

IN RE: ALL ASBESTOS-RELATED
PERSONAL INJURY OR DEATH CASES
FILED BY BARON & BUDD, P.C. IN
FULTON COUNTY, GEORGIA

§ IN THE SUPERIOR COURTS
§
§ OF
§
§ FULTON COUNTY, GEORGIA

**QUIGLEY COMPANY, INC.'S RESPONSES TO PLAINTIFFS' MASTER
SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant QUIGLEY COMPANY, INC. ("Quigley"), by and through its undersigned attorneys, hereby responds to Plaintiffs' INTERROGATORIES (hereinafter "Interrogatories") and REQUEST FOR PRODUCTION OF DOCUMENTS (hereinafter "Requests") as follows:

GENERAL OBJECTIONS

1. Quigley objects to Plaintiffs' Interrogatories and Requests on the grounds that they are unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection and subject to the objections that follow, Quigley is providing information in response to Plaintiffs' Interrogatories and Requests.

2. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information relating to sales of asbestos-containing products by Quigley to any entity or entities other than entities specifically identified by Plaintiffs as having been in the chain of distribution of an asbestos-containing product from Quigley to Plaintiffs or Plaintiffs' employers.

3. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information relating to sales of asbestos-containing products by Quigley to any entity other than Plaintiffs' employer(s) or to any site where Plaintiffs do not claim exposure to any Quigley product, or are needlessly duplicative of prior discovery requests.

4. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information protected from discovery by the attorney-client privilege or the work-product doctrine or the provisions of the applicable Rules of Civil Procedure relating to trial preparation material.

5. Quigley objects to the Definitions and Instructions contained in Plaintiffs' Interrogatories and Requests and states that it will respond to them in accordance with the requirements of the applicable Rules of Civil Procedure, the pretrial orders of this Court, and normal English usage.

6. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek disclosure of information generated by persons other than Quigley that has come into the possession of Quigley's counsel during the course of discovery and trial preparation in asbestos-related litigation.

7. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information relating to products of any other company or manufacturer.

8. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information subsequent to Quigley ceasing production of any asbestos-containing product, or with respect to any asbestos-containing product to which Plaintiffs do not claim exposure.

9. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information under Plaintiffs control or prematurely seek information from Quigley before Quigley has had sufficient discovery from Plaintiffs to answer them.

10. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they seek information that is not under Quigley's custody or control or which is within the public domain or otherwise equally or more available to Plaintiffs than to Quigley.

11. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they assert unproven conclusions as established facts.

12. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they purport to require Quigley to gather and summarize information contained in voluminous papers that are already matters of public record.

13. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they purport to require Quigley to attach copies of documents or to create an index or list of documents for Plaintiffs' benefit.

14. Quigley objects to Plaintiffs' Interrogatories and Requests to the extent they assume the truth of allegations which are in dispute in this litigation or make incorrect and untrue assertions.

15. Quigley objects to Plaintiffs' Interrogatories and Requests as unduly and unfairly prejudicial and having no legitimate purpose to the extent they seek to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which he alleges exposure.

16. Many of the events about which Plaintiffs' Interrogatories and Requests inquire occurred 40 or more years ago. Accordingly, each Answer and Response that follows is qualified

by the fact that through the passage of time, information and documents that once existed may no longer be available.

17. To the extent applicable, Quigley incorporates by reference each of the foregoing General objections in each response that follows and reserves the right to amend or supplement its responses to Plaintiffs' Interrogatories and Requests to reflect information which may become available to it up until the time of trial.

Quigley's failure to make any objection, either in these general objections or in a specific response below, through inadvertence, ignorance of facts giving rise to such objection, or for any other reason, should not be considered a waiver of such objection.

Quigley reserves the right at any time to revise, correct, add to, supplement or clarify any of the responses to the individual Interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 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.

ANSWER: See General Objections. Subject to the objections set forth in the preliminary paragraphs of this response, this defendant states that various Quigley officers and outside counsel have participated in the preparation of responses to interrogatories and other discovery requests and provided information utilized in the preparation of certain of the responses of these interrogatories.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the 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 Georgia.

ANSWER: See General Objections. Expressly reserving and without waiving its objections, and subject to them, Quigley Company, Inc. ("Quigley") is a New York corporation; its principal place of business is 235 East 42nd Street, New York, New York 10017.

INTERROGATORY NO. 3:

If Defendant is disputing whether the Court has jurisdiction over Defendant in these action, please state whether Defendant has engaged in any of the following activities:

- a) Transaction business within the state;
- b) Committing a tortuous act or omission with this state, except as to cause of action for defamation of character arising from the act;
- c) Committing a tortuous injury in this state caused by an act or omission outside this state;
- d) Regularly doing or soliciting business, or engaging in any other persistent course of conduct, or deriving substantial revenue from good used or consumed or services rendered in this state; and
- e) Owning, using, or possessing any real property situated in this state;

ANSWER: Not applicable. Subject to the preliminary objections, Defendant is not disputing personal jurisdiction at this time.

INTERROGATORY NO. 4:

Other than the actions at issue in this litigation, has Defendant ever been involved in any action where a party alleged that Defendant engaged in the activities enumerated in the previous Interrogatory?

ANSWER: See General Objections. This defendant objects to this request on the grounds set forth in the preliminary paragraphs of this response and on the further grounds that it is overly broad, unduly burdensome and not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 5:

If Defendant is disputing whether the Court has jurisdiction over Defendant in these actions please state:

- a) Whether you have a registered agent for service of process in this state;
- b) Whether you have a office in this state;
- c) Whether you employ persons or independent contractors in this state;
- d) Whether you have shipped products to this state, either directly or through suppliers;
- e) Whether you received any income or revenue from the sale of products in or to

this state and how that income or revenue compares to the total received by you through the sale of such products;

- f) Whether you have participated in any civil litigation in this state;
- g) Whether you have negotiated or executed any contracts within the state; and
- h) Whether your officers and/or employees have traveled to this state on company business.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant is not disputing personal jurisdiction at this time.

INTERROGATORY NO. 6:

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 Fulton County asbestos litigation.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

Expressly reserving, and without waiving, its objections, and subject to them, to the best of Quigley's knowledge and information, no.

INTERROGATORY NO. 7:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to

discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 8:

If the answer to one or more of the last three Interrogatories is in the affirmative or lists any product, state as to named product the following:

- a) As to each product, state whether such product was mined, manufactured, marketed, distributed, installed, and/or sold;
- b) The names of the companies mining, manufacturing, marketing, distributing, installing, and/or selling each product mined, manufactured, marketed, distributed, installed and/or sold;
- c) The trade or brand name of each of those products mined, manufactured, marketed, distributed, installed 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; and
- j) Identify the last year that you sold each asbestos-containing product.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to

discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 2:

Please list by brand name and model number (including the type of product) each and every respiratory protection product which was manufactured, sold, designed, supplied, marketed, distributed, relabeled, and/or resold by you or for you by others. As to each product, state the following:

- a) The inclusive dates of production and sale of the product;
- b) All manufacturing locations and inclusive dates of manufacture at each locations;
- c) The physical characteristics, color, material composition, and appearance of the product, along with a full and precise description of the package in which the product was sold, including, but not limited to, the type of package, size, color, and writings, thereon;
- d) The identity of each and every known person and/or entity who distributed the product to job sites in the years during which the product was distributed by such person and/or entities, and the geographic distribution range of each product;
- e) If production, assembly, advertisement, sale or distribution of the product was ever temporarily ceased or discontinued, or if the product is not longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the name of the replacement product, if any, and the date the replacement product, if any, first went into production; and
- f) The identity of all sales and marketing literature, including brochures, catalogues, advertisements, owners' manuals, pamphlets or other material describing the products.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacture respiratory protection products.

INTERROGATORY NO. 10:

For each product identified in your response to the previous Interrogatory, please state whether the product, at any time, contained any instructions, warning labels, and/or inserts,

and with respect to each such instructions, warning label, and/or insert, state:

- a) The **inclusive** dates it accompanied the product;
- b) The **exact** physical size and wording of the instruction, warning label and/or insert;
- c) Whether the instruction, warning label, and/or insert was placed directly on the product and/or packaging and, if so, where the instruction, warning label, and/or insert was located on the product and/or packaging;
- d) All reasons why you provided the instruction, warning label, and/or insert with the product, and all the reasons for any changes or alterations in the instruction, warning label, and/or insert; and
- e) The identity of the person responsible for the design, configuration, placement or wording of the instruction, warning label and/or insert.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacture respiratory protection products.

INTERROGATORY NO. 11:

For each product identified in your answer to the previous Interrogatory, please state the upper limit of respirable asbestos dust concentration under which you content your respiratory protection products can be safely utilized, and identify all test, studies and/or other information upon which you rely to support your answer.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacture respiratory protection products.

INTERROGATORY NO. 12:

If you distributed and/or installed asbestos-containing products, please identify all job sites in Georgia **as well as** in those states in which Plaintiffs worked identified on Plaintiffs' Work History Sheets to which you distributed and/or installed such asbestos-containing products. With respect to each job site identified in your answer to this Interrogatory, please identify the type(s) of asbestos-containing product(s) distributed and/or installed by you at such job site, the brand name(s) of each type of asbestos-containing product distributed and/or installed by you at such job site, and the dates during which the asbestos-containing product(s) distributed and/or installed by you is or was present at such job site.

ANSWER: This defendant objects to this request on the grounds set forth in the

preliminary paragraphs of this response and on the further grounds that it is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence, particularly because it is not limited to transactions possibly relevant to this case. Further, Defendant objects to providing any information regarding jobsites in Georgia. Most of the Plaintiffs are Alabama residence with Alabama Jobsites. Without a specific showing that plaintiff worked at a Georgia jobsite the requested information is merely a fishing expedition that could not lead to the discovery of relevant or admissible evidence. Further, the interrogatory is oppressive and burdensome and would require Defendant to undertake a massive and extraordinarily costly search.

INTERROGATORY NO. 13:

For each and every job site identified by Plaintiffs on their Work History Sheets, please identify all job sites to which you distributed and/or installed asbestos-containing products. With respect to each job site identified in you answer to this Interrogatory, please identify the type(s) of asbestos-containing product(s) distributed and/or installed by you at such job site, the brand name(s) of each type of asbestos-containing product distributed and/or installed by you at such job site, and the dates during which the asbestos-containing product(s) distributed and/or installed by you is or was present at such job site.

ANSWER:

This defendant objects to this request on the grounds set forth in the preliminary paragraphs of this response and on the further grounds that it is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence, particularly because it is not limited to transactions possibly relevant to this case. Further, the interrogatory is oppressive and burdensome and would require Defendant to undertake a massive and extraordinarily costly search.

INTERROGATORY NO. 14:

If you marketed, distributed, sold, installed, and/or maintained boilers, turbines, steam pressure vessels, condensers, vapor pressure units, high pressure vessels, or any other heat pressure vessels, or any other heat exchange system, including any adjacent and/or peripheral

equipment necessary for the function of a vapor pressure unit, including, but not limited to, pipes, water tubes, air tanks, and cooling towers, please identify all job sites in Georgia as well as in those states identified on Plaintiffs' Work History Sheets to which you distributed and/or installed such asbestos-containing products. With respect to each job site identified in your answer to this Interrogatory, please identify the product(s) marketing, distributed, sold, installed, and/or maintained by you at such job site, including, but not limited, the model of the product, the model number of the product was marketed, distributed, sold, installed, and/or maintained by you at such job site, the type(s) of asbestos-containing product(s) each such product contained, and the type(s) of asbestos-containing products installed, marketed, distributed, and/or sold in order to maintain each such product, the brand name(s) of each type of asbestos-containing product identified which was installed, marketed, distributed, and/or sold in order to maintain each such product.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacturer boilers, turbines, steam pressure vessels, condensers, vapor pressure units, high pressure vessels, or any other heat pressure vessels, or any other heat exchange system, including any adjacent and/or peripheral equipment necessary for the function of a vapor pressure unit, including, but not limited to, pipes, water tubes, air tanks, and cooling towers.

INTERROGATORY NO. 15:

For each and every job site identified by Plaintiffs on their Work History Sheet, please identify all job sites to which you marketed, distributed, sold, installed, and/or maintained boilers, turbines, steam pressure vessels, condensers, vapor pressure units, high pressure units, or any other heat exchange system, including any adjacent and/or Peripheral equipment necessary for the function of a vapor pressure unit, including, but not limited to, pipes, eater tubes, air tanks, and cooling towers. With respect to each job site identified in your answer to this Interrogatory, please identify the type(s) of asbestos-containing products distributed and/or installed by you at such job site, the brand name(s) of each type of asbestos-containing product distributed and /or installed by you at such job site, and the dates during which the asbestos-containing product(s) distributed and/or installed by you is or was present at such job sites.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacturer boilers, turbines, steam pressure vessels, condensers, vapor pressure units, high pressure vessels, or any other heat pressure vessels, or any other heat exchange system, including any adjacent and/or peripheral equipment necessary for the function of a vapor pressure unit, including, but not limited to, pipes, water tubes, air tanks, and cooling towers.

INTERROGATORY NO. 16:

If you manufactured, marketed distributed, and/or sold friction products, including, but not limited to, brakes and clutches, please state:

- a) The type of product manufactured, marketed, distributed, and/or sold by you;
- b) The date the product first went into production;
- c) The last date that the product was produced;
- d) The last date that the product was sold.
- e) All manufacturing locations of the product;
- f) The asbestos-containing component and/or part contained in the product;
- g) The percentage of asbestos in each asbestos-containing component and/or part;
and
- h) The type of asbestos fiber in each asbestos-containing component and/or part.

ANSWER: Not applicable. Subject to the preliminary objections, Defendant did not manufacture friction products, including, but not limited to, brakes and clutches.

INTERROGATORY NO. 17:

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 identified in your answers to these Interrogatories 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and

where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 18:

Before distributing, selling, or placing the products identified in your answers to these Interrogatories into the stream 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 tests or involved with conducting the test; and
- c) The results of the tests.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 19:

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 identified in your answers to these Interrogatories 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 documents, and where it is presently located.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence,

and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 20:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modification as a result of those tests identified in your answers to these Interrogatories? 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 of 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 21:

After releasing the products identified in you answers to the these Interrogatories 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 test;

- b) The name, address, and job title of each person who conducted those tests;
- c) The results of those test;
- 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 22:

Do any documents, including, but not limited to, written memoranda, specifications, recommendation, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products identified in you answers to these Interrogatories now exist? If so, state:

- a) The name of each product;
- b) A description of each document and how it relates to each product; and
- c) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 23:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests identified in your answers to these Interrogatories? If the answer is affirmative, state:

- a) The 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 24:

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 of any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products identified in your answers to these Interrogatories? 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 materials can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, see Answer to Interrogatory No. 10.

INTERROGATORY NO. 25:

Before 1970, had you received notice that any individual or individuals 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks

to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 26:

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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, Quigley states to the best of its knowledge and information, no.

INTERROGATORY NO. 27:

Did you or any of your predecessor, successors, or subsidiaries have any distributors or sales representatives of asbestos products in Georgia as well as in those states identified on Plaintiffs' Work History Sheets? 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; and
- c) What product were distributed, marketed, or sold and in what years.

ANSWER: This defendant objects to this request on the grounds set forth in the preliminary paragraphs of this response and on the further grounds that it is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence, particularly because it is not limited to transactions possibly relevant

to this case. Further, Defendant objects to providing any information regarding jobsites in Georgia. Most of the Plaintiffs are Alabama residence with Alabama Jobsites. Without a specific showing that plaintiff worked at a Georgia jobsite the requested information is merely a fishing expedition that could not lead to the discovery of relevant or admissible evidence. Further, the interrogatory is oppressive and burdensome and would require Defendant to undertake a massive and extraordinarily costly search.

INTERROGATORY NO. 28:

List each employee 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 hazard of asbestos.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, Quigley did not employ a chief or corporate medical officer; the plant manager had primary responsibility for employee safety.

INTERROGATORY NO. 29:

Does Defendant have in its possession any books, pamphlets, memoranda, or written material 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; and

- d) The name, job title, and address of each person who currently has possession of each publication and its present locations.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 30:

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 seller 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 of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations; and
- d) Whether any of those publications are still in your possession, and if so:
 - (i) A description of the publications, including the date;
 - (ii) The current location of such publications;
 - (iii) The custodian of such publications; and
 - (iv) The method or manner in which such publications are maintained.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks

to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 31:

Identify by name and location each plant or manufacturing facility in which the products identified in your answer to these Interrogatories 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 32:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents 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; and
- d) The media used to disseminated the sales materials.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is

neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 33

Did Defendants or its predecessors or subsidiaries provide any information to the United States Patent Office regarding any asbestos-containing products identified by Defendant in the answers to these Interrogatories. If so, please identify:

- a) The information provided;
- b) All documents and other materials provided; and
- c) Any and all communications Defendants had with any employee and/or representative of the United States Patent Office.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 34:

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 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; and
- d) The year each such written material or instruction was prepared and disclosed to potential customers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 35:

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 supplemental as to the remaining amount of coverage).

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

Expressly ~~reserving~~, and without waiving, its objections, and subject to them, Quigley states that copies of policies of liability insurance will be made available for Plaintiff's inspection at Quigley Company, Inc.'s offices at 235 East 42nd Street, New York, New York 10017 at a mutually convenient time after Plaintiffs provide identifying information and describe the product or products to which Plaintiffs allege exposure and the place at which the alleged exposure occurred.

INTERROGATORY NO. 36:

As to the disease asbestosis, state:

- a) The date on which 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 in any written form;
- f) Who is the custodian of such information and
- g) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, as impermissibly seeking legal and medical opinions and conclusions, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 37:

As to the disease lung cancer, state:

- a) The date on which 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;
- d) What information was disseminated within Defendant's company or its subsidiaries or predecessor regarding such adverse consequences or effects;
- e) Whether any such information is still maintained by Defendant or its subsidiaries or predecessors in any written form;
- f) Who is the custodian of such information; and
- g) The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, as impermissibly seeking legal and medical opinions and conclusions, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 38:

As to the disease pleural thickening or pleural plaques, state:

- a) The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans;
- b) How Defendants 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 any written form;
- f) Who is the custodian of such information; and
- g) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, as impermissibly seeking legal and medical opinions and conclusions, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 39:

As to the disease mesothelioma, state:

- a) The date on which Defendant or its subsidiary or predecessor 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** asbestos exposure;
- e) What information was disseminated within 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 any written form;

- g) Who is the custodian of such information; and
- h) Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, as impermissibly seeking legal and medical opinions and conclusions, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 40:

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 disease was 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 inhalations;
- d) What information was disseminated within Defendant's company or its subsidiary? or predecessor in any written form;
- f) Who is the custodian of such information; and
- g) The date on which you first received knowledge of information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence,

where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 43:

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 product? Is 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 such agreement;
- d) The volume, in dollar amount, of each transaction; and
- e) The initial purchaser of the products.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, Quigley states to the best of its knowledge and information, no.

INTERROGATORY NO. 44:

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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence,

and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 45:

Does Defendant or any of its subsidiary or predecessor companies currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 43? 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; and
- b) A brief description of each such document, including the dates and the parties Signatory.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, see Answer to Interrogatory No. 43.

INTERROGATORY NO. 46:

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; and

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 47:

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; and
- f) Whether the minutes were abstracted

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 48:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 49:

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; and
- c) The format in which the documents are kept, *i.e.*, by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred. Expressly reserving, and without waiving, its objections, and subject to them, Quigley states that its records are maintained by Quigley's custodian of records at Quigley's offices in New York.

INTERROGATORY NO. 50:

Will 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; and
- c) List any and all previous times that the named witnesses 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 Plaintiff's in that case.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the

date and place at which the alleged exposure, if any, occurred. Expressly reserving, and without waiving, its objections, and subject to them, Quigley will identify its witnesses in accordance with the Court's schedule.

INTERROGATORY NO. 51:

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; and
- e) Whether or not the business entity was ever authorized to transact business in this state.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 52:

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 sale or distribution and before reaching the user.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is

neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 53:

For each asbestos-containing product identified in your answers to these Interrogatories, identify all foreseeable users, such as insulators, helpers, pipe fitters, welders, machinists, plasters, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 54:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of 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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is

neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 55:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 56:

Before 1970, did you or your 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 started, the purpose of such procedures, and all results of such procedures.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to

discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 57:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 58:

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; and
- d) The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to

discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 59:

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 in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 60:

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; and

d) State the duties and responsibilities of such Medical Department.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred. Expressly reserving, and without waiving its objections, and subject to them, see Answer to Interrogatory No. 28.

INTERROGATORY NO. 61:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred. Expressly reserving, and without waiving, its objections, and subject to them, Quigley states at all relevant times, the purchasers and users of Quigley asbestos-containing product knew that asbestos was an ingredient and had all necessary information, and Quigley communicated such information as it received it directly to all actual and prospective purchasers, including alerting them, in a series of notices issued beginning no later than 1972, of OSHA requirements for the handling and use of asbestos-containing products. Soon thereafter, in late 1973/early 1974, Quigley ceased the sale and manufacture of asbestos-containing product altogether.

INTERROGATORY NO. 62:

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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 63:

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? Is so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 64:

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 the recall; and

d) The purpose for the recall.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 65:

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 66:

Have any products you identified in your answers to these Interrogatories not performed as intended? Please list all such products that have not performed as intended.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence,

and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 67:

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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 68:

As to either the threshold limit values or maximum allowable concentration 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; and
- (c) How Defendant received notice of such limits or concentrations.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks

to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 69:

Were the threshold limit values or maximum allowable concentrations inquired about in the previous Interrogatory for total dust, and not asbestos dust alone?

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 70:

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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when Plaintiffs claim such exposure, if any, occurred.

INTERROGATORY NO. 71:

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 witness that you may 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 in subparagraph (a) above has provided a report or other documentation to you, and if so, identify and produce each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above; and
- (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.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred. Expressly reserving, and without waiving, its objections, and subject to them, Quigley will identify its expert witnesses in accordance with the Court's schedule.

INTERROGATORY NO. 72:

Please state the name, present address and present telephone number, along with the experience and qualification, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases including, 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; and

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

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 73:

When, if ever, did Defendant or any of its predecessors-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 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 responses;

(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. 73(e) above; and

(g) If your answer to 73(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 64(e) above?

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 74:

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 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 responses;

(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. 74(e) above; and

(g) If your answer to 74(e) is yes, when was the first date Defendant relied on the

Dreessen Report in whole or in part for the proposition stated in 64(e) above?

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

INTERROGATORY NO. 75:

Please identify all documents and other tangible things, including, but not limited to, exhibits, video tapes, audio tapes, materials, and/or demonstrative aids, which support or refute any of Plaintiffs' claims in these actions.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

Expressly reserving, and without waiving, its objections, and subject to them, Quigley will identify its exhibits in accordance with the Court's schedule.

INTERROGATORY NO. 76:

Please identify all documents and other tangible things, including, but not limited to, exhibits, video tapes, audio tapes, materials, and/or demonstrative aids, which support or refute any of Defendant's defenses, including, but not limited to, affirmative.

ANSWER: See General Objections. Quigley further objects to this Interrogatory as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence,

and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

Expressly reserving, and without waiving, its objections, and subject to them, Quigley will identify its exhibits in accordance with the Court's schedule.

**QUIGLEY COMPANY, INC., RESPONSES TO PLAINTIFFS'
REQUEST FOR PRODUCTION OF DOCUMENTS**

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answers to Plaintiffs' Interrogatories.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before Plaintiff has fully submitted to discovery and described the product or products, if any, to which he alleges exposure and the date and place at which the alleged exposure, if any, occurred.

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 in your answer to Interrogatory No. 2.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to

require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 3:

All documents which support, contradict, or are otherwise relevant to Plaintiff's claims of exposure to Defendant's products at any jobsite identified in Plaintiff's responses to discovery.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred

REQUEST FOR PRODUCTION NO. 4:

All documents identified in your answers to Plaintiffs' Interrogatories.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 5:

All documents supporting your answer to Interrogatory No. 3.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither

relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 6:

All documents supporting your answer to Interrogatory No. 5.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 7:

All documents supporting your answer to Interrogatory No. 9.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 8:

All documents supporting your answer to Interrogatory No. 12.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 9:

All documents supporting your answer to Interrogatory No. 13.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 10:

The current curriculum vitae and/or resume of all testifying experts identified by you in your answers to Plaintiffs' Interrogatories or in your Witness List served pursuant to Standing Order Number One.

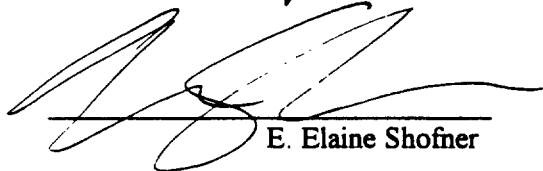
RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

REQUEST FOR PRODUCTION NO. 11:

All documents and other tangible things identified by you in your answer to Interrogatory No. 75.

RESPONSE: See General Objections. Quigley further objects to this Request as vague, ambiguous, overly broad and unduly burdensome, as seeking information that is neither relevant nor calculated to lead to the discovery of relevant and admissible evidence, and as unduly and unfairly prejudicial and having no legitimate purpose to the extent it seeks to require Quigley to provide identifying information before plaintiffs have fully submitted to discovery and described the product or products, if any, to which they claim exposure and where and when plaintiffs claim such exposure, if any, occurred.

This 7 day of Apr, 1999.



E. Elaine Shofner

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**Counsel for
QUIGLEY COMPANY, INC.**

**IN RE: ALL ASBESTOS-RELATED
PERSONAL INJURY OR DEATH CASES
FILED BY BARON & BUDD, P.C. IN
FULTON COUNTY, GEORGIA**

**§ IN THE SUPERIOR COURTS
§
§ OF
§
§ FULTON COUNTY, GEORGIA**

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

COUNSEL FOR QUIGLEY COMPANY, INC. has this day served Plaintiff's counsel, Mary E. Skelnik, Esq. and Kenneth S. Canfield, Esq. with a true and accurate copy of **DEFENDANT QUIGLEY COMPANY, INC.'S RESPONSES TO PLAINTIFFS' MASTER SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS** by posting same in the U.S. Mail with adequate postage thereon.

I also certify that all counsel on attached service list on this date are being notified of this filing by depositing same in the United States Mail.

This 7 day of Jan, 1999.


E. Elaine Shofner

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