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PIELEC

SUPERIOR COURT OF CALIFORNIA - COUNTY OF SAN FRANCISCO

In Re:

No. 828684



COMPLEX ASBESTOS LITIGATION

THE ROCKBESTOS COMPANY'S
SUPPLEMENTAL RESPONSES TO
GENERAL ORDER NO. 29
INTERROGATORIES

The Rockbestos Company (hereafter "Rockbestos"), hereby provides supplemental responses in writing under oath to plaintiffs' standard interrogatories pursuant to General Order No. 29.

The supplemental responses are made without a waiver of any objection on any ground previously stated in Rockbestos' Responses to General Order No. 29 interrogatories, dated March 15, 1991, and the preliminary statement and general objections contained in the March 15, 1991 responses are specifically made a part of and incorporated by reference into each of the supplemental responses set forth below. Furthermore, Rockbestos reserves

///

1 the right to assert further objections at trial, whether or not
2 asserted herein, to the interrogatories and responses.

3
4 RESPONSE TO INTERROGATORY NO. 10(b)-(c):

5
6 Some of the following wire and cable products contained
7 encapsulated and saturated asbestos during the indicated periods.

8	9 <u>Wire/Cable Products</u>	10 <u>Approx. Dates of Manufacture</u>
11	Apparatus wire	1936 to 1985
12	Motor lead wire	1930 to 1985
13	Appliance and fixture wire	1930 to 1985
14	Control cable	1930 to 1985
15	Power cable	1930 to 1985
16	Switchboard wire	1930 to 1985
17	High temperature wire	1938 to 1985
18	Furnace and mud gun cable	1974 to 1980
19	Shipboard cable	1930 to 1979
20	Instrumentation cable	1930 to 1977

21
22 RESPONSE TO INTERROGATORY NO. 10(d):

23
24 It is unduly burdensome for Rockbestos to provide the
25 chemical composition of each such product because Rockbestos
26 manufactured many different wire and cable products during the

1 fifty-five year period, and the chemical composition varied broadly
2 over time and with the type and size of the wire and cable.

3

4 The following are examples:

5

6 Year: 1981

7

8 Product

9 #14 Firezone 101
10 (High Temperature TAGT)

11 Components

	%
12 Nickel clad conductor	47.4
13 Teflon tape	9.3
14 Teflon coated glass yarn	13.0
15 Teflon finish compound	1.6
16 Glass yarn	4.9
17 Silicone and resin finish compounds	9.7
18 Lap: Asbestos	12.1
19 Other non-asbestos components	2.0

20 / / /

21 / / /

22 / / /

23 / / /

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26 / / /

1	Year: 1979	
2	<u>Product:</u>	
3	#14 AVA	
4		
5	<u>Components:</u>	%
6	Copper conductor	29.0
7	Tape	.5
8	Mylar	.7
9	Saturant	29.5
10	Varnished cambric tape	12.8
11	Lap and yarn: asbestos	23.6
12	other non-asbestos components	4.1
13	Year: 1981	
14	<u>Product:</u>	
15	#8 AVA	
16	<u>Components</u>	%
17		
18	Copper Conductor	55.5
19	Nomex tape	.4
20	Mylar	.5
21	Varnished cambric tape	9.2
22	Saturant	18.4
23	Lap and yarn: Asbestos	13.4
24	Other non-asbestos components	2.4
25	/ / /	
26	/ / /	

1 Rockbestos used only chrysotile asbestos in manufacturing
2 wire and cable products with insulation containing encapsulated and
3 saturated asbestos.

4
5 RESPONSE TO INTERROGATORY NO. 10(i):
6

7 Pre-1980 sales records and data for the defined
8 geographic area are no longer in existence with the exception of
9 some records reflecting sales of wire and cable products, some of
10 which contained encapsulated and saturated asbestos, to California
11 Nuclear Plants.

12
13 RESPONSE TO INTERROGATORY NO. 15:
14

15 Between 1979 and 1986 a warning was included on all
16 boxes, spools or reels of cable and wire products containing
17 insulation with encapsulated and saturated asbestos.

18
19 RESPONSE TO INTERROGATORY NO. 17:
20

21 The wire and cable products generally did not have any
22 external markings, although the boxes, spools or reels containing
23 the product generally were marked or tagged with the names Cerro or
24 Rockbestos, or the brand or trade names previously identified. In
25 general, wire and cable products were marked internally with marker
26 threads.

1 RESPONSE TO INTERROGATORY NO. 20:

2
3 Numerous uncatalogued documents responsive to this
4 request are maintained at The Rockbestos Company, 285 Nicoll
5 Street, New Haven, Connecticut 06504, and arrangements may be made
6 to inspect these documents at that location.

7
8 Dated: April 29, 1991

9
10 BJORK, FLEER, LAWRENCE & HARRIS

11
12 By Dorine R. Kohn
13 Dorine R. Kohn
14 Attorneys for Defendant
15 The Rockbestos Company
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VERIFICATION

I, George G. Littlehales, am the Quality Assurance Manager for The Rockbestos Company, a party in the above-entitled action, and as such am authorized to make the following verification. I have read the foregoing THE ROCKESTOS COMPANY'S SUPPLEMENTAL RESPONSES TO GENERAL ORDER NO. 29 INTERROGATORIES and know the contents thereof. No single official, employee or former employee of The Rockbestos Company has personal knowledge of all such matters. The information contained herein has been compiled at my direction by counsel for The Rockbestos Company. I am informed and believe all the responses are true and verify the responses on that basis.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed this 26th day of April, 1991 at New Haven, Connecticut.


George G. Littlehales