

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing pleading has been forwarded to all counsel of record on this the 19 day of January, 1990.



STEVEN P. AMIS

KAREN ELAINE KNAPP, Executrix)
and Personal Representative of) IN THE DISTRICT COURT
the Heirs and Estate of GEORGE)
R. HALL, SR., Deceased, BESSIE)
M. WILLIAMS, Individually and)
as Personal Representative of)
the Heirs and Estate of ALTON)
WILLIAMS, Deceased, MARY E. MAY,)
Individually and as Personal)
Representative of the Heirs and) DALLAS COUNTY, TEXAS
Estate of WILLIE J. MAY, ROBERT)
E. MALONE, SR. and IRMA MALONE)
RAYMOND R. ORR as)

Pl

v.

ARMSTRONG WORLD I
INC., et al.

De

OWENS
ANSWERS TO F

On December
six Interrogatori

Corporation (OCF). Subject to the following statement, OCF
responds to plaintiffs' Interrogatories as follows.

INTRODUCTORY STATEMENT

OCF makes the following answers without in any way waiving:
(1) the right to object on the grounds of competency, relevancy
and materiality, hearsay (except as expressly admitted herein) or
any other proper ground to the use of any such information, for
any purpose, in whole or in part, in any subsequent stage or
proceeding in this action or any other action; and (2) the right
to object on any and all grounds, at any time, to any other

discovery procedure involving or relating to the subject matter of these requests.

OCF objects to these interrogatories to the extent that they describe information which is protected from discovery as attorney work product, attorney-client communication, protected by the right to privacy, or as material which is considered to be proprietary and trade secret.

All of the answers set forth below are made subject to the above comments and qualifications.

OCF'S ANSWERS

The following documents are identified by the Exhibit Number, Description, and Bates Number used by the plaintiffs in their Interrogatories.

In INTERROGATORY NO. 1, plaintiffs request that, for each document, OCF answer whether such document is a true and correct duplicate of a genuine and authentic document.

In INTERROGATORY NO. 2, plaintiffs request that OCF answer whether each document was kept and/or generated in the regular course of a regularly conducted business activity of OCF.

In answering Interrogatory No. 2, OCF has defined "kept . . . in the regular course" as kept at any time in the regular course of business at OCF.

OCF responds to plaintiffs' Interrogatories Nos. 1 and 2 as follows:

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(a) K-168(a)	"Special Hazards Survey, Dust Survey," prepared for	42 007 0001-0007

Owens-Illinois Kaylo Division,
Berlin, NJ, dated April 23,
1958 and May 2, 1958

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for

claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(b) K-179	Memo, F.H. Edwards to C. G. Staelin, August 12, 1964 (Owens-Corning document)	01 029 0398

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(c) K-184	Memorandum from W. C. Taylor to R. L. Logan, Jr. re: Kaylo Insulation Composition, dated January 8, 1965	01 008 1371

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(d) K-187	Memorandum from Wayne Johnson to C. G. Staelin re: Health Hazards, dated October 27, 1966	01 036 0813-0814

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 4:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(e) K-194	Memorandum from R. F. Shannon to W. C. Taylor with article titled "Asbestos of the Lungs," March 4, 1967	01 009 0302-0303

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document is, in part, unreadable. Notwithstanding this objection, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(f) K-206	Memorandum from Jon L. Konzen to Tom Dailey re: Health Aspects of Fibrous Glass, dated April 28, 1969	01 117 0084

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on

November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in

these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(f) K-277	Owens-Corning Fiberglas Corp. Intra-Company Correspondence to C. G. Staelin from T. S. Rogers. Subject: Mr. Marshall's memorandum on Itch Propaganda, dated January 30, 1940 (Two pages)	01 500 0037-0038

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and

other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(g) K-278	Draft of Health Hazards of Fiberglas dated May 15, 1941	01 501 1097-1107

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document is incomplete. Based on the foregoing, OCF denies this Interrogatory.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document is incomplete. Based on the foregoing, OCF denies this Interrogatory.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(h) K-279	Draft of Introduction for Mailing Piece on Health Aspects of Fiberglas, dated June 12, 1941	01 501 0849

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(i) K-280	Letter from Jerome J. Gelman to Union Asbestos & Rubber Co., dated December 7, 1954, re: 15 workers who have contracted pneumoconiosis	01 076 0677

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for

claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its

business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(j) K-281	Pages 2 and 3 of a letter to Jerome Gelman, Esq., re: Matthew Gross; with attachment: two page medical report on Matthew Gross; studied December 17, 1954	01 076 1096-1099

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(k) K-282	Two page letter to Jerome Gelman from Irving J. Selikoff, M.D. re: John W. Peterson with attachment: three page medical report on John W. Peterson, studied January 5, 1955	01 076 0947-0951

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production

records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(1) K-283	Two page letter to Jerome Gelman, Esq. from Irving J. Selikoff, M.D., dated March 11, 1955, with attachment: 3 page medical report on Joseph Pignatelli	01 076 0992-0996

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(m) K-284	Two page letter to Jerome Gelman from Irving J. Selikoff, M.D., dated April 13, 1955, with attachment: 3 page medical report on Martin Ragauskas	01 076 1111-1115

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(n) K-285	Notice that Nicholas Cotsakos has contracted a compensable occupational disease to claim agents for Union Asbestos & Co. from Dominic Cavaliore, dated April 14, 1955	01 076 0664

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this

document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(o) K-286	Three page letter to Jerome Gelman, Esq. from Irving J. Selikoff, M.D., dated May 23, 1955, with attachment: 2 page medical report on Wallace Sisco	01 076 0983-0987

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(p) K-287	Three page letter to Jerome Gelman from Irving J. Selikoff, M.D., dated October 27, 1955, with attachment: 4 page medical report on Anthony Francello	01 076 0952-0958

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production

records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(q) K-288	Three page letter to Jerome Gelman from Irving J. Selikoff, M.D., dated October 27, 1955, with attachment: 3 page medical report on Henry Stuart	01 076 0961-0966

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(r) K-289	Three page letter to Jerome Gelman from Irving J. Selikoff, M.D., dated December 9, 1955, with attachment: 3 page medical report on Jesus Perez	01 076 1088-1093

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(s) K-290	Four page report to	01 501 1573
	M.D. Burch from G.W.H.	01 501 1314
	Schepers, M.D., D.Sc.	01 501 1315
	re: current experimentation	01 501 1577
	on Fiberglas, dated	
	February 6, 1956	

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document. INTERROGATORY NO 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
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(t) K-291(a) Owens-Corning Fiberglas 01 501 1312
Corp. Intra-Company
correspondence to Dr.
Charles Bishop - Newark
(Medical Dept.) from
John D. Black - Toledo,
dated February 8, 1956

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P.

Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(u) K291(b)	Owens-Corning Fiberglas Corp. correspondence to M.D. Burch - Toledo from John D. Black - Toledo	01 501 1316.05

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these

proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(v) K-291(c)	Attachment to both: 4 page report to M.D. Burch from G. W. H. Schepers, M.D., D.Sc., dated February 6, 1956	01 501 1313-1316

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

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Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(w) K-292	Owens-Corning Fiberglas Corp. Intra-Company correspondence to John D. Black - Toledo from W. F. Aikman - Toledo, dated February 9, 1956, re: Dr. Schepers' letter of February 6, 1956	01 501 1572.03

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

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Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(x) K-293	Two page medical report on Mr. Claude J. Tomplait, 201 Kay, Bridge City, Texas by T. R. Jones, M.D.	02 209 0251-0252

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in

camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(y) K-294	Owens-Corning Fiberglas Corp. Intra-Company correspondence to R.E. Estep - Charleston from R.L. Logan, Jr. - Toledo, dated January 11, 1965	01 008 1370

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(z) K-295	Owens-Corning Fiberglas	01 008 1333

Corp. Intra-Company
correspondence to O. W.
Pfeifer - Granville, Dr.
W. C. Taylor - Toledo,
Mr. M. D. Burch - Toledo,
and Mr. R. L. Logan, Jr. -
Toledo from F. H. Edwards -
Toledo, dated January 22, 1965
re: inquiries about Kaylo

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on

November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(aa) K-296	Letter to Mr. C.F. Schroeder - Toledo from R. F. Shannon, dated January 4, 1966, re: Case 8981	01 036 2026

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its

claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(bb) K-297	Owens-Corning Fiberglas Corp. correspondence to all officers, regional and branch managers, sales and contracting divisions and their branch personnel, and plant managers from John Marshall Briley, Vice President dated July 13, 1966	01 039 1480

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document. INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(cc) K-298	Owens-Corning Fiberglas Corp. Intra-Company correspondence to John Vyverberg - New York from A. S. Kevlin - New York re: Kaylo Dust - Bath Iron, dated July 28, 1966	01 039 1479

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2.:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(dd) K-299	Owens-Corning Fiberglas Corp. Intra-Company correspondence to J. M. Briley - Toledo from F. H. Edwards - Toledo re: Kaylo Dust - Bath Iron Works, dated August 8, 1966 (2 pages)	01 039 1475-1476

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(ee) K-300	Owens-Corning Fiberglas Corp. Intra-Company correspondence to A.S. Kevlin - New York from F. H. Edwards - Toledo re: Bath Iron Works, dated August 9, 1966	01 039 1474

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(ff) K-301	Owens-Corning Fiberglas Corp. Intra-Company correspondence to J. M. Briley - Toledo from Wayne Johnson - New York re: Health Hazards-Kaylo, dated October 5, 1966	01 039 1472

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(gg) K-302	Letter to J. M. Briley - Toledo from F.H. Edwards - Toledo re: Health Hazards-Kaylo, dated October 24, 1966	01 039 1471

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(hh) K-303	Letter to J. M. Briley - Toledo from Wayne Johnson - New York re: Warning Label on Kaylo, dated Nov. 8, 1966	01 039 1467

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(ii) K-304	Memo to J. F. Vyverberg -	01 039 1465

New York, J.H. Briley -
Toledo, F.M. Edwards -
Toledo, W. Johnson - New
York from F.R. Winnert -
New York re: Health
Hazards-Kaylo, dated
November 10, 1966

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(jj) K-305	Memo to J.M. Briley - Toledo, F.H. Edwards - Toledo, D.W. Ladd, Jr. - New York, J.F. Vyverberg - New York from Wayne Johnson - New York re: Warning Label on Kaylow [sic], dated December 5, 1966	01 039 1463

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document. INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(kk) K-306	Three page letter to State of Washington, Dept. of Labor and Industries, Olympia, Wash. from Lee F. Chorkley, D.O. re: Cecil B. Lockwood, dated January 20, 1967	02 209 0476-0478

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(ll) K-307	Memo to Robert L. Logan - Toledo from Jon L. Konzen, M.D., dated February 9, 1968. (2 pages)	02 209 0222-0223

ANSWER:

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County,

Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(mm) K-308	Memo to John Vyverberg from Jon L. Kozen, M.D. dated April 3, 1969 (4 pages)	02 401 0476-0478

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(nn) K-309	Confidential memo to C.G. Staelin from Jon L. Konzen, M.D. dated June 5, 1979	01 036 1114

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its

claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(oo) K-310	Owens-Corning Fiberglas	01 029 0591-0597

Corp. Intra-Company
correspondence to Keith
Preston - Bloomington from
Jon L. Konzen, M.D., dated
April 16, 1971, re: Bloomington
Trip report, April 7 and 8, 1971
(7 pages)

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(pp) K-311	Memo to S.M. Mayer - T/26 from Jon L. Konzen, M.D., dated Sept. 20, 1972 with attachment: memo to Steve Mayer - T/26 from Jon L. Konzen, M.D., dated Aug. 29, 1972 (4 pages)	08 006 1041-1044

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its

claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(qq) K-312	Owens-Corning Fiberglas	01 086 1565

Corp. Intra-Company
correspondence to R. F.
Shannon - Granville from
C.B. Warden - Granville,
dated Sept. 5, 1972

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County,

Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(rr) K-313	Owens-Corning Fiberglas Corp. Intra-Company correspondence to Mr. C.B. Warden - Granville from R.F. Shannon- Granville 62 re: Asbestos, dated Sept. 13, 1972	01 086 1564

ANSWERS

INTERROGATORY NO. 1:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. Anchor Packing Co., et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders

entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF objects to this Interrogatory on the ground that this document was produced by OCF pursuant to an Order entered on November 3, 1989 by Judges Riley and Magg in Jamison v. A.P. Green, et al., pending in the Circuit Court for Madison County, Illinois, after an in camera review of this document for claims of privilege that had been asserted by OCF. OCF maintains that this document is privileged from discovery and that its claim of privilege has not been waived by compliance with orders entered by Judges Riley and Magg. The ruling of those judges upon in camera inspection of this document is not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

Without waiving this and other objections, OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

EXHIBIT NO.
(ss) K-314

DESCRIPTION
Two page letter to Edward

BATES NUMBER
01 501 1611-1612

Ames from Leroy U. Garner
dated March 13, 1943

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(tt) K-315	Letter to Edward C. Ames from Albert Baumgardner's physician dated Nov. 21, 1944, re: Baumgardner's asbestosis	01 505 0004

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this

document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(uu) K-316	Undated letter to Edward Ames re: cause of Albert Baumgardner's condition	01 505 0006

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(vv) K-317	Letter to Dr. A.E. Canfield from Public Relations Manager dated November 22, 1944 re: Albert Baumgardner	01 505 0002

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(ww) K-318	Letter to Medical Department State Office Bldg., Columbus, Ohio, from Don Hanna, Safety Director, Division of Safety and Hygiene for the State of Ohio, dated Jan. 21, 1946	01 505 1705

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(xx) K-319	Two page Owens-Corning Fiberglas Intra-Company correspondence to J.H. Boynton from William A. Lotz dated June 20, 1963. Subject: Methods for Evaluating Kaylo Dust.	01 081 1884-1885

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(YY) K-320	Three page Owens-Corning Fiberglas Intra-Company correspondence to R.L. Stafford from Michael Hardwick dated May 24, 1965. Subject: Kaylo-Long Range Planning - Personnel	01 041 0916-0918

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(zz) K-321	Owens-Corning Fiberglas Process Specification, Quality Control and Specification Dept., No. AH.518.P.OT.10 dated	42 013 1831

March 7, 1977

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was generated and kept in its files in the course of the regularly conducted business of OCF.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>BATES NUMBER</u>
(aaa) K-322	Owens-Corning Fiberglas Equipment Insulations Brochure, IN6.A3, June, 1956. (8 pages)	42 012 0722-0729

ANSWERS

INTERROGATORY NO. 1:

OCF admits that this document is a true and correct duplicate of a document found in OCF's files, except insofar as this document contains marginalia, exhibit stickers, production records, handwriting and other marks which do not appear on the original of this document.

INTERROGATORY NO. 2:

OCF admits that this document was kept in its files in the ordinary course of its business. OCF, however, denies that this document was generated in the course of a regularly conducted business activity of OCF.

INTERROGATORY NO. 3:

Please answer whether the document entitled "OCF Asbestos Litigation Privileged Documents -- Not Discoverable", attached here as Plaintiffs' Exhibit 1, is a true and correct duplicate of a genuine and authentic document.

ANSWERS

OCF objects to this Interrogatory on the ground that it is not calculated to lead to the discovery of admissible evidence. Because plaintiffs' Exhibit 1 was generated by OCF counsel, not by OCF, admission or denial of its authenticity provides no information that pertains to admissible evidence.

INTERROGATORY NO. 4:

Please answer whether the original copy of Plaintiffs' Exhibit 1 referenced above was kept and/or generated in the regular course of a regularly conducted business activity of OCF.

ANSWERS

OCF objects to this Interrogatory on the ground that it is not calculated to lead to the discovery of admissible evidence. Because plaintiffs' Exhibit 1 was generated by OCF counsel, not by OCF, admission or denial of its authenticity provides no information that pertains to admissible evidence.

INTERROGATORY NO. 5:

On November 8, 1989, did Judge Riley in the case styled Jamison v. Anchor Packing Company, et al., CA No. 87-L-1230 (3rd Jud. Cir. Madison County, Ill.) sign an Order commanding OCF to produce to plaintiffs in that case true and correct copies of approximately 378 documents which OCF claimed to be privileged?

ANSWERS

OCF objects to this Interrogatory on the grounds that it is irrelevant and not calculated to lead to the discovery of admissible evidence. OCF maintains that the ruling of Judges Riley and Magg in Jamison are not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

INTERROGATORY NO. 6:

If so, did OCF produce true and correct copies of these documents from their Document Depository in Richmond, Virginia to the Court?

ANSWERS

OCF objects to this Interrogatory on the grounds that it is irrelevant and not calculated to lead to the discovery of admissible evidence. OCF maintains that the ruling of Judges Riley and Magg in Jamison are not applicable in these proceedings because the ruling was made under the Illinois law of privilege.

INTERROGATORY NO. 6:

Has OCF stipulated or agreed to the authenticity of any of the documents referenced in Interrogatory No. 1 with any person prior to the date of these Interrogatories?

ANSWERS

OCF objects to this Interrogatory on the grounds that it is irrelevant and not calculated to lead to the discovery of admissible evidence. Any prior stipulation or agreement made under the circumstances of a specific case has no bearing on the actual authenticity of the referenced documents and as such is not calculated to lead to admissible evidence.

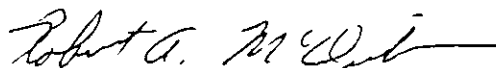
KAREN ELAINE KNAPP, Executrix)	IN THE DISTRICT COURT OF
and Personal Representative of)	
the Heirs and Estate of GEORGE R)	
HALL, SR., Deceased; BESSIE M.)	
WILLIAMS, Individually and as)	
Personal Representative of the)	
Heirs and Estate of ALTON)	
WILLIAMS, Deceased; MARY E. MAY)	
Individually and as Personal)	
Representative of the Heirs and)	
Estate of WILLIE J. MAY; ROBERT)	
E. MALONE, SR. and IRMA MALONE;)	DALLAS COUNTY, TEXAS
RAYMOND R. ORR and LYDIA ORR)	
)	
Plaintiffs)	
)	
Versus)	
)	
ARMSTRONG WORLD INDUSTRIES,)	
INC., ET AL.)	
)	
Defendants)	101TH JUDICIAL DISTRICT
)	
STATE OF OHIO)	
)	
COUNTY OF LUCAS)	

AFFIDAVIT

ROBERT A. McCOMBER, being duly sworn, deposes and says that he is Counsel - Litigation for OWENS-CORNING FIBERGLAS CORPORATION and that he verifies the foregoing answers to plaintiffs' Amended Responses to Initial Interrogatories for and on behalf of OWENS-CORNING FIBERGLAS CORPORATION and is duly authorized so to do; that the matters stated therein are not within the personal knowledge of deponent; that the facts stated therein have been assembled by authorized employees and counsel of OWENS-CORNING FIBERGLAS CORPORATION and deponent is informed that the facts stated therein are true.

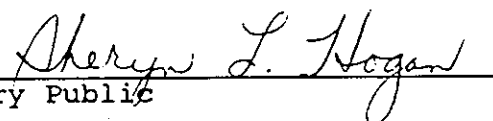
Page 2

KAREN ELAINE KNAPP, et al.



ROBERT A. MCOMBER

SWORN TO and subscribed
before me this 30th day
of March, 1990.


Notary Public

SHERYN L. HOGAN
Notary Public, State of Ohio
My Commission Expires Aug. 18, 1994