

CAUSE NO. 01-454-D

SEP 30 2002

LOUIS BARLETTA AND
MARY JANE BARLETTA,

Plaintiffs,

vs.

AMERICAN CYANAMID, *et al.*,

Defendants.

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IN THE DISTRICT COURT

KLEBERG COUNTY, TEXAS

105TH JUDICIAL DISTRICT

**CRANE CO.'S SUPPLEMENTAL ANSWERS TO PLAINTIFFS'
MASTER INTERROGATORIES AND REQUESTS FOR
PRODUCTION PROPOUNDED TO DEFENDANT**

TO: PLAINTIFFS, by and through their attorneys of record, Scott M. Hendler of The Hendler Law Firm, P.C., 816 Congress Avenue, Suite 1100, Austin, Texas 78701

Defendant Crane Co. hereby serves its Answers to Plaintiffs' Master Interrogatories and Requests for Production to Defendant ("Discovery Requests").

PRELIMINARY STATEMENT/OBJECTIONS/RESERVATION OF RIGHTS

A. The following responses are based upon the information that is presently known and reasonably available to Crane Co. Crane Co. believes that these responses are accurate as of the date made. However, many of the matters inquired about in the Discovery Requests took place decades ago. Due to the passage of time, information may be incomplete or no longer available. Nevertheless, Crane Co. has endeavored to investigate all relevant facts and circumstances. The following answers are based upon its investigation. Crane Co. cannot, however, exclude the possibility that its continued investigation may reveal more complete information. Crane Co.'s investigation into the matters inquired into in the Discovery Requests continues. The investigation is dependent upon locating knowledgeable individuals and relevant documents and information on

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PI-901266 v2

**PLAINTIFF'S EXHIBIT
WK CC 5063**

an ongoing basis. No finite completion date can be placed upon those efforts. Crane Co. has made a reasonable effort to answer the Discovery Requests to the best of its present knowledge, information and belief.

B. Crane Co. objects to the Discovery Requests to the extent they seek information and/or documents that are protected by any privilege or protection, including but not limited to the attorney-client, joint-defense, and/or the work product privileges. Crane Co. and its counsel hereby assert all applicable privileges and protections with respect to such information and/or documents. To the extent the Discovery Requests seek information or documents not presently known to or readily ascertainable by Crane Co., Crane Co. reserves all rights to object to the subsequent discovery on the aforementioned basis or any other basis or bases. Crane Co. and its counsel hereby assert and maintain all applicable privileges and protections with respect to any information and/or documents that may be subsequently discovered in accordance with these responses.

C. Crane Co. objects to the Discovery Requests to the extent they seek production of any information constituting a trade secret, confidential financial data that is not contained in published financial statements or other confidential research, development or commercial information.

D. Crane Co. objects to the Discovery Requests to the extent they are unduly burdensome and overbroad or seek information that is not relevant to this lawsuit and are not reasonably calculated to lead to the discovery of admissible evidence. Much of the information requested may be located in documents Crane Co. is willing to make available to plaintiffs' counsel under the parameters set forth herein. The burden of obtaining responsive information from those documents is the same for plaintiffs as it is for Crane Co.

E. Crane Co. objects to the use of the phrase "predecessor corporation," "predecessors," "successor corporation," or "successors" as being vague, ambiguous, argumentative and/or seeking a legal conclusion. Unless specifically noted, Crane Co.'s answers to the Discovery Requests are limited to Crane Co., the entity upon whom the Discovery Requests were served.

F. Crane Co. objects to the Discovery Requests to the extent they seek medical records or other privileged and confidential personnel information. To the extent plaintiffs, through the Discovery Requests, seek medical records or other privileged and confidential personnel information, Crane Co. will not provide such information absent an appropriate waiver of the applicable privilege by the appropriate individual(s).

G. Crane Co. does not concede that any of its answers to the Discovery Requests are or will be admissible evidence at a trial of this action. Crane Co. does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answers at trial.

H. Crane Co. objects to the definitions contained in the Discovery Requests to the extent they render the Discovery Requests vague, overbroad, and unduly burdensome. In responding to the Discovery Requests, Crane Co. will use the commonly understood, everyday meanings of the terms used. The breadth and volume of the definitions plaintiffs seek to propound would complicate tremendously the task of responding to the Discovery Requests.

I. Crane Co.'s responses to the Discovery Requests are based upon the documents and information that are known and reasonably available to it and its counsel. Crane Co. cannot exclude the possibility that other documents exist that may provide additional or more complete information. Crane Co. maintains documents in document repositories that may contain relevant information. Crane Co. has not reviewed all documents located in the repositories, because the

expense involved with such an effort would be prohibitive and unduly burdensome. Consequently, Crane Co. cannot certify that the documents contained in the repositories do not contain information responsive to the Discovery Requests. The documents located at the repositories are not organized, and Crane Co. is not able to ascertain whether any of those documents contain information responsive to the Discovery Requests. The repositories contain numerous documents that are not responsive to the Discovery Requests or relevant to this lawsuit. The repositories may also contain documents that are protected by the attorney-client, work product, and/or other applicable privileges or protections. Should plaintiffs wish to review the documents located at any of the repositories, Crane Co. will make certain documents available to plaintiffs, if plaintiffs agree in writing that (i) Crane Co. has not waived any objections it may have with respect to the discoverability of those documents on any ground and (ii) Crane Co. may conduct a post-designation review to remove privileged and irrelevant documents from any collection of documents that may be copied for production to plaintiffs, even if plaintiffs had specifically designated the privileged or irrelevant document for copying. All objections to the discovery of said documents and/or information are expressly reserved.

ANSWERS TO INTERROGATORIES

The foregoing Preliminary Statement/Objections/Reservation of Rights ("Preliminary Statement") is incorporated into Crane Co.'s answer to each of the following interrogatories, as if set forth fully therein.

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER: Crane Co.'s answers to these Discovery Requests were prepared by Crane Co.'s counsel and are based upon counsel's review of numerous documents and historic interviews with past and present employees. Among the employees who provided information contained in these responses is William N. McLean, a consultant presently employed by Crane Co., who previously served as Crane Co.'s Director of Engineering. Mr. McLean can be contacted through Crane Co.'s counsel.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Crane Co. is a corporation that was originally incorporated in Illinois in or about 1855. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters is located at 100 First Stamford Place, Stamford, Connecticut. The entity authorized to accept service of process in the state of Texas is CT Corporation, 1601 Elm Street, Dallas, Texas 75201.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Cameron County asbestos litigation.

ANSWER: To the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory because it is overly broad, unduly burdensome, and seeks information neither relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence.

Crane Co.'s response to this interrogatory shall not be construed as an admission that Crane Co. was involved in any activity with respect to asbestos-containing products that are relevant in any way to this lawsuit.

Subject to the foregoing, Crane Co. was not a manufacturer of any asbestos-containing product, as that term is defined and as it is commonly used in asbestos litigation. Crane Co. is and has been a manufacturer of certain types of industrial equipment. Crane Co.'s principal line of industrial equipment throughout the time period requested in this interrogatory was industrial valves. Industrial valves manufactured by Crane Co. were made of steel, bronze, and other metals; the valves themselves were not composed of asbestos. Many of those valves bore the name "Crane," marked directly on the valve. Certain of the valves had enclosed within their metal structure asbestos containing gaskets, packing, or discs. Crane Co. did not manufacture the asbestos-containing components that may have been encapsulated within the valves, but purchased them from other companies. Any components that may have been enclosed within the metal structure of Crane Co. valves did not emit friable or respirable asbestos fibers while enclosed within that structure. Any asbestos-containing components were completely encapsulated within the metal structure of the valves and/or valve fittings. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component, itself, by a rubber-like compound.

Crane Co. acquired around and subsequent to 1961 the assets of several industrial pump companies that became divisions of Crane Co. The acquired assets included the Deming, Chempump, Burks, Barnes, Sellers, and Weinman product lines. The Deming line was acquired in 1961. The Chempump line was acquired in 1965. The Weinman line was acquired by Burks Pumps, Inc. (n/k/a) Crane Pumps & Systems, Inc., in 1991. Crane Co. acquired Burks Pumps, Inc.

in 1993. Subsequent to the Deming and Chempump acquisitions, Crane Co. manufactured industrial pumps that may have incorporated within their metal structure an encapsulated asbestos-containing gasket and/or asbestos-containing packing. Crane Co. did not, however, manufacture the asbestos-containing components, such as gaskets or packing, contained in the industrial pumps. It purchased those components from other companies. Any components that may have contained asbestos were enclosed within the metal structure of Crane Co. industrial pumps and did not emit friable or respirable asbestos fibers while enclosed within that structure. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. manufactured boilers in the late 1800s, a practice which it appears to have discontinued prior to 1900. Crane Co. resumed manufacturing boilers in or about 1931, suspended those operations during World War II, and discontinued that practice prior to 1958. At least some of the boilers Crane manufactured through, at least, the early 1940s, contained asbestos insulation. For a brief period of time after it ceased manufacturing boilers, Crane Co. sold boilers that were manufactured, at least in part, by another company. In or about the 1960s, Crane Co. purchased the assets of two boiler companies, which it resold a few years later. By agreement dated December 22, 1959, Crane Co. acquired certain assets of the National-U.S. Radiator Corporation, and it acquired assets of the Thatcher Furnace Company in 1964. Crane Co. began selling the National-U.S. assets in 1964, it sold the Thatcher assets in 1968, and it sold its remaining boiler manufacturing assets in approximately 1972. To the best of Crane Co.'s knowledge, however, the boilers, water heaters, and furnaces that Crane Co. manufactured with those acquired assets contained fiberglass, not asbestos, insulation. After it sold those assets, Crane Co. may have sold

boilers, water heaters, and furnaces that it purchased from other entities. It is believed, however, that those items contained fiberglass, not asbestos, insulation.

For a period of time believed to be less than two years during the early 1960's, Crane Co., through its division Crane-Midwest Piping, was involved with the erection of piping systems in limited geographic areas. In connection with that erection business, Crane Co. is presently aware of one project to which Crane Co. sent flat gaskets that, most likely, contained some asbestos as part of their chemical and physical composition.

Crane Co., through a division, sold industrial water treatment systems, including deaerators, water conditioners, multi-port steam relief valves, drainers, sample coolers, and condensate boosters. Those products were composed primarily of metal; they were not composed of asbestos. Depending on the application for which it was to be used, some of this equipment incorporated internal components, primarily cloth gaskets, manufactured by others, that may have contained some asbestos as part of their chemical composition. Those components were enclosed within the equipment and were not exposed during installation or normal use of the product. Prior to the mid 1980's, Crane Co. may have sold replacement gaskets for use in the industrial water treatment systems. To the best of Crane Co.'s knowledge, Crane Co. did not manufacture any of the internal components, but purchased them from other companies.

Crane Co. also offered for sale certain products manufactured by other companies. A small quantity of those products may have contained asbestos. Crane Co. offered for sale gaskets, packing, and discs manufactured by other companies that may have contained asbestos. Material called Cranite was manufactured exclusively for resale by Crane Co., during the relevant time period through what appears to be the early-to-mid 1970's, but perhaps extending to the early 1980's. The finished "Cranite" products had the name "Cranite" stamped directly upon them. Any

asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of any friable asbestos fibers.

Crane Co.'s investigation of its activities regarding asbestos-containing products continues. That investigation is dependent upon locating knowledgeable individuals and/or information on an ongoing basis. No finite completion date can be placed upon those ongoing efforts. Crane Co. has made a reasonable effort to answer these Discovery Requests. See also Preliminary Statement, Section I.

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER: See Answer to Interrogatory No. 4. See also Preliminary Statement, Section I.

Subject to and without waiving any of the foregoing objections, based upon the documents available to Crane Co., during the times relevant to this lawsuit, Crane Co. sold asbestos cement pipe from its wholesale supply branches that, then, operated as "Crane Supply Company," a division of Crane Co., at the following locations:

Albuquerque, New Mexico
Atlanta, Georgia
Oklahoma City, Oklahoma
Provo, Utah
Sacramento, California
Salinas, California
San Francisco, California

At later dates, Crane Co. may have sold this product or a similar product from other locations. Crane Co. has no specific records indicating the locations, if any, from which it sold asbestos-containing cement in the 1950s. Nevertheless, Richard Toft, a former employee at Crane Co.'s Trenton, New Jersey, branch has indicated that neither of those products were sold from the Trenton, New Jersey, branch during the time frame relevant to this lawsuit.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.
- C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.
- F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefore.
- G. The date asbestos was removed from such products, if ever, and the reasons therefore.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each asbestos-containing product.

ANSWER: In addition to the objections stated thus far, Crane Co. specifically objects to this Interrogatory, because (i) it is overly broad and seeks information neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence, (ii) it is not in any way limited to the alleged exposure of the plaintiff in this action, and (iii) it is unduly burdensome, because the multitude of different types of industrial equipment Crane Co. produced makes it impossible to answer.

Subject to the foregoing, see Crane Co.'s Response to Interrogatory No. 4, and Section I of the Preliminary Statement. By way of further answer, Crane Co. states that it placed on the market industrial valves that may have contained asbestos-containing materials within their metal structure as early as 1855. Asbestos was removed as a component from Crane Co.'s industrial valves in the mid-1980's, with the exception of one specific type of valve designed for petroleum industry applications, which incorporated an asbestos component until the late 1980's or early 1990's. In all cases, asbestos was eliminated as a component of Crane Co. products because of decreased consumer demand for products that incorporated asbestos and/or Crane Co.'s inability to obtain asbestos containing components. Except for Cranite "sheet packing", Crane Co. cannot state the type or amount of asbestos that may have been a component of any of its products, because, *inter alia*, others manufactured the asbestos-containing components. Cranite "sheet packing" was comprised of 75%-85% chrysotile asbestos, the balance consisting of a natural rubber binder and inert fillers. Cranite "sheet packing" was sold in sheet and pre-cut gasket form. Crane Co. sold Cranite sheet packing from approximately 1920 until, to the best of its belief, 1972. To the best of Crane Co.'s knowledge, the product was never manufactured without asbestos.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory, because it is unduly burdensome and overbroad. To its knowledge, Crane Co. presently possesses

drawings and technical specification data relating to various items of industrial equipment. Crane Co. further possesses technical specifications relating to Cranite "sheet packing". See also

Preliminary Statement, Section I.

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.
- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

ANSWER: In addition to the objections stated thus far, Crane has no present knowledge that it or anyone acting on its behalf ever conducted tests to determine the potential health hazards associated with asbestos. See also Preliminary Statement, Section I.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overbroad and seeks information that is neither relevant to the subject matter of this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any "testing," as Crane Co. understands that

term, involving the industrial use of Crane Co. products or Cranite. See Preliminary Statement, Section I.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: To the best of Crane Co.'s knowledge, no. See Answer to Interrogatory Nos. 4 and 8 and Preliminary Statement, Section I.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the dates of such tests.
- B. The name, address, and job title of each person who conducted those tests.
- C. The results of those tests.
- D. Whether, as a result of the tests, any products were removed from the market.
- E. The names of all products removed from the market as a result of these tests.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this request to the extent it implies that any Crane Co. product posed a health hazard when used as intended. See Answer to Interrogatory No. 8, Preliminary Statement, Section I.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

- A. The name of each product.
- B. A description of each document and how it relates to each product.
- C. The name, address, and job title of each person who currently has possession of each document; and where it is presently located.

ANSWER: See response and objections to interrogatory No. 56.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 10 or 13? If the answer is affirmative, state:

- A. The names of the products changed or modified.
- B. The name, address, and job title of each person responsible for having made a change or modification.
- C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER: See response and objections to Interrogatory No. 10.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.
- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.

- F. The name, address, and job title of each person responsible for having drafted or issued the warning.
- G. The current location of any such printed material and the custodian thereof.
- H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory as being ambiguous. Crane Co. further objects to this Interrogatory to the extent it implies that a possibility of injury resulted from the intended use of any Crane Co. products. Crane Co. objects to Interrogatory No. 14 as being overly broad and unduly burdensome. Crane Co. did not manufacture any asbestos-containing products, as it understands the term "asbestos containing products" and as that term is commonly used in asbestos litigation. To the best of Crane Co.'s present knowledge, the only "warning" associated with any Crane Co. product regarding asbestos was a notification which first appeared in the mid-1980s, attached to certain industrial valves that informed the user that asbestos-containing materials were contained within the valve. That warning read as follows: "CAUTION - Contains Asbestos Packing or Gasket". See also response and objections to Interrogatory No. 4 and Preliminary Statement, Section I.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Texas State Courts is or are claiming of has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.
- B. The date of notice of each claim.
- C. A description of the claim.
- D. The type of injuries allegedly sustained.
- E. The name and address of each attorney who represents each individual making a claim.

F. The style and court number of each claim.

G. The disposition of each claim that has been settled or taken to judgment.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 15, because it is overly broad and unduly burdensome and seeks information neither relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, to the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 16 to the extent it assumes Crane Co. manufactured asbestos-containing products, which is denied. Crane Co. was not a manufacturer of any asbestos-containing product as that term is defined and as it is commonly used in asbestos litigation. The products referred in Crane Co.'s response to Interrogatory No. 4 may have been sold or distributed by entities other than Crane Co. Crane Co. is not presently aware of the specific identity of any of those entities. See Preliminary Statement, Section I.

INTERROGATORY NO. 17:

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, Texas and Virginia? If so, state:

- A. The name and address of each such distributor or sales representatives.
- B. The years in which such company or person distributed, marketed, or sold your products.
- C. What products were distributed, marketed, or sold and in what years.

ANSWER: Crane Co. believes its products may have been sold in the states of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, Texas, and Virginia.

See

Preliminary Statement, Section I. See also Response to Interrogatory No. 5, supra.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including; but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: To the best of Crane Co.'s knowledge, it is presently unaware of any person whose identity would be responsive to this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.
- D. The name, job title, and address of each person who currently has possession of each publication and--its present location.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory because it is overbroad and because it seeks irrelevant information and is not likely to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any documents that are specifically responsive to this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each such association or organization.
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date.
 - 2. The current location of such publications.
 - 3. The custodian of such publications.
 - 4. The method or manner in which such publications are maintained.

ANSWER: Crane Co. is not aware of its membership in any organization that disseminated information of the type requested in this interrogatory. To the extent relevant, to the best of its knowledge, Crane Co. was a member of the National Safety Council (approximately 1975-1996) and the Valve Manufacturers Association (approximately 1938 to present). See Preliminary Statement, Section I.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 21, because it is overly broad, unduly burdensome and seeks irrelevant information and is not reasonably calculated to lead to the discovery of admissible evidence

because, *inter alia*, it is not in any way limited to the alleged exposure of the plaintiff in this action. Subject to the foregoing, to the best of its present knowledge and according to its historical annual reports, without limitation, Crane Co. assembled and/or manufactured valves at plants located in Chicago, Illinois; Chattanooga, Tennessee; Indian Orchard, Massachusetts; Jonesboro, Arkansas; and Washington, Iowa; pumps at plants located in Rogers, Arkansas; Salem, Ohio; and Warrington, Pennsylvania; deaerators at a plant located in King of Prussia, Pennsylvania; and boilers at plants located in Oswego, New York; Johnstown, Pennsylvania; and Garwood, New Jersey. Crane Co. also manufactured other products at other locations. Crane Co. did not manufacture any of the asbestos-containing components that may have been included in the pumps, valves, deaerators, or boilers. Accordingly, those components would not have been manufactured at any of the locations listed above. Crane Co. did not manufacture or prepare asbestos-containing pipe or asbestos-containing cement. Therefore, it has no information concerning those products that is responsive to this interrogatory. See response and objections Interrogatory No. 4, Preliminary Statement, Section I.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

- A. The name, address, and job title of each person or entity who prepared such materials.
- B. The name, address, and job title of each person who currently has possession of such materials and their present location.
- C. The date the materials were prepared.
- D. The media used to disseminate the sales materials.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products, which is denied. To the best of Crane Co.'s knowledge, it distributed catalogs that would have referenced products identified in Interrogatory No. 4. Although Crane Co. is not certain, it assumes it produced other materials, that may or may not have mentioned those products. See Preliminary Statement, Section I.

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.
- B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.
- D. The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 23 to the extent that it implies that Crane Co. manufactured asbestos-containing products, which is denied. Subject to the foregoing, Crane Co. is not aware of any document of the type requested in this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER: The following chart identifies the confirmed primary insurance coverage available to Crane Co. Additional primary coverage may be available for prior years; but it is subject to dispute by certain carriers:

Carriers	Policy Number	Term	Limits
Globe Indemnity	GLC 011930	1/1/60-1/1/61	1 M OCC/2M AGG
Globe Indemnity	GLC 011931	1/1/61-1/1/62	1M OCC/2M AGG
CCC	CL 42936798	7/1/61-7/1/64	1M OCC/2M AGG PER YEAR
Liberty Mutual	LG1621004017028	2/1/68-2/1/69	1M OCC/2M AGG
Liberty Mutual	LG1621004017029	2/1/69-2/1/70	1M OCC/2M AGG
Liberty Mutual	LG1621004017020	2/1/70-2/28/71	1M OCC/2M AGG
Hartford	10 CA 46800	2/28/71-7/1/72	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/72-7/1/73	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/73-7/1/74	1M OCC/1M AGG
Aetna	O1AL260803SCA	7/1/76-7/1/77	1M OCC/1M AGG
Aetna	O1AL260851SCA	7/1/77-7/1/78	1M OCC/2M AGG
Aetna	O1GL8SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	O1AL265932SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	O1GL145SCA	7/1/79-7/1/80	1M OCC/2M AGG
Aetna	O1AL265996SCA	7/1/79-7/1/80	1M OCC/2M AGG
Continental	SRL3636025	7/1/80-7/1/81	1M OCC/2M AGG
Continental	SRL3636199	7/1/81-7/1/82	1M OCC/2M AGG
INA	CFG209262	7/1/82-7/1/83	1M OCC/2M AGG
INA	CFG209868	7/1/83-7/1/84	1M OCC/2M AGG
INA	CFG3141403	7/1/84-7/1/85	1M OCC/2M AGG
INA	CFG 607749673	7/1/85-7/1/86	1M OCC/2M AGG

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published threshold limit values for "asbestos" which are premised upon the same medical assumption that a

human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and the specific diseases listed in this Interrogatory. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain

circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published threshold limit values for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and the specific diseases listed in this Interrogatory. Knowledge in this area, as in all scientific areas, develops over time and

allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 27:

As to pleural disease, pleural thickening or pleural plaques, state:

- A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- F. Who is the custodian of such information.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each

differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published threshold limit values for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and the specific diseases listed in this Interrogatory. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.

- B. The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.
- H. Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has

published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published threshold limit values for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and the specific diseases listed in this Interrogatory. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

- A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.
- B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?
- C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

- D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.

ANSWER: Crane Co. objects to this Interrogatory because it assumes facts not in evidence.

Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Subject to and without waiving the foregoing objections, Crane Co. is not aware of any established causal link between the diseases referred to in this Interrogatory and asbestos exposure.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory, because it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Crane Co. further objects to the use of the term "asbestos products" and the term "health hazards," in that those terms are not limited to (1) products manufactured or sold by Crane Co. or (2) any particular type of "health hazard." Subject to the foregoing, yes, based upon studies performed by Donna Ringo. By way of further

answer, Crane Co. did not manufacture or design asbestos-containing products, as it understands those terms. See response and objections to Interrogatory No. 4, Preliminary Statement, Section I.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER: Crane Co. believes Cranite sheet packing was shipped flat, in sheet form. Crane Co. knows of no information responsive to this interrogatory with respect to pipe. The packaging of asbestos-containing cement is illustrated in catalogs that were produced in this lawsuit. See response and objections to Interrogatory Nos. 4 and No. 6. See also Preliminary Statement, Section I.

INTERROGATORY NO. 32:

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

- A. The name of the company manufacturing the asbestos products.
- B. The trade name affixed to those products.
- C. The periods of time covered by each such agreement.
- D. The volume, in dollar amount, of each transaction.
- E. The initial purchaser of the products.

ANSWER: To the best of Crane Co.'s knowledge, no. See also response and objections to Interrogatory No. 4, Preliminary-Statement, Section I.

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory as being unduly overbroad and as seeking irrelevant information and is not likely to lead to the discovery of admissible evidence. Subject to and without waiving those objections, Crane Co. is not precisely aware of the specific entities from which it obtained asbestos-containing components for its industrial products. Nevertheless, based upon available documents, it appears that, at various times, Crane Co.'s approved suppliers may have included B.F. Goodrich Co., Goodyear Tire & Rubber Co., and Sweet Rubber Co. of Akron, Ohio, with respect to "Cranite" material; Raybestos Manhattan, Inc., Johns-Manville, Inc., Garlock, Inc., "Klingerit" and Nicolet, Inc., with respect to sheet gasket material, Crane Packing Co. (later John Crane-Houdaille, Inc.), Johns-Manville, Inc., Anchor Packing, Raybestos-Manhattan, Greene-Tweed, Garlock, Inc., Lindstrom & King, and R.M. Industrial Products with respect to valve packing, Johns-Manville, Flexitallic, Spirotallic, Lamons Gasket Co., and R-Way Gasket & Supply Co., with respect to spiral wound gaskets, Keasby-Mattison with respect to cement pipe, and Johns-Manville with respect to miscellaneous products. The foregoing list is not intended to be an exhaustive list of Crane Co.'s suppliers. To the contrary, it merely reflects the information of which Crane Co. has become aware in the course of reviewing documentary evidence. See also Preliminary Statement, Section I.

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- A. The name, address, and job title of each person having custody of each of those documents and their current location.
- B. A brief description of each such document, including the dates and the parties signatory.

ANSWER: See answer to Interrogatory No. 32.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and seeks information neither relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence because, *inter alia*, it is not in any way related to the alleged exposure of the plaintiff in this action. Subject to and without waiving the foregoing objection, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting.
- B. The general subject matter discussed at each meeting.
- C. Who was in attendance at each meeting.
- D. Where and by whom the written minutes are presently maintained.
- E. By whom the minutes were, taken and put into final format.
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 36 to the extent it assumes Crane Co. manufactured asbestos-containing products,

which is denied. Crane Co. further objects to this interrogatory to the extent it suggests that Crane Co.'s products presented health hazards when used as intended. Subject to the foregoing, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities; currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.
- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER: No.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: Crane Co. does not presently maintain an organized collection of sales documents relating to asbestos-containing products. See Preliminary Statement, Section I.

INTERROGATORY NO. 39:

May you call company representatives as witnesses at the trial of any of these cases? If so, list:

- A. The name, address, and job title of each company representative who may be called.
- B. A summary of the testimony expected to be given by each such witness.
- C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory as being premature. In the absence of product identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co. will produce witness information as required by the applicable rules of civil procedure and/or court order. Subject to the foregoing, Crane Co. may call William N. McLean as a trial witness. We may also call a representative of the Crane Co. to authenticate corporate documents and discuss the content of same. The identity of that witness will be supplemented pursuant to the Texas Rules of Civil Procedure. See response and objections to Interrogatory No. 1.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed; or contracted or supplied products containing asbestos? If so, for each such entity, state:

- A. Full and correct name;
- B. Principal place of business;
- C. State of incorporation;
- D. Date of acquisition by Defendant;
- E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER: See response and objections to Interrogatory No. 4. Subject to and without waiving the foregoing objections, with respect to cement and pipe, to the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, which is denied. Subject to the foregoing, Crane Co. generally expected the products referenced in its response to Interrogatory No. 4 to reach the purchaser in the same condition in which they were delivered.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos containing products.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to Interrogatory No. 42 to the extent it assumes that Crane Co. manufactured asbestos-containing products, which is denied. Crane Co. further objects to the use of the term "foreseeable" as stating a legal conclusion, and in being overbroad in terms of to whom a fact may have been foreseeable. Subject to the foregoing, Crane Co. did not control the products referenced in its response to Interrogatory No. 4 once they left its possession. The subsequent use of those products was within the control of the purchaser, not Crane Co. Crane Co. believes that tradesmen who customarily worked with the equipment it manufactured and sold would have come into contact with that equipment.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.
- B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, which is denied. Subject to the foregoing, it does not appear that this interrogatory relates to the products identified in Crane Co.'s response to Interrogatory No. 4. To the extent relevant, Crane Co. believes that Cranite could be installed and removed without releasing asbestos fibers.

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, which is denied. Subject to the foregoing, gaskets, packing and discs contained in Crane Co. industrial equipment may have needed to be replaced from time to time.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessors) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overly broad, unduly burdensome, and seeks information neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence because, *inter alia*, it is not in any way limited to the alleged exposure of the plaintiff in this action. Subject to the foregoing, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER: See response and objections to Interrogatory No. 45.

INTERROGATORY NO. 47:

Has your company or its subsidiaries or predecessors) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- A. Name of the person or firm conducting such studies;
- B. The date the studies began and the date they were completed;
- C. Any publication or other written dissemination of the results of the studies;

- D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory as being unduly broad and ambiguous. During its history, Crane Co. was involved with developing the items of industrial equipment that it manufactured and sold. As part of those efforts, Crane Co. investigated the quality of components, some of which may have contained asbestos. Nevertheless, there is no record that any research or testing was done with respect to the issue of asbestos. Crane Co. did not research asbestos products, as it understands those terms. Therefore, while a minimal amount of engineering time may have been devoted to developing information regarding the quality of gasket, packing, and disk materials manufactured by others, there were no funds expended in researching asbestos.

INTERROGATORY NO. 48:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

- A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
- B. What percentage of gross sales did your company or its predecessors) spend on research concerning the health effects of asbestos?
- C. State in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER: In addition to the objections stated thus far, to the best of Crane Co.'s knowledge, it presently knows of no individuals or departments who, on its behalf, researched or developed asbestos-containing products. See Preliminary Statement, Section I.

INTERROGATORY NO. 49:

Does your company have, or has it ever had, or have your predecessors) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;
- B. Whether or not such Medical Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department.

ANSWER: To the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s) and year said warning was first applied.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 50 to the extent it implies that Crane Co. manufactured asbestos-containing products, which is denied. Subject to the foregoing objections, to the best of Crane Co.'s knowledge, "warnings" were placed on steel valves in approximately 1985. See objections and response to Interrogatory No. 14.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER: See response and objections to Interrogatory No. 4.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and

which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 52 to the extent it implies that Crane Co. manufactured asbestos-containing products, which is denied. Crane further objects to this interrogatory to the extent it implies that there was a product that "could be substituted for" asbestos-containing components that were associated by any Crane Co. product. In the late 1970s and early 1980s, as a result of changes in customer preferences, Crane Co. began to explore the prospect of replacing the asbestos containing components in its industrial products. At that time, Crane Co. encountered difficulty locating suitable substitute materials. Crane Co., nevertheless, modified its engineering specifications in 1985 to phase out asbestos-containing components from all valves other than one specific valve designed for petroleum industry applications. With respect to cement pipe and cement, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 53:

Did your company or its predecessors) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- C. The dates of recall;
- D. The purpose for the recall.

ANSWER: Subject to and without waiving the foregoing objections, to the best of Crane Co.'s knowledge and subject to its understanding of the term "recall," no.

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos free products were first placed on the market.

ANSWER: Subject to and without waiving the foregoing objections, Crane Co. objects to the use of the term "your asbestos-containing products," because it never manufactured any product composed of asbestos. Subject to the foregoing, to the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 55:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER: See response and objections to Interrogatory No. 52.

INTERROGATORY NO. 56:

Did your company or its predecessors) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overbroad and seeks information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any industrial hygiene surveys involving the use of Cranite sheet packing material. In 1987, Crane Co. performed dust monitoring at two of its valve plants. The results of that monitoring revealed the presence of fibers at no greater than background levels.

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessors) or subsidiaries were first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.

ANSWER: To its knowledge, Crane Co. has no information available to it that would enable it to answer this Interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 63 for total dust, and not asbestos dust alone?

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory as confusing when read in context with Interrogatory No. 63. See response and objections to Interrogatory Nos. 57 and 59.

INTERROGATORY NO. 59:

State in detail what tests, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to the use of the term "your asbestos-containing products" to the extent it implies Crane Co. manufactured "asbestos-containing products", which is denied. Subject to the foregoing, to the best of Crane Co.'s knowledge, none. See response and objections to Interrogatory No. 9.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- A. The name, address, and job classification of each such expert witness;
- B. The subject matter on which the expert is expected to testify;

- C. The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- D. Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;
- E. Identify all documents that you have provided to each person identified in response to subparagraph (a) above;
- F. Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER:

Robert M. Ross, M.D., FCCP
6550 Fannin Street
Suite 2403
Houston, TX 77030
713-383-6100

Dr. Ross is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Brian Bradley
403 Woodlawn
Pasadena, Texas 77504
(713) 941-0088

Dr. Bradley is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Philip T. Cagle
Department of Pathology
Baylor College of Medicine, Suite 220 B
One Baylor Plaza
Houston, Texas 77030
(713) 798-4951

Dr. Philip T. Cagle is an Assistant Professor, Baylor College of Medicine, Department of Pathology, and is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer. He may also testify as to the physiological design and function of the lungs, the effect of asbestos on the lungs and other parts of the body, and on the body's defense mechanisms. He may also testify concerning the scientific literature on the biological and toxicological effects of asbestos. He may also testify about the body's biologic responses to asbestos and all types of cancer risks from asbestos exposure. Dr. Cagle may further testify as to the facts and circumstances regarding the nature of the injuries and damages that are the subject of this action. He may also testify about the contribution of smoking or other exposures to the plaintiff's condition. Dr. Cagle may testify about the medical literature

Dr. George L. Delclos
6550 Fannin #2403
Smith Tower
Houston, Texas 77030
(713) 790-6250

Dr. Delclos is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Gregory Foster
PULMONARY MEDICINE CONSULTANTS
375 Municipal Dr., Suite 218
Richardson, Texas 75080
(972) 680-0666

Dr. Foster is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Robert O'Neal
Rt. 1, Box 168
Perkinston, Mississippi 39573
(601) 528-9477

Dr. Robert O'Neal is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer.

Dr. Scott Donaldson
PULMONARY MEDICINE CONSULTANTS
375 Municipal Drive, Suite 218
Richardson, Texas 75080
(972) 680-0666

Dr. Donaldson is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Samuel H. Cade, M.D.
Baylor University Medical Center
Department of Radiology
3500 Gaston Avenue
Dallas, TX 75246
(214) 820-3219

Dr. Cade is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Elliott Hinkes
301 North Prairie Avenue, Suite 311
Inglewood, California 90301-4574
(310) 674-0050

Dr. Hinkes is a specialist in the area of oncology. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Russell P. Sherwin, M.D.
2011 Zonal Avenue, HMR-201
Los Angeles, California 90033
(323) 257-3599

Dr. Russell P. Sherwin is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer.

Dr. John R. Holcomb
4410 Medical Drive, Suite 440
San Antonio, Texas 78229
(210) 692-9400

Dr. Holcomb is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Gail D. Stockman
815 North Fourth, Suite A
Longview, TX 75601
(903) 753-0787

Dr. Stockman is a specialist in the area of respiratory disease. She will testify as to all matters pertaining to her examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; her opinion as to whether plaintiff suffers from asbestos related diseases and the basis for such opinion; the plaintiff's current medical condition and prognosis. Dr. Stockman may also offer an opinion on state-of-the-art.

Dr. William Lee Eschenbacher
Pulmonary Function Laboratory
The Methodist Hospital
6565 Fannin
Houston, Texas 77030
(713) 790-2076

Dr. Eschenbacher is a specialist in the area of pulmonary disease. He may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from an asbestos related disease and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Donald Greenberg
The Methodist Hospital
Department of Pathology
6565 Fannin Street
2nd Floor
Houston, Texas 77030
(713) 723-9041

Dr. Greenberg is a specialist in pulmonary pathology. He may testify as to all matters pertaining to this review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer a medical opinion regarding asbestosis diagnosis and cancer.

Jon H. Ritter, M.D., F.C.A.P., F.A.S.C.P.
Division of Surgical Pathology
Suite 300 Peters Building
Washington University Medical Center
One Barnes Hospital Plaza
St. Louis, Missouri 63110
(314) 362-0101

Dr. Ritter is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer.

Dr. Mark Wick
University of Virginia Health Science System
Pathology Department, Room 3900
Jefferson Park Avenue, Box 214
Charlottesville, VA 22908
Phone: 804/982-4403

Dr. Wick is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer.

Horton Corwin Hinshaw, Sr., M.D., Deceased

By deposition taken November 19, 20, and 21 and December 10 and 11, 1984 in Cause No. C-83-6251-RFP, *In Re: Related Asbestos Cases* In the United States District Court In and For the Northern District of California; and *In Re: Related Shipyard and Applicator Cases: Alameda County Asbestos Litigation*, In the Superior Court of The State of California In and For the County of Alameda; and *In Re: Shipyard and Applicator Cases (Clapper & Brayton) Consolidated for Discovery*; In the Superior Court of The State of California In and For the County of Solano. Dr. Hinshaw is unavailable to testify live in the referenced case. His prior deposition and/or trial testimony may include but is not limited to possible state-of-the-art testimony.

Dr. John G. Weg, and/or Custodian of Records
Division of Pulmonary & Critical Care Medicine
University of Michigan Medical Center
1500 East Medical Center Drive
Ann Arbor, Michigan 48109
(734) 763-6933

Dr. Weg is a specialist in the area of pulmonary disease. He may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communication with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from an asbestos related disease and the basis for such opinion; the plaintiff's current medical condition and prognosis.

Dr. Thomas Wheeler
Department of Pathology
Baylor College of Medicine
One Baylor Plaza
Houston, Texas 77030
(713) 790-2370

Dr. Thomas Wheeler is an Assistant Professor, Baylor College of Medicine, Department of Pathology, and is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer.

John E. Craighead, M.D.
104 Four Winds Road
Ferrisburgh, Vermont 05456
(802) 425-3480

Dr. John E. Craighead is an Assistant Professor, University of Vermont, College of Medicine, Department of Pathology, and is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer. He may also testify as to the physiological design and function of the lungs, the effect of asbestos on the lungs and other parts of the body, and on the body's defense mechanisms. He may also testify concerning the scientific literature on the biological and toxicological effects of asbestos. He may also testify about the body's biologic responses to asbestos and all types of cancer risks from asbestos exposure. Dr. Craighead may further testify as to the facts and circumstances regarding the nature of the injuries and damages that are the subject of this action. He may also testify about the contribution of smoking or other exposures to the plaintiff's condition.

James H. Yeager, Jr., Ph.D.
Yeager Economics, Inc.
14 Westpoint Drive
Missouri City, Texas 77459
(281) 431-6200
(281) 431-0750 fax

Mr. Yeager is an economist. He may testify regarding his review of a report generated by the Plaintiff's economist and testify to motions concerning the loss of earnings/ income/earning capacity claimed by the Plaintiff and/or Plaintiff spouse or family.

Dr. Victor Roggli and/or Custodian of Records
Department of Pathology
Duke University Medical Center
P. O. Box 3712
Durham, North Carolina 27710
(919) 648-8111

Dr. Victor Roggli is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer. He may also testify as to the physiological design and function of the lungs, the effect of asbestos on the lungs and other parts of the body, and on the body's defense mechanisms. He may also testify concerning the scientific literature on the biological and toxicological effects of asbestos. He may also testify about the body's biologic responses to asbestos and all types of cancer risks from asbestos exposure. Dr. Roggli may further testify as to the facts and circumstances regarding the nature of the injuries and damages that are the subject of this action. He may also testify about the contribution of smoking or other exposures to the plaintiff's condition. Dr. Roggli may testify about the medical literature.

Dr. I. A. Feingold
South Miami Hospital
6200 Southwest 73rd Street
Miami, Florida 33143
(305) 661-4611

Dr. Feingold is Chief of Pulmonary Medicine at South Miami Hospital, and is a specialist in pulmonary pathology. He may testify as to all matters pertaining to his review/examination of the plaintiff's pathological tissue samples, autopsy results, and medical records to offer medical opinion regarding asbestosis diagnosis and cancer. He may also testify as to the physiological design and function of the lungs, the effect of asbestos on the lungs and other parts of the body, and on the body's defense mechanisms. He may also testify concerning the scientific literature on the biological and toxicological effects of asbestos. He may also testify about the body's biologic responses to asbestos and all types of cancer risks from asbestos exposure. Dr. Feingold may further testify as to the facts and circumstances regarding the nature of the injuries and damages that are the subject of this action. He may also testify about the contribution of smoking or other exposures to the plaintiff's condition. Dr. Feingold may testify about the medical literature.

William Dyson, Ph.D.
Workplace Hygiene, L.L.C.
6518 Bryan Blvd., Suite 203
Greensboro, NC 27409
336/931-0300

Dr. Dyson will testify regarding state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of

plaintiffs. Epidemiology and general medicine regarding asbestos exposure. This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

Michael A. Graham, M.D.
Division of Forensic and Environmental Pathology
St. Louis University School of Medicine
1402 Grand Avenue Boulevard
St. Louis, MO 63104
314/577-8298

Dr. Graham is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition; and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effects on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') specifically. Dr. Graham is a pathologist who will testify about asbestos-related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the plaintiff(s). Dr. Graham may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's(s') experts' reports and supplemental reports.

Dr. Peter Barrett, M.D., FACR
300 Boylston Street, Suite 714
Boston, MA 02116-3923
617/426-2110

Dr. Barrett is a physician and a radiologist/B-Reader. It is impossible to set forth in precise detail the exact topics and content of the testimony of Dr. Barrett. Dr. Barrett has researched asbestos and asbestos medicine for many years. He has opinions about his research, his studies, the development of knowledge about asbestos, and about the relationship of asbestos to disease. Dr. Barrett has specific opinions about the development of the disease, mesothelioma, and its relationship to crocidolite, amosite, and chrysotile. He will offer opinions about his research into chrysotile and where and how it might be implicated in the development of asbestosis, mesothelioma, and any lung cancer. Dr. Barrett is expected to testify about the epidemiology of asbestos related diseases and the incidence of disease in both men and women.

1. the anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regards to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems;
2. the nature of asbestos and asbestos-related disease;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity;
4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;
5. the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system and other causes of obstructive and restrictive disease or defects of the respiratory system;
6. methods of diagnosis of various diseases with other non-asbestos-related diseases;
7. incidence of lung cancer among individuals with asbestosis or asbestos exposure as compared to non-asbestotic asbestos workers, non-asbestos exposed workers and to the general population;
8. cigarette smoking and its effects on the lungs and other organs;
9. the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect;
10. the difference between impairment and disability;
11. the effect of asbestosis or other asbestos-related disease, or asbestos exposure without asbestosis or other asbestos-related disease, on disability and life expectancy;
12. the lack of relationship between the presence of pleural plaques and a later development of any form of cancer;
13. the history of evolution and knowledge of asbestos-related diseases;
14. the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;
15. cancer incidence in the general population and among asbestos workers and its potential causes;
16. the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types and the cause of mesothelioma;

17. to the extent not covered above, asbestos medicine in general.

He is expected to testify generally about medicine, asbestos, human physiology, and general topics regarding asbestos related disease. He will also testify about radiological concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis.

He is expected to testify generally about radiological concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis. Dr. Barrett will testify that some asbestos-containing products are not hazardous and that any possible asbestos exposure from such asbestos-containing products could not have caused any of the plaintiffs' alleged illnesses.

Dr. Barrett is a practicing radiologist and a B-reader certified by NIOSH. His testimony will relate to his interpretation of chest films taken of the plaintiffs, as disclosed in reports produced, if any, and will be made available to the plaintiffs. It is anticipated that Dr. Barrett will testify generally as to his interpretation of the plaintiffs' chest films, the presence of any asbestos-related condition as evidenced on the chest film, and the presence of other abnormalities or conditions unrelated to any exposure to asbestos.

Lawrence R. Birkner
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, California 91362-1822

Mr. Birkner has recently moved to Arizona; a current address will be provided. Mr. Birkner is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving re-entrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection agency's guidelines as they relate to various types of products including gaskets and packing. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Birkner may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may

testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any co-defendants.

Mr. Birkner may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Mr. Birkner may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos-containing products or equipment with asbestos insulation. Mr. Birkner may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr. Birkner may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

INTERROGATORY NO. 61:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

- A. identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.
- B. Each and every individual Plaintiffs, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;
- C. the negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff s, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;
- D. each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER:

William N. McLean, Crane Valve Group, 860 Remington Blvd., Bolingbrook, IL 60440. Mr. McLean will testify with respect to valves manufactured and/or supplied by Crane Co., the composition and components of these valves, and any other issues arising from Plaintiff's testimony against Crane Co.

Tom Ungerland
One Stamford Place
Stamford, CT 06902
203/363-7243.

Mr. Ungerland is a Crane Co. document authentication witness.

The following are co-workers who may testify as fact witnesses regarding matters pertaining to the worksite conditions and exposure of the Plaintiff:

Danny Kovacs (co-worker at Homasote jobsite)

Richard Lotwig
Doylestown, PA
(co-worker at AJ Haines jobsites and Co-founder of B&L Industrial)

Joseph Narkum
(co-worker of B&L Industrial)

Al Haines, Supervisor

Bill Wagner
(co-worker at Homasite jobsite)

Noel Narkum
(worked for B&L Industrial)

Joe Bronsard
(co-worker at Homasite jobsite)

Terry Dansfield
(co-worker at Homasite jobsite)

Paul Mascotta
(co-worker at Homasite jobsite)

Jim Tracchi
(co-worker at Homasite jobsite)

Dave Stam
(co-worker at Congoleum plant)

Dick Toft
749 Puritan Ave.
Trenton, NJ
Contact through:
Dennis Toft
Wolfe and Samson
280 Corporate Center Road
5 Becker Farm Rd.
Roseland, NJ 07068
973/740-0500
(salesperson at Crane Co.)

John Kennedy
(salesperson at Crane Co.)

Ted Munchbach
Bristol, PA
(co-worker at B&L Industrial)

George Lyon
(co-worker for B&L Industrial at Columbian Carbon jobsite)

Ken Dixon
Hamilton Township, NJ
(co-worker for B&L Industrial at Goodall Rubber jobsite)

The following are medical care providers and their custodians of record whose records and opinions may be used at the trial of this matter.

Dr. George Corio
Trenton, NJ

St. Francis Hospital
Trenton, NJ

Dr. Trattori
Trenton, NJ

Dr. Christeta Laurente

RJW University Hospital and Capitol Imaging
One Hamilton Health Place
Hamilton, NJ 08690

Dr. Marjorie Gonzalez
1650 State Highway 33
Hamilton, NJ 08690

Dr. Nenita McIntosh

Dr. Elizabeth Rosvold
2079 Klockner Rd., Ste.15
Hamilton Square, NJ 08690

Dr. Daniel Stermann
University of Pennsylvania Hospital
3400 Spruce St.
Philadelphia, PA 19104

Dr. Joseph Friedberg
Chief of Thoracic Surgery
Jefferson University Hospital
Room 605 College
1025 Walnut Street
Philadelphia, PA 19107

RJW University Hospital Brain Scan & Lung Scan
Dr. I. Ahmad and Dr. R. Himdawi
1760 Whitehorse Hamilton Square
Hamilton, NJ 08690

Cardiothoracic Vascular Associates
1760 Whitehorse Hamilton Road, Suite 5
Trenton, New Jersey 08690

Capitol Imaging Associates
3535 Quaker Bridge Rd.
Mercerville, NJ. 08619

Robert Wood Johnson University
One Robert Wood Johnson Place
New Brunswick, NJ 08901

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: Crane Co. objects to this Interrogatory as an improper inquiry into Defendant's "core work product" and trial strategy, and thus not subject to discovery under the Texas Rules of Civil Procedure. Crane Co. will however, comply with any court order relating to the preparation of an exhibit list or list of proposed deposition testimony to be used at the trial of this case.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessor-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

- A. Identify the name and position of the employee or officer who received same;
- B. please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;
- C. please produce all documents upon which your responses above are based;
- D. please identify the name(s) and addresse(s) of any person(s) who can verify your above response;
- E. did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- F. if so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63 (a) above;
- G. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Fleischer-Drinker report in whole or in part for the proposition stated in 63 (e) above?

ANSWER: To the best of Crane Co.'s present knowledge, it never received a copy of the article identified in this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 64:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U.S. Public Health Service and authored by W. C. Dreessen ("the Dreessen Report")?

- A. Identify the name and position of the employee or officer who received same; -
- B. please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;
- C. please produce all documents upon which your responses above are based;
- D. please identify the name(s) and addresse(s) of any person(s) who can verify your above response;
- E. did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- F. if so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory 63 (a) above;
- G. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Dreessen Report in whole or in part for the proposition stated in 63 (e) above?

ANSWER: To the best of Crane Co.'s knowledge, it never received a copy of the article identified in this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 65:

Please identify documents or things, including x-rays, MRI's, CT-scans or other materials which will be used at time of trial (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: In addition to the objections stated thus far, Crane Co. specifically objects to this interrogatory as being premature. Crane Co. further objects to this interrogatory to the extent it attempts to expand Crane Co.'s discovery obligations under the Texas Rules of Civil Procedure. In the absence of firm identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co.

will provide exhibit and deposition information as required by the applicable rules of civil procedure and/or court order.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to interrogatory No. 4.

RESPONSE: See Preliminary Statement, Section I. Subject to and without waiving any objection stated thus far, Crane Co. possesses catalogs depicting its products that may be made available to plaintiffs' counsel at a mutually agreeable time and place.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE: Subject to and without waiving any objection stated thus far, in response to this interrogatory, Crane Co. will make its annual reports available to plaintiffs' counsel at a mutually agreeable time and place. See Preliminary Statement, Section I.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of all documents and other materials and reports identified in Answer to Interrogatory No. 60(d), other than Depositions and Medical History provided by Plaintiff.

RESPONSE: Expert witness reports have been provided to you both by counsel for Defendant and counsel for other Defendants in this litigation.

REQUEST FOR PRODUCTION NO. 4:

Please provide a copy of all documents and reports other than Deposition and Medical History provided by Plaintiff identified in Answer to Interrogatory No. 60(e).

RESPONSE: Please see the documents contained in the file of the designated experts who have given a deposition thus far or will give a deposition within the very near future.

REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of all documents, reports, and other materials identified in Answer to Interrogatory No. 62.

RESPONSE: See response and objections to Interrogatory No. 62.

REQUEST FOR PRODUCTION NO. 6:

Please produce any and all x-rays, MRI's, CT-scans, videotapes or other electronically or technologically created representations, depictions, picturizations, imaging or imagery collected by Defendant in the course of discovery.

RESPONSE: Crane Co. objects to this Request on the grounds that it is overbroad and vague, to the extent it seeks information which is not discoverable under the Texas Rules of Civil Procedure, i.e., Crane Co.'s "core work product." Crane Co. further objects on the grounds that this Request does not identify items, individually or by category, and describe each item and/or category with reasonable particularity as required by Rule 196.1(b) Texas Rules of Civil Procedure. Subject to and without waiving the foregoing objections, Crane Co. will produce medical records of any kind in its possession which are not equally available to plaintiff's counsel as to the Crane Co.

REQUEST FOR PRODUCTION NO. 7:

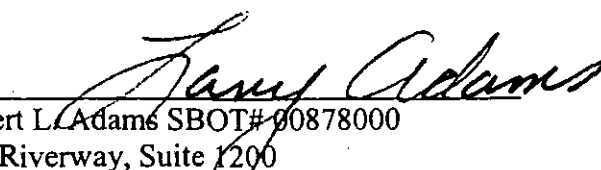
All documents which support, contradict, or are otherwise relevant to Plaintiffs' claims of exposure to Defendants' products any worksite identified in Plaintiffs' response to discovery.

RESPONSE: Crane Co. objects to this Request on the grounds that it is overbroad and vague, to the extent it seeks information which is not discoverable under the Texas Rules of Civil Procedure, i.e., Crane Co.'s "core work product".

Respectfully submitted,

DUNN, KACAL, ADAMS, PAPPAS & LAW, P.C.

BY:


Robert L. Adams SBOT# 00878000

One Riverway, Suite 1200

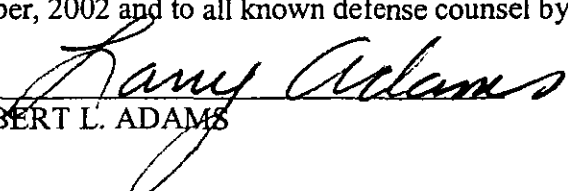
Houston, Texas 77056

713-529-3992; Fax: 713-529-8161

ATTORNEYS FOR DEFENDANT, CRANE CO.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been sent to Plaintiffs' counsel by first class mail, telecopy, hand delivery and/or certified mail, return receipt requested on this the 27 day of September, 2002 and to all known defense counsel by regular mail.


ROBERT L. ADAMS

LOUIS BARLETTA AND
MARY JANE BARLETTA.

vs.

AMERICAN CYANAMID, et al.,

IN THE DISTRICT COURT

KLEBERG COUNTY, TEXAS

105TH JUDICIAL DISTRICT

I, Augustus I. duPont, the undersigned declare as follows:

I am Augustus I. duPont of Crane Co., one of the answering defendants in the above-entitled matter, and I have been authorized to make this verification on its behalf.

I have read the foregoing CRANE CO.'S RESPONSES TO PLAINTIFF'S MASTER SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS and know the contents thereof. The information provided has been obtained by Crane Co.'s counsel through a review of existing business records and interviews of former employees of the company. I am informed and believe that the matters stated therein are true and on that ground I allege that the matters stated therein are true.

Dated:

9/26/02

Signed:

Augustus I. duPont
Augustus I. duPont