

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

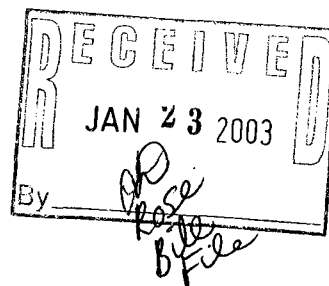
IN RE: ALL ASBESTOS LITIGATION)
FILED BY THE SIMMONS FIRM, LLC)

Plaintiffs,)

vs.)

A.W. CHESTERTON, et al.,)

Defendants.)



CRANE CO.'S RESPONSES TO PLAINTIFFS' INTERROGATORIES

Defendant Crane Co. hereby propounds these Responses to Plaintiffs' Interrogatories.

**PRELIMINARY STATEMENT/GENERAL OBJECTIONS/
RESERVATION OF RIGHTS**

A. The following responses are based upon the information that is presently known and reasonably available to Crane Co. Crane Co. believes these responses are accurate as of the date made. Many matters inquired about in Plaintiffs' Interrogatories ("Discovery Requests") took place decades ago. Due to the passage of time, information may be incomplete or no longer available. Moreover, information sought in the Discovery Requests may be contained in documents housed in various document repositories. Due to the time and expense involved, it would not be practical to review all of those documents in connection with preparing responses to the Discovery

Requests. Nevertheless, Crane Co. has endeavored to investigate all relevant facts and circumstances. The following answers are based upon its investigation. Crane Co. cannot exclude the possibility that its continued investigation may reveal more complete information. Crane Co.'s investigation into the matters inquired into in these Discovery Requests continues. The investigation is dependent upon locating knowledgeable individuals and relevant documents. No finite completion date can be placed upon those efforts. Crane Co. has made a reasonable effort to answer these Discovery Requests to the best of its present knowledge, information, and belief.

B. Crane Co. objects to the Discovery Requests to the extent they (1) are unduly burdensome and overbroad, or (2) seek information that is not relevant to this lawsuit and that is not reasonably calculated to lead to the discovery of admissible evidence. Information not presently known to or readily ascertainable by Crane Co. may be located in various document repositories Crane Co. maintains. Crane Co. has not reviewed the documents stored at those locations, because the expense involved with such an effort would be prohibitive and unduly burdensome. The documents located at the repositories are not organized; and Crane Co. is not able to ascertain whether any documents located within the repositories contain information responsive to the Discovery Requests. The repositories, however, contain numerous documents that are not responsive to the Discovery Requests and which, Crane Co. presumes, may be protected by the attorney-client privilege, the work product doctrine, and/or other applicable privileges and/or protections. Should plaintiffs wish to review the documents located at any of the repositories, Crane Co. will make certain of those documents available to plaintiffs if plaintiffs agree, in writing, that (i) Crane Co. has not

waived any objections it may have with respect to the discoverability of those documents on any ground, all of which objections are expressly reserved, and (ii) Crane Co. may conduct a post-designation review to remove privileged and irrelevant documents from any collection of documents that may be copied for production to plaintiffs, even if plaintiffs had specifically designated the privileged or irrelevant documents for copying. The burden of obtaining responsive information from those documents is the same for plaintiffs as it is for Crane Co.

C. Crane Co. does not concede that any of its answers to the Discovery Requests are or will be admissible evidence at a trial of this action. Crane Co. does not waive any objection on any ground, whether or not asserted herein, to the use of any such answer at trial.

D. Crane Co. objects to the definitions contained in the Discovery Requests to the extent they render the Requests vague, overbroad, and unduly burdensome. In responding to the Discovery Requests, Crane Co. will use the commonly understood, everyday meanings of the terms used. The breadth and volume of the definitions plaintiffs seek to propound would complicate tremendously the task of responding to the Discovery Requests.

E. The foregoing Preliminary Statement and General Objections are incorporated by reference into each of the responses provided hereinafter.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the person answering these interrogatories on behalf of Defendant.

ANSWER: Crane Co.'s answers to these Interrogatories were prepared by Crane Co.'s counsel and are based upon review of numerous documents and interviews with past and present employees.

INTERROGATORY NO. 2:

Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely upon these answers as the truthful and complete answers made on behalf of Defendant? List any and all such sources of information relied upon, including, but not limited to, identifying any and all records or documents reviewed and persons providing information.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome, in that it relates to over 130 Interrogatory answers in addition to multiple subparts. Crane Co. further objects to the phrase "sources of information" as being vague and ambiguous. Subject to and without waiving the foregoing objections, Crane Co.'s responses are based on interviews with past and present employees and its review of many documents. Crane Co. has made a reasonable, good faith effort to respond to these interrogatories. See Preliminary Statement, Sections A & B.

INTERROGATORY NO. 3:

State the following concerning this Defendant:

- (a) Full and correct name;
- (b) The form in which Defendant presently conducts business (i.e. corporation, partnership, proprietorship, etc.);

- (c) Identify any and all predecessors and related companies as defined above;
- (d) Any and all other forms in which defendant has conducted business at any time, and the date(s) when business was conducted in each form;
- (e) Any and all names by which Defendant has been known or has conducted business, at any time, and the date(s) during which Defendant has been known by and/or conducted business, under each such name;
- (f) Defendant's principal place of business;
- (g) Defendant's present state of incorporation or state in which Defendant is registered as a partnership, association, etc., whichever is applicable; if Defendant has, at any time, been incorporated or registered in a different state, identify which state and when;
- (h) Most recent date of incorporation or reincorporation, and any and all prior date(s) of incorporation or reincorporation;
- (i) Whether this Defendant is authorized to transact business in the State of Illinois and, if so, the date such authority was first issued and last renewed;
- (j) If this Defendant has an agent, representative or place of business in Illinois, identify such agent, representative, or place of business; and,
- (k) If this Defendant has an agent for service in the State of Illinois, identify the registered agent.

ANSWER: Crane Co. objects to this interrogatory as being unduly burdensome in the amount of detail requested regarding Crane Co. and its predecessors, which is not relevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the forgoing objections, Crane Co. was originally incorporated in Illinois in or about 1865. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters are located at 100 First Stamford Place, Stamford, Connecticut.

By way of further response, Crane Co. believes that information responsive to this Interrogatory can be derived from Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co. See Answer to Interrogatory Number 19.

INTERROGATORY NO. 4:

Has Defendant been sued under its correct legal name? If not, state the correct legal name of Defendant and provide the information requested in No. 3 above concerning the defendant as correctly named.

ANSWER: Crane Co. was sued under its appropriate corporate name "Crane Co."

INTERROGATORY NO. 5:

Identify any and all persons or entities which own, or at any time have owned, more than a ten percent (10%) interest in this Defendant, and for each such person or entity identified, state the date(s) during which said person or entity owned more than a ten percent (10%) interest in Defendant and the specific type and amount of interest owned.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this

Interrogatory as being unduly burdensome as it requires Crane Co. to provide information spanning its 150 year history. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, in or about 1872, R.T. Crane was the sole owner of the company. As for individuals with greater than 10% interest in Crane Co. since that time, Crane Co. is not presently aware of such information. Crane Co. believes that information relating to the ownership of Crane Co. stock can be derived from Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 6:

Identify any and all companies, businesses, corporations, and/or joint ventures in which this Defendant owns, or at any time has owned, more than a ten percent (10%) interest.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. believes that information responsive to this Interrogatory can be derived from Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 7:

With respect to each corporation, company, business or joint venture identified in response to Interrogatory No. 6 state:

- (a) The type of business, conducted by such related company;
- (b) The past and present business relationship(s) between said related company and Defendant;
- (c) The nature of the products or services which Defendant has sold to, or purchased from, said related company;
- (d) Whether or not said related company advertises or has advertised products or services supplied by Defendant;
- (e) Whether or not said related company sells or has sold Defendant's products or services within the State of Illinois and, if so, the approximate value of those sales from 1930 to date;
- (f) Whether or not said related company pays taxes of any type to the State of Illinois or to any political subdivision thereof and, if so, the type of taxes paid;
- (g) Whether or not Defendant controls or has controlled, directly or indirectly, in whole or in part, said related company's advertising; and,
- (h) The identity of any past or present officer or director of Defendant who, at any time, served as an officer or director of said related company.

ANSWER: See response to Interrogatory No. 6.

INTERROGATORY NO. 8:

List all directors and officers of Defendant from 1940 to date and for each state all positions held and the date(s) during which each position was held.

ANSWER: Crane Co. objects to this Interrogatory as being unduly burdensome in the amount of detail requested regarding Crane Co. and its

directors and officers which is not relevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, information responsive to this Interrogatory covering the time period 1960 to the present may be ascertained by reviewing Crane Co.'s annual reports, Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 9:

State whether any of Defendants' present or former officers or directors ever served (whether before, during or after becoming Defendants' officer or director) as an officer or director of any other company, corporation or business which manufactured, sold or distributed asbestos or asbestos-containing products and, if so, please:

- (a) Identify each officer and director of Defendant, who served as such other company's officer or director; and
- (b) Identify each company, corporation or business for which each such officer or director served, each position held by such officer or director for such other company, corporation or business, and the time periods each position was held.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects because this Interrogatory is overly broad and unduly burdensome in that Crane Co. cannot be expected to know the names of every corporation its officers may have also served in throughout Crane Co.'s 150 year history. Subject to and

without waiving the foregoing objections, information responsive to this Interrogatory may be available in Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 10:

Has Defendant ever acquired, through purchase, reorganization or merger, another company, corporation or business which manufactured, sold, processed, distributed or contracted to apply, asbestos and/or asbestos-containing products?

ANSWER: Crane Co. objects to this Interrogatory as being overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, information responsive to this Interrogatory may be available in Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 11:

If the answer to Interrogatory No. 10 is "Yes," with respect to each such predecessor:

- (a) State its full and correct name;
- (b) State its principal place of business;
- (c) State its State of incorporation;
- (d) State its date and manner of acquisition by Defendant;
- (e) Whether this predecessor was, at any time, authorized to transact business in the State of Illinois; and
- (f) Identify any and all documents referring to, relating to or reflecting the acquisition.

ANSWER: See objections and response to Interrogatory No. 10.

INTERROGATORY NO. 12:

Has Defendant ever acquired from another corporation, company, or business, by any means other than those specified in Interrogatory No. 10, assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products?

ANSWER: Crane Co. objects to this Interrogatory because it is vague, ambiguous, and duplicative. Subject to and without waiving the foregoing objections, information responsive to this Interrogatory covering the time period 1960 to the present may be ascertained by reviewing Crane Co.'s annual reports, Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 13:

If the answer to Interrogatory No. 12 is "Yes," with respect to each such acquisition:

- (a) State the full and correct name of the company from which such assets or rights were acquired;
- (b) State the principal place of business of the company from which said assets or rights were acquired;
- (c) Describe the assets or rights acquired, including the specific asbestos-containing products to which said assets or rights related; and
- (d) Identify any and all documents referring to, relating to or reflecting the transaction.

ANSWER: See objections and response to Interrogatory No. 12.

INTERROGATORY NO. 14:

Other than any transaction identified in response to Interrogatories Nos. 10-13, has this Defendant ever been involved, in any capacity, including but not limited to, seller, transferor, grantor, franchisor, licensor, buyer, transferee, grantee, franchisee or subject of the transaction, in any transaction, of any kind, concerning any of the following:

- (a) the purchase/sale or transfer of ownership of a company, corporation or business which manufactured, sold, processed, distributed or contracted to apply asbestos and/or asbestos-containing products; or
- (b) the purchase/sale or transfer of ownership of the assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products; or
- (c) the purchase/sale or transfer of liabilities arising out of the manufacture, sale, processing, distribution or application of asbestos or asbestos-containing products.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to the term "transaction" as being vague and ambiguous. Subject to and without waiving the foregoing objections, information responsive to this Interrogatory covering the time period 1960 to the present may be ascertained by reviewing Crane Co.'s annual reports, Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 15:

If the answer to any sub-part of Interrogatory No. 14 is "Yes," with respect to each such transaction:

- (a) Identify all parties to the transaction;
- (b) Identify the subject matter of the transaction;
- (c) State the date of the transaction; and,
- (d) Identify any and all documents, referring to, relating to or reflecting the transaction.

ANSWER: See objections and response to Interrogatory No. 14.

INTERROGATORY NO. 16:

State the first and last dates on which any asbestos-containing product was manufactured by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER: Crane Co. objects to this Interrogatory to the extent it assumes that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. was not a manufacturer of asbestos-containing products as it understands that term and as that term is commonly used in asbestos litigation.

INTERROGATORY NO. 17:

State the first and last dates on which any asbestos-containing product was specified, sold, distributed, applied and/or installed within the United States by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited in time or geographic scope. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. placed on the market industrial

valves that may have contained asbestos-containing materials within their metal structure as early as 1858. Asbestos was removed as a component from Crane Co.'s industrial valves in the mid-1980's, with the exception of one specific type of valve designed for petroleum industry applications, which – in accordance with published industry requirements – incorporated an asbestos component until the early 1990's. In all cases, asbestos was eliminated as a component of Crane Co. products because of decreased consumer demand for products that incorporated asbestos and/or Crane Co.'s inability to obtain asbestos-containing components.

INTERROGATORY NO. 18:

State the last date on which Defendant or any related company specified, sold, distributed, applied and/or installed any asbestos-containing product outside the United States and identify by brand or trade name the products so specified, sold, distributed, applied and/or installed.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and seeks information that is not relevant to this action, and is not likely to lead to the discovery of additional evidence. There is no indication that plaintiffs were exposed to asbestos-containing products allegedly manufactured or supplied by Crane Co. outside the United States.

INTERROGATORY NO. 19:

Identify by full and complete trade name, any and all asbestos-containing products as defined above, which this Defendant, any related company, or any predecessor(s) has, at any time:

- (a) Designed;
- (b) Manufactured;
- (c) Processed;
- (d) Sold;
- (e) Distributed;
- (f) Applied;
- (g) Installed;
- (h) Patented;
- (i) Specified; or
- (j) Re-labeled.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and seeks information neither relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence. Crane Co.'s response to this Interrogatory shall not be construed as an admission that Crane Co. was involved in any activity with respect to asbestos-containing products that are relevant in any way to this lawsuit.

Subject to the foregoing, Crane Co. was not a manufacturer of any asbestos-containing product, as that term is defined and as it is commonly used in asbestos litigation. Crane Co. is and has been a manufacturer of certain types

of industrial equipment. Crane Co.'s principal line of industrial equipment throughout the time period requested in this interrogatory was industrial valves. Industrial valves manufactured by Crane Co. were made of steel, bronze, and other metals; the valves themselves were not composed of asbestos. Many of those valves bore the name "Crane," marked directly on the valve. Certain of the valves had enclosed within their metal structure asbestos-containing gaskets, packing, or discs. Crane Co. did not manufacture the asbestos-containing components that may have been encapsulated within the valves, but purchased them from other companies. Any components that may have been enclosed within the metal structure of Crane Co. valves did not emit friable or respirable asbestos fibers while enclosed within that structure. Any asbestos-containing components were completely encapsulated within the metal structure of the valves. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component, itself, by a rubber-like compound.

Crane Co. acquired around and subsequent to 1961 the assets of several industrial pump companies that became divisions of Crane Co. Subsequent to those acquisitions, Crane Co. manufactured industrial pumps that may have incorporated within their metal structure an encapsulated asbestos-containing gasket and/or asbestos-containing packing. Crane Co. did not, however, manufacture the asbestos-containing components, such as gaskets or packing, contained in the industrial pumps. It purchased those components from other companies. Any components that may have contained asbestos were enclosed

within the metal structure of Crane Co. industrial pumps and did not emit friable or respirable asbestos fibers while enclosed within that structure. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. manufactured boilers in the late 1800s, a practice which it appears to have discontinued prior to 1900. Crane Co. resumed manufacturing boilers in or about 1931, suspended those operations during World War II, and discontinued that practice in the 1950s. At least some of the boilers Crane Co. manufactured through, at least, the early 1940s, contained asbestos insulation. For a brief period of time after it ceased manufacturing boilers, Crane Co. sold boilers that were manufactured, at least in part, by another company. In the 1960s, Crane Co. purchased the assets of two boiler companies, which it resold a few years later. To the best of Crane Co.'s knowledge, however, the boilers, water heaters, and furnaces that Crane Co. manufactured with those acquired assets contained fiberglass, not asbestos, insulation. After it sold those assets, Crane Co. may have sold boilers, water heaters, and furnaces that it purchased from other entities. It is believed, however, that those items contained fiberglass, not asbestos, insulation.

For a period of time believed to be less than two years during the early 1960's, Crane Co., through its division Crane-Midwest Piping, was involved with the erection of piping systems in limited geographic areas. In connection with that erection business, Crane Co. is presently aware of one project to which

Crane Co. sent flat gaskets that, most likely, contained some asbestos as part of their chemical and physical composition.

Crane Co., through a division, sold industrial water treatment systems, including deaerators, water conditioners, multi-port steam relief valves, drainers, sample coolers, and condensate boosters. Those products were composed primarily of metal; they were not composed of asbestos. Depending on the application for which it was to be used, some of this equipment incorporated internal components, primarily cloth gaskets, manufactured by others, that may have contained some asbestos as part of their chemical composition. Those components were enclosed within the equipment and were not exposed during installation or normal use of the product. Prior to the mid 1980's, Crane Co. may have sold replacement gaskets for use in the industrial water treatment systems. To the best of Crane Co.'s knowledge, Crane Co. did not manufacture any of the internal components, but purchased them from other companies.

Crane Co. also offered for sale certain products manufactured by other companies. A small quantity of those products may have contained asbestos. Crane Co. offered for sale gaskets, packing, and discs manufactured by other companies that may have contained asbestos. Material called Cranite was manufactured exclusively for resale by Crane Co., during the relevant time period through what appears to be the early-to-mid 1970s, but perhaps extending to the early 1980s. The finished "Cranite" products had the name "Cranite" stamped directly upon them. Any asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of

any friable asbestos fibers. In addition, Crane Co. offered for sale products manufactured by others at many of its branch locations. Some of these products contained asbestos. Most of those products are listed in Crane Co.'s catalogs which will be made available to plaintiffs at a mutually agreeable time and place.

By way of further response, over the years, Crane Co. has held numerous patents for the equipment that it manufactured. Crane Co. did not hold a patent for Cranite. By way of further answer, Crane Co. is presently unaware of whether any products mined or manufactured by others but sold, marketed, or distributed by Crane Co., were patented. Subject to Crane Co.'s understanding of the term "re-labeled", Crane Co. was not a re-labeler.

Crane Co.'s investigation of its activities regarding asbestos-containing products continues. That investigation is dependent upon locating knowledgeable individuals and/or information on an ongoing basis. No finite completion date can be placed upon those ongoing efforts. Crane Co. has made a reasonable effort to answer these Interrogatories. See also Preliminary Statement, § B.

INTERROGATORY NO. 20:

With respect to each asbestos-containing product listed for each subpart of Interrogatory No. 19:

- (a) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product;
- (b) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product; and,

- (c) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product.

ANSWER: See objections and responses to Interrogatory No. 19. Subject to and without waiving the foregoing objections, Crane Co. believes that information responsive to this Interrogatory can be derived from Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

INTERROGATORY NO. 21:

Were any of the products, which were listed in response to Interrogatory No. 19 as having been specified, sold, distributed, applied or installed by Defendant, its predecessor or related company(ies), purchased from another company and relabeled for sale or distribution by Defendant, its predecessors or related companies? If so, identify those products, and with respect to each:

- (a) Identify the company from which Defendant, its predecessor or related company purchased the product; and,
- (b) Identify the company which manufactured the product; and,
- (c) State the date(s) during which said re-labeled product was sold, distributed or applied.

ANSWER: See objections and response to Interrogatory No. 19.

INTERROGATORY NO. 22:

Has this Defendant, at any time, applied, contracted to apply, installed or engaged in the business of applying or installing, asbestos-containing products? If so:

- (a) State the date(s) on which or during which Defendant applied, contracted to apply, installed or engaged in the business of applying or installing asbestos-containing products;
- (b) Identify any and all sites within the State of Illinois at which Defendant applied, installed or contracted to apply or install asbestos-containing products, and for each such site:
 - (i) State whether the products you applied, installed or contracted to apply or install were included as part of the project's contract price or whether you applied the products that were provided at the worksite;
 - (ii) Identify by manufacturer and trade name each and every asbestos-containing product applied or installed;
 - (iii) State the date(s) during which said application or installation took place;
 - (iv) Identify the employee(s) of Defendant who was (were) in charge of the job;
 - (v) Identify the person or entity for which the products were applied or installed; and
 - (vi) Identify all documents relating to such contract, application or installation.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited in time or geographic scope. Subject to and without waiving the foregoing objections, Crane Co. did not have a business unit devoted specifically to the application or removal of asbestos-containing products. Crane Co. was, for a brief period of time, involved in erecting piping systems, as set forth in its response to Interrogatory No. 19.

INTERROGATORY NO. 23:

Has this Defendant, any predecessor or any related company, ever engaged in the business of mining asbestos? If so:

- (a) Identify which company(ies) whether (Defendant, predecessor or related company) engaged in said business;
- (b) State the date(s) during which each said company engaged in such business;
- (c) State each and every location at which such mining was done;
- (d) Identify each and every officer, employee and/or agent of said company who, at any time, was in charge of each mining operation; and,
- (e) Identify each and every entity, if any, to which said company sold the asbestos which was mined.

ANSWER: Subject to the foregoing General Objections, no.

INTERROGATORY NO. 24:

Has this Defendant, any predecessor or any related company ever purchased and resold raw asbestos? If so, with respect to each such purchase and resale:

- (a) State the date(s) of the transaction;
- (b) Identify any and all parties from which the raw asbestos was purchased; and,
- (c) Identify any and all parties to which the raw asbestos was sold.

ANSWER: Subject to the foregoing General Objections, to the best of Crane Co.'s present knowledge, no.

INTERROGATORY NO. 25:

Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No. 19.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome, overbroad and seeks information that it is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products.

Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of all of the entities from which it obtained asbestos-containing components for its industrial products. Nevertheless, based upon available documents, it appears that, at various times, Crane Co.'s approved suppliers may have included B.F. Goodrich Co., Goodyear Tire & Rubber Co., and Sweet Rubber Co. of Akron, Ohio, with respect to "Cranite" material, Raybestos-Manhattan, Inc., Garlock, Inc., Johns-Manville, Inc., "Klingerit" and Nicolet, Inc., with respect to sheet gasket material, Crane Packing Co. (later John Crane-Houdaille, Inc.), Anchor Packing, Raybestos-Manhattan, Greene-Tweed, Garlock, Inc., Johns-Manville, Inc., Lindstrom & King, and R.M. Industrial Products with respect to valve packing, Flexitallic, Spirotallic, Lamons Gasket Co., and R-Way Gasket & Supply Co., with respect to spiral wound gaskets. Johns Manville, Inc. and Keasby Mattison with respect to cement pipe, and Johns Manville, Inc. with

respect to other miscellaneous products. The foregoing list is not intended to be an exhaustive list of Crane Co.'s suppliers. See Preliminary Statement, § B.

INTERROGATORY NO. 26:

Is Defendant or any related company, as of the date of answering these interrogatories, still manufacturing, specifying, selling, distributing, applying or installing any asbestos-containing product? If so, give the brand/trade names of such products, type and percentage of asbestos in such product, and the date on which Defendant or any related company first manufactured, specified, sold, distributed, applied or installed said products.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no.

INTERROGATORY NO. 27:

With respect to each and every product listed in response to Interrogatory No. 19, provide a full and complete description of the package in which the product was sold, including, but not limited to, type of package, size, color and writings thereon.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any particular

“packaging” that may have been associated with its products beyond the information contained in its response to Interrogatories 19 and the product catalogs that Crane Co. is willing to produce in this matter.

INTERROGATORY NO. 28:

For each subpart below, state whether or not, to Defendant's knowledge, any items as described therein presently exist and, if so, identify any and all such existing items and state the present location of each:

- (a) any product listed in response to Interrogatory No. 19, including, but not limited to, any sample, part or piece thereof;
- (b) any package of the type in which any or all of the products listed in response to Interrogatory No. 19 were or would have been sold, including, but not limited to, any partial package;
- (c) any catalogue, brochure, sales literature or like item referring to, relating to or reflecting any or all of the products listed in response to Interrogatory No. 19;
- (d) any picture, drawing, photograph or like representation of the items described in subparts (a), (b) and/or (c) of this Interrogatory.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. presently possesses valves and pumps similar to those that contained asbestos-containing components. Crane Co. also possesses two discs that may contain asbestos, which are in the possession of Counsel. Crane Co. further possesses catalogs depicting its industrial

equipment and some asbestos-containing products. Crane Co. also possesses technical drawings for its industrial equipment.

INTERROGATORY NO. 29:

Did Defendant, any related company or any predecessor ever stamp or otherwise place (including affixing tags or labels) a company name, initials, or any identifying logo on any of the products listed in response to Interrogatory No. 19?

ANSWER: See objections and response to Interrogatory No. 19.

INTERROGATORY NO. 30:

If your answer to Interrogatory No. 29 is "Yes," identify each and every such product upon which such name, initials or identifying logo appeared and for each such product identified:

- (a) Describe each and every name, initials or identifying logo appearing on said product, at any time, by stating the wording, lettering, symbols, size, color and manner in which it was stamped, placed or affixed to said product;
- (b) State the date(s) during which each such name, initials, or identifying logo appeared on said product; and
- (c) Identify any and all documents referring to, relating to or reflecting the stamping, placing or affixing of names, initials or logos to said product, including, but not limited to, any pictures, photographs or like representations of such names, initials or logos

ANSWER: See objections and response to Interrogatory No. 19, by way of further response information responsive to this Interrogatory may be available in Crane Co.'s catalogs. Crane Co. will make its catalogs available to plaintiffs at a mutually agreeable time and place.

INTERROGATORY NO. 31:

Was each of the asbestos-containing products listed in response to Interrogatory No. 19 generally expected to reach, or was each packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER: Crane Co. objects to this Interrogatory on the grounds that the term "substantial change" is vague and ambiguous, and to the extent it implies that Crane Co. manufactured any asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. generally expected the products referenced in its Answer to Interrogatory No. 19 to reach the purchaser in the same condition in which they were delivered.

INTERROGATORY NO. 32:

If your answer to Interrogatory No. 31 is "No" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user.

ANSWER: See objections and response to Interrogatory No. 31.

INTERROGATORY NO. 33:

With respect to each product listed in response to Interrogatory No. 19, state whether, based upon the material contents, the method of manufacturing, and the method of application, such product could generally be applied or installed without liberating asbestos fibers?

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects to this Interrogatory to the extent it is framed in the present tense. Subject to and without waiving the foregoing objections, Donna M. Ringo CIH, the expert industrial hygienist whom Crane Co. has retained to assist it in this litigation, has opined that "the fiber release associated with the use, handling, and removal of asbestos-containing gaskets and packing products do not present a hazard to users in the workplace or bystanders. The de minimus, if any, fiber release associated with the use, handling, installation, and removal of these products is significantly below current OSHA regulatory exposure levels."

INTERROGATORY NO. 34:

With respect to each product listed in response to original Interrogatory number 19, could it be expected or anticipated that the product might have to be removed, stripped or replaced at any time after application or installation?

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 35:

Identify each person who participated in the design and/or preparation of manufacturing specifications for each product listed in response to Interrogatory No. 19.

ANSWER: Crane Co. objects to this Interrogatory because it is overbroad and unduly burdensome, is not reasonably calculated to lead to the discovery of

admissible evidence, and seeks information that is not relevant to these actions. Crane Co. further objects to this Interrogatory as being overly broad and unduly burdensome because Crane Co. cannot possibly list every employee who may be responsive to this request. Subject to and without waiving the foregoing objections, Crane Co. did not provide manufacturing instructions for asbestos-containing products, because it never manufactured asbestos-containing products as it understands those terms. Crane Co. did prepare detailed purchasing specifications for Cranite material, which will be produced to plaintiffs at mutually agreeable time and place, and which identify individuals who were involved with those specifications. Crane Co. has had numerous employees involved with the design of industrial equipment. It would be unduly burdensome to require it to identify each of those employees. Nevertheless, Crane Co.'s former Director of Engineering, William McLean, was involved with the design of industrial valves from at least 1955 to 1986.

INTERROGATORY NO. 36:

Identify any and all documents, including, but not limited to, written memoranda, specifications, blueprints, formulas, patterns and designs, referring to, relating to or reflecting the design, preparation, application and/or installation of each product listed in response to Interrogatory No. 19.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this

Interrogatory because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, see response to Interrogatory No. 28.. See Preliminary Statement, Section B.

INTERROGATORY NO. 37:

With respect to each product listed in response to Interrogatory No. 19, state:

- (a) The type of asbestos contained in the product as it was first manufactured;
- (b) The percentage of asbestos contained in the product as it was first manufactured;
- (c) Any modification to the product which altered the percentage or type of asbestos in the product and the dates of such modification;
- (d) The source of asbestos in each product;
- (e) The color, physical characteristics, and appearance of each product;
- (f) Any and all other names under which the product was sold, at any time;
- (g) The number and date of each patent or patent application for each product;
- (h) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person(s) who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (i) If the product is no longer produced, all reasons it was discontinued, the identity of the person(s) who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production; and
- (j) The reasons why asbestos was used as an ingredient in each such product.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing

objections, see objections and responses to Interrogatories Nos. 17 and 19. By way of further response, Crane Co. cannot provide specific information in this regard, because, inter alia, any asbestos-containing product it would have sold were manufactured by others. According to its technical specifications, however, Cranite "sheet packing" was comprised of 75%-85% chrysotile asbestos, the balance consisting of a natural rubber binder and inert fillers. Cranite "sheet packing" was sold in sheet and pre-cut gasket form. Any asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of any friable asbestos fibers.

INTERROGATORY NO. 38:

Identify any and all facilities at which Defendant, any predecessor or any related company, at any time, manufactured or processed asbestos-containing products, or processed raw asbestos. For each such facility identified:

- (a) State the date(s) which said facility was owned and/or operated by Defendant, any predecessor or any related company;
- (b) State the date(s) during which asbestos-containing products and/or raw asbestos were manufactured or processed, at said facility; and,
- (c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by Defendant, any predecessor or any related company, and state the date(s) of the tenure as manager or supervisor for each.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible

evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products.

Subject to and without waiving the foregoing objections, to the best of its present knowledge and according to its annual reports, without limitation, Crane Co. assembled and/or manufactured valves at plants located in Chicago, Illinois; Chattanooga, Tennessee; Indian Orchard, Massachusetts; Jonesboro, Arkansas; Rogers, Arkansas; Long Beach, California; and Washington, Iowa; pumps at plants located in Rogers, Arkansas; Salem, Ohio; and Warrington, Pennsylvania; deaerators at a plant located in King of Prussia, Pennsylvania; and boilers at plants located in Pennsylvania and New Jersey. Crane Co. also manufactured other products at other locations. Crane Co. did not ever manufacture or assemble any of the asbestos-containing components that may have been included in the pumps, valves, deaerators, or boilers. Accordingly, those components would not have been manufactured at any of the locations listed above. See response to Interrogatory No. 19; see also Preliminary Statement, § B.

INTERROGATORY NO. 39:

Identify any and all entities to which the defendant, any predecessor or related company, sold, distributed or otherwise provided any type of asbestos-containing product, including but not limited to, the products listed in response to original Interrogatory number 19, and which the defendant has any reason whatsoever to suspect, believe, think or otherwise conclude that said asbestos-containing product was installed, applied, stored, or anyway made use of at any site identified in the interrogatory answers of any plaintiff with a claim against this defendant, at any site

located in Madison County, Illinois, or at any site within a 200 mile radius of Madison County, Illinois.

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 40:

Identify any and all persons known by you to have any knowledge concerning the manufacture, sale, distribution, possession, application, installation or use of the products listed in response to Interrogatory No. 19.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that Crane Co. has been in existence for 150 years. Providing a list of all known employees who may be responsive to this Interrogatory would be unduly burdensome. As it presently reads, plaintiff's Interrogatory is incapable of a meaningful response.

INTERROGATORY NO. 41:

Has Defendant, any predecessor or any related company, at any time, designed, manufactured, processed, sold, distributed, supplied, applied, installed or contracted to apply or install any product which contained vermiculite?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence because it does not relate to asbestos. Subject to and without waving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 42:

If your answer to Interrogatory No. 41 is "Yes," identify by brand/trade name any and all such products which contained vermiculite and for each:

- (a) State the date(s) during which said product contained vermiculite;
- (b) State, in percentage terms, the amount of vermiculite contained in the product;
- (c) Identify the source of the vermiculite used in the product;
- (d) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (e) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (f) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (g) State whether any sample, part or piece of such product is still in existence; and
- (h) Identify all documents relating to such product, including but not limited to any package, brochure, catalog, picture, photograph or like representation of the product or packaging.

ANSWER: See objections and response to Interrogatory No. 41.

INTERROGATORY NO. 43:

With respect to the products listed in response to Interrogatory Nos. 19 and 42, did Defendant, any predecessor or related company or the manufacturer of the products ever conduct tests of any kind on any or all of said products concerning possible or potential health hazards involved in its use or in the use of materials contained therein?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and (ii) that there were any health hazards involved with its products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful when used as intended, and therefore, Crane Co. did not conduct any tests regarding any potential health hazards associated with asbestos.

INTERROGATORY NO. 44:

If your answer to Interrogatory No. 43 is "Yes," with respect to each product test:

- (a) State the location where the test was performed;
- (b) Identify each and every individual who conducted or participated in said test;
- (c) Describe the results of said test;
- (d) State the date or dates upon which said test was conducted;
- (e) Identify any and all documents referring to, relating to or reflecting said test or the results thereof; and
- (f) Identify each and every individual who received a copy of any document referring to, relating to or reflecting the results of said test.

ANSWER: See objections and response to Interrogatory No. 43.

INTERROGATORY NO. 45:

Did any person, including but not limited to, an officer, agent or employee of Defendant, any predecessor or related company recommend any design changes as a result of any test referenced in your response to the preceding interrogatory?

ANSWER: **See** objections and response to Interrogatory No. 43.

INTERROGATORY NO. 46:

If your answer to Interrogatory No. 45 is "Yes," with respect to each such recommended design change:

- (a) State the product or products involved;
- (b) State the test or tests involved;
- (c) State the nature of the change recommended;
- (d) Identify the person(s) making the recommendation;
- (e) State the nature and effective date of any change made; and
- (f) Identify each and every person who participated in the decision to make or not make the recommended design change.

ANSWER: **See** objections and response to Interrogatory No. 45.

INTERROGATORY NO. 47:

Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or in a similar position.

ANSWER: Crane Co. objects to this Interrogatory because it assumes facts not in evidence. Crane Co. further objects that this Interrogatory seeks information that is not relevant to these actions, and because it is overly broad,

unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it does not know of any physician or industrial hygienist that Crane Co. employed with respect to asbestos issues, outside those retained in connection with asbestos litigation. See Preliminary Statement, § B.

INTERROGATORY NO. 48:

Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

ANSWER: Crane Co. objects to this Interrogatory because it assumes facts not in evidence. Crane Co. further objects that this Interrogatory seeks information that is not relevant to these actions, and because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it does not know of any physician or industrial hygienist that Crane Co. employed with respect to asbestos issues, outside those retained in connection with asbestos litigation. See Preliminary Statement, § B.

INTERROGATORY NO. 49:

Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so:

- (a) State when such department was established, and whether or not such department has operated continuously since being established;
- (b) State how much Defendant, its predecessor and/or related company expended each year on research; and
- (c) State the percentage of said expenditure which was for research concerning the health affects of asbestos;
- (d) Identify the person(s) in charge of such department throughout its existence; and
- (e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome, and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have a Research Department devoted to asbestos issues. See Preliminary Statement, §B.

INTERROGATORY NO. 50:

Did Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so:

- (a) State the dates such library existed;
- (b) State the number of volumes maintained therein;

- (c) State the number of employees, part-time or full-time, assigned to the maintenance of said library; and
- (d) Identify the person(s) within the corporate structure to whom said library employees reported throughout the existence of the library.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome, and seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have a Medical Department devoted to asbestos issues, nor did it maintain a library specific to asbestos issues. See Preliminary Statement, §B.

INTERROGATORY NO. 51:

Identify any and all scientific or medical periodicals to which Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, subscribed from 1940 to the present, and for each periodical state the dates of such subscriptions.

ANSWER: Crane Co. objects to this Interrogatory as being overly broad and unduly burdensome. Crane Co. further objects to this Interrogatory because it seeks information not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. cannot identify all the specific periodicals that may have been received by its employees over the last 62 years. If plaintiffs are interested in a specific periodical please provide the name of such periodical. See Preliminary Statement, Section B.

INTERROGATORY NO. 52:

Has Defendant, any predecessor or any related company, at any time since 1940:

- (a) been a member of a medical and/or scientific library or library association?
- (b) been a member of any organization or association which maintained a medical and/or scientific library?
- (c) been a member of any organization or association through which members obtained the use of, or access to, a medical and/or scientific library?

ANSWER: Crane Co. objects to this Interrogatory as being overly broad and unduly burdensome. Crane Co. further objects to this Interrogatory because it seeks information not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, Crane Co. is not presently aware of being a member of any group or association with respect to asbestos issues. See Preliminary Statement, Section B.

INTERROGATORY NO. 53:

If your answer to any subpart of Interrogatory No. 52 is "Yes" :

- (a) Identify the library(ies) involved and state the years during which Defendant, its predecessor or related company was a member of, or otherwise had use of or access to said library; and
- (b) If applicable, identify the organization or association through which Defendant, its predecessor or related company, obtained the use of or access to, such library(ies).

ANSWER: See objections and response to Interrogatory No. 52.

INTERROGATORY NO. 54:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to, any insurance company, at any time, conducted any industrial hygiene surveys concerning any product identified in response to Interrogatory No. 19, including, but not limited to, surveys concerning the manufacture, processing, application, installation, use and/or removal of said products?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, internal counts were performed on two occasions. Results from both counts indicated release of fibers at no greater than background levels. In 1987, Crane Co. retained Particle Data Laboratories, Ltd. and Standard Testing and Engineering Company to conduct a monitoring of two of its industrial facilities. Both of these efforts indicated that individuals involved with removing packing from valves were exposed to little, if any, asbestos.

INTERROGATORY NO. 55:

If your answer to Interrogatory No. 54 is "Yes," with respect to each such survey:

- (a) Identify the product(s) which was used in the survey;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said survey;
- (c) State the date(s) of said survey;

- (d) Describe the methodology, results and conclusions of said survey;
- (e) Identify any and all documents referring to, relating to, or reflecting said survey or the results and conclusions thereof; and,
- (f) Identify any and all persons to whom such document may have been sent.

ANSWER: See objections and response to Interrogatory No. 54.

INTERROGATORY NO. 56:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to any insurance company, at any time, gone into any area where any product identified in response to Interrogatory Nos. 19 and 42 was being manufactured, used, applied or installed to perform a dust level count or similar test?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, internal counts were performed on two occasions. Results from both counts indicated release of fibers at no greater than background levels.

INTERROGATORY NO. 57:

If your answer to Interrogatory No. 56 is "Yes," identify each such count or test performed, by stating when and where it was conducted, and with respect to each count or test so identified:

- (a) Identify the product being manufactured, used, applied or installed;
- (b) Identify each and every person who conducted, participated in conducting, or analyzed the results of, said count or test;
- (c) State the purpose of said count or test;
- (d) State what, if any, actions were taken in response to the results of said count or test; and
- (e) Identify any and all documents referring to, relating to or reflecting said count or test, including, but not limited to, any actions taken in response to the results of such count or test.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, see responses to Interrogatory Nos. 54 and 60.

INTERROGATORY NO. 58:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies), of any kind, concerning the effects of the inhalation of asbestos dust or asbestos fibers on one using or being exposed to asbestos or any asbestos-containing product, including, but not limited to, those identified in response to Interrogatory Nos. 19 and 42?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any

asbestos-containing products and (ii) that there were any health hazards involved with its products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any products it sold were harmful when used as intended, and therefore, Crane Co. did not conduct any tests regarding any potential health hazards associated with asbestos.

INTERROGATORY NO. 59:

If your answer to Interrogatory No. 58 is "Yes," with respect to each such study:

- (a) Describe the nature of said study, including, but not limited to, the purpose and objectives of the study, the product(s) involved, the date(s) conducted, the methodology employed and the results reached, both raw data and conclusions;
- (b) Identify any and all entities and/or persons conducting said study or participating in the conducting of said study;
- (c) Identify any and all documents referring to, relating to or reflecting said study, including but not limited to reports (both interim and final), notes, memoranda, work papers, data compilations and surveys;
- (d) Identify any and all directors, officers, agents or employees of Defendant who participated in the decision to have the study conducted; and,
- (e) Identify any and all entities and/or persons who received a copy of any document referring to, relating to or reflecting the results or conclusions reached.

ANSWER: See objections and response to Interrogatory No. 58.

INTERROGATORY NO. 60:

Did Defendant, its predecessor or related company, take any action as a result of any study or studies set forth in response to Interrogatory Nos. 56 and 58? If so, identify each and every study which resulted in some action being taken, and:

- (a) Describe the actions taken, including the effective date of said actions;
- (b) Identify any and all persons, including, but not limited to, directors, officers, agents and employees of Defendant who participated in the decision to undertake said actions; and
- (c) Identify any and all documents referring to, relating to or reflecting said actions, or any subsequent modification or discussion of the same.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, with respect to the two internal counts results from both counts indicated release of fibers at no greater than background levels. As such, no action was necessary.

INTERROGATORY NO. 61:

Has Defendant, any predecessor, or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies) designed to minimize or eliminate the inhalation of asbestos dust and fibers by those using, handling or exposed to any product listed in response to Interrogatory Nos. 19 and 42?

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products, and (ii) that anyone was exposed to asbestos dust or fibers from Crane Co.'s products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful when used as intended, and therefore, conducted no such studies.

INTERROGATORY NO. 62:

If your answer to Interrogatory No. 61 is "Yes," with respect to each such study:

- (a) Identify the product involved;
- (b) Identify the person(s) and/or entity(ies) conducting said study;
- (c) State the date said study began and the date on which it was completed;
- (d) Identify any and all persons, including, but not limited to, directors, officers, agents or employees of Defendant, who participated in the decision to have said study conducted;
- (e) Describe the nature of said study;
- (f) Describe the nature of any action to eliminate or minimize inhalation of asbestos dust or asbestos fibers undertaken as a result of said study;
- (g) Identify any and all documents referring to, relating to or reflecting said study or the results thereof; and,
- (h) Identify any and all persons receiving a copy of any document referring to, relating to or reflecting the results or conclusions of said study.

ANSWER: See objection and response to Interrogatory No. 61.

INTERROGATORY NO. 63:

Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii)

there was any possibility of injury resulting from the use of a Crane Co. product. Crane Co. further objects to this Interrogatory as being ambiguous, overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, the only "warning" or instructions distributed in the United States associated with any Crane Co. industrial product regarding asbestos was a notification which first appeared in the mid-1980s, attached to certain industrial valves that informed the user that asbestos-containing materials were contained within the valve. That warning read as follows: "CAUTION - Contains Asbestos Packing or Gasket". See objections and response to Interrogatory No. 10; see also Preliminary Statement, § B.

INTERROGATORY NO. 64:

Did Defendant, any predecessor or any related company, at any time, place any warning signs or labels on the containers in which any of the products listed in response to Interrogatory Nos. 19 and 42 were packaged?

ANSWER: See objections and response to Interrogatory No. 63.

INTERROGATORY NO. 65:

If your answer to Interrogatory No. 64 is "Yes," identify each and every product upon which such a warning was placed, and with respect to each such product identified:

- (a) State the date on which any order directing that a warning be placed on said product first issued;
- (b) Identify any and all persons participating in the decision to issue that order;
- (c) State the first date on which such warning was actually placed on said product;
- (d) State the first date on which such product accompanied by such warning was first sold, distributed or installed;
- (e) State the exact wording of this first warning;
- (f) State the exact location and size of this first warning as it appeared on said product;
- (g) Identify any and all persons who participated in any phase of the drafting or design of said first warning, including, but not limited to, those who performed the actual drafting and design work, those who reviewed the work, those who edited the work and those who approved the warning;
- (h) State why you placed such warning on said product, including, but not limited to, whether you placed such warning on said product because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute; and
- (i) Identify any and all documents referring to, relating to or reflecting, said warning, its drafting, and/or the decision to place the warning on said product, including, but not limited to, any communication as described in subpart (h) of this Interrogatory.

ANSWER: See objections and response to Interrogatory No. 63.

INTERROGATORY NO. 66:

With respect to each product identified in response to Interrogatory No. 65 as having been accompanied by a warning, state whether, subsequent to the first warning described above, any different warning was ever placed upon said product. Any alteration, change or modification in the language, wording, capitalization, punctuation,

style of type or printing, size, color, or location on the package or container, of the warning constitutes a different warning.

ANSWER: Crane Co. objections to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the forgoing objections, Crane Co. is not presently aware of any "warnings" other than the one identified in response to Interrogatory No. 63. See Preliminary Statement, Section B.

INTERROGATORY NO. 67:

With respect to each different warning which accompanied each product listed in response to Interrogatory No. 65:

- (a) State the date on which any order directing that such different warning be placed on said product first issued;
- (b) Identify any and all persons participating in the decision to issue that order;
- (c) State the first date on which such different warning was actually placed on said product;
- (d) State the first date on which such product accompanied by such different warning was sold, distributed or installed;
- (e) Describe, with specificity, any and all changes, modifications or differences between the different warning and the prior warnings(s);
- (f) Identify any and all persons who participated in any phase of the drafting or design of such different warning, including, but not limited to, those who performed the actual drafting and design work, those who reviewed the work, those who edited the work and those who approved the different warning;

- (g) State why you placed such different warning on said product, including, but not limited to, whether you placed such different warning on said product because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute; and
- (h) Identify any and all documents referring to, relating to or reflecting, said different warning, its drafting, and/or the decision to place the different warning on said product.

ANSWER: Crane Co. objections to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the forgoing objections, Crane Co. is not presently aware of any "warnings" other than the one identified in response to Interrogatory No. 63. See also objections and response to Interrogatory No. 68. See Preliminary Statement, Section B.

INTERROGATORY NO. 68:

Prior to the date on which Defendant first directed that a warning accompany any product identified in response to Interrogatory Nos. 19 and 42, did any person, firm, organization or other entity, within or without your employ, suggest, recommend, counsel, advise, or otherwise indicate in any manner, that a warning should accompany any or all such products or asbestos-containing products generally?

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the foregoing objections, on or about March 12, 1985, H. E.

Farley, a Crane Co. employee, authored a memorandum requesting comments on a "proposed asbestos Cautionary tag." Subsequently, on June 26, 1985, P. T. Maney, another Crane Co. employee, sent approximately 4,000 "warning" tags that read "CAUTION Contains Asbestos Packing or Gasket." See Preliminary Statement, Section B.

INTERROGATORY NO. 69:

If your answer to Interrogatory No. 68 is "Yes," with respect to each such suggestion, recommendation, counseling, advice or other indication:

- (a) Identify the person(s) and/or entity(ies) giving the same;
- (b) State the date(s) on which the same was given;
- (c) Identify any and all persons receiving notice of the same;
- (d) Describe what, if any, action Defendant took in response to or upon the same; and,
- (e) Identify any and all documents referring to, relating to or reflecting the same, or any action taken thereon or in response thereto.

ANSWER: See objections and response to Interrogatory No. 68.

INTERROGATORY NO. 70:

Did Defendant, any predecessor, or any related company ever place any warning directly upon any of the products listed in response to Interrogatory Nos. 19 and 42?

ANSWER: See objections and response to Interrogatory No. 63.

INTERROGATORY NO. 71:

If your answer to Interrogatory No. 70 is "Yes," identify each and every product upon which such a warning was placed and for each such product identified:

- (a) State, verbatim, each and every warning which ever appeared on said product;
- (b) State the size, color and location of each such warning and describe the manner in which it was placed upon the product;
- (c) State the dates on which each such warning first and last appeared in said product; and,
- (d) Identify any and all documents referring to, relating to or reflecting the placing of any warning directly upon said products, including, but not limited to, decisions not to place such a warning.

ANSWER: See objections and response to Interrogatory No. 71.

INTERROGATORY NO. 72:

Did any warning of any type concerning the products listed in response to Interrogatory Nos. 19 and 42 ever appear in any sales literature or other materials distributed or provided by Defendant, any predecessor or any related company, to the purchasers, consumers and/or users of such products?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any "warning" other than the one identified in response to Interrogatory No. 63. See Preliminary Statement, Section, B.

objections, Crane Co. is not presently aware of any particular "packaging" and/or "containers" that may have been associated with its products beyond the information contained in its response to Interrogatory No. 19 and the product catalogs that Crane Co. is willing to produce in this matter. See response to Interrogatory No. 65.

INTERROGATORY NO. 75:

State the year that Defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust, promulgated by the American Conference of Governmental Industrial Hygienists, and identify the specific person(s) receiving such advise, and any and all documents communicating such advise.

ANSWER: Crane Co. objects to this Interrogatory because it is unduly burdensome. Subject to and without waiving the foregoing objections, while Crane Co. is today aware of the applicable regulations governing asbestos exposure levels, Crane Co. has no present knowledge of the precise circumstances regarding how or when it first became aware of such limits.

INTERROGATORY NO. 76:

State whether such threshold limit values or maximum allowable concentrations referred to in Interrogatory No. 75 involved TOTAL dust or just asbestos dust?

ANSWER: Crane Co. objects to this Interrogatory because it is a matter for industrial hygienists to opine, not Crane Co.

INTERROGATORY NO. 77:

Describe, in detail, any and all tests, if any, conducted by Defendant, any predecessor or any related company, or anyone acting on behalf thereof, concerning the quantity, quality or threshold limit values of asbestos dust or particles to which applicators or consumers of asbestos-containing products were exposed while using any product identified in response to Interrogatory Nos. 19 and 42, including:

- (a) The product being used;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said test;
- (c) State the date(s) of said test;
- (d) Describe the methodology, results and conclusions of said test;
- (e) Identify any and all documents referring to, relating or reflecting said test or the results and conclusions thereof; and,
- (f) Identify any and all persons to whom any document referring to, relating to or reflecting the results or conclusions of said test was sent.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, other than the two internal dust counts referenced in the preceding interrogatory responses, Crane Co. is not aware of any studies that are even arguably responsive to this Interrogatory. See Preliminary Statement, Section B.

INTERROGATORY NO. 78:

Did Defendant, any predecessor or any related company, at any time, directly advise the owners or management employees of any worksite in which it sold or applied any product listed in response to Interrogatory Nos. 19 and 42, of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienist? If so, state the date or dates that you so advised each such owner or employees, the manner in which you advised such owner or employee and the name of each such owner or employee.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Subject to and without waiving the foregoing objections, no.

INTERROGATORY NO. 79:

State the date on which any official of Defendant or its predecessor(s) first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

- (a) Pleural disease;
- (b) Asbestosis;
- (c) Mesothelioma;
- (d) Lung cancer;
- (e) Any other forms of cancer.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory because it seeks expert opinions, Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Crane Co. further objects to the phrase "any other forms of cancer" as being vague and ambiguous. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety

of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's. With respect to "other forms of cancer," Crane Co. is not presently aware of any established link between those disease processes and asbestos.

INTERROGATORY NO. 80:

- With respect to each disease set forth in Interrogatory No. 79:
 - (a) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;

- (b) Identify any and all documents referring to, relating to or reflecting such knowledge, notice, information or understanding; and,
- (c) Describe what, if any, action said official, Defendant, any predecessor or any related company took in response to such knowledge, notice, information or understanding.

ANSWER: See objections and response to Interrogatory No. 79.

INTERROGATORY NO. 81:

Is Defendant aware, or does Defendant possess knowledge or information concerning, a causal connection between exposure to asbestos or asbestos-containing products and:

- (a) pleural disease?
- (b) asbestosis?
- (c) lung cancer?
- (d) mesothelioma?
- (e) other cancer?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory because it seeks expert opinions, Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Crane Co. further objects to the phrase "any other forms of cancer" as being vague and ambiguous. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge

may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas,

develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's. With respect "other forms of cancer", Crane Co. is not presently aware of any established link between those disease processes and asbestos.

INTERROGATORY NO. 82:

For each subpart of Interrogatory No. 81 to which you answered "Yes":

- (a) Describe when and how Defendant first obtained knowledge, or information concerning such connection;
- (b) If such knowledge or information was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting, any and all persons attending, and any and all documents referring to, relating to or reflecting the meeting;
- (c) If knowledge was obtained from medical or scientific studies, or work, published or unpublished, identify the same.

ANSWER: See objections and response to Interrogatory No. 81.

INTERROGATORY NO. 83:

With regard to any knowledge or information obtained subsequent to that identified in your answer to Interrogatory No. 82 (a), identify any and all documents or communications (oral and/or written) concerning the causal connection between exposure to asbestos-containing or asbestos products and any disease, which were

sent to, or received by, Defendant, and identify any and all persons conveying and/or receiving such communications.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Crane Co. further objects to this Interrogatory to the extent that it seeks to invade Crane Co.'s attorney work product. Subject to and without waiving the foregoing objections, Crane Co. is not aware of any information responsive to this Interrogatory outside of that information obtained in connection with the defense of asbestos litigation.

INTERROGATORY NO. 84:

As to any knowledge or information referred to in Interrogatories 79-83, did Defendant, at any time, educate or inform its employees, distributors, purchasers or any persons working in the vicinity where any asbestos-containing product was being applied or installed as to the hazards known to Defendant or about which Defendant had information, and as to the safety precautions necessary to guard against cancer and other diseases arising from the use and handling of the products identified in response to Interrogatory No. 19?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this

Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was hazardous when used as intended. As such, Crane Co. has no information responsive to this Interrogatory.

INTERROGATORY NO. 85:

If your answer to Interrogatory No. 84 is "Yes," identify each such occasion on which Defendant so educated or informed its employees, distributors or purchasers, as follows:

- (a) Identify the persons or parties which you educated or informed;
- (b) State when, where and in what manner they were educated or informed;
- (c) Identify any and all documents referring to, relating to or reflecting the communication or other dissemination of such information; and
- (d) Identify any and all persons who so educated or informed said employees, distributors, purchasers or persons working in the vicinity of application or who participated in the same in any way, including, but not limited to, assembling, drafting, writing, rewriting, preparing or conveying such information in any format.

ANSWER: See objections and response to Interrogatory No. 84.

INTERROGATORY NO. 86:

Did Defendant or any predecessor entity perform, direct to be performed, finance in whole or in part, sponsor in whole or in part or receive the results of, any studies or

tests concerning the relationship between asbestos exposure and asbestosis, cancer and/or mesothelioma?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, no.

INTERROGATORY NO. 87:

If your answer to Interrogatory No. 86 is "Yes," with respect to each such study or test:

- (a) State the nature of the involvement (performed, directed it to be performed, financed, sponsored, received results, etc.);
- (b) State when, where and at what intervals said study was performed;
- (c) Identify any and all persons, firms or entities which performed said study;
- (d) Identify any and all documents referring to, relating or reflecting said study or the results thereof; and
- (e) State all means by which the results of said study were disseminated including, if applicable, publication; and identify any and all persons who received said results and any and all publications in which said results appeared.

ANSWER: See objections and response to Interrogatory No. 86.

INTERROGATORY NO. 88:

Did Defendant at any time during the period that the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, sold, applied or installed, inform

any purchaser or user of said products that such products could cause cancer, asbestosis, and/or other serious diseases?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was hazardous when used as intended. As such, Crane Co. has no information that is responsive to this Interrogatory.

INTERROGATORY NO. 89:

Did Defendant, any predecessor or any related company, or any workers' compensation insurance carrier thereof, ever have any claims for lung diseases or death from lung disease, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or exposure to asbestos-containing products?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Crane Co. further objects to the

term "lung disease" as being vague and ambiguous. Crane Co. objects to this Interrogatory because there is no evidence that any plaintiff was a Crane Co. employee or ever present at a Crane Co. facility, and because Crane Co.'s past experience in the asbestos litigation is not relevant to this action.

INTERROGATORY NO. 90:

If your answer to original Interrogatory number 89 was yes, please provide the following information for each and every employee of the defendant, predecessor or related company with such a claim. If the claimant was a non-employee, please provide the information for the first 100 cases of which the defendant had notice.

- (a) Identify the claimant;
- (b) Identify the entity against which the claim was filed;
- (c) State the date upon which the claim was filed;
- (d) List the locations(s) at which claimant was exposed to asbestos;
- (e) Identify each and every board, administrative body, commission or court which handled or reviewed said claim and state the state the style and cause number applicable to said claim before each such body;
- (f) Identify the disease alleged by claimant;
- (g) State the final disposition of the claim including any and all benefits paid, and the entity making such payments;
- (h) If different from the date on which the claim was filed, state the date on which defendant first had notice of the claim; and
- (i) Identify any and all documents referring to, relating to or reflecting said claim.

ANSWER: See objections to Interrogatory No. 89.

INTERROGATORY NO. 91:

How many past or present employees of Defendant, its predecessors or related companies are known by you to be suffering from, to have suffered from, or to have suffered deaths caused by:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Crane Co. further objects to the term "suffering" as being vague and ambiguous. Crane Co. also objects to this Interrogatory because there is no evidence that any plaintiff was a Crane Co. employee or present at a Crane Co. facility.

INTERROGATORY NO. 92:

For each employee referenced in your answer to Interrogatory No. 91, state the date that Defendant first knew, or had notice or information, that such past or present employee was suffering, or had suffered from:

- (a) asbestosis;
- (b) lung cancer;
- (c) mesothelioma.

ANSWER: See objections to Interrogatory No. 92.

INTERROGATORY NO. 93:

Identify any and all material safety data sheets concerning the products listed in response to Interrogatory Nos. 19 and 42 prepared, at any time, by, or on behalf of, Defendant, any predecessor or any related company.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects because this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is not relevant to these actions. Subject to and without waiving the foregoing objections, Crane Co. is unaware of any MSDS's for its products identified in response to Interrogatory No. 19. See Preliminary Statement, §B.

INTERROGATORY NO. 94:

Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has

belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

ANSWER: Crane Co. objects to this Interrogatory because it is overbroad and unduly burdensome, is not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is not relevant to these actions. Subject to and without waiving the foregoing objections, to the extent relevant, to the best of its knowledge, Crane Co. was a member of the National Safety Council (approximately 1975-1996), the Valve Manufacturers Association (approximately 1938 to present). In addition, Crane Co. believes that it was a member of the American Petroleum Institute and Cast Iron Boiler Association at some point. **See** Preliminary Statement, §B.

INTERROGATORY NO. 95:

Identify any and all persons attending, on behalf of Defendant, any predecessor or any related company, any meetings, seminars or symposiums held by the trade organizations, associations, or other entities identified in response to Interrogatory No. 94.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and because it seeks information not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine the names of individual employees who may have attended meeting

responsive to this Interrogatory. To the best of Crane Co.'s present knowledge, William N. McLean, Crane Co.'s former Director of Engineering, served on various committees of the American Petroleum Institute. See Preliminary Statement, Section B.

INTERROGATORY NO 96:

Did any officer, employee, agent or representative of Defendant, of any predecessor, or of any related company, serve, at any time, as:

- (a) an officer, director or official of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (b) a member of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (c) the chair of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (d) the representative or liaison for any trade organization, association or entity identified in response to Interrogatory No. 94 to any other trade organization, association or entity, including, but not limited to, A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., N.A.C., N.S.C., A.C.S., N.B.M.D.A., N.I.A., S.M.F.M.A.?

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and because it seeks information not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine the names of individual employees who may have attended meeting responsive to this Interrogatory. To the best of Crane Co.'s present knowledge, William N. McLean, Crane Co.'s former Director of Engineering, served on

various committees of the American Petroleum Institute. See Preliminary Statement, Section B.

INTERROGATORY NO. 97:

For each subpart of Interrogatory No. 96 to which your answer is "Yes," identify each and every person serving in such capacity and:

- (a) state the trade organization, association or entity for which such service was rendered;
- (b) specify the capacity of service, including identifying any specific committee, subcommittee or other trade organizations, associations or entities involved; and,
- (c) state the applicable dates of service.

ANSWER: See objections and response to Interrogatory No. 96.

INTERROGATORY NO. 98:

Identify any and all documents which Defendant, its predecessor(s) or any related company submitted to, or received from, the organizations listed in response to Interrogatory Nos. 94 and/or 97:

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; and/or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence,

Subject to and with out waiving the foregoing objections, to the best of Crane Co.'s present knowledge, the Valve Manufacturer's Association provided Crane Co. with an article in 1987 that dealt with asbestos.

INTERROGATORY NO. 99:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, created by, or on behalf of, any trade organization, association or entity listed in response to Interrogatory No. 94 and/or 97 or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the foregoing objections, to the best of Crane Co.'s present knowledge, it is not aware of any documents responsive to this Interrogatory. See Preliminary Statement, Section B.

INTERROGATORY NO. 100:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, received by, or on behalf of, any trade organization, association or entity listed

in response to Interrogatory No. 94 and/or 97, or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER: Crane Co. objects to this Interrogatory as being duplicative.

See objections and response to Interrogatory No. 99.

INTERROGATORY NO. 101:

Identify any and all agreements, oral or written, between or among Defendant, any of the other defendants in this lawsuit, any organization, association or other entity including, but not limited to, those identified in your answer to Interrogatory No. 94 and/or any medical or scientific foundations, relating to the standardization of:

- (a) Specifications for asbestos cloth products;
- (b) Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos cement;
- (c) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (d) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public;
- (e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
- (f) Medical programs to be offered or sponsored by defendant.

ANSWER: Crane Co. objects to this Interrogatory as being overly broad and because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. is not aware of any agreements with respect to asbestos issues that are responsive to this Interrogatory. See Preliminary Statement, Section B.

INTERROGATORY NO. 102:

Did Defendant, any predecessor or related company, direct to be performed, sponsor in whole or in part, finance in whole or in part, receive the results of, or become aware of, any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human health?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 103:

If your answer to Interrogatory No. 102 is "Yes":

- (a) Identify any and all documents received by Defendant, its predecessor(s), or a related company referring to, relating to or reflecting any findings or results of those studies or tests, and state the date upon which each was first received;

- (b) Identify any and all communications (oral or written), between Defendant, its predecessor(s) or a related company and Saranac personnel, including but not limited to Gerrit W.H. Schepers, M.D.;
- (c) Identify any and all documents referring to, relating to or reflecting the Saranac studies received or submitted by Defendant, its predecessor(s) or a related company either directly, through related or predecessor companies, through other companies, or through any trade associations, organizations or other entities; and
- (d) Identify any and all documents referring to, relating to or reflecting recommendations or findings of such studies relating to:
 - (1) Adequacy or inadequacy of threshold limit values;
 - (2) Substitution of materials other than asbestos to be used in the insulation process.

ANSWER: See objections and response to Interrogatory No. 102.

INTERROGATORY NO. 104:

With respect to each subject listed below, state whether said subject was, at any time, discussed at a meeting of the board of directors of Defendant, any predecessor or any related company:

- (a) The sale and/or marketing of any asbestos-containing product, including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42;
- (b) The health hazards resulting from exposure to asbestos, including, but not limited to, exposure resulting from the use, application or removal of asbestos-containing products;
- (c) The placement or possible placement of warning labels on asbestos-containing products or their packages, or in sales literature, therefore including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42; and
- (d) Any test, survey, study or similar matter concerning asbestos or asbestos-containing products, including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it seeks to invade attorney client privilege and attorney work product. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any discussion specifically devoted to asbestos-issues, outside of discussions that may have been held regarding the defense of asbestos litigation. Crane Co.'s investigation into these matters is continuing and Crane Co. will supplement when more information becomes available.

INTERROGATORY NO. 105:

If your answer to any one or more of the subparts of Interrogatory No. 104 is "Yes," then with respect to each subpart for which you answered "Yes":

- (a) Identify each and every board meeting at which said subject was discussed by stating the date(s) on which, and the location(s) at which, each meeting was held;
- (b) Identify any and all persons present at each such meeting; and,
- (c) Identify any and all documents, including, but not limited to, minutes, referring to, relating to, or reflecting each such meeting.

ANSWER: See objections and response to Interrogatory No. 104.

INTERROGATORY NO. 106:

Identify any and all seminars, symposiums, conferences or like gatherings attended by any officer, agent or representative of Defendant, any predecessor or any

related company, at which the subject of asbestos, the health hazards of asbestos exposure, or the placement or providing of warnings was discussed.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and because it seeks information not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine the names of individual employees who may have attended meetings responsive to this Interrogatory. To the best of Crane Co.'s present knowledge, it is not aware of the names of any individuals who attended meetings of the type referenced in this Interrogatory. See Preliminary Statement, Section B.

INTERROGATORY NO. 107:

Identify any and all documents, including, but not limited to, notes, reports, minutes or bulletins, which refer to, relate to or reflect any meeting identified in response to Interrogatory No. 106.

ANSWER: See objections and response to Interrogatory No. 106.

INTERROGATORY NO. 108:

With respect to each job site within 200 miles of Madison County and/or identified by any plaintiff (who has asserted claims against this defendant) (i) identify any and all documents referring to, relating to or reflecting the purchase, sale, delivery, use, application or ordering, of any of the products listed in response to Interrogatory Nos. 19

and 42 by, for, to or at said site; and, (ii) identify any and all persons known by Defendant to have knowledge concerning the same:

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited in time or limited to plaintiff's job sites, and it requires Crane Co. to make an investigation to identify the job sites that are responsive to this inquiry. If plaintiffs are interested in a specific job site, please provide the same to Crane Co.

INTERROGATORY NO. 109:

Identify any and all parties, located within a 200 mile radius of Madison County, Illinois, including, but not limited to, distributors, suppliers or contractors, known by you to have purchased, received, sold, distributed, applied or otherwise used, at any time, any or all of the products listed in response to Interrogatory Nos. 19 and 42.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited in time or limited to plaintiff's job sites. If plaintiffs are interested in a specific party(ies), please provide the name to Crane Co.

INTERROGATORY NO. 110:

Other than cases identified in Interrogatory numbers 89 and 90, has defendant, any predecessor or any related company, ever appeared as a party in any lawsuit involving a claim or claims based upon allegations of property damage or seeking

recovery of the costs of abatement from the use, application, installation or presence of asbestos or asbestos-containing products?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, no.

INTERROGATORY NO. 111:

If your answer to Interrogatory No. 110 is "Yes," identify each such lawsuit as follows:

- (a) Identify the plaintiff(s);
- (b) Identify all other defendants;
- (c) State when and where the case was filed;
- (d) Identify each court in which the case was heard or is pending, including appeals, and state the style and cause number of the case in each court; and,
- (e) State the current status of the case if it remains pending or, if the case has been disposed of, state the final disposition.

ANSWER: See objections and response to Interrogatory No. 110.

INTERROGATORY NO. 112:

In any lawsuit, as described in Interrogatory numbers 89, 90, 110 and 111, has Defendant been subject to sanctions, a contempt citation or similar action for failing, or refusing to comply with, any court order, for discovery fraud; or for the failure to provide complete, accurate and truthful responses to discovery?

ANSWER: See objections to Interrogatories Nos. 89, 90, 110, 111.

Subject to and without waiving any objections, Crane Co. has not been sanctioned or cited for inappropriate conduct in connection with the asbestos litigation.

INTERROGATORY NO. 113:

If your answer to Interrogatory No. 112 is "Yes," with respect to each such occasion described:

- (a) Identify the lawsuit involved, the court which imposed the sanctions or issued the contempt citation, and any other court which reviewed the same;
- (b) Describe the violation for which sanctions or contempt was imposed;
- (c) If the violation involved the failure or refusal to produce any document(s), identify any and all such documents;
- (d) If the violation involved any failure to truthfully answer or to respond to interrogatories, identify any and all such interrogatories and your response thereto, including the person answering on your behalf;
- (e) State the present status or final disposition of the matter, which ever is applicable; and,
- (f) Identify any and all documents referring to, relating to or reflecting said matter, including, but not limited to, pleadings, exhibits and court orders.

ANSWER: See response to Interrogatory No. 112.

INTERROGATORY NO. 114:

In any lawsuit involving a claim or claims based upon allegations of injury, impairment, disease or death allegedly caused by exposure to asbestos, has any document or conversation as to which the defendant, any predecessor or related

company, asserted the attorney/client privilege been held by any court to be not privileged on the basis of the crime/fraud exception?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, no.

INTERROGATORY NO. 115:

If your answer to Interrogatory No. 114 is "Yes," identify any and all such documents or conversations described, and with respect to each:

- (a) Identify all persons whose actions were held to constitute a crime or fraud;
- (b) State the current status of the court's determination; and,
- (c) State whether you assert the privilege with respect to disclosing the document or conversation in this case.

ANSWER: See objections and response to Interrogatory No. 114.

INTERROGATORY NO. 116:

Identify any and all expert witnesses who have testified on behalf of the defendant, any predecessor or related company, in the last ten years in any lawsuits involving a claim or claims based upon allegations of injury, impairment, disease or death caused by exposure to asbestos, or a claim or claims based upon allegations of property damage from the use, application, installation or presence of asbestos or asbestos-containing products, or issues of insurance coverage for any claims of

personal injury or property damage arising out of the exposure to, use of, application of, installation of, or presence of asbestos or asbestos-containing products.

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 117:

Identify any and all present or former directors, officers, employees, or agents of defendant, any predecessor or related company, who have testified in any manner whatsoever including a discovery or evidence deposition, or in a trial, in the last 20 years on behalf of or against the defendant, any predecessor, or related company, in any lawsuits involving a claim or claims based upon allegations of personal injury or property damage caused by exposure to, the use of, the application of, the installation of, or the presence of any asbestos or asbestos-containing product, other than persons who testified as plaintiffs in their own cases. Specifically included within the scope of this request are any suits involving the issue of insurance coverage for claims of personal injury or property damage resulting from the exposure to, the use, application, installation or presence of asbestos or asbestos-containing products.

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 118:

Identify any and all present or former directors, officers, employees, or agents of the defendant, any predecessor or any related company, other than persons appearing as adverse parties, who have testified against the defendant, any predecessor, or any

related company in the last 20 years, in any proceeding involving the subject of asbestos, including, but not limited to, workers' compensation hearings, or any hearing before any governmental body.

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 119:

With respect to your answers to Interrogatory numbers 116, 117, and 118, identify any and all documents, including, but not limited to, transcripts or notes of testimony, referring to, relating to or reflecting the testimony of such expert witnesses or employees, directors, officers, or agents.

ANSWER: This Interrogatory was stricken by this Court's April 14, 2000 order.

INTERROGATORY NO. 120:

Has Defendant, any predecessor or any related company, ever been cited, warned, fined, sanctioned or otherwise officially written up for, any violation of a federal, state or local statute, law, rule, ordinance, code, administrative order, executive order, or the like, by any federal, state or local governmental entity, which violation concerned asbestos in any way?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving

the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 121:

If your answer to Interrogatory No. 120 is "Yes," with respect to each such violation:

- (a) Identify the governmental entity issuing the citation, warning, fine, sanction or write-up;
- (b) State the date of the citation, warning, fine, sanction or write-up;
- (c) Describe the violation and state the date(s) during which it occurred;
- (d) Identify the statute, law, rule, ordinance, code or order to which the violation related;
- (e) State what, if any, specific fine, penalty, or sanction was imposed;
- (f) State the date in which and the manner in which said violation was corrected;
- (g) Identify any and all officials of Defendant, its predecessor or its related company having knowledge or notice of said violation and state the date on which said knowledge or notice was received; and,
- (h) Identify any and all documents referring to, relating to or reflecting said violation.

(This interrogatory is limited to the time period 1930 to 1980 and subpart (a) was stricken per this court's April 14, 2000 order.)

ANSWER: See objections and response to Interrogatory No. 120.

INTERROGATORY NO. 122:

Has any federal, state or local government entity, at any time, conducted any inspection, test or survey concerning asbestos or asbestos exposure at any facility

where the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, processed, applied, used or removed?

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited to locations where the plaintiffs worked. Crane Co. further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 123:

If your answer to Interrogatory No. 122 is "Yes," then with respect to each such inspection, test or survey:

- (a) Identify the governmental entity conducting the same;
- (b) State the date(s) on which the same was conducted;
- (c) Describe the nature of the inspection, test or survey including, but not limited to, the results or conclusions thereof; and,
- (d) Identify any and all documents referring to, relating to or reflecting the same.

ANSWER: See objections and response to Interrogatory No. 122.

INTERROGATORY NO. 124:

Identify:

- (a) Any expert whom you intend to call as a witness;
- (b) The subject matter on which the expert is expected to testify;

- (c) The substance of the facts and opinions to which the expert is expected to testify;
- (d) A summary of the grounds for each opinion;
- (e) The address of such person and field of expertise;
- (f) Identify and produce each treatise, article or text upon which the expert will rely in testifying.

ANSWER: Crane Co. objects to this Interrogatory because Plaintiffs have failed to offer any evidence that would prove or tend to prove that the plaintiffs/decedents had been exposed to any asbestos-containing products manufactured, sold or distributed by Crane Co. Accordingly, Crane Co. is aware of no expert witnesses which would be necessary to Crane Co.'s defense of this case or which Crane Co. anticipates offering at any trial of this case.

At such time, if any, that the plaintiffs offer evidence of the plaintiffs'/decedents' exposure to any asbestos-containing product manufactured, sold or distributed by Crane Co., Crane Co. will forthwith determine whether any experts will be required and will supplement this expert witness disclosure since at the present time it is impossible to determine which witnesses might have relevant information. Subject to and without waiving the foregoing, Crane Co. incorporates its Master Expert Witness Disclosure List of Crane Co. for All Asbestos Litigation as if fully set forth herein.

INTERROGATORY NO. 125:

Are there any policies of insurance which provide, or might provide, coverage on behalf of Defendant, any predecessor or any related company for the injuries alleged in Plaintiffs' complaints?

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. is liable on any of the claims made by plaintiffs herein. Subject to and without waiving the foregoing objections, the following chart identifies the confirmed primary insurance coverage available to Crane Co. Additional primary coverage may be available for prior years, but is subject to dispute by certain carriers:

Carriers	Policy Number	Term	Limits
Globe Indemnity	GLC 011930	1/1/60-1/1/61	1 M OCC/2M AGG
Globe Indemnity	GLC 011931	1/1/61-1/1/62	1M OCC/2M AGG
CCC	CL 4293679R	7/1/61-7/1/64	1M OCC/2M AGG PER YEAR
Liberty Mutual	LG1621004017028	2/1/68-2/1/69	1M OCC/2M AGG
Liberty Mutual	LG1621004017029	2/1/69-2/1/70	1M OCC/2M AGG
Liberty Mutual	LG1621004017020	2/1/70-2/28/71	1M OCC/2M AGG
Hartford	10 CA 46800	2/28/71-7/1/72	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/72-7/1/73	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/73-7/1/74	1M OCC/1M AGG
Aetna	01AL260803SCA	7/1/76-7/1/77	1M OCC/1M AGG
Aetna	01AL260851SCA	7/1/77-7/1/78	1M OCC/2M AGG
Aetna	01GL8SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01AL265932SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01GL1475SCA	7/1/79-7/1/80	1M OCC/2M AGG
Aetna	01AL265996SCA	7/1/79-7/1/80	1M OCC/2M AGG
Continental	SRL3636025	7/1/80-7/1/81	1M OCC/2M AGG
Continental	SRL3636199	7/1/81-7/1/82	1M OCC/2M AGG
INA	CFG209262	7/1/82-7/1/83	1M OCC/2M AGG
INA	CFG209868	7/1/83-7/1/84	1M OCC/2M AGG
INA	CFG3141403	7/1/84-7/1/85	1M OCC/2M AGG
INA	CFG G07749673	7/1/85-7/1/86	1M OCC/3M AGG

INTERROGATORY NO. 126:

If your answer to Interrogatory No. 125 is "Yes," identify each such policy of insurance as follows:

- (a) Identify the insurer(s);
- (b) Identify the insured(s);
- (c) State the date on which the policy was first purchased and the date on which the policy expired or was terminated;
- (d) Describe the coverage provided, including, but not limited to, the time period over which the policy applied, the nature of the acts, omissions and injuries covered, and whether the policy provides primary or excess coverage; and
- (e) State the dollar limits of the coverage provided, including, if applicable, the "per person" limitations and "per occurrence" limitation.

ANSWER: See objections and response to Interrogatory No. 125.

INTERROGATORY NO. 127:

With respect to each policy described in response to Interrogatory No. 126, state:

- (a) the dollar amount of coverage which remains unexpended; and
- (b) whether any dispute exists between insurer and insured with respect to coverage.

ANSWER: Crane Co. objects to this Interrogatory because the availability of coverage or the amount of coverage remaining is not in any way relevant to these actions, and it is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 128:

Other than the policies of insurance described in response to Interrogatory No. 126, do there exist any agreements providing for the benefit of Defendant, any predecessor or any related company, complete or partial indemnification for any or all expenses incurred with respect to any or all of these cases, including, but not limited to, judgments, settlements, costs, experts' fees and/or attorneys' fees?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to the use of the phrase "these cases" as being ambiguous. Subject to and without waiving the foregoing objections, Crane co. is not presently receiving indemnification from anyone other than its insurers in connection with the Madison County asbestos litigation.

INTERROGATORY NO. 129:

If your answer to Interrogatory No. 128 is "Yes," for each such agreement:

- (a) Identify all parties to the agreement and state the capacity of each such party (i.e. indemnitor, indemnitee, etc.);
- (b) State the terms of the agreement, including the nature of the expenses covered and, if applicable, any limitations on payment, reimbursement or indemnification; and
- (c) Identify any and all documents referring to, relating to or reflecting said agreement.

ANSWER: See objections and response to Interrogatory No. 128.

INTERROGATORY NO. 130:

Was this Defendant ever allowed to use the trademark or logo of any other company, including but not limited to, its predecessor or related company, on any products Defendant sold, distributed or installed, and if so please state:

- (a) The trademark or logo used by you;
- (b) The company allowing such use of its trademark or logo;
- (c) The time period such use was allowed;
- (d) Whether such use was by written, verbal or implied agreement;
- (e) Each and every product such trademark or logo was placed upon;
- (f) Identify all documents which refer to, relate to or reflect the use of such trademark or logo.

ANSWER: Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Over time, Crane Co. has owned various businesses and taken over various provider lines. These matters are addressed in its responses to Interrogatory No. 19.

INTERROGATORY NO. 131:

From 1940 to present, state whether Defendant and/or any predecessor or related company ever provided workers' compensation, health, accident and disability and/or life insurance coverage for its employees, and if so:

- (a) Identify each insurance carrier which provided workers' compensation, health, accident and disability and/or life insurance coverage to your

employees and the dates such coverage was provided by each such carrier;

- (b) State whether such insurance carrier(s) ever conducted any dust counts or studies, industrial hygiene surveys or other tests relating to any asbestos-containing products that Defendant's employees may have been working with or around; and,
- (c) If your response to subpart (b) hereof is in the affirmative, please indicate the date of each such count, study, survey or other test and identify all documents relating thereto.

(This interrogatory is limited to the time period 1930 to 1980 and subpart (a) was stricken per this court's April 14, 2000 order.)

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER 132:

Other than cases identified in Interrogatories 89, 90, 110 and 111, has defendant, any predecessor or any related company, ever appeared as a party in any lawsuit involving a claim or claims based upon issues of insurance for any claim of personal injury, property damage or cost of abatement arising out of the exposure to, use of, application of, installation of or presence of asbestos or asbestos-containing products?

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, Crane Co.

has never been involved in any lawsuit with an insurer that involved asbestos issues.

INTERROGATORY NUMBER 133:

If your answer to Interrogatories 89, 90, 110 and 111 is "yes", identify each such lawsuit as follows:

- (a) Identify all plaintiff(s);
- (b) Identify all defendant(s);
- (c) State when and where the case was filed;
- (d) Identify each court in which the case was heard or is pending, including appeals, and state the style and cause number of the case in each court; and
- (e) State the current status of the case if it remains pending or, if the case has been disposed of, state the final disposition.

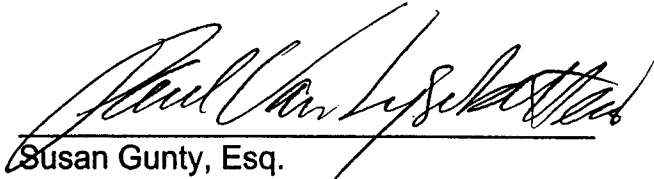
ANSWER: See objections and responses to Interrogatories 89, 90, 110 and 111.

INTERROGATORY NUMBER 134:

Is the defendant, any predecessor or related company, claiming any document responsive to any interrogatory or any request for production filed by The Simmons Firm as being protected from disclosure because of a privilege claimed for any reason? If yes, please list each document being claimed as protected from disclosure in a privilege log providing the date of the document, the identity of the author, what individual or entity the document was addressed to, the identity of any individuals or entities provided

copies of the document, a brief description of the nature of the document, and the particular privilege claimed as shielding the document from disclosure.

ANSWER: Crane Co. objects to this Interrogatory as being overly broad. Claims of privilege permeate these broad requests, which basically asks for the results of investigations conducted by counsel. Accordingly, Plaintiff need to be more specific in this request.

A handwritten signature in cursive script, appearing to read "Paul Van Lysebettens", is written over a horizontal line.

Susan Gunty, Esq.
Paul Van Lysebettens, Esq.
Gunty & McCarthy
150 South Wacker Drive, Suite 1025
Chicago, IL 60606

CERTIFICATE OF SERVICE

I hereby certify that Responses to Plaintiffs' Interrogatories Directed to Defendant, Defendant Crane Company were sent via e-mail and signature pages via facsimile with hard copies mailed to counsel of record via U.S. Mail, postage prepaid, this 20th day of January 2003.

**William Kohlburn
The Simmons Firm, L.L.C.
301 Evans Avenue
PO Box 559
Wood River, IL 62095**

A handwritten signature in cursive script, appearing to read "Paul Van Dyke & Associates", is written over a horizontal line.

DEFENDANT'S AFFIDAVIT

STATE OF CONNECTICUT)

COUNTY OF)

The undersigned, being duly sworn under oath states that he is a representative of Defendant Crane Co., he is authorized to provide the foregoing Responses to Plaintiffs' Interrogatories Directed to Defendant Crane Company, and the answers given are true and accurate to the best of his knowledge, information, belief, and as he is informed by others based upon a review of existing business records and interviews of former employees of the company.



Anthony D. Pantaleoni

On this 17th day of January, 2003, Anthony D. Pantaleoni, to me known, appeared before the undersigned and swore to the above statement.



Notary Public

My Commission expires:

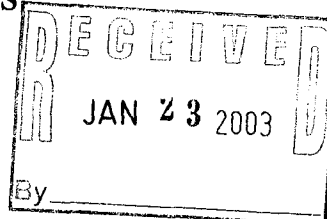
LENORA ROWSER

NOTARY PUBLIC

MY COMMISSION EXPIRES DEC. 31. 2004

IN THE CIRCUIT COURT
FOR THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION)
FILED IN MADISON COUNTY)
CIRCUIT COURT)



CERTIFICATE OF SERVICE

I, Paul Van Lysebettens, being first duly sworn on oath, depose and state that a copy of **Defendant, Crane Co.'s Answers to Interrogatories**, are hereby being served upon plaintiffs' attorneys listed on the attached Service List by enclosing a copy of the same in an envelope, sealed, postage prepaid and deposited in the U.S. Mail Chute at 150 South Wacker Drive, Chicago, IL 60606 at 5:00 p.m. on this 21th day of January, 2003. **Copies will be sent to defendants on the attached Service List upon request.**

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A handwritten signature in cursive script, appearing to read "Paul Van Lysebettens", written over a horizontal line.

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