PLAINTIFF'S EXHIBIT

K-1993

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

NANCY KEILHACK, Individually and as Special Administrator of the Estate of Thomas Keilhack, deceased,	)	
Plaintiff,	)	
V.	)	No. 92 L 212
OWENS-CORNING FIBERGLAS CORPORATION, et al.,	)	
Defendants.	)	

DEFENDANT, OWENS-ILLINOIS, INC.'S AMENDED AND SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendant Owens-Illinois, Inc., without waiving any of its objections that were overruled by the Circuit Court on July 2, 1996, hereby provides its Amended and Supplemental Answers to Plaintiff's First Set of Interrogatories.

INTERROGATORIES

Q. 1. Have these interrogatories been answered fully and in good faith to the extent of the actual knowledge and information available to Defendant, OWENS-ILLINOIS, INC., its insurance carrier(s) and attorneys?

A. 1. These interrogatories request information about matters some of which occurred between forty and fifty

(d) Owens-Illinois believes that its commercially produced asbestos-containing products were hydrous calcium silicates containing between 13% and approximately 20% asbestos. Chrysotile asbestos was the primary type apparently used. Amosite was incorporated to a lesser extent.

(e) Owens-Illinois Glass Company began limited pilot plant operations involving the production of Kaylo asbestos-containing products in 1943. It began the manufacture of commercial quantities of Kaylo asbestos-containing products in about 1948, and began the manufacture of commercial quantities of Kaylo-20 in or after mid-1955, and continued such manufacture until April 30, 1958.

Q. 39. Has Defendant, at any time since it began selling asbestos or asbestos containing products, issued a warning concerning the consequences of exposure to asbestos, which warning was intended by Defendant to reach those persons who would breath or ingest asbestos or asbestos containing products during their distribution and/or use? If so, state as to each such warning:

(a) the language of the warning;

(b) date first issued or distributed;

AFFIDAVIT

STATE OF OHIO)

) SS:

COUNTY OF WOOD)

H.G. BRUSS, being duly sworn according to law, deposes and says that he is an Assistant Secretary of Owens-Illinois, Inc., a Defendant herein; that as such he is authorized to make an Affidavit on its behalf; and that the facts set forth in the foregoing DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO INTERROGATORIES are true and correct to the best of his knowledge, information and belief.

H.G. BRUSS

SWORN TO and subscribed before me this ~~12~~ 15 day of ~~January~~ August, 1996

My Commission Expires: September, 22 1997

SEAL

Notary Public

VICTORIA A. GALLAGHER
Notary Public, State of Ohio
My Commission Expires Sept. 22, 1997

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