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December 5, 1995

Via CM/RRR P 851 158 101Mr. Peter A. Kraus
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281Re: Cause No. 93-3625-I; *Helen Gambrell, Individually and as the Special Administratrix of the Estate of Robert Gambrell, Deceased v. The Aber Co., et al.*; In the 162nd Judicial District Court of Dallas County, Texas

Dear Peter:

SUPPLEMENTAL ANSWER

The Rockbestos Company, in compliance with the Court's oral pronouncement of October 30, 1995, and in response to the plaintiff's letter of October 30, 1995, provides the following supplemental answer:

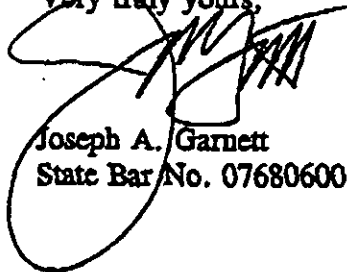
Subject to the general and specific objections asserted in Rockbestos' initial and supplemental answers to plaintiff's interrogatories, Cerro Wire and Cable Co., Inc., which was incorporated in 1982, never manufactured wire and cable containing asbestos. Rockbestos is the successor in interest to another corporation with a similar name, Cerro Corporation and its division, the Cerro Wire & Cable Co. These entities manufactured and sold wire and cable products, including some appliance and fixture wire, which contained bonded, saturated and encapsulated chrysotile asbestos, throughout the 1970s up until approximately 1983.

In its supplemental answers to interrogatories, Rockbestos identified 27 types of appliance and fixture wire which it manufactured over time. No other additional information regarding Rockbestos' appliance and fixture wire is available at this time. Some of these types of appliance and fixture wire would have been manufactured and marketed by the older Cerro entities, at various times and in quantities dependent upon customer demand, between 1970 and 1983. To the extent that documents may exist which might identify additional types of fixture

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and appliance wire, those documents have previously been made available to the plaintiff for inspection and remain available, upon reasonable notice and at reasonable times, at Rockbestos' document storage facility at Windsor Locks, Connecticut.

Very truly yours,



Joseph A. Garnett
State Bar No. 07680600

JAG:cmc
VAG/GAMBERELL/KRAUS.03

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FIRM OR COMPANY NAME: Baron & Budd, P.C.

TELEPHONE NUMBER: (214) 521-3605

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(HARD COPY OF THIS TRANSMISSION WILL _ WILL NOT ☒ BE SENT BY REGULAR MAIL)

FROM: Joseph A. Garnett

NOTE: Attachment: Supplemental Answer dated 12/5/95 in *Gambrell* case

McFALL, SHERWOOD & SHEEHY CONFIRMATION REQUESTED:

Date: _____ Time: _____

Charge to File No.: 106/WESTRN 10-015 (4663)

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