

FILE NAME: Garlock (GAR)

DATE: 0000

DOC#: GAR045

DOCUMENT DESCRIPTION: Legal - Defendant's Answers to Interrogatories

ANSWER: GARLOCK has operated the following plants which manufactured the asbestos-containing products identified in Exhibit B during certain time periods.

1. GARLOCK INC plant in Palmyra, New York. This was GARLOCK's principal manufacturing facility and has manufactured compressed asbestos sheet material from the early 1900's to the present. Asbestos packing products were also manufactured in Palmyra from the early 1900's to 1976. All style numbers listed on Exhibit B could be manufactured at the Palmyra plant during those years.
2. GARLOCK INC plant in Sodos, New York. GARLOCK manufactured braided asbestos packing products at this plant from 1976 to 1981. All packing products listed in Exhibit B could be manufactured at the Sodos facility.
3. Garlock of Canada owned and operated a manufacturing facility at 66 Jutland in Toronto, Canada from 1962 to 1991. This plant manufactured the compressed asbestos sheet and braided packing products listed in Exhibit B. From 1991 to the present, Garlock of Canada has operated a facility at 2860 Plymouth Drive in Oakville, Ontario. Asbestos-containing braided packing products were manufactured at that facility from 1991 to March 1999. Garlock of Canada has operated a plant at 4100 Rue Sherbrooke, Quebec, Canada from 1976 to the present. This plant manufactures and sells asbestos cloth and yarn. The compressed sheet and asbestos packing materials manufactured in Canada are not sold to customers in the United States.
4. Garlock de Mexico, SA de CV operates a plant in Mexico City, Mexico. The address is Apartado 15-103, Poinente 116, No. 511, Col Industrial Valleys, Silegarion Azapotynleo, 02300, Mexico DF. Garlock de Mexico has manufactured compressed asbestos sheet materials and braided compression packing from 1964 to the present. The compressed asbestos sheet materials manufactured in Mexico are primarily Style Numbers 900, 7021, 7405, 8748, 7006 and 7228. The braiding packing style numbers manufactured in Mexico are 117, 127, 150, 234, 731, 1019, 1020, 1021, 2601, 2602, 2603, 2611 and 5862. The asbestos-containing compression sheet and braided packing

materials manufactured in Mexico are not sold to customers in the United States.

5. GARLOCK PTY, Ltd. (Sealing Technology Division) has owned and operated a plant at 10 Willis Street in Arncliffe, Australia since 1970. They began selling asbestos-containing braided packing products in 1970. This entity never sold asbestos-containing products to customers in the United States.
6. GARLOCK INC owned an interest in a textile plant (E.R.I.C.A.) in Barcelona, Spain. This plant manufactured asbestos cloth and yarn and compression packing until March , 1979.
7. GARLOCK manufactured spiral wound gaskets at the former United States Gasket plant in Camden, New Jersey from 1955 to 1964 and at a plant in Gastonia, North Carolina from 1965 to 1987.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of 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.

ANSWER: GARLOCK has published numerous catalogs over the years for the purpose of marketing and advertising the product line.