

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

BETTY PEERENBOOM, ET AL

PLAINTIFFS

VS.

B. F. GOODRICH COMPANY, ET AL

DEFENDANTS

CIVIL ACTION NO.

PLAINTIFF'S INTERROGATORIES TO DEFENDANT,
B. F. GOODRICH, ET AL

Come the Plaintiffs, by Counsel, and pursuant to Rule 33, Federal Rule of Civil Procedure, propound the following interrogatories to Defendant, B. F. Goodrich, for its response within thirty (30) days of service hereof:

1. List all personnel within Defendant corporation's structure who had contact with personnel within the Manufacturing Chemists Association, hereafter MCA, in the period 1964-1974.

2. Who among the Defendant's personnel in the period 1964-1974 had knowledge of MCA's findings of potential health hazards connected with exposure to hydrocarbons, such as, vinyl chloride.

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3. List all personnel who had contact with officials of the Defendant Union in Louisville regarding possible health hazards to plant workers due to exposure to vinyl chloride.

4. List those union officials so advised (as outlined in #3, supra), when, where and how advised.

5. Attach hereto copies of any/all notice, warnings or such were given to Defendant Union or its members.

6. List whereabouts, title and availability of the following person within Defendant's corporation structure.

(a) W. E. McCormick

(b) P. J. Lawrence

(c) R. H. Wilson, M.D.

(d) M. W. Larson

(e) H. R. Pletch

(f) Maurice N. Johnson, M.D.

(g) Aton Vittone

Respectfully submitted,

RADOLOVICH, HARRINGTON & LEVY, P.S.C.


Attorney for Plaintiffs
Suite 200, 440 South Seventh Street
Louisville, Kentucky 40203
(502) 585-1168

CERTIFICATE

It is hereby certified that a true copy hereof was served, by first-class mail, this 10th day of November, 1982, on:

Honorable Stephen F. Schuster, 1200 One Riverfront Plaza, Louisville, Kentucky 40202, and
Honorable Kenneth Sales, 300 Marion E. Taylor Building, Louisville, Kentucky 40202.


Attorney for Plaintiffs