PLAINTIFF'S EXHIBIT

K-1992

MORGENSTEIN & JUBELIRER LLP
CHARLES W. LAGRAVE (CSB #80288)
JOHN J. PETRY (CSB #111134)
One Market
Spear Street Tower
Thirty-Second Floor
San Francisco, California 94105
Telephone: (415) 896-0666
Facsimile: (415) 896-5592

Attorneys for Defendant
OWENS-ILLINOIS, INC.

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN FRANCISCO

IN RE: COMPLEX ASBESTOS LITIGATION,	Case No. 828684 **DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO PLAINTIFFS' STANDARD 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

RESPONSE TO INTERROGATORY NO. 28:

Defendant has never engaged in the milling, supplying, distribution, marketing or sale of raw asbestos fiber. This defendant purchased from overseas some asbestos fiber for use in the manufacture of its asbestos-containing products. This defendant engaged in the processing of asbestos to the extent it used some asbestos in the manufacture of its asbestos-containing insulation product.

INTERROGATORY NO. 29:

If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the affirmative, state:

A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or MARKETED in any form or quantity between 1930 and 1985;

B. The date(s) such RAW ASBESTOS was first placed on the market, including the date(s) such RAW ASBESTOS was first marketed; 1. On an experimental basis; 2. On a test basis; 3. For sale.

C. The date(s) such RAW ASBESTOS:

1. Ceased to be produced; or

2. Was recalled from the market, if ever.

D. A description of the chemical composition of such RAW ASBESTOS, including the type and/or grade of asbestos;

E. A description of the physical appearance and nature of such RAW ASBESTOS, including any color coding, distinctive marking and/or logo on the packaging or container;

F. A detailed description of the intended use of such RAW ASBESTOS, including nay temperature limits for each such use;

G. Whether such RAW ASBESTOS was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold. As to each such, state:

I. Whether any of THIS DEFENDANT's RAW ASBESTOS has, at any time, been sold, shipped, or otherwise distributed, used or installed to or at any COMPANY (including power company or utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS DEFENDANT's RAW ASBESTOS has at any time, been sold to any manufacturer, or manufacturing facility, of ASBESTOS-CONTAINING PRODUCTS. If so, state:

1. The names of each such COMPANY, governmental agency or entity, shipyard, distributor, supplier, manufacturer or refinery;

2. The inclusive dates of each such sale, and the amount (quantity) and the trade brand name of such RAW ASBESTOS sold;

3. The manner of shipment (e.g. boat, rail, etc.)

4. Whether you have any records indicating any such sale or shipment and, if so, the name, address and job classification of each person who currently has possession of such records.

5. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

RESPONSE TO INTERROGATORY NO. 29:

(A,D,I) This defendant did not mine, mill supply, distribute, import or market raw asbestos fibers. This defendant believes that the chrysotile which was the primary type of asbestos used in its insulation products was imported from Canada, and that at least some of this chrysotile was purchased from Canadian John-Manville, Ltd. This defendant further believes that the amosite asbestos used in some of its insulation products was imported from South Africa and at least a portion

of such amosite was purchased from the African and European Agencies. This defendant ceased the manufacture, sale and distribution of asbestos-containing products in 1958 and does not have information sufficient to further answer this interrogatory. Its investigation as to the source or sources form which mined asbestos was obtained is continuing.

(B,C,F,H) Not applicable to this defendant.

(E,G) This defendant ceased the manufacture, sale and distribution of its Kaylo asbestos-containing products in 1958. After a reasonable and good faith effort this defendant has not found information sufficient to further answer this interrogatory. Its investigation into the subject matter referred to in this interrogatory is continuing.

INTERROGATORY NO. 30:

Between 1930 and 1985, did YOU ever engage in any of the activities listed below with regard to ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such activity:

A. Supply;

B. Importing;

C. Distribution;

D. Marketing;

E. Sale;

F. Labeling;

G. Manufacturing;

H. Brokering;

RESPONSE TO INTERROGATORY NO. 30:

Owens-Illinois Glass Company began the manufacture, sale and distribution of commercial quantities of "Kaylo" asbestos-containing products in about 1948 and continued such manufacture until about April 30, 1958. In 1953, this defendant entered into a sales agreement with Owens-Corning Fiberglas Corporation under

AFFIDAVIT

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 26th day of JUNE, 1997

My Commission Expires: JULY 19, 1997

SEAL

Notary Public ANDREA M. RODRIGUEZ
Notary Public, State of Ohio
My commission expires 7-19-97

PROOF OF SERVICE

I, MARVIS J. ONG, certify and declare as follows:

I am over the age of eighteen years and not a party to this action. My business address is One Market, Spear Street Tower, 32nd Floor, San Francisco, California.

On June 19, 1997, at San Francisco, California, I served

FIRST SUPPLEMENTAL INTERROGATORY PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 2030(c)(8)

on the parties in this action, by placing for deposit a true copy thereof in a sealed envelope, and each envelope addressed as follows:

SEE ATTACHED LIST

[xx] (By Mail Service) I am readily familiar with the business practice at my place of business for collection and processing of correspondence for delivery by mail. Correspondence so collected and processed is deposited with United states Postal Service on the same day in the ordinary course of business. On the above date the said envelope was collected for the United states Postal service following ordinary business practices.

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

Executed this 19th day of June, 1997, at San Francisco, California.

Marvis J. Ong

MARVIS J. ONG