largely unknown, but are likely to be unknowable. Moreover, the discovery requests are virtually unlimited by product or time and are obviously drafted without any reference to the facts in this case.

3. Sherwin-Williams is responding to these interrogatories and document requests based on documents kept by Sherwin-Williams in the course of its business. To the extent these interrogatories and document requests seek information or documents not contained

in such documents, Sherwin-Williams objects to these interrogatories and document requests as unduly burdensome.

4. Sherwin-Williams objects to plaintiffs' interrogatories and document requests because they duplicate plaintiffs' previous interrogatories and requests for documents.

5. Sherwin-Williams' responses are based only on documents maintained by Sherwin-Williams in the normal course of business. Sherwin-Williams objects to these interrogatories and document requests because they are premature in calling for expert opinion rather than fact discovery. Sherwin-Williams has not selected the experts that will testify in this case; any experts currently working with Sherwin-Williams in this case are, at present, consulting experts. Sherwin-Williams reserves the right to supplement its responses with expert opinions and facts and documents upon which the experts rely.

6. Sherwin-Williams objects to the Requests for Documents because they fail to identify the documents requested with particularity as required under the CPLR.

7. Sherwin-Williams objects to plaintiffs' discovery requests on the grounds that they are overly broad and seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, to the extent that they:

- a. Seek information related to pigment other than white lead pigment, and therefore do not relate to the type of pigment upon which Sherwin-Williams is alleged to be liable in this action;
- b. Seek information related to paint, rather than pigment, and therefore do not relate to the basis upon which Sherwin-Williams is alleged to be liable in this action;

- c. Seek information related to pigment other than pigment for interior residential use, and therefore do not relate to the basis upon which Sherwin-Williams is alleged to be liable in this action;
 - d. Seek information unrelated to lead; or
 - e. Seek information related to the production, marketing, or sale of products other than in New York City.
8. Sherwin-Williams objects to plaintiffs' interrogatories and document requests to the extent they seek information or material available to plaintiffs from public sources.
9. Sherwin-Williams objects to plaintiffs' document requests on the basis that they seek the production of documents in New York. If any documents are produced, they will be produced in Cleveland, Ohio, Pittsburgh, Pennsylvania, or another location to which Sherwin-Williams consents.
10. Sherwin-Williams objects to plaintiffs' request that Sherwin-Williams identify specific documents out of the many thousands of pages it has produced. Sherwin-Williams also objects because it is impossible, in certain cases, to reliably determine whether or not the documents from decades-old activities support or refute the stated proposition, or are irrelevant. Nevertheless, Sherwin-Williams has identified certain non-exhaustive examples of

documents that appear to provide some information responsive to plaintiffs' requests. By identifying such documents, Sherwin-Williams does not admit that they are authentic, relevant or admissible and reserves the right to object to any such document's use or introduction into evidence.

Dated: Pittsburgh, Pennsylvania
November 24, 1997

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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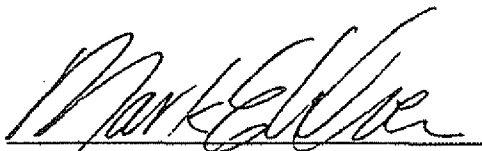
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CERTIFICATE OF SERVICE

I hereby certify that, on November 24, 1997, true and correct copies of Defendant The Sherwin-Williams Company's Responses to Plaintiffs' Second Set of Interrogatories and Request for Documents to All Defendants were served by depositing true copies enclosed in a postage-paid wrapper in an official depository under the exclusive custody of the U.S. Postal Service, addressed to the counsel on the attached list.


Mark E. Ulven

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK, THE NEW
YORK CITY HOUSING AUTHORITY, and
THE NEW YORK CITY HEALTH AND
HOSPITALS CORPORATION,

Plaintiffs,

Index No. 14365/89

-against-

IAS Part 38
Justice Freedman

LEAD INDUSTRIES ASSOCIATION,
INC., NL INDUSTRIES, INC.,
EAGLE-PICHER INDUSTRIES, INC.,
ATLANTIC RICHFIELD COMPANY, THE
SHERWIN-WILLIAMS COMPANY, SCM
CORPORATION, THE GLIDDEN
COMPANY, AMERICAN CYANAMID and
FULLER-O'BRIEN CORPORATION,

Defendants.

-----X
**SUPPLEMENTAL RESPONSES AND OBJECTIONS OF DEFENDANT
THE SHERWIN-WILLIAMS COMPANY TO INTERROGATORY NOS.
27 AND 65 OF PLAINTIFFS' FIRST
SET OF INTERROGATORIES TO ALL DEFENDANTS**

Without waiver of any of the objections set forth in Defendant The Sherwin-Williams Company's Responses to Plaintiffs' First Set of Interrogatories to All Defendants, Sherwin-Williams provides the following supplemental responses as stated in The Sherwin-Williams Company's December 14, 1995 Response to Plaintiffs' Motion to Sever and Stay the City and HHC Claims and Plaintiffs' Cross-Motion to Compel Disclosure from Sherwin-Williams. In accordance with the rulings of Justice Glen and Justice Freedman, these supplemental responses are provided for the time period 1928 through 1959:

Interrogatory No. 27

When, if ever, did defendant cease producing lead-based interior paints? When, if ever, did defendant cease producing exterior lead-based paints? When, if ever, did defendant cease producing lead-based paints for use on furniture and toys? If defendant ceased production of any such lead-based paints, why was such production ended? Was defendant's decision based on any consideration of health hazards posed by lead paint? If so, what were those considerations and when did defendant learn of them? Identify all documents used to answer this interrogatory.

Original Response No. 27

Sherwin-Williams incorporates by reference its objections to Disclosure Nos. 2, 3, 4 and 8(a) and (c). Furthermore, Sherwin-Williams objects on the ground that this interrogatory is overly broad and unduly burdensome in view of the thousands of paint formulas used by Sherwin-Williams since 1910.

Without waiver of any of its objections, Sherwin-Williams states that, based on a good faith inquiry and a reasonable search of its relevant business records, it is not known precisely when Sherwin-Williams ceased producing any interior residential paint with white lead pigments. Its relevant business records indicate that it ceased using white lead pigments in virtually all interior residential paints by at the latest the mid-1930s. Additionally, Sherwin-Williams used non-lead pigments in paint for toys by at the latest the mid-1930s. Furthermore, Sherwin-Williams participated as an alternate on the American Standards Association Z66.1 Subcommittee in the mid-1950s to prevent the use of paint

containing more than 1% lead for interior residential surfaces, including toys and furniture.

Supplemental Response to Interrogatory No. 27

Based on a good faith inquiry and a reasonable search of its relevant, available business records, Sherwin-Williams cannot identify a single specific reason why Sherwin-Williams stopped producing any particular interior or exterior paint that contained lead pigment. Based on the available information, Sherwin-Williams believes that its paint production was guided by a variety of overlapping considerations, including but not necessarily limited to availability of raw materials, cost of raw materials, availability of production facilities, anticipation of and compliance with voluntary and governmental regulatory requirements, availability of technology and market demand (both customer and consumer).

Manufacturers of ready-mixed paint, including Sherwin-Williams, went through a period of experimentation and evolution in the 1920s and 1930s, during which the use of paint pigments other than white lead carbonate increased. Sherwin-Williams is not aware that it had knowledge during this time period of any health risk posed to children from white lead pigment in paint on the surfaces of buildings, and does not believe that this period of change was spurred by any recognition of any potential toxicity to children of residential paint containing lead. Sherwin-Williams believes that the primary reason for its increased use of non-lead pigments during this time period was

the development of better and cheaper white pigments suitable for use in interior paint. Available information indicates that, by the mid-1930s, Sherwin-Williams made very little paint for interior use, if any, that contained white lead carbonate. Because exterior paints are subjected to more extreme conditions of use than interior paints, the use of non-lead pigments for exterior applications followed the development of such pigments possessing the requisite adhesion, toughness, elasticity and durability.

Sherwin-Williams has not relied upon any single document or group of documents in the preparation of this response. Sherwin-Williams is in the midst of producing documents for plaintiffs' review. In the course of that production, Sherwin-Williams will produce documents that support its response and will identify those documents for plaintiffs. Furthermore, Sherwin-Williams has considered the statements made in the Affidavit of John Heitmann dated September 13, 1991 in the case of Santiago v. The Sherwin-Williams Co., et al., No. 87-2799-T (D. Mass.), in which one of plaintiffs' counsel was counsel of record. This affidavit therefore is available to plaintiffs' counsel.

Interrogatory No. 65

Identify each present or former employee, agent, attorney or other person acting for or on behalf of defendant whose job responsibilities included lobbying various federal, state and local governmental officials on issues related to the regulation of lead paint, including but not limited to regulation governing warning labels.

Original Response No. 27

Sherwin-Williams incorporates by reference its Objection to Disclosure No. 8(f) and (h). Sherwin-Williams objects to the use of the term "lobbying" on the grounds that it is vague and ambiguous. Subject to and without waiver of its objections, Sherwin-Williams states that it has no information indicating that any particular employees of Sherwin-Williams has or had the above-referenced "job responsibilities" as their principal responsibility. Various employees of Sherwin-Williams, however, have occasionally been asked to speak to particular issues. Sherwin-Williams incorporates by reference its response to Interrogatory No. 47.

Supplemental Response to Interrogatory No. 27

Sherwin-William has not identified any responsive "lobbying" conducted by Sherwin-Williams or at the request or approval of Sherwin-Williams for the time period covered by this supplemental response (from 1928 through 1959). Sherwin-Williams therefore is not presently able to identify any person requested by this interrogatory. Sherwin-Williams reserves the right to

supplement or amend this response based on information that becomes available in the further course of this action.

Dated: Pittsburgh, Pennsylvania
January 31, 1996

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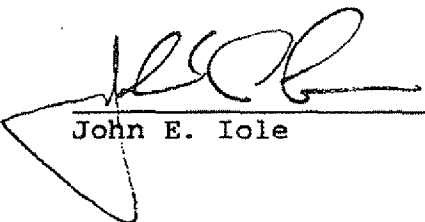
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Attorneys for Defendant
The Sherwin-Williams Company

CERTIFICATE OF SERVICE

I hereby certify that, on January 31, 1996, true and correct copies of Defendant The Sherwin-Williams Company's Supplemental Responses to Interrogatory Nos. 27 and 65 of Plaintiffs' First Set of Interrogatories to All Defendants were served by depositing true copies enclosed in a postage-paid wrapper in an official depository under the exclusive custody of the U.S. Postal Service, addressed to the counsel on the attached list.



John E. Iole

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THE CITY OF NEW YORK, THE NEW
YORK CITY HOUSING AUTHORITY, and
THE NEW YORK CITY HEALTH AND
HOSPITALS CORPORATION,

Plaintiffs,

Index No. 14365/89

-against-

IAS Part 38
Justice Freedman

LEAD INDUSTRIES ASSOCIATION,
INC., NL INDUSTRIES, INC.,
EAGLE-PICHER INDUSTRIES, INC.,
ATLANTIC RICHFIELD COMPANY, THE
SHERWIN-WILLIAMS COMPANY, SCM
CORPORATION, THE GLIDDEN
COMPANY, AMERICAN CYANAMID and
FULLER-O'BRIEN CORPORATION,

Defendants.

-----X
RESPONSES AND OBJECTIONS OF DEFENDANT
THE SHERWIN-WILLIAMS COMPANY TO PLAINTIFFS'
FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
WITH RESPECT TO DEFENDANTS' MAINTENANCE OF DOCUMENTS

Defendant The Sherwin-Williams Company responds to
plaintiffs' first set of interrogatories and requests for
production of documents with respect to defendants' maintenance
of documents pursuant to Rules 3101 and 3133 of the New York
Civil Practice Law and Rules ("CPLR"), and the Court's discovery
rulings dated October 15, 1993 and December 19, 1995. These
responses are subject to and limited by the Court's rulings,
which limit present disclosure to certain statements made
regarding white lead pigment between 1929 and 1960, and regarding

information known by defendants before 1960 concerning health hazards of lead paint. These responses further are subject to, limited by and without waiver of Sherwin-Williams' Objections to Disclosure, which are set forth following its responses and are incorporated into each of its responses.

PRELIMINARY STATEMENT

Plaintiffs' requests are extremely broad in subject matter, cover a vast expanse of time, and seek information regarding documents from long-defunct activities. Notwithstanding these circumstances, and subject to its objections, Sherwin-Williams has attempted to provide responses based on the best of its information, belief and, where applicable, knowledge reasonably available at the time of these responses. If Sherwin-Williams obtains additional information responsive to plaintiffs' discovery, Sherwin-Williams reserves the right to supplement or amend these responses pursuant to CPLR 3101(h) or other authority.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 1

If lead documents were ever archived, state when the documents were archived, identify who archived the documents, identify where the archived documents were stored and identify any indices, catalogues or other descriptions of these documents.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Subject to and without waiver of its objections, Sherwin-Williams states that, outside of litigation or the threat of litigation, it is not aware of any

search for or transfer, collection, maintenance or organization of any documents on the basis that such documents contained information relating to lead pigment or lead paint. Before the filing of lawsuits such as Santiago v. The Sherwin-Williams Co., et al., No. 87-2799-T (D. Mass.), in which one of plaintiffs' counsel was counsel of record, Sherwin-Williams is not aware of any business purpose for Sherwin-Williams to have maintained, searched for or collected such documents. In response to discovery requests in lawsuits such as Santiago v. The Sherwin-Williams Co., et al., No. 87-2799-T (D. Mass.), counsel for Sherwin-Williams undertook a search and review of company files and records to locate documents potentially relevant to actual or anticipated litigation and has undertaken additional subsequent searches. Accordingly, to the best of Sherwin-Williams' information and belief, any search, transfer, collection, maintenance or organization of documents relating to lead pigment or lead paint was conducted in response to actual or anticipated litigation and was performed by or at the specific direction of Sherwin-Williams' inside or outside legal counsel. See also Response to Interrogatory No. 7.

By way of further answer, in response to "Plaintiffs' First Set of Interrogatories to All Defendants" and "Plaintiffs' First Set of Requests for Documents to All Defendants" served in this action in 1992 ("Plaintiffs' 1992 Discovery Requests"), counsel for Sherwin-Williams undertook a review for documents potentially responsive to Plaintiffs' 1992 Discovery Requests. Although production of documents in response to Plaintiffs' 1992

Discovery Requests was partially stayed by the Court in its October 15, 1993 ruling, Sherwin-Williams now has offered to produce to plaintiffs the documents that it agreed to produce in 1992, and plaintiffs have accepted this offer.

Interrogatory No. 2

If lead documents were ever destroyed, identify the documents destroyed, the date of their destruction, identify the persons involved in the document destruction, and identify any documents which discuss or refer to the document destruction.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Subject to and without waiver of its objections, Sherwin-Williams states that it is impossible to determine precisely what documents might have been lost or destroyed in the more than 100 years of Sherwin-Williams' existence. Following the filing of lawsuits such as Santiago v. The Sherwin-Williams Co., et al., No. 87-2799-T (D. Mass.), Sherwin-Williams and its inside and outside legal counsel initiated measures to preserve documents or information that could be potentially relevant to the issues in litigation. Accordingly, Sherwin-Williams does not believe that any such documents were intentionally destroyed after that date, and is not presently aware of any unintentional destruction of such documents after that date. Furthermore, Sherwin-Williams has had a formal document retention policy since 1978. Sherwin-Williams already has responded to plaintiffs' requests for disclosure on this topic and incorporates by reference its response to plaintiffs' Request for Production No. 15. Sherwin-Williams presently is not able to otherwise respond to this interrogatory.

Interrogatory No. 3

If lead documents were ever transferred to an entity other than you or your predecessor[s], identify the documents transferred, the date of their transfer, identify the persons involved in the document transfer, and identify any documents which discuss or refer to the document transfer.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Subject to and without waiver of its objections, Sherwin-Williams states that, outside of anticipated or pending litigation, it is not aware of any transfer of documents such as that referred to in this request. Any transfer as part of actual or anticipated litigation was conducted by or at the specific direction of Sherwin-Williams' inside and outside legal counsel. See also Response to Interrogatory No. 7.

Interrogatory No. 4

Identify where each document requested in plaintiffs' First Set of Interrogatories and First Set of Requests for Documents and in Plaintiffs' Interrogatories and Requests for Documents Regarding Fraudulent Statements was located prior to the commencement of Santiago v. Sherwin-Williams Co., No. 87-2799-T (D. Mass). For each document requested, please state:

- (i) The title or name of the file;
- (ii) The name of the division, department, unit, office or other entity that stored each file;
- (iii) The name(s) of the agents, employees, officials or other individuals whose records contained each file.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Sherwin-Williams further objects because this request is unduly burdensome and not

reasonably calculated to lead to the discovery of admissible evidence in seeking to have Sherwin-Williams provide the specific information sought by this request for the thousands of pages of documents encompassed. Subject to and without waiver of its objections, Sherwin-Williams states that, if an employee or division is listed as the author or source of a document, it is reasonable to assume, absent contrary indications, that such document was in the files of that employee or division at one time. Furthermore, if a document bears a stamp indicating receipt by an employee or division, it is reasonable to assume, absent contrary indications, that such document was in the files of that employee or division at one time. Subject to its objections, Sherwin-Williams will attempt to provide additional information, if available, regarding specific, relevant documents identified by plaintiffs.

Interrogatory No. 5

If any collection of lead documents was reviewed, indexed, catalogued, or otherwise described, identify such index, catalogue or description.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Sherwin-Williams further objects to the phrase "collection of lead documents" as vague and ambiguous. Subject to and without waiver of its objections, Sherwin-Williams states that, outside of litigation, it is not aware of any review, indexing, cataloguing or description undertaken of any "collection of lead documents." Any review of documents conducted as part of actual or anticipated litigation

was conducted by or at the specific direction of Sherwin-Williams' inside and outside legal counsel. See also Response to Interrogatory No. 7.

Interrogatory No. 6

Identify each person who ever archived, indexed, catalogued or described any collection of lead documents.

RESPONSE:

Sherwin-Williams incorporates its objections and response to Interrogatory No. 5 as though they were set forth in full.

Interrogatory No. 7

If you claim that any of the archiving, transferring, destruction, indexing, cataloguing, or describing of the lead documents discussed above are privileged activities or generated privileged documents, describe the act or the document and your basis for claiming privilege.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Sherwin-Williams further objects to the phrase "documents discussed above" as vague and ambiguous. Subject to and without waiver of its objections, Sherwin-Williams states that any archiving, transferring, indexing, cataloguing or describing of documents containing information relating to lead pigment or lead paint was performed by or at the specific direction of Sherwin-Williams' inside or outside legal counsel. This work was performed as part of the defense of asserted or anticipated claims made in this and other litigation relating to the former production or sale of lead pigment or lead-containing paint. The results of this work would reveal the thoughts, mental impressions, conclusions and opinions

of Sherwin-Williams' legal counsel and constitute trial preparation material. As stated in response to Interrogatory No. 2, Sherwin-Williams does not believe that any documents referred to by this interrogatory were intentionally destroyed following the filing of lawsuits such as Santiago v. The Sherwin-Williams Co., et al., No. 87-2799-T (D. Mass.), and is not presently aware of the unintentional destruction of any such documents after that time.

Interrogatory No. 8

Identify the individuals who are most knowledgeable about lead documents previously or presently in your possession, custody or control and state the knowledge of each such individual.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-3. Subject to and without waiver of its objections, Sherwin-Williams states that the persons called for by this interrogatory are employed by Sherwin-Williams' law department or Sherwin-Williams' outside legal counsel and their knowledge and work product is protected by the attorney work product privilege and the trial preparation privilege. See also Response to Interrogatory No. 7.

RESPONSES TO DOCUMENT REQUESTS

Document Request No. 1

Produce all documents identified in the above interrogatories.

RESPONSE:

Sherwin-Williams incorporates by reference its Objections to Disclosure Nos. 1-4. Sherwin-Williams further objects that no documents are identified by the foregoing interrogatories. Subject to and without waiver of its objections, Sherwin-Williams states that any documents referred to by the foregoing interrogatories were prepared by Sherwin-Williams' law department or its outside legal counsel for the defense of asserted or anticipated legal claims and therefore are protected by the attorney work product privilege and the trial preparation privilege.

Document Request No. 2

Produce all other indices, catalogues and other documents that describe defendants' holdings of lead documents.

RESPONSE:

Sherwin-Williams objects to the phrase "holdings of lead documents" on the basis that it is vague and ambiguous. Sherwin-Williams further incorporates its objections and response to Document Request No. 1 as though they were set forth in full.

OBJECTIONS TO DISCLOSURE

In the interest of clarity and brevity, Sherwin-Williams has set forth the following objections to plaintiffs' interrogatories and document requests. The following objections are incorporated into Sherwin-Williams' responses to the interrogatories and document requests and, unless otherwise indicated, each objection applies to each interrogatory and

document request and the responses provided are subject to and limited by each objection.

Objections to Definitions

The following objections to definitions apply to each discovery request in which the objectionable term is used.

1. Sherwin-Williams objects to the term "archive" on the basis that it is vague and overbroad.

2. Sherwin-Williams objects to plaintiffs' Definition No. 2 to the extent it seeks to have Sherwin-Williams provide information regarding any party other than Sherwin-Williams. Sherwin-Williams will respond on its own behalf only. Sherwin-Williams further objects to providing information from its "associated or affiliated companies, subsidiaries, parents, holding companies, consultants, attorneys and persons presently or formerly acting on their behalf, or any of each of their predecessors or successors in interest" as beyond the scope of CPLR Rule 3101 and the issues in this case. Sherwin-Williams further objects to these instructions on the basis that they seek to invade the attorney work product and attorney trial preparation protections provided by CPLR 3101 or other New York authority.

3-6. Sherwin-Williams will respond as required by the CPLR and objects to plaintiffs' Definition Nos. 3-6 to the extent they seek to impose greater burdens on Sherwin-Williams.

7. Sherwin-Williams objects to the definition of "lead document" in Definition No. 7 on the basis that it is overbroad, seeks to impose an undue burden on Sherwin-Williams,

and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The definition purports to include each and every document of every type, whenever and wherever created, regarding any type of lead pigment or lead paint, whether or not it is at issue in this case. Sherwin-Williams further objects to the phrase "pigments that could substitute for lead" because it is vague and ambiguous.

8-10. Sherwin-Williams objects to plaintiffs' definitions of the terms "lead paint," "paints containing lead," "lead-based paint," "white lead pigment" and "paint" as overly broad, vague and ambiguous and because they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs' claims in this case are based on the production and sale of white lead pigment only (white lead carbonate, white lead sulfate and white lead in oil), and that is the basis upon which Sherwin-Williams has responded.

11-14. Sherwin-Williams' will respond as required by the CPLR and objects to plaintiffs' Definition Nos. 11-14 to the extent they seek to impose greater burdens on Sherwin-Williams.

Objections to Instructions

The following objections to instructions apply to each discovery request to which the objectionable instruction pertains.

A. Sherwin-Williams objects to plaintiffs' stated "relevant time period" on the basis that it is overbroad and

bears no relationship to the claims in this case. Sherwin-Williams will respond for underlying documents created in the period from 1910 (the date Sherwin-Williams first produced white lead pigment) until 1960, the time limitations set by the Court in its October 15, 1993 and December 19, 1995 rulings.

B-C. Sherwin-Williams' will respond as required by the CPLR and objects to plaintiffs' Instructions B and C to the extent they seek to impose greater burdens on Sherwin-Williams.

D-F. Sherwin-Williams objects to plaintiffs' Instructions D and F to the extent they seek to have Sherwin-Williams provide information under the control of any person or party other than Sherwin-Williams. Sherwin-Williams further objects to these instructions on the basis that they seek to invade the attorney work product and attorney trial preparation protection provided by CPLR 3101 or other New York authority.

E, G-I. Sherwin-Williams' will respond as required by the CPLR and objects to plaintiffs' Instructions E, G, H and I to the extent they seek to impose greater burdens on Sherwin-Williams. Sherwin-Williams further objects to these Instructions on the basis that they are unduly burdensome.

GENERAL OBJECTIONS TO DISCLOSURE

1. Sherwin-Williams objects to plaintiffs' discovery requests on the basis that they evidently seek detailed information regarding underlying documents that are decades old and relate to circumstances that not only are largely unknown, but are likely to be unknowable. Moreover, the discovery requests are virtually unlimited by product, time or place and

are obviously drafted without any reference to the facts in this case. Furthermore, the discovery requests are unduly burdensome in that they seek information regarding a search for documents performed in 1992 in response to Plaintiffs' 1992 Discovery Requests, although actual production was partially stayed by the Court's October 15, 1993 ruling. Sherwin-Williams now has offered to produce to plaintiffs the documents it previously agreed to produce in response to Plaintiffs' 1992 Discovery Requests, and plaintiffs have accepted that offer. Therefore, plaintiffs' present interrogatories and requests for production of documents regarding defendants' maintenance of records are duplicative, irrelevant, unduly burdensome and threaten to prevent the economical and speedy resolution of this action.

2. Sherwin-Williams objects to plaintiffs' discovery requests because they request information protected from disclosure by the attorney-client privilege, the attorney work product privilege, the trial preparation privilege and the joint defense privilege provided for in CPLR 3101 and other authority. Furthermore, Sherwin-Williams objects to providing more detailed information regarding the matters sought to be produced by plaintiffs' discovery requests because to do so would risk revealing the thoughts, opinions, impressions and conclusions of counsel, and also would risk revealing trial preparation material.

3. Sherwin-Williams objects to plaintiffs' discovery requests on the grounds that they are overly broad and seek information that is neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence, to the extent that they:

- (a) Seek information related to pigment other than pigment containing white lead, and therefore do not relate to the type of pigment upon which Sherwin-Williams is alleged to be liable in this action as a former producer or seller of white lead pigment;
- (b) Seek information related to paint, rather than pigment, and therefore do not relate to the basis upon which Sherwin-Williams is alleged to be liable in this action as a former producer or seller of white lead pigment;
- (c) Seek information related to pigment other than pigment for interior residential use, and therefore do not relate to the basis upon which Sherwin-Williams is alleged to be liable in this action;
- (d) Seek information unrelated to lead; and
- (e) Seek information related to the production, marketing, or sale of lead pigments other than in New York City.

4. Sherwin-Williams objects to plaintiffs' document requests on the basis that they seek the production of documents

in New York. If any documents are produced, they will be produced in Cleveland, Ohio or Pittsburgh, Pennsylvania.

Dated: Pittsburgh, Pennsylvania
January 16, 1996

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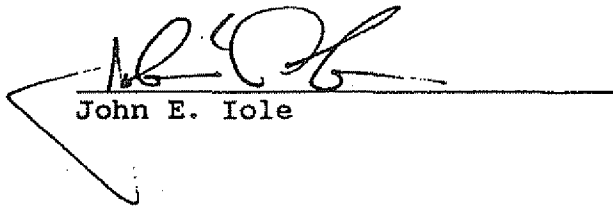
and

500 Grant Street, 31st Floor
Pittsburgh, PA 15219

Attorneys for Defendant
The Sherwin-Williams Company

CERTIFICATE OF SERVICE

I hereby certify that, on January 16, 1996, true and correct copies of Defendant The Sherwin-Williams Company's Responses to Plaintiffs' First Set of Interrogatories and Request for Production of Documents with Respect to Defendants' Maintenance of Documents were served by depositing true copies enclosed in a postage-paid wrapper in an official depository under the exclusive custody of the U.S. Postal Service, addressed to the counsel on the attached list.



John E. Iole

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
Index No. 14365/89

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