

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ROSE MARIE KUPFER, Individually
and as Administratrix of the Estate
of WILLIAM J. KUPFER, Deceased,

Plaintiff,

vs.

THE DOW CHEMICAL COMPANY;
PPG INDUSTRIES, INC.; and
SHELL CHEMICAL COMPANY, a
division of Shell Oil Company,

Defendants.

Civil Action No.
92-CV-0594S

SHELL OIL COMPANY,

Defendant and
Third-Party Plaintiff,

vs.

THE GOODYEAR TIRE & RUBBER COMPANY,

Third-Party Defendant.

RESPONSE OF DEFENDANT PPG INDUSTRIES, INC.
TO PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil
Procedure, defendant PPG Industries, Inc. ("PPG") responds and
objects to plaintiff's first request for production of documents
upon information and belief as follows:

GENERAL OBJECTIONS AND LIMITATIONS

1. PPG objects to the "Definitions and Instructions" set forth by plaintiff to the extent that they seek to alter the obligations placed on PPG by the Federal Rules of Civil Procedure, applicable law, or the rules of court.

2. PPG objects to providing information relating to "Defendant's predecessor" or "Defendant's subsidiary companies" as being overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Responses will be provided for PPG only and will be based upon information known and available to PPG.

3. PPG objects to any demands to the extent that they seek privileged communications or attorney work product which is protected from disclosure.

4. PPG objects to any demands to the extent that they seek confidential, financial, trade secret, or commercially sensitive business information.

5. PPG objects to any demands to the extent that they seek information already known to plaintiff, or to the extent that they are related to or require the production or identification of documents, writings, records, or publications in the public domain since such information is equally available to the plaintiff.

6. PPG objects to plaintiff's demands as overly broad and unduly burdensome insofar as they seek information from 1955

through 1978. PPG's sales records indicate sales of Vinyl Chloride Monomer ("VCM") to plaintiff's decedent's place of employment, The Goodyear Tire & Rubber Company ("Goodyear") in Niagara Falls, New York, in 1978, but PPG is unaware of any documents indicating VCM sales to Goodyear in years prior to 1978.

7. In providing the following responses to plaintiff's demands, PPG has undertaken a reasonable effort to locate records and to provide the information requested. The following responses are based upon such information as is reasonably available to PPG and susceptible to retrieval through reasonable efforts.

RESPONSE TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

1. All written reports, notes, written statements, and written memoranda of any kind relating to any investigation conducted by defendant, its agents, representatives or employees into the plaintiff's claim against the defendant, including any documents received from The Goodyear Tire & Rubber Company, or its attorneys.

RESPONSE: PPG objects to Request No. 1 for the reasons set forth in Paragraph 3 of defendant's General Objections. Other than discovery conducted in connection with this action, the only investigation conducted by PPG has been done by, or at the direction of, PPG's attorneys subsequent to service of the summons and complaint. Accordingly, PPG objects to this request because it seeks documents protected by the attorney work product and material prepared for litigation doctrines.

2. Produce all documents identified in response to plaintiff's interrogatory number 3.

RESPONSE: PPG objects to Request No. 2 for the reasons set forth in Paragraphs 2 and 6 of defendant's General Objections. Also, PPG incorporates by reference its objections set forth in its responses to Interrogatory Nos. 2 and 3. Subject to and without waiving the foregoing objections, see documents produced.

3. Produce all documents identified in response to plaintiff's interrogatory number 5.

RESPONSE: PPG objects to Request No. 3 for the reasons set forth in Paragraphs 2 and 6 of defendant's General Objections. Also, PPG incorporates by reference its objections stated in its responses to Interrogatory Nos. 4 and 5. Subject to and without waiving the foregoing objections, see documents produced.

4. Produce all documents identified in response to plaintiff's interrogatory number 7.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory Nos. 6 and 7. Subject to and without waiving the foregoing objections, and limiting this response to the year 1978, see documents produced.

5. Produce all documents identified in response to plaintiff's interrogatory number 8.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its response to Interrogatory No. 8. Subject to and without waiving the foregoing objections, and limiting this response to the year 1978, see documents produced.

6. Produce all documents identified in response to plaintiff's interrogatory number 10.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory Nos. 9 and 10. Subject to and without waiving the foregoing objections, and limiting this response to the year 1978, see documents produced.

7. Produce all documents identified in response to plaintiff's interrogatory number 12.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its response to Interrogatory No. 11. Please refer to PPG's responses to Interrogatory Nos. 11 and 12.

8. Produce all documents identified in response to plaintiff's interrogatory number 16.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory Nos. 15 and 16. Please refer to PPG's responses to Interrogatory Nos. 15 and 16.

9. Produce all documents identified in response to plaintiff's interrogatory number 22.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its response to Interrogatory No. 21. Please refer to PPG's responses to Interrogatory Nos. 21 and 22.

10. Produce all documents identified in response to plaintiff's interrogatory number 23.

RESPONSE: PPG objects to Request No. 10 and incorporates by reference its response to Interrogatory No. 23.

11. Produce all documents identified in response to plaintiff's interrogatory number 25.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory Nos. 24 and 25. PPG further objects to this request on the grounds that the documents sought are irrelevant to the issues in this suit and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see PPG's responses to Interrogatory Nos. 24 and 25 and documents produced.

12. Produce all documents identified in response to plaintiff's interrogatory number 28.

RESPONSE: PPG incorporates by reference its General Objections. Also, please refer to PPG's responses and objections to Interrogatory Nos. 27 and 28 and Request No. 1 above.

13. Produce all documents identified in response to plaintiff's interrogatory number 32.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory No. 31. Subject to and without waiving the foregoing objections, please refer to PPG's responses to Interrogatory Nos. 31 and 32.

14. Produce all documents identified in response to plaintiff's interrogatory number 34.

RESPONSE: PPG incorporates by reference its General Objections. Subject to and without waiving the foregoing objections, please refer to PPG's responses to Interrogatory Nos. 33 and 34.

15. Produce all documents identified in response to plaintiff's interrogatory number 36.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its responses to Interrogatory Nos. 35 and 36.

16. Produce all documents identified in response to plaintiff's interrogatory number 37.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its response to Interrogatory No. 37. Subject to and without waiving the foregoing objections, see PPG's response to Interrogatory No. 37.

17. Produce all documents identified in response to plaintiff's interrogatory number 38.

RESPONSE: PPG incorporates by reference its General Objections and the objections set forth in its response to Interrogatory No. 38. Subject to and without waiving the foregoing objections, see PPG's response to Interrogatory No. 38.

18. Produce all documents identified in response to plaintiff's interrogatory number 45.

RESPONSE: PPG incorporates by reference its General Objections and the objections set forth in its response to Interrogatory Nos. 44 and 45. PPG further objects to the extent this request, by inference, suggests that PPG had a duty to warn Goodyear, because there is no foundation for such an inference. Subject to and without waiving the foregoing objections, and limiting this response to the year 1978, see documents produced.

19. Produce all documents identified in response to plaintiff's interrogatory number 49.

RESPONSE: PPG incorporates by reference its General Objections and the objections set forth in its responses to Interrogatory Nos. 48 and 49. Subject to and without waiving the foregoing objections, see PPG's responses to Interrogatory Nos. 48 and 49.

20. Produce all documents identified in response to plaintiff's interrogatory number 50.

RESPONSE: PPG incorporates by reference its General Objections and its objections stated in its response to Interrogatory No. 50.

21. All written memoranda, specifications or other written material of any kind relating to the design and preparation of labelling, warnings, material safety data sheets, and instructions for use of Defendant's, Defendant's predecessor's, or Defendant's subsidiary companies' vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 21 as vague, overly broad and unduly burdensome in failing to specify a time period. PPG also objects to Request No. 21 to the extent it requests documents relating to time periods for which PPG has no record of sales of VCM to Goodyear's Niagara Falls plant. Moreover, the information sought by Request No. 21 is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Finally, labelling standards applicable to the relevant time frame are publicly available and are easily accessible to plaintiff. Subject to and without waiving the foregoing objections, PPG has produced documents relating to 1978 responsive to Request No. 21.

22. All written memoranda, specifications or other written material relating to the testing of vinyl chloride for potential health hazards.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 22 as overly broad, irrelevant and unduly burdensome in failing to specify a time period and in requesting documents for time periods for which PPG has no record of sales to Goodyear's Niagara Falls

plant. Furthermore, the information sought in this request is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving the foregoing objections, for the period 1978, PPG has no documents responsive to this request. Please also refer to PPG's response to Interrogatory No. 11.

23. All written memoranda, specifications, recommendations, publications, reports, scientific literature, medical literature or other written material relating to the potential health hazards of vinyl chloride, including, but not limited to, experimental animal studies, case reports, or epidemiological studies.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 23 on the grounds that it is overly broad, unduly burdensome, unlimited in time, and is vague and ambiguous. Furthermore, the information sought in this request is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving the foregoing objections, see PPG's response to Request No. 22.

24. All brochures, pamphlets, packaging, labelling, instructions, material safety data sheets or other written materials that contain any warnings, warranties, cautions, caveats, or directions concerning the possibility of injury from the use of vinyl chloride that have ever been issued by Defendant, Defendant's predecessor, or Defendant's subsidiary companies.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 24 as overly

broad, irrelevant and unduly burdensome in failing to specify a time period and in requesting documents for time periods for which PPG has no record of sales to Goodyear's Niagara Falls plant. Subject to and without waiving the foregoing objections, PPG has produced documents responsive to Request No. 24 for the 1978 time period.

25. Any written statements, reports, memoranda, or transcripts of oral statements that were allegedly made by any individuals who have knowledge of relevant facts about this case.

RESPONSE: PPG incorporates by reference its General Objections. Further, PPG objects to this request on the grounds that it is vague, overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, PPG has no such documents.

26. Any written reports of field testing for potential exposure to vinyl chloride where vinyl chloride was being used.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 26 as vague, overly broad and unduly burdensome in failing to specify a time period and in failing to define the phrase "field testing for potential exposure." Moreover, the information sought in this request is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving these objections, PPG has no documents responsive to Request No. 26 for the 1978 time period. Please also refer to PPG's response to Interrogatory No. 21.

27. Any written reports of studies undertaken to determine the nature and extent of any adverse effects on human health from exposure to vinyl chloride, including, but not limited to, any studies conducted or sponsored by Defendant, Defendant's predecessor, or Defendant's subsidiary companies to determine any incidence of cancer.

RESPONSE: See response and objections to Request No. 22.

28. Any written reports of studies conducted at the Goodyear Tire & Rubber Company to determine potential exposure to vinyl chloride.

RESPONSE: See response and objections to Request No. 22.

29. Any written reports of studies conducted at the Goodyear Tire & Rubber Company to determine any incidence of liver cancer.

RESPONSE: See response and objections to Request No. 22.

30. Any written reports or records relating to any case of liver cancer or angiosarcoma of the liver among past or present employees of Defendant, Defendant's predecessor, or Defendant's subsidiary companies where vinyl chloride was manufactured, used, or otherwise handled.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 30 as overly broad and unduly burdensome in failing to specify a time period. Moreover, PPG objects to Request No. 30 as irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Finally, to the extent plaintiff seeks medical records of PPG employees, PPG objects to production of such documents because they are privileged.

31. Any workers compensation claims for liver cancer or angiosarcoma of the liver made by or on behalf of past or present employees of Defendant, Defendant's predecessor, or Defendant's subsidiary companies where vinyl chloride was manufactured, used, or otherwise handled.

RESPONSE: See response and objections to Request No. 30.

32. Any written reports or correspondence with the National Institute for Occupational Safety and Health (NIOSH) concerning exposure to vinyl chloride or incidence of liver cancer or angiosarcoma of the liver.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome, irrelevant and a reasonable time frame has not been established. Subject to and without waiving the foregoing objections, the information sought, to the extent it exists, is as easily accessible to plaintiff as it is to this defendant through publicly available records. Please also refer to PPG's response and objections to Request No. 22.

33. Any written reports or correspondence with the Occupational Safety and Health Administration (OSHA) concerning exposure to vinyl chloride or incidence of liver cancer or angiosarcoma of the liver.

RESPONSE: See response and objections to Request No. 32.

34. Any written reports of, correspondence with, or citations from the Occupational Safety and Health Administration (OSHA) concerning any investigation into exposure to vinyl chloride or incidence of liver cancer or angiosarcoma of the liver at any facilities of Defendant, Defendant's predecessor, or

Defendant's subsidiary companies where vinyl chloride has been manufactured, used or otherwise handled.

RESPONSE: See response and objections to Request No. 32.

35. Any sales material used for the purposes of marketing or advertising vinyl chloride.

RESPONSE: See responses and objections to Request Nos. 4, 5, 18, 21 and 24 and documents produced.

36. Any written materials concerning the manner in which vinyl chloride should be used.

RESPONSE: See responses and objections to Request Nos. 4, 5, 18, 21 and 24 and documents produced.

37. Any written reports or other written materials regarding any recommendations and/or suggestions concerning the risks or hazards to persons involved in the manufacture or use of vinyl chloride by any physicians, medical officers, toxicologists, epidemiologists, industrial hygienists, medical consultants, or other scientists or researchers employed by Defendant, Defendant's predecessor, or Defendant's subsidiary companies.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that is overly broad and unduly burdensome, unlimited in time, vague and ambiguous as written, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving the foregoing objections, see PPG's responses to Request No. 22 and Interrogatory No. 24.

38. Any minutes of meetings, any correspondence between members of any trade organization or association, or any correspondence between Defendant, Defendant's predecessor, or Defendant's subsidiary companies and any other manufacturers of vinyl chloride regarding the potential hazards of exposure to vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad and unduly burdensome, unlimited in time, vague and ambiguous as written, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see PPG's responses to Request No. 22 and Interrogatory Nos. 48 and 49.

39. Any written testimony or submissions by Defendant, Defendant's predecessor, or Defendant's subsidiary companies to any court of law, hearing officer, local, state or federal government where the potential danger to human health from exposure to vinyl chloride was an issue.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome, unlimited in time, harassing, vague and ambiguous as written, irrelevant to the issues in this action and not reasonable calculated to lead to the discovery of admissible evidence. Furthermore, the information sought by Request No. 39, to the extent it exists, is as easily accessible to plaintiff as it is to this defendant through publicly available records. Please refer to PPG's response to Interrogatory No. 35.

40. Any written testimony, submissions or correspondence by Defendant, Defendant's predecessor, or Defendant's subsidiary companies to the Occupational Safety and Health Administration (OSHA) or the National Institute for Occupational Safety and Health (NIOSH) concerning any rulemaking or standard setting where occupational exposure to vinyl chloride was an issue.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad and unduly burdensome, unlimited in time, vague and ambiguous as written, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Please refer to PPG's responses and objections to Request Nos. 30, 32, 33, 34 and 39 and PPG's response to Interrogatory No. 35.

41. Any testimony by Defendant, Defendant's predecessor, or Defendant's subsidiary companies to any court of law, or in a deposition, where a claim for injury due to exposure to vinyl chloride had been made.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome, unlimited in time, vague and ambiguous as written, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Please refer to PPG's response and objections to Interrogatory No. 35.

42. All invoices, bills of sale, or other documents which set forth the sale, shipment or distribution by Defendant, Defendant's predecessor, or Defendant's subsidiary companies of vinyl chloride to The Goodyear Tire & Rubber Company in Niagara Falls, New York during the period of 1955 through 1978.

RESPONSE: See response and objections to Request Nos. 2 and 3 and documents produced.

43. Any written reports from or correspondence with any proposed expert witness.

RESPONSE: PPG has not yet identified its expert witness(es). PPG objects to Request No. 43 for the reasons set forth in Paragraph 3 of defendant's General Objections and its response to Interrogatory No. 38.

44. The latest curriculum vitae of any proposed expert witness.

RESPONSE: See response and objections to Request No. 43.

45. Any insurance policies pertaining to your coverage for this claim.

RESPONSE: PPG objects to Request No. 45 and incorporates by reference its responses to Interrogatory Nos. 42 and 43.

46. Any correspondence, or documents that refer or relate to communications, either oral or written, between Defendant, Defendant's predecessor, or Defendant's subsidiary companies and The Goodyear Tire & Rubber Company concerning any potential health hazards of exposure to vinyl chloride, including, but not limited to, labels, material safety data sheets, instructions for use, or reports of adverse health effects.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome and not limited to a

reasonable time frame. Please refer to PPG's responses and objections to Interrogatory No. 8 and Request No. 5.

47. All labelling or other similar documents for any containers of vinyl chloride, including tank cars.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad and unduly burdensome, unlimited in time, vague and ambiguous in that the phrase "similar documents" is not defined, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to and without waiving the foregoing objections, please refer to PPG's responses to Interrogatory Nos. 7 and 8 and PPG's responses to Request Nos. 4, 5, 18, 21 and 24 and the documents produced.

48. Any work rules, safety rules, work practices or other documents, including, but not limited to, any documents setting forth your personal protective equipment program regarding respirators, protective clothing, or other protective equipment, pertaining to your employees who produce or handle vinyl chloride or who are often exposed to vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome and not limited to a reasonable time frame. Furthermore, PPG objects to this request on the grounds that the information relating to employees of PPG is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of admissible evidence. Please refer to PPG's response to Request No. 21.

49. All industry standards concerning the manufacture, production, distribution, use and labelling of vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to Request No. 49 as vague, overly broad and unduly burdensome in failing to define the phrase "industry standards," in failing to specify a relevant time period, and in requesting information for years in which PPG has no record of sales of VCM to Goodyear's Niagara Falls plant. Moreover, the information sought is as easily accessible to plaintiff as it is to this defendant through publicly available records. Subject to and without waiving the foregoing objections, PPG has produced documents responsive to Request No. 49 for the 1978 period.

50. The latest annual report to the stockholders of your company.

RESPONSE: PPG objects to this request on the grounds that it is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence.

51. All documents which set forth any physical complaints, injuries, diseases, or other symptoms that in any way relate to vinyl chloride from any company or person to whom Defendant, Defendant's predecessor, or Defendant's subsidiary companies had distributed vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome, vague and ambiguous

as written, unlimited in time, harassing, irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of admissible evidence. See also PPG's response to Request No. 30.

52. Any information, warnings, or instructions issued to your employees concerning any possible health hazards from exposure to vinyl chloride.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is overly broad, unduly burdensome, unlimited in time and harassing. Furthermore, information pertaining to PPG employees is irrelevant to the issues in this action and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, please see PPG's responses to Request Nos. 4, 5, 18, 21 and 24 and documents produced.

53. Documents that refer or relate to Defendant, Defendant's predecessor's, or Defendant's subsidiary companies' membership, involvement, or participation in any group or committee of the Manufacturing Chemists Association (now called the Chemical Manufacturers Association) that dealt with vinyl chloride and potential hazards to human health, including, but not limited to, any Chemical Safety Data Sheets or meetings with OSHA or NIOSH officials or scientists or researchers.

RESPONSE: PPG incorporates by reference its General Objections. PPG further objects to this request on the grounds that it is vague and ambiguous as written, overly broad, unduly burdensome, unlimited in time, irrelevant to the issues in this action and not reasonable calculated to lead to the discovery of

admissible evidence. Finally, some or all the information sought, to the extent it exists, is easily accessible to plaintiff through publicly available records. Please refer to PPG's responses to Interrogatory Nos. 48 and 49.

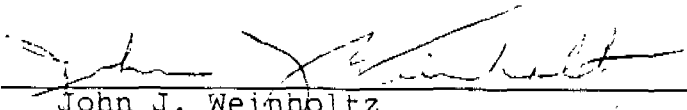
54. If not already requested above, any documents, any real or physical evidence, or any demonstrative evidence, including graphs, photographs, maps, models, charts, diagrams, drawings, films, video tapes, or other graphic representations of any kind which Defendant contends are relevant to this case.

RESPONSE: PPG incorporates by reference its General Objections. Furthermore, PPG objects to this request to the extent it seeks discovery beyond that which is required by the Federal Rules of Civil Procedure. Subject to and without waiving the foregoing objections, PPG cannot determine at this stage of this litigation what documents might be relevant to this case, and PPG makes no contentions in this regard at this time. PPG is presently unaware of any documents or information establishing that the plaintiff's decedent ever used or was exposed to toxic amounts of VCM manufactured by PPG. If such exposure can be established, PPG will supplement this response, to the extent required by the Federal Rules of Civil Procedure and subject to

the foregoing objections, after discovery has progressed to the point that the issues in this case have been defined.

DATED: Buffalo, New York
June 25, 1993

PHILLIPS, LYTLE, HITCHCOCK, BLAINE & HUBER

By 

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