PLAINTIFF'S EXHIBIT

BOND-522

IN RE: ALL ASBESTOS-RELATED PERSONAL INJURY OR DEATH CASES FILED BY BARON & BUDD, P.C. OR TO BE FILED BY BARON AND BUDD, P.C. IN DALLAS COUNTY, TEXAS	§ § § § § § §	IN THE DISTRICT COURTS DALLAS COUNTY, TEXAS 68TH JUDICIAL DISTRICT

RESPONSES OF BONDEX INTERNATIONAL, INC. TO
PLAINTIFFS' MASTER INTERROGATORIES AND REQUESTS FOR PRODUCTION

Bondex International, Inc. ("Bondex") hereby responds to Plaintiffs' Master Interrogatories and Requests for Production.

Bondex reserves the right to amend or supplement its Responses if it finds that inadvertent omissions or errors have been made or if additional or more accurate information becomes available that is required to be provided.

GENERAL OBJECTIONS

Bondex objects to these Interrogatories and Requests to the extent they seek it to respond on behalf of any other entity. Bondex was incorporated in the state of Ohio on May 22, 1972 as an independently operated wholly owned subsidiary of RPM, Inc. On May 31, 1972, Bondex acquired the assets of and assumed the liabilities of The Reardon Company Division of RPM, Inc. ("Reardon"), which manufactured and sold, among other things, certain asbestos-containing products. Bondex continued the manufacture and sale of such products until the cessation of same at various times thereafter. Accordingly, Bondex' Responses to these Interrogatories and Requests are limited (1) to such information as Bondex possesses relating to the activities of Reardon prior to May 31, 1972 and (2) to information relating to its own activities subsequent to May 31, 1972.

Bondex objects to these Interrogatories and Requests to the extent they are not

limited by time. Bondex ceased the manufacture of all asbestos-containing products in 1981.

Bondex objects to these Interrogatories and Requests on the grounds that they are overly broad, unduly burdensome, and seek information which is irrelevant and immaterial and which is not reasonably calculated to lead to the discovery of admissible evidence.

Bondex objects to these Interrogatories and Requests to the extent they are not limited by time to a period prior to or contemporaneous with the events underlying each plaintiff's lawsuit.

Bondex objects to these Interrogatories and Requests to the extent they are not limited by scope to the specific product or products to which each plaintiff claims exposure.

Bondex objects to these Interrogatories and Requests to the extent they seek it to provide information protected by the attorney/client privilege or information otherwise protected from discovery on the grounds of privilege.

Bondex objects to these Interrogatories and Requests to the extent they seek it to provide information prepared or obtained in anticipation of litigation or for trial.

These general objections are applicable to Bondex' Response to each and every Interrogatory and Request herein, whether or not specifically stated in such Response.

RESPONSES

1. State the name, address, 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 of each person who has supplied any information used in answering these interrogatories.

RESPONSE: **Bondex has, over a period of many years and with the advice and assistance of Bondex' General Counsel and retained counsel, met with former and current employees and reviewed numerous documents in developing the information relied upon in responding to these Interrogatories. As the information was developed in cumulative fashion, over time, it is not possible to identify by name each person who could be said to have supplied information relied upon in responding to these Interrogatories.**

2. State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

RESPONSE: **Bondex International, Inc., 707 Spirit 40 Park Drive, Suite 130, Chesterfield, Missouri 63005. Bondex was incorporated in the State of Ohio on May 22, 1972. To the best of its knowledge, Bondex has never held a certificate of authority to do business in the State of Texas.**

3. Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

4. Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Attachment A. Additionally, all documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

5. Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Attachment A. Additionally, all documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

6. If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product in the following:

(A) As to each product, state whether such product was mined, manufactured, marketed, and/or sold.

(B) The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed and/or sold.

(C) The trade or brand name of each of those products mined, manufactured, marketed and/or sold.

(D) The date each of the named products was placed on the market.

(E) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.

(F) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

(G) The date asbestos was removed from such products, if ever, and the reasons therefor.

(H) A description of the physical appearance of each of the named products.

(I) A detailed description of the intended uses of the named products.

(J) Identify the last year that you sold each asbestos-containing product.

RESPONSE: **(A-J) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Attachment A. Additionally, all documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

7. Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

(A) A description of each such document.

(B) The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

RESPONSE: **(A-B) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All such documents as Bondex has located, after a diligent search, will be produced to plaintiffs' counsel.**

8. Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

(A) The names of the products tested and the date of each test.

(B) The name, address, and job title of each person conducting the rests or involved with conducting the tests.

(C) The results of the tests.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

9. Do 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 referred to in Interrogatory No. 6 now exist? If so, state:

(A) A description of each such document.

(B) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

RESPONSE: **(A-B) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Not applicable. See Response to Interrogatory No. 8 above.**

10. Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

(A) The trade names of the products changed.

(B) The nature of the changes made and the date of such changes or modifications.

(C) The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Not applicable. See Response to Interrogatory No. 8 above.**

11. After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

(A) The names of the products tested and the dates of such tests.

(B) The name, address and job title of each person who conducted those tests.

(C) The results of those tests.

(D) Whether, as a result of the tests, any products were removed from the market.

(E) The names of all products removed from the market as a result of these tests.

RESPONSE: **(A-E) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

12. Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

(A) The names of each product.

(B) A description of each document and how it relates to each product.

(C) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, relating, in any way, to the products described in Attachment A will be produced to plaintiffs' counsel.**

13. Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 8 or 11? If the answer is affirmative, state:

(A) Then names of the products changed or modified.

(B) The name, address, and job title of each person responsible for having made a change or modification.

(C) The nature of the hazard or defect which resulted in such change or modification.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Not applicable. See Responses to Interrogatory Nos. 8 & 11 above.**

14. Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

(A) The names of each relevant product.

(B) The exact wording of each warning statement on each printed material.

(C) A description of the printed material other than the warning statement.

(D) The method used to distribute the warning to persons likely to use the product.

(E) The date each warning was first issued, distributed, or placed on packaging.

(F) The name, address, and job title of each person responsible for having drafted or issued the warning.

(G) The current location of any such printed material and the custodian thereof.

(H) The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

RESPONSE: **(A-H) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Yes.**

As required by the State of New York in approximately 1972, the following warning label was printed conspicuously on Bondex' packaging for those asbestos-containing products which were placed for sale in the New York area and which could conceivably be sprayed by an applicator.

CONTAINS ASBESTOS ----- SPRAY APPLICATION PROHIBITED

IN THE STATE OF NEW YORK

As required by OSHA, the following asbestos warning label was printed conspicuously on packaging for Bondex' paint, patch and repair asbestos-containing products. Bondex is unable to determine the specific date on which this asbestos warning label was first placed on its packaging. However, Bondex believes this occurred during the 1972 to 1974 time frame.

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE

SERIOUS BODILY HARM.

Additionally, the following general warning label was printed conspicuously on Bondex' packaging for those asbestos-containing products which could conceivably be sprayed by an applicator. Bondex is unable to determine the date on which this general warning label was first placed on its packaging.

DO NOT SPRAY WHERE PROHIBITED BY LAW.

All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.

15. Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Dallas County, Texas, is or are claiming or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, 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 who represents each individual making a claim.

(F) The style and court number of each claim.

(G) The disposition of each claim that has been settled or taken to judgement.

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

16. Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Attachment A for the names of those entities with whom Bondex had private labeling agreements and the products sold under such agreements. Additionally, all documents which Bondex has located, after a diligent search, which contain information about those private labeling agreements will be produced to plaintiffs' counsel.**

17. Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon Washington, Georgia, Tennessee, Texas, and Virginia? If so, state:

(A) The name and address of each such distributor or sales representatives.

(B) The years in which such company or person distributed, marketed, or sold your products.

(C) What products were distributed, marketed, or sold and in what years.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

18. List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current

address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, None.**

19. Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

(A) The name of each such publication.

(B) The date of publication and the names of the author and publisher (if any).

(C) The date received by Defendant, if known.

(D) The name, job title, and address or each person who currently has possession of each publication and its present location.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

20. Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

(A) The name and address of each such association or organization.

(B) The dates during which Defendant or any of its subsidiaries or predecessors were members.

(C) The names and dates or any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.

(D) Whether any of those publications are still in your possession, and if so:

1. A description of the publications, including the date.

2. The current location of such publications.

3. The custodian of such publications.

4. The method or manner in which such publications are maintained.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

21. Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states:**

7501 Page Avenue
St. Louis, Missouri
Unkown - 1967

3616 Scarlet Oak Blvd.
St. Louis, Missouri
1967 - 1981

1731 W. Olympic
Los Angeles, California
1927 – 1966 or 1967

1444 W. 37th
Chicago, Illinois
1928 – Early 1960's

145 E. 5th
Bayonne, New Jersey
1946 - 1962

Germania Station Road
Toms River, New Jersey
1962 - 1981

Bondex believes that all products described in Attachment A, except the Waterproofing Products, were manufactured at all facilities. The Waterproofing Products were manufactured at 3616 Scarlet Oak Blvd., St. Louis, Missouri.

All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.

22 Have printed sales materials been prepared by Defendant or any of its subsidiary companies or their agents for purposes or marketing or advertising products containing asbestos? If so, state:

(A) The name, address, and job title of each person or entity who prepared such materials.

(B) The name, address, and job title of each person who currently has possession of such materials and their present location.

(C) The date the materials were prepared.

(D) The media used to disseminate the sales materials.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

23. Have any written or printed materials or instructions of any kind or character been prepared by defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

(A) The name, address, and job title of each person or entity who prepared such materials or instructions or assisted in their preparation.

(B) The name, address, and job title of each person who currently has possession of such materials or instructions and their present location.

(C) The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.

(D) The year each such written material or instruction was prepared and disclosed to potential customers.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

24. Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

25. As to the disease asbestosis, state:

(A) The date on which each Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

(B) How Defendant became aware of the existence of the disease.

(C) Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.

(D) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(E) Whether any such information is still maintained by Defendant or its subsidiary or predecessor on any written form.

(F) Who is the custodian of such information.

(G) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations**

contained therein, Bondex states: Bondex has been unable to determine the specific date or dates when any of its employees or officers may have first learned of asbestosis. However, to the best of its knowledge, none of its employees or officers were aware of the allegations that exposure to asbestos fiber, at certain levels, might be harmful until approximately 1972 when OSHA issued certain rules and regulations relating to asbestos and certain states began placing restrictions on the application by spray equipment of certain asbestos-containing products. Accordingly, it was not until 1972 or later that Bondex first learned of asbestosis.

26. As to the disease lung cancer, state:

(A) The date on which each Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

(B) How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.

(C) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(D) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(E) Whether any such information is still maintained by Defendant or its subsidiaries or predecessors in a written form.

(F) Who is the custodian of such information.

(G) The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations**

contained therein, Bondex states: Bondex has been unable to determine the specific date or dates when any of its employees or officers may have first learned of the alleged association between exposure to asbestos and lung cancer. However, to the best of its knowledge, none of its employees or officers were aware of the allegations that exposure to asbestos fiber, at certain levels, might be harmful until approximately 1972 when OSHA issued certain rules and regulations relating to asbestos and certain states began placing restrictions on the application by spray equipment of certain asbestos-containing products. Accordingly, it was not until 1972 or later that Bondex first learned of such alleged association.

27. As to pleural disease, pleural thickening or pleural plaques, state:

(A) The date on which each Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.

(B) How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

(C) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(D) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(E) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(F) Who is the custodian of such information.

RESPONSE: **(A-F) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Bondex has been unable to determine the**

specific date or dates when any of its employees or officers may have first learned of the association between exposure to asbestos and pleural disease, pleural thickening or pleural plaques. However, to the best of its knowledge, none of its employees or officers were aware of the allegations that exposure to asbestos fiber, at certain levels, might be harmful until approximately 1972 when OSHA issued certain rules and regulations relating to asbestos and certain states began placing restrictions on the application by spray equipment of certain asbestos-containing products. Accordingly, it was not until 1972 or later that Bondex first learned of such association.

28. As to the disease mesothelioma, state:

(A) The date on which each Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.

(B) The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.

(C) How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

(D) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(E) What information was disseminated within the Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(F) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(G) Who is the custodian of such information.

(H) Whether Defendant agrees that there is no known medical cure for mesothelioma.

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Bondex has been unable to determine the specific date or dates when any of its employees or officers may have first learned of the association between exposure to asbestos and mesothelioma. However, to the best of its knowledge, none of its employees or officers were aware of the allegations that exposure to asbestos fiber, at certain levels, might be harmful until approximately 1972 when OSHA issued certain rules and regulations relating to asbestos and certain states began placing restrictions on the application by spray equipment of certain asbestos-containing products. Accordingly, it was not until 1972 or later that Bondex first learned of such association.**

(H) Bondex objects specifically to this subparagraph of this Interrogatory on the grounds that it requires an expert medical opinion which Bondex is not qualified to render.

29. As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

(A) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

(B) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

(C) The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

(D) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

(E) What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(F) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(G) Who is the custodian of such information.

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Bondex objects specifically to this Interrogatory on the grounds that it requires Bondex to comment on the alleged association between exposure to asbestos and various cancers which requires expert medical knowledge which Bondex does not have. The Interrogatory requires an expert medical opinion which Bondex is not qualified to render.**

30. Does Defendant contend that asbestos products can be manufactured or designed as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

RESPONSE: **Bondex incorporates by reference its General Objections. Bondex objects specifically to this Interrogatory on the grounds that it requires an expert medical or industrial hygiene opinion which Bondex is not qualified to render.**

31. Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates of each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

32. Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

(A) The name of the company manufacturing the asbestos products.

(B) The trade name affixed to those products.

(C) The periods of time covered by each such agreement.

(D) The volume, in dollar amount, of each transaction.

(E) The initial purchaser of the products.

RESPONSE: **(A-E) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states:**

See Attachment A for the names of entities with whom Bondex had private labeling agreements and the products sold under such agreements. All documents which Bondex has located, after a diligent search, relating to said private labeling agreements will be produced to plaintiffs' counsel.

Additionally, certain of the Waterproofing Products described in Attachment A, specifically Bondex Heavy Duty Liquid Aluminum Roof Coating,

Bondex Black Plastic Roof Cement and Bondex Black Mastic Roof Coating, were, for a period of time, manufactured for Bondex by Republic Powdered Metals, Inc.

33. List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Bondex believes that the following were among its suppliers of chrysotile asbestos fiber: Carey Canadian Mines, Ltd., Thompson-Hayward Chemical, Co., Canadian Johns-Manville Co., Ltd., Carey Canada, Inc., Jensen & Soudais Associates, Inc., Lake Asbestos, Pacific Asbestos Corp. and International Fibers, Inc. Additionally, all documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

34. Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

(A) The name, address, and job title of each person having custody of each of those documents and their current location.

(B) A brief description of each such document, including the dates and the parties signatory.

RESPONSE: **(A-B) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after**

a diligent search, which contain information relating to the private labeling agreements referred to in the Response to Interrogatory No. 32 above will be produced to plaintiffs' counsel.

35. Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

(A) A list of the claims, including each claimant's name, address, and the date each claim was filed, and including the caption and jurisdiction of the claim.

(B) The disease alleged in each such claim.

(C) A brief summary of the disposition of each such claim.

(D) The name, address and title of the person having custody of the records pertaining to each such claim.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

36. Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards, or asbestos products? If so, for each such set of minutes, state:

(A) The dates of each such meeting.

(B) The general subject matter discussed at each meeting.

(C) Who was in attendance at each meeting.

(D) Where and by whom the written minutes are presently maintained.

(E) By whom the minutes were taken and put into final format.

(F) Whether the minutes were abstracted and the reports disseminated to other individuals, and if so, the names and job titles or those individuals.

RESPONSE: **(A-F) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

37. Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

(A) As to each product, whether such product is mined, manufactured, and/or marketed or sold.

(B) The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.

(C) The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

(D) The date each of the named products was place on the market.

(E) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.

(F) A description of the physical appearance of each product and its packaging.

(G) A detailed description of the intended uses of each of the named products.

(H) Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

RESPONSE: **(A-H) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: No.**

38. State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

(A) The location of such documents.

(B) The name and address of the custodian of the documents.

(C) The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.

(D) In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.**

39. May you call company representatives as witnesses at the trial of any of these cases? If so, list:

(A) The name, address, and job title of each company representative who may be called,

(B) A summary of the testimony expected to be given by each such witness.

(C) List any and all previous times that the named witnessed have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

RESPONSE: **(A-C) Bondex has not yet determined the identity of any person whom it may call as a witness at the trial of this case. Bondex reserves its right to supplement this Response as necessary.**

40. Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

(A) Full and correct name;

(B) Principal place of business;

(C) State of incorporation;

(D) Date of acquisition by Defendant;

(E) Whether or not the business entity was ever authorized to transact business in the State of Texas;

RESPONSE: **(A-E) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Yes.**

1. A. Assets of the Reardon Company Division of RPM, Inc.

B. Missouri.

C. Ohio.

D. May 31, 1972.

E. To the best of its knowledge, No.

2. A. Assets of the Tropical Paint Company Division of Grow Chemical Coatings Corp.

B. Delaware.

C. Ohio.

D. December 29, 1976.

E. To the best of its knowledge, No.

41. Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after the sale or distribution and before reaching the user.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Yes.**

42. For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states:**

As to the Interior Paints and Finishes, Patching Materials, Drywall Materials and Primers described in Attachment A, do-it-yourself home remodelers, drywallers and painters.

As to the Waterproofing Products described in Attachment A, building and roof maintenance workers.

43. Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of the application, can such products be generally applied without liberating asbestos fibers into the air?

(A) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.

(B) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

RESPONSE: **(A-B) Bondex incorporates by reference its General Objections. Bondex objects specifically to this Interrogatory on the grounds that it requires an expert industrial hygiene opinion which Bondex is not qualified to render.**

44. Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced sometime after installation?

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: No.**

45. Before 1970, did you or you subsidiaries or predecessor (s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust

level counts? If so, state when this procedure stated, the purpose of such procedures, and all results of such procedures.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

46. If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Response to Interrogatory No. 45 above.**

47. Has your company or its subsidiaries or predecessor (s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

(A) Name of the person or firm conducting such studies;

(B) The date the studies began and the date they were completed;

(C) Any publication or other written dissemination of the results of the studies;

(D) The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

48. Does your company have, has it ever had, or have your predecessor (s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

(A) The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?

(B) What percentage of gross sales did your company or its predecessor (s) spend on research concerning the health effects of asbestos?

(C) State on detail the purposes, duties, and responsibilities or such Research Department.

RESPONSE: (A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.

49. Does your company have, or has it ever had, or have your predecessor (s) or subsidiaries ever had, a Medical Department? If so, state:

(A) The year such Medical Department was established;

(B) Whether or not such Medical Department has operated continuously since being established;

(C) The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;

(D) State the duties and responsibilities of such Medical Department.

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

50. Did your company or its predecessor (s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product (s) and year said warning was first applied.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: See Response to Interrogatory No. 14 above.**

51. Did your company or its predecessor (s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: No, only on the packaging for the products.**

52. Has your company, or your predecessor (s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein,**

Bondex states: All documents which Bondex has located, after a diligent search, which contain information responsive to this Interrogatory will be produced to plaintiffs' counsel.

53. Did your company or its predecessor (s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

(A) All details of such recall;

(B) The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;

(C) The dates of recall;

(D) The purpose for the recall;

RESPONSE: **(A-D) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: No.**

54. Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

55. Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

56. Did your company or its predecessor (s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, No.**

57. As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

(A) The year in which Defendant or any predecessor (s) or subsidiaries were first advised of such limits or concentrations;

(B) The name of the employee or official of the company receiving such advice;

(C) How Defendant received the notice of such limits or concentrations.

RESPONSE: **(A-C) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: It has been unable to determine the specific date or dates when any of its employees or officers may have first learned of either threshold limit values or maximum allowable concentrations relating to asbestos. However, Bondex did not become aware of the allegations that exposure to asbestos fiber, at certain levels, might be harmful until approximately**

1972 when OSHA issued certain rules and regulations relating to asbestos and certain states began placing restrictions on the application by spray equipment of certain asbestos-containing products. Accordingly, it was not until 1972 or later that Bondex first learned of threshold limit values or maximum allowable concentrations relating to asbestos.

58. Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 57 for total dust, and not asbestos dust alone?

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, when it first learned of threshold limit values or maximum allowable concentrations relating to asbestos, Bondex believed such values referred to asbestos dust alone.

59. State in detail what tests, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, None.

60. Please state the following with respect to each expert witness that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

(a) The name, address, and job classification of each such expert witness;

(b) The subject matter on which the expert is expected to testify;

(c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;

(d) Whether any person identified on subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;

(e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;

(f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

RESPONSE: **(a-f) Bondex has not yet determined the identity of any expert which it may call as an expert witness at the trial of any individual plaintiff's case. Bondex will supplement this Response as necessary.**

61. Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

(a) Identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.

(b) Each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;

(c) The negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;

(d) Each of the Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

RESPONSE: **(a-d) Bondex has not yet determined the identity of any person it may call as a fact witness at the trial of any individual plaintiff's case. Bondex will supplement this Response as necessary.**

62. Please identify documents which will be used at time of trial, (Exhibit List, deposition List), which are relevant to each of Defendant's enumerated defenses in defendant's last filed Answer.

RESPONSE: **Bondex has not yet determined documents or exhibits it will use at the trial of any individual plaintiff's case. Bondex will supplement this Response as necessary.**

63. When, if ever, did Defendant or any of its predecessor-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al. ("the Fleischer-Drinker Report")?

(A) Identify the name and position of the employee or officer who received the same;

(B) Please produce all documents generated by defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;

(C) Please produce all documents upon which your responses above are based;

(D) Please identify the name (s) and address (es) of any person (s) who can verify your above response;

(E) Did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be

used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;

(F) If so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;

(G) If your answer to 63 (e) is yes, when was the first date Defendant relied on the Fleischer-Drinker report in whole or in part for the proposition stated in 63 (e) above?

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, Never.**

64. When, if ever, did defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U.S. Public Health Service and authored by W.C. Dreessen ("the Dreessen report")?

(A) Identify the name and position of the employee or officer who received the same;

(B) Please produce all documents generated by defendant which discuss or in any way reference the "Dreessen" study prior to 1968;

(C) Please produce all documents upon which your responses above are based;

(D) Please identify the name (s) and address (es) of any person (s) who can verify your above response;

(E) Did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;

(F) If so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;

(G) If your answer to 63 (e) is yes, when was the first date Defendant relied on the Dreessen report in whole or in part for the proposition stated in 63 (e) above?

RESPONSE: **(A-G) Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: To the best of its knowledge, Never.**

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: Such documents as Bondex has been able to locate, after a diligent search, are included in the accompanying box or boxes of documents numbered BON 00001 through BON 03578.**

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections and subject to the limitations contained therein, Bondex states: It has no such documents.**

BOWERS ORR, L.L.P.

By: Ellin W. Grant/CRW
Ellin W. Grant, Esquire, No. 21139575
8910 Two Notch Rd., Suite 400
P.O. Box 25389
Columbia, SC 29224
(803) 788-5220
(803) 788-6767 (FAX)

May 15, 2002

PRODUCTS

Bondex International, Inc. ("Bondex") was incorporated in the state of Ohio on May 22, 1972 as an independently operated wholly owned subsidiary of RPM, Inc. On May 31, 1972, Bondex acquired the assets of and assumed the liabilities of The Reardon Company Division of RPM, Inc. ("Reardon"), which manufactured and sold, among other things, certain asbestos-containing products. Bondex continued the manufacture and sale of such products until the cessation of same at various times thereafter.

The following list includes, to the extent that Bondex has been able to determine, information about those products manufactured and sold by Reardon prior to May 31, 1972 which contained chrysotile asbestos fiber as a deliberately added ingredient and information about those products manufactured and sold by Bondex after May 31, 1972 which contained chrysotile asbestos fiber as a deliberately added ingredient.

The list is based upon a diligent and protracted investigation and is believed to be accurate as of the date made. However, Bondex' investigation is a continuing process and Bondex cannot exclude the possibility that it may obtain more complete information. Bondex reserves the right to amend or supplement the list if additional or more accurate information becomes available.

I. Interior Paints and Finishes

A. Dramex Interior Finish

(1) Type of Product

A heavy-bodied durable interior texture finish.

(2) Date First Manufactured

1948.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

1.2 percent to 7.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

5, 15 and 25-pound containers.

(7) Method of Application

Applied with wide wall brush.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Dramex Texture Paint; Trax Texture Paint; Wards Texture (Under a private labeling agreement with Montgomery Ward & Co., Inc.); Dramex Spanish Texturing Paint; Metro Texturing (Marketed in New York City only).

B. Dramex Ready Mixed Interior Finish

(1) Type of Product

A heavy-bodied durable interior texture finish.

(2) Date First Manufactured

1957.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

5.9 percent to 7.2 percent by weight.

(5) Color and Physical Characteristics

White. A paste. Available in smooth, medium, and rough finishes.

(6) Packaging

1-gallon containers.

(7) Method of Application

Applied with wide wall brush or roller.

(8) At Various Times, Also May Have Been Sold Under The Following Names Dramex Ready Mixed Texture Paint; F.O. Pierce Dramex (Under an agreement with F.O. Pierce); Metro Interior Finish (Marketed in New York City only); Metro Texturing (Marketed in New York City only); Metro Spanish Texture Paint (Marketed in New York City only).

II. Patching Materials

A. **Water Putty**

(1) Type of Product

An all-purpose interior patching and resurfacing compound.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.4 percent to 6.5 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water to a paste consistency.

(6) Packaging

1, 4, 5, 15 and 25-pound containers.

(7) Method of Application

Applied by putty knife, broadknife, or trowel.

(8) At Various Times, Also May Have Been Sold Under The Following Names Reardon's Water Putty; Reardon's Wood Putty; Penncraft Water Putty (Under a private labeling agreement with J.C. Penney Company, Inc.); Wards Wood Putty (Under a private labeling agreement with Montgomery Ward & Co., Inc.).

B. **Multi-Patch**

(1) Type of Product

A quick setting interior patching and resurfacing compound.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.5 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

1, 5, 15 and 25-pound containers.

(7) Method of Application

Applied by trowel or knife.

(8) At Various Times, Also May Have Been Sold Under The Following Names

None.

C. **Handy Patch All Purpose Patcher**

(1) Type of Product

An encapsultated ready-to-use all-purpose interior and exterior patching compound.

(2) Date First Manufactured

1967.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

7.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A paste.

(6) Packaging

Pint, quart and 1 gallon containers.

(7) Method of Application

Applied with knife, trowel, or brush.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Reardon's Handy Patch All Purpose Patcher, Formula 1031.

III. Drywall Materials

A. SX Joint Cement

(1) Type of Product

A joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1976.

(4) Percentage of Chrysotile Asbestos Fiber

4.8 percent to 13.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

5, 15, and 25-pound containers. Also packaged with joint tape in 4 and 18-pound containers.

(7) Method of Application

Applied by trowel or broadknife.

(8) At Various Times, Also May Have Been Sold Under The Following Names Reardon's SX Joint Cement; Trax Joint Cement; Penncraft Joint Cement (Under a private labeling agreement with J. C. Penney Company, Inc.); NPD SX Joint Cement (Under a private labeling agreement with National Paint Distributors. Also sold as NPD SX Joint Cement Combination which included joint tape); Hi & Dri Joint Cement.

B. SX Topping Cement

(1) Type of Product

A joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.9 percent to 14.8 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by trowel or broadknife.

(8) At Various Times, Also May Have Been Sold Under The Following Names Reardon's SX Topping Cement; Trax Topping Cement; Hi & Dri Topping Cement.

C. Joint Compound - All Purpose

(1) Type of Product

A joint compound for use in taping drywall. Also suitable for texturing.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.8 percent to 5.0 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by broadknife.

(8) At Various Times, Also May Have Been Sold Under The Following Names Reardon's All Purpose Joint, Topping and Texture Paint; Reardon's 500-C All Purpose Joint Cement; NPD All Purpose Joint Cement (Under a private labeling agreement with National Paint Distributors); Cook's Lifeline All Purpose Texture Joint and Topping Cement (Under a private labeling agreement with Cook Paint & Varnish Company); "Our Best Grade" Joint Cement (Marketed in the St. Louis, Missouri area only under a private labeling agreement with Hill Behan Stores); GSA Joint Compound (Sold pursuant to contracts with the General Services Administration and manufactured in accordance with federal specification SS-J-570a); Reardon's All Purpose Joint Cement; Bondex "Premium" Joint Compound; Bondex Joint Compound; Bondex 100-A All Purpose Joint Cement; Bondex 200-B All Purpose Joint Cement; Bondex 500-C All Purpose Joint Cement.

D. Pre-Mixed Joint Cement

(1) Type of Product

A ready-to-use joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

3.4 percent to 3.8 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A paste.

(6) Packaging

12, 24, 50 and 62-pound containers.

(7) Method of Application

Applied by broadknife.

(8) At Various Times, Also May Have Been Sold Under The Following Names Reardon's Ready-Mixed Joint Cement; Reardon's Pre-Mixed Joint Cement; Wards All Purpose Joint Cement (Ready-Mixed) (Under a private labeling agreement with Montgomery Ward & Co., Inc.); Penncraft Pre-Mixed Joint Cement (Under a private labeling agreement with J.C. Penney Company, Inc.); Brod Dugan Red-I-Mix Joint Cement (Marketed in the St. Louis, Missouri area only under a private labeling agreement with Brod Dugan Paint Company).

IV. Primers

A. Block Filler and Primer

(1) Type of Product

A surface primer for porous concrete and masonry.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.3 percent to 9.1 percent by dry weight.

(5) Color and Physical Characteristics

White. A powder which required mixing with water to a thick liquid consistency.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by brush.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Reardon's Block Filler and Primer; Penncraft Block Filler (Under a private labeling agreement with J.C. Penney, Inc.).

V. Waterproofing Products

A. Bontone Acrylic Fibred Coating

(1) Type of Product

An encapsulated ready-to-use heavy-bodied acrylic-based paint designed as an exterior waterproof masonry coating.

(2) Date First Manufactured

1968.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1974.

(4) Percentage of Chrysotile Asbestos Fiber

Bondex has been unable to locate a formula for Bontone Acrylic Fibred Coating.

(5) Color and Physical Characteristics

White and some factory mixed colors. A liquid.

(6) Packaging

1, 5 and 55-gallon containers.

(7) Method of Application

Applied by brush, roller, or spray.

(8) At Various Times, Also May Have Been Sold Under The Following Names

None.

B. **Bondex Heavy Duty Liquid Aluminum Roof Coating**

(1) Type of Product

An encapsulated ready-to-use asphalt based flexible heavy-bodied coating for previously installed roofing, metal and masonry surfaces.

(2) Date First Manufactured

1967.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

9.4 percent to 11.8 percent by weight.

(5) Color and Physical Characteristics

Silver-gray. A heavy-bodied liquid.

(6) Packaging

Quart,1, 2 ½, 5 and 55-gallon containers.

(7) Method of Application

Applied by brush, broom or spray.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Alumanation 301; Alumination 350; (Under an agreement with Republic Powdered Metals, Inc.); Mobile Home Aluminum Roof Coating.

C. **Bondex (Bondek) Black Plastic Roof Cement**

(1) Type of Product

An encapsulated ready-mixed asphalt based trowel grade roofing cement.

(2) Date First Manufactured

1968.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

10 percent to 16.5 percent by weight.

(5) Color and Physical Characteristics

Black. A thick non-pourable paste.

(6) Packaging

Quart, 1, 2 ½, 5, 30 and 55 gallon containers.

(7) Method of Application

Applied by trowel.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Perma-Plastic (Under an agreement with Republic Powdered Metals, Inc.).

D. **Bondex (Bondek) Black Mastic Roof Coating**

(1) Type of Product.

An encapsulated ready-to-use asphalt based flexible heavy-bodied coating for previously installed roofing, metal and masonry surfaces.

(2) Date First Manufactured

1969.

(3) Date Last Manufactured By Bondex Containing Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

2.1 percent to 8.9 percent by weight.

(5) Color and Physical Characteristics

Black. A gooey semi-liquid.

(6) Packaging

1, 5 and 55-gallon containers.

(7) Method of Application

Applied by brush or heavy-duty spray equipment.

(8) At Various Times, Also May Have Been Sold Under The Following Names

Permaroof (Under an agreement with Republic Powdered Metals, Inc.).

E. **"Stays White" Mobile Home Roof Coating**

(1) Type of Product

An encapsulated heavy-bodied vinyl latex coating formulated exclusively for use on mobile homes, recreational vehicles, and travel trailers.

(2) Date First Manufactured

1972.

(3) Date Last Manufactured By Bondex Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

Bondex has been unable to locate a formula for "Stays White" Mobile Home Roof Coating.

(5) Color and Physical Characteristics

White. A heavy-bodied liquid.

(6) Packaging

1, 2-1/2, and 5-gallon containers.

(7) Method of Application

Applied by brush or roller.

(8) At Various Times, Also May Have Been Sold Under The Following Names

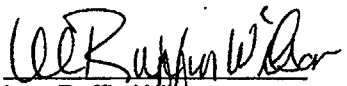
None.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories and Requests for Production *In Re: All Asbestos-Related Personal Injury or Death Cases Filed by Baron & Budd, P.C. or to be Filed by Baron & Budd, P.C. in Dallas County, Texas* was sent via Certified Mail, Return Receipt Requested, to the following counsel for Plaintiffs, on May 15, 2002.

Ben K. DuBose, Esquire
Baron & Budd, P.C.
The Centrum
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

May 15, 2002



Lee Ruffin Wilson
Ellin W. Grant
Bowers Orr L.L.P.
8910 Two Notch Road
Suite 400
Columbia, SC 29223

BOWERS ORR L.L.P.
ATTORNEYS AND COUNSELORS AT LAW
8910 TWO NOTCH ROAD, SUITE 400
POST OFFICE BOX 25389
COLUMBIA, SOUTH CAROLINA 29224

TELEPHONE
(803) 788-5220
TELEFAX
(803) 788-6767

MAY 21 02 *002005

May 16, 2002

Via Certified Mail, Return Receipt Requested
Ben K. DuBose, Esquire
Baron & Budd, P.C.
The Centrum
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

RE: Verification for Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories and Requests for Production of Documents *In Re: All Asbestos-Related Personal Injury or Death Cases Filed by Baron & Budd, P.C. or to be Filed By Baron & Budd, P.C. in Dallas County, Texas*

Dear Ben:

Enclosed please find the Verification for Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories and Requests for Production and "Attachment A" in the above referenced matter. This Verification supplements the Responses that were sent to you yesterday. The documents referenced in the Responses are being transmitted under separate cover.

Defense counsel of record are being notified of service by copy of this letter. Any defendants desiring copies of these responses may contact Bowers Orr L.L.P.

Sincerely,

Lee Ruffin Wilson

Lee Ruffin Wilson
Bowers Orr L.L.P.
Attorneys for Bondex International, Inc.

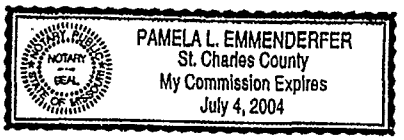
Enc.

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

PERSONALLY APPEARED before me John A. Fleming, who being duly sworn according to law, deposes and says that he is the President of Bondex International, Inc.; that he is authorized to make this affidavit on its behalf; that the information necessary to prepare the within Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories And Request For Production has come from his personal knowledge as well as from others and from the records of Bondex International, Inc.; that he does not necessarily have personal knowledge of all of the facts stated, but believes the same to be true and correct to the best of his knowledge, information and belief.

John A. Fleming

SWORN TO and subscribed before
Me this 15th day of May, 2002.
Pamela L. Emmenderfer (L.S.)
Notary/Public for Missouri
My Commission Expires: 7/4/04



MAY 21 02 002065

BOWERS ORR L.L.P.
ATTORNEYS AND COUNSELORS AT LAW
8910 TWO NOTCH ROAD, SUITE 400
POST OFFICE BOX 25389
COLUMBIA, SOUTH CAROLINA 29224

TELEPHONE
(803) 788-5220
TELEFAX
(803) 788-6767

May 15, 2002

Via Certified Mail, Return Receipt Requested
Ben K. DuBose, Esquire
Baron & Budd, P.C.
The Centrum
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

RE: Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories and Requests for Production of Documents *In Re: All Asbestos-Related Personal Injury or Death Cases Filed by Baron & Budd, P.C. or to be Filed By Baron & Budd, P.C. in Dallas County, Texas*

Dear Ben:

Enclosed please find Responses of Bondex International, Inc. to Plaintiffs' Master Interrogatories and Requests for Production and "Attachment A" in the above referenced matter. Defendant's Verification will be supplemented shortly. The documents referenced in the Responses are being transmitted under separate cover.

Thank you for graciously granting Bondex an extension of time in which to respond to these Interrogatories and Requests for Production.

Defense counsel of record are being notified of service by copy of this letter. Any defendants desiring copies of these responses may contact Bowers Orr L.L.P.

Sincerely,

Lee Ruffin Wilson
Bowers Orr L.L.P.
Attorneys for Bondex International, Inc.

Enc.