

MAR-21

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

IN RE: ALL BARON & BUDD CASES	:	ASBESTOS MASTER CASE
IN WHICH MAREMONT CORPORATION	:	NUMBER 073958
IS NAMED AS DEFENDANT	:	
	:	
Plaintiffs,	:	(JUDGE HARRY A. HANNA)
	:	
-vs-	:	
	:	
A-BEST PRODUCTS COMPANY, ET AL.,	:	
	:	
Defendants.	:	

MAREMONT'S RESONSES TO PLAINTIFFS'
REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO MAREMONT CORPORATION

Defendant Maremont Corporation ("Maremont") hereby responds to Plaintiffs' Requests for Production of Documents ("discovery requests") without conceding, in any fashion, that any of the discovery requests request information that is either relevant or admissible as evidence in this action. Furthermore, Maremont has not completed its investigation of the facts relating to this case and has not completed its preparation for trial. As such, Maremont's responses to these discovery requests are given without prejudice to Maremont's right to produce evidence of any and all subsequently discovered facts and/or documents at the time of trial or at any other time.

PRELIMINARY STATEMENT

Maremont, One Noblitt Plaza, Columbus, Indiana 47201, incorporated in the State of Delaware, is primarily engaged in the manufacture and distribution of automotive exhaust systems, shock absorbers, MacPherson struts and related hardware and parts.

On or about December 15, 1953, Maremont purchased the assets of a company with a manufacturing facility located in Paulding, Ohio, known as the Grizzly Manufacturing Company ("Grizzly"). During its ownership of the Paulding facility, Maremont manufactured drum brake linings, clutch facings and disc brake pads. Maremont sold this division on or about June 30, 1977, to Nuturn Corporation.

Soon after the purchase by Nuturn, Nuturn closed the Paulding facility and transferred the manufacturing operation to a facility in Smithville, Tennessee. At this time, Maremont does not have in its employ any person or persons who previously worked at the Paulding facility. Furthermore, it appears that very few Maremont employees continued employment with Nuturn. Very little documentation exists within Maremont concerning the Paulding, Ohio operation. Any documentation pertaining to the site that was not discarded by Nuturn upon its move to Smithville would presumably be under the custody and control of Nuturn Corporation.

GENERAL OBJECTIONS

1. Maremont objects to plaintiffs' discovery requests on the grounds that they are overbroad, vague, unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs' discovery requests have been propounded indiscriminately to every defendant without any attempt to tailor them to any individual

defendant. Without waiving this objection and subject to the objections that follow, Maremont is providing information in response to plaintiffs' discovery requests.

2. Maremont objects to plaintiffs' discovery requests on the grounds that they improperly attempt to shift the burden of establishing product identification and causation from plaintiff to Maremont.

3. Maremont objects to plaintiffs' discovery requests to the extent they seek information relating to sales of asbestos-containing products by Maremont 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 Maremont to plaintiffs or plaintiffs' employers.

4. Maremont objects to plaintiffs' discovery requests to the extent they seek information protected from discovery by the attorney-client privilege or the work product doctrine.

5. Maremont objects to plaintiffs' discovery requests to the extent they seek disclosure of information generated by persons other than Maremont that has come into the possession of Maremont's counsel during the course of discovery and trial preparation in asbestos-related litigation.

6. Maremont objects to plaintiffs' discovery requests to the extent they seek information relating to products of other companies.

7. Maremont objects to plaintiffs' discovery requests to the extent they seek information subsequent to Maremont ceasing production of any asbestos-containing product.

8. Maremont objects to plaintiffs' discovery requests to the extent they seek information that is not under Maremont's custody or control or which is within the public domain or otherwise equally available to plaintiffs as to Maremont.

9. Many of the events about which plaintiffs' discovery requests inquire occurred forty or more years ago. Accordingly, each 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.

10. Maremont does not concede that any of its responses to plaintiffs' discovery requests are or will be admissible evidence at a trial of this action, and Maremont does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

11. To the extent applicable, Maremont incorporates by reference each of its objections in each response that follows and reserves the right to amend or supplement its responses to plaintiffs' discovery requests to reflect information which may become available to it up until the time of trial.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

12. Maremont objects to the definitions supplied by plaintiffs with regard to these interrogatories and document requests on the grounds that the definitions are overly broad, vague, and often inconsistent with the normal usage and meaning of such words. These definitions constitute an unreasonable expansion of the requests themselves. Maremont has therefore responded to the interrogatories and document requests in the manner consistent with a normal understanding of the language used in the response and to the extent necessary to fairly and fully respond to the interrogatories and requests.

13. Maremont objects to plaintiffs' definitions on the grounds that the terms "product containing asbestos fibers," "asbestos-containing products" and "asbestos products" are so broad,

vague, ambiguous, uncertain, and calls for speculation, that Maremont cannot determine the precise nature of the information sought, and therefore cannot respond without an unreasonable risk of inadvertently providing a misleading, confusing, inaccurate, or incomplete response.

14. Maremont objects to plaintiffs' definitions to the extent those definitions and instructions request Maremont to make any inquiry beyond that which is required by the Ohio Rules of Procedure or to the extent they seek to include documents not within Maremont's custody or control.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph or picture of each asbestos-containing product that Defendant has ever mined, manufactured, sold, marketed, installed, and/or distributed.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 2:

Please produce a true and correct copy of each document which reflects sales of those asbestos-containing products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 3:

Please produce a true and correct copy of each document which reflects sales of Defendant's asbestos-containing products to companies that may have distributed, packaged, labeled, and/or sold Defendant's asbestos-containing products.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 4:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 5:

Please produce a true and correct copy of each record and/or contract which reflects the sales of Defendant's asbestos-containing products to distributors and marketers who may have called on any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 6:

Please produce a true and correct copy of each contract and/or work order that reflects contracts for Defendant to have asbestos-containing products installed or removed at any of the job sites listed on Exhibit A, attached hereto.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 7:

Please produce a true and correct copy of each work order and contract that reflects contract business between Defendant and any of the job sites listed on Exhibit A, attached hereto, for the application of asbestos-containing products.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 8:

Please produce a true and correct copy of each document relating to the design and preparation of the asbestos-containing products listed in Defendant's answer to Interrogatory No. 5.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 9:

For each product listed in response to Interrogatory No. 5, please produce a copy of all tests that were conducted to determine any potential health hazards involved in its use or exposure (this Request for Production relates to Plaintiffs' Interrogatory No. 18 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 18.

REQUEST FOR PRODUCTION NO. 10:

Please produce a true and correct copy of all documents relating to the testing of any product which Defendant listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 19 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 11:

Please produce a true and correct copy of all tests which Defendant conducted and/or has in its possession to determine potential health hazards involved in the use of or exposure to asbestos products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 21 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 21.

REQUEST FOR PRODUCTION NO. 12:

Please produce a true and correct copy of all studies which Defendant conducted or caused to be conducted concerning the effects of the inhalation of asbestos dust and/or fibers in workers or other persons using, working with and/or around, installing and/or applying any of the asbestos products mined, manufactured, sold, distributed, marketed, installed and/or relabelled for distribution by Defendant or Defendant's predecessor (this Request for Production relates to Plaintiffs' Interrogatory No. 22 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 22.

REQUEST FOR PRODUCTION NO. 13:

Please produce a true and correct copy of all documents relating to any studies made or caused to be made by Defendant, to determine whether the asbestos-containing products mined, manufactured, sold, marketed, installed or distributed by Defendant or Defendant's predecessor would be hazardous to people (this Request for Production relates to Plaintiffs' Interrogatory No. 23 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No: 23.

REQUEST FOR PRODUCTION NO. 14:

Please produce a true and correct copy of all tests in the field which Defendant conducted or caused to be conducted to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees or other workers removing and/or tearing out asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 24 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 24.

REQUEST FOR PRODUCTION NO. 15:

Please produce a true and correct copy of each test which Defendant conducted or caused to be conducted regarding the quantity, quality, or threshold limit value of asbestos dust, fibers, and/or particles to which workers were exposed while using, working with and/or around, installing and/or applying Defendant's asbestos-containing products (this Request for Production relates to Plaintiffs' Interrogatory No. 31 previously propounded to Defendant in this litigation).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 31.

REQUEST FOR PRODUCTION NO. 16:

For each product listed in response to Interrogatory No. 5, please produce a true and correct copy of all promotional or sales material including, but not limited to, brochures, pamphlets, catalogs, packaging, or other written materials of any kind or character.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 17:

Please produce a true and correct copy of all warnings, cautions, caveats or directions concerning the possible health effects of the products listed in response to Interrogatory No. 5 (this Request for Production relates to Plaintiffs' Interrogatory No. 41 previously propounded to Defendant).

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 18:

Please produce a true and correct copy of all written materials prepared by Defendant or Defendant's predecessors or any of Defendant's subsidiaries indicating how the products listed in response to Interrogatory No. 5 should be used or maintained by the ultimate user (this Request for Production relates to Plaintiffs' Interrogatory No. 43 previously propounded to Defendant).

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 19:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products mined, manufactured, sold, marketed, installed, or distributed by Defendant (this Request for Production relates to Plaintiffs' Interrogatory No. 48 previously propounded to Defendant).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 48.

REQUEST FOR PRODUCTION NO. 20:

Please produce a true and correct copy of statements from all people with knowledge of relevant facts to this lawsuit.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 21:

Please produce a true and correct copy of all documents which mention, allude or refer to tests performed on breathing devices to prevent the inhalation of asbestos dust and/or fibers (this Request for Production relates to Plaintiffs' Interrogatory No. 52 previously propounded to Defendant).

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 22:

Please produce a true and correct copy of all reports by experts that Defendant may call upon at the trial of this case (this Request for Production relates to Plaintiffs' Interrogatory No. 53 previously propounded to Defendant).

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont has not yet determined what expert witnesses it will call at the trial of this case. Maremont will supplement this response at such time, or in accordance with the Court's scheduling order or agreement between the parties.

REQUEST FOR PRODUCTION NO. 23:

Please produce a true and correct copy of all policies of insurance under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 24:

Please produce a true and correct copy of all notices received by Defendant prior to 1968 that any person was claiming an injury or had sustained an abnormal x-ray reading as a result of using asbestos-containing products, regardless of the manufacturer or seller of the products.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 25:

Please produce a true and correct copy of all documents, correspondence or communications pertaining to all marketing, sales, negotiations, delivery or distribution of all of your asbestos-containing or industrial insulation products to all Defendants to this lawsuit other than the answering Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request. Maremont further refers plaintiffs to its response to Interrogatory No. 47.

REQUEST FOR PRODUCTION NO. 26:

Please produce a true and correct copy of all documents memorializing or referring, relating or pertaining to communications or correspondence among and/or between your officers, director, agents, representatives, employees or consultants and any employer, purchaser or user of your asbestos-containing products, its officers, directors, agents, representatives, employees or consultants which in any way relates, refers or pertains to asbestos, asbestos-containing products, pneumoconiosis, asbestos-related illness, injury or disease, dust or workplace health or safety.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 27:

Please produce a true and correct copy of all annual reports of Defendant to employees or stock holders for the years 1960 through 1969 and for the past five years.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that the information sought is publicly available.

REQUEST FOR PRODUCTION NO. 28:

Please produce the originals or true and correct copies of all safety or health manuals, pamphlets or brochures issued by Defendant between 1930 and the present and any documents relating to whom said manuals were issued.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 29:

Please produce a true and correct copy of all safe workplace practices manuals, pamphlets or brochures issued by Defendant from 1900 through the present.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 30:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Industrial Health Foundation or the Industrial Hygiene Foundation in the custody, possession or control of Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 31:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Trudeau Institute and Saranac Lake Laboratory in the custody, possession or control of Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 32:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Quebec Asbestos Mining Association (QAMA) in the custody, possession or control of Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 33:

Please produce a true and correct copy of all documents referring, relating or pertaining to the National Insulation Manufacturers Association (NIMA) in the custody, possession or control of Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 34:

Please produce a true and correct copy of all documents referring, relating or pertaining to the Thermal Insulation Manufacturers Association (TIMA) in the custody, possession or control of Defendant.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 35:

Please produce a true and correct copy of all documents relating to any conferences, symposia, or meetings attended by any of your officers, physicians, agents, servants, employees or consultants which in any way considered, discussed, reviewed or made recommendations concerning asbestos-related illness, injury or disease; pneumoconiosis; occupational lung disease; dust; industrial hygiene; and/or worker or workplace health or safety.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 36:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons from actual or alleged hazards associated with asbestos exposure.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not

reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 37:

Please produce a true and correct copy of all documents to and/or from Defendant and any person, organization, institution, laboratory, foundation, corporation, entity, board or consultants which refer, relate or pertain to air quality studies, dust counts or dust studies, alleged maximum allowable concentrations (MAC), alleged threshold limit values (TLV) or protection of your employees or any other employees or persons.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 38:

Please produce a true and correct copy of all documents to and/or from Defendant involving any physician, industrial hygienist or public health specialist which in any way relates, refers or pertains to asbestos-related injury, illness or disease, pneumoconiosis, occupational lung disease, dust, industrial hygiene or worker or workplace health or safety.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the

grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 39:

Please produce a true and correct copy of all photographs, pictures, prints or any visual depiction at any time generated showing workers or any person or persons installing, applying, removing or in any manner handling or utilizing an asbestos-containing product at any time manufactured, sold or distributed by Defendant.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 40:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product manufacturing facility or asbestos-containing product or product line.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing

Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 41:

Please produce a true and correct copy of all documents pertaining to the acquisition, purchase or sale by Defendant of any asbestos-containing product from any other Defendant in this case or to any other Defendant in this case.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 42:

For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, the cross-claims or counter-claims of any party against Defendant, produce each and every document which will be offered to prove each and every affirmative defense. For each and every allegation of Defendant in cross-claim(s) asserted by Defendant in this litigation, produce each and every document which will be offered to prove each and every allegation in Defendant's cross-claim(s).

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in

Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 43:

Please produce a true and correct copy of every transcript of testimony of each witness Defendant intends to call at trial.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont has not yet determined what non-expert witnesses it will call at the trial of this case. Maremont will supplement this response at such time, or in accordance with the Court's scheduling order or agreement between the parties.

REQUEST FOR PRODUCTION NO. 44:

Please produce a true and correct copy of each and every medical record in the custody, possession or control of Defendant relating to Plaintiffs in this case other than those medical records produced by Plaintiffs and provided to Defendants in this case.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 45:

Please produce a true and correct copy of each and every document or other tangible item upon which Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

RESPONSE:

See general objections. Maremont also objects to this interrogatory to the extent it seeks disclosure of information protected by the applicable privileges and immunities, and on the grounds that it is overbroad and unduly burdensome, vague and ambiguous, not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, documents, if any, responsive in whole or in part to this request, may be contained in materials in Maremont's possession that will be made available to plaintiff at a time and place to be agreed upon between the parties.

REQUEST FOR PRODUCTION NO. 46:

Please produce a true and correct copy of each and every document, recording or other tangible item that constitutes in whole or in part a statement by Plaintiffs or a statement by any of Plaintiffs' witnesses in this matter.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 47:

Please produce a true and correct copy of each and every photograph, videotape recording or other tangible item that is a photographic representation of Plaintiffs in this matter.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 48:

Please produce a true and correct copy of all work records or other tangible items relating to Plaintiffs or their employers.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 49:

Please produce a true and correct copy of every transcript, affidavit or sworn statement by each and every witness called by Defendant in any litigation related to insurance that may cover the claims in this case.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 50:

For each document for which any privilege is asserted, produce an index containing the following information:

- (a) Author of document;
- (b) Position, title or affiliation of author;

- (c) Date of document;
- (d) Each recipient of the document
- (e) The position, title or affiliation of each recipient of the document;
- (f) The subject matter of the document with sufficient specificity to determine the matters discussed therein; and
- (g) The privilege(s) asserted.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont does not possess any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 51:

If Defendant claims that the documents are too voluminous to produce as requested, provide the following:

- (a) The numerical amount of documents responsive to requests herein;
- (b) The method of storage of documents responsive to requests herein;
- (c) The method of organization of documents responsive to requests herein;
- (d) The location of documents responsive to requests herein;
- (e) Whether there is an index or indices, lists, inventories, or other such information for records responsive to requests herein;
- (f) If there is an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein is printed, or electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.).
- (g) If the index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or

other such information for records responsive herein is electronically stored, (i.e. listed in a computer, imaged, part of a database, etc.), the method of such storage and software used to create and/or maintain said an index, indices, lists, inventories or other such information for records responsive to requests herein, whether such index, indices, lists, inventories or other such information for records responsive herein.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont states that it does not make such claim.

REQUEST FOR PRODUCTION NO. 52

If any answer to requests herein is subject to an ongoing investigation or continuing discovery, provide the following information:

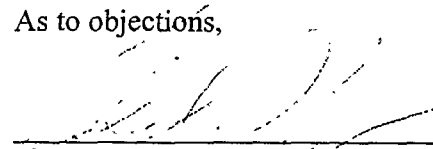
- (a) The person or persons responsible for the ongoing investigation or continuing discovery;
- (b) The means or methods used or being used for the ongoing investigation or continuing discovery;
- (c) The beginning date of such ongoing investigation or continuing discovery.

RESPONSE:

See general objections. Maremont also objects to this request on the grounds that it is overly broad and unduly burdensome, vague and ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing Preliminary Statement and to the general and specific objections, and without waiving same, Maremont

responds as follows: Maremont is unaware of "an ongoing investigation or continuing discovery" other than those ordinarily taking place in the course of litigation. Maremont reserves the right to supplement this response upon completion of this review and of further discovery.

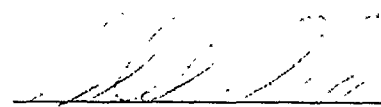
As to objections,



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1900 East Ninth Street
Cleveland, OH 44114
(216) 621-0200
(216) 696-0740 Fax
epapp@bakerlaw.com
Counsel for Maremont Corporation

CERTIFICATE OF SERVICE

A copy of the foregoing DEFENDANT MAREMONT CORPORATION'S RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS was sent via regular U.S. mail to Ladd R. Gibke, Esq., Baron & Budd, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219, this ____ day of August, 2002. In addition, a Verification of Service was electronically filed on the CLAD system on August ____, 2002, and deemed served on all parties pursuant to Cuyahoga County Rules of Court.



Counsel for Defendant
Maremont Corporation

EXHIBIT A
BARON & BUDD SITE LIST

Adams Eng., Cleveland, OH
Adco Chemical & Supply Co., Columbus, OH
Aeronca Aircraft Corp., Middletown, OH
Akron Reserve Lumber, Akron, OH
Allegeny Power System, New Martinsville, WV
Alliance Machine Co., Alliance, OH
Alliance Ware, Alliance, OH
Alliance Yard, Alliance, OH
Aluminum Corp., Cleveland, OH
Aluminum Smelter, Hamilton, OH
American Bakeries Plant, Cincinnati, OH
American Firebrick Co., Cleveland, OH
American International Aluminum Corp., Warren, MI
American Shipbuilding Co.
American Steel & Wire, Cleveland, OH
American Steel Foundry, Alliance, OH
American Zinc & Chemical Co., Langeloth, PA
American Roller Co., Cincinnati, OH
American Packaging Corp. - a/k/a Interstate Folding Box, Middletown, OH
Anchor Hocking Glass, Plant One, Lancaster, OH
Anchor Hocking Glass, Plant Two, Lancaster, OH
Anchor Hocking Glass, Lancaster, OH
Anchor Hocking Glass, Bremen, OH
Anchor Hocking Glass, Clarksburg, WV
Anchor Hocking Glass, Winchester, OH
Anchor Hocking Glass, Monaca, PA
Apex Powder Corp., Canton, OH
Apex Smelting Co., Cleveland, OH
A.P. Green, North Lawrence, OH
Armco Steel, Hamilton, OH
Armco Steel, Washington Courthouse, OH
Armco Steel, Muskingham County, OH
Armco Steel, Middletown, OH
Armco Steel, Houston, TX
Armco Steel, Ambridge, PA
Armco Steel, Mt. Coal, WV
Armco Steel, Ashland, KY
Armco Steel, New Miami, OH
Armco Steel, Piqua, OH :
Armco Steel, Butler, PA

Armco Steel, Marion, OH
Armco Steel, Pittsburgh, PA
Ashland Oil, Middletown, OH
Ashtabula Yard, Ashtabula, OH
Associated Paper Products, Germantown, OH
Atlantic Foundry, Wadsworth, OH
B. F. Goodrich, Akron, OH
Babcock & Wilcox, Barberton, OH
Babcock & Wilcox, Canton, OH
Beaver Powerhouse, Beaver, PA
Beck Jord Power Plant, Cincinnati, OH
Bedford Yard, Bedford, OH
Bellville Mining Co., Wheelersburg, OH
Bethlehem Steel Co., Johnstown, PA
Black Clawson Co., Hamilton, OH
Black Clawson Co., Middletown, OH
Blaw-Knox Co., Martins Ferry, OH
Blaw-Knox Corp., Wheeling, WV
Boeing North America Inc., Columbus, OH
Bolling Oven & Machine, Cleveland, OH
Borden's Chemical, Cincinnati, OH
Borg-Warner, Louisville, OH
Branch Candy Co., Chicago, IL
Bremco Industries, Bremen, OH
Brookhaven National Labs, New York, NY
Brush Beryllium, Cleveland, OH
Buckeye Steel, Hannibal, OH
Buckeye Steel, Columbus, OH
Buffalo Yard, Buffalo, NY
Canton Provision Co., Canton, OH
Canton Iron & Metal Co., Canton, OH
Canton Drop Forge Corp., Canton, OH
Canton Yard, Canton, OH
Carborundum Grinding Wheel Co., Logan, OH
Cardinal PS/Brilliant PS/Tidd PS, Brilliant, OH
Carling Brewing Co., Cleveland, OH
C.C. Dunlap Lumber Co., Delaware, OH
Central Brass Foundry, Cleveland, OH
Central Foundry - General Motors, Defiance, OH
Central Motor, Dayton, OH
Centre Foundry, Wheeling, WV
Champion Paper, Hamilton, OH
Champion Paper Co., Hamilton, OH

Chase Brass, Cleveland, OH
Chelsea Machine Service, Dayton, OH
Chrysler Yard, Twinsburg, OH
Cincinnati Cordage & Paper Co., Cincinnati, OH
Cincinnati Gas & Electric Co., Cincinnati, OH
Circle Floor Co., New York, NY
Clark Oil & Refining Corp., Middletown, OH
Clark Oil, Canton, OH
Cleveland Cliffs Iron Co.
Cleveland Foundry, Cleveland, OH
Clevite Research, Cleveland, OH
Club Aluminum, Cleveland, OH
Coca-Cola Factory, Columbus, OH
Coffman Stair Co., Washington Courthouse, OH
Collins Mining Co., Hanging Rock, OH
Collinwood Yard, Collinwood, OH
Colonial Foundry, Louisville, OH
Columbus Yard, Columbus, OH
Combustion Engineering, Huntly Station, OH
Continental Can Co., Middletown, OH
Contours, Inc., Orrville, OH
Conway Yard, Freedom, PA
Cooper & Jackson, Dayton, OH
Cooper Weld Steel Co., Warren, OH
Cooper Tire, Findley, OH
Copperweld Steel, Newton Falls, OH
Copperweld Steel, Warren, OH
Crown Steel, Orville, OH
Crucible Steel Co., Midland, PA
Crystal Tissue Co., Middletown, OH
Curtiss Wright Corp., Columbus, OH
Custer City Chemical Co., Custer City, PA
Cuyahoga Foundry, Cleveland, OH
D&A Plumbing, Canton, OH
D&S Floors, Akron, OH
Dayton Walther, Portsmouth, OH
Dayton Rubber Co., Dayton, OH
Dayton Press, Dayton, OH
Dayton-Walther Corp., Dayton, OH
Delco Products, Dayton, OH
Detroit Diesel Allison, Detroit, MI
Diamond Ntl. Paper Mill, Middletown, OH
Diebold, Canton, OH

Diggle Machine & Tools, Muscle Shoals, AL
Dumas Steel, Pittsburgh, PA
Dunbar & Sullivan, Cleveland, OH
Dunlap Tire & Rubber, Massillon, OH
DuQuesne Steel, DuQuesne, PA
E. I. Dupont, Spalter, WV
Ebco Manufacturing Co., Columbus, OH
Engle Stone, Co., Pedro, OH
Erie Yard, Erie, PA
Exselo, Middletown, OH
Fernald Atomic Plant, Cincinnati, OH
Ferro Corp., Cleveland, OH
Firestone Tire & Rubber Co., Middletown, OH
Firestone Tire & Rubber Co., Akron, OH
Fisher Body, Cleveland, OH
Fisher Favio, Cleveland, OH
Fleet Aerospace (a/k/a Aeronca), Middletown, OH
Ford Motor Foundry, Brookpark, OH
Ford Motor Co., Canton, OH
Ford Motor Co., Hamilton, OH
Ford Motor Co., Brookpark, OH
Ford Motor Co., Cleveland, OH
Ford Motor Co., Sharonville, OH
Ford Motor Co., Batavia, OH
Ford Motor Co., Fairfax, OH
Ford Yard, Walton Hills, OH
Frigidaire Co., W. Carrollton, OH
Frigidaire Co., Dayton, OH
Frigidaire Co., Moraine City, OH
Ft. Hamilton-Hughes Hospital, Hamilton, OH
Gardner Board & Carton Co., Middletown, OH
Gateway Yard, Youngstown, OH
Gear Co. of America, Cleveland, OH
General Electric, Canonsburg
General Electric, Cincinnati, OH
General Electric, Cleveland, OH
General Electric, Evendale, OH
General Mills, Lancaster, OH
General Motors, Brookpark, OH
General Motors, Cleveland, OH
General Motors, Columbus, OH
General Motors, Dayton, OH
General Motors, Hamilton, OH

General Motors, Lordstown, OH
General Motors, Moraine, OH
General Motors, Norwood, OH
General Motors, Vandela, OH
Girard Yard, Girard, OH
Goodrich, Akron, OH
Goodyear Aerospace, Akron, OH
Goodyear Atomic, Dayton, OH
Goodyear Tire & Rubber Co., Middletown, OH
Granite City Steel, Granite City, IL
Greater Cleveland Regional Transit Authority, Cleveland, OH
Greer Steel, Dover, OH
Gregory Galvanizing Co., Canton, OH
Gulf Refinery, Philadelphia, PA
Hamilton Foundry, Hamilton, OH
Hamlin Metal, Akron, OH
Hardesty Chemical Co., Dover, OH
Harding Jones Paper Co., Middletown, OH
Harrison PS, Shinnston, WV
Hercules Motor Corp., Canton, OH
Hercules Power Co., Dublin, VA
Hermann Manufacturing Corp., Lancaster, OH
Hilshire Clark Electric, Canton, OH
Hoover Vacuum, Canton, OH
Hoskins Brothers Drywall, Cincinnati, OH
Howard Paper Mills (a/k/a Champion Int. & St. Regis), Franklin, OH
ICS Construction Co., Monroe, MI
Ideal Foundry, Newton Falls, OH
Ideal Foundry, Newton Falls, OH
Illinois Light & Power, Venice, IL
Industrial Firebrick Co., Cleveland, OH
Ingersole Rand Plant, Athens, PA
Inland Container Corp., Middletown, OH
International Paper, Florence, KY
Isley a.k.a. Superior Diary, Canton, OH
J & L Specialty Steel, Canton, OH
Jefferson Smurfit, Hamilton, OH
Jefferson Smurfit, Middletown, OH
Jones & Laughlin Steel, Louisville, OH
Jones & Laughlin Steel, Cleveland, OH
Jones & Laughlin Steel, Youngstown, OH
Jones & Laughlin Steel, Pittsburgh, PA
Jones & Laughlin Steel, Aliquippa, PA

Kaiser Aluminum, Ravenswood, WV
Kauffman Plumbing & Heating
Ken Lea Craft, Cambridge, VA
Kent State University, Kent, OH
Kent State University, Canton, OH
Kimberly Clark Corp., Miamisburg, OH
King Powder Co., King Mills, OH
Kinsman Street Yard, Cleveland, OH
Lancaster Glass Corp., Lancaster, OH
Lavino Chemical Co., Philadelphia, PA
Levinson Steel Co., Pittsburgh, PA
Leyman Corp., Cincinnati, OH
Liberty Paper Board Co., Steubenville, OH
Loblaw Warehouse, Youngstown, OH
Lorillard, Inc., Lima, OH
LTV Steel, Cleveland, OH
LTV Steel Briar Hill Works, Youngstown, OH
LTV Steel, Campbell Road, Cleveland, OH
LTV Steel, Massillon, OH
LTV Steel, East 45th Street, Cleveland, OH
LTV Steel, Warren, OH
LTV Steel, West third Street, Cleveland, OH
LTV Steel (f/k/a Republic Steel), Niles, OH
LTV Steel Campbell Works, Youngstown, OH
LTV, Newton Falls, OH
LTV Steel, Jennings Road, Cleveland, OH
LTV Steel, Youngstown, OH
Lucans Steel, Massillon, OH
Magnode Corp., Trenton, OH
Malibu Steel, Sharon, PA
Mansfield Sanitary Inc., Perrysville, OH
Mansfield Yard, Mansfield, OH
Marathon Station, Sharonville, OH
Martin Pilot, Massillon, OH
Martin Marietta, Woodville, OH
Massillon Rubber Co., Massillon, OH
Massillon Steel Casting Co., Massillon, OH
Maxwell Paper Co., Franklin, OH
McComber Steel, Canton, OH
Meade Paper, Chillicothe, OH
Merritt, Chapman & Scott, Cleveland, OH
Miami Carey, Middletown, OH
Mid America Spec. Dist., Youngstown, OH

Midland Steel, Cleveland, OH
Mingo Junction Yard, Mingo Junction, OH
Mohawk Foundry, Cleveland, OH
Mohawk Foundry, Garfield, OH
Mold Rite Plastics, Inc., Cambridge, OH
Monark Tire & Rubber Co., Hartville, OH
Monoglass Fibers, Breeman, OH
Monsanto, Dayton, OH
Monsanto, Miamisburg, OH
Monsanto, Cincinnati, OH
Mound Chemical Plant, Miamisburg, OH
MRI, Akron, OH
Murray Oil Manufacturing Co., Cleveland, OH
Muscle Shoals Industries, Florence, AL
National Iron & Metal Co., Canton, OH
National Rubber Machinery Co., Akron, OH
National Screen & Manufacturing, Cleveland, OH
National Screen & Manufacturing, Mentor, OH
National Steel, Wierton, WV
National Cash Register, Dayton, OH
Nickel Plate Railroad, Lima, OH
Niles Junction Yard, Niles, OH
Norfolk & Western Railroad, Massillon, OH
Norfolk & Western Railroad, Zanesville, OH
Norfolk & Western Railroad, Canton, OH
Northstar Steel, Youngstown, OH
Oglebay Norton Coal Mines, Mullins, WV
Ohio Brass Co., Barberton, OH
Ohio Box Board Co., Rittman, OH
Ohio Edison, Akron, OH
Ohio Edison, Youngstown, OH
Ohio Foundry, Cleveland, OH
Ohio Foundry & Manufacturing Co., Steubenville, OH
Ormet Corp., Potman, OH
Owens Corning, Toledo, OH
Owens-Illinois (a/k/a Tech Glass, a/k/a OI Neg.), Columbus, OH
Pascola Coal Mine, Salem, OH
Pepsi Cola Bottling Co., Portsmouth, OH
Pepsi Cola Bottling Co., Hamilton, OH
Perkins Diesel, Canton, OH
Permanent Mold and Die, Florence, AL
Philip Carey Corp., Monroe, OH
Philip Carey Corp., Middletown, OH

Philip Carey, Cincinnati, OH
Picker International, Inc., New York, NY
Pillsbury Co., Hamilton, OH
Pittsburgh and Lake Erie Railroad Company, Newell, PA
Pittsburgh Foundry Corp., Pittsburgh, PA
Pollock Paper Co., Middletown, OH
Poly Clinic Hospital and Medical School, New York, NY
Power Press Steel, Hubbard, OH
PPG Industries, Middletown, OH
PPG Industries, Barberton, OH
Precision Rubber Products, Dayton, OH
Precision Castings Co., Cleveland, OH
Premier Industries, Cleveland, OH
Princess Susan Coal Co., WV
Pure Oil Refinery, Lima, OH
Quality Castings Co., Orville, OH
Queen City Steel, Cincinnati, OH
Ralston Purina, Cincinnati, OH
Rayon Co., Cleveland, OH
Reeves Steel & Manufacturing Co., Dover, OH
Reynolds Metals Co., Richmond, VA
Reo Industries, Massillon, OH
Republic Rubber, Youngstown, OH
Republic Steel, Massillon, OH
Republic Steel, Niles, OH
Republic Steel, Plant B, Canton, OH
Republic Steel, Newton Falls, OH
Republic Steel, Berger Plant, Canton, OH
Republic Steel, South Division, Massillon, OH
Republic Steel, Union Drawn Steel, Massillon, OH
Republic Steel, Cleveland, OH
Republic Steel, Plant A, Canton, OH
Republic Steel, 3 Shop, Canton, OH
Republic Steel, Warren, OH
Republic Steel, 4 Shop, Canton, OH
Republic Engineered Steel Inc. (RESI), Canton, OH
Republic Steel, Canton, OH
Republic Steel, Eighth Street Plant, Canton, OH
Republic Steel, Youngstown, OH
Republic Steel, Stark Division, Canton, OH
Republic Steel, Culvert Division, Canton, OH
Residential Homes (home repairman), Canton, OH
Residential Homes (home repairman), Cleveland, OH

Residential Homes (home repairman), Flatwoods, WV
Residential Homes (home repairman), Medina, OH
Reyerson Steel Co., Cincinnati, OH
Rockport Yard, Cleveland, OH
Schaefer Valve Co., Orville, OH
Sharon Steel, Louisville, OH
Sharon Steel, Sharon, PA
Shell Oil Co., Hamilton, OH
Shell Oil Co., Middletown, OH
Shell Station, Sharonville, OH
SIA a/k/a Sancap, Alliance, OH
Sieple Lithograph Co., Canton, OH
Simcraft Tool & Gage, Dayton, OH
Sintermet, Brookpark, OH
S.K. Wellman, Bedford, OH
S.K. Wellman, Brookpark, OH
Sohio Refinery, Cleveland, OH
Sorg Paper, Middletown, OH
South Central Die Co., Florence, AL
Southwestern Ohio Steel Co., Hamilton, OH
Sperry Rand Corp., Huntsville, AL
St. Joseph Lead Co., Monaca, PA
Standard Oil Company, Cleveland, OH
Standard Plumbing & Heating
Standard Oil Company, Middletown, OH
Standard Oil Company, Canton, OH
Stark Ceramics, East Canton, OH
State Metals & Steel Co., Canton, OH
Stone Container Corp. (a/k/a Boxboard Corp.), Franklin, OH
Strong Enamel, Sebring, OH
Sun Oil Refinery, Toledo, OH
Sun Oil Co., Markes Hook, PA
Sun Rubber, Barberton, OH
Superior Foundry Co., Cleveland, OH
Superior Sheet & Steel, Louisville, OH
Surface Combustion Co., Mingo Junction, OH
Tallo Plant, New Orleans, LA
Taylor Steel Inc., Niles, OH
Tennessee Eastman Corp. Oak Ridge, TN
Texaco Refinery, Toledo, OH
The Timken Company, aka Timken Roller Bearing, Navarre Road SW, Canton, OH
The Timken Company, aka Timken Roller Bearing, Dueber Avenue, Canton, OH
The Timken Company, aka Timken Roller Bearing, Canton, OH

Thompson Ramo Woolridge (TRW), Cleveland, OH
Timken Steel, Harrison Plant, Canton, OH
Timken Steel, Faircrest Plant, Canton, OH
Timken Bearing Division, Gambrinus Plant, Canton, OH
Timken Steel, Wooster, OH
Timken Steel, Gambrinus Plant, Canton, OH
Timken Bearing, Wooster, OH
Tyson Bearing Co., Massillon, OH
USA Quick Print #2, Canton, OH
USA Quick Print #3, Canton, OH
USA Quick Print #5, Canton, OH
U.S. Steel, Lorain, OH
U.S. Steel, Clairton, PA
U.S. Steel, Cleveland, OH
U.S. Steel, Johnstown, PA
U.S. Steel, McDonald, OH
U.S. Steel, Ronco, PA
U.S. Steel, Allenport, PA
U.S. Steel (a/k/a Carnegie Illinois Steel Corporation), Mingo Junction, OH
U.S. Steel, McKeesport, PA
U.S. Steel, Ohio Works, Youngstown, OH
U.S. Steel, Homestead, PA
U.S. Steel, McDonald Works, Youngstown, OH
U.S. Steel, Clairton, PA
U.S. Rubber, Clinton, OH
U.S. Steel, Canton, OH
U.S.S. Higbee
U.S.S. Queen Mary
U.S.S. Sipan
Unimet Corp., Canton, OH
Union Carbide Corp., Marietta, OH
Union Metal, Canton, OH
Union Carbide Corp., Ashtabula, OH
Union Carbide Corp., Long Branch, WV
United Welding Co., Middletown, OH
Val Decker Packing Co., Piqua, OH
Valley Paper Converting Co., Toronto, OH
Valley Mold, Hubbard, OH
Valley Mold & Iron, Hubbard, OH
Vinton Dale Cole Mine, PA
Vioneering Co., Chicago, IL
Vioneering Co., Cleveland, OH
Wade Youmans Alliance, OH

Wallace Forge Tool & Dye, Canton, OH
Warner & Swaser, Cleveland, OH
Warner Iron Comp Foundry, TN
Washington Steel, Massillon, OH
WCI Steel, Warren, OH
Weber Dental Manufacturing, Canton, OH
Weirton Steel, Weirton, WV
West Virginia Steel & Mfg. Co., Huntington, WV
Westinghouse Electric Co., Cleveland, OH
Westinghouse Electric Co., Columbus, OH
Wheeling-Pitt Steel, Beechbottom, WV
Wheeling-Pitt Steel, Martins Ferry, OH
Wheeling-Pitt Steel, Monessen, PA
Wheeling-Pitt Steel, Allenport, PA
Wheeling-Pitt Steel, North Plant (Steubenville)
Wheeling-Pitt Steel, Benwood, WV
Wheeling-Pitt Steel, Yorkville, OH
Wheeling-Pitt Steel, South Plant (Mingo Junction)
Wheeling-Pitt Steel, East Plant (Follansbee, WV)
Wheeling-Pitt Steel, Warwood, WV
Wheeling-Pitt Steel, Wheeling, WV
Whiskey Island Yard, Cleveland, OH
Wilkoff Steel & Supply Co., Canton, OH
Wooster Yard, Wooster, OH
Worthington Steel, Monroe, OH
Wrenn Paper Co., Middletown, OH
Wright Aeronautical, Corp., Evandale, OH
Xerox Corp., Columbus, OH
Yoder Brothers, Inc., Barberton, OH
Youngstown Sheet & Tube/Lykes Steamship, Campbell, OH
Youngstown Sheet & Tube, Youngstown, OH
Youngstown Waste Water Treatment Plant, Youngstown, OH

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&
HOSTETLER LLP
COUNSELLORS AT LAW

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WRITER'S DIRECT DIAL NUMBER (216)

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WRITER'S DIRECT DIAL NUMBER (216) 861-7830
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August 30, 2002

VIA REGULAR U.S. MAIL

Ladd R. Gibke, Esq.
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

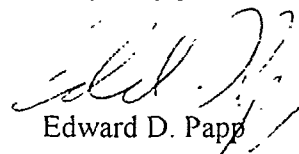
Re: In re: All Baron & Budd Cases in Which Maremont Corporation is
Named as Defendant v. A-Best Products Company, et al
Asbestos Master Case No. 073958

Dear Mr. Gibke:

Enclosed please find Maremont Corporation's Responses to Plaintiffs' Master Set of Interrogatories and Plaintiffs' Requests for Production of Documents Propounded to Maremont Corporation in the above referenced case.

If you have any questions, please do not hesitate to give me a call. I will send you an executed verification as soon as I receive it.

Very truly yours,


Edward D. Papp

Enclosures