

FILE NAME: John Crane (JC)

DATE: 2004

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DOCUMENT DESCRIPTION: Legal - John Crane Answers to Interrogatories

**Sworn Answers to Interrogatories by John Crane in the  
Newport News Circuit Court dated  
April 5, 2004**

- **Interrogatory No. 1:** State your correct corporate name, the state of your incorporation, the address of your principle place of business...
- **Answer:** Crane Packing Company was organized in Illinois in 1917. It merged with John Crane Houdaille, a Delaware corporation, on August 3, 1981. On March 27, 1988, Defendant changed its name to John Crane Inc.

Sworn Answers to Interrogatories by John Crane  
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- **Interrogatory: No. 6:** Identify all products which contained any amount of asbestos which you manufactured...:
- (a) the brand name of each product;
- (b) a specific description of the product...;
- (f) the location of each manufacturing facility...

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- **Answer to Interrogatory No. 6:**
- (a-b) See the “John Crane-Houdaille  
General Asbestos Packing Style List”
- (f) Morton Grove, Illinois, 1960-85

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- **Interrogatory No. 7:** As to each product...identify...(e-f) any and all catalogues or data which would have accompanied each product; (g) any and all photographs of the product; (h) any and all samples of the product...
- **Answer:** (e-f) See catalogues attached to Answer 50. (g) None are available except what is shown in the catalogues. (h) John Crane previously gave samples to plaintiffs' counsel...in 1990...John Crane has no other samples to produce.

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- **Interrogatory No. 11:** When and how did you first become aware that any warnings were placed on any asbestos-containing products?
- **Answer:** Defendant first became aware of warnings on bags of raw asbestos about 1980, but it has no records in that regard.

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- **Interrogatory No. 15:** Do you have knowledge of any asbestos-related deaths or any diagnosis of asbestos-related lung disease prior to 1986 among any of your employees...

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**Answer to Interrogatory No. 15:** The claimants  
were:

- (a) Raul Soza (sales)**
- (b) Joseph Leon**
- (c) Jaime Cruz**
- (d) Anthony Edwards**
- (e) James Smail (sales)**
- (f) Sue Payne**

**On information and belief John Crane  
states none of these people claimed they  
had a malignancy of any kind.**

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- **Interrogatory No. 19:** State whether your Board of Directors, prior to 1986, at any time had any meetings which included discussion of or reference to installation, removal, asbestos exposure, the sale, use, or handling of asbestos products, or any alleged health hazards associated with asbestos, any recommendation or discussion of warnings, caution labels, safety procedures, or testing for the asbestos products, any claims for compensation arising out of persons who alleged asbestos related death, disease, abnormality or impairment;
- **Answer:** Defendant has found no record of any such discussions.

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- **Interrogatory No. 20:** Identify your medical officers from 1940 through 1986. If you did not have a medical officer, please identify what person or persons performed functions related to employee health within your company.
- **Answer:** Defendant did not employ a medical officer. It did maintain a first aid station staffed by a nurse.

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- **Interrogatory No. 44:** Prior to 1972, did Defendant ever advise any purchaser or user of asbestos-containing products that there was any threshold limit value which applied to the dust created from the use of asbestos-containing products and/or that the dust associated with the use of asbestos-containing products should be kept below the threshold limit value of five million particles per cubic foot...
- **Answer:** No.

Sworn Answers to Interrogatories in the United States  
District Court for the Eastern District of Virginia Newport  
News Division – January 13, 1988

- **Interrogatory No. 2:** Identify all other manufacturers of each product containing asbestos from whom you bought products...
- **Supplemental Answer 2/12/88 :** John Crane beginning in the 1930's purchased sheet packing at various times from Raybestos-Manhattan Corp., Richard Klinger Co. and Gatke Corporation. The sheet packing was labeled by such sellers for John Crane by imprinting the particular style number on the material, along with the names "John Crane" and/or "Crane Packing Co."

Sworn Answers to Interrogatories in the United  
States District Court for the Eastern District of  
Virginia Newport News Division - January 13, 1988

- **Interrogatory No. 3:** Describe in detail Crane-Houdaille's complete corporate history...
- **Answer:** Crane Packing Company was organized in Illinois in 1917 and began the manufacture and sale of asbestos-containing products about 1930. It merged with John Crane-Houdaille, Inc., a Delaware corporation, on August 3, 1981.

Sworn Answers to Interrogatories in the United  
States District Court for the Eastern District of  
Virginia Newport News Division - January 13, 1988

- **Interrogatory No. 4:** State all components (with percentage amounts) for each product containing asbestos manufactured by Crane-Houdaille...
- **Supplemental Answer 2/12/88:** Sheet packing and gaskets were usually 75% to 85%. Chrysotile fibers was primarily used, though for a few certain special applications crocidilite would have been used.

Sworn Answers to Interrogatories in the United  
States District Court for the Eastern District of  
Virginia Newport News Division - January 13, 1988

- **Interrogatory No. 5:** State the name and address of each entity from whom Crane-Houdaille has ever bought or received raw asbestos fiber...
- **Answer:** John Crane states that its records are incomplete for all of the suppliers of asbestos materials to John Crane but its most common suppliers of such products and materials were: Raybestos-Manhattan; Johns-Manville; Amatex; Richard Klinger, Inc.; Southern Asbestos Southern Textile; Vermont Asbestos Group; Asbestos Corp., Ltd.; Donald R. Fitzgerald Co.; and Gatke Corporation.

Sworn Answers to Interrogatories in the United  
States District Court for the Eastern District of  
Virginia New Port News Division - January 13 1988

- **Interrogatory No. 19:** When did Crane-Houdaille first receive any information that exposure to asbestos might cause illness or disease.
- **Answer:** John Crane first learned of the alleged health hazards of asbestos in approximately 1970 by reason of general publicity surrounding the passage of OSHA.

Sworn Answers to Interrogatories in the United  
States District Court for the Eastern District of  
Virginia Newport News Division - January 13, 1988

- **Interrogatory No. 20:** As to each asbestos associated disease (asbestosis, lung cancer, mesothelioma, etc.) of which Crane-Houdaille is presently aware, state the date that Crane-Houdaille first received any information that said disease process might be caused by exposure to asbestos.
- **Answer:** See response to Interrogatory No. 19.