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01/05/96

PLAINTIFF'S EXHIBIT

K-1994

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

NANCY KEILHACK, Individually and	)	
as Special Administrator of the	)	
Estate of Thomas Keilhack, deceased,	)	
Plaintiff,	)	
v.	)	No. 92 L 212
OWENS-CORNING FIBERGLAS CORPORATION,	)	
et al,	)	
Defendants.	)	

**DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

PRELIMINARY STATEMENT

Some of the events which may be relevant to the matters inquired about by Plaintiffs' Interrogatories apparently occurred more than thirty-five years ago. In addition, effective April 30, 1958, Owens-Illinois, Inc. disposed of the business involved in this action by way of sale of that business to Owens-Corning Fiberglas Corporation. Since that time, Owens-Illinois, Inc. has not engaged in the asbestos-containing insulation products manufacturing business. It does not now and it has not since that sale manufactured, distributed or sold any of its Kaylo asbestos-containing insulation products. As a result of the foregoing factors, many of the individuals who might have had personal knowledge of the matters to which plaintiffs' interrogatories relate are deceased, or are otherwise unavailable to Owens-Illinois, Inc., and investigations to date indicate that at least some documents which relate to matters inquired about by these interrogatories were transferred to Owens-Corning Fiberglas Corporation with the transfer of the business in question in 1958. Owens-Illinois, Inc. is engaged in a continuing investigation in an attempt to locate, confirm the transfer of, or confirm the absence of, such documents and is also engaged in a continuing investigation into the matters inquired about in

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type) of asbestos containing building and/or insulation product manufactured or sold by Defendant:

- (a) brand or trade name;
- (b) description;
- (c) uses Defendant recommended of it;
- (d) asbestos content;
- (e) dates of manufacture and/or sale.

A. 38. This defendant objects to this interrogatory on the basis that it seeks information which is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence, except as it relates to the period of time during which this defendant engaged in the manufacture, sale and distribution of its Kaylo asbestos-containing products. Without waiving the above objection:

(a) Kaylo.

(b) This defendant ceased the manufacture, sale and distribution of Kaylo asbestos-containing products in 1958. It believes that Kaylo and Kaylo-20 were premolded, light density rigid products, and were manufactured in two forms, block and pipe covering. Kaylo was white or off-white in color, and Kaylo-20 was pinkish in color.

(c) The Kaylo asbestos-containing products manufactured by this defendant were intended to be used for industrial high temperature thermal insulation such as pipe covering and block insulation, and to increase fireproofing and fire protection and for insulation through use as a roof deck or fireproof material or door core material.

(d) This defendant ceased the manufacture, sale and distribution of its Kaylo asbestos-containing products in 1958. Its investigation as to the composition of each such product, including the type of asbestos contained therein (i.e., amosite or chrysotile) and the quantitative percentage of asbestos, is continuing, although this

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STATE OF OHIO)

)SS:

COUNTY OF WOOD)

H. G. BRUSS, being duly sworn according to law, deposes and says that he is an Assistant Secretary of Owens-Illinois, Inc., a defendant herein; that as such he is authorized to make an Affidavit on its behalf; and that the facts set forth in the foregoing DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO INTERROGATORIES, are true and correct to the best of his knowledge, information and belief.

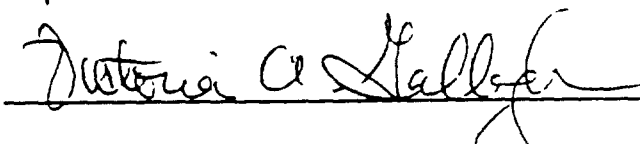


H. G. BRUSS

SWORN TO and subscribed before me this 12 day of January, 1996

My Commission Expires: Sept 22 1997

SEAL



Notary Public

VICTORIA A. GALLAGHER
Notary Public, State of Ohio
My Commission Expires Sept. 22, 1997