

CAUSE NO. A-134,614

FRENCH HICKS, ET AL. § IN THE DISTRICT COURT OF
 §
 §
VS. § JEFFERSON COUNTY, TEXAS
 §
 §
BETHLEHEM STEEL CORPORATION, §
ET AL. § 58TH JUDICIAL DISTRICT

DEFENDANT'S ANSWERS TO PLAINTIFFS'
NOVEMBER, 1990 INTERROGATORIES

To: Plaintiffs, and their attorney of record, JOSEPH C.
BLANKS, of Reaud, Morgan & Quinn, 909 Laurel Street,
Beaumont, Texas, 77701:

COMES NOW ETHYL CORPORATION, Defendant in the above-
entitled and numbered cause of action, and would make and
file this its Answers to Plaintiffs' Interrogatories as
follows:

SEE ATTACHED.

Respectfully submitted,

HAYS, McCONN, PRICE
& PICKERING

By


B. STEPHEN RICE

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ORGAIN, BELL & TUCKER*

By D. Allan Jones
D. ALLAN JONES
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Attorneys for Defendant,
ETHYL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been sent certified mail, return receipt requested and/or hand delivery to Joseph C. Blanks, of Reaud, Morgan & Quinn, 909 Laurel Street, Beaumont, Texas 77701 and all other known counsel of record on this the 12th day of DECEMBER, 1990.

B. STEPHEN RICE

*Signed by permission

082L/97

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GENERAL OBJECTION

Defendant objects to these interrogatories on the basis that they are overly broad and not limited in geographic scope to the plants located along the Texas Gulf Coast in which the Plaintiffs claim to have been exposed to asbestos.

INTERROGATORIES

NOTE: Pursuant to the agreement of the parties, these interrogatories are construed to apply only to the original construction of the subject premises and to the general contractor and insulation contractor for the original construction.

1. State in which years the subject premises owned or ever owned by you were constructed.

ANSWER: 1951-1952.

2. Identify the general contractor for the construction of your subject premises.

ANSWER: C.F. Brown.

3. Identify the insulation contractor for the initial construction of your subject premises.

ANSWER: Unknown.

082L/92

STATE OF LOUISIANA §
 §
PARISH OF EAST BATON ROUGE §

BEFORE ME, the undersigned authority, on this day there personally
appeared

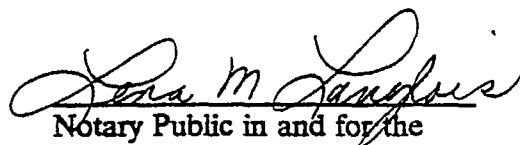
David C. Bach,

who, after first being duly sworn by me, did depose and state that he is the Assistant
Counsel for Ethyl Corporation, a Defendant in the above styled and numbered cause, that
based upon information and belief, the above and foregoing Answers to Plaintiffs'
Interrogatories are true and correct.



David C. Bach

SWORN TO and SUBSCRIBED, before me, this 7th day of December, 1990.



Notary Public in and for the
State of Louisiana
My commission is for life.

LENA M. LANGLOIS
NOTARY PUBLIC
EAST BATON ROUGE PARISH, LA.
MY COMMISSION IS FOR LIFE.