

ELLIOTT, J.

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

ROGER DALE BLAKE, ET AL : CASE NO. CV96 01 0191

Plaintiffs :

VS. :

A-BEST PRODUCTS COMPANY, ET AL :

Defendants :

DEFENDANT CROWN CORK & SEAL COMPANY'S
ANSWERS TO PLAINTIFFS' MASTER SET OF INTERROGATORIES
PROPOUNDED TO CROWN CORK AND SEAL COMPANY, INC.

Answer 1: Crown Cork & Seal Company, Inc., a New York corporation, has never manufactured, processed, sold or distributed asbestos products. In November of 1963, Crown Cork & Seal purchased some stock of Mundet Cork Corporation. Mundet Cork Corporation continued to exist and at that time had two divisions: a Cork Products Division and a Thermal Insulation Contract Division. This purchase by Crown Cork & Seal Company, Inc. was done for the purpose of acquiring Mundet Cork Corporation's Cork Products Division, which fit into Crown Cork & Seal's line of business. Crown Cork & Seal Company, Inc. had no interest in acquiring or in having anything to do with the Thermal Insulation Contract Division.

The Thermal Insulation Contract Division of Mundet Cork Corporation may have manufactured, processed, sold or distributed some asbestos products, but Crown Cork & Seal Company, Inc. is not even sure that this is the case since Crown Cork & Seal Company, Inc. had no interest in that division. The Cork Products Division did not manufacture, process, sell or distribute any asbestos products.

Immediately after the acquisition by Crown Cork & Seal Company, Inc. of some stock of Mundet Cork Corporation, the latter company halted the operation of the Thermal Insulation Contract Division and began looking for a purchaser of that division. Less than three months later, on February 8, 1964, Mundet Cork Corporation sold the entire Thermal Insulation Contract Division to

Baldwin-Ehret-Hill, Inc. Pursuant to that sale, Baldwin-Ehret-Hill, Inc. took over all of the equipment, inventory, contracts and all personal property, including all files and records of the Thermal Insulation Contract Division. As a consequence, Crown Cork & Seal Company, Inc. has no records or documents.

Almost one and a half years later, in December of 1965, Mundet Cork Corporation, which at the time had only one division, i.e., Cork Products Division, ceased to exist and the assets of that division were transferred to Crown Cork & Seal Company, Inc.

Answer 2: See answer to Interrogatory No. 1.

Answer 3: See answer to Interrogatory No. 1.

Answer 4: See answer to Interrogatory No. 1.

Answer 5: See answer to Interrogatory No. 1.

Answer 6: See answer to Interrogatory No. 1.

Answer 7: See answer to Interrogatory No. 1.

Answer 8: See answer to Interrogatory No. 1.

Answer 9: See answer to Interrogatory No. 1.

Answer 10 thru 10.4: See answer to Interrogatory No. 1.

Answer 11: See answer to Interrogatory No. 1.

Answer 12: See answer to Interrogatory No. 1.

Answer 13: See answer to Interrogatory No. 1.

Answer 14: See answer to Interrogatory No. 1.

Answer 15: See answer to Interrogatory No. 1.

Answer 16: See answer to Interrogatory No. 1.

Answer 17: See answer to Interrogatory No. 1.

Answer 18: See answer to Interrogatory No. 1.

Answer 19: See answer to Interrogatory No. 1.

Answer 20: See answer to Interrogatory No. 1.

Answer 21: See answer to Interrogatory No. 1.

Answer 22: See answer to Interrogatory No. 1.

Answer 23: See answer to Interrogatory No. 1.

Answer 24: See answer to Interrogatory No. 1.

Answer 25: See answer to Interrogatory No. 1.

Answer 26: See answer to Interrogatory No. 1.

Answer 27: See answer to Interrogatory No. 1.

Answer 28: See answer to Interrogatory No. 1.

Answer 29: See answer to Interrogatory No. 1.

Answer 30: See answer to Interrogatory No. 1.

Answer 31: See answer to Interrogatory No. 1.

Answer 32: See answer to Interrogatory No. 1.

Answer 33: See answer to Interrogatory No. 1.

Answer 34: See answer to Interrogatory No. 1.

Answer 35: See answer to Interrogatory No. 1.

Answer 36: See answer to Interrogatory No. 1.

Answer 37: See answer to Interrogatory No. 1.

Answer 38: See answer to Interrogatory No. 1.

Answer 39: See answer to Interrogatory No. 1.

Answer 40: See answer to Interrogatory No. 1.

Answer 41: See answer to Interrogatory No. 1.

Answer 42: See answer to Interrogatory No. 1.

Answer 43: See answer to Interrogatory No. 1.

Answer 44: See answer to Interrogatory No. 1.

Answer 45: See answer to Interrogatory No. 1.

Answer 46: See answer to Interrogatory No. 1.
Answer 47: See answer to Interrogatory No. 1.
Answer 48: See answer to Interrogatory No. 1.
Answer 49: See answer to Interrogatory No. 1.
Answer 50: See answer to Interrogatory No. 1.
Answer 51: See answer to Interrogatory No. 1.
Answer 52: See answer to Interrogatory No. 1.
Answer 53: See answer to Interrogatory No. 1.
Answer 54: See answer to Interrogatory No. 1.
Answer 55: See answer to Interrogatory No. 1.
Answer 56: See answer to Interrogatory No. 1.
Answer 57: See answer to Interrogatory No. 1.
Answer 58: See answer to Interrogatory No. 1.

CROWN CORK & SEAL COMPANY, INC.

BY: Richard L. Krzyzanowski
Richard L. Krzyzanowski
Its Vice President
9300 Ashton Road
Philadelphia, PA 19136

Dated: Feb 24, 1997.

STATE OF PENNSYLVANIA)
) ss:
COUNTY OF PHILADELPHIA)

Richard L. Krzyzanowski, being first duly sworn, deposes and says that he is Vice President of Crown Cork & Seal Company, Inc., that he has read the foregoing Answers of Crown Cork & Seal Company, Inc. to Plaintiffs' Master Set of Interrogatories Propounded to Crown Cork and Seal Company Inc. by him subscribed

and knows the contents thereof, and that the foregoing answers are true to the best of his knowledge and belief.

Richard L. Krzyzanowski
Richard L. Krzyzanowski

Subscribed and sworn to before me, a notary public, by Richard L. Krzyzanowski, this 24th day of February, 1997.

NOTARIAL SEAL
THERESA RAUSCH, Notary Public
City of Philadelphia, Phila. County
My Commission Expires May 9, 2000

Theresa Rausch
Notary Public, Philadelphia County,
Pennsylvania

My commission expires: May 9, 2000

PROOF OF SERVICE

I hereby certify that I have this date mailed a copy of the foregoing Answers of Crown Cork & Seal Company, Inc. to Plaintiffs' Master Set of Interrogatories Propounded to Crown Cork and Seal Company Inc. to Steven D. Wolens, Esq., Baron & Budd, The Centrum, Suite 1100, 3102 Oak Lawn Avenue, Dallas, Texas 75219 and Andrew S. Lipton, Esq., Manley, Burke, Lipton & Cook, 225 West Court Street, Cincinnati, Ohio 45202, Attorneys for Plaintiffs; and notice of filing of these Answers was given to all other defendants and/or their counsel by copy of the Distribution List attached.

Robert L. Davis
ROBERT L. DAVIS (SCT #0014831)
Counsel for Defendant, Crown
Cork and Seal Company, Inc.

dr:2/5/97

2-28-97
Date

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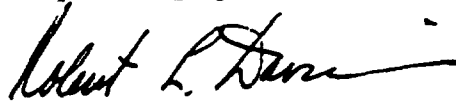
February 28, 1997

RE: Asbestos Litigation
Court of Common Pleas, Butler County, Ohio
Roger Dale Blake, et al v. AC&S, INC., et al
Case No. CV96 01 0191

TO DEFENDANTS and/or DEFENSE COUNSEL OF RECORD:

Please be advised that I am filing Defendant Crown Cork & Seal Company's Answers to Plaintiffs' Master Set of Interrogatories Propounded to Crown Cork and Seal Company, Inc., a defendant in the case listed above. No copy of said answers to interrogatories is enclosed; however, if you desire a copy, please advise.

Very truly yours,



ROBERT L. DAVIS

RLD:dr

cc: Steven D. Wolens, Esq.
Andrew S. Lipton, Esq.

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

DISTRIBUTION LIST

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