

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

ETTA WALLACE, personal	)	Case No. C 84-7864
representative of the Estate	)	[Hon. Nicholas J. Walinski]
of Fred A. Wallace, et al.,	)	
	)	RESPONSE OF DEFENDANT THE
	)	B.F. GOODRICH COMPANY TO
Plaintiffs,	)	PLAINTIFFS' REQUESTS FOR
	)	PRODUCTION OF DOCUMENTS
	)	DIRECTED TO ALL DEFENDANT
vs.	)	<u>PVC MANUFACTURERS</u>
	)	
	)	
CHRYSLER PLASTIC PRODUCTS	)	
CORPORATION, et al.,	)	
	)	
Defendants.	)	

-oOo-

Now comes defendant The B.F. Goodrich Company, and for its response to plaintiffs' requests for production of documents, states as follows:

1. All records of sales, direct or indirect, of Polyvinyl Chloride (PVC) resin from you to Chrysler Plastic Products Corporation (Chrysler) between January 1, 1967 and December 31, 1980.

ANSWER:

Sales records for the period from 1967 to 1973 are not available, see Response to Interrogatory No. 4. See Attachment No. 1 for sales records for the period from 1974 to 1980.

2. All documents indicating the extent to which PVC resin sales to Chrysler during the time period indicated above,

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represented sales of PVC resin manufactured in the: (a) suspension; (b) emulsion; (c) bulk; or, (d) solution process.

ANSWER:

See Attachment No. 2 for summary of information contained in Attachment No. 1.

3. All documents indicating the extent to which PVC resin sales to Chrysler during the time period specified in request number 1, were of (a) Homopolymer; (b) copolymer; or, (c) terpolymer.

ANSWER:

See Attachment No. 1. All but the following products were homopolymers:

Product No.	
00427 000	Copolymer
00139 017	Copolymer
00576 000	Copolymer

4. All written documents indicating, with respect to PVC resin sold to Chrysler during the time period specified above, the size (in microns) of the resin sold.

ANSWER:

See Attachment Nos. 3 and 4.

5. All written documents indicating the results of any tests done on any PVC resin by you or any other entity to determine the concentration (in parts per million) of residual vinyl chloride monomer in PVC resin of the type sold to Chrysler during the time period specified in request number 1.

ANSWER:

See Response to Interrogatory No. 16, files are being searched for documents responsive to this request and if such documents are located, this response will be supplemented in a timely fashion.

6. All Material Safety Data Sheets published by you prior to January 1, 1986, relating to any PVC resin manufactured by you.

ANSWER:

Objection, any Material Safety Data Sheet published subsequent to 1980, the last date of exposure in this case, is irrelevant. See Attachment No. 3.

7. All documents in your possession indicating the dates of manufacture and the dates of shipment of PVC resin sold to Chrysler.

ANSWER:

Specific records detailing this information are not maintained. Computerized sales records from which this information would be obtained only go back five years. Other sources of information are being searched, and the answers will be supplemented if this information is obtained.

8. All written results of any testing done on the PVC resin identified in the prior request to determine the concentration of residual vinyl chloride monomer.

ANSWER:

See response to Production Request No. 5.

9. All documents sent by you to the Occupational Safety & Health Administration, relating, in any way, to PVC.

ANSWER:

Objection, the request is over broad and burdensome as such information would be readily available to plaintiffs upon request to OSHA. Furthermore, such documents, should any exist, are not relevant to the resin sold by defendant The B.F. Goodrich Company to Chrysler.

10. All documents reporting or summarizing efforts taken by you, at any time since January 1, 1967 to reduce the percentage of residual vinyl chloride monomer in PVC resin manufactured by you.

ANSWER:

See Response to Interrogatory No. 19 as it relates to reduction of vinyl chloride monomer in the resin.

11. Each and every document sent to Chrysler, informing Chrysler of any known or potential human health hazards relating to exposure or over exposure to vinyl chloride monomer.

ANSWER:

See response to Interrogatory No. 14.

STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

ETTA WALLACE, personal)
representative of the Estate)
of Fred A. Wallace, et al.,)

Plaintiffs,)

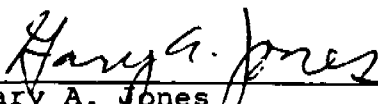
vs.)

CHRYSLER PLASTIC PRODUCTS)
CORPORATION, et al.,)

Defendants.)

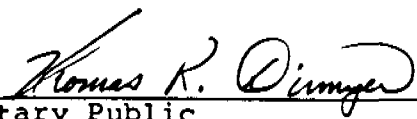
CASE NO. C 84-7864

I, Gary A. Jones, being duly sworn, state that I am Manager, Litigation of The B.F. Goodrich Company; that the foregoing Answers to Plaintiffs' Requests for Production of Documents are not based upon my personal knowledge but are based upon information contained in regular business records and upon information received from other employees; and that the foregoing Answers to Plaintiffs' Requests for Production of Documents are true and correct to the best of my knowledge and information.



Gary A. Jones
Manager, Litigation
The B.F. Goodrich Company
6100 Oak Tree Blvd.
Cleveland, Ohio 44131
(216) 447-6226

Subscribed and sworn to before me this 25th day of
September, 1986.



Notary Public
THOMAS R. DIMMYER, Notary Public
STATE OF OHIO
My Commission Expires Dec. 2, 1989

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AS TO OBJECTIONS:

Of Counsel For Defendants
The BFGoodrich Co., The
Goodyear Tire & Rubber Co.,
Firestone Tire & Rubber Co.,
Conoco, Inc., Uniroyal, Inc.,
Union Carbide Corp., Diamond
Shamrock Corp., Tenneco, Inc.
and Occidental Chemical Corp.:

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Conoco, Inc., Uniroyal, Inc.,
Union Carbide Corp., Diamond
Shamrock Corp., Tenneco, Inc.
and Occidental Chemical Corp.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Responses to Plaintiff's Requests for Production of Documents Directed to all Defendant PVC Manufacturers was mailed by United States mail, postage prepaid, to Kirk J. Delli Bovi, Esq., attorney for plaintiff, at his office located at Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio 44870, and to defense counsel as set forth in the attached Schedule of Service this 2nd day of October, 1986.

Reggie Akkappa
An Attorney for Defendants
The Goodyear Tire & Rubber
Company, The BFGoodrich
Company, Firestone Tire &
Rubber Company, Conoco,
Inc., Uniroyal, Inc., Union
Carbide Corporation, Diamond
Shamrock Corp., Tenneco,
Inc. and Occidental Chemical
Corp.

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