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LAW OFFICES
BRANSON, FITZGERALD & HOWARD

A PROFESSIONAL CORPORATION
500 ALLERTON STREET
POST OFFICE BOX 2189
REDWOOD CITY, CALIFORNIA 94064
TELEPHONE (415) 365-7710

Attorneys for: SYNKOLOID COMPANY

ASBESTOS

JKC _____
WPL _____
BKH _____

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Ma ① Request Product of Documents - ident. ref

SUPERIOR COURT, STATE OF CALIFORNIA

CITY AND COUNTY OF SAN FRANCISCO

IN RE: SHIPYARD AND APPLICATOR
CASES (CLAPPER & BRAYTON)
CONSOLIDATED FOR DISCOVERY

② Add list of products to Dougo list for

No: 804416

construction interview *B*

ANSWERS OF SYNKOLOID
COMPANY TO INTERROGATORIES
PROPOUNDED BY PLAINTIFFS

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY : DEFENDANT SYNKOLOID COMPANY

SET NUMBER : TWENTY-EIGHT

NEAL BAKER,

Plaintiff,

No: 821066

vs.

ABEX CORPORATION, et al.,

Defendants.

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LOUIS BLEILY,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 804981

FRANK BOLDUC,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 823025

JAMES O. DAVIS,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 799977

ESTER DICKENS,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 300999

ROBERT EPPERSON,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 311399

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JAY WAYNE HARRIS,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 804985

ELMOND JOHNSON,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 800948

R. H. JOHNSON,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 803139

JOHNNIE MARCHAM,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 814472

HERBERT THOMPSON,

Plaintiff,

vs.

ABEX CORPORATION, et al.,

Defendants.

NO: 804476

1 PENI TUFONO,

2 Plaintiff,
3 vs.

NO: 818696

4 ABEX CORPORATION, et al.,
5 Defendants.

6 CLARENCE TRULL,

7 Plaintiff,
8 vs.

NO: 800945

9 ABEX CORPORATION, et al.,
10 Defendants.

11 MOSES PARKER,

12 Plaintiff,
13 vs.

NO: 802061

14 ABEX CORPORATION, et al.,
15 Defendants.

16 CLINTON DICKSON,

17 Plaintiff,
18 vs.

NO: 803014

19 ABEX CORPORATION, et al.,
20 Defendants.

21 ///

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LAW OFFICES
1 BRANSON. FITZGERALD & HOWARD

A PROFESSIONAL CORPORATION
2 500 ALLERTON STREET
3 POST OFFICE BOX 2189
REDWOOD CITY, CALIFORNIA 94064
TELEPHONE (415) 365-7710

4 Attorneys for: SYNKOLOID COMPANY

5
6
7
8 SUPERIOR COURT, STATE OF CALIFORNIA
9 COUNTY OF SOLANO

10
11 IN RE: CLAPPER & BRAYTON
12 CONSOLIDATED FOR DISCOVERY
SHIPYARD AND APPLICATOR ASBESTOS
13 CASES CONSOLIDATED FOR DISCOVERY

MISC. NO: 959

ANSWERS OF SYNKOLOID COMPANY
TO INTERROGATORIES PROPOUNDED
BY PLAINTIFFS

14 PROPOUNDING PARTY: PLAINTIFFS

15 RESPONDING PARTY : DEFENDANTS

16 SET NUMBER : TWENTY-EIGHT

17 WILLIAM BOSTIC,

18 v.

NO: 86710

19 ABES CORPORATION, et al.,

20 Defendants.

21
22 GEORGE COOK,

23 v.

NO: 85882

24 ABEX CORPORATION, et al.,

25 Defendants.
26

1 WILEY UNDERWOOD,

2 vs.

NO: 85883

3 ABEX CORPORATION, et al.,

4 Defendants.

5 EARNEST WASHINGTON,

6 vs.

NO: 85637

7 ABEX CORPORATION, et al.,

8 Defendants.

9
10 JOHN O. TIMM,

11 vs.

NO: 85911

12 ABEX CORPORATION, et al.,

13 Defendants.

14
15 Defendant SYNKOLOID COMPANY herewith answers plaintiffs'
16 first set of interrogatories as follows. The information provided
17 herein is based upon information presently available to the SYNKOLOID
18 COMPANY. Since discovery and our investigation is still continu-
19 ing, this information is provided without prejudice to our present-
20 ing at a later time or introducing into evidence information ob-
21 tained subsequent to the date these interrogatory answers are
22 served. There are very few records available to SYNKOLOID COMPANY
23 at the present time due not only to its document retention destructio
24 program but also because there have been several sales of the com-
25 pany over the past several years and many of the company's records
26 have either been lost or misplaced or have been transferred to indi-
viduals or entities presently unknown.

1 ANSWER TO INTERROGATORY NO. 1: John P. Conroy, Corporate
2 Risk Director, Artra Group, 500 Central Avenue, P.O. Box 8903,
3 Northfield, IL 60093 (312) 441-6650; William Reidy, Artra Group;
4 Lindburgh Wong, Control Chemist, Synkoloid Company, 5928 South Gar-
5 field Avenue, Commerce, CA; Frank A. Scanland, Vice President,
6 Synkoloid Company; Henry D. Rome, attorney for Synkoloid Company.

7 ANSWER TO INTERROGATORY NO. 2: Yes.

8 (a) The Synkoloid Company

9 (b) Colorado

10 (c) 5928 South Garfield Avenue, Commerce, CA.

11 (d) Objection - this question is overbroad and

12 requests information which is irrelevant as, to our knowledge, no
13 asbestos of any kind has been used in any Synkoloid product since at
14 least June of 1977 and, probably earlier. Without waiving said ob-
15 jection, the answer is unknown with respect to the time periods that
16 asbestos was utilized.

17 (e) Privately.

18 ANSWER TO INTERROGATORY NO. 3: N.A.

19 ANSWER TO INTERROGATORY NO. 4: None to our knowledge.

20 ANSWER TO INTERROGATORY NO. 5: None to our knowledge.

21 ANSWER TO INTERROGATORY NO. 6: Not to our knowledge.

22 ANSWER TO INTERROGATORY NO. 7: Objection - overbroad and
23 irrelevant with respect to the time period after asbestos was removed
24 from our products. For the time period prior to that, the answer is
25 "no."

26 ///

1 ANSWER TO INTERROGATORY NO. 8:

- 2 (a) 5928 South Garfield, Commerce, California.
3 (b) Frank A. Scanland, Vice President.
4 (c) No.

5 ANSWER TO INTERROGATORY NO. 9:

- 6 (a) through (h) - No.
7 (i) Yes - approximately between 1949 and 1977.

8 ANSWER TO INTERROGATORY NO. 10:

- 9 (a)-(b) Yes - between approximately 1949 and 1977.
10 (c)-(d) Objection - vague and ambiguous. Without
11 waiving said objections, we believe the answer is no.
12 (e)-(h) Yes - between approximately 1949 and 1977.

13 ANSWER TO INTERROGATORY NO. 11:

- 14 (a) Tex-Wall
15 (b) Approximately 1949
16 (c) August 1975
17 (d) Objection as calling for trade secret information. Without waiving said objection, this product utilized 3.33%
18 of 35 asbestos.
19 (e) Unknown except we believe that it was in
20 powder form.
21 (f) Unknown except we believe it was designed to
22 provide texture to walls.
23 (g) Unknown.
24 (h) The Synkoloid Company
25 (i) Unknown
26 (j) None to our knowledge.
(k) Unknown.
(l) We believe so.
(i) Unknown.
(ii) Unknown.
(iii) No.
(m) N/A
(n) Unknown.
(o) Yes. Approximately August 1975.
(p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the Arera
Group in Northfield, Illinois.
(a) Eze-Tex.
(b) Approximately 1949.
(c) Approximately September 1975.
(d) Objection as calling for trade secret information. Without waiving said objection, this product contained approximately 4.89% of 7-RF-02 asbestos.

- 1 powder form. (e) Unknown although it is believed this was in
2 for walls. (f) We believe its purpose was to provide texture
3 (g) Unknown.
4 (h) The Synkoloid Company.
5 (i) Unknown.
6 (j) None to our knowledge.
7 (k) Unknown.
8 (l) We believe so.
9 (i) Unknown.
10 (ii) Unknown.
11 (iii) No.
12 (m) N/A
13 (n) Unknown.
14 (o) Yes. Approximately August 1975.
15 (p) Several boxes of records pertaining to the
16 Synkoloid Company all in the possession of John Conroy with the
17 Artra Group in Northfield, Illinois.
18 (a) Triple Duty Joint Compound.
19 (b) Approximately 1950
20 (c) Approximately December 1975
21 (d) Objected to as calling for trade secret infor-
22 mation. Without waiving said objection, this product contained
23 3.98% 7-RF-02 asbestos.
24 (e) Unknown although we believe that it was in
25 powder form.
26 (f) Unknown although we believe its purpose was to
prepare walls of houses.
(g) Unknown.
(h) The Synkoloid Company.
(i) Unknown.
(j) None to our knowledge.
(k) Unknown.
(l) We believe so.
(i) Unknown.
(ii) Unknown.
(iii) No.
(m) N/A
(n) Unknown.
(o) Yes - see (c) above.
(p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.
(a) Synko Topping.
(b) Approximately 1950.
(c) Approximately July 1975
(d) Objected to as calling for trade secret infor-
mation. Without waiving said objection, this product contained

1 5.98% 7-RF-02 asbestos.

2 (e) Unknown although we believe it was in powder form.

3 (f) Unknown although we believe its purpose was to repair walls of houses.

4 (g) Unknown.

5 (h) The Synkoloid Company.

6 (i) Unknown.

7 (j) None to our knowledge.

8 (k) Unknown.

9 (l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

10 (p) Several boxes of records pertaining to the Synkoloid Company all in the possession of John Conroy with the Artra Group in Northfield, Illinois.

11 (a) Prime 'X' Fill

12 (b) Approximately 1960.

13 (c) Approximately September 1975.

14 (d) Objected to as calling for trade secret information. Without waiving said objection, this product contained 4.83% 7-RF-02 asbestos.

15 (e) Unknown although we believe it was in powder form.

16 (f) Unknown although we believe its purpose was to repair walls of houses.

17 (g) Unknown.

18 (h) The Synkoloid Company.

19 (i) Unknown.

20 (j) None to our knowledge.

21 (k) Unknown.

22 (l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

23 (p) Several boxes of records pertaining to the Synkoloid Company all in the possession of John Conroy with the Artra Group in Northfield, Illinois.

24 (a) Snohide

25 (b) Approximately 1962.

26 (c) Approximately October 1975.

(d) Objected to as calling for trade secret informa-

1 tion. Without waiving said objection, this product contained 5.98%
2 7-RF-02 asbestos.

3 (e) Unknown although we believe it was in powder
4 form.

5 (f) Unknown although we believe its purpose was to
6 be a roof coating.

7 (g) Unknown.

8 (h) The Synkoloid Company.

9 (i) Unknown.

10 (j) None to our knowledge.

11 (k) Unknown.

12 (l) We believe so.

13 (i) Unknown.

14 (ii) Unknown.

15 (iii) No.

16 (m) N/A

17 (n) Unknown.

18 (o) Yes - see (c) above.

19 (p) Several boxes of records pertaining to the
20 Synkoloid Company all in the possession of John Conroy with the
21 Artra Group in Northfield, Illinois.

22 (a) Plastibond.

23 (b) Approximately 1950.

24 (c) Approximately February 1976.

25 (d) Objected to as calling for trade secret informa-
26 tion. Without waiving said objection, this product contained 1.22%
7-RF-02 asbestos.

(e) Unknown although we believe it was in paste form.

(f) Unknown although we believe its purpose was for
texturizing and perhaps sealing walls.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

(p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.

(a) Surface Conditioner.

(b) Approximately 1950.

(c) Approximately August 1976.

(d) Objected to as calling for trade secret informa-

1 gion. Without waiving said objection, this product contained 2.24%
2 7-RF-02 asbestos.

3 (e) Unknown although we believe it was provided in
4 paste form.

5 (f) Unknown although we believe its purpose was to
6 condition walls for painting.

7 (g) Unknown.

8 (h) The Synkoloid Company.

9 (i) Unknown.

10 (j) None to our knowledge.

11 (k) Unknown.

12 (l) We believe so.

13 (i) Unknown.

14 (ii) Unknown.

15 (iii) No.

16 (m) N/A

17 (n) Unknown.

18 (o) Yes - see (c) above.

19 (p) Several boxes of records pertaining to the
20 Synkoloid Company all in the possession of John Conroy with the
21 Artra Group in Northfield, Illinois.

22 (a) Vinyl Prep Mix.

23 (b) Approximately 1962.

24 (c) Approximately June 1977.

25 (d) Objected to as calling for trade secret informa-
26 tion. Without waiving said objection, this product contained ap-
proximately .4953% asbestos which was included in a P-4 powder base.

(e) Unknown although we believe this was provided in
paste form.

(f) Unknown although we believe its purpose was to
repair walls of houses.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) See (c) above.

(p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.

(a) Flexi-Patch.

(b) Approximately 1960.

(c) Approximately August 1976.

1 (d) Objected to as calling for trade secret informa-
2 tion. Without waiving said objection, this product contained .92%
3 7-RF-02 asbestos.

4 (e) Unknown although we believe it was provided in
5 paste form.

6 (f) Unknown although we believe its purpose was to
7 repair walls of houses.

8 (g) Unknown.

9 (h) The Synkoloid Company

10 (i) Unknown.

11 (j) None to our knowledge.

12 (k) Unknown.

13 (l) We believe so.

14 (i) Unknown.

15 (ii) Unknown.

16 (iii) No.

17 (m) N/A

18 (n) Unknown.

19 (o) Yes - see (c) above.

20 (p) Several boxes of records pertaining to the
21 Synkoloid Company all in the possession of John Conroy with the
22 Artra Group in Northfield, Illinois.

23 (a) Stucco 'N' Cement Patch.

24 (b) Approximately 1950.

25 (c) Approximately August 1975.

26 (d) Objected to as calling for trade secret informa-
tion. Without waiving said objection, this product contained ap-
proximately .81% of 7-35 asbestos.

(e) Unknown although we believe this was provided
in powder form.

(f) Unknown although we believe its purpose was to
patch stucco and cement.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

(p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.

(a) Tex Add.

(b) Approximately 1950.

(c) Approximately December 1975.

(d) Objected to as calling for trade secret information. Without waiving said objection, this product contained 57.14% #35 asbestos.

(e) Unknown although we believe it was provided in powder form.

(f) Unknown although we believe its purpose was to be added to paint for texture.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

(p) Several boxes of records pertaining to the Synkoloid Company all in the possession of John Conroy with the Artra Group in Northfield, Illinois.

(a) Prime 'N' Seal.

(b) Approximately 1952.

(c) Approximately August 1976.

(d) Objected to as calling for trade secret information. Without waiving said objection, this product contained 1.33% 7-TF-1 asbestos.

(e) Unknown although we believe it was provided in paste form.

(f) Unknown although we believe its purpose was to prepare walls for painting.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown

(ii) Unknown

(iii) No.

(m) N/A

(n) Unknown

(o) Yes - see (c) above.

(p) Several boxes of records pertaining to the Synkoloid Company all in the possession of John Conroy with the Artra Group in Northfield, Illinois.

(a) Kool-Kap.

(b) Approximately 1965.

(c) Approximately January 1976.

1 (d) Objected to as calling for trade secret informa-
2 tion. Without waiving said objection, this product contained 4.10%
7-RF-02 asbestos.

3 (e) Unknown although we believe it was provided in
paste form.

4 (f) Unknown although we believe its purpose was to
be a roof coating.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

11 (p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.

12 (a) Vinyl Tex-Wall.

13 (b) Approximately 1972.

14 (c) Approximately January 1976.

15 (d) Objected to as calling for trade secret informa-
tion. Without waiving said objection, we do not know what percentage
of this product contained asbestos, only that this product replaced
Plasticbond, mentioned above.

16 (e) Unknown although we believe it was provided in
past form.

17 (f) Unknown although we believe its purpose was to
texturize and perhaps seal walls.

(g) Unknown.

(h) The Synkoloid Company.

(i) Unknown.

(j) None to our knowledge.

(k) Unknown.

(l) We believe so.

(i) Unknown.

(ii) Unknown.

(iii) No.

(m) N/A

(n) Unknown.

(o) Yes - see (c) above.

24 (p) Several boxes of records pertaining to the
Synkoloid Company all in the possession of John Conroy with the
Artra Group in Northfield, Illinois.

26 ANSWER TO INTERROGATORY NO. 12: Unknown. We believe the

BRANSON, FITZGERALD & HOWARD
ATTORNEYS AT LAW
500 ALLESTREE, SUITE 11
POST OFFICE BOX 2189
HOLMWOOD CITY, CALIFORNIA 92344
TELEPHONE (619) 365-7710

1 company distributed the products themselves with their own sales
2 people.

3 ANSWER TO INTERROGATORY NO. 13: As mentioned in the pre-
4 face to these interrogatory answers, this company has been sold on
5 several occasions over the years and there are only several boxes of
6 documents to our knowledge in existence pertaining to the company's
7 period when it manufactured and sold asbestos-containing products.
8 Those documents are in the custody of John Conroy with the Artra
9 Group in Northfield, Illinois.

10 ANSWER TO INTERROGATORY NO. 14: None to our knowledge.

11 ANSWER TO INTERROGATORY NO. 15: None to our knowledge.

12 ANSWER TO INTERROGATORY NO. 16: None known although we
13 believe it must have been sometime in 1949 as that is when the first
14 asbestos-containing product was manufactured by this company accord-
15 ing to the information we have.

16 ANSWER TO INTERROGATORY NO. 17: Objection - this question
17 is vague, ambiguous and unintelligible. Without waiving said ob-
18 jection, this defendant did purchase a type of asbestos described in
19 response to Interrogatory No. 11 above from unknown suppliers. That
20 asbestos was utilized as indicated in our response to Interrogatory
21 No. 11.

22 ANSWER TO INTERROGATORY NO. 18: Unknown.

23 ANSWER TO INTERROGATORY NO. 19: Unknown with the exception
24 that all products listed in our answer to Interrogatory No. 11
25 identified as a powder we believe to have been packaged in bags while
26 those described as being in paste form we believe to have been pro-

1 vided in cans.

2 ANSWER TO INTERROGATORY NO. 20: No.

3 ANSWER TO INTERROGATORY NO. 21: Unknown.

4 ANSWER TO INTERROGATORY NO. 22: N/A

5 ANSWER TO INTERROGATORY NO. 23: Although we assume that
6 Synkoloid's name was on the products it manufactured, we cannot state
7 that for a fact as we do not know.

8 ANSWER TO INTERROGATORY NO. 24: Objection - assumes facts
9 not in evidence. Without waiving said objection, the response is
10 "unknown" at the present time due to the lack of records, turnover
11 of personnel and sales of company over the past twenty years.

12 ANSWER TO INTERROGATORY NO. 25: Unknown at the present time
13 due to the lack of records, turnover of personnel and sales of com-
14 pany over the past twenty years.

15 ANSWER TO INTERROGATORY NO. 26: Objection - assumes facts
16 not in evidence. Without waiving said objection, unknown at the
17 present time due to the lack of records, turnover of personnel and
18 sales of company over the past twenty years.

19 ANSWER TO INTERROGATORY NO. 27: Objection - assumes facts
20 not in evidence. Without waiving said objection, unknown at the
21 present time due to the lack of records, turnover of personnel and
22 sales of company over the past twenty years.

23 ANSWER TO INTERROGATORY NO. 28: Unknown at the present
24 time due to the lack of records, turnover of personnel and sales of
25 company over the past twenty years.

26 ANSWER TO INTERROGATORY NO. 29: Please see response to

BRANSON, FITZG. D & HOWARD
A PUBLIC ACCOUNTING FIRM
500 ALHAMBRA STREET
POST OFFICE BOX 2109
HAWAII CITY, CALIFORNIA 96844
TELEPHONE (415) 365-7700

1 Interrogatory No. 28 above.

2 ANSWER TO INTERROGATORY NO. 30: Same answer as set forth
3 in response to Interrogatory No. 28 above.

4 ANSWER TO INTERROGATORY NO. 31: Same answer as set forth
5 in response to Interrogatory No. 28 above.

6 ANSWER TO INTERROGATORY NO. 32: None to our knowledge.

7 ANSWER TO INTERROGATORY NO. 33: Not to our knowledge.

8 ANSWER TO INTERROGATORY NO. 34: Same answer as set forth
9 in response to Interrogatory No. 28 above. We do believe, however,
10 that the company has belonged in the past to the National Paint and
11 Coatings Association which may, or may not, have had anything to do
12 with this subject.

13 ANSWER TO INTERROGATORY NO. 35: Not to our knowledge.

14 ANSWER TO INTERROGATORY NO. 36: Not to our knowledge.

15 ANSWER TO INTERROGATORY NO. 37: Not to our knowledge.

16 ANSWER TO INTERROGATORY NO. 38: Not to our knowledge.

17 ANSWER TO INTERROGATORY NO. 39: Same answer as set forth
18 in response to Interrogatory No. 28 above.

19 ANSWER TO INTERROGATORY NO. 40: Same answer as set forth
20 in response to Interrogatory No. 28 above.

21 ANSWER TO INTERROGATORY NO. 41: Same answer as set forth
22 in response to Interrogatory No. 28 above.

23 ANSWER TO INTERROGATORY NO. 42: Same answer as set forth
24 in response to Interrogatory No. 28 above.

25 ANSWER TO INTERROGATORY NO. 43: Yes.

26 ANSWER TO INTERROGATORY NO. 44: To the extent that we have

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such information, the same is included on attached Exhibit A.

ANSWER TO INTERROGATORY NO. 45: Unknown.

ANSWER TO INTERROGATORY NO. 46: Unknown.

ANSWER TO INTERROGATORY NO. 47: Same answer as set forth
in response to Interrogatory No. 23 above.

ANSWER TO INTERROGATORY NO. 48: Same answer as set forth
in response to Interrogatory No. 28 above.

BRANSON, FITZGERALD & HOWARD

By Henry D. Rome

Henry D. Rome
Attorneys for SYNKOLOID COMPANY

BRANSON, FITZGERALD & HOWARD
A PROFESSIONAL CORPORATION
900 ALLERTON STREET
REDWOOD CITY, CALIFORNIA 94063
TELEPHONE 968-7710

PROOF OF SERVICE BY MAIL - C.C.P. §1013a-2015

I, the undersigned, declare under penalty
That I am a United States citizen, over the age of ei
a party to the within cause or proceeding; that my bu
is 500 Allerton Street, Redwood City, CA 94063; that
forth below I served a true copy of Synkoloid Compa
to Plaintiffs' Interrogatories

by depositing said copy in the United States mail, in
California, in a sealed envelope, postage prepaid, ad

Jack K. Clapper, Esq.
Alan R. Brayton, Esq.
Clapper & Brayton
250 Bel Marin Keys Blvd.
Novato, CA 94947

At said time there was regular delivery of the United
between said places of deposit and address. Executed
California, on August 31, 1984


Regina Feitell

BRANSON, FITZGER & HOWARD
A PROFESSIONAL CORPORATION
500 ALLENTON STREET
REDWOOD CITY, CALIFORNIA 94063
TELEPHONE 868-7710

1 PROOF OF SERVICE BY MAIL - C.C.P. §1013a-2015.5

2 I, the undersigned, declare under penalty of perjury:
3 That I am a United States citizen, over the age of eighteen, and not
4 a party to the within cause or proceeding; that my business address
5 is 500 Allerton Street, Redwood City, CA 94063; that on the date set
6 forth below I served a true copy of Synkoloid Company's answers
7 to Plaintiffs' Interrogatories

8
9
10 by depositing said copy in the United States mail, in Redwood City,
11 California, in a sealed envelope, postage prepaid, addressed to:

12 Jack K. Clapper, Esq.
13 Alan R. Brayton, Esq.
14 Clapper & Brayton
15 250 Bel Marin Keys Blvd.
16 Novato, CA 94947

17
18
19
20
21
22
23
24 At said time there was regular delivery of the United States mail
25 between said places of deposit and address. Executed at Redwood City
26 California, on August 31, 1984



Regina Feitelberg