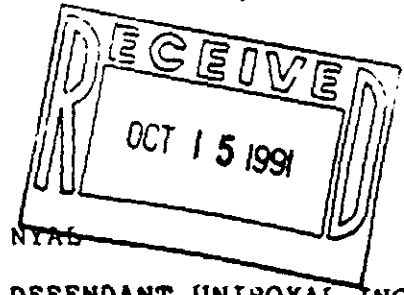


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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
and
SOUTHERN DISTRICT OF NEW YORK

In Re: JOINT EASTERN DISTRICT and
SOUTHERN DISTRICT ASBESTOS
LITIGATION

This Document Applies to All Cases
In Which UNIROYAL, INC. is named as a
Defendant.



NYAG
DEFENDANT UNIROYAL INC.'S
ANSWERS TO PLAINTIFFS'
FIRST STANDARD SET OF
LIABILITY INTERROGATORIES



Uniroyal, Inc. (Uniroyal), by its attorneys, Bizar
D'Alessandro Shustak & Martin, answering plaintiffs' First
Standard Set of Liability Interrogatories, states as follow:

- Q1. State the full name, address, telephone number and position of the corporate officer answering these interrogatories.
- A1. David J. O'Boyle, 455 Chase Parkway, Waterbury, Connecticut 06708, 203-757-9471, Assistant Secretary of Uniroyal.
- Q2. Have any documents and records of the defendant been used or referred to, in connection with the preparation of or answers to these interrogatories? If so, for each document referred to, state the following:

c. the present location and address of the personnel supplying information;

d. the contents of the information provided.

A3. See answer to interrogatory 2.

Q4. Please state in which state or states of the United States or what foreign countries your business is incorporated and where its principal place of business is located.

A4. Uniroyal is a dissolved corporation and exists only for the purpose of winding up its affairs. It was incorporated in the State of New Jersey and now has an office at 455 Chase Parkway, Waterbury, Connecticut.

Q5. Please state whether:

a. Your company is authorized to do business in:

- (1) New York
- (2) New Jersey
- (3) Connecticut

b. your company does business in:

- (1) New York
- (2) New Jersey
- (3) Connecticut

A5. See answer to interrogatory 4.

Q6. State the full and complete legal name under which your company or any predecessor is now doing business and has done business at all times from the date when it began mining, processing, manufacturing and/or selling asbestos products or thermal insulation products and materials up until the present time.

A6. The name of the defendant corporation was United States Rubber Company until February of 1967, when it was changed to Uniroyal, Inc.

Q7. Have you ever acquired, by way of a consolidation, merger, purchase of assets, or otherwise, any company which manufactured or sold any asbestos-containing products? If so, as to each such acquisition:

a. State the name and state of incorporation of the company which was acquired?

b. State the reasons for the acquisition;

c. State the date of the acquisition;

~~d.~~ State the terms of the acquisition, including but not limited to the consideration paid (e.g., amount of stock, cash, etc.) if any;

e. Identify all of the company's assets which were acquired (e.g., plants, machinery, stock in trade, trademarks, patents, goodwill, etc.);

f. Identify all of the company's liabilities which were assumed by you in the acquisition;

g. Identify each of the company's asbestos-containing product lines;

- h. Identify each asbestos-containing product line of the acquired company which you continued to manufacture after the acquisition;
- i. State the number of employees of the acquired company which were retained by you after the acquisition;
- j. State the names of the directors, officers, and major stockholders of your company and the acquired company at the time of the acquisition and the names of the directors, officers, and major stockholders of your company and, if it continued to exist, of the acquired company, after the acquisition;
- k. State the total number of shares of the acquired company which you held before and after the acquisition;
- l. Identify and produce a copy of the agreement between you and the acquired company, the pertinent minutes of your Board of Directors and all other related documents.

A7. In the 1920s or 1930s, Uniroyal acquired the businesses of two companies, New York Belting and Packing Co. and Peerless Rubber Manufacturing Co., which may have manufactured and sold certain mechanical rubber products containing asbestos. However, Uniroyal has no records or information relating to any sales of any asbestos-containing products by these companies.

Q8. State the names and positions of all corporate officers or officials having the responsibility for creating, directing or setting the policy of your firm with regard to the mining, manufacturing, processing, sale and/or packaging of asbestos products since 1930.

A8. Uniroyal objects to this interrogatory on the grounds that it is overly broad and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit.

Q9. Have you or any of your predecessors or subsidiaries ever mined, processed, refined, sold or distributed asbestos or asbestos containing products. If so, for each such product, complete an "Asbestos Product Information Sheet, Attachment #1."

A9. Uniroyal manufactured and sold asbestos containing fabric, yarn and tape bearing the trade names Asbeston and Asbestall from 1942 to June of 1976. See copy of pamphlet entitled "Facts about Asbestos in Yarns, Tape and Fabric", attached as Exhibit A.

Uniroyal otherwise objects to this interrogatory on the grounds that it is overly broad and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit. Without waiving the foregoing objections, Uniroyal further responds as follows:

Uniroyal manufactured and sold certain mechanical rubber goods such as hose, conveyor belts, packing, gaskets, etc., which may have contained asbestos from a date unknown until late 1972.

Uniroyal manufactured rocket motor shields containing asbestos from approximately 1959 to 1985.

Q10. If your company ever manufactured or sold any of the following types of asbestos products, please identify each product and describe how it is cut, shaped, mixed and applied on the job:

- a. Asbestos cement mixes;
- b. asbestos pipe covering;
- c. asbestos bricks or blocks;
- d. asbestos sheeting, boards or marinite;
- e. asbestos insulation used to protect against extremes of heat as well as cold;
- f. asbestos insulation in loose form which may be blown into homes or buildings;
- g. asbestos applied in spray form;
- h. asbestos tape, cloth, yarn, thread or tape;
- i. asbestos felt or blanket;
- j. asbestos paper;
- k. asbestos gaskets;

giving particular reference as to whether or not the materials have to be sawed or cut on the job, blown into confined areas, or mixed with water into a cement or paste.

A10. Asbestos tape, cloth and yarn.

Asbestos mechanical rubber goods.

Whether any of these items had to be sawed or cut on the job would depend upon the particular use to which it was being put by the purchaser.

Q11. Please state if there is any way known to you that the products listed in questions 9 and 10 can be used, applied or installed without the worker involved inhaling any asbestos dust or fibers.

A11. Uniroyal objects to this interrogatory on the grounds that it is irrelevant to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Uniroyal states that it is unable to answer this interrogatory inasmuch it is not known in what manner its products were used by the purchaser.

Q12. Is it possible to distinguish the asbestos products listed by you in Answers 9 and 10 from those manufactured or distributed by a competitor?

- a. If so, please describe how you contend your product can be distinguished and identify each of your products by trade and generic name.
- b. If there are products which, in your opinion, cannot be distinguished from products of a similar kind manufactured by a competitor, please state the name of each such similar product, who manufactured it, as well as the trade name of the product manufactured by your competitor.

A12. Uniroyal objects to this interrogatory on the grounds that it is vague and ambiguous. It is possible that a distinction could be made, but without knowing the particular product manufactured or distributed by others, Uniroyal does not know the manner in which such distinctions could be made.

Q13. For each asbestos product listed by you in Answers 9 and 10, state whether the product could be used interchangeably with products of other manufacturers, distributors, or sellers, and if so, please identify such product and manufacturer.

A13. It is possible that asbestos cloth, yarn or tape or mechanical rubber goods manufactured by another company could be used in place of Uniroyal products.

Q14. For each asbestos product listed by you in Answer 9 and 10, state the names and addresses of each New York customer who purchased the product and each New York job site to which the products were delivered by year, and complete a Worksite/Purchase Sales Information Sheet (Attachment II) for each purchaser or worksite.

A14. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information

that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence.

Q15. For each asbestos product you manufactured or sold, state the total dollar, linear feet and/or number of pounds of the product:

- a. Sold in New York State;
- b. Sold in the United States.

A15. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence.

Q16. Identify for the period from 1935 to 1980, each distributor, dealer, wholesaler and contractor who sold, distributed, or used your asbestos-containing products in New York City and within a 75-mile radius of New York City. For each such distributor, dealer, wholesaler and contractor, state:

- a. The name, last known address and person who you did business with;
- b. The years of your relationship with the distributor, dealer, wholesaler and contractor;

- c. Whether there was a written agreement. If so, identify it (or them) by date, title, signatories and present location;
- d. Whether the relationship was exclusive, i.e., whether the distributor was not allowed to carry competing brands of some or all of the relevant products. If exclusive as to any particular product, identify that product;
- e. The annual volume in pounds and linear feet and dollar amount of each type of asbestos product sold;
- f. The names and ultimate recipients of the asbestos products sold to or through each dealer, distributor, wholesaler, sales agent and contractor.

A16. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Uniroyal had no distributors, dealers, wholesalers, or contractors for its asbestos-containing products.

Q17. Identify each of your sales personnel responsible from 1935 to 1980 for sales of asbestos products in New York City and within a 75 mile radius of New York City. For each such person, state the years of such employment, his job title, the last known address and whether he is still your employee.

A17. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, Uniroyal states that Walter Hitchcock, whose last known address is R.D. 4-542B Country Club Drive, Easton, Maryland 21601, was Uniroyal's salesperson generally responsible for the New York area during the period of his employment at Uniroyal from 1944 to 1975.

Q18. Did you at any time manufacture asbestos-containing products which were sold to another manufacturer for resale by that company under its own name? If so:

- a. Identify each manufacturer to whom such sales were made and the date of such sales;
- b. Identify the product or products involved in each such agreement;
- c. If such sales were made pursuant to an agreement, identify the dates that each such agreement was in effect and produce a copy of the agreement.

A18. Upon information and belief, no.

Q19. Did you ever purchase any asbestos or any asbestos-containing products of any other manufacturer for distribution or sale under your name or trademark? If so:

- a. Identify each manufacturer from whom products were purchased;

- b. Identify the name of each product purchased;
- c. Identify the dates of each such purchase and distribution;
- d. Produce a copy of each purchase agreement.

A19. Upon information and belief, no.

Q20. Did you ever enter into distribution or licensing agreements with any manufacturer of asbestos-containing products? If so:

- a. Identify each manufacturer with whom such agreement was entered into;
- b. State the dates, products and geographical areas involved;
- c. Produce a copy of each such agreement.

A20. Upon information and belief, no.

Q21. For the period 1928 to the present, state the address of each miner, manufacturer or processor of asbestos or asbestos fiber used in your products and for each such miner, manufacturer or processor state:

- a. The date, amounts and delivery point for each shipment of asbestos you received;
- b. The products in which the asbestos was used.

A21. (a.) Existing records indicate that Uniroyal purchased asbestos fiber from

Bell Asbestos Mines, Ltd.
Thetford Mines, Quebec

Phillips Carey, Phillips Mine
Globe, Arizona

Van Packer Mines,
Globe, Arizona (also Ontario)

United Asbestos
Quebec, Canada

Huxley Development Corp.
New York, New York

Continental Asbestos Co. Ltd.
Canada

Cassiar Asbestos Corporation, Ltd.
Toronto, Ontario

Rhodesian & General Asbestos Corp., Ltd.
Bulaways, Rhodesia

Johns-Manville

Carey, Quebec, Canada

Herely, Chicago, Illinois

After a reasonable search, the only records Uniroyal has been able to locate reflecting purchase of raw asbestos are a small group of inventory cards. Those cards, summarized, indicate the following information:

TYPE	POUNDS	VENDOR	PURCHASE DATE	
Cassiar AAA	64,000	Bell	5/71	6/75
Bell 3K	1,400,000	Bell	5/71	3/75
C&G #1	190,000	U.S. Govt./Gen Serv. Adm.		8/71
C&G #2	570,000	Rhodesian	8/71	2/76
Cassiar A	1,200,000	Bell	11/72	9/73
Cassiar AA	550,000	Bell	5/71	9/73
C&G #2	300,000	Rhodesian	12/73	2/75

A21. (b) See answers to interrogatories 9 and 10.

Q22. With respect to each asbestos product (including loose asbestos fiber) you manufactured, refined, processed, sold or delivered, state whether you claim any caution, warning, caveat or other statement about health involved

in using the product and/or dust generated by the product was ever given to purchasers of the product or directed to the users of the product. If so, state separately for each product:

- a. The precise wording of each caution or set of instructions;
- b. For each asbestos product, the exact date you claim each caution was first used on that product;
- c. The inclusive dates you contend any alleged warning was affixed to each of your asbestos-containing products;
- d. Whether the wording of the alleged warning has been altered since its first appearance, and if so, when and how amended;
- e. Specifically, what prompted you to first affix such caution, warning, caveat, statement or explanation, and what prompted the amendments, (i.e., if medical reports were relied upon, if so, identify such reports).
- f. The name, title and present address of the author of each such warning and/or instructions;
- g. Whether the warning and instructions were physically attached to the product itself when sold and/or delivered by you, and if so, the method of attachment;
- h. Whether you have a copy of the warning and/or instructions in your possession at the present time, and if so, where it is located;

A22.(a-h) Upon information and belief, beginning in approximately 1972 until the discontinuance of its asbestos operations in 1976, Uniroyal may have affixed a warning to its Asbeston fabric. Uniroyal is unable to

state the exact wording of any such warning, whether such warning was affixed or attached to the asbestos product or to the packaging in which the product was contained, whether any such warning could be removed from the asbestos or packaging, the color and size of any such warning, where on the asbestos product or packaging any such warning was affixed, and the period of time during which any such warning accompanied or was attached to such products, whether any amendments were made to any such warning, the dates of any such amendments and the reasons for them, and to the extent there were any amendments, the name and address of any person who recommended or ordered any such change.

i. Upon information and belief, none.

Q23. State whether any of your distributors, dealers, contractors and/or customers were provided with any warnings, cautions, caveats or instructions regarding the use of your asbestos-containing products. If so, please state:

- a. By whom and when these instructions were first made;
- b. Whether the instructions were written or oral; if written, attach a copy; if oral, state the contents thereof;
- c. Whether your company carried out follow-up inspections to ascertain whether such instructions were adhered to

and if so, please state when, where and by whom such inspections were made and the results of each such inspection.

A23. As to its distributors, dealers or contractors, see answer to interrogatory 16;. Upon information and belief, as to its customers, see answer to interrogatory 22.

Q24. State the first time any officers of your Company discussed putting a warning or caution on any asbestos-containing product, and as to that first discussion, state:

- a. the names of the persons who were involved in the discussions and the date and place of the discussions;
- b. the identity and location of all documents memorializing the discussion;
- c. the alleged substance of the discussion;
- d. what action, if any, the Company took as a result of the discussion.

A24. Upon information and belief, Uniroyal first considered putting a warning on its asbestos- containing products in 1972. Discussions relating to that procedure were conducted at its manufacturing plant in Hogansville, Georgia. To the extent that the substance of such discussions is reflected in documents in Uniroyal's possession, such documents will be made available to plaintiffs for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q25. Do you know of any facts or documents to support a claim that you provided any warnings, instructions or information as to the dangers of asbestos inhalation to any insulator, construction worker, building trades worker or other user of your asbestos products in the New York area prior to 1972? If so, for each such alleged warning:

- a. Describe in detail each such warning, instruction or information given;
- b. State the exact date of each such warning;
- c. State whether such warning, instruction or information was oral or written;
- d. If oral, identify the substance of the warning instruction or information given and the date and name of the person to whom given;
- e. If written, or printed, attached a copy of each warning, instruction and information, identify it by date given, title and reference number and state the manner and location whereby it was transmitted to users of the product.

A25. No, not to Uniroyal's knowledge.

Q26. Do you claim that you ever recommended to purchasers or users of the asbestos-containing products you manufactured, processed, mined, distributed, or sold, that respirators, protective masks and/or protective safeguards be worn while working with, installing or removing your asbestos-containing product? If so, state separately for each product:

- a. The date or dates when each such recommendation was made;
- b. Who made the recommendation;
- c. When and precisely to whom the recommendations were made;
- d. If oral, the manner and substance of the recommendation;
- e. If written, identify the document by title, date, file designation and author of each such recommendation and the location and present custodian of each such recommendation.

A26. Upon information and belief, no.

Q27. Did you at any time recommend that your own employees use respirators, protective masks or other precautionary safeguards when working with asbestos-containing materials? If so, state:

- a. When and precisely to whom such recommendations were made;
- b. Whether you ever supplied any respirators, face masks to your employees, and if so, the date when first supplied and whether you are supplying them now;
- c. From what specific source you have obtained such respirators and face masks (state address of company and dates obtained).

A27. Uniroyal objects to this interrogatory on the grounds that it is irrelevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery

of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Without waiving the foregoing objections, Uniroyal responds as follows:

Yes. Respirators were provided to employees at the Hogansville, Georgia plant. It is not known where these respirators were purchased.

Q28. Have you stopped producing, distributing and/or selling or has asbestos been eliminated from any of the asbestos products listed in Answer 9 or 10? If so, state for each product:

- a. The reason and date you stopped producing the product, or eliminated asbestos;
- b. The names and titles of each person who recommended and who authorized or directed the action;
- c. Whether any studies were conducted before you directed that production and sale of the product be stopped, or asbestos eliminated from the product, and if so, identify each study by date, author, title and subject matter and attach a copy.

A28. (a) Without waiving the objections to relevancy contained in answer to interrogatory 9, Uniroyal responds as follows: Yes. For economic reasons, Uniroyal ceased the production of mechanical rubber

goods containing asbestos at various dates prior to 1972; it ceased the production of asbestos cloth, yarn and tape in 1976; it ceased the production of rocket motor shields containing asbestos in 1985.

(b) Unknown.

(c) Upon information and belief, no.

Q29. Have any officers or employees of defendant ever discussed or evaluated whether sales of your asbestos products would be damaged if the public learned of the health hazards associated with asbestos exposure? If so, state the dates and names of participants of each such meeting and identify all documents relating to such meetings.

A29. To the extent such view may have been expressed, and is reflected in documents in Uniroyal's possession, such documents will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q30. At the time of the development of, and sale of each of your asbestos product did you attempt to determine whether the product complied with any allegedly applicable safety

standards, orders or rules, regulations or design requirements promulgated by any professional society, association, or government body?

- a. If you did not, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis;
- b. If you did, identify the safety standards, safety orders, rules, regulations, which you claim you considered by naming the title, number, page and date of the regulation, and identifying the place where a copy of said regulation can be obtained.

A30. Uniroyal objects to this interrogatory on the grounds that it is overly broad, and seeks information that is irrelevant and immaterial to the subject matter of this litigation and not reasonably calculated to lead to the discovery of admissible evidence.

Q31. For each asbestos-containing product, identify and produce all promotional and/or advertising material used by you with regard to the sale and/or promotion and distribution of such products.

A31. To the extent such material is in existence, it will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q32. Identify and produce pictures and descriptions of each product.

A32. To the extent such material is in existence, it will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q33. Were any brochures, writings, or other materials made available to distributors, dealers, contractors, ultimate users, or the general public concerning the design, manufacture, use, quality and/or properties of the asbestos products referred to in Answer 9 and 10? If so, for each such brochure or other material:

- a. State the purpose of each brochure and give the name, present address, telephone number of the person responsible for the preparation and acceptance of the material for distribution on behalf of the company;
- b. Identify the brochure or material by author, date and present location and custodian and attach copies of each.

A33. To the extent such material is in existence, it will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q34. Have you at any time since 1930 bought from, sold to, delivered or supplied any asbestos products to any other defendant in this action or to any other manufacturer listed in Attachment 3? If so:

- a. Identify the products involved by name and description;
- b. List the dates, quantity and price of each sale and the names of the persons who placed or accepted the order;
- c. Were any warnings regarding the health hazards of the product given or received and if so identify the warning by description, date, to whom it was given and by who received, and if oral state the substance and if written identify the document and state its present location.

A34. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence.

Q35. With respect to any product manufactured by you which does not contain asbestos, have you every included a warning with the product indicating that it may in some way be harmful to human beings? If so, for each such non-asbestos containing product state:

- a. The name of the product, its intended use or purpose, and the chemical composition or ingredients of the product;
- b. The manner in which it is thought that the product may cause harm to human beings;
- c. The size, color, and contents of each warning;
- d. The date warning was first given to the public;

e. The names, addresses and titles of the people responsible for or participating in the decision to provide the warning; and

f. Identify every document which relates to the making of the decision to provide a warning.

A35. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, and seeks information that is not irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery admissible evidence.

Q36. Were any of the asbestos-containing products sold by you to private persons or companies (i.e., non-military or non-government sales) the same products you sold to the government pursuant to military or federal specifications? If so please state:

a. Your name or designation for the product;

b. The military or federal specification you claim is applicable;

c. The person or company to whom sold and date and amount sold.

A36. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome, seeks information that is irrelevant and immaterial to the subject matter of this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the

foregoing objections, Uniroyal states that upon information and belief, it sold asbestos-containing products to both military and non-military customers with the same specifications.

Q37. Do you claim that you did anything prior to 1972 to notify users of asbestos-containing products of the possible dangers of inhalation of asbestos dust and fibers? If so, explain in detail what you did, to whom and give the dates.

A37. Upon information and belief, no.

Q38. Had you at any time prior to 1973 performed, participated in, or financed any tests, studies, investigations or analyses to determine the asbestos level produced when your asbestos products were used, installed or removed from a prior installation?

A38. Upon information and belief, no.

Q39. Had you at any time prior to 1973 performed, participated in, or financed any tests, studies, investigations or analyses to determine the effects of your product on workers using or working with any of your asbestos products?

A39. Upon information and belief, no.

Q40. Had you at any time prior to 1973 performed, participated in, or financed any tests, studies, investigations or analyses which had the purpose to prevent, minimize, or eliminate inhalation of asbestos dust or fibers by those using or exposed to your asbestos products?

A40. Upon information and belief, no.

Q41. Had you at any time prior to 1973 performed, funded or participated in any investigation, study, test or analysis concerning asbestos-related diseases, asbestosis, pulmonary diseases or cancer?

A41. Upon information and belief, no.

Q42. Had you at any time prior to 1973 performed, participated in, or financed any tests, studies, investigations or analyses to determine the effects of inhalation of asbestos dust or fibers on any one using or being exposed to asbestos products manufactured by your company?

A42. Upon information and belief, no.

Q43. Have you ever performed, participated in or financed any studies to determine whether any type of respirator and/or protective mask would either eliminate or reduce asbestos inhalation to safe levels?

A43. Upon information and belief, no.

Q44. Have you ever undertaken or financed any tests or studies to determine whether any type of ventilator or ventilating system would eliminate or decrease the number of airborne asbestos fibers in confined spaces?

A44. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q45. For each study identified in response to Questions 38-44, state:

- a. The subject matter, title, date and names of the persons who conducted and/or authored the study;
- b. The reason for the study;
- c. The date the study was completed;
- d. If the results were disseminated, where and to whom and if published the name and identity of the publication;
- e. The results of each study, and the data and assumptions relied on;
- f. If in writing, identify it by date, title, identification number, present location and custodian and attach a copy.

A45. See answers to interrogatories 38-44.

Q46. State whether you took any action as a result of any of the studies listed in answer to interrogatories 38, 39, 40, 41, 42, 43 and 44. If so:

- a. Describe the date and action taken;
- b. Identify who authorized or directed the action;
- c. Why was the action taken;
- d. Identify all documents discussing the study, the action considered and the action taken by date, title, subject, author and present custodian and location and produce the documents;
- e. If you have not taken any action state in detail, why not;
- f. If you have not given any consideration to taking such actions, state in detail the reasons why.

A46. See answers to interrogatories 38-44.

Q47. From the year 1920 to date, have you supported by gift, grant, direct cash or property payment any kind of medical research concerning asbestos? If so, state:

- a. The date or dates of such support;
- b. The dollar amount paid or contributed;
- c. The identity of the persons and/or organizations carrying out the research study;
- d. The title, name or other identification of each such study;
- e. Identify and produce all documents relating to each such study.

A47. Upon information and belief, no.

Q48. Have you, at any time prior to 1975, conducted, financed, or had conducted for you any asbestos inspection or made any dust count in any facility where your asbestos products were used? If so, state the date, place and people involved in each such inspection or test and identify all records.

A48. Upon information and belief, Uniroyal has no records in its files regarding dust counts it conducted in any facility where its asbestos products were used. However, Uniroyal has become aware through litigation that dust counts were apparently taken by a Uniroyal representative at Scapa Dyers, Inc., Waycross, Georgia in 1974.

Q49. Had you, at any time prior to 1975, conducted, financed, or had conducted for you any asbestos inspection or made any dust count in any of your own plants which are or were engaged in the manufacture of asbestos products? If so, state the date, place and people involved in each such inspection or test, the results of the tests and identify all records.

A49. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile

workers to asbestos dust and fiber. Therefore, a description of the safety precautions Uniroyal has undertaken on the protection of its own employees from exposure to asbestos is not relevant to the specific issues in the lawsuit.

Q50. Does your company recognize that workers in the following trades were foreseeable users of your asbestos products? If so, when did you come to such a recognition?

- a. Pipe Ladders;
- b. Pipe Fitters;
- c. Welders;
- d. Burners;
- e. Sheetmetal Workers;
- f. Tapers;
- g. Chippers;
- h. Plasterers;
- i. Riggers;
- j. Grinders;
- k. Inspectors
- l. Shipwrights;
- m. Painters;
- n. Boilermakers;
- o. Insulators;
- p. Custodians;

q. Planners;

r. Testers

s. Teachers.

A50. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q51. Does your company recognize that the types of workers in Question 50 would be exposed to asbestos in the course of working on jobs where other trades would be using asbestos products?

A51. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q52. Does your company recognize that it was foreseeable that people working in the same area where your asbestos products were being used or installed would inhale and/or ingest asbestos fibers emitted from your products?

A52. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q53. Does your company recognize that it was foreseeable that trademen listed in Question 50 would inhale and/or ingest asbestos fibers released from your asbestos products.

A53. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q54. Do you contend that any respirators or other breathing devices would prevent inhalation of the asbestos dust and fibers released from your product? If so, state:

- a. When the respirator was sold;
- b. Give the detailed description of such respirator or other breathing device;
- c. The first date you reached the conclusion;
- d. The basis of your claim that use of the respirator will prevent the inhalation of such dust and fibers;
- e. Identify any relevant tests performed by date, title, author and number.

A54. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q55. From the year 1930 to the present, identify:

Q57. From the year 1930 to the present, state:

- a. The address of each medical library maintained by you or your subdivisions and/or contract units;
- b. When each such library came into existence;
- c. The custodian for each such library facility records, such as individual's dates of employment and last known address or current address.

A57. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the aforesaid objections, Uniroyal states that it maintained no medical library.

Q58. For each facility identified in response to the two preceding interrogatories, state the name and title of each medical journal or periodical subscribed to and the inclusive dates of each such subscription.

A58. See answer to interrogatory 57.

Q59. Other than the medical library facilities referenced in the answers to the immediately preceding three interrogatories, state the identity of each medical library, from 1930 to date, in which you held a membership, or funded by way of contribution, gift, grant, or any other direct cash or property payments.

A59. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the aforesaid objections, Uniroyal states that it was not a member of, nor funded any such medical library.

Q60. State the names and addresses of all professional, trade, industrial, safety, hygiene, or health associations and research foundations or organizations you have been a member of since 1930 indicating for each association:

- a. The inclusive dates of your membership;
- b. The names of your employees who attended meetings and the dates and designations of such meetings;
- c. The positions held by any of your employees;
- d. The location of all minutes, digests, reports and documents received or concerning such association.

A60. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome and seeks information that is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the aforesaid objections, to the extent this interrogatory relates to an affiliation associated with asbestos-containing products, Uniroyal was a member of the

Asbestos Textile Institute (ATI) from (a) 1960-1976; (b&c) Uniroyal does not maintain records regarding the dates of ATI meetings, and its representatives who attended them. Such information should be ascertained from records of that organization. (d) To the extent that any ATI documents are in Uniroyal's possession, they will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q61. When did you first learn that there were health hazards associated with the use and/or fabrication of asbestos containing products? State the date, source, nature and extent of such information.

A61. For a number of years, Uniroyal has been aware that prolonged exposure to high levels of asbestos dust or fibers during the manufacture of its asbestos-containing products might result in health problems. Uniroyal is unable to state at this time specifically when the Company first became aware of this, and accordingly, is unable to identify documents relied upon by persons whom the Company may have consulted at this time. During the period Uniroyal manufactured asbestos-containing products, there was considerable debate regarding what constituted a "safe" level of exposure to asbestos dust or fibers. Without waiving its relevancy objections to discovery

relating to the protection of its own employees from exposure to asbestos, Uniroyal's policy was always to reduce the levels of asbestos dust or fibers in its workplace and to ensure that its employees were not exposed to asbestos dust or fiber levels higher than those generally considered safe at that time.

Q62. Have you knowledge of any deaths or cases of lung disease or lung impairment prior to 1975 among your employees engaged in the manufacture or use of asbestos products which are attributable to, or were alleged to be caused by, the inhalation of asbestos dust or fibers? If so, please give the name and address of each employee, identify all medical records possessed in relation to the employee, and state whether reports of occupational disease were furnished to any bureau, branch or governmental body of the relevant state; attach copies of the latter.

A62. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Therefore, these

workmen's compensation claims are not relevant to the specific issues raised in this lawsuit. However, without waiving the foregoing objections, Uniroyal states that it received workmen's compensation claims prior to 1975 from employees who were exposed to asbestos and who alleged pulmonary problems. Information relating to the identity and records of those individuals is confidential, and cannot be released by Uniroyal without the consent of the individuals.

Q63. If any of your employees or officers have testified at trial or by deposition in any litigation or before any Congressional Committee or administrative agency concerning asbestos exposure, pulmonary or asbestos-related diseases or industrial hygiene relating to asbestos use, state:

- a. The name, address and title of each person who testified;
- b. The date, location and forum of such testimony;
- c. Whether the defendant has a copy of such testimony;
- d. Whether the defendant will voluntarily produce a copy of such testimony.

A63. Upon information and belief, none.

Q64. Have you or any employee or agent of yours ever communicated with an agency or department of the United States concerning specifications and/or standard for any asbestos product or thermal insulation product? If so state separately for each product or set of specifications:

- a. Identify each such product and its military or federal specification or standard;
- b. The intended purpose or use for the product so specified;
- c. The date, time and place of each communication including:
 - (1) The name of each of your agents or employees who participated in each communication;
 - (2) The names, titles, and agencies of each individual with whom such communication was had;
 - (3) The subject of the communication;
 - (4) Whether any notes, minutes or memoranda in any form were recorded of such communication or of any meetings between you and the agency;
 - (5) Whether any documents were submitted to the agency;
 - (6) If (4) or (5) is answered in the affirmative state the name, and location of the custodian of such records.

A64. Uniroyal objects to this interrogatory on the grounds that it is overly broad and burdensome and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit.

Q65. Does your company recognize that:

- a. Asbestos causes asbestosis;
- b. Asbestos exposure leads to an individual contracting asbestosis;
- c. There is a correlation between exposure to asbestos and the occurrence of asbestosis;
- d. Asbestos causes lung cancer;
- e. There is a correlation between asbestos exposure and the occurrence of lung cancer;
- f. Asbestos contributes to the development of gastro-intestinal cancer;
- g. That a portion of inhaled asbestos fibers remain in the lungs after being inhaled into the human body and are not destroyed?
- h. The symptoms of asbestosis and other asbestos-induced lung diseases or cancers may not manifest themselves until many years after the asbestos was inhaled into the body?
- i. Prolonged use of the asbestos material can cause or contribute to various occupational diseases, including asbestosis, mesothelioma, cancer and other lung and respiratory diseases?
- j. The use of asbestos insulating products listed in Answer (10) are dangerous and harmful to human health?
- k. There is a connection between the inhalation of asbestos dust and fibers and the disease mesothelioma?

If your answer to any part of this question is "Yes", explain when you came to this knowledge and what, if anything, you have done about it to notify the public

or users of your products. If your answer is that your products are not harmful then explain what facts and tests were made upon which you base such conclusion.

A65. Uniroyal objects to this interrogatory on the ground that it calls for medical conclusions which Uniroyal is not qualified or competent to give.

Q66. Have any workman's compensation claims based on asbestosis, mesothelioma, lung cancer, other cancers, asbestos-induced diseases, or lung diseases been filed against you? If so, for each claim state:

- a. The date, place filed, reference numbers and outcome of each claim;
- b. Whether you advised your workers' compensation carrier of the claims;
- c. The location and custodian of all records of claims and correspondence with your compensation carrier.

A66. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Therefore, these workmen's compensation claims are not relevant to the specific

issues raised in this lawsuit. Without waiving the foregoing objections, Uniroyal states that it has received workmen's compensation claims from workers alleging exposure to asbestos.

Q67. Have you as part of your business ever employed any steam plant operators, boiler repair workers, insulator or had a division or unit which installed insulation materials on a contract by contract basis (e.g., a "contract unit")? If so, state:

- a. The location where such persons or unit was based;
- b. The names of the operators or managers of the contract units;
- c. Whether there existed rules, regulations and/or work practices which were to be followed by such employees;
- d. Were such employees ever required to wear respirators. If so, please state:
 - (1) Whether the requirement was by written regulation or oral direction;
 - (2) The names of the people in your firm originating such a requirement and/or in charge of enforcing it;
 - (3) The date the requirement was imposed for the first time.
- e. Have such former employees ever filed workmen's compensation claims due to lung or coronary illness. If so, for each such claim, state the date, jurisdiction and docket number and outcome of the claims.

A67. Uniroyal objects to this interrogatory on the grounds that it is overly broad and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal employess to asbestos dust or fiber. Therefore, a description of the precautions Uniroyal has undertaken of the protection of its own employees from exposure to asbestos is not relevant to the specific issues raised in this lawsuit. Without waiving the foregoing objections, upon information and belief, no.

Q68. State the total number of employees of yours or your contract unit receiving benefits under any Occupational Disease or Workers Compensation statute for asbestosis, mesothelioma, bronchogenic carcinoma and/or cancer of the stomach, colon or rectum for each year, from the date that you first manufactured, distributed or sold any asbestos-containing products until the present time.

A68. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this lawsuit does not involve the alleged workplace exposure of

Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Therefore, these workmen's compensation claims are not relevant to the specific issues raised in this lawsuit. Without waiving the foregoing objections, Uniroyal states that it has received workmen's compensation claims from workers alleging exposure to asbestos.

Q69. State by year the total dollar amount paid out by you, your contract unit and/or your insurance carrier as a result of claims under any Occupational Disease or Workers' Compensation statute for asbestosis, mesothelioma, bronchogenic carcinoma and/or cancer of the stomach, colon or rectum.

A69. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Therefore, the total dollar amount of workmen's compensation claims are not relevant to the specific issues raised in this lawsuit.

Q70. Identify any action, other than workers' compensation claims, brought against you by claimants injured as a result of exposure to asbestos and asbestos-containing products prior to 1970, stating the court in which the action was brought, the date of filing, case style, and case number.

A70. Uniroyal objects to this interrogatory in that it is overly broad and burdensome, and not reasonably calculated to lead to the discovery of relevant information, and the information is a matter of public record.

Q71. State separately for each calendar year for the period 1928 to the present:

- a. The total amount of asbestos mined by your company;
- b. The total pound volume of asbestos fiber purchased by your company;
- c. The total pound volume of asbestos used by your company in its manufacturing processes
- d. The total pound volume of asbestos sold by your company;
- e. The total pound volume of asbestos acquired by your company in any manner other than mining or purchase, and identify the manner of acquisition for each year;
- f. The total dollar value of asbestos mined by your company;
- g. The total dollar value of asbestos purchased by your company in its manufacturing process;

- h. The total dollar value of asbestos used by your company;
- i. The total dollar value of asbestos sold by your company;
- j. The total dollar value of all asbestos-containing products sold by you;
- k. The total number of pounds or linear feet of each asbestos product sold by you and the dollar value of such sales;
- l. The percentage of sales by dollar value and by linear foot and weight of your asbestos as compared to all asbestos sold in the United States;
- m. The percentage of sales by dollar value and by linear foot and weight of your asbestos-containing material as compared to all asbestos-containing material sold in the United States.

A71. Uniroyal objects to this interrogatory on the grounds that it is overly broad and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit.

Q72. Did you in any way finance, assist or participate in:

- a. The Metropolitan Life—Insurance Company studies of asbestos conducted from 1929-1950;
- b. The Trudeau Foundation Saranac Lake studies from 1929-1960;
- c. The Quebec Asbestos Mining Association Study of Asbestos and Health between 1940 and 1970.

If so, state what role or action you took and identify all documents relevant to such activities by name, date, title, file number and present location.

A72. No.

Q73. Has your firm ever been cited or admonished by any government agency (federal, state or local) for dust levels in excess of any threshold limit value (TLV) or other predetermined number? If so, please state:

- a. The date the government agency and the dust and TLV number involved;
- b. The means of identifying any document related to such an occurrence;
- c. Any action taken by the agency involved.

A73. Uniroyal objects to this interrogatory on the grounds that it is overly broad and seeks information that is irrelevant and immaterial to the subject matter of this lawsuit and is not reasonably calculated to lead to the discovery of ~~admissible~~ evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to dust or fiber.

Q74. State whether from 1930 to date you promulgated any rules, written or oral for the handling of asbestos or asbestos products by your own employees? If so, state:

- a. When such rules were promulgated;
- b. The substance of the rules, if oral, and the name, address and title of the person who disseminated them;
- c. If in writing, either attach a copy of the rules or identify the written rules by date, title, identification number, present location and the name and address of the custodian thereof;
- d. Whether any such material was provided to any users of your asbestos products and, if so, when and to whom.

A74. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Without waiving the foregoing objections, Uniroyal states that it has no knowledge as to whether any such materials was provided to users of Uniroyal's asbestos-containing products.

Q75. Have any of your employees been reassigned to other duties because of pulmonary or coronary health problems? If so, please state for each such reassignment:

- a. The date and reason for reassignment;
- b. The jobs prior to and after reassignment;
- c. The age and health problem of the person reassigned.

A75. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber. Therefore, a description of the precautions Uniroyal has undertaken of the protection of its own employees is not relevant to the specific issues raised in this lawsuit.

Q76. Prior to 1972, have your employees ever been subject to periodic medical examinations? If so, please state:

- a. Whether the examinations were performed by your firm, its agents or employees or by outside personnel either private or governmental;
- b. Whether the examinations were performed as a result of an internal corporate decision or to comply with some governmental rule;
- c. Whether any person was rejected for employment as a result of such examination. If so, state the date and reason for such rejection;
- d. Whether any employee was reassigned, terminated or pensioned as the result of such examination and the date or reason for each such occurrence.

A76. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. This lawsuit does not involve the alleged workplace exposure of Uniroyal asbestos employees or other asbestos textile workers to asbestos dust and fiber.

Q77. Have you ever removed or had removed any asbestos insulation or other asbestos containing material from any building, plant or facility which you owned, operated, leased or maintained? If so, identify the building or facility, state the date the asbestos material was removed and who removed the asbestos, and identify all documents relating to or referring to the removal.

A77. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q78. Was the monitoring of dust levels required by any governmental regulation or rule of any government, agency, or insurance agency? If so, state the substance of the rule, the source imposing it and the date it was first imposed.

A78. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Q79. Do you agree that the possibility of exposure to asbestos dust and fibers extends not only to workers actually handling the asbestos products but also to:

- a. Other workers in the area where the asbestos products are being used;
- b. Members of the families of workers.

A79. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Uniroyal further objects on the ground that it calls for a medical conclusion which Uniroyal is not qualified or competent to give.

Q80. Does your company have a record or document "retention" policy, plan or program? If so, please describe such plan. If the plan is different for separate categories of records, please describe the plan for each category. Please include in the description the following:

- a. The name and title of the custodian of the records;
- b. The length of time for which records are retained;
- c. The titles and names of the personnel responsible for determining the policy or plan from 1935 to the present;
- d. The titles and names of the personnel responsible for the removal and destruction of any records, pursuant to any such plans from 1935 to the present.

A80. Uniroyal had a record retention policy, a copy of which will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q81. Have you destroyed any documents, records or writings pertaining to:

- a. Health hazards of asbestos;
- b. Workmen's Compensation claims arising out of asbestos, lung cancer, mesothelioma, cor pulmonale, pneumoconiosis, or pulmonary fibrosis;
- c. placing warning labels on your products;
- d. Hazardous conditions in your plants or factories;
- e. Funding of studies about health hazards of asbestos;
- f. Lawsuits arising out of injuries alleged to having been caused by asbestos;

If so, list every such document destroyed by author, date and subject matter.

A81. Upon information and belief, no.

Q82. Have you ever had a division or subsidiary engaged in the business of abating, removing or encapsulating asbestos materials? If so, state:

- a. The name of the unit of all personnel involved;
- b. The location where such persons or units were based;
- c. The dates such person or units functioned;
- d. The sites where such abatement, repair, encapsulation or removal occurred.

A82. No.

Q83. Identify and produce all Minutes of each meeting of the Board of Directors or of any committee of the Board at which meeting the hazards of asbestos exposure, and/or the possible application of warning labels on asbestos-containing products were discussed.

A83. None.

Q84. If there is any person whom the defendant expects to call as an expert witness at trial, please provide a copy of the witness' curriculum vitae, or summary of the witness' qualifications if there is no vitae, and please state for each such expert witness:

- a. The person's identity, giving name, profession or occupation and address;

- b. The subject matter on which each such expert is to testify;
- c. The substance of all facts and opinions regarding which each such expert is to testify;
- d. A summary of the grounds for each opinion of each such expert;
- e. Whether the facts and opinions listed in (c) above are contained in a written report, memorandum or transcript and if they are, produce the same pursuant to the Rule 34 Notice of Production of Documents attached hereto;
- f. If the opinion of any expert listed above is based in whole or in part on any code or regulation, governmental or otherwise, identify said code or regulation and specifically set forth the section relied upon;
- g. Whether each such expert intends to base his or her testimony on any book, treatise, article, study, or any other document, and, if so, identify all such documents; and
- h. Whether the witness has testified at trial or by deposition in other asbestos-related personal injury or wrongful death cases, and if so, state for each such case:
 - (1) the name and docket number;
 - (2) the court in which each such case was pending; and
 - (3) the party for whom the witness testified.

A84. Uniroyal has made no decision as to what expert or experts it intends to call at the trial of any action.

Q85. Identify the name and address of each nonexpert witness whom you intend to call at trial, and specifically set forth the nature and substance of the matters to which

each such person will testify and summarize the facts to which each such person will testify.

A85. Uniroyal has made no decision as to what non-expert witnesses it intends to call at the trial of any action.

Q86. Identify and produce each exhibit that you intend to rely upon at trial.

A86. Uniroyal has made no decision as to any exhibits it intends to rely upon at trial.

Q87. Identify all persons, other than your attorneys, who provided you with any information used in answering these interrogatories, and state the particular information each person supplied.

A87. These answers were provided as the result of a review of Uniroyal's records and information provided by former employees of Uniroyal. There is no way of attributing any particular information provided by any particular employee to an answer contained herein.

Q88. At any time prior to 1972, did you learn of any recommended levels of asbestos proposed by The American Conference of Governmental and Industrial Hygienists (ACGIH)? If so, state:

- a. The exact date you first learned of any ACGIH recommended levels;
- b. How you first learned of it;
- c. Which of your employees or agents first learned of it;
- d. The steps or action you took to advise your sales personnel of the recommendation;
- d. The steps or action you took to advise your customers, dealers, distributors and contractors of the ACGIH recommendation;
- f. Any comment you filed or submitted to ACGIH?

A88. To the extent that Uniroyal was aware of any recommended levels of asbestos proposed by ACGIH, it would be reflected in Uniroyal records. To the extent such material is still in existence, it will be made available for inspection and photocopying at 455 Chase Parkway, Waterbury, Connecticut.

Q89. Do you contend that there is a minimum safe threshold level of exposure to asbestos below which there is no risk in developing mesothelioma or lung cancer? If so, specify the minimum safe threshold level of exposure for each disease, the date you claim the threshold was arrived at, and the precise basis for your contention.

A89. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of

this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Uniroyal also objects on the ground that it calls for a medical conclusion which Uniroyal is not qualified or competent to give.

Q90. Do you contend that there is any difference between chrysotile fiber, amosite fiber, crocidolite fiber, and/or tremolite fiber in the development of (a) mesothelioma; and (b) lung cancer? If so, explain in detail your contention as to the distinction between or among fiber types in the development of each disease and the medical authority you rely on.

A90. Uniroyal objects to this interrogatory on the grounds that it is irrelevant and immaterial to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. Uniroyal also objects on the ground that it calls for a medical conclusion which Uniroyal is not qualified or competent to give.

Dated: New York, New York
February 25, 1988

BIZAR D'ALESSANDRO SHUSTAK
& MARTIN

By Gayle S. Sanders
GAYLE S. SANDERS
A Member of the Firm
485 Madison Avenue
New York, New York 10022
(212) 752-7200
Attorneys for Defendant
Uniroyal, Inc.

VERIFICATION

State of New York)
 : SS:
County of New York)

GAYLE S. SANDERS, being sworn, deposes and says:

I am a member of the law firm of Bizar D'Alessandro Shustak & Martin, attorneys for defendant Uniroyal, Inc. My office is located at 485 Madison Avenue, New York, which is within the County of New York. This verification is made by me because defendant Uniroyal's offices are not within the County New York, where I have my office.

I have read the foregoing answers of defendant Uniroyal Inc. to plaintiffs' First Standard Set of Liability Interrogatories and know its contents, and that the same is true to my own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true, and that the source of my information and the grounds for my belief are statements made to me by defendant Uniroyal, Inc.'s representatives and my review of documents provided by said defendant.

Gayle S. Sanders
GAYLE S. SANDERS

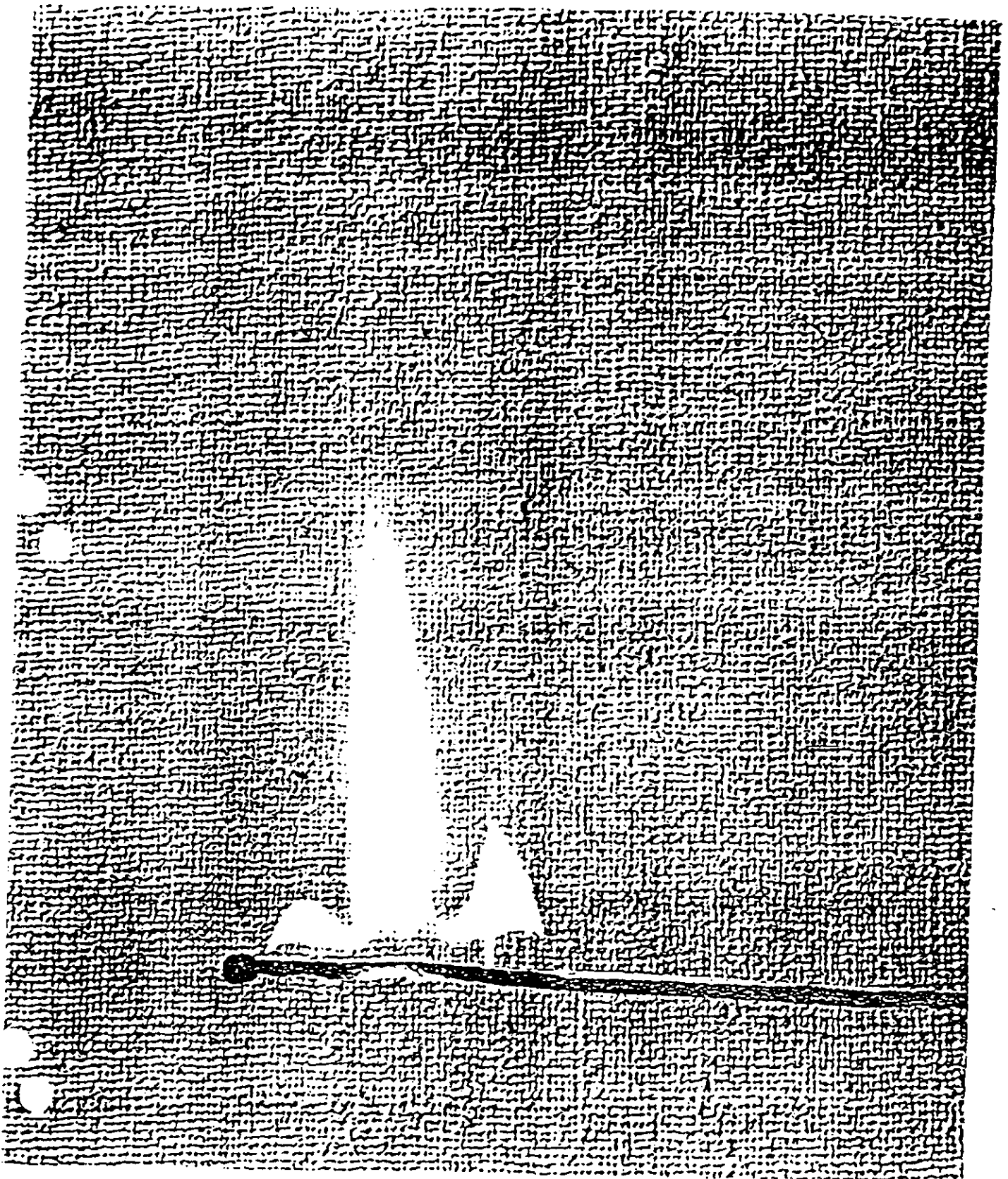
Sworn to before me this
25th day of February, 1988.

Susan C. Stanley
Notary Public

16832

SUSAN C. STANLEY
Notary Public, State of New York
No. 24-4838435
Qualified in Kings County
Commission Expires Jan. 31, 1990

Facts about Asbeston®
in yarns, tape, and fabrics.



UNIROVAL

Asbeston combines fire resistance with high strength and good appearance.

Asbeston is U.S. Rubber Company's registered trade name for yarns, fabrics and tapes made from asbestos.

We have developed a patented process for spinning asbestos fibers into lightweight, fine gauge, high tensile strength yarns. Because of these properties, Asbeston yarns produce flexible, attractive fabrics of low bulk.

To meet today's growing need for a durable, abrasion-resistant fabric with fireproof characteristics, we combine asbestos with other natural fibers and with man-made fibers, including glass, acrylic, polyester and olefin.

The temperature limits of Asbeston depend on the percentage of asbestos fiber in fabric, as follows:

Grades ASTM standards	Normal temperature limitations
Commercial (C)	75% to 79% inclusive up to 400° F
Undervriters (U)	80% to 84% inclusive up to 450° F
A	85% to 89% inclusive up to 550° F
AA	90% to 94% inclusive up to 600° F
AAA	95% to 99% inclusive up to 750° F

Asbeston fabrics are available with resin finishes, and with coatings of aluminum and aluminum foil. We

have also created and patented the lustre-white finish. This finishing technique applied to the surface of Asbeston fabrics produces a white, bright, smooth texture. Since it is not applied, but is part of the fabric itself, the lustre-white finish helps Asbeston keep its good looks far longer than conventional fabrics.

Here are some of the types and uses of Asbeston yarns, fabrics and tapes:

Asbeston multi-ply weaving, braiding and special yarns.

Fabrics for use as insulation jacketing, safety clothing, gloves, mitts, fire-blankets, mechanical rubber goods, plastic laminates, flatwork ironer roll covers, home ironing board covers.

Asbeston electrical insulation tapes.

Asbestall fabrics with an exceptionally smooth surface for use in dry cleaning and laundry press covers.

Asbeston comes in 50 and 100 yard rolls, in widths to 60 inches, as well as tape widths.

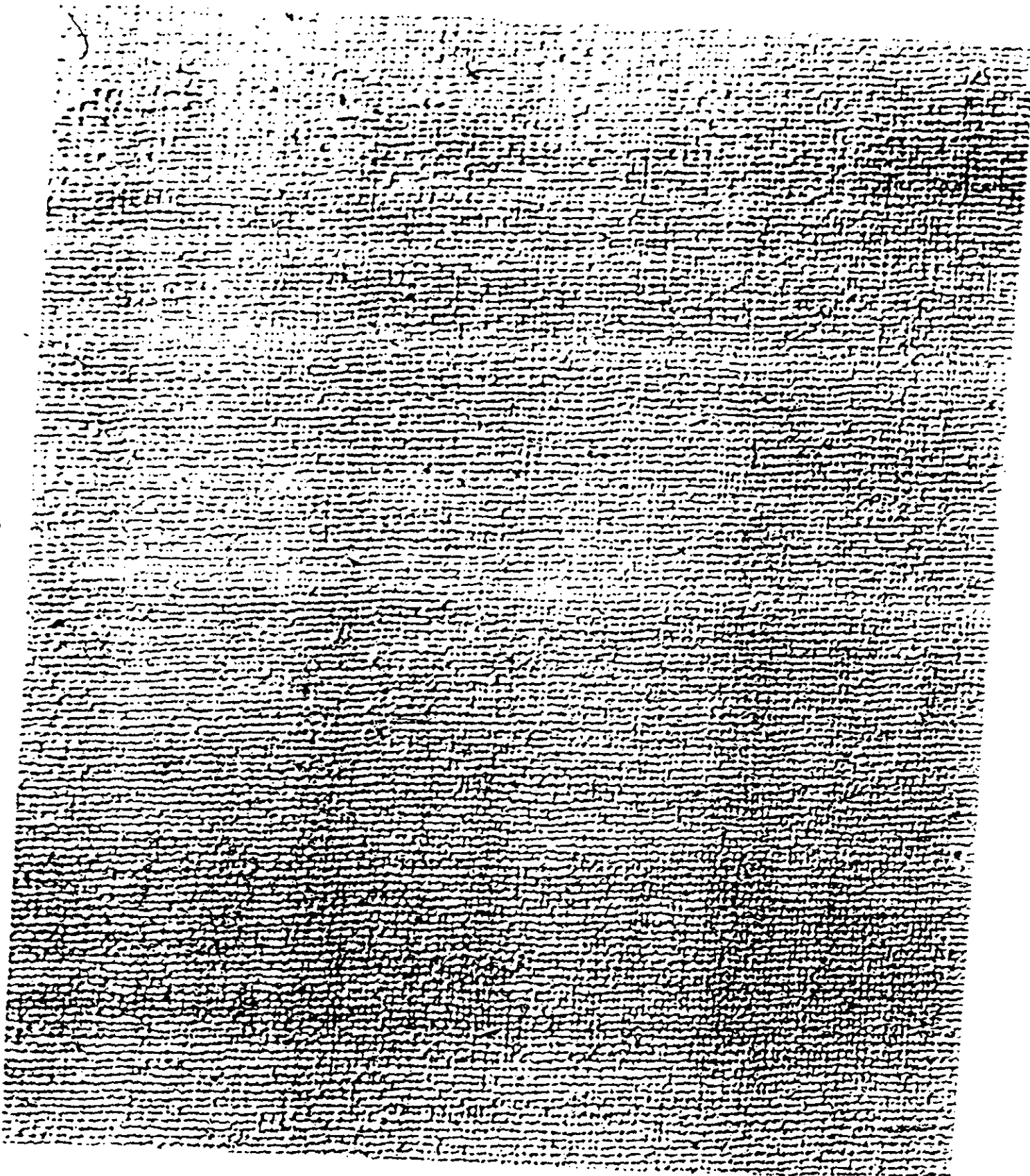
The charts show typical Asbeston types and weights.

We welcome the opportunity to engineer yarns and fabrics to your specifications.

United States Rubber Company sales offices		
Chicago, Ill.	4135 So. Pulaski Road	312-CL4-5700
Dalton, Ga.	P.O. Box 371	404-278-8867
Los Angeles, Calif.	5910 Telegraph Road	213-723-9971
New York, N.Y.	1230 Avenue of the Americas	212-C17-5000
Reading, Pa.	American Bank & Trust Co. Bldg.	215-376-8081
Windsor, S.C.	350 Columbia Road	803-635-4651



Textile Administrative Center
United States Rubber Company
380 Columbia Rd., Winstonsboro, S.C. 29180



Fabrics for safety clothing, gloves, mitts, fire blankets					
Styles	ATI No.	Wt. lb. per sq. yd.	Gauge	Grade	Weave
S/5670		.72	.022"	U	Plain
S/3620		.80	.022"	U	Plain
S/1585B	19H130	1.20	.043"	U	Herringbone
US225	36P10	2.25	.072"	C-U-AA-AAA	Plain
US250	40P10	2.50	.078"	C-U-AA-AAA	Plain
US36P10	36P10	2.25	.072"	C-U-AA-AAA	Plain
US40P10	40P10	2.50	.078"	C-U-AA-AAA	Plain

Fabrics for laundry press, flatwork roll, ironing board, and dry cleaning press covers				
Styles	Wt. lbs. sq. yd.	Gauge	Grade	Weave
S/1134	.72	.033"	U	Plain
S/1580PDC	.73	.025"	U	Plain
S/6990A-IAR	.80	.027"	U	B-Twill
S/1022B-SR01	.81	.021"	U	Sateen
S/885A-IAR	.92	.024"	U	B-Twill
S/885A-APF-COS16	1.07	.027"	U	B-Twill
S/885A-APF-25	1.17	.027"	U	B-Twill
S/2575-APF-10	1.28	.040"	U	B-Twill
S/1143-PCR-25	1.72	.039"	U	B-Twill

Fabrics for insulation jacketing					
Style	ATI No.	Wt. lbs. sq. yd.	Grades	Gauge	Weave
6555	12P18	.75	U	.023"	Plain
6555-ALMF		.94	U	.025"	Plain
S/799A	22P22	1.40	U	.050"	Plain
S/3995A		1.40	U	.040"	Plain
US18P10G*	18P10G	1.10	U	.056"	Plain
US22P10G*	22P10G	1.40	U	.065"	Plain
US36P10	36P10	2.25	C-U-AA-AAA	.072"	Plain
US40P10	40P10	2.50	C-U-AA-AAA	.078"	Plain

*Asbestos glass combination

Electrical insulation fine tapes									
Style	Gauge	Grades	Yds. / Roll	Yds. per lb. by width					
				1/2"	3/4"	1"	1 1/2"	1 3/4"	2"
S/520	.010"	C	27	122	86	66	53	44	34
S/525	.010"	U	36	122	91	70	59	49	36
S/527	.015"	U	36	97	68	53	43	37	26
S/529	.020"	U	36	73	53	42	34	29	22

Fabrics for plastic laminates					
Style	ATI No.	Wt. lbs. sq. yd.	Gauge	Grade	Weave
S/672		.52	.027"	U	Plain
S/1437		.67	.026"	U	Plain
S/1619		.90	.033"	U	Plain
S/664		1.05	.031"	U	B-Twill
US26P12	26P12	1.65	.050"	U-AA-AAA	Plain
US26P14	26P14	1.65	.050"	U-AA-AAA	Plain
US36P10	36P10	2.25	.072"	C-U	Plain

Special light weight yarns			Plain heavy weight yarns		
Size	Approx. yds. lb.	Grade	Size	Approx. yds. lb.	Grade
22/2	1000	U	8 Cut	800	C-U-AA
27/2	1300	U	10 Cut	1000	C-U-AA
27/2/2	620	U	12 Cut	1200	C-U-AA
42/2	1900	U	14 Cut	1400	C-U-AA
25ARI	2500	Special	16 Cut	1600	C-U-AA
22ANI	2200	Special	18 Cut	1800	C-U-AA
27/2ANI	1260	AA	1020	500	C-U-AA
38ANI	3800	U	1030	333	C-U-AA
Y-250-A*	2250	Special	1050	200	C-U-AA

*Glass inserted yarn