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Admitted in Ohio and Kentucky

June 9, 2009

VIA EMAIL AND REGULAR MAIL

John Mismas, Esq.
Joshua P. Grunda, Esq.
Bevan & Associates LPA, Inc.
6555 Dean Memorial Parkway
Boston Heights, OH 44236

Re: *Frank Sylvasy v. Parker-Hannifin Corporation, et al. (In Re Bevan Group 17)*
Court of Common Pleas, Cuyahoga County, Ohio - Case No. 695277

Dear Mr. Mismas and Mr. Grunda:

With this letter, I have enclosed Parker-Hannifin Corporation's Supplemental Responses to Plaintiff's First Master Set Of Interrogatories Propounded To All Defendants Pursuant To Rule 26(E).

Very truly yours,

DINSMORE & SHOHL

Michael D. Eagen

Michael D. Eagen

(w/authority by Kate R. Altz)

MDE/tlb
Enclosure
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**IN THE COURT OF COMMON PLEAS
COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

IN RE BEVAN GROUP 17

Frank Sylvasy,

Plaintiff,

vs.

GOODYEAR TIRE & RUBBER CO., et al,

Defendants.

Case No. CV 695277

JUDGES: HARRY S. HANNA
LEO SPELLACY

**PARKER-HANNIFIN CORPORATION'S SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST MASTER SET OF INTERROGATORIES
PROPOUNDED TO ALL DEFENDANTS PURSUANT TO RULE 26(e)**

Defendant PARKER-HANNIFIN CORPORATION hereby provides supplemental responses the Plaintiff's First Master Set of Interrogatories propounded by Plaintiff pursuant to Rule 26(e) as follows.

GENERAL OBJECTIONS

Defendant Parker makes the following general objections, whether separately set forth:

Parker-Hannifin Corporation (hereinafter "Parker") makes these responses on behalf of itself and as former successor-in-interest to its EIS Division.

Parker objects to disclosure of information that is not included in the scope of plaintiff's allegations. Plaintiff has not yet produced evidence or otherwise identified specific products associated with Parker which plaintiff alleges caused decedent's injury. Accordingly, Parker has not yet had an opportunity to complete its investigation of the facts relating to this case, has not completed discovery in this matter, and has not completed preparation for trial. All responses

contained herein are based only upon such information and documents which are presently available to and specifically known to Parker. It is anticipated that further discovery, independent investigation, and analysis will supply additional facts and add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions.

Plaintiff herein alleges injuries to plaintiff resulting from exposure to asbestos-containing products over specific periods of time. Therefore, Parker's answers are limited by time and place. These answers are limited to the time periods in which Parker or its alleged predecessor or related companies produced products that contained any type of asbestos fiber within its component ingredients and are in no way meant to encompass those portions of the employment history of the plaintiff during which time Parker or its alleged predecessors did not sell said products. Parker's investigation regarding plaintiff's allegations, its predecessors, and its products which may have contained asbestos-containing material is ongoing. This investigation involves identification of documents that are many decades old, locating former employees that have long since left Parker's EIS division or its predecessors' and/or successors' employ and research on companies that are no longer within Parker's control as they have been sold to others. Parker reserves the right to introduce at trial additional evidence which is presently unknown and/or is discovered subsequent to the date of these responses and reserves the right to amend or supplement these responses without motion at any time. All responses below are subject to the objections set out below, without waiving same, and are given without prejudice to Parker's right to produce evidence of any subsequently discovered facts.

Parker incorporates all objections made by others to identical or substantially similar questions. Parker also asserts and reserves all objections available under rules of procedure, including those objections previously made by other defendants and those ruled upon by this

court, because of the totality of circumstances that affects Parker's ability to respond to this discovery. Many of the questions are objectionable because they are overbroad, unduly burdensome, and, in some cases, not reasonably calculated to lead to the discovery of admissible evidence. In the interests of brevity, these objections are hereby incorporated by reference into the responses that follow below.

1. Parker objects generally to the extent that any of the interrogatories seek information protected by the attorney-client privilege and/or attorney work product privilege. Such information shall not be provided in the responses to plaintiff's interrogatories and any inadvertent disclosure thereof shall not be a waiver of any privilege with respect to such information or any attorney work product privilege which may attach thereto.

2. Parker objects generally to the extent that any of the interrogatories seek to require it to identify persons, entities, or events not known on the grounds that such instructions, definitions, or requests are overbroad and seek to require more of Parker than any obligation imposed by law, subject Parker to unreasonable and undue annoyance, oppression, burden and expense, and seek to impose upon Parker an obligation to investigate or discover information or material from third parties or sources which are equally accessible to the parties.

3. Parker objects generally to plaintiff's use of prefatory definitions which seek information protected by the attorney-client privilege and work product doctrine.

EVER SELL ASBESTOS

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products (including equipment of any kind containing asbestos in any form)? If so, please state the following:

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, or Defendant's subsidiary);

- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
1. The trade or brand name.
 2. Its identification number (model, serial number, etc.).
 3. The time period it was manufactured, mined, marketed, distributed or sold.
 4. Its physical description including color, general composition, and form.
 5. A detailed description of its intended use and purpose.
 6. A detailed description of the type package in which it was sold, listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.
 7. The percent of asbestos which it contained.
 8. The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite).
- (c) The time period during which each of these products were on the market;
- (d) The material components/ingredients of each such product, giving specific or approximate percentage both by weight and by volume of each material component/ingredient (this interrogatory is not limited to the asbestos component of the product but seeks information as to the nature, weight and volume of non-asbestos ingredients, as well) of each such product;
- (e) How each of these asbestos-containing product can be distinguished from those of competitors;
- (f) A description of the physical appearance of such product;
- (g) A detailed description of the intended uses.

ANSWER:

Parker objects to this Interrogatory as overly burdensome and oppressive and overbroad in time and scope, to the extent that it addresses information and documentation concerning facts,

products, and categories wholly unrelated to this defendant or the events and circumstances at issue for the purposes of this defendant. On these bases, the Interrogatory calls for information which is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, Parker responds as follows:

Unless otherwise noted, all asbestos-containing components used in the products referred to below were manufactured by others, and used chrysotile fibers that were encapsulated in a matrix with other materials in a manner that at most may have resulted in a de minimis release of fibers from the product. Parker-Hannifin Corporation purchased EIS Brake Parts in 1978 and incorporated it into its corporate structure as the EIS Division of Parker-Hannifin Corporation. Parker sold the EIS Division in 1986 to Standard Motor Products, Inc.. EIS started as a manufacturer of non-asbestos-containing brake system component parts such as master cylinders, brake hardware kits, and wheel cylinders. These component parts were hardware associated with vehicle braking systems and did not contain asbestos. EIS manufactured replacement brake parts for most domestic and foreign passenger cars and light trucks. At no time did EIS manufacture component parts, brake shoes, or brake pads for original equipment manufacturers. Instead, EIS manufactured aftermarket replacement brake parts which were sold primarily to wholesale warehouse distributors.

In 1967, EIS Brake Parts began re-manufacturing brake shoes and manufactured new brake pads for sale in the automotive aftermarket. Total sales of all brake pads and brake shoes represented approximately 15% of the EIS sales in the 1982. Replacement pads and shoes were made to original equipment manufacturer specifications in order to maintain safety and performance consistent with original equipment. In the late 1970's to early 1980's, EIS Brake

Parts introduced metallic and semi-metallic disc brake pads for sale in the automotive aftermarket. After this time, approximately 50% of the disc brake pads manufactured and sold by EIS Brake Parts contained semi-metallic linings which did not contain asbestos. For replacement brake shoes and pads that required asbestos-containing lining as specified by the original equipment manufacturer, EIS purchased and installed asbestos-containing linings manufactured by others. Asbestos-containing linings were installed in order to comply with original equipment specifications necessary to safely stop the vehicles on which such brake shoes and pads were installed.

EIS Brake Parts sold products that were intended for use in a configuration in which asbestos fibers would not be released. The asbestos-containing linings installed by EIS were designed and manufactured by others and contained chrysotile asbestos fibers encapsulated in resins and other bonding agents such that the products would not release asbestos fibers when the product was used. EIS relied on such lining manufacturers to conform to the standards of the industry at the time of production. The products containing asbestos were made for the specific purposes and needs of products that specified or required asbestos. EIS Brake Parts never manufactured asbestos-containing linings for installation on its brake shoes and pads.

Neither EIS Brake Parts nor the EIS Division of Parker-Hannifin Corporation manufactured brake linings, brake bands, clutch facings, or clutch plates. The brake shoes and pads manufactured by both EIS Brake Parts and the EIS Division of Parker-Hannifin Corporation were primarily for automobiles and light duty trucks. EIS manufactured a limited product line for use on heavy-duty vehicles including tractors, trailers and/or buses. In 1982, the EIS Division of Parker-Hannifin Corporation purchased the stock of Industrial and Automotive Associates, Inc., which re-manufactured brake shoes and manufactured new brake pads under the Cali-Blok label.

Parker is informed and believes that Industrial and Automotive Associates, Inc., also re-manufactured brake shoes and manufactured new brake pads for the automotive aftermarket. Industrial and Automotive Associates, Inc., manufactured brakes under the Cali-Blok label at a manufacturing facility in Carson, California, and maintained a separate corporate structure while Parker owned its stock. Parker sold both the EIS Division and its stock holdings in Industrial and Automotive Associates, Inc., to Standard Motor Products, Inc., in August 1986.

Bonded or riveted linings were attached to a steel brake shoe or steel pad. Parker is informed and believes that the only markings on the shoes and pads were edge code stamped on the lining edges. Asbestos was used for heat tolerance and fade resistance.

Brake shoes were packaged in cardboard boxes approximately 12 inches by 8 inches by 6 inches. Brake pads were packaged in cardboard boxes approximately 7 inches long 3 inches deep and 2 1/2 inches wide. Box dimensions varied slightly from 1978 to 1986. In the 1960s, 70s and 80s, EIS Brake Parts shoes and pads were packaged in a white box with green stripes and black lettering. The boxes also contained a red octagonal logo with the initials "EIS" in the center. In the 1980s, black shading was added to the box and the green striping was removed. Discovery is continuing.

7. Have any of the products listed above in answer to Interrogatory No. 5 been altered in chemical composition since first being marketed? If so, please state the following:

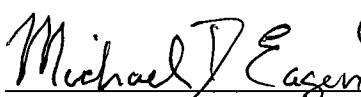
- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER:

Parker objects to this Interrogatory as overly burdensome and oppressive and overbroad in time and scope, to the extent that it addresses information and documentation concerning facts, products, and categories wholly unrelated to this defendant or the events and circumstances at issue for the purposes of this defendant. On these bases, the Interrogatory calls for information which is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection, Parker responds as follows:

Yes. In the late 1970's to early 1980's, EIS Brake Parts introduced metallic and semi-metallic disc brake pads for sale in the automotive aftermarket. These products were introduced in order to provide replacement disc brake pads that conformed to original equipment specifications. Parker-Hannifin is informed and believes that the linings purchased for use on disc brake pads were asbestos-free. Discovery is continuing.

Respectfully submitted as to all objections,

 (w/authority by Katerina R. Althaus)

Michael D. Eagen (0018659)

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Attorneys for Separate Defendant

Parker-Hannifin Corporation as former product

successor to EIS Brake Parts

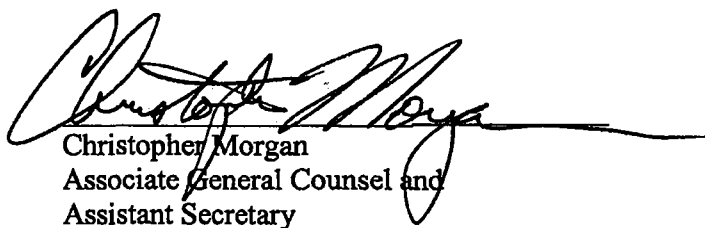
VERIFICATION

I, Christopher Morgan, am Associate General Counsel and Assistant Secretary of Parker-Hannifin Corporation, a defendant in the above-entitled action. I am authorized to make this verification on its behalf. I have read the foregoing Supplemental Responses to Plaintiffs' discovery to Defendants, and know their contents. The matters stated therein are true and correct based upon the information available to Parker-Hannifin Corporation.

I declare under penalty and perjury under the laws of the State of Ohio that the foregoing is true and correct.

Dated this 18th day of June, 2010, at Cleveland, Ohio.

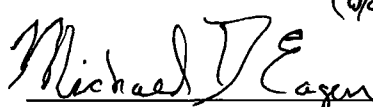
Parker-Hannifin Corporation



Christopher Morgan
Associate General Counsel and
Assistant Secretary

CERTIFICATE OF SERVICE

This is to certify that *Parker-Hannifin Corporation's Supplemental Responses To Plaintiff's First Master Set of Interrogatories Propounded To All Defendants Pursuant To Rule 26(e)* was served via e-mail and regular mail upon Plaintiff's Counsel, John Mismas and Joshua P. Grunda, Bevan & Associates, 6555 Dean Memorial Parkway, Boston Heights, Ohio 44236 on this 18th day of **June, 2010**.

(Authorized by Father & Alr)


Michael D. Eagen