

ASA-1635

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particular legal theory, including but not limited to Restatement (Second) of Torts § 402A. In fact, LAQ denies that raw chrysotile fiber is an “asbestos product.”

The answers to the within Interrogatories are being made in regard to the time period of September 17, 1952, the date of LAQ’s incorporation, through June 30, 1986, the date on which LAQ ceased mining, milling and selling raw chrysotile asbestos fiber, and in accordance with applicable statutes, codes, laws, acts and judicial decisions.

The term “sophisticated purchaser” in these responses is used to mean a purchaser who knew or should have known of health hazards of asbestos.

GENERAL OBJECTIONS

1. LAQ objects generally to any interrogatory on the grounds and to the extent that they assume facts not in evidence, and on the further grounds that they are vague, overly broad, oppressive, unduly burdensome, excessive in number, neither relevant nor material to the subject matter of the litigation, and not calculated to lead to the discovery of admissible evidence.

2. LAQ objects to these Interrogatories to the extent that they seek to require it to respond on behalf of any other entity on the grounds that such interrogatories are overly broad, unduly burdensome and seek information that is neither relevant nor reasonably calculated to lead to discovery of admissible evidence.

3. LAQ objects to these Interrogatories to the extent that they seek to require it to provide information other than that which may be obtained through a reasonably diligent search of its records.

4. LAQ generally objects to any interrogatory, document request, definition or instruction that purports to require LAQ to respond to any discovery request in a manner or to an extent not required by the Ohio Rules of Court.

5. LAQ objects to these Interrogatories to the extent that they seek to require it to reveal confidential employee material, records or information. Therefore, LAQ reserves the right to seek a protective order submitting certain responses only on the condition that the plaintiffs agree in writing and undertake to maintain the confidential nature of certain trade secrets and other confidential employee, product or commercial information.

6. LAQ objects to these Interrogatories to the extent that they seek to require it to respond to questions or to identify or produce documents relating to times, events and other things beyond the subject matter of the Complaint, or outside of the period from 1952 to 1986, during which time LAQ commercially mined, milled, and sold chrysotile asbestos fiber.

7. LAQ objects to these Interrogatories to the extent that they seek to require it to produce and provide information, or to identify any documents or other tangible things prepared or obtained in anticipation of litigation or for trial where the plaintiffs have not made the showing of good cause required by the Ohio Rules of Court.

8. LAQ objects to these Interrogatories to the extent that they seek to require it to disclose any attorney-client privileged communications or information otherwise protected from discovery on the grounds of privilege. LAQ further objects insofar as the Interrogatories call for the production of documents that its attorneys have assembled, or may have become known to them, in the course of other litigation. Such requests are overly broad and violate the attorney work-product doctrine. LAQ will not supply information protected from disclosure by virtue of such doctrines or privileges and hereby asserts those doctrines and privileges with respect to each

Interrogatory. No response herein is, or shall be construed to be, a waiver of the protection provided by such doctrine or privilege.

10. LAQ hereby adopts the motions and objections of other defendants, and reserves the right to adopt future motions and objections, relating to Plaintiffs' Interrogatories.

11. LAQ objects to these Interrogatories to the extent that they seek to require it to gather and summarize information contained in voluminous papers that are already a matter of public record.

12. LAQ objects to these Interrogatories to the extent that they seek to require it to provide information which is equally available to the plaintiffs as to LAQ.

13. LAQ's failure to make any objection, either in these General Objections or in a specific response below, through inadvertence, ignorance of facts giving rise to such objection, or for any other reason, should not be considered a waiver of such objection.

SUBJECT TO the foregoing objections and limitations which are applicable to each of the numbered paragraphs of the Interrogatories, and subject to any documents being in existence and recoverable through a reasonably diligent search, LAQ further responds to the individual Interrogatories without waiver and with preservation of:

- a. The right to object to the use of any responses, or the subject matter thereof, on any ground in any proceedings in any action (including any trials);
- b. The right to object on any ground at any time to a demand or request for a further response to the discovery request or to any other interrogatories, documents, or other discovery proceedings involving or relating to the subject matter of the discovery requests herein responded to; and

- c. The right at any time to revise, correct, add to, supplement or clarify any of the responses to the individual Interrogatories.

OBJECTIONS TO DEFINITIONS

1. LAQ objects to plaintiff's definition of "Defendant", "You", "Your", and "Your company" to the extent that it includes entities that are not parties. LAQ further objects to this definition to the extent it includes former officers, directors, agents and employees over whom LAQ no longer has dominion and control. By way of further objection, the use of these definitions transforms plaintiffs' interrogatories and request for production into an overly broad, unduly burdensome fishing expedition and is, therefore, in violation of the Ohio Rules of Civil Procedure.

2. LAQ objects to plaintiff's definition of the words "document", "documents", and "written materials" to the extent it includes information protected by privilege, including the attorney-client and attorney work product privileges. LAQ further objects to this definition to the extent it includes documents which are no longer in LAQ's possession and which, consequently, cannot be produced. By way of further objection, LAQ objects to this definition to the extent it includes documents from entities which are not named defendants.

3. LAQ objects to plaintiff's definition of the words "person" and "persons" to the extent it includes entities that are not parties. LAQ further objects to this definition to the extent it includes former officers, directors, agents and employees over whom LAQ no longer has dominion and control. By way of further objection, the use of these definitions transforms plaintiffs' interrogatories and request for production into an overly broad, unduly burdensome fishing expedition and is, therefore, in violation of the Ohio Rules of Civil Procedure.

4. LAQ objects to plaintiff's definition of the words "medical advisory capacity" on the grounds that it is ambiguous, overly broad, vague, ill-defined, and not susceptible to precise response.

5. LAQ objects to plaintiff's definition of the words "research" and "research department" on the grounds that it is ambiguous, overly broad, vague, ill-defined, and not susceptible to precise response.

6. LAQ objects to plaintiff's definition of the words "medical department" and "safety department" on the grounds that it is ambiguous, overly broad, vague, ill-defined, and not susceptible to precise response.

7. LAQ objects to plaintiff's definition of the words "test" and "testing" to the extent it encompasses substances other than asbestos on the grounds that it is overly broad and irrelevant.

8. LAQ objects to plaintiff's definition of the words "product containing asbestos fibers," "asbestos containing products," "asbestos products," "products," or "asbestos materials" on the grounds that it is overly broad, vague, ill-defined and not susceptible to precise response.

INTERROGATORIES

1. For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include job title, length of time employed by Defendant and a year by year list of all other positions, titles, or jobs held when working for Defendant.

ANSWER:

LAQ objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and irrelevant to the extent that it seeks the identity of each individual who supplied information, no matter how insignificant or minute the information supplied.

Subject and to and without waiving the foregoing objections, Kevin McCaffrey, Secretary of Lac d'Amiante du Quebec, Ltee will certify these responses. However, since the answers to this set of interrogatories have been compiled over a period of years, it is quite impossible to list the name, address, employer and job position of every person who has been consulted or assisted in answering each interrogatory. However, in an effort to adequately respond to this question, information contained within certain answers to certain questions in this set of interrogatories was likely to have been secured directly or indirectly from former LAQ employees (some of whom are deceased), including but not limited to:

Gaston Verrault, former Vice President of Operations

Clement Bernier, former Vice President of Operations

Yvonnice Bolduc, former Director of Personnel and Industrial Relations

Roland Gagnon (deceased), former Sr. Vice President of Sales and Marketing

Andre Gauthier (deceased), former Senior Vice President of Operations

Michael Messel, former President

Lionel Piuze (deceased), former Vice President of Operations

Edward A. Farrell, former Manager and Director of Sales

1.1 Please identify all documents used, related to, or referred to in connection with the preparation of or answers to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome.

Subject to and without waiving the foregoing objections, to the extent documents have been used as the basis for interrogatory responses herein, such documents will be noted by references in the particular interrogatory response. However, as information contained in answers to this set of interrogatories has been compiled over a period of years, it is quite impossible to identify each document referred to or related to these answers. Documents formerly in the possession of LAQ which relate to or may relate to LAQ's

former mining, milling and sale of raw chrysotile asbestos are in the custody of LAQ's national counsel, Porzio, Bromberg & Newman, P.C. at the following location:

**Porzio, Bromberg & Newman
100 Southgate Parkway
Morristown, NJ 07962
Telephone (973) 538-4000
Attn: Kenneth R. Meyer, Esq.**

2. Please state whether or not Defendant is a corporation. If so, please state:
- (a) Your correct corporate name;
 - (b) The state of your incorporation;
 - (c) The address of your principal place of business;
 - (d) Your registered agent for service in the state of Ohio;
 - (e) For each Defendant claiming that this Court lacks personal jurisdiction, list year by year the total amount of income received by Defendant from entities in Ohio, any and all years that Defendant, as defined, has been licensed to do business in Ohio, and any real property owned at any time by Defendant or its present or past subsidiaries.

ANSWER:

Defendant's correct corporate name is Lac d'Amiante du Quebec, Ltee. Defendant is incorporated in Delaware and while it was actively involved in the asbestos mining business, its principal place of business was located in Black Lake, Quebec, Canada and thereafter in New York City. LAQ's current principal place of business is Phoenix, Arizona. Defendant does not have a registered agent for service of process in the state of Ohio.

3. State Defendant's complete corporate or business history, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs. In addition:

- (a) if Defendant or any of its predecessors or subsidiaries at any time purchased, assumed, or in any other manner acquired ANY of the assets and/or liabilities of any corporation or entity at any prior time engaged in any aspect of the placing of asbestos-containing products into the stream of commerce or the insuring of asbestos-related risks, then please state the following as to each acquisition:
- (b) the name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- (c) the manner by which each such corporation, entity or interest therein, was acquired (e.g., merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (d) the date of each such acquisition;
- (e) the state in which each such acquisition was effected;
- (f) the state law governing each such acquisition if specified by contract;
- (g) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (h) identify each document reflecting or related to the history and/or transaction(s) set forth in answer to this Interrogatory.

ANSWER:

LAQ objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is also without relevant time limitation.

Subject to and without waiving the foregoing objections, Lac d'Amiante du Quebec, Ltee, (LAQ) states that Lake Asbestos of Quebec, Ltd. was incorporated on September 17, 1952 in the state of Delaware. Lake Asbestos of Quebec, Ltd. changed its name to Lac d'Amiante du Quebec, Ltee in 1978. LAQ's corporate status has never lapsed or terminated.

LAQ has never had a subsidiary which mined, milled, processed, sold or distributed raw asbestos fiber, or manufactured, sold or distributed any asbestos-containing products.

LAQ currently has two wholly-owned subsidiaries. The first is Lake Asbestos of Quebec, Limited ("Lake"). Lake was incorporated in the state of Delaware on January 16, 1978, to preserve and protect the corporate name Lake Asbestos of Quebec.

In 1986, a wholly-owned subsidiary, Lac d'Amiante du Quebec ("LAC") was created, to which LAQ sold all of its mining assets in exchange for stock. LAC was one of four limited partners in a Quebec limited partnership the English translation of which is LAC and Company Limited. In August 1989, LAQ sold all of its shares of LAC capital stock to an unrelated Quebec numbered company, 2733-2915 Quebec, Inc.

In 1989, the second wholly-owned LAQ subsidiary, LAQ Canada, Ltd., was created to own and operate various Canadian mining properties and exploration prospects.

In October of 1973, LAQ acquired certain assets of National Asbestos Mines, Ltd. in an assets-only purchase. LAQ in particular did not purchase the National Gypsum name or the "Gold Bond" trademark or the rights to use them. Beginning in October 1973, LAQ mined chrysotile asbestos fiber from the property sometimes referred to as the "National Mine," which it operated as the National Mines Division of LAQ. In October 1984, LAQ ceased the operation of the National Mines Division. Among the assets which LAQ sold to LAC in 1986 were the assets which had comprised the National Mines Division. In 1989, LAQ sold all of its stock in LAC to 2733-2915 Quebec, Inc.

LAQ ceased mining, milling and selling chrysotile asbestos fiber entirely on or about June 30, 1986.

4. Please state whether or not Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liabilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products.) If so, please state the following:

- (a) the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- (b) the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (c) the date of each such acquisition;
- (d) the state in which each such acquisition was effected;

- (e) the state law governing each such acquisition if specified by contract;
- (f) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (g) whether the acquisition concerned asbestos-containing products.

ANSWER:

LAQ objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, LAQ has never acquired by way of a consolidation, merger, purchase or assets or otherwise, any company which manufactured, processed, sold or distributed asbestos containing products of any kind. In October of 1973, LAQ did acquire certain assets of National Asbestos Mines, Ltd. ("NAML") in an assets-only purchase. In this connection, LAQ in particular, did not purchase the National Gypsum name or the "Gold Bond" trademark or the rights to use them. As this was an assets only purchase and for other reasons, LAQ did not assume any of the liabilities of NAML. Neither did LAQ hire any of the directors, officers or major shareholders of NAML after this 1973 purchase. NAML continued to exist after the October 1973 sale of certain of its assets for at least several years as a corporation entirely separate from and unrelated to LAQ. It remained a subsidiary of National Gypsum Company during this period.

LAQ's National Mines operation produced chrysotile asbestos that had different characteristics than the chrysotile found in LAQ's Black Lake operation. For example, the fiber from the National Mine was much lighter in color than LAQ Black Lake fiber.

Beginning in October 1973, LAQ mined chrysotile asbestos fiber from the property sometimes referred to as the "National Mine," which it operated as the National Mines Division of LAQ. In October 1984, LAQ ceased the operation of the National Mines Division. Among the assets which LAQ sold to its wholly owned subsidiary, Lac d'Amiante du Canada, Ltee. ("LAC"), in 1986 were the assets which had comprised the National Mines Division. In 1989, LAQ sold to all of its stock in LAC to an unrelated Quebec numbered company, 2733-2915 Quebec, Inc.

4.1 For each corporation, other than the answering Defendant, that has at any time in the past been involved in the placing of asbestos-containing products into the stream of

commerce for which officers of the answering Defendant's corporation have also served as officers, directors or served in any managerial position while employed by the answering defendant, state:

- (a) the name of the entity involved in the placing of asbestos products into the stream of commerce;
- (b) the manner in which the entity was involved in the placing of asbestos containing products into the stream of commerce (i.e., mining, milling, manufacturing, distributing, installing, rebranding, etc.);
- (c) the specific products placed into the stream of commerce by the entity, year by year and by brand or trade name;
- (d) the name, positions and a brief description of the responsibilities of the person or persons serving the answering Defendant and the entity simultaneously, including the positions held with the entity and with the answering Defendant.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it vague, ambiguous and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant or admissible evidence. LAQ further objects to this Interrogatory on the grounds that it seeks information regarding entities other than LAQ.

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, Defendant's subsidiary or some other entity related to Defendant);
- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
 - (1) The trade or brand name.
 - (2) Its identification number (model, serial number, etc.).

- (3) The time period it was manufactured, mined, marketed, distributed or sold.
- (4) Its physical description including color, general composition, and form.
- (5) A detailed description of its intended use and purpose.
- (6) A detailed description of the type package in which it was sold, listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.
- (7) The percent of asbestos which it contained.
- (8) The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite, chrysotile).
- (c) The time period during which each of these products were on the market;
- (d) The material components/ingredients of each such product, giving specific or approximate percentage both by weight and by volume of each material component/ingredient (this interrogatory is not limited to the asbestos component of the product but seeks information as to the nature, weight and volume of non-asbestos ingredients, as well) of each such product;
- (e) How each of these asbestos-containing product can be distinguished from those of competitors;
- (f) A description of the physical appearance of such product;
- (g) A detailed description of the intended uses.

ANSWER:

LAQ states that it mined, milled and sold raw chrysotile asbestos fiber only. LAQ did not manufacture, sell, market, install or distribute any asbestos containing products. LAQ never mined, sold, distributed, brokered or in any way served as an intermediary for the sale or supply of amosite or crocidolite asbestos fiber or for the three other commercially less important types of amphibole asbestos, namely anthophyllite, actinolite and tremolite. LAQ notes that asbestos fiber from different regions, mines and countries had different and sometimes very different, physical, mineralogical, chemical and other characteristics. Blue asbestos, better known as crocidolite asbestos, indeed possesses a different texture, appearance and mineralogical composition than chrysotile asbestos or a product which contains only chrysotile asbestos. Brown asbestos, better known as amosite asbestos indeed also possess a different texture, appearance and mineralogical composition than chrysotile asbestos or a product which only contains chrysotile asbestos.

Furthermore, commercial chrysotile asbestos from different regions and geologic formations often possess differed physical and mineralogical properties.

During the period following its incorporation in September 1952 and prior to July 1958, LAQ mined and sold small quantities of raw chrysotile asbestos fiber on a limited basis, the result of an exploratory and pilot program which preceded commercial operations. In July of 1958, with the opening of its mill, LAQ began to commercially mine, mill and sell its raw chrysotile asbestos fiber. LAQ ceased mining, milling and selling raw asbestos fiber on or about June 30, 1986.

LAQ's raw asbestos fiber is chrysotile asbestos. LAQ's raw asbestos fiber was not altered except that it was separated from the host rock and milled for the purpose of separating grades of fiber. Milled chrysotile is a somewhat fluffy material of a generally white-gray color. Chrysotile asbestos is a hydrous magnesium silicate. A typical raw asbestos fiber included the following:

MgO	40.6%
SiO2	39.8%
Al2O3	0.7%
FeO	1.3%
Fe2O3	2.3%
CO2	0.5%
CaO	1.0%
H2O	13.8%

LAQ chrysotile fiber differs from the chrysotile fiber of other mines with respect to its color, iron content, chloride content and filtration characteristics, among other things. By way of specific example, LAQ's Black Lake chrysotile fiber was darker than that of many of LAQ's competitors and was therefore rejected for use in many color-sensitive finished products.

LAQ sold chrysotile fiber only to sophisticated manufacturing companies which used the chrysotile in their manufacturing processes. The use of LAQ's raw asbestos fiber, the manufacture of products containing asbestos and the marketing, sale or distribution of those asbestos-containing end products were fully and completely determined and controlled by the manufacturers of those products.

LAQ mined milled and sold the following grades of raw chrysotile fiber between September 1952 and June 30, 1986: 3F3, 3F4, 3K, 3K-EXP, 3K2, 3K3, 3K4, 3R, 3R2, 3R3, 3REXP, 3R4, 3T, 3T1, 3T3, 3T4, 3Z, 3Z3, 3Z4, 362, 4A3, 4A4, 4B2, 4B3, 4BEX, 4BX, 4D2, 4D2X, 4D3, 4D4, 4D4G, 4K4G, 4D-110, 4K, 4K3, 4K4, 4K5, 4K-500, 4M4, 4T, 4T1, 4T2, 4T3, 4T35, 4T3-R5, 4T3-76, 4T4, 4T4B, 4T4G, 4T5, 4T5EX, 4T-100, 4T-100, 4Z3, 4Z4, 5-100, 5D, 5D3, 5D3EX, 5D4, 5D4G, 5D5, 5DEX, 5D5EX, 5K, 5K3, 5K4, 5K4-1, 5K4BL, 5K5, 5M3, 5M4, 5R, 5R1, 5R2, 5R3, 5R4, 5R4-B, 5R4-1, 5R4-BL, 5R5, 5R5EX, 5T, 5Z3, 5Z4, 5Z5, 6D, 6D2, 6D2, 6D3, 6D3, 6D4B, 6D4BL, 6D4C, 6D4EX, 6D4S, 6D4SP, 6D46, 6D5,

6D5EX, 6F3, 6F4, 777, 7D, 7D1, 7D2, 7D3, 7D4, 7D4EX, 7D4-BL, 7D5, 7F2, 7F4, 7F5, 7H2, 7H3, 7H4, 7K2, 7K3, 7K4, 7M1, 7M2, 7M2C, 7M3, 7M4, 7M5, 7MS-1, 7MX, 7R2, 7R3, 7R4, 6R5, 7R5-3, 7R6, 7RF3, 7RS-1, 7RS-2, 7RS-11, 7T2, 7T4, 7T5, 7T6, 7T7, 7TS-1, 7TS-5, 7TS-30, 7TS-31, 8S, 17R3, 17R4, 17T1, 17T2, 17T3, 17T4, 17TS-1 and 17TS5.

LAQ's raw chrysotile asbestos fiber was shipped to its customers in various types of bags. Heavy paper bags were used throughout LAQ's period of operations. Jute bags were used from 1958 to 1966. Jute bags lined with paper were used from 1966 until 1970. Polyethylene bags were used from 1962 to 1986. The use of woven polyethylene bags began in November 1969 and continued until 1986. Some shipments were palletized and unitized with a plastic wrapping.

Printing on the bags generally stated "Lake Asbestos, Product of Lake Asbestos of Quebec, Ltd., Black Lake, Quebec, Canada." The bags also indicated the fiber type - e.g. "6D3", "4T4", "7D5", etc. After LAQ's name change in 1978, revisions were made to reflect the new corporate name and brand of the fiber, i.e. "LAQ" rather than "Lake." The word "Asbestos" was always printed on all bags of LAQ fiber.

6. Does Defendant or any of its subsidiary companies claim that any patent would cover any product listed in answer to Interrogatory No. 5? If so, please state the following:

- (a) The date of each patent;
- (b) The date same was issued;
- (c) The number of each patent application that is pending.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonable calculated to lead to the discovery of admissible evidence. LAQ further objects to the extent that this Interrogatory seeks information regarding entities other than LAQ. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ has never owned any patents. LAQ had a license to Canadian Patent No. 925,473 relating to the magnetic separation of asbestos fiber. LAQ also had a Technology Licensing Agreement with Johns-Manville that gave LAQ a non-exclusive license to utilize certain technology related to the packaging of asbestos fiber. It would appear, however, that LAQ never paid any licensing fees to Johns-Manville under this agreement and probably never used this technology.

7. Have any of the products listed above in answer to Interrogatory No. 5 been altered in chemical composition since first being marketed? If so, please state the following:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it mined, milled and sold raw chrysotile asbestos fiber only; it did not manufacture or sell any asbestos containing products. LAQ notes that commercial chrysotile asbestos fiber from different regions, and geographic formations often possesses different physical and mineralogical characteristics.

8. Have any of the asbestos-containing products listed in response to Interrogatory No. 5 ever been marketed, distributed, packaged, labeled, and/or sold by any other company or business? If so, please state the following:

- (a) The name and address of each such company.
- (b) The names and address of Defendant's distributors in Ohio, West Virginia, Pennsylvania and Kentucky since 1940.
- (c) The date of each sale.
- (d) The name of the person at each location with whom you primarily dealt.
- (e) A list of all asbestos-containing products that you sold to each location from 1945 to 1980.
- (f) The amount of each asbestos product sold to each location during this period.
- (g) Please identify all documents relating to this distributor for the particular location.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is vague and ambiguous. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it mined, milled and sold only raw chrysotile asbestos fiber; it did not manufacture or sell any asbestos-containing products. LAQ's raw chrysotile asbestos fiber was never marketed, distributed, packaged, labeled and/or sold in the Western Hemisphere by any other company or business.

8.01 Has Defendant ever purchased asbestos-containing products from any other Defendant?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, unduly harassing and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

8.02 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant from whom this Defendant purchased any asbestos-containing product;
- (b) list each product purchased from each co-Defendant;
- (c) list the dates of each purchase of asbestos-containing products from each co-Defendant.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court. Subject to and without waiving the foregoing objection, LAQ refers to its response to Interrogatory No. 8.01.

8.03 Has Defendant ever sold asbestos-containing products to any other Defendant?

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible

evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it mined, milled and sold raw chrysotile asbestos fiber only; it did not manufacture any asbestos containing products. LAQ states that it has never sold raw asbestos fiber to any of the sites listed by plaintiff on Exhibit A.

8.04 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant to whom this Defendant sold any asbestos-containing product;
- (b) list each product sold to each co-Defendant;
- (c) list the dates of each sale of asbestos-containing products to each co-Defendant.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 8.03.

8.05 Has Defendant engaged in the manufacture and/or sale and/or distribution and/or marketing and/or supply and/or purchase and/or use of non-asbestos-containing products for use in connection with temperatures above 125' Fahrenheit since 1930? If so, please state:

- (a) the date such activity began;
- (b) the years during which such activity took place;
- (c) the date when such activity was terminated;
- (d) if such activity was terminated, the reason(s) why;
- (e) the geographical area into which you claim the product(s) were sold, purchased, or used;
- (f) identify the organizational unit of Defendant so engaged;

- (g) the site(s) at which each such product was manufactured;
- (h) the material components of each such product, giving specific or approximate percentage both by weight and by volume of each material component of each such product;
- (i) the temperature ranges for which each product(s) was intended to be used;
- (j) the product's generic name;
- (k) the product's trade or brand name;
- (l) the container in which the product was shipped (i.e., paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings which appeared on the product, as well as a description of the package used, the dates that type of package was used, and any logos, product names, trademarks, etc. which appeared on the package;
- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ mined, milled and sold only raw chrysotile asbestos fiber; it did not manufacture, sell, distribute, market or supply any products for use in connection with temperatures above 125 degrees Fahrenheit.

8.06 Did Defendant ever market or distribute any asbestos-containing product manufactured in whole or in part by someone else? If so, please state the following for each such product:

- (a) the name and address of the manufacturer;
- (b) the product's trade and brand name;
- (c) the organizational unit of Defendant who did so;
- (d) date(s) beginning, ending and during which the marketing or distributing took place;
- (e) whether the product was distributed through the same channels as those used for products manufactured by Defendant, and if not, please explain the exact channels of distribution;
- (f) identify all documents relating the marketing or distribution.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ mined, milled and sold only raw chrysotile asbestos; it did not market or distribute any asbestos-containing products manufactured in whole or in part by someone else.

8.1 Does Defendant have reason to believe that any of the asbestos-containing products listed in response to Interrogatory No. 5 were used at any of the sites listed on Exhibit A, attached hereto? If your answer is "yes", please state:

- (a) The basis of your answer.
- (b) Which of Defendant's asbestos-containing products listed in Interrogatory No. 5 were used at each job site listed on Exhibit A.

ANSWER:

Defendant objects to this Interrogatory to the extent that it calls for speculation. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ mined, milled and sold only raw chrysotile asbestos fiber; it did not manufacture or sell any asbestos-containing products. LAQ is unaware of LAQ raw chrysotile asbestos fiber being used at any of the sites listed by plaintiffs on Exhibit A, as LAQ has no records of sale to any of these sites.

8.2 For each company or business that Defendant knows may have marketed, distributed, installed, and/or sold those products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A:

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.

- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from 1950 to 1974.
- (e) Identify all documents relating to the sales to each such company.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, defendant states that it is unaware of LAQ raw chrysotile asbestos fiber being present at or sold to any of the job sites listed by plaintiffs on Exhibit A.

8.3 If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed, distributed, installed and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of those companies, please state the following:

- (a) Name and address of each such company;
- (b) The dates of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt;
- (d) The names of the asbestos-containing products that Defendant marketed, distributed, and/or sold to each such company from 1950 to 1974.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and incomprehensible. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ mined, milled and sold only raw chrysotile asbestos fiber; it did not manufacture or sell any asbestos-containing products. As stated above, LAQ's raw asbestos fiber was not sold to any of the sites listed by plaintiffs on Exhibit A.

8.4 Does Defendant have records and/or any knowledge that reflects sales of their asbestos-containing products to any of the sites listed on Exhibit A, attached hereto? If so, please state the following as to each job site listed on Exhibit A:

- (a) The names and last known addresses of those people with such knowledge.
- (b) The location of such records.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ mined, milled and sold only raw chrysotile asbestos fiber; it did not manufacture or sell any asbestos-containing products. LAQ does not have records or knowledge reflecting sales of its raw chrysotile asbestos fiber to any of the sites listed by plaintiff on Exhibit A.

9. Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

- (a) The name and last known address of each such representative and whether they are still employed by Defendant;
- (b) The period of time they acted as your representative;
- (c) Their general responsibility as to each facility;

- (d) Whether that person is still alive; and
- (e) Any documents relating, referring or pertaining thereto.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is unduly burdensome and not calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, defendant refers to its answers to Interrogatories Nos. 8.1, 8.2 and 8.3. Further, LAQ is unaware of any sales of its raw chrysotile asbestos fiber to any of the sites listed by plaintiffs on Exhibit A.

9.1 Identify all managers and sales personnel responsible for your sales or installation of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of relevant evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, defendant did not have any managers or sales personnel specifically responsible for sales of LAQ raw asbestos fiber in Ohio. Roland Gagnon, deceased, was Vice-President of Sales of LAQ and was responsible for LAQ's sales within the United States.

10. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products? If so, please state:

- (a) The name of each subdivision;
- (b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and

(c) Whether said division or subsidiary conducted such business at any of the sites listed on Exhibit A from 1940 to 1975? If so, please state the following as to each job site listed on Exhibit A:

- (1) The dates of such contracts;
- (2) The specific asbestos-containing products that were used or removed in each contract.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ never had any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products.

11. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory.? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ never had any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory.

12. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and not reasonably calculated to lead to the discovery of relevant evidence. LAQ further objects to

this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it only mined, milled and sold raw chrysotile asbestos fiber; it never manufactured or sold asbestos containing products. LAQ operated the Black Lake mine and mill from 1958 to 1986 and the National mine and mill from 1973 to 1984.

13. Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

- (a) The name of the company manufacturing the asbestos products under such agreement;
- (b) The trade name affixed to such products;
- (c) The periods of time covered by each such agreement;
- (d) The volume (in dollars amounts) of each such transaction;
- (e) The purchaser of such products;
- (f) Does Defendant currently have in its possession any of the writings or contracts concerning such rebranding agreement?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it is without time or geographic limitation. LAQ further objects on the grounds that the term "rebranding agreement" is not defined. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it only mined, milled and sold raw chrysotile asbestos fiber; it never manufactured or sold asbestos containing products.

13.1 Have you ever owned or operated a business or portion thereof which engaged in construction, erection or tear-out of furnaces, pipes, boilers, turbines, lehrs, ovens, kilns, etc? If so, please state:

- (a) the name of said business;
- (b) the date of commencing business and cessation of business, if applicable;
- (c) type of construction or tear-out performed;
- (d) state whether said business installed or supplied asbestos-containing products on the furnaces, pipes, boilers, turbines, lehrs, etc., i.e., gaskets, pipecovering, block, cement, rope, cloth, clothes, etc., containing asbestos, asbestos pipe, board, etc.;
- (e) state the trade name and/or manufacturer of any asbestos-containing product which you installed or supplied to any site on Exhibit A.
- (f) provide the dates for the applicable construction, installation or tear-out project.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has never owned or operated a business or portion thereof which engaged in the construction, erection or tear-out of furnaces, pipes, boilers, turbines, lehrs, ovens or kilns.

13.2 Do you have within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;
- (b) the present location and custodian of each such package;

(c) the date or approximate date on which each such package was produced.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, vague, ambiguous and incomprehensible. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ's raw chrysotile asbestos fiber was shipped to its customers in various types of bags. Heavy paper bags were used throughout LAQ's period of operations. Jute bags were used from 1958 to 1966. Jute bags lined with paper were used from 1966 until 1970. Polyethylene bags were used from 1962 to 1986. Some shipments were palletized and unitized with a plastic wrapping.

Printing on the bags generally stated: "Lake Asbestos, Product of Lake Asbestos of Quebec, Ltd., Black Lake, Quebec, Canada." The bags also indicated the fiber type - e.g. "6D3," "4T4," "7D5," etc. After LAQ's name change in 1978, revisions were made to reflect the new corporate name and brand of fiber, i.e. "LAQ" rather than "Lake." The word "Asbestos" was always printed on all bags of LAQ fiber.

Some bags are presently located at the offices of LAQ's national counsel, Porzio, Bromberg & Newman, P.C.

14. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed above in answer to Interrogatory No. 5?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. This Interrogatory is more properly aimed at a manufacturer of asbestos-containing products that can develop and design its products, rather than a raw material supplier such as LAQ. In this connection, LAQ notes that its product, chrysotile asbestos fiber, cannot be designed or have "manufacturing specifications" since it is a raw

material created by the forces of nature millions of years ago, which is then simply removed from the ground by LAQ, packaged, and sold to customers.

15. As to each product listed in response to Interrogatory No. 5, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. In answering this question, give particular reference as to whether or not the materials were to be sawed or cut on the job, blown into confined areas, mixed with water in a cement or paste.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ states that it sold its chrysotile asbestos fiber only to sophisticated manufacturing concerns. The use of LAQ's raw asbestos fiber, the manufacture of products containing asbestos and the marketing, sale or distribution of those asbestos-containing end products, as well as how each product was to be applied or utilized on the job, were fully and completely determined and controlled by the manufacturers of those products.

16. Based upon the material contents of the asbestos-containing products, the method of manufacturing, and the method of application, please state which products listed in Interrogatory No. 5 could be applied by a worker without creating dust.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects on the grounds that the term "applied" is not defined. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber.

17. Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the products listed in answer to Interrogatory No. 5? If so, please:

- (a) List each such written material or document;
- (b) Identify the person or persons presently in possession of each such document;
- (c) State where each such document is located.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. This Interrogatory is more properly aimed at a manufacturer of asbestos-containing products that can develop and design its products, rather than a raw material supplier such as LAQ. In this connection, LAQ notes that its product, chrysotile asbestos fiber, cannot be designed or have "specifications" since it is a raw material created by the forces of nature millions of years ago, which is then simply removed from the ground by LAQ, packaged, and sold.

18. Prior to releasing the products listed in Interrogatory No. 5 for sale and usage, were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.

- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that this defendant has not performed independent studies concerning the effect of inhalation of asbestos on the physical condition of persons exposed to asbestos or asbestos-containing products.

18.1 Prior to releasing any products for sale and usage (whether asbestos-containing or not), were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture any asbestos-containing or other products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ refers to its response to Interrogatory No. 18.

19. Does Defendant have or control any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character relating to the testing of the products listed in Interrogatory No. 5 hereinabove?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;
- (c) State where each such document is located.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ states that it performed numerous standard test procedures for evaluation of raw chrysotile asbestos fiber including tests in some or all of the following categories: sampling, fiber length, bulk and density, viscosity, air permeability, filtration or freeness, oil absorption, rock and fiber spicules, color, moisture, detection of foreign materials, potential index, asbestos cement fiber, tensile strength and magnetic rating. Testing was an integral part of providing customers with exactly the right fiber for their individual needs. Testing was designed to achieve the following objectives: greater uniformity of fiber length and length distribution, closer control of degree of fiberization, closer control of material of the fine particle size in the longer grades, and closer control of filtration rates. Implementing this program necessitated the addition of many different types of equipment and the employment of technicians whose only responsibility was to see that LAQ's fiber met the established specifications. Tests were made not only before shipment of fiber but also at various points in the milling process so that the required uniformity could be achieved.

Fiber sampling is the procedure for producing a representative sample from a larger amount of asbestos. Typically, a ten pound sample would be rolled in such a

manner that rock and spicules accumulate on the bottom of the fiber pile. The sample is shaped into a cone and quartered. One quarter of the sample is then coned and quartered repeatedly until the desired sample size is produced. Samples are subjected to further testing.

Tests for fiber length include the Quebec Standard Screen, the Bauer-McNett, the Ro-Tap Sieve Analysis, the Suter-Webb Length Distribution test and the Dust Content-Dry Test. Details concerning each test follows.

The Quebec Standard Screen Test measures fiber length by using a machine consisting of four or five nesting boxes which are superimposed one above the other. The bottoms of the top boxes are made to specification from brass screening material. Sixteen ounces of asbestos are placed on the uppermost tray which is then covered and tightly clamped. The machine is set to make exactly 600 revolutions. The asbestos which remains in each box is weighed. The results are reported as the weight of asbestos retained in each box, expressed in ounces. The total is always sixteen, and one-tenth ounce is the smallest fraction reported. LAQ had an asbestos grade classification which followed and amplified the Canadian Standard.

The Bauer-McNett Fiber Classifier is able to make an accurate determination of length distribution and fines content of milled asbestos fiber. The classifier is composed of four or five tanks arranged in a cascade pattern so that the effluent from the first tank flows by gravity into each of the lower tanks. The overflow from the bottom tank discharges into a drain. Each tank is divided into two equal sections by a removable screen. The larger section of each tank is provided with means for mechanical agitation of the water-asbestos dispersion passing through it. At the bottom of each tank, is a drain hole with pipe connected to a filter-holding drain cup. Each tank is fitted with a screen of different mesh, the coarsest mesh in the first tank and the finest mesh in the last tank. A weighted filter paper is positioned in each drain cup. Drain holes are stoppered, the tanks are filled with water, the agitators are started and the flow of water is adjusted to obtain a steady flow from tank to tank and from the last tank to the drain. At the end of a run, each tank is drained through its own filter cup and the screen and tank interior are thoroughly rinsed, insuring that all fiber adhering to them is deposited on the filter paper for that tank. The filter papers with their individual sample fractions are removed, dried and weighed. The percentage of the original sample remaining in each tank and the percentage passing through the last tank is calculated. The mesh of the screens used and the percentage of the sample retained in each tank serves as a precise measure of the grade of asbestos fiber being tested.

The Ro-Tap machine is a mechanical sieve shaker with automatic timer. There are Tyler sieves for each of the different asbestos fiber grades. A 50 gram sample is used for fiber grades of 3, 4 and 5 and a 100 gram sample is used for fiber grades 6, 7 and floats. The sample is placed in the top sieve of the nest of sieves with the smallest screen at the bottom and the largest on top. The nest is covered, shaken and tapped for a prescribed

period of time. The amount of material retained on each screen is then weighed to 0.1 gram. The percent of material by weight retained on each sieve and pan is reported.

The Suter-Webb Length Distribution test is appropriate for grade three fiber only. The fiber sample is prepared according to precise directions. The sample is aligned and combed with special equipment which includes forceps, leather tipped tweezers, a velvet cover plate and special combs. The results are reported as fiber length distribution and average fiber length. The length distribution of the fibers is obtained by calculating the weight percent of fiber in each length fraction. The average length of the sample is equal to the sum of the average length of a fraction times the weight of that fraction divided by the total sample weight.

For the Dust Content-Dry test, a fiber sample of prescribed weight is placed between two screens that are clamped so that they can be rotated 180 degrees. Air jets are directed on the screen for a prescribed number of minutes. The fiber remaining on the screens is weighed. The results are reported as percent weight loss as - 100 mesh dust.

There are three types of bulk and density testing as follows: (1) wet bulk density (2) dry bulk density and (3) wet cake weight. Wet bulk density testing for fiber grades 4 & 5 is carried out by placing 500 ml. of water at 77 degrees Fahrenheit into a 500 milliliter graduate cylinder. The cylinder is inverted a prescribed number of times according to the grade of fiber being tested. The report includes the volume in milliliters to which the fiber has settled at the end of 1, 2, 3, 4, and 5 minutes for grade four fiber and 5 and 60 minutes for grade five fiber. Wet bulk density testing for fiber grades 6, 7 and floats is carried out by placing 990 milliliters of water at 77 degrees Fahrenheit into a 1000 milliliter graduate cylinder. Fifty grams of asbestos fiber are added to the cylinder that is then filled to the brim with water. The cylinder is inverted twenty times. Then, a technician reads the water-fiber line after 1, 2, 4 and 8 hours. The volume in milliliters to which the fiber has settled at the end of 8 hours is reported. Two tests are done for each fiber type and the reports averaged.

For dry bulk density testing, 100 grams of fiber are lightly hand rubbed to eliminate wads or lumps. The fiber is transferred to a folded paper and poured gently into a 100 milliliter graduate cylinder without tapping or tamping. The volume is reported in milliliters occupied by the 100 grams of fiber and/or in pounds per cubic foot.

After the wet bulk density test has been completed, the wet cake weight test is done. A tin cylinder four inches in diameter and 4-8 inches long is fitted on one end with a 35 mesh wire disk. The fiber-water mixture from the wet bulk density test is poured into the can and allowed to drain until the dripping stops. The weight of the drained fiber is reported in grams.

One type of viscosity test is performed with a MacMichael Viscosimeter, Texaco Altair Oil SAE-30 oil, a ½ gallon can and a portable electric cake mixer. The mixing procedure is similar to mixing cake dough, i.e., adding liquid in small increments to

prevent the formation of lumps. After all the oil has been added, the mixture is allowed to stand for ½ hour. Then, a reading is taken on the viscosimeter. The cup of the viscosimeter is filled to the top with the oil and fiber mixture. The mixture is worked with a spatula to release air bubbles. Viscosity is measured at 77 degrees Fahrenheit with a 22 gauge wire equipped with a one centimeter in diameter cylindrical plunger. The viscosimeter is set at 20 r.p.m. and a reading is taken after 10 seconds of rotation. The viscosity report is the average of three readings.

A viscosity test may also be performed with a Clarvov Consistometer, asphalt cutback slate dust and asbestos fiber. A standard mix is prepared which requires some judgment as to the amount of asbestos fiber. The mix is heated to 77 degrees Fahrenheit. A consistency reading is taken with a brass rod loaded with 150 grams of mix. The time required for the rod to penetrate four inches is recorded. A standard penetration of 5.0 to 6.0 seconds is required. If the time is not 5.0 to 6.0 seconds a new batch with more or less fiber must be made and tested.

One type of air permeability test is performed with a cylindrical chamber 4 inches high and 1 ½ inches in diameter with a 100 mesh copper screen on one end. A cylindrical compression cup is used with a sample asbestos fiber that has a porosity of 0.80. Air flow is regulated on a Precision Bore Flowrator. Pressures are recorded on either standard "U" tube mercury or water manometers, graduated in centimeters. Air is drawn through the sample by a vacuum pump having a free displacement of 1.3 cfm. Readings on the manometer record the differential pressure across the packed asbestos fiber bed. The average pressure for three runs is reported for relative degree of openness or fineness of the fiber.

Air permeability may also be tested using an air permeability tester, Blaine design, Dyckerhoff system. A 56 gram sample of asbestos fiber with porosity rating 0.7 to S, G. 2.55 is tamped into a cell and compressed with a plunger. The plunger is locked into place to prevent fiber springback. The time it takes for air to be drawn through the fiber plug is recorded to the nearest second. The time is read directly from a clock which is set to stop when a predetermined quantity of air has been drawn through the fiber sample. The test is repeated four times for each fiber sample and the average recorded in seconds. To convert permeability readings in seconds to effective surface area, refer to a suitable calibration graph to determine the surface area in terms of cm²/gm.

The filtration or freeness test is performed with a 14 inch piece of a 2 inch copper tubing with an adapter at one end to which a cup is screwed. A piece of stainless steel screen is attached to a ring and placed into the cup to give volume of approximately 50 milliliters between the screen and the bottom of the cup. A ¼ inch pet-cock is fastened to the bottom of the cup. Ten grams of fiber are poured into a 100 milliliter graduate cylinder, and water at 77 degrees Fahrenheit is added to the 500 milliliter mark. The cylinder is inverted 20 times. The slurry is poured quickly into the tube so that the fiber will cover the screen uniformly. After 5 seconds, the pet-cock is opened. Timing starts when 50 milliliters have drained. The interval between 50 milliliters and 150 milliliters is

measured and recorded. The time to collect the 100 milliliters of water is reported in seconds as a measure of the freeness.

Oil absorption is tested with a 20-gram sample of fiber. Raw chemical grade linseed oil is added to the fiber sample slowly - one or two drops at a time. The mixture is stirred with a stiff spatula. The end point is reached when oil can be squeezed out of a ¼ inch diameter ball of fiber held between thumb and first finger. Oil absorption is reported as the amount of oil to reach the end point in milliliters per 100 grams of fiber.

Fiber is tested for rock and spicules using a standard gold pan 16 inches in diameter. Following precise directions for each fiber grade, fiber and water are placed in the gold pan. The pan is agitated 8 to 10 times to give a circular motion to the water in the pan. More water is added and allowed to settle for a few seconds. The pan is tilted to let some of the water out and also as a means of rejecting the floating fiber. This step is repeated several times. When most of the open fiber has been rejected, the remaining fiber is agitated with the finger tips to break the lumps. This step is repeated until all the open fiber has been floated out. The remainder is call the grit. The grit is collected into an evaporating dish, the excess water is decanted and the material is dried under infrared lamps for 20 minutes. The material is weighed and reported as the percent of grit in the fiber. Then, the grit is placed on a 20 x 20 mesh Ro-Tap sieve which is tapped by hand to get rid of the minus 20 mesh fibers. By moving the finger tips over the residue, a technician counts the particles of rock which roll under the finger tips. If the particle count is over 15 it is reported as "lots of particles". If the particle count is less than 15, the exact number of particles is reported. Then, by visual examination of the residue on the 30 mesh sieve the pieces of unopened fiber are counted. If only one or two unopened fibers are found, it is report as "none". If three to five unopened fibers are found, it is reported as "few". If more than five unopened fibers are found, it is reported as "many".

Color testing of asbestos fiber is done with a photoelectric reflection meter with a standard search unit. Interchangeable glass color filters are required with green, blue and amber tristimulus filters. One white enamel working standard calibrated for filters is also required. A sample of asbestos fiber is placed in a cup and pressed to a layer about ¼ inch thick. The cup is placed on the search unit and a galvanometer reading is taken. The report includes the galvanometer reading on the test sample, the color of filter used, and working standard galvanometer readings before and after each test.

Asbestos is tested for moisture by placing 100 grams of fiber to dry at 105 degrees Centigrade for three hours. The sample is reweighed and the percentage of weight loss is calculated and reported as a percentage of moisture of the original, undried sample.

Asbestos fiber is tested in several ways to detect foreign material. Tests for staining are performed by making "pats" from 75% white cement and 25% asbestos fiber. The material is cured for one day and then autoclaved for eight hours at 125 psi (350 degrees Fahrenheit). The material is then inspected for discolored areas. Testing for wood fiber is

performed by dumping fiber into water and stirring to disperse the lumps. After the mixture stands for a while, the surface of the water is inspected for floating wood.

Testing for tar, petroleum products, or belt dressing is performed by making a slurry of fiber which is 50% carbon tetrachloride or ether and benzene. The mixture is agitated to dissolve organic impurities and then filtered. The solvents are allowed to evaporate and the residue examined.

Testing for cotton or wool is performed after a fiber sample has been tested for wood and/or soluble organics as described previously. Examining the fibers under magnification may be sufficient to reveal the presence of fibers such as cotton or wool. Since a wool or cotton fiber will burn when exposed to a flame while asbestos fibers will not. The burned fiber provides the final confirmation of their organic nature.

The Potential Index Test is performed by spreading five pounds of asbestos fiber out on a table and sucking it up with a flexible hose from a blower at a constant rate. After all the fiber has passed through the blower and settled into the can under the collector, the sample is weighed. The following tests are run on the samples to determine when the full potential of the fiber has been developed: flexural strength of asbestos cement pats, Bauer-McNett, wet and dry bulk density, air permeability, water filtration rate, Ro-Tap, and Quebec Standard Screen.

Prescribed formulas are used for preparing the mix in the asbestos cement fiber test. "Pats" of the mixture are steam cured and allowed to condition 16 to 24 hours at room temperature, 100% RH desiccator before autoclaving 7 hours at 125 psig saturated steam. If the normal or humidity cure is used, the "pats" are allowed to cure 7 days at room temperature and 100% RH. It is always advisable to have a set of control "pats" made from a standard fiber. The resulting material is tested for flexural strength, water absorption, density, and percentage of fiber. Reports include data on formula and curing method, flexural strength, density and water absorption test results.

Tensile strength testing is performed with a Clemson Flat Bundle Fiber Tester. Bundle samples are selected by carefully slicing a segment from a chunk of crude fiber along the long axis of the specimen. Samples are usually from 0.5 to 1.5 mg. in weight and from 1.0 to 2.5 cm. in length. The sample is placed in the clamping fixtures of the Clemson Flat Bundle Fiber Tester. A constant rate of load of 1000 grams per second is applied to the sample. Breaking load, in grams, is recorded on a chart by means of a pen attached to the loading system. There is a complicated formula for calculating the tensile strength from this data.

Magnetic testing of asbestos fiber is performed with a Mapes Magnetic Analyzer, including test solenoid and amplifier, specified test specimen holders, standard magnetite powder and C.P. zinc oxide. A ten-gram sample of asbestos fiber is placed in the specimen holder. The apparatus is energized and permitted to warm up for several minutes to become stable. The secondary coils are then balanced using the balancing coil until the deflection on the

amplifier dial is a minimum at full sensitivity. The sensitivity is then decreased and the calibrating standard for the range of test desired is placed in the testing solenoid. The amplifier gain control is then adjusted to give a full-scale deflection equal to the magnetic rating of the calibrating standard. The calibrating standard is then removed, and the sample holder with the 10-gram asbestos test specimen is inserted in the solenoid. The instrument will give the magnetic rating of the asbestos specimen. Any documents responsive to this Interrogatory are in the possession of LAQ's national counsel, Porzio, Bromberg & Newman, P.C.

20. Were any design changes or modifications made as a result of such tests listed in answer to Interrogatory No. 18 hereinabove? If so, please state:

- (a) The trade name of the product changed or modified;
- (b) The nature of the change made and the date of such changes or modifications;
- (c) The name, address, and job classification of each person in charge of making a change.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 18.

21. After releasing for sale, distribution or marketing the products listed in answer to Interrogatory No. 5, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials and/or products?

- (a) The names of the products tested and the dates of said tests;
- (b) The name, address, and job classification of each person and/or agency conducting said tests;
- (c) The results of said tests;

- (d) Whether, as a result of any tests conducted, any products were removed from the market;
- (e) The names of all products removed from the market as a result of said tests.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that this defendant has not performed independent studies concerning the effect of inhalation of asbestos on the physical condition of persons whose employment exposed them to asbestos or asbestos products.

However, with respect to LAQ's former employees, researchers Sylvaine Cordier, G. Theriault and Simone Provencher followed 350 LAQ long-term employees who, prior to employment with LAQ, had no previous asbestos exposure. In 1984, their research "Radiographic Changes in a Group of Chrysotile Miners and Millers Exposed to Low Dust Concentrations" was published in the British Journal of Industrial Medicine. The authors reported the results of their study of radiographic changes in this group of LAQ employees, reporting detailed results on 331 miners and 19 office workers. The miners had cumulative exposures that ranged from 7 fibers per cubic centimeter x years (fiber years) to 300 fiber years. Their exposures lasted for an average period of 20 years and had started between 10 and 27 years before.

Readers experienced in the reading of x-rays to diagnose pneumoconiosis individually read radiographs according to the ILO U/C 1980 classification. The films were provided in random order, and the readers were unaware of the individuals' occupations or exposure to asbestos.

The authors did not conclude that any of the subjects suffered from asbestos-related disease. They merely reported the results of an x-ray study, which in and of itself is insufficient to diagnose asbestos-related disease. In fact, the prevalence of x-ray findings was virtually identical among exposed and unexposed subjects.

Of LAQ's miners, "2.1% showed a small opacity score of 1/0 or more and 2.7% showed pleural changes. No linear relationship could be established between small opacity score and any index of exposure to asbestos. Pleural changes were related to age. A referent group of office workers within the same mining industry showed a prevalence of 2.1% (1/48) for small irregular opacities 1/0 or more and for pleural changes."

22. Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

- (a) The dates and nature of such studies;
- (b) The names and addresses of persons conducting such studies;
- (c) The purpose of such studies;
- (d) Identify and list those persons to whom such reports were given and the date of such dissemination;
- (e) State any publication or other written dissemination of the results of such studies;
- (f) State the nature of any action to eliminate or minimize the inhalation of asbestos dust fibers; and
- (g) Attach a copy of reports based upon such studies.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and vague to the extent that the phrase "caused to be conducted" is not defined. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 21. Further, it should be noted that LAQ has participated in the funding of numerous studies performed by other entities relating to these issues.

The members of QAMA established the Institute of Occupational and Environmental Health (IOEH) in 1966 in Montreal, Quebec, Canada. The objective of the IOEH was to better assess the biological effect of asbestos on the health of asbestos workers and the general population. For this purpose the IOEH established a scientific committee.

Dr. Wright, of St. Luke's Hospital in Cleveland, Ohio, was the chairman of the Scientific Committee, which was responsible for evaluating grant requests and recommending funding for research projects. In addition to Dr. Wright, the following individuals served on the Scientific Committee at various times: Dr. Fernand Gregoire, Dr. Paul Kotin, Dr. John Beattie, Dr. Daniel Braun, Dr. Premysl Pelnar, Dr. Ian Higgins and Dr. Marvin Kushner.

Scientists submitted grant requests to the Scientific Committee for evaluation according to subject matter, proposed methodology and feasibility. Based on these considerations, the Scientific Committee would make recommendations to the Executive Committee of the IOEH regarding projects to fund.

The IOEH has supported numerous research projects on asbestos-related health issues from which many scientific publications have originated. In December of 1977, the Institute published a booklet entitled The Research Projects Supported by IOEH and the Scientific Publications Originating from Them 1966-1976. The booklet presents a comprehensive survey of research projects, the names of researchers, a description of each project, the names of contributing firms, the amount of money spent per project, and the publications generated as a result of the research.

Dr. Pelnar, Scientific Secretary of the IOEH, administered the daily operations of the Scientific Committee. His primary function was to act as a liaison between the members of the IOEH Scientific Committee, the asbestos industry and the doctors who conducted the independent medical research. He served on the Scientific Committee from 1966 until he retired in 1984. In addition, Dr. Pelnar developed and administered a library of literature on asbestos and health. The extensive collection included newspaper articles, published and unpublished medical treatises, and trade magazines. This literature was available to government officials, researchers, practicing doctors and industry officials. Initially, IOEH sent full text versions of documents upon request. Later, Dr. Pelnar provided abstracts of articles with the full text sent upon further request. For articles in foreign languages, Dr. Pelnar provided his own translated abstract along with a copy of the original article. In addition to his scientific qualifications, Dr. Pelnar's fluency in six or seven languages made him well suited for the position of IOEH Scientific Secretary. More than two hundred recipients in several countries obtained literature from this library.

Although LAQ, through the IOEH, supported scientific research to better assess the biological effects of asbestos, LAQ has been aware since it began commercial production of chrysotile asbestos that knowledge of the potential dangers of asbestos was common among governmental and private industrial hygienists, occupational physicians and the large sophisticated manufacturing concerns to which LAQ began selling chrysotile fiber. In addition, medical and scientific literature on the potential dangers of asbestos had been published in a wide variety of medical and scientific periodicals, textbooks, and other publications which were readily available to any interested entity or individual. Furthermore, since it began commercial operation, LAQ was aware that there were well

understood and widely available methods of industrial hygiene which could ensure that the use of LAQ's chrysotile asbestos would not pose a hazard to human health.

23. Before placing in the market the asbestos-containing products that Defendant, mined, manufactured, sold, marketed, installed or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

- (a) The date of said studies;
- (b) What studies were done; and
- (c) The titles of each study.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated the lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its responses to Interrogatories Nos. 18-22.

24. Please state whether or not Defendant ever conducted or caused to be conducted any tests in the field (where asbestos-containing products were applied, removed or utilized) to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees, or other workers removing and/or tearing out asbestos-containing products, and/or other workers in the vicinity thereof? If so, please identify:

- (a) The date, place and nature of each and every test;
- (b) The particular asbestos-containing products to which each test applied;

- (c) The results of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site; and
- (d) The persons to whom the results said tests were given and the date of such dissemination.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ states that it never performed dust sampling in any facility where asbestos fiber was being used since that was the responsibility of the employer and LAQ fully expected that the employers were fulfilling the responsibility of taking appropriate measures to protect employees.

25. Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

- (a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;
- (b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained;
- (c) What information was disseminated within Defendant's company, or its subsidiary or predecessor regarding such adverse consequences or effects;
- (d) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- (e) The name, address and job classification of the custodian of such information.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that from its incorporation, LAQ's management had been aware of the possibility that particularly susceptible persons who are exposed to excessive amounts of asbestos fibers over a prolonged period of time might develop the disease asbestosis. LAQ management was further aware that this information was common knowledge among governmental and private industrial hygienists, occupational physicians and the sophisticated manufacturing concerns to which LAQ began selling chrysotile fiber commercially in 1958. In addition, medical and scientific literature on the potential dangers of asbestos had been published in a wide variety of medical and scientific periodicals, textbooks, and other publications which were readily available to any interested entity or individual.

At or around the time that LAQ began the commercial sale of chrysotile fiber in 1958, it became aware of contradictory articles in the medical literature on whether there was an association between asbestosis and an increased incidence of lung cancer. LAQ is and was aware that most authors who reported the possibility of such an association recognized that both the methodology of the studies and the limited number of cases reported prevented any firm conclusions. Furthermore, LAQ is and was aware that many researchers had reported a lack of association between asbestos exposure and lung cancer and asbestosis and lung cancer.

In addition, through the 1960s, LAQ continued to learn of the publication of new studies regarding the health effects of asbestos inhalation. In 1964, LAQ became aware of an epidemiological study which suggested that persons exposed to asbestos-containing products might have an increased risk of developing lung cancer, mesothelioma and certain gastro-intestinal cancers. This study did not, however, differentiate between manufacturing processes or between chrysotile and other forms of asbestos, nor did it take into account the role of cigarette smoking in causing cancer or the levels of workers' exposure to asbestos dust including such concepts as dose-response relationships and threshold limit values. Many further studies which have been reported since that time have indicated that the risk of developing lung cancer as a result of exposure to chrysotile asbestos is minimal except in extraordinary circumstances of overexposure of high intensity and long duration.

Similarly, since the mid-1960s, most researchers have reported little or no association between exposure to chrysotile asbestos and the development of mesothelioma or gastro-intestinal cancers. In fact, there are no published studies of which LAQ is aware which demonstrate that these forms of cancer are caused by exposure to milled chrysotile fiber at or below the TLVs in existence during the period of LAQ's sale of commercial quantities of chrysotile asbestos. Furthermore, numerous studies have been published supporting the position that chrysotile asbestos can be used safely or with minimal risk.

26. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma, lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 25.

27. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not have a medical department or employee physicians responsible for performing medical examinations on workers exposed to raw asbestos fiber or asbestos-containing products. LAQ did not hire its own medical director, nor did LAQ have employees whose sole duty was industrial hygiene. However, LAQ regularly consulted with local physicians, including Doctors Clement Fortier, Claude Fortin, Richard Lambert, Paul Cartier, and Jacques Dussault concerning asbestos health issues and the medical condition of its employees.

28. As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 27. Additionally, LAQ employees were required to take a physical examination upon the being hired. They were thereafter provided with yearly physical examinations by physicians of the Thetford Industrial Clinic.

29. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture asbestos containing products; it only mined, milled and sold raw chrysotile asbestos fiber. LAQ has no record of any such recommendations or suggestions. LAQ states that it is unaware of any specific recommendations or suggestions pertaining to the risks or hazards to persons involved in the manufacturer or use of asbestos containing products.

30. Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 and 1975.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has never established or maintained any medical library. At various times, some LAQ individual employees may have had or maintained certain items or materials with regard to medical and scientific literature. There was, and is, no clearing house for this information, nor were subscriptions recorded. LAQ is accordingly unable to provide more specific information.

30.1 Please state whether Defendant, its medical officer or industrial hygienist or medical consultant or physicians were ever involved in testing or received literature or correspondence from the Mellon Institute.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court. Subject to and without waiving the foregoing objection, LAQ was never involved in testing or received literature or correspondence, except through various litigation, from the Mellon Institute.

30.2 Has Defendant, or any engineer, industrial hygienist or physician in Defendant's employ, been a member in any professional group, trade group or any of the following groups:

American Ceramics Society
Asbestos Textile Institute
National Insulation Manufacturers Association
Thermal Insulation Manufacturers Association
Quebec Asbestos Mining Association
Asbestos Information Association
Industrial Health Foundation

Industrial Hygiene Foundation
Iron and Steel Institute
National Safety Counsel
Refractories Institute
Air Hygiene Foundation of America, Inc.
Sprayed Mineral Fiber Association
American Society of Mechanical Engineers

If the answer is yes, state the following:

- (a) The name of the group or groups in which Defendant or individual(s) were members;
- (b) The name and position individual(s) within the Defendant, as defined, who were members;
- (c) The years Defendant or individual(s) were members of the groups;
- (d) Whether Defendant paid the individual(s) dues or membership fees or reimbursed the individual(s) for dues or membership fees in the group.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it belonged to the following organizations:

- A. Quebec Asbestos Mining Association (QAMA) of Montreal, Province of Quebec, Canada;**
- B. Asbestos Textile Institute and the Asbestos Textile Institute, Inc. (hereinafter collectively referred to as ATI) in Washington, D.C. (as an associate member only);**
- C. Asbestos Information Association of North America (AIA/NA) of Washington, D.C.;**

LAQ was a member of the Quebec Asbestos Mining Association (QAMA) from November 19, 1959 to 1986.

LAQ was an associate non-voting member of ATI between 1959 and 1981. As LAQ was only an associate member of ATI, it held no officer positions and was precluded from voting on policy-making decisions.

LAQ was a member of the AIA/NA from 1981 to 1986.

Specifically, the employees, consultants, officers and/or directors of LAQ who periodically attended meetings of and/or may have received minutes of the meetings of QAMA, ATI or AIA/NA at various times included Roland P. Gagnon, Edward A. Farrell, Michael J. Messell, Lionel C. Piuze, E.L. Rimbault, Marc Roy, Leonard C. Webster, Gilles Dostie, G.K. Patel, Charles E. Stiefken, Ronald W. Godfrey, Robert D. Bradford, Andre Gauthier, Raymond LeFebvre, Jean P. Theriault, Robert J. Muth, Peter Bucholz, Jean Dupere, Harold F.X. Plate, Gaston Verreault, J. Philip Wise, Yvonnice Bolduc, Ralph L. Hennebach, Charles Z. Carroll-Porzynski, and William R. Whitener.

LAQ did not at any time belong to the America Ceramics Society, National Insulation Manufacturers Association, Thermal Insulation Manufacturers Association, Industrial Health Foundation, Industrial Hygiene Foundation, Iron and Steel Institute, National Safety Counsel, Refractories Institute, Air Hygiene Foundation of America, Inc., Sprayed Mineral Fiber Association, the American Society of Mechanical Engineers,

31. State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture any asbestos-containing products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ states that sales representatives of LAQ visited a limited number of manufacturing facilities (with the visits almost always limited to the plant offices as opposed to the production areas) where its asbestos fiber was being used. However, for competitive and other reasons, the customers virtually never let LAQ people in the manufacturing areas of their plants. This defendant never performed dust sampling in any of the aforesaid facilities because it did not have access to the production areas of its customers' plants and because dust sampling, as with other industrial hygiene measures,

was the responsibility of the employer. LAQ fully expected that the employers it dealt with were fulfilling the responsibility of taking appropriate measures to protect their employees.

32. For each test described in Interrogatory No. 31, please give the name of the person conducting the test, the date of the test, and attach true copies of any documents, including but not limited to, reports, findings or memoranda concerning such tests or studies.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ refers to its response to Interrogatory No. 31.

33. Please state the year that Defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee/official of the company receiving such advice.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that from 1958, when LAQ began commercial mining, milling and sales of chrysotile asbestos fiber, LAQ was aware that the ACGIH TLV for asbestos was five million particles per cubic foot. LAQ designed and constructed its mill at Black Lake to incorporate the latest industrial hygiene equipment and technology. LAQ, aware that the ACGIH TLV was 5 mppcf, designed its mill to achieve at least that level of dust control. LAQ understands that the ACGIH based its TLV, at least in significant part, on the 1938 Dreessen study. Furthermore, since the beginning of its commercial practice, LAQ was well aware that there were well understood and widely available methods of industrial hygiene which could ensure that the use of LAQ's chrysotile asbestos would not pose a hazard to human health.

In 1968, there was proposed change to the ACGIH TLV for asbestos to two million particles per cubic foot or its equivalent of 12 fibers per cc. LAQ was aware in 1972 that OSHA had adopted a permissible exposure level of 5 fibers per cc. On July 1, 1976, the OSHA standard changed to 2 fibers per cc. LAQ was aware of these standards.

33.1 State whether Defendant at any time conducted, caused to be conducted, or had conducted on any job site, or at any of Defendant's plants or buildings, any air sampling, dust counts, dust observations, dust sampling tests or other activities to determine air quality. If your answer is in the affirmative, please indicate:

- (a) the date of any such air samples, tests, or activities;
- (b) by whom such activities were performed;
- (c) where such activities were performed;
- (d) the results of any such activities.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its responses to Interrogatories Nos. 31-32. With respect to LAQ's own facilities, LAQ regularly took dust counts at its Quebec operations beginning shortly after the commencement of its operations in 1958. In addition, representatives from the Quebec Asbestos Mining Association, usually Maurice LaChance, on occasion came to the LAQ mine and mill in Black Lake to take dust counts. The QAMA dust counts at its members mines stopped in or about the early 1970s, as the individual companies chose to do and solely rely upon their own dust counts.

34. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;

- (c) The name(s) of the librarians since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has never established or maintained any medical or scientific library. At various times, some individual LAQ employees may have had or maintained certain items or materials with regard to medical and scientific literature. There was, and is, no clearing house for this information, nor were subscriptions recorded. LAQ is accordingly unable to provide more specific information.

LAQ was a founding member of the Institute of Occupational and Environmental Health (IOEH) in 1966. One of the functions of IOEH was to develop a library of literature on asbestos and health and to make sure such literature was available to anyone interested, including government officials, researchers, practicing doctors, and industry officials. Similarly, in 1981, LAQ became a member of the Asbestos Information Association, which maintained a library on asbestos and health in Washington, D.C. and which provided information and copies of literature to anyone requesting them.

35. Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it never commissioned or participated in the agreements with Metropolitan Life Insurance

Company for studies at the Trudeau Foundation at Saranac Lake. In fact, this Interrogatory addresses events that occurred before LAQ existed.

36. When was Defendant first aware of reports of studies of the Trudeau Foundation at Saranac Lake, New York, entitled "Effects of the Inhalation of Asbestos Dust in the Lungs of Asbestos Workers" by A.J. Lanza, Assistant Medical Director published in the J. Public Health Report, Vol. 50, No. 1, dated January 4, 1935 ("Lanza Report")?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ has no knowledge of when, if ever, except through litigation, it learned of the Lanza Report.

36.1 Did Defendant ever contract with Saranac Laboratories to study the hazards of any dust producing product manufactured by you (whether asbestos-containing or not)? If so, identify by date and author all documents concerning or any way related to such study.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ never contracted with Saranac Laboratories.

36.2 Did Defendant ever contract with Saranac Laboratories to analyze dust or products? If so, identify by date and author all documents concerning or any way related to such analysis.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ refers to its response to Interrogatory No. 36.1.

37. Please state whether Defendant at any time has been a member of any "trade organization" or "trade association" composed of other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 30.2. Additionally, LAQ was a member of the Institute of Occupational and Environmental Health (IOEH), Montreal, Province of Quebec, Canada from its formation in 1966 through 1982. Moreover, by reason of its membership in QAMA, LAQ was represented in the Conseil de Patronat, Quebec Professional Chambre of Commerce, Canadian Shippers Council, Canadian Exporters Association, Canadian Industrial Traffic League, American Society of Testing Materials, Chambre Syndicate de L'Amiante of Paris, France, Japanese Asbestos Association, Asbestos Information Committee of London, Asbestosis Research Council and Asbestos International Association. However, LAQ employees generally did not attend meetings of these associations.

38. With respect to each trade organization or association listed in answer to Interrogatory No. 37, please state whether the minutes of the group's meetings and any correspondence between the members of such groups concerning the hazards of asbestos exposure are available.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that any documents pertaining to this Interrogatory are in the possession of LAQ's national counsel, Porzio, Bromberg & Newman, P.C.

39. Please identify by name the technical and trade association periodicals to which Defendant subscribed, and state whether Defendant had knowledge of any articles being printed, or withheld from printing, in said periodicals pertaining to the potential hazards of asbestos. If so, please state the following:

- (a) The title of each such article;
- (b) The periodical in which each such article was published;
- (c) The date each such article was published;
- (d) A detailed explanation of the reason for withholding any such article for printing;
- (e) Produce documentation which refers, alludes or mentions articles which were withheld for publication.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its responses to Interrogatories Nos. 30 and 34. Further, LAQ is unaware of any articles being withheld from publication.

40. Please state whether, prior to 1975, Defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has constructed as complete a list as possible of meetings which its employees attended from February of 1959 through 1975, of asbestos related trade associations or other asbestos-related organizations of which it was a member or associate member. The subject of occupational health and exposure to asbestos may have been discussed at some of these meetings. The list is as follows:

QAMA MEETINGS

Minutes Of A Special Meeting Of The Quebec Asbestos Mining Association

Date: Monday, February 23, 1959

Place: Seigniory Club, Montebello, P.Q.

Attendees:

**H.M. Ball
C.F. Barber
E.A. Boadway
R.D. Bradford
J.W. Brown
C.B. Burnett
I.C. Campbell
R.S. Coleman
J.O. Eby
A.R. Fisher
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
A.S. Johnson, Sr.
A.S. Johnson, Jr.
W.J. Johnson
K.V. Lindell
J.A.D. Marcotte**

M.J. Messel
P.A. Meyer
A.L. Penhale
F.P. Smith
G.W. Smith
H.A. Smith
I. Sabourin
W.H. Soutar

Minutes Of A Special Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 21, 1960

Place: British Colonial Hotel, Nassau

Attendees:

H.M. Ball
R.D. Bradford
J.W. Brown
C.B. Burnett
I.C. Campbell
D.T. Colton
A.R. Fisher
N.W. Hendry
G.F. Jenkins
A.S. Johnson, Sr.
A.S. Johnson, Jr.
W.J. Johnson
K.V. Lindell
G.K. McKenzie
J.A.D. Marcotte
M.J. Messel
P.A. Meyer
A.L. Penhale
F.P. Smith
H.A. Smith
R. Williams
I. Sabourin
W.H. Soutar

72nd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 9, 1961

Place: Chateau Frontenac, Quebec

Attendees:

K.V. Lindell
E.A. Boadway
R.S. Coleman
W.J. Johnson

M.J. Messel
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
J.O. Eby
R. Gagnon
F.P. Hodgson
J.R.M. Hutcheson
W.A. Janitch
A.S. Johnson, Jr.
L.O. Montpetit
M. Pharo
G. Robinson
F.P. Smith
H.A. Smith
J.P. Wiser
I. Sabourin
W.H. Soutar

73rd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 6, 1961
Place: St. George's Club, Sherbrooke, P.Q.
Attendees:

K.V. Lindell
R.S. Coleman
W.J. Johnson
M.J. Messel
A.L. Penhale
G.W. Smith
I.C. Campbell
J.O. Eby
F.P. Hodgson
J.R.M. Hutcheson
G.F. Jenkins
A.S. Johnson, Jr.
L.O. Montpetit
M. Pharo
G. Robinson
H.A. Smith
I. Sabourin
W.H. Soutar

74th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 1, 1961
Place: St. George Club, Sherbrooke, P.Q.

Attendees:

K.V. Lindell
E.A. Boadway
W.J. Johnson
M.J. Messel
A.L. Penhale
G.W. Smith
I.C. Campbell
J.O. Eby
F.P. Hodgson
J.R. Hutcheson
G.F. Jenkins
A.S. Johnson, Jr.
L.O. Montpetit
M.C. Pharo
G. Robinson
H.A. Smith
I. Sabourin
W.H. Soutar

21st Meeting of the Technical and Research Committee of the Quebec Asbestos Mining Association

Date: November 14, 1961

Place: Thetford Mines, Quebec

Attendees:

G.F. Jenkins
G.F. Brink
R.A. Bromley-Moore
H.A. Smith
R. Dodds-Hebron
J.R. Hutcheson
V.C. Lindsay
W.P. Archer
F.P. Hodgson
M.C. Pharo
G.W. Riley
L.C. Piuze
J.K. Quigley
L.O. Montpetit
J.J. Paré

77th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 8, 1962

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

K.V. Lindell
R.S. Coleman
W.J. Johnson
M.J. Messel

P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
J.O. Eby
F.P. Hodgson
J.R. Hutcheson
W.A. Janitch
G.F. Jenkins
A.S. Johnson, Jr.
R.J. Merrill
L.O. Montpetit
W.W. Oughtred
M.C. Pharo
G. Robinson
F.P. Smith
H.A. Smith
J.P. Wiser
I. Sabourin
W.H. Soutar

22nd Meeting of the Technical and Research Committee of the Quebec Asbestos Mining Association

Date: January 16, 1962
Place: Thetford Mines, Quebec
Attendees:

G.F. Jenkins
G.F. Brink
R.A. Bramley-Moore
H.A. Smith
R. Dodds-Hebron
W.P. Archer
V.C. Lindsay
R.J. Merrill
J.J. Sztuke
F.P. Hodgson
D.O. Poirier
M.C. Pharo
G.W. Riley
J.P. Wiser
J.K. Quigley
L.O. Montpetit
J.J. Paré

78th Meeting Of The Quebec Asbestos Mining Association

Date: March 5, 1962
Place: St. George's Club, Sherbrooke, P.Q.
Attendees:
K.V. Lindell

R.S. Coleman
W.J. Johnson
M.J. Messel
A.L. Penhale
G.W. Smith
I.C. Campbell
A.B. Cummins
J.O. Eby
F.P. Hodgson
J.R. Hutcheson
A.S. Johnson, Jr.
R.J. Merrill
L.O. Montpetit
G. Robinson
F.P. Smith
I. Sabourin
W.H. Soutar

Special Meeting of the Quebec Asbestos Mining Association

Date: Friday, March 23, 1962

Place: Seigniory Club, Montebello, P.Q.

Attendees:

R.M. Bateman
E.A. Boadway
R.D. Bradford
C.B. Brown
I.C. Campbell
R.S. Coleman
D.T. Colton
A.B. Cummins
J.O. Eby
A.W. Gibb
R. Hackney
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
A.S. Johnson, Jr.
W.J. Johnson
K.V. Lindell
J.A. Main
J.A. Marcotte
M.J. Messel
P.A. Meyer
L.O. Montpetit
A.L. Penhale
F.P. Smith
G.W. Smith
H.A. Smith
I. Sabourin
W.H. Soutar

79th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 7, 1962

Place: The Chateau Frontenac, Quebec, P.Q.

Attendees:

R.S. Coleman
E.A. Boadway
W.J. Johnson
M.J. Messel
P.A. Meyer
A.L. Penhale
I.C. Campbell
J.O. Eby
R. Gagnon
F.P. Hodgson
J.R. Hutcheson
L.O. Montpetit
W.W. Oughtred
G. Robinson
F.P. Smith
H.A. Smith
I. Sabourin
W.H. Soutar

80th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, July 9, 1962

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

K.V. Lindell
E.A. Boadway
W.J. Johnson
M.J. Messel
A.L. Penhale
G.W. Smith
A.B. Cummins
R. Gagnon
F.P. Hodgson
J.R. Hutcheson
G.F. Jenkins
A.S. Johnson, Jr.
M.C. Pharo
G. Robinson
F.P. Smith
H.A. Smith
I. Sabourin
W.H. Soutar

81st Meeting Of The Quebec Asbestos Mining Association

Date: Monday, September 10, 1962
Place: St. George's Club, Sherbrooke, P.Q.
Attendees:

K.V. Lindell
R.S. Coleman
W.J. Johnson
M.J. Messel
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
J.O. Eby
F.P. Hodgson
J.R. Hutcheson
G.F. Jenkins
W.H. Soutar
A.S. Johnson, Jr.
L.O. Montpetit
M.C. Pharo
G. Robinson
F.P. Smith
I. Sabourin

26th Meeting - Technical Committee of the QAMA

Date: September 25, 1962
Place: Thetford Mines, Quebec
Attendees:

G.F. Jenkins
G.F. Brink
R.A. Bramley-Moore
H.A. Smith
J.R. Hutcheson
W.P. Archer
V.C. Lindsay
Dr. R.J. Merrill
J.J. Satuke
F.P. Hodgson
D.O. Poirier
G.W. Riley
J.P. Wiser
J.G. Verreault
J.G. Foy
L.O. Montpetit
J.J. Paré
Dr. G.A. Collins
R.C. Murray
C.J. Lu

25th Meeting - Technical and Research Committee of the QAMA

Date: December 11, 1962

Place: Thetford Mines, Quebec

Attendees:

G.F. Jenkins
G.F. Brink
R.A. Bramley-Moore
H.A. Smith
R. Dodds-Hebron
J.R. Hutcheson
W.P. Archer
V.C. Lindsay
Dr. R.J. Merrill
F.P. Hodgson
D.O. Poirier
M.C. Pharo
G.W. Riley
L.C. Piuze
J.G. Foy
J.J. Paré
Dr. A.B. Cummins
Dr. G.A. Collins
H.M. Woodrooffe
Dr. A.A. Winer

82nd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 28, 1963

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

R.S. Coleman
W.J. Johnson
K.V. Lindell
M.J. Messel
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
F.P. Hodgson
J.R. Hutcheson
W.A. Janitch
G.F. Jenkins
A.S. Johnson, Jr.
M.C. Pharo
G. Robinson
F.P. Smith
H.A. Smith
J.P. Wiser
I. Sabourin
W.H. Soutar
L.L. Knott
J. Gossip

83rd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 25, 1963

Place: The St. George's Club, Sherbrooke, P.Q.

Attendees:

W.J. Johnson
G. Robinson
A.S. Johnson, Jr.
A.L. Penhale
G.F. Jenkins
K.V. Lindell
M.C. Pharo
L.C. Piuze
P.A. Meyer
L.O. Montpetit
R.S. Merrill
I.C. Campbell
J.O. Eby
R. Coleman
G.W. Smith
H.A. Smith
F.P. Hodgson
J.R. Hutcheson
P. Smith
I. Sabourin

Special Meeting of The Quebec Asbestos Mining Association

Date: Thursday, May 2, 1963

Place: The Chateau Frontenac, Quebec

Attendees:

W.J. Johnson
R.S. Coleman
F.P. Hodgson
G.F. Jenkins
K.V. Lindell
J.A. Martin
R.J. Merrill
M.J. Messel
W.H. Soutar
P.A. Meyer
A.L. Penhale
H.A. Smith
I. Sabourin

84th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 27, 1963

Place: The St. George's Club, Sherbrooke, P.Q.

Attendees:

W.J. Johnson
R.S. Coleman
M.J. Messel
A.L. Penhale
G.W. Smith
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
F.P. Hodgson
J.R. Hutcheson
G.F. Jenkins
A.S. Johnson, Jr.
M.C. Pharo
G. Robinson
F.P. Smith
W.H. Soutar
I. Sabourin

Special Meeting of the Quebec Asbestos Mining Association

Date: July 25, 1963

Place: The Manoir Richelieu, La Malbaie

Attendees:

W.J. Johnson
R.S. Bradford
C.B. Brown
I.C. Campbell
M.P. Carson
D.T. Colton
A.B. Cummins
J.O. Eby
P.A. Filteau
A.W. Gibb
R. Hackney
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
K.V. Lindell
J.A. Main
R.W. Merrill
M.J. Messel
P.A. Meyer
L.O. Montpetit
W.W. Oughtred
A.L. Penhale
F.P. Smith
G.W. Smith

I. Sabourin
W.H. Soutar

Meeting

Date: July 25, 1963

Place: Murray Bay

Attendees:

W.J. Johnson
R.D. Bradford
C.B. Brown
I.C. Campbell
M.P. Carson
D.T. Colton
A.B. Cummins
J.O. Eby
P.A. Filteau
A.W. Gibb
R. Hackney
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
K.V. Lindell
J.A. Main
I. Sabourin
R.W. Merrill
M.J. Messel
P.A. Meyer
L.O. Montpetit
W.W. Oughtred
A.L. Penhale
F.P. Smith
G.W. Smith

85th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, October 28, 1963

Place: The Chateau Frontenac, Quebec, P.Q.

Attendees:

W.J. Johnson
M.J. Messel
A.L. Penhale
R.S. Coleman
P.A. Meyer
G.W. Smith
G. Robinson
I.C. Campbell
J.R. Corbett (A.S. & R.)

**R. Dodds-Hebron
J.O. Eby
F.P. Hodgson
G.F. Jenkins
A.S. Johnson, Jr.
R.J. Merrill
L.O. Montpetit
M.C. Pharo
F.P. Smith
I. Sabourin
P.A. Filteau**

86th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 13, 1964

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

**W.J. Johnson
M.J. Messel
A.L. Penhale
R.S. Coleman
P.A. Meyer
G.W. Smith
G. Robinson
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
F.P. Hodgson
W.A. Janitch
G.F. Jenkins
A.S. Johnson, Jr.
L.O. Montpetit
M.C. Pharo
G.A. Piché
F.P. Smith
J.P. Wiser
I. Sabourin
P.A. Filteau**

Special Meeting of The Quebec Asbestos Mining Association

Date: Thursday, February 6, 1964

Place: Jamaica Hilton Hotel, Ocho Rios, Jamaica

Attendees:

**M.J. Messel
E.A. Boadway
J.O. Eby
W.J. Johnson
K.V. Lindell**

P.A.meyer
A.L. Penhale
Geo. W. Smith
R.D. Bradford
J.W. Brown
I.C. Campbell
M.P. Carson
D.T. Colton
A.B. Cummins
R. Hackney
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
W.W. Oughtred
F.P. Smith
W.H. Soutar
P.A. Filteau

Special Meeting of The Quebec Asbestos Mining Association

Date: Friday, February 7, 1964

Place: Jamaica Hilton Hotel, Ocho Rios, Jamaica

Attendees:

M.J. Messel
E.A. Boadway
J.O. Eby
W.J. Johnson
L.V. Lindell
P.A. Meyer
A.L. Penhale
Geo. W. Smith
R.D. Bradford
J.W. Brown
I.C. Campbell
M.P. Carson
D.T. Colton
A.B. Cummins
R. Hackney
N.W. Hendry
F.P. Hodgson
G.F. Jenkins
W.W. Oughtred
F.P. Smith
I. Sabourin
P.A. Filteau

87th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 23, 1964

Place: Chateau Frontenac, Quebec City

Attendees:

M.J. Messel
E.A. Boadway
J.O. Eby
R.S. Coleman
W.J. Johnson
P.A. Meyer
A.L. Penhale
G. Robinson
I.C. Campbell
W. Darrell
R. Dodds-Hebron
F.P. Hodgson
G.F. Jenkins
A.S. Johnson, Jr.
L.O. Montpetit
W.W. Oughtred
M.C. Pharo
G.A. Piché
L.H. Poulin
F.L. Smith
I. Sabourin
P.A. Filteau

88th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 25, 1964

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

E.A. Boadway
J.O. Eby
K.V. Lindell
P.A. Meyer
G.W. Smith
G. Robinson
I.C. Campbell
R. Dodds-Hebron
F.P. Hodgson
G.F. Jenkins
L.O. Montpetit
W.W. Oughtred
G.A. Piché
L.C. Piuze
F.P. Smith
I. Sabourin
P.A. Filteau

Meeting of the Uniform Classification and Grading Committee of the QAMA

Date: July 23, 1964

Place: Asbestos Corporation Limited Board Room, Thetford Mines, Quebec

Attendees:

F.P. Hodgson
G.F.A. Brink
R. Dodds-Hebron
R.J. Merrill
J.P. Wiser
R.S. Coleman
P.A. Filteau

89th Meeting Of The Quebec Asbestos Mining Association

Date: Wednesday, October 14, 1964

Place: St. George's Club, Sherbrooke, P.Q.

Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
R. Dodds-Hebron
F.P. Hodgson
G.F. Jenkins
R.J. Merrill
L.O. Montpetit
W.W. Oughtred
G.A. Piché
F.P. Smith
G. Robinson
I. Sabourin
P.A. Filteau

90th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, November 23, 1964

Place: Chateau Frontenac, Quebec City, P.Q.

Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
P.A. Meyer
G.W. Smith
I.C. Campbell
R. Dodds-Hebron
F.P. Hodgson
J.R.M. Hutcheson
G.F. Jenkins
F.P. Smith

I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, February 4, 1965
Place: Jamaica Hilton Hotel, Ocho Rios, Jamaica
Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
P.A. Meyer
R.D. Bradford
J.W. Brown
I.C. Campbell
M.P. Carson
W. Darrell
R. Dodds-Hebron
R. Hackney
N.W. Hendry
F.P. Hodgson
J.R.M. Hutcheson
G.F. Jenkins
W.W. Oughtred
F.P. Smith
I. Sabourin
P.A. Filteau

Meeting of the Uniform Classification and Grading Committee of the QAMA

Date: March 19, 1965
Place: Bell Mine Office
Attendees:

G.F.A. Brink
R. Dodds-Hebron
J.O. Eby
R.J. Merrill
F.P. Hodgson
J.P. Wiser
G. Foy

92nd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 22, 1965
Place: St. George's Club, Sherbrooke, P.Q.
Attendees:

M.J. Messel
J.O. Eby

R.S. Coleman
K.V. Lindell
A.L. Penhale
Geo.W. Smith
I.C. Campbell
R. Dodds-Hebron
F.P. Hodgson
J.R.M. Hutcheson
G.F. Jenkins
L.O. Montpetit
W.W. Oughtred
F.P. Smith
J.P. Wiser
Geo. Robinson
I. Sabourin
P.A. Filteau

93rd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 24, 1965
Place: Chateau Frontenac, Quebec City, P.Q.
Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
Yvan Couture
F.P. Hodgson
R.J. Merrill
L.O. Montpetit
W.W. Oughtred
M. Prus
F.P. Smith
G. Robinson
I. Sabourin
P.A. Filteau

QAMA - Correction to Minutes of Meeting

Date: Monday, May 24, 1965
Place: Chateau Frontenac, Quebec City, P.Q.
Attendees:

A.L. Penhale
G.W. Smith
K.V. Lindell
J.O. Eby
E.A. Boadway

J.A. Main
M.J. Messel
R.S. Coleman
P.A. Meyer

Special Meeting Of The Quebec Asbestos Mining Association

Date: Tuesday, July 27, 1965
Place: Keltic Lodge, Cape Breton Island, Nova Scotia
Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
J.A. Main
P.A. Meyer
A.L. Penhale
R.D. Bradford
C.B. Burnett
I.C. Campbell
M.P. Carson
R. Dodds-Hebron
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
G.F. Jenkins
W.W. Oughtred
F.P. Smith
I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Wednesday, July 28, 1965
Place: Keltic Lodge, Cape Breton Island, Nova Scotia
Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
J.A. Main
P.A. Meyer
A.L. Penhale
R.D. Bradford
C.B. Burnett
I.C. Campbell
M.P. Carson
R. Dodds-Hebron
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
G.F. Jenkins

W.W. Oughtred
F.P. Smith
I. Sabourin
P.A. Filteau

94th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, September 20, 1965
Place: St. George's Club, Sherbrooke, P.Q.
Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
J.A. Main
P.A. Meyer
A.L. Penhale
G.W. Smith
I.C. Campbell
R. Dodds-Hebron
H. Foster
J.R.M. Hutcheson
R.J. Merrill
L.C. Piuze
D.O. Poirier
F.P. Smith
G. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Uniform Classification and Grading Committee of the QAMA

Date: November 4, 1965
Place: Asbestos Corporation Operations Office Board Room
Attendees:

W.H. Foster
R. Dodds-Hebron
W.P. Archer
V.C. Lindsay
J.G. Blais
D.O. Poirier
R. Lefebvre
C.E. Stiefken
J.P. Wiser
G. Foy
J. Paré

95th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, November 29, 1965

Place: Chateau Frontenac, Quebec City, P.Q.

Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
P.A. Meyer
G.W. Smith
I.C. Campbell
R. Dodds-Hebron
H. Foster
J.R.M. Hutcheson
R.J. Merrill
D.O. Poirier
F.P. Smith
Geo. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Technical Committee of the QAMA

Date: November 30, 1965

Place: Ottawa, Ontario

Attendees:

R.J. Dodds-Hebron
G.F.A. Brink
M. Cosratte
W.H. Foster
W.P. Archer
V.C. Lindsay
Dr. Convory
A.A. Winer
H.M. Woodrooffe
H.G. Zoldners
L.C. Piuze
R. Lefebvre
J.G. Foy
J. Paré
P.A. Filteau
L.O. Montpetit
J.P. Wronski
R.J. Merrill
J.J. Satuke
D.O. Poirier
G.R. Munger
J.P. Boldne

Meeting of the Uniform Classification and Grading Committee of the QAMA

Date: January 28, 1966

Place: Asbestos Corporation Operations Office Board Room

Attendees:

G.F.A. Brink
W.H. Foster
R. Dodds-Hebron
J.R.M. Hutcheson
D.O. Poirier
R. Lefebvre
J.P. Wiser
G. Foy
F. Bolduc
N.P. Cook
J. Paré

96th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, March 7, 1966

Place: Chateau Frontenac, Quebec City, P.Q.

Attendees:

M.J. Messel
J.O. Eby
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
I.C. Campbell
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson
R.J. Merrill
I. Sabourin
L.O. Montpetit
A.L. Penhale
D. Poirier
F.P. Smith
G. Robinson
P.A. Filteau

Joint Meeting of the Public Relations Committee and the Occupational and Environmental Health Committee of the QAMA

Date: Wednesday, May 4, 1966

Place: Mount Stephen Club, Montreal, Quebec

Attendees:

M.J. Messel
Karl V. Lindell
I.C. Campbell
R.S. Coleman
I. Sabourin
L.L. Knott
R.J. Merrill
G. Scowcroft

W.P. Raines
Y. Couture
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Friday, April 1, 1966
Place: Dorado Hilton Hotel, Dorado, Puerto Rico
Attendees:

M.J. Messel
J.O. Eby
K.V. Lindell
J.A. Main
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
J.W. Brown
H.M. Ball
R.D. Bradford
I.C. Campbell
M.P. Carson
R. Dodds-Hebron
J.W. Duncan
A.R. Fisher
W.H. Foster
G.G. Gabrielson
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
A.L. Penhale
F.P. Smith
I. Sabourin
P.A. Filteau

97th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 30, 1966
Place: Chateau Frontenac, Quebec City, P.Q.
Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
I.C. Campbell
R.D. Dalinger
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson

R.J. Merrill
A.L. Penhale
D. Poirier
P.H. Riordon
G. Scowcroft
F.P. Smith
G. Robinson
I. Sabourin
P.A. Filteau

48th Meeting of the Technical Committee of the QAMA

Date: July 5, 1966
Place: Thetford Mines, Quebec
Attendees:

R.J. Dodds-Hebron
G.F.A. Brink
J. Giansanto
W.P. Archer
V.C. Lindsay
A.A. Winer
J.C. Blais
J.P. Wiser
R. Gale
P.A. Filteau
M. Cossette
W.B.R. Callan
M.C. Pharo
J.P. Wronski
J.R. Hutcheson
Dr. R.J. Merrill
J.J. Sztuke
W.W. Woodrooffe
D.O. Poirier
R. Lefebvre
L.C. Piuze
G. Verreault
G.R. Munger
F. Bolduc
J. De Grandpré
L.O. Montpetit
H.P. Cook
J.G. Foy
W.H. Foster

Meeting of the Uniform Classification & Grading Committee of the QAMA

Date: July 20, 1966
Place: Asbestos Corporation Operations Office Conference Room

Attendees:

**G.F.A. Brink
W.H. Foster
R.J. Dodds-Hebron
J. Eby
Dr. R.J. Merrill
J.P. Wiser
R. Gale**

Special Meeting of the Quebec Asbestos Mining Association

Date: August 3-6, 1966

Place: Jasper Park Lodge, Jasper, Alberta

Attendees:

**A.L. Penhale
W.W. Oughtred
M.P. Carson
I.C. Campbell
W.H. Foster
G.W. Smith
F.P. Smith
R. Dodds-Hebron
D.T. Colton
R. Hackney
H.M. Ball
K.V. Lindell
J.O. Eby
N.W. Hendry
J.R.M. Hutcheson
R.J. Merrill
A.H. Bangenstose
J.A. Main
R.D. Bradford
M.J. Messel
Lionel Piuze
John Brown
J.W. Duncan
R.S. Coleman
P.A. Meyer
G.G. Gabrielson
J. Christian
Jack Berry
Dr. George W. Wright
W.C. Wansbrough
L.J. Patterson
L.C. Langlois
I. Sabourin
P.A. Filteau**

97th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 30, 1966

Place: Chateau Frontenac, Quebec City, P.Q.

Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
I.C. Campbell
R.D. Delinger
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson
R.J. Merrill
A.L. Penhale
D. Poirier
P.H. Riordon
G. Scowcroft
F.P. Smith
G. Robinson
I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, August 4, 1966

Place: Jasper Park Lodge, Jasper, Alberta

Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
J.A. Main
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
H.M. Ball
Jack Berry
R.D. Bradford
J.W. Brown
I.C. Campbell
M.P. Carson
J. Christian
D.T. Colton
R. Dodds-Hebron
J.W. Duncan

W.H. Foster
G.G. Gabrielson
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
R.J. Merrill
A.L. Penhale
L. Piuze
F.P. Smith
W.C. Wansbrough
I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Friday, August 5, 1966

Place: Jasper Park Lodge, Jasper, Alberta

Attendees:

M.J. Messel
J.O. Eby
R.S. Coleman
K.V. Lindell
J.A. Main
P.A. Meyer
W.W. Oughtred
Geo. W. Smith
H.M. Ball
Dr. John Beattie
Jack Berry
R.D. Bradford
J.W. Brown
I.C. Campbell
M.P. Carson
J. Christian
D.T. Colton
R. Dodds-Hebron
J.W. Duncan
W.H. Foster
G.G. Gabrielson
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
R.J. Merrill
A.L. Penhale
L. Piuze
F.P. Smith
W.C. Wansbrough
Dr. Geo. Wright
I. Sabourin
P.A. Filteau

49th Meeting of the Technical Committee of the QAMA

Date: September 13, 1966
Place: Thetford Mines, Quebec
Attendees:

R.J. Dodds-Hebron
G.F.A. Brink
W.B.R. Collan
E.J. Day
G.A. Piché
J.J. Sztuke
J.C. Blais
R. Lefebvre
R. Gale
M. Cossette
G.J. Foy

Meeting of the Uniform Classification & Grading Committee of the QAMA

Date: September 20, 1966
Place: Conference Room Asbestos Corporation Operations Office
Attendees:

C.F.A. Brink
W.H. Foster
R.J. Dodds-Hebron
J. Eby
J.R.M. Hutcheson
Dr. R.J. Merrill
J.C. Blais
R. Gale
N.P. Cook
J.P. Wiser

98th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, September 26, 1966
Place: Chateau Frontenac, Quebec City, P.Q.
Attendees:

M.J. Messel
R.S. Coleman
K.V. Lindell
J.A. Main
P.A. Meyer
W.W. Oughtred
I.C. Campbell
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson
A.L. Penhale
L. Piuze

D. Poirier
M. Prus
P.H. Riordon
G. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Uniform Classification & Grading Committee of the QAMA

Date: September 26, 1966

Place: Quebec

Attendees:

K.V. Lindell
J.R. Hutcheson
W.W. Oughtred
G.F. Brink
I.C. Campbell
P.H. Riordon
W.H. Foster
M.J. Messel
L.C. Piuze
D. Poirier
J.A. Main
M. Prus
R. Dodds-Hebron
P.A. Meyer
P.A. Filteau

Meeting of the Uniform Classification & Grading Committee of the QAMA

Date: November 16, 1966

Place:

Attendees:

G.F. Brink
J.O. Eby
R.J. Merrill
D. Poirier
J.P. Wiser
N.P. Cook
R.S. Coleman
R. Dodds-Hebron

99th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, December 12, 1966

Place: Chateau Frontenac, Quebec City, P.Q.

Attendees:

M.J. Messel
J.O. Eby

R.S. Coleman
K.V. Lindell
P.A. Meyer
R.J. Merrill
W.W. Oughtred
F.P. Smith
F. Bolduc
I.C. Campbell
R. Dodds-Hebron
W.H. Foster
J. Gauthier
J.R.M. Hutcheson
A.L. Penhale
H.S. Jobbins
D. Poirier
P.H. Riordon
G. Robinson
I. Sabourin
P.A. Filteau

100th Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, February 2, 1967
Place: Barbados Hilton, Barbados, W.I.
Attendees:

M.J. Messel
W.W. Oughtred
K.V. Lindell
R.J. Merrill
P.A. Meyer
F.P. Smith
R.D. Bradford
I.C. Campbell
M.P. Carson
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
A.R. Fisher
W.H. Foster
G.G. Gabrielson
R.P. Gagnon
R. Hackney
N.W. Hendry
J.R.M. Hutcheson
A.L. Penhale
D. Poutiatine
P.H. Riordon
G. Robinson
I. Sabourin
P.A. Filteau

101st Meeting Of The Quebec Asbestos Mining Association

Date: Monday, April 10, 1967
Place: Chateau Frontenac, Quebec City, Quebec
Attendees:

W.W. Oughtred
K.V. Lindell
J.A. Main
R.J. Merrill
P.A. Meyer
F.P. Smith
F. Bolduc
I.C. Campbell
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson
A.L. Penhale
L. Piuze
D. Poirier
M. Prus
P.H. Riordon
G. Robinson
I. Sabourin
P.A. Filteau

102nd Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 29, 1967
Place: Chateau Frontenac, Quebec City, Quebec
Attendees:

M.J. Messel
R.S. Coleman
K.V. Lindell
R.J. Merrill
P.A. Meyer
F.P. Smith
F. Bolduc
I.C. Campbell
Yvan Couture
R. Dodds-Hebron
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
D. Poirier
P.H. Riordon
Geo. Robinson
I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, August 10, 1967
Place: Manoir Richelieu, Murray Bay, Quebec
Attendees:

M.J. Messel
W.W. Oughtred
R.S. Coleman
K.V. Lindell
J.A. Main
R.J. Merrill
P.A. Meyer
F.P. Smith
R.D. Bradford
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
L.G. Langlois
Dr. P. Pelnar
L. Piuze
D. Poirier
P.H. Riordon
G.C. Scowcroft
Dr. G.W. Wright
G. Robinson
I. Sabourin
P.A. Filteau

Special Meeting Of The Quebec Asbestos Mining Association

Date: August 9, 1967
Place: Manoir Richelieu, Murray Bay, Quebec
Attendees:

M.J. Messel
W.W. Oughtred
R.S. Coleman
K.V. Lindell
J.A. Main
R.J. Merrill
P.A. Meyer
F.P. Smith
R.D. Bradford
I.C. Campbell
M.P. Carson
D.T. Colton

Y. Couture
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
L.G. Langlois
L. Piuze
D. Poirier
P.H. Riordon
G.C. Scowcroft
G. Robinson
I. Sabourin
P.A. Filteau

Special Meeting of the Quebec Asbestos Mining Association

Date: Tuesday, August 10, 1967

Place: Manoir Richelieu, Murray Bay, Quebec

Attendees:

M.J. Messel
W.W. Oughtred
R.S. Coleman
K.V. Lindell
J.A. Main
R.J. Merrill
P.A. Meyer
F.P. Smith
R.D. Bradford
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
L.G. Langlois
Dr. P. Pelnar
L. Piuze
D. Poirier
P.H. Riordon
G.C. Scowcroft
Dr. G.W. Wright
G. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Uniform, Classification & Grading Committee of the QAMA

Date: November 7, 1967

Attendees:

R. Merrill
J. Eby
L. Montpetit
R. Lefebvre
V. Lindsay
D. Poirier
W.H. Foster

103rd Meeting of the Quebec Asbestos Mining Association

Date: Monday, November 13, 1967

Place: Chateau Champlain, Montreal, Quebec

Attendees:

M.J. Messel
R.S. Coleman
K.V. Lindell
R.J. Merrill
P.A. Meyer
W.W. Oughtred
F.P. Smith
F. Bolduc
I.C. Campbell
M.P. Carson
R. Dodds-Hebron
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
D. Poirier
L. Piuze
M. Prus
P.H. Riordon
G. Robinson
I. Sabourin
P.A. Filteau

104th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 15, 1968

Place: Chateau Frontenac, Quebec

Attendees:

M.J. Messel
R.S. Coleman
K.V. Lindell
J.A. Main
R.J. Merrill
P.A. Meyer
W.W. Oughtred

F.P. Smith
F. Bolduc
J.O. Eby
J.R.M. Hutcheson
D. Poirier
Geo. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Uniform, Classification & Grading Committee of the QAMA

Date: March 7, 1968

Place:

Attendees:

R. Merrill
V. Lindsay
L. Montpetit
J.P. Wiser
J.C. Blais
R. Dodds-Hebron
R. Gale
W.H. Foster

Special Meeting of the Quebec Asbestos Mining Association

Date: March 21, 1968

Place: QAMA

Attendees:

W.W. Oughtred
K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
P.A. Meyer
F.P. Smith
I. Sabourin

104th Meeting And The 1968 Annual Meeting Of The Quebec Asbestos Mining Association

Date: Monday, January 15, 1968

Place: Chateau Frontenac, Quebec

Attendees:

M.J. Messel
R.S. Coleman
K.V. Lindell
J.A. Main
R.J. Merrill

P.A. Meyer
W.W. Oughtred
F.P. Smith
F. Bolduc
J.O. Eby
J.R.M. Hutcheson
D. Poirier
Geo. Robinson
I. Sabourin
P.A. Filteau

Special Winter Meeting - Legislation & Taxation Committee Report of the QAMA

Date: March 27-30, 1968
Place: Grand Bahama Hotel & Country Club

Special Meeting of the Quebec Asbestos Mining Association

Date: Thursday, March 28 and 29, 1968
Place: Grand Bahama Hotel & Country Club, G.B.

Attendees:

W.W. Oughtred
K.V. Lindell
J.A. Main
R.J. Merrill
M.J. Messel
P.A. Meyer
F.P. Smith
A.H. Bagenstose
R.D. Bradford
C.B. Burnett
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
A.R. Fisher
W.H. Foster
G.G. Gabrielson
R.P. Gagnon
N.W. Hendry
J.R.M. Hutcheson
J.A.D. Marcotte
R.N. Moore
A.L. Penhale
L. Piuze
D. Poutiatine

G.W. Smith
G. Robinson
I. Sabourin
P.A. Filteau

105th Meeting Of The Quebec Asbestos Mining Association

Date: Friday, May 31, 1968

Place: Bonaventure Hotel, Montreal, Quebec

Attendees:

W.W. Oughtred
K.V. Lindell
R.S. Coleman
R.J. Merrill
M.J. Messel
P.A. Meyer
F.P. Smith
F. Bolduc
I.C. Campbell
Y. Couture
R. Dodds-Hebron
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
D. Poirier
P.H. Riordon
E. Wiber
Geo. Robinson
I. Sabourin
P.A. Filteau

Meeting of the Uniform, Classification & Grading Committee of the QAMA

Date: July 3, 1968

Place:

Attendees:

G.F.A. Brink
J.P. Wiser
V. Lindsay
R. Gale
R. Dodds-Hebron

106th Meeting Of The Quebec Asbestos Mining Association

Date: Tuesday, July 30, 1968

Place: Bonaventure Hotel, Montreal, Quebec

Attendees:

W.W. Oughtred
K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
P.A. Meyer
F.P. Smith
F. Bolduc
I.C. Campbell
R. Dodds-Hebron
W.H. Foster
J.R.M. Hutcheson
H.S. Jobbins
D. Poirier
P.H. Riordon
I. Sabourin
P.A. Filteau

Special Summer Meeting - Legislation and Taxation Committee Report of the QAMA

Date: September 19-22, 1968

Place: Castle Harbor Golf & Beach Club

Special Meeting of the Quebec Asbestos Mining Association

Date: September 20-21, 1968

Place: Castle Harbour Beach and Golf Club, Bermuda

Attendees:

W.W. Oughtred
K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
P.A. Meyer
F.P. Smith
A.H. Bagenstose
R.D. Bradford
C.B. Burnett
I.C. Campbell
D.T. Colton
J.D. Christian
R. Dodds-Hebron
J.W. Duncan

J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
R. Hennebach
J.R.M. Hutcheson
D. Poirier
D. Poutiatine
P.H. Riordon
G.W. Smith
W.J.W. Smith
G. Robinson
I. Sabourin
P.A. Filteau

Meeting of Uniform, Classification & Grading Committee of the QAMA

Date: November 20, 1968

Place:

Attendees:

D. Poirier
J.P. Wiser
J. Eby
V. Lindsay
R. Dodds-Hebron
R. Coleman
R. Merrill
G.F.A. Brink
W.H. Foster

107th Meeting of the Quebec Asbestos Mining Association

Date: Monday, November 25, 1968

Place: Chateau Frontenac, Quebec City

Attendees:

W.W. Oughtred
K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
F.P. Smith
I.C. Campbell
Y. Couture
R. Dodds-Hebron
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
L. Piuze
D. Poirier

M. Prus
P.H. Riordon
E. Weber
Geo. Robinson
I. Sabourin
Paul A. Filteau

108th Meeting Of The Quebec Asbestos Mining Association

Date: Tuesday, January 28, 1969
Place: Mount Royal Hotel, Montreal, P.Q.
Attendees:

K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
L. Piuze
D. Poirier
P.H. Riordon
Geo. Robinson
I. Sabourin
P.A. Filteau

109th Meeting Of The Quebec Asbestos Mining Association

Date: Tuesday, March 25, 1969
Place: Mount Royal Hotel, Montreal, P.Q.
Attendees:

K.V. Lindell
R.S. Coleman
J.A. Main
M.J. Messel
W.W. Oughtred
F.P. Smith
I.C. Campbell
M.C. Carpenter
R. Dodds-Hebron
J.O. Eby
W.H. Foster
D. Poirier
M. Prus
P.H. Riordon
Geo. Robinson

**I. Sabourin
P.A. Filteau**

Special Meeting of the Quebec Asbestos Mining Association

Date: Friday, April, 18, 1969
Place: Belleview-Biltmore, Clearwater, Florida
Attendees:

**K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
A.H. Bagenstose
R.M. Bateman
R.D. Bradford
C.B. Burnett
I.C. Campbell
J.D. Christian
D.T. Colton
Y. Couture
R. Dodds-Hebron
J.W. Duncan
J.O. Eby
A.R. Fisher
W.H. Foster
R.P. Gagnon
N.W. Hendry
H. Hennebach
J.R.M. Hutcheson
E.J. Killian
L.C. Piuze
D. Poutiatine
P.H. Riordon
G.W. Smith
W.J.W. Smith
G. Robinson
I. Sabourin
P.A. Filteau**

111th Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, July 31, 1969
Place: Asbestos, P.Q.
Attendees:

**K.V. Lindell
R.S. Coleman**

J.A. Main
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
Y. Couture
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
Geo. Robinson
I. Sabourin
P.A. Filteau

111th Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, July 31, 1969

Place: Asbestos, P.Q.

Attendees:

K.V. Lindell
R.S. Coleman
J.A. Main
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
Y. Couture
J.O. Eby
W.H. Foster
J.R.M. Hutcheson
Geo. Robinson
I. Sabourin
P.A. Filteau

Special Fall Meeting of the Quebec Asbestos Mining Association

Date: October 7-10, 1969

Place: Seigniory Club - Montebello, Quebec

Attendees:

W.W. Oughtred
J.A. Sargent
I.C. Campbell
W.H. Foster
M.P. Carson
Dr. Paul Cartier
F.P. Smith
R. Dodds-Hebron
C.B. Burnett
D.T. Colton
H.M. Ball

K.V. Lindell
J.O. Eby
N.W. Hendry
J.R.M. Hutcheson
Y. Couture
R.J. Merrill
A.H. Bagenstose
M. Prus
J.A. Main
M.C. Carpenter
A.R. Hooker
D. Poirier
R.L. Hennebach
M.J. Messel
L.C. Piuze
R.P. Gagnon
E.J. Killian
R.S. Coleman
G.W. Wright
J.C. McDonald
George Robinson
I. Sabourin
P.A. Filteau

Minutes of the Special Meeting

Date: Wednesday, October 8, 1969
Place: Seigniory Club, Montebello, P.Q.
Attendees:

K.V. Lindell
M.C. Carpenter
R.S. Coleman
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
H.M. Ball
C.B. Burnett
I.C. Campbell
M.P. Carson
P. Cartier (Dr.)
D.T. Colton
Y. Couture
A.R. Dannis
R. Dodds-Hebron
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
R.L. Hennebach
A.R. Hooker

J.R.M. Hutcheson
E.W. Jones
J.A. Main
John McCann (Dr.)
J.C. McDonald (Dr.)
L.C. Piuze
D. Poirier
D. Poutiatine
M. Prus
G.W. Wright (Dr.)
Geo. Robinson
I. Sabourin
P.A. Filteau

Meeting of Directors of the Quebec Asbestos Mining Association

Date: Wednesday, October 8, 1969
Place: Seigniory Club, Montebello, P.Q.
Attendees:

K.V. Lindell
M.C. Carpenter
R.S. Coleman
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
H.M. Ball
P.A. Filteau

112th Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, February 12, 1970
Place: Mount Royal Hotel, Montreal, Quebec
Attendees:

K.V. Lindell
M.C. Carpenter
R.S. Coleman
R.J. Merrill
M.J. Messel
W.W. Oughtred
F.P. Smith
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
A.R. Hooker
J.R.M. Hutcheson
L.C. Piuze
D. Poirier
Geo. Robinson

**I. Sabourin
P.A. Filteau**

Special Meeting of the Quebec Asbestos Mining Association

Date: Friday, March 20, 1970
Place: Dorado Hilton Hotel, Dorado, Puerto Rico
Attendees:

**R.J. Merrill
M.C. Carpenter
R.S. Coleman
K.V. Lindell
M.J. Messel
W.W. Oughtred
F.P. Smith
A.H. Bagenstose
C.B. Burnett
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
J.E. DesMarias
R. Dodds-Hebron
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
R.L. Hennebach
A.R. Hooker
J.R.M. Hutcheson
L.C. Piuze
D. Poutiatine
W.J.W. Smith
G.W. Wright
George Robinson
I. Sabourin
P.A. Filteau**

113th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, May 18, 1970
Place: Mount Royal Hotel, Montreal
Attendees:

**R.J. Merrill
R.S. Coleman
K.V. Lindell
M.J. Messel
W.W. Oughtred
F.P. Smith**

I.C. Campbell
R. Dodds-Hebron
J.O. Eby
W.H. Foster
R.P. Gagnon
J.R.M. Hutcheson
D. Poirier
Geo. Robinson
I. Sabourin
P.A. Filteau

114th Meeting Of The Quebec Asbestos Mining Association

Date: Monday, July 27, 1970
Place: Chateau Frontenac, Quebec
Attendees:

R.J. Merrill
M.C. Carpenter
W.W. Oughtred
F.P. Smith
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
W.H. Foster
R.P. Gagnon
A.R. Hooker
D. Poirier
L.C. Piuze
Geo. Robinson
Philippe Casgrain
I. Sabourin
P.A. Filteau

Minutes of Joint Meeting of the Quebec Asbestos Mining Association and the Quebec Asbestos Mining Association Taxation Committees

Date: September 4, 1970
Place: Chateau Frontenac, Quebec City
Attendees:

G.A. McCammon
A.R. Dennis
O. Mousseau
P.A. Filteau
G. Vaillaneant
A.W. Cooper
G.W. Moad
L.G. Langlois
L.C. Beliveau
I.C. Campbell

**D.H. Ford
V. St. Onge**

Special Meeting Of the Quebec Asbestos Mining Association

Date: Thursday, October 8, 1970

Place: Santa Barbara, California

Attendees:

**R.J. Merrill
K.V. Lindell
M.J. Messel
W.W. Oughtred
F.P. Smith
A.H. Bagenstose
C.B. Burnett
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
R.L. Hennebach
J.R.M. Hutcheson
L.C. Piuze
D. Poutiatine
W.J.W. Smith
I. Sabourin
Ph. Casgrain
Geo. Robinson
P.A. Filteau**

114th Meeting of the Quebec Asbestos Mining Association

Date: Monday, July 27, 1970

Place: Chateau Frontenac, Quebec

Attendees:

**R.J. Merrill
M.C. Carpenter
W.W. Oughtred
F.P. Smith
I.C. Campbell
R. Dodds-Hebron
J.O. Eby
W.H. Foster
R.P. Gagnon
A.R. Hooker
D. Poirier
L.C. Piuze**

**Geo. Robinson
Philippe Casgrain
I. Sabourin
P.A. Filteau**

Annual General Meeting of the Quebec Asbestos Mining Association

Date: January 11, 1971

Time: 12:00 p.m.

Place: Mount Royal Hotel, Quebec Suite, Montreal, Quebec

Attendees:

**W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
A.R. Hooker
M.J. Messel
R.S. Coleman
Geo. Robinson
P.A. Filteau
Philippe Casgrain**

115th Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: Monday, January 11, 1971

Time: 10:00 a.m.

Place: Quebec Suite of the Mount Royal Hotel, Montreal

Attendees:

**R.J. Merrill
F.P. Smith
J.R.M. Hutcheson
W.W. Oughtred
M.J. Messel
R.S. Coleman
A.R. Hooker
G. Robinson
P.A. Filteau
P. Casgrain
I.C. Campbell
J.O. Eby
W.H. Foster
R.P. Gagnon
K. Jackson
L.C. Piuze
D. Poirier
I. Sabourin**

Meeting of the Board of Directors of The Quebec Asbestos Mining Association

Date: January 11, 1971

Time: 12:25 p.m.

Place: Mount Royal Hotel, Quebec Suite, Montreal, Quebec

Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
A.R. Hooker
M.J. Messel
R.S. Coleman
P.A. Filteau
Philippe Casgrain

Special General Meeting Of The Quebec Asbestos Mining Association

Date: Friday, March 19, 1971

Place: Pierre Marques Hotel, Acapulco, Mexico

Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
M.C. Carpenter
M.J. Messel
R.S. Coleman
Ph. Casgrain
P.A. Filteau
I.C. Campbell
J.O. Eby
W.H. Foster
R.P. Gagnon
K.V. Lindell
A.H. Bagenstose
M.P. Carson
D.T. Colton
Y. Couture
J.E. DesMarais
N.W. Hendry
R.L. Hennebach
J.B. Jobe
L.C. Piuze
D. Poutiatine
W.J.W. Smith
W.V. VanDerbeek

Annual General Meeting Of The Quebec Asbestos Mining Association

Date: January 11, 1971

Time: 12:00 p.m.

Place: Mount Royal Hotel, Quebec Suite, Montreal, Quebec

Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
A.R. Hooker
M.J. Messel
R.S. Coleman
Geo. Robinson
Paul-A. Filteau
Philippe Casgrain

Meeting of the Board of Directors of The Quebec Asbestos Mining Association

Date: January 11, 1971

Time: 12:45 p.m.

Place: Mount Royal Hotel, Quebec Suite, Montreal, Quebec

Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
A.R. Hooker
M.J. Messel
R.S. Coleman
Paul A. Filteau
Philippe Casgrain

Special Meeting Of The Quebec Asbestos Mining Association

Date: Thursday, October 8, 1970

Place: Santa Barbara Biltmore, Santa Barbara, California

Attendees:

R.J. Merrill
K.V. Lindell
M.J. Messel
W.W. Oughtred
F.P. Smith
A.H. Bagenstose
C.B. Burnett
I.C. Campbell
M.P. Carson
D.T. Colton
Y. Couture
J.O. Eby
W.H. Foster
R.P. Gagnon
N.W. Hendry
R.L. Hennebach

J.R.M. Hutcheson
L.C. Piuze
D. Poutiatine
W.J.W. Smith
I. Sabourin
Ph. Casgrain
Geo. Robinson
Paul A. Filteau

115th Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: Monday, January 11, 1971
Time: 10:00 a.m.
Place: Quebec Suite of the Mount Royal Hotel, Montreal
Attendees:

R.J. Merrill
F.P. Smith
J.R.M. Hutcheson
W.W. Oughtred
M.J. Messel
R.S. Coleman
A.R. Hooker
G. Robinson
P.A. Filteau
P. Casgrain
I.C. Campbell
J.O. Eby
W.H. Foster
R.P. Gagnon
K. Jackson
L.C. Piuze
D. Poirier
I. Sabourin

Special General Meeting Of The Quebec Asbestos Mining Association

Date: Monday, October 11, 1971
Place: Broadmoor, Colorado Springs, Colorado
Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
M.C. Carpenter
M.J. Messel
Ph. Casgrain
P.A. Filteau
I.C. Campbell

J.O. Eby
W.H. Foster
R.P. Gagnon
K.V. Lindell
A.H. Bagenstose
M.P. Carson
D.T. Colton
Y. Couture
E.J. Killian
N.W. Hendry
J.B. Jobe
L.C. Piuze
D. Poutiatine
W.J.W. Smith
W.L. VanDerbeek
M. Dorais
A.R. Hooker
M. Prus
J.D. Christian

119th Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: Monday, January 24, 1972
Time: 10:00 a.m.
Place: Mount Royal Hotel, Montreal
Attendees:

W.W. Oughtred
F.P. Smith
J.R.M. Hutcheson
R.J. Merrill
M.J. Messel
R.S. Coleman
Ph. Casgrain
George McCammon
P.A. Filteau
W.H. Foster
J.O. Eby
R.P. Gagnon
I.C. Campbell
K.V. Lindell
M.P. Carson
M. Dorais
K. Jackson
L.C. Piuze

120th Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: Friday, March 17, 1972
Place: Casa Montego, Montego Bay, Jamaica
Attendees:

J.R.M. Hutcheson
R.J. Merrill
M.J. Messel
R.S. Coleman
W.W. Oughtred
F.P. Smith
Ph. Casgrain
P.A. Filteau
I.C. Campbell
J.O. Eby
R.P. Gagnon
L.C. Piuze
K.V. Lindell
A.H. Bagenstose
R.M. Bateman
M.P. Carson
J.D. Christian
D.T. Colton
M. Dorais
E.J. Killian
N.W. Hendry
R.L. Hennebach
J.B. Jobe
A.S. Johnson
D. Poutiatine
G.W. Smith
W.J.W. Smith
W.L. VanDerbeek
M. Prus
D.L. Shank

The 121st Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: May 29, 1972
Time: 10:00 a.m.
Place: Mount Royal Hotel, Montreal
Attendees:

J.R.M. Hutcheson
R.J. Merrill
M.J. Messel
R.S. Coleman
W.W. Oughtred
F.P. Smith
Ph. Casgrain
P.A. Filteau
W.H. Foster
I.C. Campbell
J.O. Eby
R.P. Gagnon
L.C. Piuze
K.V. Lindell

M.P. Carson
M. Dorais
K. Jackson
M. Prus

The 122nd Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: Friday, October 6, 1972
Place: Palace Hotel, Torquay, England
Attendees:

J.R.M. Hutcheson
R.J. Merrill
M.J. Messel
R.S. Coleman
W.W. Oughtred
M. Dorais
Ph. Casgrain
G.A. McCammon
P.A. Filteau
W.H. Foster
I.C. Campbell
J.O. Eby
R.P. Gagnon
M. Prus
L.C. Piuze
K.V. Lindell
A.H. Bagenstose
R.M. Bateman
E.J. Killien
N.W. Hendry
R.L. Hennebach
W.P. Howard
J.B. Jobe
A.S. Johnson
D. Poutiatine
F.P. Smith
W.J.W. Smith
W.L. VanDerbeek

123rd Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: December 5, 1972
Time: 10:00 a.m.
Place: Chateau Frontenac, Quebec City
Attendees:

J.R.M. Hutcheson
R.J. Merrill
M.J. Messel
R.S. Coleman
M. Dorais

I.C. Campbell
Ph. Casgrain
P.A. Filteau
W.H. Foster
J.O. Eby
R.P. Gagnon
M. Pruis
L.C. Piuze
K.V. Lindell
F.P. Smith

124th Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: January 22, 1973
Time: 10:00 a.m.
Place: Mount Royal Hotel, Montreal
Attendees:

J.R.M. Hutcheson
M.J. Messel
R.S. Coleman
W.W. Oughtred
M. Dorais
M. Pruis
Ph. Casgrain
G.A. McCammon
P.A. Filteau
J.O. Eby
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell

126th Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: May 21, 1973
Time: 10:00 a.m.
Place: Mount Royal Hotel, Montreal
Attendees:

M.J. Messel
R.S. Coleman
M. Dorais
J.R.M. Hutcheson
M. Prus
Ph. Casgrain
G.A. McCammon
P.A. Filteau
J.O. Eby
I.C. Campbell

L.C. Piuze
M.P. Carson
F.P. Smith
Jean Dupéré

127th Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: August 6, 1973
Time: 9:30 a.m.
Place: Iroquois Club, Asbestos
Attendees:

M.J. Messel
R.S. Coleman
W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
Ph. Casgrain
G.A. McCammon
P.A. Filteau
W.H. Foster
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell
W.H. Bonneville

128th Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: Thursday, September 27, 1973
Place: Southampton Princess Hotel, Southampton, Bermuda
Attendees:

M.J. Messel
W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
Ph. Casgrain
P.A. Filteau
W.H. Foster
J.O. Eby
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell
A.H. Bagenstose
M.P. Carson

J.D. Christian
N.W. Hendry
R.L. Hennebach
A.S. Johnson
D. Poutiatine
W.J.W. Smith
P. Steen
W.L. Stribling
W.L. VanDerbeek

Joint Meeting of the Asbestos Information Committee/United Kingdom, Asbestos Information Association/North America and Quebec Asbestos Mining Association

Date: January 24, 1974

Place: Montreal, Canada

Attendees:

C.M. Fenton
D.W. Hills
M.F. Howe
J.H. Marsh
R.H. Mereness
M.J. Messel
I.C. Campbell
R. Michon
Dr. P.V. Pelnar
P.A. Filteau

130th Meeting Of The Directors Of The Quebec Asbestos Mining Association

Date: January 28, 1974

Place: Engineers' Club, Montreal

Attendees:

M.J. Messel
W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
G.A. McCammon
P.A. Filteau
J.O. Eby
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell

131st Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: Thursday, April 4, 1974

Place: Mijas Hotel, Mijas, Spain

Attendees:

W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
M.J. Messel
P. Casgrain
Dr. M. Lesage
P.A. Filteau
J.O. Eby
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell
A.H. Bagenstose
N.W. Hendry
R.L. Hennebach
A.S. Johnson
D. Poutiatine
W.J.W. Smith
W.L. Stribling
W.L. VanDerbeek
J.S. Autry

132nd Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: June 10, 1974

Place: Engineers' Club, Montreal

Attendees:

W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
G.A. McCammon
Dr. M. Lesage
P.A. Filteau
W.H. Foster
D.L. Monroe
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell
R.B. Gresham
K.S. Jackson
W.J.W. Smith

133rd Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: August 16, 1974

Place: ACL Foremen's Club, Thetford Mines, Quebec

Attendees:

W.W. Oughtred
M. Dorais
M. Prus
M.J. Messel
G.A. McCammon
P. Casgrain
Dr. M. Lesage
P.A. Filteau
W.H. Foster
D.L. Monroe
R.B. Gresham
R.P. Gagnon
I.C. Campbell
L.C. Piuze
K.V. Lindell
K.S. Jackson
Jean Dupéré

134th Meeting Of The Directors of the Quebec Asbestos Mining Association

Date: Thursday and Friday, October 3-4, 1974

Place: Casa Blanca Inn, Scottsdale, Arizona

Attendees:

W.W. Oughtred
M. Dorais
J.R.M. Hutcheson
M. Prus
M.J. Messel
P. Casgrain
M. Lesage
P.A. Filteau
R.B. Gresham
R.P. Gagnon
L.C. Piuze
K.V. Lindell
A.H. Bagenstose
N.W. Hendry
R.L. Hennebach
D. Poutiatine
W.J.W. Smith
W.L. Stribling
W.L. VanDerbeek
Dr. G.W. Wright

ATI MEETINGS

Meeting of the Asbestos Textile Institute

Date: September 11, 1959

Place: Essex House, NY

Attendees:

J.T. Griffis
M.J. Scanlan
Edw. Beale
N.W. Hendry
L.R. Hoff
W.S. Hough
J.A. O'Brien
E.A. Schuman
C.C. Simoni
N.L. Barr
W.M. Deckman
C.R. Hutchcroft
A.E. May
D.F. Quealy
A.E. Whitfield
D.W. Widmayer
J.A. Bettes
J.A. Brown
M.W. Oliver
J.F.D. Rohrbach
R.B. Smith
S.R. Zimmerman
R.W. Christenson
F.W. Elliot
G.J. Harris
C.L. Holbert
J.D. McCluer
J.L. Mitchell
G.F. Jenkins
Paul LeClerc
George Smith
F. Parker Smith
J.D. Christian
T.T. Tigert
Carl Bindman
E.A. Farrell
W.R. Whitener
M.I. Ruddock
M.C. Shaw
Maurice Lachance
C.B. Whitley
W.W. Hildinger
J.E. Kelly
C.H. Carlough

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: September 10, 1959

Place: Essex House, NY

Attendees:

C.R. Hutchcroft
L.C. Williams
J.D. McCluer
W.C. Streib
T.T. Tigert
G.F. Jenkins
E.A. Farrell
G. Smith
J.D. Christian

General Meeting of The Asbestos Textile Institute

Date: December 4, 1959

Place: Philadelphia, PA

Attendees:

J.T. Griffis
M.J. Scanlan
J.W. Weber
Edw. Beale
L.R. Hoff
J. Battersby
W.S. Atkinson
E.A. Schuman
W.S. Hough
N.L. Barr
D.F. Quealy
C.R. Hutchcroft
A.E. Whitfield
D.W. Widmayer
R.B. Smith
M.W. Oliver
J.D. McCluer
G.J. Harris
G.W. Jenkins
Paul LeClerc
Geo. Smith
F. Parker Smith
E.A. Farrell
W.R. Whitener
M.I. Ruddock
M.C. Shaw
H.E. Sunbury
S.J. Peele

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: December 3, 1959

Place: Warwick Hotel, Philadelphia, PA

Attendees:

C.R. Hutchcroft
L.C. Williams
J.D. McCluer
I. Barnett
J.D. Malone
E.A. Farrell
G.F. Jenkins
W. Reakes
A.P. Gouveia

General Meeting of the Asbestos Textile Institute

Date: March 4, 1960

Place: Philadelphia, PA

Attendees:

J.T. Griffis
M.J. Scanlan
J.W. Weber
W.C. Atkinson
J. Battersby
Edw. Beale
N.W. Hendry
W.S. Hough
E.A. Schuman
W.C. Streib
W.M. Deckman
C.R. Hutchcroft
D.F. Quealy
A.E. Whitfield
J.D. McCluer
J.L. Mitchell
J.A. Bettes
J.A. Brown
M.W. Oliver
R.B. Smith
A.R. Byrnes
J.E. Cerny
T.C. McCluskey
Mr. Austin
S.J. Peele
H.E. Sunbury
Paul LeClerc
F. Parker Smith
H.A. Smith

T.T. Tigert
A.W.G. Gibb
E.A. Farrell
W.R. Whitener
A.F. Jerome
M.I. Ruddock
M.C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: March 3, 1960
Place: Warwick Hotel, Philadelphia, PA
Attendees:

C.R. Hutchcroft
S. Collier
L.C. Williams
J.D. McCluer
J. Malone
W.C. Streib
T.T. Tigert
W.N. Reakes
E.A. Farrell
H. Smith
W. Whitener

General Meeting of the Asbestos Textile Institute

Date: 1960
Place: Balmoral Motel, Thetford Mines, Canada
Attendees:

E.C. Cutler
Hans Walter
G.F. Jenkins
J.A. Marcotte
I.C. Campbell
F.P. Smith
G.W. Smith
H.A. Smith
J.D. Christian
C.R. Elliott
T.T. Tigert
Chas. Edenfield
F.J. Griffin
W.C. Atkinson
Edw. Beale
J.O. Eby
Noel Hendry
W.S. Hough
E.A. Schuman

I.C. Brooks
E.A. Boadway
R.J. Merrill
F.P. Hodgson
Carl Bindman
A.S. Johnson
N.L. Barr
B.C. Bond
W.M. Deckman
C.R. Hutchcroft
D.F. Quealy
M.J. Messel
J.P. Wiser
Noel Reakes
J.A. Bettles
M.W. Oliver
R.B. Smith
L.C. Williams
J.P. Wronski
J.E. Cerny
T.C. McCluskey, Jr.
D.T. Austin, Jr.
D.S. Nichols
S.J. Peele
M.C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 6, 1960
Place: Chateau Frontenac, Quebec City, Canada
Attendees:

C.R. Hutchcroft
L.C. Williams
I. Barnett
S. Collier
G.F. Jenkins
W.A. Heausler
P.E. Pelletier
T.T. Tigert
E.A. Farrell
A.F. Jerome

General Meeting of the Asbestos Textile Institute

Date: September 9, 1960
Place: Statler Hilton Hotel, New York City
Attendees:

J.W. Weber
G.F. Jenkins

Paul LeClerc
J.A. Marcotte
F. Parker Smith
G.W. Smith
H.A. Smith
R.E. Cryor
J.D. Christian
G.J. Harris
J.D. McCluer
J.L. Mitchell
W.C. Atkinson
Edw. Beale
W.S. Hough
H.M. Jackson
E.A. Schuman
A.W.G. Gibb
N.L. Barr
L.D. Horowitz
C.R. Hutchcroft
D.F. Quealy
A.E. Whitfield
E.A. Farrell
J.A. Bettes
J.A. Brown
M.W. Oliver
R.B. Smith
R.S. Tallman
D.T. Austin
D.S. Nichols
S.J. Peele
H.E. Sunbury
M.I. Ruddock
M.C. Shaw
J.A. O'Brien
C.H. Carlough
H.G. Donovan
B.D. Hubbard
G.S. Malinson
V.C. McQuiddy
R.R. Porter
J.F.D. Rohrbach
M.Q. Scowcroft
C.C. Simoni

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: September 8, 1960
Place: Hotel Statler Hilton, New York City
Attendees:

C.R. Hutchcroft
L.C. Williams
J.D. McCluer

I. Barnett
G.F. Jenkins
G.W. Smith
H.A. Smith
E.A. Farrell
J.D. Christian
T.T. Tigert

General Meeting of the Asbestos Textile Institute

Date: December 16, 1960
Place: Warwick Hotel, Philadelphia, PA
Attendees:

J.A. Weber
Paul LeClerc
H.A. Smith
A.F. Jerome
T.T. Tigert
J.D. McCluer
J.T. Griffis
W.C. Atkinson
E.A. Schuman
A.W.G. Gibb
W.M. Deckman
C.R. Hutchcroft
D.F. Quealy
A.E. Whitfield
E.A. Farrell
E.L. Rimbault
J.A. Bettes
J.A. Brown
M.W. Oliver
R.B. Smith
T.C. McCluskey
D.T. Austin, Jr.
S.J. Peele, Jr.
H.E. Sunbury
M.I. Ruddock
M.C. Shaw
S.C. Gehman

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: December 15, 1960
Place: Hotel Warwick, Philadelphia, PA
Attendees:

L.C. Williams
H.A. Smith
W.N. Reakes

T.T. Tigert
A.F. Jerome
E.A. Farrell
J.A. Malone
Mr. Kossuth
C.R. Hutchcroft

General Meeting of the Asbestos Textile Institute

Date: March 3, 1961

Place: Barbizon-Plaza Hotel, New York

Attendees:

W.S. Hough
M.J. Scanlan
G.F. Jenkins
Paul LeClerc
G.W. Smith
F. Parker Smith
A.F. Jerome
J.T. Griffis
J.D. McCluer
J.T. Mitchell
W.C. Atkinson
E.A. Beale
J.C. Battersby
A.B. Curtis
E.A. Schuman
Carl Bindman
W.M. Deckman
C.R. Hutchcroft
L.D. Horowitz
D.F. Quealy
A.E. Whitfield
E.A. Farrell
E.L. Rimbault
J.A. Bettes, Jr.
J.A. Brown
M.W. Oliver
H.E. Palm
R.B. Smith
L.C. Williams
D.T. Austin
D.S. Nichols
S.J. Peele
H.E. Sunbury
M.I. Ruddock
M.C. Shaw
Stanley B. Hunt

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: March 2, 1961
Place: Barbizon-Plaza Hotel, New York
Attendees:

C.R. Hutchcroft
S. Collier
J.D. McCluer
L.C. Williams
G.F. Jenkins
W.A. Heausler
G.W. Smith
A.F. Jerome
E.A. Farrell
C. Bindman
W.C. Streib
I. Barnett
P. LeClerc

General Meeting of the Asbestos Textile Institute

Date: June 9, 1961
Place: Philadelphia, PA
Attendees:

A.E. Whitfield
M.J. Scanlan
J.A. Marcotte
Paul LeClerc
R. Dodds-Hebron
H.A. Smith
F. Parker-Smith
A.F. Jerome
J.D. Christian
T.T. Tigert
J.T. Griffis
J.L. Mitchell
W.C. Atkinson
Edw. Beale
J.C. Battersby
N.W. Hendry
E.A. Schuman
K.W. Smith
C. Sheckler
A.W.G. Gibb
John A. McCannon
N.L. Barr
W.M. Deckman
C.R. Hutchcroft
L.D. Horowitz
D.F. Quealy
E.A. Farrell
E.L. Rimbault
J.A. Bettes
J.A. Brown

R.B. Smith
D.T. Austin
D.S. Nichols
S.J. Peele
H.E. Sunbury
Bradley Walls
M.C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 8, 1961

Place: Warwick Hotel, Philadelphia, PA

Attendees:

C.R. Hutchcroft
S. Collier
J.D. McCluer
L.C. Williams
H.A. Smith
D.A. Kossuth
A.F. Jerome
E.A. Farrell
T.T. Tigert
J.A. Malone
R. Dodds-Hebron
Paul LeClerc
A.B. Cummins
W.C. Streib
I. Barnett

General Meeting of the Asbestos Textile Institute

Date: December 8, 1961

Place: Hotel Warwick, Philadelphia, PA

Attendees:

W.S. Hough
M.J. Scanlan
G.F. Jenkins
P.E. LeClerc
A.C. Steele
V.H. Tower
F.P. Smith
G.W. Smith
A.F. Jerome
J.D. Christian
J.T. Griffis
G.J. Harris
J.L. Mitchell
J.D. McCluer
N.W. Hendry
E.A. Schuman

C.L. Sheckler
A.W.G. Gibb
B.C. Bond
W.M. Deckman
L.D. Horowitz
C.R. Hutchcroft
E.A. Farrell
J.A. Brown, Jr.
R.B. Smith
D.T. Austin
S.J. Peele, Jr.
H.E. Sunbury
Bradley Walls
M.C. Shaw
Howard T. Bain
Bertram W. Zumeta

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: December 7, 1961
Place: Warwick Hotel, Philadelphia, PA
Attendees:

C.R. Hutchcroft
J.D. McCluer
L.C. Williams
G.F. Jenkins
E.A. Farrell
J.D. Christian
D.A. Kossuth
J.A. Malone
I. Barnett

Meeting of the Asbestos Textile Institute

Date: September 8, 1961
Place: Park Sheraton Hotel, New York City
Attendees:

W.S. Hough
M.J. Scanlan
M.P. Carson
G.F. Jenkins
Vaughn Tower
G.W. Smith
F.P. Smith
A.F. Jerome
J.D. Christian
T.T. Tigert
P.A. Benke
J.T. Griffis

J.T. Mitchell
J.D. McCluer
Edw. Beale
E.A. Schuman
K.W. Smith
C.L. Sheckler
C.C. Simoni
Carl Bindman
N.L. Barr
W.M. Deckman
C.R. Hutchcroft
L.D. Horowitz
R.R. Porter
D.F. Quealy
A.E. Whitfield
E.A. Farrell
J.A. Bettles, Jr.
M.W. Oliver
J.F.D. Rohrbach
R.B. Smith
M.Q. Scowcroft
S.R. Zimmerman, Jr.
T.C. McCluskey
R.S. Tallman
R.A. All
D.T. Austin
W.E. Clark
D.S. Nichols
S.J. Peele
H.E. Sunbury
W.J. Moss
Bradley Walls
M.C. Shaw
D.F. Houlihan
G. Perry Wiess

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: September 7, 1961

Place:

Attendees:

C.R. Hutchcroft
S. Collier
J.D. McCluer
L.C. Williams
G.F. Jenkins
E.A. Farrell
T.T. Tigert
J.D. Christian
G.W. Smith
W.N. Reakes
D.A. Kossuth
I. Barnett

Meeting of the Asbestos Textile Institute

Date: June 8, 1962

Place: Seaview Country Club, Absecon, NJ

Attendees:

W.S. Hough
M.J. Scanlan
Hans Walters
A.E. Whitfield
G.F. Jenkins
V.H. Tower
F.P. Smith
J.L. Mitchell
J.D. McCluer
Frank Williams
W.C. Atkinson
E.A. Schuman
C.L. Sheckler
J.L. Tucker
W.M. Deckman
P.L. Cevoli
D.F. Quealy
E.A. Farrell
D.A. Kossuth
J.A. Bettles, Jr.
R.B. Smith
D.S. Nichols
S.J. Peele, Jr.
Bradley Walls
Myril C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 7, 1962

Place: Seaview Country Club, Absecon, New Jersey

Attendees:

L.C. Williams
D.H. Kossuth
G.F. Jenkins
E.A. Farrell
F. Parker-Smith

General Meeting of the Asbestos Textile Institute

Date: September 14, 1962

Place: Hotel Commodore, New York

Attendees:

J.W. Weber
D.F. Quealy
J. Rainey
M.P. Carson
J.F. Jenkins
F.P. Smith
J.D. Christian
T.T. Tigert
J.T. Griffis
J.L. Mitchell
W.C. Atkinson
N.W. Hendry
E.A. Schuman
J.L. Tucker
J. McCammon
E.A. Farrell
A.F. Jerome
J.A. Bettes
M.W. Oliver
H.E. Palm
R.B. Smith
L.C. Williams
D.T. Austin
S.J. Peele
Bradley Walls
Myril C. Shaw
R.A. All
H.G. Donovan
L.D. Horowitz
J. Kennedy
Edmund Ladendorff
J.F.D. Rohrbach
C.C. Simoni
S.R. Zimmerman, Jr.

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: September 13, 1962

Place: Hotel Commodore

Attendees:

I. Barnett
L.C. Williams
G.F. Jenkins
E.A. Farrell
J.D. Christian
T.T. Tigert
A.F. Jerome
M.P. Carson
M.C. Shaw

General Meeting of the Asbestos Textile Institute

Date: January 25, 1963

Place: Hotel Warwick, Philadelphia, PA

Attendees:

D.F. Quealy
J.L. Rainey
J.W. Weber
A.E. Whitfield
M.P. Carson
J.F. Jenkins
V.H. Tower
F.P. Smith
G.W. Smith
Wm. Smith
J.A. Christian
T.T. Tigert
Dewey Childers
J.T. Griffis
J.L. Mitchell
J.D. McCluer
W.C. Atkinson
I. Barnett
Mr. Connor
N.W. Hendry
W.S. Hough
C.L. Sheckler
J.L. Tucker
A.W.G. Gibb
E.A. Farrell
J.A. Brown, Jr.
J.W. Hawkins
M.W. Oliver
L.C. Williams
T.C. McCluskey
W.M. Deckman
D.T. Austin, Jr.
D.S. Nichols
W.C. Moss
G.D. Reycraft
M.C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: January 24, 1963

Place: Warwick Hotel, Philadelphia, PA

Attendees:

I. Barnett
L.C. Williams

G.F. Jenkins
E.A. Farrell
J.D. Christian
T.T. Tigert
M.P. Carson
F.P. Smith
G.W. Smith
A.P. Gouveia

General Meeting of the Asbestos Textile Institute

Date: June 7, 1963

Place: Barbizon-Plaza Hotel, New York City

Attendees:

S.J. Peele, Jr.
D.F. Quealy
W. Maaskant
J.W. Christenbury
J.L. Rainey
G.F. Jenkins
J.A.D. Marcotte
A.C. Steele
P.E. LeClerc
G.W. Smith
A.J. Jerome
J.D. Christian
T.T. Tigert
J.T. Griffis
J.L. Mitchell
G.D. Reycraft
E.A. Schuman
W.C. Atkinson
J.L. Tucker
W.S. Hough
J. McCammon
E.A. Farrell
J.A. Bettes, Jr.
J.A. Brown, Jr.
M.W. Oliver
R.B. Smith
L.C. Williams
W.M. Deckman
D.T. Austin, Jr.
D.S. Nichols
M.C. Shaw
Douglas Garland
W.E. Clark
Chapin Hoskins
V.C. McQuiddy, Jr.
R.A. All

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 6, 1963

Place: Barbizon-Plaza Hotel, New York, New York

Attendees:

I. Barnett
L.C. Williams
G.F. Jenkins
E.A. Farrell
J.D. Christian
T.T. Tigert
G.W. Smith
R. Dodds-Hebron

General Meeting of the Asbestos Textile Institute

Date: October 4, 1963

Place: Barbizon-Plaza Hotel, New York, New York

Attendees:

J.W. Weber
D.F. Quealy
W. Maaskant
J.W. Christenbury
J.L. Rainey
H.V. Walter
G.F. Jenkins
M.P. Carson
F.P. Smith
Wm. J.W. Smith
T.T. Tigert
J.T. Griffis
J.L. Mitchell
J.D. McCluer
G.D. Reycraft
W.S. Hough
E.A. Schuman
W.C. Atkinson
J.L. Tucker
I. Barnett
J.A. McCammon
E.L. Rimbault, Jr.
E.A. Farrell
J.A. Bettes, Jr.
J. Wronski
M.W. Oliver
R.B. Smith
L.C. Williams
J.W. Hawkins
M.Q. Scowcroft

W.M. Deckman
D.T. Austin, Jr.
D.S. Nichols
H.E. Sunbury
J.F.D. Rohrbach
S.R. Zimmerman, Jr.
W.E. Clark
Claude Allard
V.C. McQuiddy, Jr.
B.D. Hubbard
Douglas F. Roberts
M.C. Shaw

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: October 3, 1963
Place: Barbizon-Plaza Hotel, New York, New York
Attendees:

I. Barnett
L.C. Williams
G.F. Jenkins
T.T. Tigert
E.A. Farrell
J.W. Hawkins

General Meeting of the Asbestos Textile Institute

Date: February 7, 1964
Place: Barbizon-Plaza Hotel, New York City
Attendees:

S.J. Peele, Jr.
J.W. Weber
D.F. Quealy
W. Maaskant
J.W. Christenbury
J.L. Rainey
H.H. Walter
A.C. Steele
E.L. Alexander
Wm. J.W. Smith
J.D. Christian
T.T. Tigert
R. Marson
J.T. Griffis
J.D. McCluer
A.P. Gouveia
G.D. Reycraft
Jay Flocken
W.S. Hough

E.A. Schuman
W.C. Atkinson
I. Barnett
A.W.G. Gibb
E.A. Farrell
J.A. Bettles, Jr.
J. Wronski
L.C. Williams
M.W. Oliver
R.B. Smith
J.W. Hawkins
T.C. McCluskey
W.M. Deckman
D.T. Austin, Jr.
G.J. Sligh
H.W. Sunbury
Hal E. Brockmann
V.C. McQuiddy, Jr.
W.A. Singleterry
B.D. Hubbard
Kenneth W. Smith
Lewis J. Cralley

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: February 6, 1964
Place: Barbizon-Plaza Hotel, New York City
Attendees:

I. Barnett
J.D. McCluer
E.A. Farrell
J.W. Hawkins
J.D. Christian
T.T. Tigert
J. Wronski
N.W. Edgerton
R. Marson

General Meeting of the Asbestos Textile Institute

Date: October 9, 1964
Place: Barbizon-Plaza Hotel, New York City
Attendees:

J.L. Rainey
J.W. Christenbury
Wm. Maaskant
D.F. Quealy
H. H. Walter

G.F. Jenkins
A.C. Steele
E.L. Alexander
F.P. Smith
G.W. Smith
Wm. J.W. Smith
R. Dodds-Hebron
J.D. Christian
T.T. Tigert
W.S. Hough
E.A. Schuman
W.C. Atkinson
I. Barnett
C.L. Sheckler
E.A. Farrell
G.D. Reycraft
J.T. Griffis
A.P. Gouveia
J.D. McCluer
D.E. Childers
J.A. Bettes, Jr.
J.A. Brown, Jr.
L.C. Williams
J.P. Wronski
J.W. Hawkins
M.W. Oliver
R.B. Smith
M.Q. Scowcroft
Ted D. McCluskey
Bernard Lincoln
W.M. Deckman
S.J. Peele, Jr.
D.T. Austin, Jr.
G.J. Sligh
H.E. Sunbury
H.B. (Doc) Sharer
J.F.D. Rohrbach
C.H. Carlough
G.S. Fabel
J.G. Schoepf
A.E. Whitfield
M.C. Shaw
F.T. Gatke
E.H. Wells
Dr. L.J. Cralley
Dr. J.H. Wolfsie
R.A. All
H.M. Jackson
J.L. Tucker
G.E. Houghton
J.J. Sly
K.O. Renz
P.A. Filteau
G.R. Munger

B.D. Hubbard
D.S. Nichols
S.A. Abrahams
D.A. Caruso

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: October 8, 1964
Place: Barbizon-Plaza Hotel, New York City
Attendees:

I. Barnett
D. Childers
J.W. Hawkins
E.A. Farrell
R. Dodds-Hebron
G.F. Jenkins
T.T. Tigert
J. Wronski
B. Lincoln
W.P. Archer

General Meeting Asbestos Textile Institute

Date: June 4, 1965
Place: Motel Le Provence, Thetford Mines, Canada
Attendees:

J.W. Weber
J.L. Rainey
G.S. Fabel
J.W. Christenbury
Wm. Maaskant
D.F. Quealy
G.F. Jenkins
P.E. LeClerc
E.L. Alexander
W.W. Oughtred
M.P. Carson
A.L. Penhale
G.F.A. Brink
M.C. Pharo
G.W. Smith
F.P. Smith
Wm. J.W. Smith
R. Dodds-Hebron
Norman L. Barr
J.D. Christian
W. Gritzuk
T.T. Tigert
R. Marson

W.S. Hough
E.A. Schuman
W.C. Atkinson
C.L. Sheckler
Dr. K.W. Smith
M.J. Messel
E.A. Farrell
K.W. Nelson
J.T. Griffis
J.D. McCluer
D.E. Childers
J.A. Brown, Jr.
L.C. Williams
J.P. Wronski
M.W. Oliver
R.B. Smith
J.W. Hawkins
Ted D. McCluskey
Bernard Lincoln
A.C. Link
D.T. Austin, Jr.
S.J. Peele, Jr.
B.D. Hubbard
J.H. Wolfsie
J.L. Mitchell
P. Jay Flocken
H.E. Sunbury
Monsieur Collineau
Monsieur Decaestecker
Dr. L.J. Cralley
M.W. Hendry
Karl V. Lindell
J.O. Eby
R. Gagnon
L. Piuze
M.J. Messel
A.L. Penhale
G.F. Jenkins
L. Montpetit
Ivan Sabourin
C.B. Brown
J.A.D. Marcotte
Dr. R.J. Merrill
F.P. Hodgson
M. Lachance
R.S. Coleman
Dr. L.J. Cralley
Dr. K.W. Smith
Dr. J.H. Wolfsie
Mr. N.L. Barr
Dr. R. Marson
N. Gritzuk
Dr. Paul Cartier
Geo S. Fabel

A. Collineau
M. Decaestecker

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 4, 1965

Place: Motel LeProvence, Thetford Mines, Quebec, Canada

Attendees:

J. Wronski
D.E. Childers
R. Dodds-Hebron
E.A. Farrell
B. Lincoln
M.C. Pharo
T.T. Tigert

General Meeting of the Asbestos Textile Institute

Date: June 9, 1967

Place: Lucerne Motel, Montreal, Canada

Attendees:

J.L. Rainey
Wm. Maaskant
D.F. Quealy
J.W. Christenbury
G.S. Fabel
C.E. Houghton
E.A. Schuman
W.C. Atkinson
I. Barnett
W.C. Streib
C.L. Sheckler
J.A. Gallagher
J.D. McCluer
D.E. Childers
J.A. Brown, Jr.
L.C. Williams
J.P. Wronski
R.B. Smith
J.W. Hawkins
S.J. Peele, Jr.
R.P. Clark
D.T. Austin, Jr.
H.M. Willingham
M.P. Carson
P.E. LeClerc
G.F.A. Brink

Wm. J.W. Smith
R. Dodds-Hebron
Walter Smith
G.W. Smith
N.W. Hendry
E.A. Farrell
R.P. Gagnon
J.D. Christian
W.M. Deckman
B. Lincoln
J.L. Mitchell
P. Jay Flocken
H.E. Sunbury
Norman L. Barr
J.A. Morton
P.J. Smith
H.R. Lynch
Geo. J. Harris
J.A. Bettes, Jr.

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: June 8-9, 1967
Place: Lucerne Motel, Montreal Canada
Attendees:

G.F.A. Brink
D.E. Childers
J.D. Christian
R. Dodds-Hebron
E.A. Farrell
B. Lincoln
W. Smith
W.C. Streib
J. Wronski

General Meeting of the Asbestos Textile Institute

Date: October 6, 1967
Place: William Hilton Inn, Hilton Head Island, South Carolina
Attendees:

J.L. Rainey
J.W. Christenbury
Wm. Maaskant
G.S. Fabel
H.H. Walter
N.L.A. Martucci
E.H. Wells
E.A. Schuman
W.C. Atkinson

C.L. Sheckler
W.C. Streib
J.A. Gallagher
J.D. McCluer
D.E. Childers
W.S. Simpson
S.R. Zimmerman, Jr.
J.A. Brown, Jr.
G.F. Ducker
M.W. Oliver
J.W. Hawkins
M.Q. Scowcroft
R.B. Smith
J.P. Wronski
J.L. Mitchell
R.P. Clark
D.T. Austin, Jr.
W.M. Willingham
S.J. Peele, Jr.
F.C. Phillips
W.L. Wylie
M.P. Carson
G.F.A. Brink
P.E. LeClerc
Wm. J.W. Smith
R. Dodds-Hebron
E.A. Farrell
K.W. Nelson
P. Jay Flocken
H.E. Sunbury
Dr. L.J. Cralley

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: October 5-6, 1967
Place: William Hilton Inn, Hilton Head Island, S.C.
Attendees:

G.F.A. Brink
D.E. Childers
R. Dodds-Hebron
E.A. Farrell
W.C. Streib
J. Wronski

General Meeting of the Asbestos Textile Institute

Date: February 9, 1968
Place: Hotel Roosevelt, New York, NY
Attendees:

J.L. Rainey
J.W. Christenbury
H.H. Walter
D.F. Quealy
Wm. Maaskant
N.L.A. Martucci
G.E. Houghton
Alex Kuzmuk
E.H. Wells
E.A. Schuman
W.C. Streib
C.L. Sheckler
R. Hindmarch
P.A. Rogers
N.W. Hendry
W.S. Hough
E.M. Nesvig
Geo. Bohrer
L.E. Moody
J.D. McCluer
D.E. Childers
J.W. Echerd
G.J. Harris
M.Q. Scowcroft
J.P. Wronski
L.C. Williams
J.W. Hawkins
J.A. Bettes, Jr.
Dr. J.L. Goodman
H.E. Sunbury
P.J. Smith
J.L. Mitchell
R.P. Clark
A.C. Link
D.T. Austin, Jr.
E.A. Morris
W.C. Hitchcock
Dr. J.H. Wolfsie
R. Roderic
M.P. Carson
G.F.A. Brink
P.E. LeClerc
Wm. J.W. Smith
R. Dodds-Hebron
C.H. Schoch
W.H. Smith
T.T. Tigert
E.A. Farrell
B. Lincoln
P. Jay Flocken
P.O. Nicodemus
Dr. L.J. Cralley
W.M. Deckman
D.F. Roberts

David A. Caruso
Mrs. T.T. Tigert
Mrs. N.L.A. Martucci

General Meeting of the Asbestos Textile Institute

Date: October 4, 1968

Place: Hotel Hershey, Hershey, PA

Attendees:

J.W. Weber
J.L. Rainey
G.S. Fabel
H.H. Walter
J.W. Christenbury
Wm. Maaskant
G.E. Houghton
S.G. Dixit
E.H. Wells
R.M. Billings
W.P. Raines
E.A. Schuman
C.L. Sheckler
E.M. Fenner
I. Barnett
W.C. Seeds
W.C. Streib
N.W. Hendry
L.E. Moody
J.D. McCluer
D.E. Childers
G.J. Harris
J.W. Echerd
J.A. Brown, Jr.
M.Q. Scowcroft
J.W. Hawkins
L.C. Williams
R.B. Smith
J.P. Wronski
J.A. Bettes, Jr.
A.R. Patterson
M.P. Carson
P.E. LeClerc
G.F.A. Brink
Wm. J.W. Smith
R.J. Dodd-Hebron
J.G. Berry
E.A. Farrell
C.E. Stiefken
B. Lincoln
P. Jay Flocken
Dr. L.J. Cralley

R.P. Clark
R.C. Hunt
D.T. Austin, Jr.
H.M. Willingham
E.A. Morris
Dr. J.G. Wells
H.E. Sunbury
Miss Edith E. Cox
Mr. A.G. Matamoros
Mr. D.R. Holmes
Mr. C.J. Stover

General Meeting of the Asbestos Textile Institute

Date: February 7, 1969
Place: Grand Hotel, Point Clear, Alaska
Attendees:

J.L. Rainey
J.W. Christenbury
H.H. Walter
G.E. Houghton
R.E. Moore
E.A. Schuman
C.L. Sheckler
W.C. Seeds
W.C. Atkinson
L.E. Moody
J.D. McCluer
M.Q. Scowcroft
J.W. Hawkins
A.R. Patterson
R.B. Smith
Dr. J.L. Goodman
J.L. Mitchell
R.C. Hunt
D.T. Austin, Jr.
R.P. Clark
H.M. Willingham
E.A. Morris
P.E. LeClerc
Wm. J.W. Smith
W.H. Smith
Dr. R. Kuntze
R.P. Gagnon
E.A. Farrell
K.W. Nelson
W.M. Deckman
B. Lincoln
H.C. Roosevelt
H.W. Sunbury
R.C. Hunt

D.T. Austin, Jr.
R.P. Clark
H.M. Willingham
E.A. Morris
J.W. Frampton
C.D. Colson
F.C. Phillips
J.W. Bolmeyer

General Meeting of the Asbestos Textile Institute

Date: October 10, 1969

Place: The Carolina, Pinehurst, North Carolina

Attendees:

J.L. Rainey
J.W. Christenbury
H.H. Walter
G.S. Fabel
G.E. Houghton
S.G. Dixit
A. Kuzmuk
E.A. Schuman
R.M. Billings
C.L. Sheckler
I. Barnett
K.A. Roberts
L.E. Moody
D.E. Childers
J.W. Echerd
M.Q. Scowcroft
S.R. Zimmerman, Jr.
G.F. Ducker
M.W. Oliver
R.B. Smith
J.W. Hawkins
J.A. Brown, Jr.
P.E. LeClerc
G.F.A. Brink
Wm. J.W. Smith
W.H. Smith
E.A. Farrell
Bernard Lincoln
W.M. Deckman
J.K. Whittaker
Geo. Griswold, Jr.
D.J. Frost
A.T. Austin, Jr.
R.P. Clark
F.C. Phillips
E.A. Morris

R.C. Hunt
H.C. Roosevelt
H.E. Sunbury
J.T. Griffis
J.D. McCluer
W.C. Atkinson
W.H. Johnson
J.S. Hassenburg

Meeting of the Fiber Testing Committee Meeting of the Asbestos Textile Institute

Date: October 9, 1969

Place: The Carolina Hotel, Pinehurst, N.C.

Attendees:

G.F.A. Brink
D.E. Childers
E.A. Farrell
Bernard Lincoln
D.J. Frost
W.H. Smith

General Meeting of the Asbestos Textile Institute

Date: February 6, 1970

Place: The Regency Hyatt House, Atlanta, GA

Attendees:

J.W. Christenbury
G.E. Houghton
S.G. Dixit
A. Kuzmuk
E.A. Schuman
C.L. Sheckler
K.A. Roberts
L.E. Moody
D.E. Childers
J.W. Echerd
M.Q. Scowcroft
R.B. Smith
J.W. Hawkins
C.F. Ducker
I.H. Weaver
P.E. LeClerc
G.F.A. Brink
Wm. J.W. Smith
W.H. Smith
E.A. Farrell
C.E. Stiefken
J.K. Whittaker

Geo. Griswold, Jr.
E.A. Morris
Dr. J.H. Wolfsie
H.C. Roosevelt
H.E. Sunbury
Mr. Albert Simon
Mr. J.W. Guthridge

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: February 4, 5 and 6, 1970
Place: Regency Hyatt House, Atlanta, Georgia
Attendees:

Dewey E. Childers
W.H. Smith
W.C. Streib
E.A. Farrell
C.E. Stiefken
G.F.A. Brink

General Meeting of the Asbestos Textile Institute

Date: June 12, 1970
Place: Balmoral Hotel, Thetford Mines, Canada
Attendees:

J.W. Christenbury
Geo S. Fabel
C.O. Hodges
J.L. Rainey
H.S. Walter
F.T. Gatke, Jr.
D. Barois
C.G. Bourne
G.F.A. Brink
M.P. Carson
F.A. Cunningham
M.C. Pharo
P.E. LeClerc
W.V. Oughtred
R. Dodds-Hebron
C.H. Schoch
F.P. Smith
G.W. Smith
W.H. Smith
Wm. J.W. Smith
H.C. Roosevelt
J.O. Eby
W.M. Hendry
J.R.M. Hutcheson

K.V. Lindell
L. Monroe
A.C. Beguin
J.G. Berry
S. K. Brigham
J.D. Christian
C.R. Elliott
M.G. Wazurkewich
T.T. Tigert
S.G. Dixit
G.E. Houghton
G.P. Wiess
P.O. Nicodemus
O. Horcasitas
O. Horcasitas, Jr.
I. Barnett
K.A. Roberts
E.A. Schuman
C.L. Sheckler
W.C. Streib
W.C. Atkinson
E.A. Farrell
R.P. Gagnon
A. Gauthier
R.W. Godfrey
M.J. Messel
K.W. Nelson
L.C. Piuze
C.E. Stiefken
Geo. Griswold, Jr.
J. McDermott
J.K. Whittaker
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
K.W. Susler
M.Q. Scowcroft
I.H. Weaver
W.M. Deckman
B. Lincoln
D.T. Austin, Jr.
E.A. Morris
Dr. J.H. Wolfsie
P.F. Smith
H.E. Sunbury

General Meeting of the Asbestos Textile Institute

Date: October 9, 1970

Place: Hilton Inn, Williamsburg, VA

Attendees:

J.W. Christenbury
A. Kuzmuk
S.G. Dixit
G.E. Houghton
E.A. Schuman
M.J. Cowan
K.A. Roberts
I. Barnett
L.E. Moody
D.E. Childers
M.Q. Scowcroft
J.W. Hawkins
Geo. Griswold, Jr.
E.W. Russell
E.A. Morris
H.M. Willingham
P.E. LeClerc
W.H. Smith
E.A. Farrell
K. Uchida
W.M. Deckman
P.J. Smith
H.C. Roosevelt
Mrs. Doris M. Fagan
H.E. Sunbury

Meeting of the Fiber Testing Committee of the Asbestos Textile Institute

Date: October 8, 1970

Place: The Hilton Inn, Williamsburg, VA

Attendees:

S.G. Dixit
P.J. Smith
J.W. Hawkins
Walter H. Smith
J.P. Wronski
E.A. Farrell
D.E. Childers

General Meeting of the Asbestos Textile Institute

Date: June 10, 1971

Place: Cherry Hill Inn, Cherry Hill, NJ

Attendees:

G.M. Armstrong
J.W. Christenbury
C.O. Hodges
Wm. Maaskant

H.H. Walter
W.F. Brainerd
S.G. Dixit
I. Barnett
N.D. Brown
W.S. Hough
K.A. Roberts
Geo. Griswold, Jr.
Wm. Keene
J.K. Whittaker
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
M.Q. Scowcroft
E.P. Stefl
I.H. Weaver
G.F.A. Brink
P.E. LeClerc
C.H. Schoch
Walter H. Smith
R.A. Kuntze
E.A. Farrell
C.E. Stiefken
Y. Sato
D.T. Austin, Jr.
E.A. Morris
W.C. Hitchcock
P.O. Nicodemus
A.G. Scroggie
P.J. Smith
H.C. Roosevelt
H.E. Sunbury
Mrs. D.M. Fagan
Mr. C.J. Stover

Meeting of the Air Hygiene and Manufacturing Committee of the Asbestos Textile Institute

Date: June 10, 1971
Place: Cherry Hill Inn, Cherry Hill, NJ
Attendees:

H.H. Walter
L.E. Moody
D.T. Austin, Jr.
K.A. Roberts
I.H. Weaver
C.O. Hodges
G.M. Armstrong
W.F. Brainerd
Y. Sato
E.A. Farrell

General Meeting of the Asbestos Textile Institute

Date: October 8, 1971

Place: Savannah Inn & Country Club , Savannah, GA

Attendees:

G.M. Armstrong
J.W. Christenbury
G.S. Fabel
Wm. Maaskant
J.L. Rainey
H.H. Walters
S.G. Dixit
Alex Kuzmuk
N.D. Brown
M.S. Lindstrom
K.A. Roberts
C.L. Sheckler
N.W. Hendry
Geo. Griswold, Jr.
E.W. Russell
E.C. Bratt
D.E. Childers
J.W. Echerd
J.L. Mitchell
J.A. Bettles, Jr.
J.W. Hawkins
M.W. Oliver
M.Q. Scowcroft
E.P. Stefl
D.T. Austin, Jr.
B.E. Carden
L.F. Dieringer
R.C. Hunt
E.A. Morris
S.J. Peele, Jr.
F.C. Phillips
P.E. LeClerc
Marcel Dorais
Walter H. Smith
Wm. J.W. Smith
R.A. Kuntze
E.A. Farrell
C.E. Stiefken
Rafael E. Arnal
Y. Sato
H.C. Roosevelt
H.E. Sunbury

General Meeting of the Asbestos Textile Institute

Date: October 8, 1971
Place: Savannah Inn & Country Club, Savannah, GA
Attendees:

G.M. Armstrong
J.W. Christenbury
G.S. Fabel
Wm. Maaskant
J.L. Rainey
H.H. Walters
S.G. Dixit
Alex Kuzmuk
N.D. Brown
M.S. Lindstrom
K.A. Roberts
C.L. Sheckler
N.W. Hendry
Geo. Griswold, Jr.
E.W. Russell
E.C. Bratt
D.E. Childers
J.W. Echerd
J.L. Mitchell
J.A. Bettes, Jr.
J.W. Hawkins
N.W. Oliver
M.Q. Scowcroft
E.P. Stefl
D.T. Austin, Jr.
B.E. Carden
L.F. Dieringer
R.C. Hunt
E.A. Morris
S.J. Peele, Jr.
F.C. Phillips
P.E. LeClerc
Marcel Dorais
Walter H. Smith
Wm. J.W. Smith
R.A. Kuntze
E.A. Farrell
C.E. Stiefken
Rafael E. Arnal
Y. Sato
H.C. Roosevelt
H.E. Sunbury

Meeting of the Air Hygiene & Mfg. Committee of the Asbestos Textile Institute

Date: October 7, 1971
Place: Savannah Inn & Country Club, Savannah, GA

Attendees:

K.A. Roberts
C.L. Sheckler
G.M. Armstrong
J.L. Rainey
H.H. Walter
L.F. Dieringer
B.E. Carden
R.C. Hunt
J.L. Mitchell
E.C. Bratt
E.A. Farrell
Rafael E. Arnal
Y. Sato

General Meeting of the Asbestos Textile Institute

Date: February 3, 1972

Place: Mills Hyatt House, Charleston, South Carolina

Attendees:

J.W. Christenbury
Wm. Maaskant
H.H. Walter
Alex Kuzmuk
S.G. Dixit
N.D. Brown
K.A. Roberts
J.K. Whittaker
E.W. Russell
L.E. Moody
E.C. Bratt
D.E. Childers
J.W. Echerd
M.Q. Scowcroft
J.W. Hawkins
Dr. J.L. Goodman
M.W. Oliver
Mr. Puckhaber
R.T. Matthew
E.A. Morris
D.T. Austin, Jr.
B.E. Carden
R.C. Hunt
S.J. Peele, Jr.
Mr. Ellett
P.E. LeClerc
G.F.A. Brink
C.H. Schoch
Walter H. Smith
E.A. Farrell
C.E. Stiefken

H.J. Corson
B. Lincoln
Y. Sato
Wendell B. Alcorn
H.E. Sunbury

Meeting of the Air Hygiene & Mfg. Committee of the Asbestos Textile Institute

Date: February 3, 1972
Place: Mills Hyatt House, Charleston, S.C.
Attendees:

K.A. Roberts
L.E. Moody
E.C. Bratt
R.T. Matthew
J.E. Day, Jr.
Dr. J.L. Goodwin
H.H. Walter
E.A. Farrell
S.G. Dixit
R.C. Hunt
B.E. Carden
J.K. Whittaker
Y. Sato
H.J. Corson

General Meeting of the Asbestos Textile Institute

Date: June 8, 1972
Place: Key Bridge Marriott Hotel, Arlington, VA
Attendees:

Wm. Maaskant
J.L. Rainey
H.H. Walter
S.G. Dixit
Alex Kuzmuk
C.G. Guerin
M.S. Lindstrom
K.A. Roberts
J.P. Power
Geo. Griswold
E.C. Bratt
D.E. Childers
L.E. Moody
J.W. Hawkins
R.T. Matthew
M.Q. Scowcroft
I.H. Weaver
D.T. Austin, Jr.
B.E. Carden

B.D. Bittinger
L.F. Dieringer
W.C. Hitchcock
E.A. Morris
S.J. Peele, Jr.
P.E. LeClerc
Walter H. Smith
Wm. J.M. Smith
E.A. Farrell
C.E. Stiefken
Y. Sato
Wendell B. Alcorn
H.E. Sunbury
Carl A. Gnam
John H. Marsh

Meeting of the Air Hygiene & Mfg. Committee of the Asbestos Textile Institute

Date: June 8, 1972
Place: Key Bridge Marriott Hotel, Arlington, VA
Attendees:

K.A. Roberts
C.G. Guerin
J.P. Power
J.L. Rainey
H.H. Walter
S.G. Dixit
E.C. Bratt
L.E. Moody
R.T. Matthew
I.H. Weaver
E.A. Farrell
Y. Sato
B.D. Bittinger
B.E. Carden
L.F. Dieringer
P.E. LeClerc

General Meeting of the Asbestos Textile Institute

Date: September 18-20, 1972
Place: Seaview Country Club, Absecon, NJ
Attendees:

Wm. Maaskant
M.J. Scanlan
H.H. Walter
S.G. Dixit
Alex Kuzmuk
M.J. Cowan
C.G. Guerin
M.S. Lindstrom
J.P. Power

W.B. Reitze
C.L. Sheckler
J.L. Tucker
E.W. Russell
J.K. Whittaker
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
J.W. Hawkins
R.A. Jann
R.T. Matthew
M.Q. Scowcroft
J.P. Wronski
D.T. Austin, Jr.
B.E. Carden
B.D. Bittinger
L.F. Dieringer
W.C. Hitchcock
S.J. Peele, Jr.
G.F.A. Brink
P.E. LeClerc
Marcel Dorais
Walter H. Smith
Wm. J.W. Smith
Dr. R.A. Kuntze
E.A. Farrell
Rafael E. Arnal
Y. Sato
H.J. Corson, Jr.
P.O. Nicodemus
P.J. Smith
W.B. Alcorn
H.E. Sunbury
Frank T. Gatke

Meeting of the Air Hygiene & Mfg. Committees of the Asbestos Textile Institute

Date: September 19, 1972

Place: Absecon, NJ

Attendees:

Buel E. Carden
L.E. Moody
Frank T. Gatke
J.M. Corson
Y. Sato
E.W. Russell
L.F. Dieringer
B.D. Bittinger
M.J. Cowan
R.T. Matthew

S.G. Dixit
J.P. Power
H.H. Walter
E.A. Farrell
C.G. Guerin
R. Arnal
J.K. Whittaker

Meeting of the Special ATI Fiber Testing Committee

Date: September 18, 1972

Place: Seaview Country Club, Absecon, NJ

Attendees:

G.F.A. Brink
D.E. Childers
E.A. Farrell
R.A. Knutze
W.H. Smith
J.P. Wronski
D.T. Austin, Jr.
B.E. Carden
S.G. Dixit
J.W. Echerd
J.W. Hawkins
Wm. Maaskant
F.T. Gatke
Ralph Lanz
Paul O. Nicodemus
J.L. Tucker

Meeting of the Air Hygiene & Manufacturing Committee of the Asbestos Textile Institute

Date: February 9, 1973

Place: Hyatt Regency Atlanta, Atlanta, GA

Attendees:

H.H. Walter
S.G. Dixit
C.G. Guerin
A.R. Morrill
W.B. Reitze
E.A. Farrell
Y. Sato
L.E. Moody
G.F. Ducker
R.T. Matthew
I.H. Weaver
H.J. Corson, Jr.
B.E. Carden
L.F. Dieringer

R.C. Hunt

General Meeting of the Asbestos Textile Institute

Date: February 9, 1973

Place: Hyatt Regency Atlanta, Atlanta, GA

Attendees:

H.H. Walter
S.G. Dixit
A. Kuzmuk
C.G. Guerin
A.R. Morrill
E.W. Russell
D.E. Childers
J.W. Echerd
L.E. Moody
G.F. Ducker
J.W. Hawkins
R.T. Matthew
M.Q. Scowcroft
D.T. Austin
B.E. Carden
L.F. Dieringer
R.C. Hunt
E.A. Morris
S.J. Peele, Jr.
P.E. LeClerc
W.H. Smith
Dr. R.A. Kuntze
E.A. Farrell
C.E. Stiefken
Y. Sato
H.J. Corson, Jr.
W.B. Alcorn
D.M. Fagan

General Meeting of the Asbestos Textile Institute

Date: June 7, 1973

Place: Key Bridge Marriott, Arlington, VA

Attendees:

W. Maaskant
M.J. Scanlan
H.H. Walter
S.G. Dixit
A. Kuzmuk
C.G. Guerin
T.P. Jackson
J.P. Power

W.B. Reitze
W.C. Streib
E.W. Russell
J.K. Whittaker
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
M.M. Brooks
J.W. Frampton, Jr.
J.W. Hawkins
R.T. Matthew
M.Q. Scowcroft
I.H. Weaver
W.D. Bittinger
B.E. Carden
L.F. Dieringer
E.A. Morris
P.E. LeClerc
W.H. Smith
E.A. Farrell
R. Lefebvre
C.E. Stiefken
R. Arnal Olivo
E.J. Leff
P.O. Nicodemus
D.M. Fagan

Meeting of the Air Hygiene & Manufacturing Committee of the Asbestos Textile Institute

Date: June 7, 1973
Place: Key Bridge Marriott, Arlington, VA
Attendees:

H.H. Walter
M. Cattaneo (Adorno)
E.J. Leff
J.P. Power
S.G. Dixit
C.G. Guerin
W.B. Reitze
E.A. Farrell
R.L. Lefebvre
E.C. Bratt
L.E. Moody
R.T. Matthew
I.H. Weaver
W.D. Bittinger
B.E. Carden
L.F. Dieringer

Meeting of the Air Hygiene & Manufacturing Committee of the Asbestos Textile Institute

Date: October 4, 1973

Place: Wychmere Harbor Club, Harwichport, MA

Attendees:

H.H. Walter
A. Morrill
J.P. Power
S.G. Dixit
C.G. Guerin
E.A. Farrell
Y. Sato
E.C. Bratt
L.E. Moody
R.T. Matthew
I.H. Weaver
H.J. Corson
B.E. Carden
L.F. Dieringer

Annual Meeting of the Asbestos Textile Institute

Date: October 5, 1973

Place: Wychmere Harbor Club, Harwichport, MA

Attendees:

W. Maaskant
J.L. Rainey
M.J. Scanlan
H.H. Walter
S.G. Dixit
A. Kuzmuk
C.G. Guerin
A. Morrill
J.P. Power
E.W. Russell
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
M.N. Brooks
S.G. Ledbetter
R.T. Matthew
W.A. Mitchell
M.W. Oliver
M.Q. Scowcroft
I.H. Weaver
D.T. Austin
B.E. Carden
L.F. Dieringer
W.C. Hitchcock

E.A. Morris
S.J. Peele
H.E. Sunbury
G.F.A. Brink
P.E. LeClerc
M. Dorais
W. J.W. Smith
W.H. Smith
R.A. Kuntze
E.A. Farrell
C.E. Stiefken
Y. Sato
H.J. Corson
P.O. Nicodemus
E.J. Leff
D.M. Fagan
Alison D. McDonald, M.D.
John H. Marsh
Robert A. Clifton

General Meeting of the Asbestos Textile Institute

Date: February 8, 1974
Place: Mills Hyatt House, Charleston, South Carolina
Attendees:

W. Maaskant
J.L. Rainey
H.H. Walter
S.G. Dixit
A. Kuzmuk
J.P. Power
W.B. Reitze
A.M. Weisberg
J.K. Whittaker
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
J.A. Bettles, Jr.
P.G. Dolan
J.W. Hawkins
R.T. Matthew
M.W. Oliver
F.J. Puckhaber
M.Q. Scowcroft
W.S. Simpson
D.T. Austin
C.S. Barnwell
B.D. Bittinger
B.E. Carden
L.F. Dieringer

E.A. Morris
P.E. LeClerc
W.H. Smith
R.A. Kuntze
E.A. Farrell
C.E. Stiefken
K. Mori
Y. Sato
H.J. Corson, Jr.
Robert H. Mereness
Cois M. Brown
Doris M. Fagan
E.J. Leff

Meeting of the Air Hygiene & Manufacturing Committee of the Asbestos Textile Institute

Date: February 8, 1974
Place: Mills Hyatt House, Charleston, South Carolina
Attendees:

H.H. Walter
J.P. Power
S.G. Dixit
W.B. Reitze
E.A. Farrell
A.M. Weisberg
K. Mori
Y. Sato
L.E. Moody
C.A. Kennedy
R.T. Matthew
H.J. Corson
B.D. Bittinger
B.E. Carden
L.F. Dieringer

General Meeting of the Asbestos Textile Institute

Date: June 7, 1974
Place: Twin Bridges Marriott, Arlington, VA
Attendees:

J.L. Rainey
M.J. Scanlan
P.S. Hanke
A. Kuzmuk
G.G. Gabrielson, Jr.
W.A. Guenther
M.Q. Scowcroft

E.C. Bratt
L.D. Lenihan
E.A. Morris
P.E. LeClerc
N.W. Hendry
R.B. Von Wald
D.B. MacDermott
E.A. Farrell
C.E. Stiefken
K. Mori
Y. Sato
H.J. Corson
W.B. Alcorn, Jr.
D.M. Fagan

Annual Meeting of the Asbestos Textile Institute

Date: September 27, 1974
Place: Cloister, Sea Island, GA
Attendees:

W. Maaskant
M.J. Scanlan
H.H. Walter
A. Kuzmuk
G.G. Gabrielson, Jr.
M.N. Brooks
P.G. Dolan
J.W. Hawkins
R.T. Matthew
R.O. Moebius
M.Q. Scowcroft
W.S. Simpson
E.C. Bratt
D.E. Childers
J.W. Echerd
L.E. Moody
C.S. Barnwell
B.E. Carden
E.A. Morris
G.F.A. Brink
P.E. LeClerc
W.H. Johnston
W.H. Smith
A.C.F. Finkbiner, III
J.P. Power
R.A. Kuntze
E.A. Farrell
R. Lefebvre
R.J. Muth
C.E. Stiefken
H.J. Corson, Jr.

W.B. Alcorn, Jr.
D.M. Fagan

Meeting of the Air Hygiene & Manufacturing Committee of the Asbestos Textile Institute

Date: September 26, 1974

Place: Cloister, Sea Island, GA

Attendees:

H.H. Walter
W.H. Johnston
A.C.F. Finkbiner, III
J.P. Power
A. Kuzmuk
E.A. Farrell
R. Lefebvre
R.J. Muth
M.N. Brooks
P.G. Dolan
R.T. Matthew
R.O. Moebius
E.C. Bratt
L.E. Moody
H.J. Corson
B.E. Carden

41. As to each product listed in response to Interrogatory No. 5, please state whether Defendant, at any time, published and/or distributed any printed materials, including but not limited to brochures, pamphlets, catalogs, packagings or other written materials of any kind or character that contain any warnings, cautions, caveats or directions concerning the possible health effects of the products on a person. If so, please state as to each product:

- (a) The name of each relevant product;
- (b) The wording of each such warning;
- (c) A description of each such printed material;
- (d) The method used to distribute the warning to persons who are likely to use the products;
- (e) The date each such warning was issued;

- (f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
- (g) Please attach a copy of the warning and date said warning was issued;
- (h) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it sold chrysotile asbestos fiber only to sophisticated manufacturing concerns that were as knowledgeable, if not more so, than LAQ as to potential health hazards and the proper handling of asbestos fiber. Beginning in 1972, LAQ provided information on the proper handling of its asbestos on Material Safety Data Sheets which were required by OSHA. The data sheets also included information relating to the disposal of asbestos, the proper clean up of asbestos and other related issues. The following are excerpts from LAQ data sheets regarding the use of fiber:

"8 hour time weighted average 5 fibers/ml greater than 5 microns in length - concentrations above 5 fibers/ml not to exceed 10 fibers/ml at any time." "5 fibres per cc over 5 microns long on a 8Hr. time weighted average." "Potential Carcinogen. Governmental regulations has set 2.0 fibres per cc over 5 microns long on an 8 hour time weighted average." "Sufficient to keep dust count below 2.0 fibres per cc over 5 microns on an 8 hour time weighted average." "2.0 fibres per cc over 5 microns long on a 8Hr. time weighted average." "2 fibres longer than 5 microns per cubic centimeter." "Control with mechanical dust collection equip. to within TLV."

"Place waste in closed containers. Dispose of waste in closed containers. Avoid breathing excessive dust." "Discard waste fibre in sealed, properly labeled bags; dispose of in accordance with applicable EPA regulations." "Care should be taken to avoid asbestos dust to become airborne. Remove spillage and clean storage area by aspiration. Do not smoke. Always operate and maintain ventilation and other equipment. Wear approved respirators as instructed. Vacuum loose fibre or wet before clean up. Discard waste fibre in sealed bags. Use vacuum equipment to remove dust from clothes. Repair damaged bags

immediately." "Spillage should be cleaned up by aspiration, avoid sweeping or other methods causing asbestos to become airborne." "Use plastic bag for transportation. Dispose of waste in earth filled dump." "Maintain good housekeeping practices. Vacuum clean waste and place in closed containers. See caution label on bag." "Wet properly and place in a dustproof container or use a vacuum for aspiration. Bury under earth." "Avoid creating dust - use vacuum to remove spills."

"A clean-up procedure (i.e. vacuuming or wetting) which minimizes exposure is required. Place all material in closed containers with approved labels. If the possibility of dust exposure exists, wear NIOSH/MSHA approved respiratory protection." "Dispose of material in accordance with all Federal, state and local air pollution, water pollution and solid waste regulations. Recommend disposal in an EPA approved hazardous waste landfill." "Local exhaust ventilation, material wetting and/or respiratory protection is required for all sawing, grinding, cutting, bulk handling, spraying, demolition, removal or other activities where dust exposure may occur." "Avoid inhalation or ingestion of dust. Do not smoke. Practice good housekeeping and personal hygiene procedures. Avoid asbestos dust becoming airborne and remove spillage by vacuuming loose fiber or wetting before clean-up. Do not dry sweep. Repair damaged bags immediately. Place all material in closed containers properly labeled."

"Non Flammable." "Vacuum clean spillage - repair broken bags - if sweeping is necessary, wet down spillage - use approved respiratory equipment when required." "Wear approved respirators as instructed. Vacuum loose fibre or wet before clean up. Do not sweep or cause asbestos to become airborne. Repair damaged bags immediately." "Use respirators approved by NIOSH." "Wear NIOSH/MSHA approved self-contained breathing apparatus and protective clothing." "Use approved respirator when working in dusty condition." Use "NIOSH/MSHA [respiratory protection] approved for toxic dusts or asbestos." "Protective clothing is required if exposures exceed the OSHA ceiling limit or significant contact occurs. Remove all work clothing before leaving plant premises."

"Prolonged continuous exposure to asbestos dust may cause impairment to the respiratory system." "Long term exposure to high concentrations of asbestos fiber may cause pulmonary disease." "Asbestosis, lung cancer and other fatal diseases may be caused by inhalation of asbestos. Smoking greatly increases lung cancer risk." "Danger - Contains asbestos fibres - Avoid creating dust - Asbestosis, lung cancer and other fatal diseases may be caused by inhalation of asbestos. Smoking greatly increases lung cancer risk." "Care should be taken to avoid asbestos dust becoming airborne, remove spillage and clean storage area by aspiration." "Avoid breathing excessive dust when handling, dumping and mixing. See caution label on bag." "Inhalation of excessive asbestos dust can have detrimental effects on health." "Lung cancer." "Chronic inhalation of asbestos may cause symptoms of variable cough, dyspnea, chest pains, weakness and decreased chest expansion. Later findings may include asbestosis - a diffuse but non-uniform fibrosis of the lungs; and respiratory cancer."

The following are additional warnings and precautions derived from undated safety data sheets:

"Protective clothing is required if exposure exceeds the OSHA ceiling limit or significant contact occurs, remove all clothing before leaving the plant." "Chronic inhalation of asbestos may cause symptoms of variable cough, dyspnea, chest pains, and decreased chest expansions; later findings may include asbestosis, a diffuse but non-uniform fibrosis of the lungs, and respiratory cancer." "Local exhaust ventilation, material wetting, and or respiratory protection is required for all sawing, grinding, cutting, bulk handling, spraying, demolition, removal or other activities where dust exposure may occur." "Spillage should be cleaned up by aspiration, avoid sweeping or other methods causing asbestos to become airborne." "Avoid inhalation or ingestion of dust." "Practice good housekeeping and personal hygiene." "Always operate and maintain ventilation and other equipment."

LAQ placed warnings concerning the potential health hazards of asbestos on its bags of raw asbestos fiber from March of 1970 until it ceased asbestos mining operations in June of 1986. Moreover, beginning in 1972, LAQ provided information on the proper handling of its asbestos on Material Safety Data Sheets which were required by OSHA. The data sheets also included information relating to the disposal of asbestos, the proper clean up of asbestos, and other related issues. In 1978, LAQ also began distributing to its customers pamphlets regarding the potential health hazards of asbestos.

The warning labels initiated in March 1970 stated:

CAUTION

**THIS BAG CONTAINS CHRYSOTILE ASBESTOS FIBER
PERSONS EXPOSED TO THIS MATERIAL SHOULD
USE ADEQUATE PROTECTIVE DEVICES AS INHALATION
OF THIS MATERIAL OVER LONG PERIODS
MAY BE HARMFUL**

As these bags are no longer in existence, LAQ is unable to provide information regarding the location, size, color, etc. of the warning.

The warning was revised as of September 1972 to conform to OSHA requirements and stated:

CAUTION

**CONTAINS ASBESTOS FIBER
AVOID CREATING DUST
BREATHING ASBESTOS MAY CAUSE
SERIOUS BODILY HARM**

This warning was located in two places on LAQ's bags of asbestos fiber. The warning was printed in the middle of the front of the bag, in blue letters contained in a rectangular 5 x 2 ¼ inch box beneath the words "ASBESTOS" and "AMIANTE." The same warning in the same format was located on the bottom of the bag, next to the grade of asbestos, so as to be visible when the bags were stacked.

The warning was further revised as of June 1, 1977, to state:

**DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
ASBESTOSIS, LUNG CANCER AND OTHER FATAL
DISEASES MAY BE CAUSED BY INHALATION OF
ASBESTOS
SMOKING GREATLY INCREASE LUNG CANCER RISK**

This warning was located in 4 different places on LAQ's bags of asbestos fiber. The warning was printed in red letters, in the middle of the bag beneath the words "ASBESTOS" and "AMIANTE." The warning was also printed on a 6 x 3 inch rectangular box on the bottom of the bag, next to the grade of asbestos, so as to be visible when the bags were stacked.

Also, beginning June 1, 1977, the following handling instructions were placed on LAQ's bags of raw asbestos fiber:

**HANDLING INSTRUCTIONS:
DO NOT SMOKE. ALWAYS OPERATE AND MAINTAIN
VENTILATION AND OTHER CONTROL EQUIPMENT.
WEAR APPROVED RESPIRATORS AS INSTRUCTED.
VACUUM LOOSE FIBRE OR WET BEFORE CLEAN UP.
DISCARD WASTE FIBRE IN SEALED BAGS.
USE VACUUM EQUIPMENT TO REMOVE DUST FROM CLOTHES.
REPAIR DAMAGED BAGS IMMEDIATELY.**

These instructions were located on both sides of LAQ's bags of asbestos fiber, printed vertically in a 1 ft. x 2 ½ in. rectangular box next to the warning labels.

The following LAQ employees took part in the decisions on the placement and wording of the warnings on bags of LAQ asbestos fiber: Michael J. Messel, former President; Roland P. Gagnon, former Senior Vice-President; Gaston Verreault, former Vice-President Operations; Lionel C. Piuze, former Vice-President Operations; and, Edward Farrell, former Sales Manager.

Additionally, beginning in 1977, LAQ placed warnings, handling instructions and Terms and Conditions concerning the potential health hazards of asbestos, asbestos-related industrial hygiene standards and asbestos related employee education on commercial invoices and bills of lading. The language of each of the aforementioned warnings, instructions, terms and conditions and statements furnished by LAQ to its customers is as follows:

Statements on Front of Commercial Invoices:

From 1977 to 1979, the following statement appeared on the front bottom section of each of LAQ's commercial invoices:

Purchaser agrees to follow and to provide in accordance with the Terms and Conditions of this agreement the health warning advice and the instructions for using and handling asbestos fiber contained on the reverse side of this document.

From 1979 to 1982, the following statement appeared on the front bottom section of each of LAQ's commercial invoices:

BUYER AGREES TO FOLLOW AND TO PROVIDE IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THIS AGREEMENT THE HEALTH WARNING ADVICE AND THE INSTRUCTIONS FOR THE USING AND HANDLING OF ASBESTOS FIBRE REFERRED TO IN PARAGRAPH 1 OF SAID TERMS AND CONDITIONS.

Invoice Terms and Conditions:

From 1977 to 1979, the terms and conditions of LAQ's sale of chrysotile asbestos, as set forth on the invoice, included the following:

TERMS AND CONDITIONS

DANGER: Asbestos Fibre are a cancer hazard. Exposure to asbestos can cause fatal illness from respiratory (lung) cancer and other cancers, and from asbestosis. Workers who smoke, during working hours or at other times, risk a significantly increased chance of contracting lung cancer from asbestos exposure. Purchaser agrees to warn its employees, agents, representatives, and customers of this danger and to instruct the aforesaid individuals in the proper use and handling of asbestos fibers, including, as a minimum, the distribution of the Seller's booklet which describes safety precautions to be observed and stresses the significantly increased health dangers from asbestos exposure to individuals who smoke. Purchaser further agrees that the workplace in which Seller's asbestos fibers are handled or otherwise used by Purchaser and its employees or agents shall fully comply with applicable OSHA requirements. Purchaser and Seller

agree to indemnify each other and to hold each other harmless against and from any and all losses, damages, costs (including legal fees) and penalties of any nature whatsoever related to the other party's failure to comply with the Occupational Safety and Health Act of 1970 or such Act as amended.

Purchaser agrees to use its most diligent efforts to assure that its customers warn their employees, agents, representatives, and customers of the above-described dangers, safety precautions and instructions for use which requirement shall continue for each subsequent customer in the chain of distribution.

From 1979 to 1982, the terms and conditions of LAQ's sale of chrysotile asbestos, as set forth on the invoice, included the following:

TERMS AND CONDITIONS

DANGER: Inhalation of excessive concentrations of asbestos fiber can cause , a permanent and potentially fatal lung disorder, and may cause fatal illness from respiratory (lung) cancer and other cancers. One of these, mesothelioma, has been observed in asbestos workers exposed to low concentrations of asbestos fiber. Asbestos workers who smoke, during working hours or at other times, risk a significantly increased chance of contracting lung cancer.

Buyer agrees to warn its employees, agents, representatives and customers of these dangers and to instruct the aforesaid individuals in the proper use and handling of asbestos fiber, including, as a minimum the distribution of the Seller's booklet which describes safety precautions to be observed and stresses the significantly increased health dangers to asbestos workers who smoke.

Buyer further agrees that the workplace in which Seller's asbestos fiber is handled or otherwise used by Buyer and its employees or agents shall fully comply with applicable OSHA and other governmental requirements.

Buyer agrees to use its most diligent efforts to assure that its customers warn their employees, agents, representatives, and customers of the above described dangers, safety precautions and instructions for use which requirement shall continue for each subsequent customer in the chain of distribution.

Statements of Bills of Lading:

Beginning in 1977, each bill of lading provided by LAQ contained a warning regarding the potential health hazards of asbestos.

WARNING

DANGER: Asbestos Fibre are a cancer hazard. Exposure to asbestos can cause fatal illness from respiratory (lung) cancer and other cancers, and from asbestosis. Workers who smoke, during working hours or at other times, risk a significantly increased chance of contracting lung cancer from asbestos exposure.

Pamphlets distributed to customers

The following cautionary statement was included in the pamphlets regarding the potential health hazards of asbestos which LAQ distributed to its customers in 1978:

Health Hazards

Exposure to asbestos dust in the workplace over a period of years can increase the risk of developing certain diseases. The experts are not all in agreement on the level below which there is no risk. Available medical evidence indicates that your chances of contracting asbestos-related disease are minimized as asbestos concentrations in the workplace are reduced to approved levels. Several studies accept and recommend 5 fibers per cubic centimeter while others prefer 2 fibers per cc and reduction to 0.5 fibers has been proposed. Current OSHA regulations are 2 fibers per cc.

In order to provide you with notice and warning of asbestos health hazards, Lake Asbestos places a label on each bag of asbestos fiber which it sells. The label reads as follows:

**DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
ASBESTOSIS, LUNG CANCER AND OTHER FATAL
DISEASES MAY BE CAUSED BY INHALATION OF
ASBESTOS
SMOKING GREATLY INCREASES LUNG CANCER RISK**

There are four diseases associated with asbestos dust exposure. First is asbestosis which damages the lungs

and may permanently impair breathing. In certain severe cases, it may be fatal. This disease appears in those who have been exposed to excessive concentrations of asbestos dust over a period of years.

Lung and gastrointestinal cancer (stomach, colon and rectum) have been shown to be associated with many years of exposure to excess concentrations of asbestos dust and can be fatal. However, studies carried out on workers in the asbestos industry in England and Canada have shown that as total exposure to airborne asbestos fiber was reduced, there was a corresponding reduction in the excess mortality observed.

The fourth disease is mesothelioma, a rare and incurable form of cancer of the lining of the chest or abdominal cavity. It may occur from elevated concentrations of asbestos and has been observed in individuals exposed to low and to no known concentration of asbestos fiber.

Smoking

Here is where you can greatly reduce your chances of developing lung cancer. It has been established that cigarette smoking GREATLY increases the risk of developing lung cancer in asbestos workers. Further, the lung cancer risk for the asbestos worker in a well controlled environment who has never smoked appears to be no greater than the average person who does not smoke.

It is essential that asbestos workers who smoke, during work hours or at other times, take immediate action to STOP SMOKING. Asbestos workers who do not smoke should not start.

Also, if you or your family has a history of lung problems, you may be susceptible to asbestos health hazards. As a result, the regular lung examinations provided by your company are especially important. Be sure to take advantage of this service.

42. Has sales material been prepared by Defendant or its agents for purposes of marketing or advertising the asbestos products listed in answer to Interrogatory No. 5? If so, please state:

- (a) The name and address of each person or entity who prepared same;
- (b) The name, address and job title of each person who presently has possession of same;
- (c) The date same was prepared;
- (d) The media used to disseminate the sales material.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, with respect to its raw chrysotile asbestos fiber, LAQ did at various times engage in advertising, most of it within the industry trade publication Asbestos. LAQ also used over the years various corporate or product brochures, pamphlets and catalogs relating to the sale and promotion of its asbestos.

43. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 5 should be used or maintained by the ultimate user or those working in facilities or at job sites where the product was used, installed or removed, including, but not limited to, those sites listed on the job site list attached as Exhibit A?

If so, please state the following:

- (a) The name, address and job classification of each person who prepared same;
- (b) The name, address and job classification of each person who presently has possession of same;
- (c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its responses to Interrogatory No. 41.

44. Was any written material of any kind prepared by Defendant and distributed to those individuals listed in response to Interrogatory No. 9? If so, please state the following:

- (a) Identify the written material by content and date;
- (b) To whom was it delivered.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ refers to its response to Interrogatory No. 9.

45. Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or applying same? If so, please state the following:

- (a) The date that Defendant first determined that another product could be used in place of asbestos;
- (b) The chemical of the substitute;
- (c) Whether the substitute is suitable for the purpose for which they are to be used;
- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court. LAQ also objects to the subparts, as they are unintelligible in the context of this Interrogatory.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture or sell asbestos-containing products; it only mined, milled and sold raw chrysotile asbestos fiber. LAQ states that products containing chrysotile asbestos fiber can be manufactured to eliminate all potential health hazards to persons working with or around the products. As a basis for this contention, LAQ relies on a number of studies and other references; including, but not limited to the epidemiological studies by Weill, et al. (J. Occup. Med. 15:248-252, 1973; Arch. Environ. Health 30:88-97, 1975; Am. Rev. Respir. Dis. 120:345-354, 1970), Thomas, et al. (Brit. J. Med. 39:273-276, 1982), Liddell, D. (Thorax 36:241-244, 1981), Churg, A. (Am. Rev. Respir. Dis. 134:125-127, 1986), Ohlson, C. (Brit. J. Indus. Med. 42(6):397-402), McDonald, A., et al. (Brit. J. Indus. Med. 41:151-157, 1984) and Berry & Newhouse (Brit. J. Indus. Med. 40:1-7, 1983), as well as the animal study by Begin, et al. (Chest 86:301, 1984). LAQ further notes that from the onset of its commercial operations in 1958, there were well understood and widely available methods of industrial hygiene which could ensure that the use of LAQ's chrysotile asbestos would not pose a hazard to human health.

46. Did Defendant give any warnings to any individuals at the sites listed on Exhibit A, including any individuals who owned, operated, or managed the facilities at the sites listed on Exhibit A, regarding the potential health hazards of any product listed in response to Interrogatory No. 5. If yes, please state:

- (a) Name of person most knowledgeable about this communication.
- (b) Name of person at the sites listed on Exhibit A, attached hereto most knowledgeable about this communication.
- (c) Dates of each communication.
- (d) Contents of each communication.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it never sold or distributed its raw chrysotile asbestos fiber to any of the sites listed by plaintiffs on Exhibit A.

47. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
- (b) The disease alleged in each such claim;
- (c) A brief summary of the disposition of each such claim; and
- (d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that prior to 1970, no person had filed a claim against any Workers' Compensation Carrier covering LAQ alleging that he or she contracted a disease as a result of exposure to asbestos.

47.1 Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states it never manufactured or sold asbestos containing products, but only mined, milled and sold raw chrysotile asbestos fiber.

47.2 Has any person or company from which you purchased asbestos-containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it is unaware of any such recall.

47.3 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it never manufactured or sold asbestos containing products, but only mined, milled and sold raw chrysotile asbestos fiber. Since LAQ began to sell chrysotile asbestos fiber in commercial quantities in July 1958, it sold its asbestos only to sophisticated manufacturing concerns and relied on the fact that the entities to which LAQ sold its fiber were equally, if not more, knowledgeable than was LAQ in the areas of industrial hygiene and would take the

appropriate housekeeping and industrial hygiene measures to safeguard their own employees. Accordingly, LAQ was under no duty to make recommendations to its customers who were sophisticated consumers of LAQ's chrysotile asbestos fiber.

As for LAQ's own facilities, LAQ was fulfilling its responsibility to safeguard and protect its workers. In July of 1958, at the start of commercial operations at its mine and mill in Black Lake, Quebec, LAQ utilized the most modern technology available. Over the years, LAQ had taken numerous steps to control dust emissions. From July 1958, LAQ's operation contained a central vacuum system and negative air. (Subsequent improvements were made thereon at various times including 1961 and 1977.) From July 1958, respirators were made available to LAQ employees; automatic bagging machines were installed; dust counts were taken; water was injected on tailings and/or waste disposal; roads within the pit area were wet down with water; and conveyors were covered. Bag filters were present on various emission stacks at the LAQ mill beginning in 1958 and various additions and improvements thereon were made over the years. Dust control equipment was installed on all drills in the mine section and machinery at transfer points in the mill section beginning in 1958.

Additionally, LAQ understood that respirators could be effective to reduce dust exposure during situations of short duration, high intensity exposure. LAQ states that respirators have always been available to all LAQ employees since its mine and mill in Black Lake, Quebec began commercial production of chrysotile asbestos fiber in July of 1958. LAQ has required the use of respirators by employees who would be engaged in a "dusty" task, which would be a job which could expose the employee to concentrations of asbestos dust in excess of what was considered safe concentrations. Since its inception, LAQ has employed a number of different types of breathing devices designed to reduce the inhalation of asbestos dust and fibers. They were the MFA Dustfoe, the R2000 American Optical Respirator, the BM2121 American Optical Respirator, the 3M 8500 and the 3M 8710.

From the outset, LAQ employees were and continued to be trained and education in dust control and good housekeeping practices. This training had been part of the basic orientation given to all LAQ mine and mill employees over the years.

47.4 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;
- (b) state when such action was taken;
- (c) state what written material exists related to such action;
- (d) state the names, job titles and last known address of the individuals who undertook such actions.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it never manufactured or sold asbestos containing products, but only mined, milled and sold raw chrysotile asbestos fiber. LAQ refers to its response to Interrogatory No. 47.3.

48. Did Defendant receive notice prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;
- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney representing the individuals making such claims;
- (f) The style and court number of each such claim;
- (g) The resolution of each claim.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that, prior to 1968, LAQ had not received notice that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using LAQ raw chrysotile asbestos fiber.

48.1 Describe the method by which you have maintained records concerning the manufacture, sale, supply, distribution, use, advertising, delivery and/or installation or tear-out of each of asbestos-containing products. For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g., boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacture, sale, supply, distribution, use, advertising, delivery, and/or installation or tearout which such record keeping system covers;
- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that it neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that as it never sold its raw asbestos fiber to the job sites listed on Exhibit A, thus there are no documents responsive to this Interrogatory with respect to such job sites. LAQ's sales invoices and freight vouchers (which also contain information relating to asbestos sales) are not maintained according to purchaser. The invoices are only maintained in chronological order. The freight vouchers are contained within a larger set of vouchers. Accordingly,

the documents are not and were not organized by customer in the ordinary course of LAQ's business. Any documents relevant to this Interrogatory are in the custody of LAQ's national counsel, Porzio, Bromberg & Newman, P.C.

48.2 State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has no knowledge of any pertinent record retention rules and/or guidelines in effect prior to 1975. However, at least since 1975, the first year in which LAQ was sued in an asbestos personal injury litigation, it has been LAQ's policy not to destroy any records which may be relevant to its potential liability in pending or reasonably anticipated litigation.

48.3 For all documents, other than invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?

- (e) What manner of electronic format is used?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further, LAQ objects to this Interrogatory on the grounds that it may seek attorney work product. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has not compiled an index for documents relevant to these interrogatories.

48.4 For all invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further, LAQ objects to this Interrogatory on the grounds that it may seek attorney work product. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it has not compiled an index for documents relevant to these interrogatories.

49. Has Defendant obtained statements from any witnesses including Plaintiffs? If so, please:

- (a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that it has received a copy of plaintiff's answers to interrogatories and deposition in this action.

50. Do you contend that Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set forth in detail in what respect the product was improperly used.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not manufacture or sell asbestos containing products, but only mined, milled and sold raw chrysotile asbestos fiber. Moreover, LAQ cannot respond to this Interrogatory since LAQ did not sell its raw asbestos fiber to any of the job sites listed on Exhibit A, and has no knowledge that plaintiff/decendent ever worked with LAQ raw asbestos.

51. As to the sites listed on Exhibit A, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other-than asbestos which contributed to or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- (a) The facts upon which you rely;
- (b) The identity of the sources upon which you rely which substantiate these facts.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it did not sell its raw asbestos fiber to any of the job sites listed on Exhibit A and it has no knowledge of what other substances may or may not have been present at those sites. Further, LAQ has no current understanding as to the nature and extent of plaintiffs' injuries, if any.

52. Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so, state:

- (a) When the respirator was sold;
- (b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- (c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers;
- (d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;
- (e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

ANSWER:

LAQ objects to this Interrogatory on the grounds that is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it understood that respirators could be effective to reduce dust exposure during situations of short duration, high intensity exposure. LAQ states that respirators have always been available to all LAQ employees since its mine and mill in Black Lake, Quebec began commercial production of chrysotile asbestos fiber in July of 1958. LAQ has required the use of respirators by employees who would be engaged in a "dusty" task, which would be a job which could expose the employee to concentrations of asbestos dust in excess of what was considered safe concentrations. Since its inception, LAQ has employed a number of different types of breathing devices designed to reduce the inhalation of asbestos dust and fibers. They were the MFA Dustfoe, the R2000 American Optical Respirator, the BM2121 American Optical Respirator, the 3M 8500 and the 3M 8710.

53. Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

- (a) Their identity and last known address;
- (b) The subject matter on which the expert is expected to testify;
- (c) The expert's specific conclusion and specific opinions and the specific basis therefore;
- (d) The expert's qualifications to render the opinions set forth above;
- (e) Whether any person identified in sub-paragraph (a) above has provided a report or other documentation to you, and if so, identify such document or report;
- (f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and
- (g) Describe in detail the education and work history of, and identify any books, treaties, article, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is premature and unduly burdensome insofar as it exceeds the requirements of the Ohio Rules of Court. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ has not yet determined whom it intends to call as an expert witness at the time of trial. LAQ will provide this information in accordance with the Ohio Rules of Court and any applicable standing order or case management order governing this action.

54. Please state the name and last known address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is premature and unduly burdensome insofar as it exceeds the requirements of the Ohio Rules of Court. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ refers to its response to Interrogatory No. 53.

55. Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

ANSWER:

Defendant objects to this Interrogatory to the extent that it calls for a legal conclusion. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ admits that it was properly served with plaintiff's complaint.

55.1 For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, or the cross-claims or counter-claims of any party against Defendant, state:

- (a) the facts upon which Defendant relies for each and every affirmative defense;
- (b) each and every document which will be offered to prove each and every affirmative defense; and
- (c) each and every witness who will testify in support of each and every affirmative defense.
- (d) the substance and subject matter of the anticipated testimony of each witness identified in the preceding response.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objection, LAQ states that, pursuant to the Cuyahoga County standing order for asbestos litigation, it was not required to file an answer or affirmative defenses.

56. Does Defendant have policies of insurance that might cover the claims that have been made by Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that it cannot predict with certainty the insurance policy or policies which could apply to the injuries alleged in this lawsuit. However, if liability were ever found against LAQ, coverage could come from one or more insurance companies whose policies are available for inspection at the offices of its national counsel Porzio, Bromberg & Newman, P.C. upon reasonable notice.

56.1 Has Defendant ever been involved in any litigation concerning potential insurance coverage for asbestos products liability matters? If so, please state:

- (a) the case caption, court and date of filing of each case in which you have been involved;
- (b) whether you were Plaintiff or Defendant;
- (c) a brief statement of the issues;
- (d) identify by date, author and recipients), (including recipients of carbon copies) all documents listed as exhibits by either party in this litigation;

- (e) identify by deponent and date all individuals who were deposed in these cases;
- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;
- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

ANSWER:

Defendant objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court. Additionally, LAQ objects to this Interrogatory on the grounds that it seeks information that is subject to the attorney-client privilege, the attorney work-product doctrine and possible violative of confidentially provisions or protective orders in the insurance coverage litigation.

57. Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. LAQ further objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

Subject to and without waiving the foregoing objections, LAQ states that, other than the plaintiff, plaintiff's spouse, plaintiff's co-workers and plaintiff's medical providers, it has not yet determined the identities of persons having knowledge of relevant facts regarding this lawsuit. LAQ will provide this information in accordance with the Ohio Rules of Court and any standing order or case management order applicable to this case.

58. State the last date that Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

ANSWER:

LAQ objects to this Interrogatory on the grounds that it exceeds the permissible number of Interrogatories permitted by the Ohio Rules of Court.

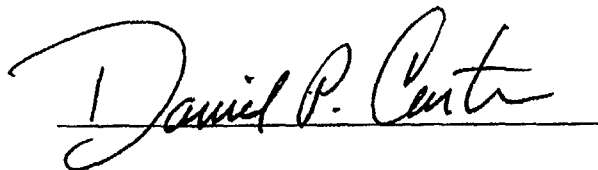
Subject to and without waiving the foregoing objection, LAQ states that it ceased mining, milling and selling raw asbestos fiber on or about June 30, 1986.

EXHIBIT A

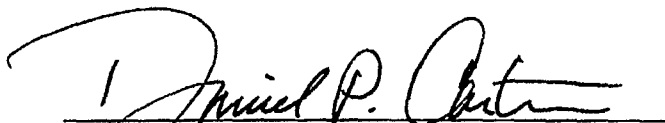
BARON & BUDD SITE LIST

Tennessee Eastman Corp., Kingsport, TN
Specialty Paper Co., Dayton, OH
General Motors, Moraine, OH
Interstate Folding Box, Middletown, OH

As to all Objections:



Respectfully submitted,



DANIEL P. CARTER (0074848)

JEFFREY W. RUPLE (0068742)

1400 Bank One Center

600 Superior Avenue East

Cleveland, Ohio 44114

(216) 363-1400

(216) 579-1020 *Facsimile*

OF COUNSEL:

BUCKLEY KING

and

Kenneth R. Meyer, Esq.

Christopher P. DePhillips, Esq.

PORZIO, BROMBERG & NEWMAN, P.C.

100 Southgate Parkway

Morristown, New Jersey 07962-1997

(973) 538-4006

(973) 538-5146 *Facsimile*

Counsel for Defendant

Lac D-Amiante Du Quebec, Ltee

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant Lac D-Amiante Du Quebec, Ltee's Responses to Plaintiff's Master Set of Interrogatories, has been sent by ordinary U.S. mail, postage prepaid upon LADD R. GIBKE, ESQ., Baron & Budd, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219 and THERESA L. NELSON, ESQ., Baron & Budd, P.C., 30 Overbrook Blvd., Suite F, Monroe, Ohio 45050, this 21st day of November, 2002.


DANIEL P. CARTER

J:\CL\5477\328\033BR001not.app.wp

BUCKLEY KING

1400 BANK ONE CENTER • CLEVELAND, OHIO 44114-2652
(216) 363-1400 • (800) 255-2825 • (216) 579-1020 FACSIMILE
bk@bucklaw.com

Writer's Direct E-Mail: carter@bucklaw.com

November 21, 2002

Ladd R. Gibke, Esq.
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

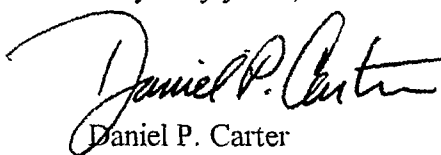
Theresa L. Nelson, Esq.
Baron & Budd, P.C.
30 Overbrook Blvd., Suite F
Monroe, Ohio 45050

Re: Barbara Rhoton v. A-Best Products Company, et al.
Cuyahoga County Court of Common Pleas
Case No. 434065

Dear Mr. Gibke and Ms. Nelson:

Enclosed is a copy of Lac D'Amiante Du Quebec, LTEE's Responses to Plaintiff's Master Set of Interrogatories. The Verification page and the Responses to Plaintiff's Request for Production of Documents will be served upon you on or before Monday November 25, 2002. We apologize for any inconvenience this may have caused you. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Daniel P. Carter

DPC\vbs
Enclosure

cc: Kenneth Meyer, Esq. (w/encl.)

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