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ATTORNEYS FOR DEFENDANT
 GOULDS PUMPS, INC.

SUPERIOR COURT OF CALIFORNIA

IN AND FOR THE COUNTY AND CITY OF SAN FRANCISCO

In re: COMPLEX ASBESTOS LITIGATION) No.: 828684

RAYINALDO RAIGOZA and EUGENA
 RAIGOZA

Plaintiffs,

v.

ASBESTOS DEFENDANT (BHC) As
 Reflected on Exhibit B, C and H, and
 DOES 1-800.

Defendants.

Case No.: 303643

**GOULDS PUMPS, INC. RESPONSES TO
 PLAINTIFFS' STANDARD
 INTERROGATORIES TO ALL
 DEFENDANTS**

Pursuant to California Code of Civil Procedure, defendant Goulds Pumps, Inc., in response to Standard Interrogatories to All Defendants, answers as follows. Defendant objects to any interrogatory which requests disclosure of attorney-client or attorney work product or similarly privileged information.

INTERROGATORY NO. 1:

IDENTIFY the person verifying these answers on YOUR behalf.

RESPONSE TO INTERROGATORY NO. 1:

Rob Molloy, Environmental Safety & Health Manager, Goulds Pumps, Inc., 240 Fall Street, Seneca Falls, NY 13148.

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1 **INTERROGATORY NO. 2:**

2 State the date of first employment with YOU, and the dates and titles of each job
3 position the person verifying these interrogatories has held while employed by YOU.

4 **RESPONSE TO INTERROGATORY NO. 2**

5 June, 1998

6 **INTERROGATORY NO. 3:**

7 State whether or not YOU are a corporation, and if so, state:

8 A. YOUR correct corporate name;

9 B. YOUR state of incorporation;

10 C. The date of YOUR incorporation;

11 D. The address of YOUR principal place of business;

12 E. Whether or not YOU have ever held a certificate of authority to do business in
13 the State of California, and if so, the inclusive dates of any certificate;

14 F. If YOU are wholly owned or the majority interest of YOUR company is owned
15 by another business entity, state the entity's name and principal place of business;

16 G. Whether YOU have any business offices in California, and, if so, YOUR
17 principal place of business in California

18 **RESPONSE TO INTERROGATORY NO. 3:**

19 A. Goulds Pumps, Inc.

20 B. Goulds Pumps, Inc. was incorporated in Delaware.

21 C. Goulds Pumps was founded in 1848 in New York, and was reincorporated in
22 Delaware in 1985.

23 D. ITT Fluid Technology Corp., Midland Park, New Jersey.

24 E. We do not know what you mean 'certificate of authority. Goulds Pumps, Inc.
25 does business in California.

26 F. In 1997 the stock of Goulds Pumps, Inc. was fully acquired by ITT Industries,
27 Inc. and Goulds Pumps, Inc. was merged into ITT Industries, Inc. Goulds Pumps, Inc. now
28 functions as part of ITT Fluid Technology Corp.

1 G. Goulds Pumps Vertical Products Operations has an office in the City of
2 Industry, Goulds Pumps has a sales office in Diamond Bar, Goulds Pumps, Inc. does not have
3 a 'principal place of business' in California.

4 **INTERROGATORY NO. 4:**

5 Have YOU ever been identified, known, or done business under any other name in the
6 State of California?

7 **RESPONSE TO INTERROGATORY NO. 4:**

8 Yes.

9 **INTERROGATORY NO. 5:**

10 If your answer to Interrogatory No. 4 is in the affirmative, please state such name or
11 names and the time period during which THIS DEFENDANT was so known or identified.

12 **RESPONSE TO INTERROGATORY NO. 5:**

13 Goulds Pumps Inc.

14 **INTERROGATORY NO. 6:**

15 If YOU are not a corporation, what is YOUR business structure (partnership, joint
16 venture, sole proprietorship, etc.).

17 **RESPONSE TO INTERROGATORY NO. 6:**

18 Not applicable.

19 **INTERROGATORY NO. 7:**

20 If YOU are not a corporation, please IDENTIFY all persons or other entities with an
21 ownership interest in YOU.

22 **RESPONSE TO INTERROGATORY NO. 7:**

23 Not applicable.

24 **INTERROGATORY NO. 8:**

25 If you are not a corporation, please state the following:

26 A. The address where the HISTORICAL RECORDS of THIS DEFENDANT are
27 currently located; and

28 ///

1 B. The name, job title and current address of the Custodian for THIS
2 DEFENDANT'S HISTORICAL RECORDS.

3 As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating
4 to the formation of THIS DEFENDANT, all minutes of partners', general partners', or other
5 owners' meetings, and all DOCUMENTS relating to THIS DEFENDANT's merger with,
6 acquisition of or purchase, or sale of or by any other COMPANY.

7 **RESPONSE TO INTERROGATORY NO.8:**

8 Not applicable.

9 **INTERROGATORY NO. 9:**

10 IDENTIFY your custodian of Business Records.

11 **RESPONSE TO INTERROGATORY NO.9:**

12 There is no one person who is the 'custodian of Business Records'. The identity of a
13 custodian would depend on the type of record.

14 **INTERROGATORY NO. 10:**

15 IDENTIFY the person or persons most knowledgeable about:

16 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS CONTAINING
17 PRODUCTS;

18 B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING
19 PRODUCTS;

20 C. YOUR contracting with others to do work involving use or handling of RAW
21 ASBESTOS or ASBESTOS CONTAINING PRODUCTS.

22 **RESPONSE TO INTERROGATORY NO. 10:**

23 A. Goulds Pumps, Inc. did not use RAW ASBESTOS. Goulds Pumps designed
24 and manufactured pumps, some of which used case gaskets and packing that contained
25 asbestos. William Goodman has some knowledge about Goulds historical design and
26 manufacture. Due to the passage of time Goulds Pumps is unable to identify with certainty
27 employees knowledgeable about the acquisition of asbestos-containing case gaskets and
28 packing from other manufacturers dating back decades

1 B. William Goodman, Manager Order Engineering, is knowledgeable concerning
2 the marketing and sale of pumps that may have used asbestos-containing case gaskets and
3 packing.

4 C. We do not understand this question, and do not believe it is applicable. Upon
5 information and belief, Goulds Pumps, Inc. did not contract with others to do work involving
6 use or handling of either RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS.

7 **INTERROGATORY NO. 11:**

8 For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING
9 PRODUCTS, state the IDENTITY of physicians, medical directors and/or industrial
10 hygienists employed by YOU during the time frame or prior to the time YOU discontinued
11 the marketing of such products. All other DEFENDANTS need only respond as to medical
12 directors and/or industrial hygienists or physicians employed in the area of employee health
13 and safety. PREMISES owners and domestic corporations need only respond as to the United
14 States.

15 **RESPONSE TO INTERROGATORY NO. 11:**

16 Goulds Pumps did not have a medical director. At certain points in time Goulds
17 Pumps retained the services of outside physicians to review disability claims, compensation
18 claims and to conduct pre-employment drug screenings. The physicians known to Goulds'
19 are:

20 Dr. Saul Towers (1970 - mid-1980s)

21 Dr. Monokosfky (mid-1980s to 1990)

22 **INTERROGATORY NO. 12:**

23 Has any employee of THIS DEFENDANT testified by deposition or a trial on behalf
24 of THIS DEFENDANT in a third-party case, in which THIS DEFENDANT was a party,
25 wherein the plaintiff has alleged an asbestos-related injury? If so, for each such third-party
26 case (except that Premises Defendants and Contractor Defendants need answer only with
27 respect to cases relating to sites within the GEOGRAPHIC AREA) please state:

28 A. The caption and case number;

- B. The court filing including state and county;
- C. The date of deposition or trial testimony;
- D. The name and address of plaintiff's counsel of record;
- E. The name and address of the court reporter.

RESPONSE TO INTERROGATORY NO. 12:

- A. *Hall v. Armstrong World Industries, et. al.* No. L-4101-93
- B. Superior Court of New Jersey, Middlesex County
- C. March 29, 1995
- D. Wilentz, Goldman & Spitzer – address unknown
- E. Brody & Geiser, 77 Hamilton Avenue, Fords, New Jersey
- A. *Williamson v. Goulds Pumps, et. al.*, L-9063-90
- B. Superior Court of New Jersey, Middlesex County
- C. May 16, 1991
- D. Garruto, Galex & Cantor, P.C. - address unknown.
- E. Middlesex Reporting, 11 River Drive, Marlboro, New Jersey

INTERROGATORY NO. 13:

For each of the following, please state whether, at any time within the time frame or until such time as any defendant which had been engaged in MARKETING RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS discontinued the MARKETING of such products, THIS DEFENDANT was a member or paid dues for any representative of THIS DEFENDANT (excluding faculty members of educational institutions) to be a member of the following:

- A. American Conference of Governmental Industrial Hygienists;
- B. American Industrial Hygiene Association;
- C. American Petroleum Institute;
- D. American Railroad Association;
- E. Asbestos Cement Producers Association;

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1 F. Asbestos Information Association (AIA) (please answer through date of your
2 answers);

3 G. Asbestos Information Association/North America (AIA/NA) (please answer
4 through the date of your answers);

5 H. Asbestos Textile Institute (ATI);

6 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);

7 J. Industrial Mineral Insulation Manufacturers Institute;

8 K. Magnesita Insulation Manufacturers Association;

9 L. Magnesita Silica Insulation Manufacturers Association;

10 M. Mineral Wool Institute;

11 N. National Insulation Manufacturers Association (NIMA);

12 O. National Safety Council;

13 P. New York Academy of Sciences;

14 Q. Quebec Asbestos Mining Association (QAMA);

15 R. Refractories Institute;

16 S. Safe Building Alliance (please answer through date of your answers);

17 T. Thermal Insulation Manufacturers Association (TIMA);

18 U. U.S. Maritime Commission;

19 V. IDENTIFY any other organizations, associations or groups of manufacturers,
20 miners, distributors, importers, labelers, suppliers, and/or sellers of ASBESTOS-
21 CONTAINING PRODUCTS of which THIS DEFENDANT was a member;

22 W. IDENTIFY any such representative of THIS DEFENDANT.

23 **RESPONSE TO INTERROGATORY NO. 13:**

24 Upon information and belief, Goulds Pumps was not a member of the listed
25 organizations. It is likely that one or more employees on their own were members of the
26 American Petroleum Institute.

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INTERROGATORY NO. 14:

For each organization, association or other entity identified in YOUR Response to Interrogatory No. 13, please state:

A. The dates during which THIS DEFENDANT was a member;

B. The name(s) of any publication(s) received by THIS DEFENDANT from such association or organization;

C. The name of any committee or subcommittee of which THIS DEFENDANT was a member, and the dates of such committee or subcommittee membership.

RESPONSE TO INTERROGATORY NO. 14:

Not applicable.

INTERROGATORY NO. 15:

Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of New Jersey relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

C. State the IDENTITY of the custodian of such DOCUMENTS.

D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

RESPONSE TO INTERROGATORY NO. 15:

No.

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INTERROGATORY NO. 16:

Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies and/or tests conducted by an insurance company, including but not limited to Metropolitan Life Insurance Company and Aetna Insurance relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS:

C. State the IDENTITY of the custodian of such DOCUMENTS.

D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a DEFENDANT hospital or DEFENDANT's library providing access to the general public.

RESPONSE TO INTERROGATORY NO. 16:

No.

INTERROGATORY NO. 17:

Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or conclusions of any studies and/or tests conducted by any laboratory, including but not limited to, the Saranac Laboratory relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

1 C. State the IDENTITY of the custodian of such DOCUMENTS.

2 D. This interrogatory does apply to DOCUMENTS contained in a library
3 maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to the
4 general public.

5 **RESPONSE TO INTERROGATORY NO. 17:**

6 No.

7 **INTERROGATORY NO. 18:**

8 Had THIS DEFENDANT (except for a defendant that is an educational Institution)
9 prior to 1973 ever maintained a library (or libraries which contained books, articles,
10 periodicals, journals, and/or reference materials that related to the subjects of asbestos,
11 industrial hygiene, medicine, safe and/or occupational disease. If so, state:

12 A. The date each such library was established;

13 B. The location of each such library;

14 C. The IDENTITY of each librarian or other person in charge of such library.

15 **RESPONSE TO INTERROGATORY NO. 18:**

16 No. Goulds Pumps has never maintained medical libraries, except as may have been
17 used by Goulds Pumps at its Plant Hospital in Seneca Falls, New York.

18 **INTERROGATORY NO. 19:**

19 With the exception of OSHA compliance, had THIS DEFENDANT (except for a
20 defendant that is an educational institution) prior to 1980 exchanged DOCUMENTS or
21 communicated with a person or other COMPANY expressly regarding the results of tests
22 and/or studies relating to asbestos exposure in the workplace or the human health
23 consequences of exposure to asbestos? If so, state:

24 A. Each person or COMPANY with whom the information was exchanged or to
25 whom it was communicated.

26 B. The date(s) of any such exchanges or communications;

27 C. The IDENTITY of the custodian of such DOCUMENTS.

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1 **RESPONSE TO INTERROGATORY NO. 19:**

2 No

3 **INTERROGATORY NO. 20:**

4 Has any employee or designee of THIS DEFENDANT testified as a representative of
5 THIS DEFENDANT before the Occupational Safety and Health Administration, the National
6 Institute of Occupational Safety and Health, or any committee or subcommittee of the United
7 States Congress relating to asbestos exposure in the workplace or the human health
8 consequences of exposure to asbestos? If so, please state:

- 9 A. The entity before whom such testimony was given;
10 B. The date(s) and location(s) of such testimony;
11 C. The IDENTITY of the individual(s) who so testified;
12 D. Whether any DOCUMENTS were presented to the entity before which
13 testimony was given
14 E. Whether copies of DOCUMENTS presented were retained by THIS
15 DEFENDANT and, if so, state the IDENTITY of the custodian of such DOCUMENTS.

16 **RESPONSE TO INTERROGATORY NO. 20:**

17 No

18 **INTERROGATORY NO. 21:**

19 Has THIS DEFENDANT (except for a defendant that is an educational institution)
20 conducted, or caused to be conducted, tests, and/or studies of ambient asbestos dust created
21 during the manufacture, processing and/or assembling for sale of ASBESTOS-
22 CONTAINING PRODUCTS? If so, state:

- 23 A. Each manufacturing facility, including location and address, at which any such
24 test and/or study was conducted;
25 B. The date of each such test and/or study;
26 C. The individual(s) or entity conducting each such test and/or study;
27 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results
28 and/or conclusions of each such study;

1 E. The IDENTITY of the custodian of such DOCUMENTS.

2 **RESPONSE TO INTERROGATORY NO. 21:**

3 No

4 **INTERROGATORY NO. 22:**

5 Has THIS DEFENDANT (except for a defendant that is an educational institution)
6 conducted, or caused to be conducted, any tests and/or studies on ambient asbestos dust levels
7 at any location or job site where ASBESTOS-CONTAINING PRODUCTS were installed,
8 utilized or removed? If so, for the first 5 tests and/or studies, state:

9 A. The location, including name and address, at which each such test and/or study
10 was conducted;

11 B. The individual(s) or entity conducting each such test and/or study;

12 C. The date of each such test and/or study;

13 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results
14 and/or conclusions of each such test and/or study;

15 E. The IDENTITY of the custodian of such DOCUMENTS.

16 **RESPONSE TO INTERROGATORY NO. 22:**

17 No.

18 **INTERROGATORY NO. 23:**

19 Did THIS DEFENDANT (except for a defendant that is an educational institution)
20 have any laboratory or other similar type of facility anywhere in the United States at which it
21 conducted, or caused to be conducted, any tests and/or studies of ASBESTOS-CONTAINING
22 PRODUCTS or RAW ASBESTOS relating to the health consequences of asbestos or the dust
23 generated by any use of asbestos or ASBESTOS-CONTAINING PRODUCTS. If so, state:

24 A. The location, including name and address, at which each test and/or study was
25 conducted;

26 B. The individual(s) or entity conducting each such test and/or study;

27 C. The date of each such test and/or study;

28 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results

1 and/or conclusions of each such test and/or study;

2 E. The IDENTITY of the custodian of such DOCUMENTS.

3 **RESPONSE TO INTERROGATORY NO. 23:**

4 No.

5 **INTERROGATORY NO. 24:**

6 Has THIS DEFENDANT made available to its employees a medical examination
7 program to determine the absence or presence of asbestos-related disease? If so, state:

8 A. Whether chest x-rays or pulmonary function tests were part of such program(s);

9 B. Whether participation in any such program was a mandatory condition of
10 employment or was voluntary;

11 C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);

12 D. The IDENTITY of the custodian of such DOCUMENTS.

13 **RESPONSE TO INTERROGATORY NO. 24:**

14 Goulds has a program available to its employees to test for cardio-pulmonary function
15 but the program is not for asbestos-related disease.

16 **INTERROGATORY NO. 25:**

17 Prior to 1973, did any person file a Workers Compensation claim for asbestos-related
18 injury against THIS DEFENDANT or against any Workers? Compensation insurance carrier
19 which provided coverage for THIS DEFENDANT? If so, state the total number of such
20 claims and, for the first 20 such claims state:

21 A. The date of such claim;

22 B. The name of the claimant;

23 C. The case number;

24 D. The court in which the claim was filed;

25 E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS
26 evidencing such claims.

27 **RESPONSE TO INTERROGATORY NO. 25:**

28 No.

INTERROGATORY NO. 26:

Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in asbestos-related personal injury lawsuits? If so, state:

A. The name and principal place of business of any insurance carrier who has issued such policy of insurance;

B. The number and effective date of each policy;

C. The amount(s) of coverage of each policy;

D. The applicable dates of coverage.

RESPONSE TO INTERROGATORY NO. 26:

A. Utica Mutual Insurance Company, New Hartford, New York.

B. Goulds had insurance with Utica for a number of years. Generally, those were occurrence policies for primary coverage and had an annual renewal.

C.-D. The policy limit of \$500,000 was increased to \$1 million in 1985. There was an asbestos exclusion on policy renewals beginning 1986. CIGNA is the current carrier as of January 1, 1998.

INTERROGATORY NO. 27:

State whether YOU have controlled, purchased, or in any way acquired any controlling interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold, supplied, distributed and/or otherwise placed RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce. If so, state:

A. The name and address of said corporation or business entity;

B. The dates YOU controlled, purchased or acquired any interest; and

C. The nature of the business as it pertains to asbestos.

RESPONSE TO INTERROGATORY NO. 27:

Goulds Pumps did not purchase or any corporation or business entity which mined manufactured, produced, processed, compounded sold, supplied or distributed asbestos or asbestos containing products. Goulds Pumps may have acquired pump manufacturers, some

of which used case gaskets and/or packing that contained asbestos.

INTERROGATORY NO. 28:

State whether THIS DEFENDANT, between 1930 and 1985, has ever engaged in the following activities with regard to RAW ASBESTOS, and if so, state the inclusive dates of such activity:

- A. Mining;
- B. Milling;
- C. Supply;
- D. Importing;
- E. Processing;
- F. Distribution;
- G. Marketing;
- H. Sale;
- I. Brokering.

RESPONSE TO INTERROGATORY NO. 28:

(A. - I.) No.

INTERROGATORY NO. 29:

If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the affirmative, state:

A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or MARKETED in any form or quantity between 1930 and 1985;

B. The date(s) such RAW ASBESTOS was first placed on the market, including the date(s) such RAW ASBESTOS was first marketed;

- 1. On an experimental basis;
- 2. On a test basis;
- 3. For sale.

C. The date(s) such RAW ASBESTOS:

- 1. Ceased to be produced; or

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2. Was recalled from the market, if ever.

D. A description of the chemical composition of such RAW ASBESTOS, including the type and/or grade of asbestos;

E. A description of the physical appearance and nature of such RAW ASBESTOS, including any color coding, distinctive marking and/or logo on the packaging or container;

F. A detailed description of the intended use of such RAW ASBESTOS, including any temperature limits for each such use;

G. Whether such RAW ASBESTOS was on the U.S. Government's 'Qualified Products List,' and if so, the inclusive dates it was on such list;

H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold. As to each such, state:

I. Whether any of THIS DEFENDANT's RAW ASBESTOS has, at any time, been sold, shipped, or otherwise distributed, used or installed to or at any COMPANY (including power company or utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS DEFENDANT's RAW ASBESTOS has at any time, been sold to any manufacturer, or manufacturing facility, of ASBESTOS-CONTAINING PRODUCTS. If so, state:

1. The names of each such COMPANY, governmental agency or entity, shipyard, distributor, supplier, manufacturer or refinery;

2. The inclusive dates of each such sale, and the amount (quantity) and the trade brand name of such RAW ASBESTOS sold;

3. The manner of shipment (e.g. boat, rail, etc.)

4. Whether you have any records indicating any such sale or shipment and, if so, the name, address and job classification of each person who currently has possession of such records.

5. Either (1) attach all DOCUMENTS evidencing the information sought

1 in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach
2 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity
3 that they may be made the subject of a request for production of documents.

4 **RESPONSE TO INTERROGATORY NO. 29:**

5 Not applicable.

6 **INTERROGATORY NO. 30:**

7 Between 1930 and 1985, did YOU ever engage in any of the activities listed below
8 with regard to ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of
9 such activity:

- 10 A. Supply;
11 B. Importing;
12 C. Distribution;
13 D. Marketing;
14 E. Sale;
15 F. Labeling;
16 G. Manufacturing;
17 H. Brokering;

18 **RESPONSE TO INTERROGATORY NO. 30:**

19 Prior to approximately 1985 Goulds Pumps sold some centrifugal pumps with
20 asbestos-containing casing gaskets and stuffing box packing. The casing gaskets were
21 manufactured by other corporations and installed during assembly at Goulds Pumps' factory.
22 Stuffing box packing was shipped with the pump, in rings, which were die formed to fit the
23 particular pump dimensions. The rings were inserted at the job site. The customer installing
24 the pump would have made this insertion. Further, the rings were saturated with an
25 oil/graphite substance. Goulds purchased the gaskets and packing materials from various
26 manufacturers, including Garlock, John Crane, Flexitallic, Armstrong and Johns-Manville and
27 may have occasionally supplied such materials as replacement parts. While customers could
28 buy gaskets and packing from Goulds, they generally did not, choosing to buy directly from a

1 vendor or directly from the manufacturer of the part. Goulds did not supply asbestos
2 containing packing or gaskets as part of the pumps or as replacement parts after 1985.

3 **INTERROGATORY NO. 31:**

4 If your answer to any subpart of Interrogatory No. 30 regarding "ASBESTOS-
5 CONTAINING PRODUCTS" is in the affirmative, state:

6 A. The trade, brand name, and/or generic name of each such ASBESTOS-
7 CONTAINING PRODUCT MARKETED in any form or quantity between 1930 and 1985;

8 B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first
9 placed on the market, including the date(s) each such ASBESTOS-CONTAINING
10 PRODUCT was first MARKETED;

11 1. On an experimental basis;

12 2. On a test basis; or

13 3. For sale.

14 C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

15 1. Ceased to be produced; or

16 2. Was recalled from the market, if ever.

17 D. A detailed description of the chemical composition of each such ASBESTOS
18 CONTAINING PRODUCT, including the type and/or grade of asbestos and/or asbestos fiber
19 contained in each such product and the quantitative percentage of asbestos or asbestos fiber in
20 each such product, and all non-asbestos components of the ASBESTOS-CONTAINING
21 PRODUCT, and if the chemical composition changed over time, the inclusive dates of each
22 formulation;

23 E. A description of the physical appearance and nature of each such ASBESTOS-
24 CONTAINING PRODUCT, including any color coding, distinctive marking and/or logo,
25 either on the product or on the packaging;

26 F. A detailed description of the intended use of each such ASBESTOS-
27 CONTAINING PRODUCT, including any temperature limits for each such use;

28 G. Whether any such ASBESTOS-CONTAINING PRODUCT was on the U.S.

1 Governments 'Qualified Products List.' and if so, the inclusive dates it was on such list;

2 H. The name and address of the supplier of the RAW ASBESTOS used in each
3 such product and the time period of such supply;

4 I. Whether any of THIS DEFENDANT's RAW ASBESTOS OR ASBESTOS-
5 CONTAINING PRODUCTS have, at any time, been sold, shipped, or otherwise distributed to
6 any COMPANY (including power company or utility), governmental agency or entity,
7 shipyard, distributor, refinery, contractor, supplier, manufacturer, PREMISE owner or
8 occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA. If so, state:

9 1. The names of each such COMPANY, governmental agency or entity,
10 shipyard, distributor, supplier, manufacturer, refinery, contractor, PREMISE owner or
11 occupant, ship owner, PREMISE or site;

12 2. The inclusive dates of each such sale, shipment, distribution, use or
13 installation and the amount (volume) and the trade or brand name of each such ASBESTOS-
14 CONTAINING PRODUCT sold;

15 3. Whether you have any records indicating any such sale, shipment,
16 distribution, use or installation and, if so, the name, address and job classification of each
17 person who currently has possession of such records.

18 J. Either (1) attach all DOCUMENTS evidencing the information sought in this
19 interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
20 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
21 they may be made the subject of a request for production of documents.

22 **RESPONSE TO INTERROGATORY NO. 31:**

23 A. Goulds Pumps

24 B. Goulds Pumps first marketed and sold pumps that may have used asbestos
25 containing case gaskets beginning on or about 1930.

26 C. Goulds Pumps completely discontinued the use of asbestos containing gaskets
27 in or about 1985.

28 ///

1 D. Goulds Pumps does not have knowledge of the chemical composition, type or
2 grade of asbestos, quantity of asbestos fibers or the non asbestos components of case gaskets
3 it used prior to 1985. Any such asbestos containing components were manufactured by
4 companies other than Goulds Pumps. During the time period prior to August 1, 1975, some
5 packing in some of the models of Goulds Pumps may have contained blue African asbestos
6 and after August 1, 1976, some packing may have contained interlaced braided white
7 asbestos.

8 E. Goulds Pumps does not have knowledge of any specific color coding,
9 distinctive marking and/or logo of any case gasket or packing that may have contained
10 asbestos, except to the extent the various manufacturers of such gaskets identified their own
11 products. At various times, Goulds Pumps may have purchase packing and/or gaskets from
12 Johns-Manville Corporation, John Crane, Seal-All, Sealol, Inc., Flexitalic, Garlock, LeMons
13 Metal Gaskets and others for use in Goulds Pumps. .

14 F. On some pump designs, Goulds Pumps used a gasket to seal the metal halves of
15 the pump casing during assembly. A case gasket, which may or may not have contained
16 asbestos, was used to help establish a leak-proof seal between the metal parts that were joined
17 together. On some industrial pump designs, packing, which may or may not have contained
18 asbestos, was used to control fluid leakage where parts of the pumps that rotated cam in
19 contact with the fluids being pumped.

20 G. Goulds Pumps is not aware if any gaskets or packing material was on the U.S.
21 Government's "Qualified Products List."

22 H. Goulds Pumps is not aware of the supplier of any raw asbestos that might have
23 been used by any of the manufacturers identified in response to subsection E above.

24 I. It would be impossible to specify companies that Goulds Pumps sold pumps to
25 in the GEOGRAPHIC AREA that may have contained either case gaskets or packing material
26 that contained asbestos.

27 **INTERROGATORY NO. 32** (PREMISES DEFENDANTS only)

28 Did YOU install, remove, or handle or contract to have others install, remove, or

1 handle RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any PREMISES in
2 the GEOGRAPHIC AREA which PREMISES is at issue as to YOU in San Francisco
3 Superior Court asbestos litigation as of the date of your answers to these interrogatories? If
4 so:

5 A. IDENTIFY the PREMISES.

6 B. For each of the PREMISES:

- 7 1. State the nature of your ownership or possessory interest;
8 2. State the inclusive date of that interest;
9 3. IDENTIFY the party from whom that interest was acquired;
10 4. IDENTIFY the party, if any, to whom that interest was transferred.

11 C. IDENTIFY every contract to which YOU were a party or of which you have
12 knowledge wherein the performance of such contract involved the installation, removal,
13 disturbing or handling of any RAW ASBESTOS or ASBESTOS-CONTAINING
14 PRODUCTS at YOUR PREMISES. For each such contract:

- 15 1. IDENTIFY the parties to the contract;
16 2. Provide a general description and specific location of the work to be
17 performed by each party to the contract;
18 3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or
19 ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the
20 performance of the contract;

21 4. State the dates of the contract and the dates of performance;

22 D. Except as provided in response to subpart (c), has any work other than routine
23 maintenance been done on or to the PREMISES that involved the installation, removal,
24 disturbing a handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If
25 so, for each such instance:

- 26 1. State the inclusive dates of the work;
27 2. Provide a general description and specific location of the work;
28 3. State whether the work was done by YOU and/or YOUR employees;

1 4. IDENTIFY and describe the NATURE of the RAW ASBESTOS or
2 ASBESTOS-CONTAINING PRODUCTS installed, removed, handled or disturbed;

3 5. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS-
4 CONTAINING PRODUCTS were acquired.

5 E. Has any asbestos abatement effort been made at the PREMISES? If so, for each
6 such effort:

- 7 1. IDENTIFY who did the work;
8 2. State the inclusive dates thereof;
9 3. State whether samples were taken, and, if the samples still exist,
10 IDENTIFY the custodian of the samples;
11 4. State whether any material was tested, and, if so, what were the results
12 of each test;
13 5. IDENTIFY each test result with sufficient particularity for purposes of a
14 request for production of documents, or, in the alternative, attach a copy to YOUR answers to
15 these interrogatories.

16 F. Except for insurance coverage litigation, have you filed suit against, or
17 otherwise sought to recover from, any person or entity for some or all of the cost of asbestos
18 abatement or for the property damage allegedly caused by the presence of RAW ASBESTOS
19 or ASBESTOS-CONTAINING PRODUCTS on the PREMISES identified in response to
20 subpart (A) above? If so:

- 21 1. IDENTIFY the person or entity against whom YOU have filed suit or
22 otherwise sought to recover;
23 2. If YOU have filed suit, state the court in which the action was filed, the
24 date on which it was filed, IDENTIFY all Plaintiffs and Defendants and their counsel of
25 record;
26 3. State whether or not the case has been resolved, and, if so, what was the
27 status or disposition.

28 G. Either (1) attach all DOCUMENTS evidencing the information sought in this

1 interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
2 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
3 they may be made the subject of a request for production of documents.

4 H. IDENTIFY the person(s) presently most knowledgeable about the information
5 ought in this interrogatory or its subparts.

6 **RESPONSE TO INTERROGATORY NO. 32:**

7 Not applicable.

8 **INTERROGATORY NO.33** (CONTRACTOR DEFENDANTS only)

9 At any time between 1930 and 1985, did YOU hold a contractor's license in the State
10 of California? If so:

11 A. IDENTIFY each license by type, date and number.

12 B. If on the date of Your answers YOU are a defendant in four or more asbestos
13 actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU
14 performed (directly or through one or more subcontractors) during this time period for work
15 in any PREMISES which is at issue as to YOU on such date, and in any PREMISES of
16 50,000 square feet or more in the GEOGRAPHIC AREA which job or contract involved
17 installation, removal, disturbing or handling RAW ASBESTOS or ASBESTOS-
18 CONTAINING PRODUCTS. (Alternatively, at your option, you may IDENTIFY each job or
19 contract YOU performed (directly or through one or more subcontractors) during this time
20 frame for all work, or for all work on PREMISES of 50,000 square feet or more, in the
21 GEOGRAPHIC AREA). As to each such job or contract:

22 1. IDENTIFY the location (including name of ship, if applicable) where
23 the job or work was performed;

24 2. State the date of the contract or the inclusive dates of the work;

25 3. IDENTIFY the person or entity with whom you contracted;

26 4. State your job or contract number.

27 C. If on the date of your answers you are not a defendant in four or more asbestos
28 actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU

1 performed (directly or through one or more subcontractors) during this time period for work
2 in any PREMISES which is at issue as to YOU on such date. As to each such job or contract:

- 3 1. IDENTIFY the location (including name of ship, if applicable) where
4 the job or work was performed;
- 5 2. State the date of the contract or the inclusive dates of the work;
- 6 3. IDENTIFY the person or entity with whom you contracted;
- 7 4. State your job or contract number.

8 **RESPONSE TO INTERROGATORY NO. 33:**

9 Not applicable.

10 **INTERROGATORY NO. 34:**

11 Did any of the distributors identified in your Answer to Interrogatory Nos. 29 and 31
12 above have an exclusive distributorship? If so, state the relevant time period.

13 **RESPONSE TO INTERROGATORY NO. 34:**

14 Not applicable.

15 **INTERROGATORY NO. 35:**

16 If THIS DEFENDANT entered into any agreements for the rebranding of any
17 ASBESTOS-CONTAINING PRODUCTS by THIS DEFENDANT for resale or distribution
18 by another person or entity, describe each agreement's terms and the parties to said
19 agreement, the duration of the agreement, and name of each product(s) and/or material(s)
20 covered by each such agreement.

21 **RESPONSE TO INTERROGATORY NO. 35:**

22 Goulds Pumps did not enter into any "rebranding" agreements.

23 **INTERROGATORY NO. 36:**

24 If THIS DEFENDANT entered into any agreements for the rebranding of
25 ASBESTOS-CONTAINING PRODUCTS manufactured, sold, supplied or distributed by
26 another person or entity for resale or distribution by YOU, describe each of the agreements
27 and the parties to said agreement the terms, the duration, and the names of each product(s)
28 and/or material(s) covered by each such agreement.

1 **RESPONSE TO INTERROGATORY NO. 36:**

2 Not applicable.

3 **INTERROGATORY NO. 37:**

4 As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING PRODUCT
5 listed in YOUR responses to Interrogatories No. 29 and 31 did DEFENDANT warn of the
6 health hazards of asbestos? If so, state for each such warning:

7 A. The content, size, color, and location; whether the warning appeared on the
8 material and/or on the container, and/or was placed on a tag; whether the warning was
9 included in contracts; whether the warning was included in advertising or other promotional
10 materials.

11 B. State whether you have any photographs thereof

12 C. The inclusive dates on which you used each such warning;

13 D. State all changes you made in such warnings and the dates of such changes; and

14 E. Identify the person most knowledgeable about your warnings and warning
15 policy.

16 **RESPONSE TO INTERROGATORY NO. 37:**

17 Goulds had nothing to do with RAW ASBESTOS, so this interrogatory is not
18 applicable to Goulds in that regard. Until approximately 1985 some of the pumps Goulds
19 sold may have contained gaskets or case packing containing asbestos. Beginning 1985,
20 Goulds implemented a non-asbestos substitute, and no asbestos containing product has been
21 provided by Goulds since that time.

22 **INTERROGATORY NO. 38:**

23 With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS, state
24 whether THIS DEFENDANT's name, a trademark, logos, color coding, or other identifying
25 markings ever appeared on the actual product itself. If so, IDENTIFY each such product,
26 state when the practice to place such identifying markings upon the product was begun and
27 when it ended, if applicable, and describe in detail the pertinent marking(s) and the purpose, if
28 any, of such markings.

1 **RESPONSE TO INTERROGATORY NO. 38:**

2 Goulds' name, trademark, logo, color coding or other identifying markings did not
3 appear on any asbestos containing gaskets or packing. Goulds' name was typically cast on
4 the pump casing which casings were typically painted by Goulds a distinctive blue color.

5 **INTERROGATORY NO. 39:**

6 Between the years 1930 to 1985, did THIS DEFENDANT purchase or otherwise
7 acquire an ASBESTOS-CONTAINING PRODUCT lines from another person or entity? If
8 so, state for each such purchase:

- 9 A. Date of purchase or acquisition;
10 B. Terms of purchase or acquisition agreement;
11 C. Either (1) attach all DOCUMENTS evidencing said acquisition, or (2) attach
12 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity
13 that they may be made the subject of a request for production of documents.
14 D. Trade, brand, and/or generic name of each such product line so acquired;
15 E. Name of the person or entity from whom YOU purchased or acquired each
16 such ASBESTOS-CONTAINING PRODUCT line; and
17 F. Location of any manufacturing facilities so acquired, and the type of
18 ASBESTOS-CONTAINING PRODUCTS manufactured therein.

19 **RESPONSE TO INTERROGATORY NO. 39**

20 Not applicable.

21 **INTERROGATORY NO. 40:**

22 Between the years 1930 to 1985, did THIS DEFENDANT sell any ASBESTOS-
23 CONTAINING PRODUCT line to another person or entity? If so, state for each such sale:

- 24 A. Date of sale;
25 B. Terms of sales agreement;
26 C. Either (1) attach all DOCUMENTS evidencing said sale, or (2) attach disks
27 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
28 they may be made the subject of a request for production of documents.

1 D. Trade, brand, and/or generic name of each such product line sold;

2 E. Name of person or entity to whom you sold each such ASBESTOS-
3 CONTAINING PRODUCTS line; and

4 F. Location of any manufacturing facilities so sold, and the type of ASBESTOS-
5 CONTAINING PRODUCTS manufactured therein.

6 **RESPONSE TO INTERROGATORY NO. 38:**

7 No. Goulds did not sell off any product line or permit others to brand products.

8 **INTERROGATORY NO. 41:**

9 IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to
10 ASBESTOS-CONTAINING PRODUCTS and/or RAW ASBESTOS which THIS
11 DEFENDANT manufactured, sold, distributed or supplied from the year 1930 to 1985. For
12 each such document, state:

13 A. A description of the document;

14 B. The year it was printed;

15 C. The period of time in which it was used;

16 D. The purpose of such document;

17 E. Whether the documents or copies of said documents presently exist;

18 F. If said documents or copies still exist, where they are located; and

19 G. The IDENTITY of the custodian of such documents.

20 **RESPONSE TO INTERROGATORY NO. 41:**

21 We are attempting to locate responsive documents. Due to the requested time span,
22 and the state of the records, we will be unable to locate or provide the extent of materials as
23 requested and/or they likely no longer exist. An unreasonable burden would be imposed on
24 Goulds Pumps, Inc. to attempt to do so. Subject to agreed conditions, including those
25 pertaining to proprietary, trade secret, medical, confidential, or other limited documents,
26 Goulds is willing to permit a representative of plaintiffs to come to Seneca Falls where
27 microfilm or microfiche records and/or other possibly responsive records are kept as they are
28 and have been maintained in the usual course of business and to inspect and/or copy as may

1 be appropriate.

2 **INTERROGATORY NO. 42:**

3 State if YOU have or had within YOUR corporate or other business structure any
4 CONTRACT UNITS. [A CONTRACT UNIT shall mean a branch, division, subsidiary or
5 other affiliated entity of a DEFENDANT which has been or is now engaged in installation,
6 distributing or handling and/or removal of RAW ASBESTOS and/or ASBESTOS-
7 CONTAINING PRODUCTS.]

8 **RESPONSE TO INTERROGATORY NO. 42:**

9 Goulds Pumps did not have any subsidiary that was or is engaged in the installation,
10 handling and/or removal of RAW ASBESTOS and/or ASBESTOS-CONTAINING
11 PRODUCTS.

12 **INTERROGATORY NO. 43:**

13 State whether or not any of YOUR CONTRACT UNITS installed and/or removed
14 RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in the GEOGRAPHIC
15 AREA at any time between 1930 and 1985. [GEOGRAPHIC AREA means the 46 counties
16 of Northern California and military facilities/installations in the State of California, or the
17 following shipyards: Bethlehem Shipbuilding, San Pedro; California Shipbuilding, Terminal
18 Island; Consolidated Steel Shipyard, Wilmington; Los Angeles Shipbuilding and Dry Dock
19 aka L.A. Ship, San Pedro; National Steel and Shipbuilding Corporation, San Diego; Todd
20 Shipyards Corporation, San Pedro; Tripple "A" Machine, San Diego, Western Pipe and Steel
21 Company, Los Angeles and San Pedro Divisions; Naval Air Station, North Island; Third-
22 second Street Naval Repair Facility, San Diego; Long Beach Naval Shipyard; and San Diego
23 Destroyer Base.] If so:

24 A. State the business addresses and name of the CONTRACT UNIT;

25 B. State the inclusive periods of time the CONTRACT UNITS were working in the
26 GEOGRAPHIC AREA;

27 C. State the name and address of each job site within the GEOGRAPHIC AREA
28 and the dates the CONTRACT UNIT worked at those job sites, and, IDENTIFY the RAW

1 ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS installed or removed on each
2 occasion;

3 D. Either (1) attach all DOCUMENTS evidencing the information sought in this
4 interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
5 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
6 they may be made the subject of a request for production of documents.

7 **RESPONSE TO INTERROGATORY NO. 43:**

8 Not applicable.

9 **INTERROGATORY NO. 44:**

10 When do YOU contend that THIS DEFENDANT first became aware that there is an
11 association between asbestos exposure and disease in human beings?

12 **RESPONSE TO INTERROGATORY NO. 44:**

13 Approximately 1985.

14 **INTERROGATORY NO. 45:**

15 How do YOU contend that THIS DEFENDANT first became aware that there is an
16 association between asbestos exposure and disease in human beings.

17 **RESPONSE TO INTERROGATORY NO. 45:**

18 It is uncertain how Goulds became aware of the connection.

19 **INTERROGATORY NO. 46:**

20 Either (1) attach all DOCUMENTS evidencing the information upon which YOUR
21 contentions in YOUR answers to Interrogatories No. 44 and No. 45 are based, or (2) attach
22 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity
23 that they may be made the subject of a request for production of documents.

24 **RESPONSE TO INTERROGATORY NO. 46:**

25 We are attempting to locate responsive documents. Due to the requested time span,
26 and the state of the records, we will be unable to locate or provide the extent of materials as
27 requested. An unreasonable burden would be imposed on Goulds Pumps, Inc. to attempt to
28 do so. Subject to agreed conditions, per our response to interrogatory 41, Goulds is willing to

1 permit a representative of plaintiff to come to Seneca Falls where microfilm or microfiche
2 records and/or other possibly responsive records are kept as they are or have been maintained
3 in the usual course of business and to inspect and/or copy as may be appropriate.

4 **INTERROGATORY NO. 47:**

5 When did THIS DEFENDANT first warn its employees that exposure to asbestos
6 could be hazardous to human health? State:

- 7 A. Whether the first such warning was written or oral;
8 B. Whether copies of DOCUMENTS containing such warning exist;
9 C. The IDENTITY of the custodian of such DOCUMENTS;
10 D. The content of the warning.

11 **RESPONSE TO INTERROGATORY NO. 47:**

12 We are researching the answer to this interrogatory.

13 **INTERROGATORY NO. 48:**

14 Did THIS DEFENDANT ever issue a written COMPANY policy discontinuing
15 warning its employees that exposure to asbestos could be hazardous to human health? If so,

- 16 A. Provide the date;
17 B. Describe the circumstances; and
18 C. Either (1) attach all DOCUMENTS evidencing the information sought in this
19 Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
20 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
21 they may be made the subject of a request for production of documents.

22 **RESPONSE TO INTERROGATORY NO. 48:**

23 No.

24 **INTERROGATORY NO.49:**

25 Did THIS DEFENDANT provide any Independent Contractor or Subcontractor within
26 the GEOGRAPHIC AREA with a written warning that exposure to asbestos could be
27 hazardous to human health.

28 ///

1 **RESPONSE TO INTERROGATORY NO. 49:**

2 No.

3 **INTERROGATORY NO. 50:**

4 Has THIS DEFENDANT been cited for or otherwise charged by a public agency with
5 a violation in the GEOGRAPHIC AREA of any statute, ordinance, safety order, regulation, or
6 law pertaining to asbestos exposure? For each occasion, IDENTIFY:

7 A. The code section, safety order, statute, or regulation for which THIS
8 DEFENDANT had been cited or otherwise charged;

9 B. The date(s) thereof.

10 C. The agency or other governmental unit which issued the citation or otherwise
11 charged YOU.

12 D. All persons known to YOU with information relevant to the incident.

13 E. What was the ultimate resolution.

14 **RESPONSE TO INTERROGATORY NO. 50:**

15 No.

16 **INTERROGATORY NO. 51:**

17 If THIS DEFENDANT has ever owned or operated a railroad, state:

18 A. The IDENTITY of each such railroad, including the name(s) of such railroad
19 during the time period of YOUR ownership and/or operation, the principal place of business of
20 such railroad and the dates of YOUR ownership and/or operation;

21 B. The geographic area of operation of such railroad;

22 C. The name(s) of such railroad prior to YOUR ownership and/or operation;

23 D. The IDENTITY of the person or entity from whom YOU purchased your
24 ownership or operating interest, and the date of such purchase;

25 E. The IDENTITY of the person or entity to whom YOU sold your ownership or
26 operating interest, and the date of such sale;

27 F. Whether copies of DOCUMENTS evidencing your ownership/operation and/or
28 sale exist;

1 G. The IDENTITY of the Custodian of such DOCUMENTS;

2 H. To the extent that information has not been given in answers to Interrogatory
3 Nos. 32 and 33, the information requested in Interrogatory Nos. 32 and 33, for each railroad
4 owned or operated by YOU.

5 **RESPONSE TO INTERROGATORY NO. 51:**

6 Not applicable.

7 **INTERROGATORY NO. 52:**

8 If THIS DEFENDANT has ever owned or operated a shipyard, state:

9 A. The IDENTITY of each such shipyard, including the name(s) of such shipyard
10 during the time period of YOUR ownership and/or operation, the place of business of such
11 shipyard and the dates of YOUR ownership and/or operation;

12 B. The name(s) of such shipyard prior to YOUR ownership and/or operation;

13 C. The IDENTITY of the person or entity to whom YOU sold your ownership or
14 Operating interest, and the date of such sale;

15 D. Whether copies of DOCUMENTS evidencing your ownership/operation and/or
16 sale exist;

17 E. Whether any representative of THIS DEFENDANT attended the Maritime
18 commission Conference in December 1942 in Chicago, Illinois? If so, IDENTIFY any such
19 representative of THIS DEFENDANT;

20 F. The IDENTITY of the Custodian of such DOCUMENTS;

21 G. To the extent that information has not been given in answers to Interrogatory
22 No. 32, the information requested in Interrogatory No. 32, for each shipyard owned or
23 operated by YOU.

24 **RESPONSE TO INTERROGATORY NO. 52:**

25 Not applicable.

26 **INTERROGATORY NO. 53:**

27 At any time between 1930 and 1985, did you import, export, ship, transship or
28 otherwise transport RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS into, out

1 of or through any port in the GEOGRAPHIC AREA? If so, for each occasion:

2 A. IDENTIFY and describe the NATURE and amount of RAW ASBESTOS
3 and/or ASBESTOS-CONTAINING PRODUCTS;

4 B. IDENTIFY the ship or ships (including the owners and operators thereof) onto
5 or from which the RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS were
6 loaded unloaded or transshipped;

7 C. State the dates, port and pier involved for each occasion;

8 D. Either (1) attach all DOCUMENTS evidencing the information sought in this
9 Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
10 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
11 they may be made the subject of a request for production of documents.

12 **INTERROGATORY NO. 53:**

13 Goulds Pumps is not aware of any import, export or transship of asbestos-containing
14 products through ports in the GEOGRAPHIC AREA. At this date there is no way for Goulds
15 to accurately respond to this interrogatory. Goulds had nothing to do with RAW ASBESTOS.
16 While Goulds likely sold pumps that were or may have been ultimately transshipped or
17 transported to the GEOGRAPHIC AREAS, there is no way to reconstruct detailed
18 information as called for by this interrogatory.

19 DATED: _____

THORNTON, TAYLOR, DOWNS, BECKER
TOLSON & DOHERTY

22 _____
GREG S. TOLSON
ATTORNEY FOR DEFENDANT
GOULDS PUMP, INCORPORATED

1 **PROOF OF SERVICE BY MAIL**

2 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO:**

3 I, the undersigned, declare that I am, and was at the time of service of the papers herein
4 referred to, over the age of eighteen years and not a party to the within action or proceeding. My
5 business address is the law firm of Thornton, Taylor, Downs, Becker, Tolson & Doherty, Suite
6 1600, 505 Sansome Street, San Francisco, California, which is located in the county in which the
7 within-mentioned mailing occurred. I am familiar with the practice at my place of business for
collection and processing of correspondence for mailing with the United States Postal Service.
Such correspondence will be deposited with the United States Postal Service on the same day in
the ordinary course of business.

8 On the date specified below, I served the following document(s):

9 **GOULDS PUMPS, INC. RESPONSES TO PLAINTIFFS' STANDARD
10 INTERROGATORIES TO ALL DEFENDANTS**

11 by placing a true copy/the original in a separate envelope for each addressee named below,
12 with the name and address of the person served shown on the envelope as follows:

13 **Berry & Berry**
14 1300 Clay Street, 9th Floor
Oakland, CA 94612-1425

Francine Curtis
Brayton, Purcell, Curtis, & Geagan
222 Rush Landing Road
P.O. Box 2109
Novato, CA 94948

15 and by sealing the envelope and placing it for collection and mailing with postage fully prepared
16 in accordance with ordinary business practices.

17 I declare under penalty of perjury, under the laws of the State of California and the
United States of America that the foregoing is true and correct.

18 **DATED:** _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 _____
25 _____
26 _____
27 _____
28 _____

Thornton, Taylor, Downs, Becker, Tolson & Doherty
505 Sansome Street, Suite 1600
San Francisco, CA 94111
(415) 421-8890 - Facsimile (415) 421-0688

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