

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

4TH JUDICIAL DISTRICT

IN RE: Minnesota Personal
Injury (Railroad)
Asbestos Cases

Responses of Defendant Manville
Corporation Asbestos Disease
Compensation Fund Responses to
Plaintiffs' Interrogatories

TO: PLAINTIFFS AND THEIR RESPECTIVE COUNSEL:

Comes now Non-Railroad Defendant Manville Corporation Asbestos Disease Compensation Fund (hereafter "the Fund"), by and through its attorneys, OPPENHEIMER WOLFF & DONNELLY and hereby submits the following Responses to Plaintiffs' Set I Interrogatories:

Preliminary Matters

The Fund objects to these discovery requests to the extent that they ask for information relating to the Fund's involvement in the asbestos industry. The Fund has never been involved in the manufacture, sale or distribution of asbestos or asbestos containing products. Nevertheless, the Fund interprets these questions to relate to Manville Corporation, its predecessors or subsidiaries (hereafter "related entities").

The Fund objects to these discovery requests to the extent that they call for information or production of documents entitled to protection as privileged attorney client communications or attorney work product.

To the extent that the information contained herein differs in any respect from any prior response to discovery, these responses shall be deemed to supersede such prior responses in any and all cases. The Fund reserves the right to supplement these responses to the extent that additional or different information becomes available.

RESPONSES

1. During the period in question, did you sell or supply any asbestos-containing products to the railroad?

RESPONSE:

There is a computerized database for the Industrial Products Division of Manville Corporation or related entities which contains records of sales of both asbestos containing and asbestos free products for the years 1972 through 1985. A search has been conducted of this computerized database and sales of products, some of which may have contained asbestos, to Burlington Northern Railroad Company, for the year 1972 have been identified. These