a L.F.

PLAINTIFF'S EXHIBIT
GF-698

MENDES & MOUNT
27 WILLIAM STREET
NEW YORK, N. Y. 10005
(212) 344-7100

CABLES
"MENMOUNT" N. Y.
TELEX NO. WUI 620392 N. Y.

9454 WILSHIRE BOULEVARD
BEVERLY HILLS CALIF. 90212
(213) 278-4640

April 20, 1977

Mr. Edward F. McKiernan
GAF Corporation
140 West 51st Street
New York, New York 10020

Re: Asbestosis Cases
Our File: 246,332

Dear Ed:

It is essential that we advise Excess Underwriters of the degree of impairment, if any, to the underlying annual aggregate Products limits which may have occurred as a result of the settlement of various Asbestosis cases. You unquestionably appreciate that in order for us to intelligently advise our clients of their potential exposure herein, this information is a vital link in any future estimates that we may attempt to arrive at.

Therefore, I would appreciate your submitting to me an exhibit depicting the cases which have been settled wherein a contribution was made on behalf of GAF/Ruberoid, the year to which the loss was charged, and the total outstandings for said year. This information is necessary for all years of account during which our clients provided Excess Umbrella Liability Coverage.

In addition, it was my understanding as a result of our several discussions that you had completed, or was in the process of completing, an insurance profile reflecting the coverage that was available to GAF/Ruberoid for the several years involved in these losses. I would greatly appreciate your favoring me with a copy of said profile in order that we may have a complete picture of the areas of our clients' interests.

Insofar as the aggregate data is concerned, in the event you do not have that information but are aware that it is being developed by the primary insurer, then please favor us with the name of the individual with whom we should be in contact at the primary in order that we may secure that information directly from them.

In either event, please give the within request your preferred attention and favor me with a response at your very earliest convenience.

Many thanks for your continued courtesies and cooperation.

Very truly yours,

MENDES & MOUNT

By: W.R. Continanza

WRC/sba

[redacted]

Memorandum from

EDWARD D. TANENHAUS

In Gloucester only

South Bound Brook
— Keep them for only 7 years
Sales Invoices (No shipping records

Complete years 1970, 1971, 1972

Odd years

[redacted] 1967 (Jan, March, Dec)
1968 (nothing)
1969 (Jan. - July)

[redacted]

[redacted]

RGAF

Memorandum from

EDWARD D. TANENHAUS

Gloucester – 1970

1969 (part)
1968 (nothing)
1967 (nothing)
1966 (part)
1965 (everything)

Shipping records + will include invoice

Dave Flaherty –
Office Manager

(815) 726-2421

[redacted]

gaf memo:

FROM: Edward F. McKiernan
Insurance Manager

May 6, 1977

TO: [redacted]
Mr. Ed Tanenhaus

FROM: E. F. McKiernan

Attached you will find copy of letter we received from the attories handling claims for the Lloyd's of London in the US.

In an effort to be cooperative with these carriers, we have notified them on the status of our asbestosis cases from time to time with the limited information we have in our files.

I would like to meet with both of you to discuss what Mr. Continanza outlines in his letter. Perhaps the best way to resolve this is to have a meeting with him. I await your reply.

Edward McKiernan

EFMcK:lc

RECEIVED
MAY 9 1977
LEGAL

[redacted]

2462