

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

PLAINTIFF'S EXHIBIT

GVH-37

RUTH V. DICKERSON, INDIVIDUALLY,
AND AS PERSONAL REPRESENTATIVE
OF THE HEIRS AND ESTATE OF ELDON
CLAUDE DICKERSON, DECEASED,

CASE NO. 398302

Plaintiffs,

(JUDGE HARRY A. HANNA)

-VS-

A-BEST PRODUCTS COMPANY, ET AL.,

Defendants.

**DEFENDANT GEORGE V. HAMILTON, INC.'S ANSWERS TO PLAINTIFF'S
MASTER SET OF INTERROGATORIES**

GENERAL STATEMENT AND OBJECTIONS

George V. Hamilton, Inc. objects on the ground that plaintiffs' discovery requests are stated too broadly, are without proper specification, and, in effect, amount to nothing more than a "fishing expedition." George V. Hamilton, Inc., further objects to providing any information with regard to its products until plaintiffs have identified which of its products are at issue in the individual cases. The burden placed upon a defendant to respond to discovery without the identification of a product at issue or a specific job site where the product was used is excessive and onerous. Similarly, George V. Hamilton, Inc. objects to providing any information with regard to any of its products which are not at issue in this case.

George V. Hamilton, Inc. further objects to this request on the ground that it is not limited in scope to asbestos-containing products, which are in issue in this case. It is irrelevant whether George V. Hamilton, Inc. may have had any contracts for these facilities which did not involve asbestos-containing products.

George V. Hamilton, Inc. objects to references to time periods which are not relevant to the specific claims against it.

The corporate record retention policy of George V. Hamilton, Inc. is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc. has

not sold, distributed, or installed any asbestos-containing products for the past seven (7) years.

INTERROGATORIES

1. For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include 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.

ANSWER: Rodney E. Gate, President of George V. Hamilton, Inc. Mr. Gates has been employed at George V. Hamilton, Inc. since 1971. Mr. Gates has held the following positions: Takeoff man (1971-1976); Estimator (1976 - 1982); Project Manager (1982 - 1987); Contract Manager (1987 - 1990); President (1990 - present).

1.1 Please identify all documents used, related to, or referred to in connection with the preparation of or answers to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

ANSWER: None.

2. Please state whether or not Defendant is a corporation. If so, please state:

- (a) Your correct corporate name;
- (b) The state of your incorporation;
- (c) The address of your principal place of business;
- (d) Your registered agent for service in the state of Ohio;
- (e) For each Defendant claiming that this Court lacks personal jurisdiction, list year by year the total amount of income received by Defendant from entities in Ohio, any and all years that Defendant, as defined, has been licensed to do business in Ohio, and any real property owned at any time by Defendant or its present or past subsidiaries.

ANSWER:

- (a) George V. Hamilton, Inc.
- (b) Pennsylvania
- (c) River Avenue
McKees Rocks, PA 15136
- (d) Willman & Arnold, LLP
705 McKnight Park Drive
Pittsburgh, PA 15237

3. State Defendant's complete corporate or business history, including dates of

incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs. In addition:

- (a) if Defendant or any of its predecessors or subsidiaries at any time purchased, assumed, or in any other manner acquired ANY of the assets and/or liabilities of any corporation or entity at any prior time engaged in any aspect of the placing of asbestos-containing products into the stream of commerce or the insuring of asbestos-related risks, then please state the following as to each acquisition:
- (b) the name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- (c) the manner by which each such corporation, entity or interest therein, was acquired (e.g., merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (d) the date of each such acquisition;
- (e) the state in which each such acquisition was effected;
- (f) the state law governing each such acquisition if specified by contract;
- (g) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (h) identify each document reflecting or related to the history and/or transaction(s) set forth in answer to this Interrogatory.

ANSWER: **George V. Hamilton, Inc. was incorporated in 1947.**

- (a) **None.**
- (b) **None.**
- (c) **None.**
- (d) **None.**
- (e) **None.**
- (f) **None.**
- (g) **None.**
- (h) **None.**

4. Please state whether or not Defendant has purchased, assumed, or in any other

manner acquired any of the assets and/or liabilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products.) If so, please state the following:

- (a) the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- (b) the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (c) the date of each such acquisition;
- (d) the state in which each such acquisition was effected;
- (e) the state law governing each such acquisition if specified by contract;
- (f) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (g) whether the acquisition concerned asbestos-containing products.

ANSWER: No.

4.1 For each corporation, other than the answering Defendant, that has at any time in the past been involved in the placing of asbestos-containing products into the stream of commerce for which officers of the answering Defendant's corporation have also served as officers, directors or served in any managerial position while employed by the answering defendant, state:

- (a) the name of the entity involved in the placing of asbestos products into the stream of commerce;
- (b) the manner in which the entity was involved in the placing of asbestos containing products into the stream of commerce (i.e., mining, milling, manufacturing, distributing, installing, rebranding, etc.);

- (c) the specific products placed into the stream of commerce by the entity, year by year and by brand or trade name;
- (d) the name, positions and a brief description of the responsibilities of the person or persons serving the answering Defendant and the entity simultaneously, including the positions held with the entity and with the answering Defendant.

ANSWER: N/A.

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

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, Defendant's subsidiary or some other entity related to Defendant);
- (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, chrysotile).
- (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: Objection. This interrogatory is overly broad, unduly burdensome, fails to specify any period of time, fails to specify any location and is harassing. Without waiving this objection, this defendant responds that it is impossible for it to determine precisely what products it has sold in the past since it only retains record of sales for the past seven (7) years, and George V. Hamilton, Inc., has not distributed any asbestos-containing products for the past seven (7) years. However, George V. Hamilton, Inc. distributed certain asbestos containing products which were manufactured by other companies including Owens Corning Fiberglas, Owens-Illinois, Pittsburgh Corning Corporation, Eagle Picher Industries, Celotex Corporation, Keene Building Products, Baldwin Ehret Hill, and Philip Carey, among others. Because George V. Hamilton no longer has records of the sale of asbestos containing products manufactured by these entities, it can not provide any additional information regarding these products.

6. Does Defendant or any of its subsidiary companies claim that any patent would cover any product listed in answer to Interrogatory No. 5? If so, please state the following:

- (a) The date of each patent;
- (b) The date same was issued;
- (c) The number of each patent application that is pending.

ANSWER: George V. Hamilton, Inc. owns no patents.

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: See Objection and Answer to Interrogatory No. 5. Without waiving any objections, this defendant states that manufacturers did begin manufacturing asbestos-free products in the early 1970s. George V. Hamilton, Inc. does not have any information pertaining to specific products. Information about specific products should be requested from the manufacturer.

8. Have any of the asbestos-containing products listed in response to Interrogatory

No. 5 ever been marketed, distributed, packaged, labeled, and/or sold by any other company or business? If so, please state the following:

- (a) The name and address of each such company.
- (b) The names and address of Defendant's distributors in Ohio, West Virginia, Pennsylvania and Kentucky since 1940.
- (c) The date of each sale.
- (d) The name of the person at each location with whom you primarily dealt.
- (e) A list of all asbestos-containing products that you sold to each location from 1945 to 1980.
- (f) The amount of each asbestos product sold to each location during this period.
- (g) Please identify all documents relating to this distributor for the particular location.

ANSWER: See **Objection and Answer to Interrogatory No. 5. Without waiving any objections, this defendant responds that it did have competitors distributing products of the same manufacturers. However, this inquiry into the identity of these competitors would be more appropriately directed to the manufacturers of the products at issue.**

8.01 Has Defendant ever purchased asbestos-containing products from any other Defendant?

ANSWER: Yes.

8.02 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant from whom this Defendant purchased any asbestos-containing product;
- (b) list each product purchased from each co-Defendant;
- (c) list the dates of each purchase of asbestos-containing products from each co-Defendant.

ANSWER: See **Objection and Answer to Interrogatory Nos. 5 and 8.6.**

8.03 Has Defendant ever sold asbestos-containing products to any other Defendant?

ANSWER: See **Objection and Answer to Interrogatory No. 5.**

8.04 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant to whom this Defendant sold any asbestos-containing product;
- (b) list each product sold to each co-Defendant;
- (c) list the dates of each sale of asbestos-containing products to each co-Defendant.

ANSWER: See Objection and Answer to Interrogatory No. 5.

8.05 Has Defendant engaged in the manufacture and/or sale and/or distribution and/or marketing and/or supply and/or purchase and/or use of non-asbestos-containing products for use in connection with temperatures above 125° Fahrenheit since 1930? If so, please state:

- (a) the date such activity began;
- (b) the years during which such activity took place;
- (c) the date when such activity was terminated;
- (d) if such activity was terminated, the reason(s) why;
- (e) the geographical area into which you claim the product(s) were sold, purchased, or used;
- (f) identify the organizational unit of Defendant so engaged;
- (g) the site(s) at which each such product was manufactured;
- (h) the material components of each such product, giving specific or approximate percentage both by weight and by volume of each material component of each such product;
- (i) the temperature ranges for which each product(s) was intended to be used;
- (j) the product's generic name;
- (k) the product's trade or brand name;
- (l) the container in which the product was shipped (i.e., paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings which appeared on the product, as well as a description of the package used, the dates that type of package was used, and

any logos, product names, trademarks, etc. which appeared on the package;

- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

ANSWER: See Objection and Answer to Interrogatory No. 5. Without waiving any objections, this defendant has distributed non-asbestos containing products, including but not limited to fiberglass and mineral wool.

8.06 Did Defendant ever market or distribute any asbestos-containing product manufactured in whole or in part by someone else? If so, please state the following for each such product:

- (a) the name and address of the manufacturer;
- (b) the product's trade and brand name;
- (c) the organizational unit of Defendant who did so;
- (d) date(s) beginning, ending and during which the marketing or distributing took place;
- (e) whether the product was distributed through the same channels as those used for products manufactured by Defendant, and if not, please explain the exact channels of distribution;
- (f) identify all documents relating the marketing or distribution.

ANSWER: Objection. This interrogatory is overly broad, unduly burdensome, fails to specify any period of time, fails to specify any location and is harassing. Without waiving this objection, this defendant responds that it is impossible for it to determine precisely what products it has purchased and distributed in the past since it only retains record of such transactions for the past seven (7) years, and George V. Hamilton, Inc., has not distributed any asbestos-containing products for the past seven (7) years. However, George V. Hamilton, Inc. distributed certain asbestos containing products which were manufactured by other companies including Owens Corning Fiberglas, Owens-Illinois, Pittsburgh Corning Corporation, Eagle Picher Industries, Celotex Corporation, Keene Building Products, Baldwin Ehret Hill, and Philip Carey, among others. Because George V. Hamilton no longer has records of the purchase and/or distribution of asbestos containing products manufactured by these entities, it can not provide any additional information regarding these products.

8.1 Does Defendant have reason to believe that any of the asbestos-containing products listed in response to Interrogatory No. 5 were used at any of the sites listed on Exhibit A, attached hereto? If your answer is "yes", please state:

- (a) The basis of your answer.
- (b) Which of Defendant's asbestos-containing products listed in Interrogatory No. 5 were used at each job site listed on Exhibit A.

ANSWER: See **Objection and Answer to Interrogatory No. 5.**

8.2 For each company or business that Defendant knows may have marketed, distributed, installed, and/or sold those products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A:

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from 1950 to 1974.
- (e) Identify all documents relating to the sales to each such company.

ANSWER: See **Objection and Answer to Interrogatory No. 5. Withoput waiving any objections, this defendant states that it has no additional knowledge to that contained in the Answer to Interrogatory No. 5.**

8.3 If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed, distributed, installed and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of those companies, please state the following:

- (a) Name and address of each such company;
- (b) The dates of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt;

- (d) The names of the asbestos-containing products that Defendant marketed, distributed, and/or sold to each such company from 1950 to 1974.

ANSWER: N/A.

8.4 Does Defendant have records and/or any knowledge that reflects sales of their asbestos-containing products to any of the sites listed on Exhibit A, attached hereto? If so, please state the following as to each job site listed on Exhibit A:

- (a) The names and last known addresses of those people with such knowledge.
- (b) The location of such records.

ANSWER: See Objection and Answer to Interrogatory No. 5.

9. Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

- (a) The name and last known address of each such representative and whether they are still employed by Defendant;
- (b) The period of time they acted as your representative;
- (c) Their general responsibility as to each facility;
- (d) Whether that person is still alive; and
- (e) Any documents relating, referring or pertaining thereto.

ANSWER: See Objection and Answer to Interrogatory No. 5.

9.1 Identify all managers and sales personnel responsible for your sales or installation of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

ANSWER: See Objection and Answer to Interrogatory No. 5. Without waiving any objections, any of the following people may have been responsible for sales of insulation products in Ohio: Harry Hosfield, Al Demjan, Charles Conrad, Paul Hayes, Raymond McCormick, Paul Heil or Edward Kollar.

10. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products? If so, please state:

- (a) The name of each subdivision;
- (b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and
- (c) Whether said division or subsidiary conducted such business at any of the sites listed on Exhibit A from 1940 to 1975? If so, please state the following as to each job site listed on Exhibit A:
 - (1) The dates of such contracts;
 - (2) The specific asbestos-containing products that were used or removed in each contract.

ANSWER: Objection. This interrogatory is overly broad, unduly burdensome and harassing. Without waiving any objections, this defendant responds that it has never had divisions or subsidiaries. It did have a contracting unit, but it is impossible for it to determine with any specificity the work that it did or where this work took place or what products were used on any particular jobsite. The corporate record retention policy of George V. Hamilton, Inc. is that it only retains records of sales for the past seven (7) years and George V. Hamilton, Inc. has not distributed any asbestos-containing products for the past seven (7) years.

11. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

ANSWER: No.

12. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER: See Objection and answer to Interrogatory No. 5. Without waiving any objections, any information responsive to this interrogatory should be obtained from the manufacturer.

13. Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

- (a) The name of the company manufacturing the asbestos products under such agreement;

- (b) The trade name affixed to such products;
- (c) The periods of time covered by each such agreement;
- (d) The volume (in dollars amounts) of each such transaction;
- (e) The purchaser of such products;
- (f) Does Defendant currently have in its possession any of the writings or contracts concerning such rebranding agreement?

ANSWER: No.

13.1 Have you ever owned or operated a business or portion thereof which engaged in construction, erection or tear-out of furnaces, pipes, boilers, turbines, lehrs, ovens, kilns, etc? If so, please state:

- (a) the name of said business;
- (b) the date of commencing business and cessation of business, if applicable;
- (c) type of construction or tear-out performed;
- (d) state whether said business installed or supplied asbestos-containing products on the furnaces, pipes, boilers, turbines, lehrs, etc., i.e., gaskets, pipecovering, block, cement, rope, cloth, clothes, etc., containing asbestos, asbestos pipe, board, etc.;
- (e) state the trade name and/or manufacturer of any asbestos-containing product which you installed or supplied to any site on Exhibit A.
- (f) provide the dates for the applicable construction, installation or tear-out project.

ANSWER: See Objection and Answer to Interrogatory No. 10.

13.2 Do you have within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;

- (b) the present location and custodian of each such package;
- (c) the date or approximate date on which each such package was produced.

ANSWER: No.

14. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed above in answer to Interrogatory No. 5?

ANSWER: Not Applicable. George V. Hamilton, Inc. did not manufacture any asbestos-containing products.

15. As to each product listed in response to Interrogatory No. 5, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. In answering this question, give particular reference as to whether or not the materials were to be sawed or cut on the job, blown into confined areas, mixed with water in a cement or paste.

ANSWER: See Objection and answer to Interrogatory 5. Without waiving any objections, this defendant responds that the information responsive to this Interrogatory is unknown.

16. Based upon the material contents of the asbestos-containing products, the method of manufacturing, and the method of application, please state which products listed in Interrogatory No. 5 could be applied by a worker without creating dust.

ANSWER: Objection. This Interrogatory improperly assumes that has defendant has knowledge pertaining to the material, contents, method of manufacturing and method of application to those products referenced in Interrogatories 5, 8.02, 8.04, 8.06 and that all of the products created dust. Without waiving any objections, to the extent that George V. Hamilton, Inc. has knowledge, refer to Interrogatory No. 5.

17. Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the products listed in answer to Interrogatory No. 5? If so, please:

- (a) List each such written material or document;
- (b) Identify the person or persons presently in possession of each such document;

- (c) State where each such document is located.

ANSWER: See Objection and Answer to Interrogatory 5.

18. Prior to releasing the products listed in Interrogatory No. 5 for sale and usage, were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds that it was merely a supplier of products manufactured by others. As such, George V. Hamilton, Inc. has no knowledge regarding testing on products which manufacturers performed. Any knowledge relating thereto should be obtained from the manufacturer.

18.1 Prior to releasing any products for sale and usage (whether asbestos-containing or not), were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER: See Objection and Answer to Interrogatory No. 18.

19. Does Defendant have or control 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 listed in Interrogatory No. 5 hereinabove?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;
- (c) State where each such document is located.

ANSWER: **No.**

20. Were any design changes or modifications made as a result of such tests listed in answer to Interrogatory No. 18 hereinabove? If so, please state:

- (a) The trade name of the product changed or modified;
- (b) The nature of the change made and the date of such changes or modifications;
- (c) The name, address, and job classification of each person in charge of making a change.

ANSWER: **See Objection and Answer to Interrogatory No. 18.**

21. After releasing for sale, distribution or marketing the products listed in answer to Interrogatory No. 5, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials and/or products?

- (a) The names of the products tested and the dates of said tests;
- (b) The name, address, and job classification of each person and/or agency conducting said tests;
- (c) The results of said tests;
- (d) Whether, as a result of any tests conducted, any products were removed from the market;
- (e) The names of all products removed from the market as a result of said tests.

ANSWER: **See Objection and Answer to Interrogatory No. 18.**

22. Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

- (a) The dates and nature of such studies;
- (b) The names and addresses of persons conducting such studies;
- (c) The purpose of such studies;

- (d) Identify and list those persons to whom such reports were given and the date of such dissemination;
- (e) State any publication or other written dissemination of the results of such studies;
- (f) State the nature of any action to eliminate or minimize the inhalation of asbestos dust fibers; and
- (g) Attach a copy of reports based upon such studies.

ANSWER: See Objection and Answer to Interrogatory No. 18.

23. Before placing in the market the asbestos-containing products that Defendant, mined, manufactured, sold, marketed, installed or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

- (a) The date of said studies;
- (b) What studies were done; and
- (c) The titles of each study.

ANSWER: See Objection and Answer to Interrogatory No. 18.

24. Please state whether or not Defendant ever conducted or caused to be conducted any tests in the field (where asbestos-containing products were applied, removed or utilized) to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees, or other workers removing and/or tearing out asbestos-containing products, and/or other workers in the vicinity thereof? If so, please identify:

- (a) The date, place and nature of each and every test;
- (b) The particular asbestos-containing products to which each test applied;
- (c) The results of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site; and
- (d) The persons to whom the results said tests were given and the date of such dissemination.

ANSWER: See Objection and Answer to Interrogatory No. 18.

25. Please state whether or not Defendant ever obtained any knowledge concerning

the likelihood of asbestos being hazardous to human health. If so, please state:

- (a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;
- (b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained;
- (c) What information was disseminated within Defendant's company, or its subsidiary or predecessor regarding such adverse consequences or effects;
- (d) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- (e) The name, address and job classification of the custodian of such information.

ANSWER: Objection. This interrogatory is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence so far as it relates or refers to unidentified asbestos-containing products or materials. Further, this Interrogatory calls for an expert medical opinion or conclusion and, as phrased, calls for speculation as to "possible connection" or "likelihood". Further, the term "asbestos" is generically applied to several different minerals, may be found in various fiber types and may be found in a wide variety of product forms. Therefore, this interrogatory is overly general and non-specific as to the type of asbestos that was used in the products supplied by this defendant. Without waiving these objections, and subject to the above objections, this defendant responds: Yes.

- (a) Early 1970s.
- (b) This defendant first became aware of the claim that asbestos could be harmful when Carl Geier, who at the time was corporate secretary, attended a lecture by Dr. Irving Selikof.
- (c) Unknown.
- (d) No.
- (e) N/A.

26. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma, lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: Objection. This interrogatory is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence so far as it relates or refers to unidentified asbestos-containing products or materials. Further, this Interrogatory calls for an expert medical opinion or conclusion and, as phrased, calls for speculation as to "possible connection" or "likelihood". Further, the term "asbestos" is generically applied to several different minerals, may be found in various fiber types and may be found in a wide variety of product forms. Therefore, this interrogatory is overly general and non-specific as to the type of asbestos that was used in the products supplied by this defendant.

27. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: None.

28. As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

ANSWER: See Objection and Answer to Interrogatory 27.

29. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: No.

30. Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 and 1975.

ANSWER: None.

30.1 Please state whether Defendant, its medical officer or industrial hygienist or medical consultant or physicians were ever involved in testing or received literature or correspondence from the Mellon Institute.

ANSWER: No.

30.2 Has Defendant, or any engineer, industrial hygienist or physician in Defendant's employ, been a member in any professional group, trade group or any of the following groups:

American Ceramics Society
Asbestos Textile Institute
National Insulation Manufacturers Association
Thermal Insulation Manufacturers Association
Quebec Asbestos Mining Association
Asbestos Information Association
Industrial Health Foundation
Industrial Hygiene Foundation
Iron and Steel Institute
National Safety Counsel
Refractories Institute
Air Hygiene Foundation of America, Inc.
Sprayed Mineral Fiber Association
American Society of Mechanical Engineers

If the answer is yes, state the following:

- (a) The name of the group or groups in which Defendant or individual(s) were members;
- (b) The name and position individual(s) within the Defendant, as defined, who were members;
- (c) The years Defendant or individual(s) were members of the groups;
- (d) Whether Defendant paid the individual(s) dues or membership fees or reimbursed the individual(s) for dues or membership fees in the group.

ANSWER: **This defendant has never employed any engineer, industrial hygienist or physician.**

31. State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were

exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: None.

32. For each test described in Interrogatory No. 31, please give the name of the person conducting the test, the date of the test, and attach true copies of any documents, including but not limited to, reports, findings or memoranda concerning such tests or studies.

ANSWER: See Objection and Answer to Interrogatory No. 31.

33. Please state the year that Defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee/official of the company receiving such advice.

ANSWER: Unknown.

33.1 State whether Defendant at any time conducted, caused to be conducted, or had conducted on any job site, or at any of Defendant's plants or buildings, any air sampling, dust counts, dust observations, dust sampling tests or other activities to determine air quality. If your answer is in the affirmative, please indicate:

- (a) the date of any such air samples, tests, or activities;
- (b) by whom such activities were performed;
- (c) where such activities were performed;
- (d) the results of any such activities.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: No.

34. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;

- (c) The name(s) of the librarian(s) since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: No.

35. Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.

ANSWER: No.

36. When was Defendant first aware of reports of studies of the Trudeau Foundation at Saranac Lake, New York, entitled "Effects of the Inhalation of Asbestos Dust in the Lungs of Asbestos Workers" by A.J. Lanza, Assistant Medical Director published in the J. Public Health Report, Vol. 50, No. 1, dated January 4, 1935 ("Lanza Report")?

ANSWER: Never.

36.1 Did Defendant ever contract with Saranac Laboratories to study the hazards of any dust producing product manufactured by you (whether asbestos-containing or not)? If so, identify by date and author all documents concerning or any way related to such study.

ANSWER: George V. Hamilton, Inc. never manufactured any products and, therefore, the response to this Interrogatory is no.

36.2 Did Defendant ever contract with Saranac Laboratories to analyze dust or products? If so, identify by date and author all documents concerning or any way related to such analysis.

ANSWER: No.

37. Please state whether Defendant at any time has been a member of any "trade organization" or "trade association" composed of other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: **George V. Hamilton, Inc. has belonged to the Industrial Contractors Association of Pittsburgh, Eastern States Insulations Contractors Association, Central States Insulation Contractors, National Insulation Association, Sheet Metal Contractors Association. George V. Hamilton, Inc. has no other information pertaining to membership to these organizations.**

38. With respect to each trade organization or association listed in answer to Interrogatory No. 37, please state whether the minutes of the group's meetings and any correspondence between the members of such groups concerning the hazards of asbestos exposure are available.

ANSWER: **Unknown.**

39. Please identify by name the technical and trade association periodicals to which Defendant subscribed, and state whether Defendant had knowledge of any articles being printed, or withheld from printing, in said periodicals pertaining to the potential hazards of asbestos. If so, please state the following:

- (a) The title of each such article;
- (b) The periodical in which each such article was published;
- (c) The date each such article was published;
- (d) A detailed explanation of the reason for withholding any such article for printing;
- (e) Produce documentation which refers, alludes or mentions articles which were withheld for publication.

ANSWER: **George V. Hamilton, Inc. received The Asbestos Worker, which was published by the Asbestos Workers International Union and distributed to its members. George V. Hamilton, Inc. believes this may have contained articles pertaining to the potential hazards of asbestos.**

40. Please state whether, prior to 1975, Defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

ANSWER: See objection and Answer to Interrogatory No. 25.

41. As to each product listed in response to Interrogatory No. 5, please state whether Defendant, at any time, published and/or distributed any printed materials, including but not limited to brochures, pamphlets, catalogs, packagings or other written materials of any kind or character that contain any warnings, cautions, caveats or directions concerning the possible health effects of the products on a person. If so, please state as to each product:

- (a) The name of each relevant product;
- (b) The wording of each such warning;
- (c) A description of each such printed material;
- (d) The method used to distribute the warning to persons who are likely to use the products;
- (e) The date each such warning was issued;
- (f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
- (g) Please attach a copy of the warning and date said warning was issued;
- (h) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER: Objection. Refer to response to Interrogatory No 5. Without waving any objection, this defendant states that George V. Hamilton, Inc., did not publish any materials for distribution. The only such warnings, cautions, etc., which George V. Hamilton, Inc., provided to its customers were those which the manufacturers or prior suppliers of the products provided with the products. George V. Hamilton, Inc., did pass on sales materials published by the manufacturers to its customers, who were sophisticated purchasers with knowledge equal to or greater than George V. Hamilton, Inc.'s regarding the potential dangers of asbestos.

42. Has sales material been prepared by Defendant or its agents for purposes of

marketing or advertising the asbestos products listed in answer to Interrogatory No. 5? If so, please state:

- (a) The name and address of each person or entity who prepared same;
- (b) The name, address and job title of each person who presently has possession of same;
- (c) The date same was prepared;
- (d) The media used to disseminate the sales material.

ANSWER: See Answer to Interrogatory No. 41.

43. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 5 should be used or maintained by the ultimate user or those working in facilities or at job sites where the product was used, installed or removed, including, but not limited to, those sites listed on the job site list attached as Exhibit A? If so, please state the following:

- (a) The name, address and job classification of each person who prepared same;
- (b) The name, address and job classification of each person who presently has possession of same;
- (c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

ANSWER: See Objection and answer to Interrogatory No. 41.

44. Was any written material of any kind prepared by Defendant and distributed to those individuals listed in response to Interrogatory No. 9? If so, please state the following:

- (a) Identify the written material by content and date;
- (b) To whom was it delivered.

ANSWER: See Objection and answer to Interrogatory No. 41.

45. Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or

applying same? If so, please state the following:

- (a) The date that Defendant first determined that another product could be used in place of asbestos;
- (b) The chemical of the substitute;
- (c) Whether the substitute is suitable for the purpose for which they are to be used;
- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER: Objection. This Interrogatory is argumentative, overly broad unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because this Interrogatory relates to products not manufactured by this defendant, about which this defendant cannot be expected to be knowledgeable. Without waiving this objection, this defendant denies that its products posed a potential health hazard to those working with these products. Further, since this defendant never manufactured any products, including any which may have contained asbestos, it does not have sufficient expertise to further respond to this Interrogatory.

46. Did Defendant give any warnings to any individuals at the sites listed on Exhibit A, including any individuals who owned, operated, or managed the facilities at the sites listed on Exhibit A, regarding the potential health hazards of any product listed in response to Interrogatory No. 5. If yes, please state:

- (a) Name of person most knowledgeable about this communication.
- (b) Name of person at the sites listed on Exhibit A, attached hereto most knowledgeable about this communication.
- (c) Dates of each communication.
- (d) Contents of each communication.

ANSWER: See Objection and answer to Interrogatory No. 41.

47. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
- (b) The disease alleged in each such claim;

- (c) A brief summary of the disposition of each such claim; and
- (d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: No.

47.1 Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

ANSWER: N/A. George V. Hamilton, Inc. never manufactured any asbestos-containing products.

47.2 Has any person or company from which you purchased asbestos-containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: No.

47.3 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

ANSWER: N/A. George V. Hamilton, Inc. never manufactured any asbestos-containing products. George V. Hamilton, Inc. is a distributor.

47.4 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;
- (b) state when such action was taken;
- (c) state what written material exists related to such action;
- (d) state the names, job titles and last known address of the individuals who undertook such actions.

ANSWER: This interrogatory is overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, this defendant responds: refer to Answer to Interrogatory No. 41.

48. Did Defendant receive notice prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please 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 representing the individuals making such claims;
- (f) The style and court number of each such claim;
- (g) The resolution of each claim.

ANSWER: No.

48.1 Describe the method by which you have maintained records concerning the manufacture, sale, supply, distribution, use, advertising, delivery and/or installation or tear-out of each of asbestos-containing products. For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g., boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacture, sale, supply, distribution, use, advertising, delivery, and/or installation or tear-out which such record keeping system covers;

- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

ANSWER: See Introductory Statement/Objections. By way of further answer and without waiving any objections, the corporate record retention policy of George V. Hamilton, Inc., is that it only retains records of sales and/or contracts for the past seven (7) years, and George V. Hamilton, Inc., has not sold, distributed, or installed any asbestos-containing products for the past seven (7) years. The records custodians for George V. Hamilton, Inc. have been:

Prior to 1970	Chuck Conrad (deceased)
1970 - 1985	Edward Kollar
1985 - Present	Mike Wallace

48.2 State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

ANSWER: See Objections and Answer to Interrogatory 48.1.

48.3 For all documents, other than invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER: No index has ever been maintained.

48.4 For all invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER: See Objections and Answer to Interrogatory 48.3.

49. Has Defendant obtained statements from any witnesses including Plaintiffs? If so, please:

- (a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER: None other than deposition or affidavits obtained through discovery which has been available to all parties.

50. Do you contend that Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set forth in detail in what respect the product was improperly used.

ANSWER: Defendant is unable to respond to this Interrogatory at the present time. Discovery is still ongoing. Once discovery is complete, defendant will determine whether this contention will be asserted.

51. As to the sites listed on Exhibit A, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other than asbestos which contributed to or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- (a) The facts upon which you rely;
- (b) The identity of the sources upon which you rely which substantiate these facts.

ANSWER: Discovery with regard to this issue is ongoing. However, it is asserted that other factors do exist including, but not limited to, tobacco use, alcohol use, hereditary disposition and exposure to chemicals, radiation and other toxins in and out of the workplace.

52. Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so,

state:

- (a) When the respirator was sold;
- (b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- (c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers;
- (d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;
- (e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

ANSWER: Objection. This Interrogatory is argumentative and harassing. Without waiving this objection, it is believed that certain manufacturers have represented that their respirators would meet these requirements. This information is equally available to plaintiff's counsel from these manufacturers.

53. Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

- (a) Their identity and last known address;
- (b) The subject matter on which the expert is expected to testify;
- (c) The expert's specific conclusion and specific opinions and the specific basis therefore;
- (d) The expert's qualifications to render the opinions set forth above;
- (e) Whether any person identified in sub-paragraph (a) above has provided a report or other documentation to you, and if so, identify such document or report;
- (f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and
- (g) Describe in detail the education and work history of, and identify any books, treaties, article, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to sub-paragraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.

ANSWER: This defendant has not yet determined what experts it will call at the trial of this matter. George V. Hamilton, Inc. intends to call expert witnesses in a number of disciplines who will testify regarding the medical, epidemiology, industry hygiene, causation, damages and other aspects of this lawsuit. These experts will be identified as

required by the Court's Case Management Order which is applicable to this matter.

54. Please state the name and last known address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

ANSWER: Objection. This Interrogatory is unintelligible as written. If Plaintiff is attempting to ask whether any employee of George V. Hamilton, Inc. will testify as an expert at trial, the response is: no.

55. Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

ANSWER: Yes.

55.1 For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, or the cross-claims or counter-claims of any party against Defendant, state:

- (a) the facts upon which Defendant relies for each and every affirmative defense;
- (b) each and every document which will be offered to prove each and every affirmative defense; and
- (c) each and every witness who will testify in support of each and every affirmative defense.
- (d) the substance and subject matter of the anticipated testimony of each witness identified in the preceding response.

ANSWER: Discovery with regard to this defendant's affirmative defenses is ongoing. Further, the Defendants are not required to identify witnesses or documents until the appropriate time under the Court's Case Management Order. This Information will be provided to Plaintiff pursuant to this Case Management Order.

56. Does Defendant have policies of insurance that might cover the claims that have been made by Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

ANSWER: The Pennsylvania Manufacturers Association Insurance Company (hereinafter "PMA") and American States policies each have a policy limit of \$500,000 per occurrence and per annual aggregate, and the American Insurance policy has a \$1,000,000 limit per occurrence and per annual aggregate.

<u>COMPANY</u>	<u>POLICY NUMBER</u>	<u>POLICY DATES</u>
American States Insurance Co.	01-AM 19007	7/1/84-1/30/85
American Insurance Co.	MXP 3044242	7/1/77-79
PMA	3076003446028	7/1/76-77
PMA	3075003446028	7/1/75-76
PMA	3074003446028	7/1/74-75
PMA	3073003446028	7/1/73-74
PMA	3072003446028	7/1/72-73
PMA	3071003446028	7/1/71-72
PMA	3070003446028	7/1/70-71
PMA	3069003446028	7/1/69-70
PMA	3068003446028	7/1/68-69
PMA	3067003446028	7/1/67-68
PMA	3066003446028	7/1/66-67
PMA	3065003446028	7/1/65-66
PMA	30643446028	7/1/64-65
PMA	30633446028	7/1/63-64

56.1 Has Defendant ever been involved in any litigation concerning potential insurance coverage for asbestos products liability matters? If so, please state:

- (a) the case caption, court and date of filing of each case in which you have been involved;
- (b) whether you were Plaintiff or Defendant;
- (c) a brief statement of the issues;
- (d) identify by date, author and recipient(s), (including recipients of carbon copies) all documents listed as exhibits by either party in this litigation;
- (e) identify by deponent and date all individuals who were deposed in these cases;
- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;

- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

ANSWER: Yes.

- Association
Pennsylvania,
- (a) **George V. Hamilton, Inc. vs. Pennsylvania Manufacturer's Insurance Company, Court of Common Pleas of Allegheny County, docket number GD 91-19916, November 7, 1991.**
 - (b) **Plaintiff.**
 - (c) **Duty to defend and indemnify.**
 - (d) **None.**
 - (e) **None.**
 - (f) **None.**
 - (g) **None.**

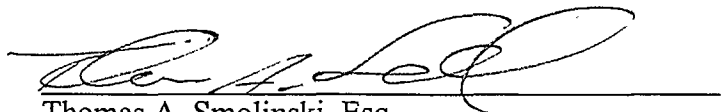
57. Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

ANSWER: **Objection. This Interrogatory is overly broad and unduly burdensome. Without waiving any objections, this defendant answers that it is unaware at the present time of who may have knowledge of relevant facts regarding claims and defenses of this lawsuit other than the plaintiffs, family members, other defendants and co-workers of the plaintiff/decedent. Discovery is ongoing in this matter. This defendant will provide this information, if any, as required by the Court's Case Management Order which is applicable to this matter.**

58. State the last date that Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

ANSWER: 1972.

Respectfully submitted,



Thomas A. Smolinski, Esq.
Pro Hac Vice
Counsel for Defendant, George V. Hamilton, Inc.

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Pittsburgh, PA 15237
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EXHIBIT A
BARON & BUDD SITE LIST

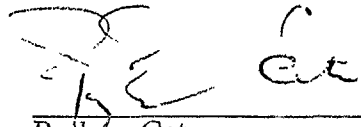
Queen City Steel, Cincinnati, Ohio
Ford Motor Company, Sharonville, Ohio

VERIFICATION

I, Rodney Gates, verify that the facts set forth in this Answers to Plaintiff's Set of Master Interrogatories are true and correct to the best of knowledge, information and belief.

I am authorized to make this verification on behalf of George V. Hamilton, Inc. because of my position as President.

Date: 1/13/03



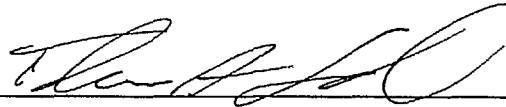
Rodney Gates

CERTIFICATE OF SERVICE

The undersigned certifies an exact copy of the foregoing has been served on Plaintiff's counsel by first class U.S. mail to:

Laura M. Cabutto, Esquire
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, Texas 75219-4281

A notice of service of the foregoing document has been electronically filed on CLAD on this the 21st day of January, 2003.



Thomas A. Smolinski, Esquire

JAN 24 03 *070060
WILLMAN & ARNOLD LLP

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GENE E. ARNOLD

January 21, 2003

Laura M. Cabutto, Esquire
Baron & Budd
3102 Oak Lawn Avenue
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Dallas, Texas 75219-4281

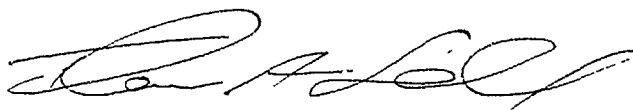
Re: **Ruth Dickerson, Personal Representative of the Estate of Eldon
Claude Dickerson, et al. v. George V. Hamilton, Inc.**
Court of Common Pleas, Cuyahoga County, Ohio No. 398302

Dear Laura:

Enclosed please find defendant George V. Hamilton, Inc.'s Answers to Plaintiff's Master Set of Interrogatories and Request for Production of Documents.

As always, if you should have any questions, or if I may be of any assistance, please do not hesitate to contact me.

Very truly yours,



Thomas A. Smolinski

TAS/kmk
Enclosure