

CARL J. VALORE, ESQUIRE
 MCALLISTER, WESTMORELAND,
 VESPER & SCHWARTZ, P.A.
 BAYPORT ONE, YACHT CLUB DRIVE
 WEST ATLANTIC CITY, NJ 08401
 (609) 645-1111
 ATTORNEYS FOR MANVILLE CORPORATION ASBESTOS
 DISEASE COMPENSATION FUND

THOMAS GUNN and JULIA GUNN,)
 his wife; WILLIAM DEUTSCH and)
 MARIE DEUTSCH, his wife;)
 DANIEL INFANTI and CARMELLA)
 INFANTI, his wife; ANNETTE)
 JASKOWIAK, as Executrix of the)
 Estate of ARTHUR JASKOWIAK;)
 FRANK JUREWICZ; JAMES KING;)
 ROBERT LEARY and SHIRLEY)
 LEARY, his wife; ALLEN LEWIS)
 and JANET LEWIS, his wife;)
 ANTHONY MIGLIACCIO and)
 GERALDINE)
 MIGLIACCIO, his wife; PASQUAL)
 NAPPI; ANDREW STASIENKO and)
 GRACE STASIENKO, his wife;)
 ANDREW STASIK and IRMA STASIK,)
 his wife; RAYMOND STAVISH and)
 DELORES STAVISH, his wife;)
 JOHN THAYLER and FRANCES)
 THAYLER, his wife; BILLY WARD)
 and JANE WARD, his wife;)
 DOROTHY FROST, and ANDREW)
 FROST, her husband,)

Plaintiffs,)

v.)

THE CELOTEX CORPORATION,)
 successor-in-interest to the)
 PHILIP CAREY MANUFACTURING)
 COMPANY, PHILIP CAREY)
 CORPORATION, SMITH AND)
 KANZLER, BRIGGS MANUFACTURING,)
 AND PANACON CORPORATION;)
 A.C.&S., INC., a/k/a A CANDS,)
 INC., formerly known as)
 ARMSTRONG CONTRACTING AND)
 SUPPLY CORPORATION; ARMSTRONG)
 WORLD INDUSTRIES, INC.,)
 formerly known as ARMSTRONG)

UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY
 CIVIL ACTION NUMBER 86-5090

ASBESTOS LITIGATION

THIRD-PARTY COMPLAINT AGAINST
 THE MANVILLE PERSONAL INJURY
 TRUST

CORK COMPANY; BIRD & SONS,)
 INC.; CAREY-CANADIAN MINES,)
 LTD.; EAGLE-PICHER INDUSTRIES,)
 INC.; NATIONAL LEAD)
 INDUSTRIES; FIBREBOARD)
 CORPORATION; JOHN DOE (1);)
 JOHN DOE (2); JOHN DOE (3);)
 JOHN DOE (4); JOHN DOE (4);)
 JOHN DOE (5); JOHN DOE (6);)
 JOHN DOE (7); KEENE CORPORA-)
 TION, Individually and as)
 successor-in-interest to)
 KEENE BUILDING PRODUCTS and)
 BALDWIN, EHRET, & HILL; CROWN)
 CORK AND SEAL CORPORATION,)
 successor-in-interest to)
 MUNDET CORK CORPORATION;)
 NICOLET, INC., Individually)
 and as successor-in interest)
 to KEASBEY & MATTISON COMPANY;)
 OWENS-CORNING FIBREGLAS CORP-)
 ORATION; OWENS-ILLINOIS, INC.;)
 PITTSBURGH CORNING CORPORA-)
 TION; RAYMARK INDUSTRIES, INC.)
 Individually and formerly)
 known as RAYBESTOS-MANHATTAN,)
 INC.; SOUTHERN TEXTILE CORPOR-)
 ATION, formerly known as)
 SOUTHERN ASBESTOS, a wholly)
 owned subsidiary of H. K.)
 PORTER CO., INC.; GARLOCK,)
 INC.; PORTER-HAYDEN COMPANY;)
 JOHN CRANE-HOUDAILE, INC.,)

Defendants.)

and)

ARMSTRONG WORLD INDUSTRIES,)
 INC.; ACandS, INC.; THE)
 CELOTEX CORPORATION;)
 FIBREBOARD CORPORATION; KEENE)
 CORPORATION; OWENS-ILLINOIS,)
 INC.; PITTSBURGH CORNING,)
 INC.; and PORTER-HAYDEN COMPA-)
 NY;)

Defendants-Third-)
 Party Plaintiffs,)

v.
MANVILLE PERSONAL INJURY
TRUST.

Third-Party
Defendant

**DEFENDANT MANVILLE CORPORATION ASBESTOS
DISEASE COMPENSATION FUND'S
ANSWERS TO INTERROGATORIES**

Defendant Manville Corporation Asbestos Disease Compensation Fund (hereafter "the Fund"), by and through its attorneys, MCALLISTER, WESTMORELAND, VESPER & SCHWARTZ, P.A. hereby submits the following answers to Form B Interrogatories to Defendants.

PRELIMINARY MATTERS

The Fund objects to these Interrogatories to the extent that they ask for information relating to the Defendant's involvement in the asbestos industry. The Fund has never been involved in the manufacture, sale or distribution of asbestos or asbestos containing products. Nevertheless, the Fund interprets these questions to relate to Manville Corporation, its predecessors or subsidiaries (hereafter "related entities").

The Fund objects to these Interrogatories to the extent that they call for production of documents entitled to protection as privileged attorney client communications or attorney work product.

The Fund reserves the right to supplement these responses to the extent that new or different information becomes available to it.

ANSWERS TO PART A

A.1. Where is defendant's corporate headquarters located?

ANSWER: Not applicable.

A.2. Set forth the state in which defendant is incorporated in and the date of incorporation there.

ANSWER: Not applicable.

A.3. Has defendant ever been incorporated under the laws of the State of New Jersey? If so, set forth the inclusive date the defendant was incorporated here.

ANSWER: Not applicable.

A.4. Has defendant ever maintained an office in the State of New Jersey? If so, indicate where this office was located and set forth the inclusive dates of its operation here and describe what function it served. In addition, set forth names, addresses and job positions of the individuals who staffed the office.

a. describe the type of business defendant did in New Jersey.

ANSWER: Not applicable.

A.5. Does defendant have an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.

ANSWER: Not applicable.

A.6. Has defendant ever had an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.

ANSWER: Not applicable.

A.7. State the name and address of defendant's corporate officers and indicate the respective offices they hold.

ANSWER: Not applicable.

A.8. Has defendant ever done business in the State of New Jersey?

ANSWER: Not applicable.

A.9. If the answer to the previous interrogatory is in the affirmative, state:

a. the inclusive dates the defendant did do business in the State of New Jersey;

b. where in New Jersey it did business.

ANSWER: Not applicable.

A.10. Set forth the following information about each entity supplied in your answer to Interrogatory B.4.:

a. the State or County of each entity's incorporation;

b. the corporate business headquarters of each entity from the date it was established until the present.

ANSWER: Not applicable.

ANSWERS TO PART B

B.1. State the name, address and job position of each and every individual signing these interrogatories on behalf of the defendant.

a. state the name, address and employer and job position of each person, whether defendant's employees or otherwise, who were consulted with or who assisted in the answering of these interrogatories.

ANSWER: These answers to Interrogatories are signed by a representative of the Manville Personal Injury Settlement Trust, 1825 Eye Street, N. W., Washington, D.C. 20006-1202, who does not have personal knowledge of the facts contained in these responses. Rather, the answers have been prepared by attorneys representing the Fund using documents available to them.

B.2. Give a full and detailed description of the nature of the business that your company is engaged in.

ANSWER: The Manville Corporation Asbestos Disease Compensation Fund is the name under which the Manville Personal Injury Settlement Trust (hereafter "the Trust") can be sued in asbestos related litigation. The Trust was created pursuant to the

Manville Corporation Second Amended and Restated Plan of Reorganization, United States Bankruptcy Court, Southern District of New York, November 28, 1988 (hereafter "the Plan"). A full description of the Trust's responsibilities is contained therein. A copy of the Plan will be produced at the records repository maintained by the Trust in Denver, Colorado, at a time convenient to the parties.

Under the Plan, the Trust is to assume liability for all asbestos related personal injury claims against Manville Corporation, its predecessors and subsidiaries (hereafter "related entities"). The purpose of the Trust is to provide fair and equitable compensation to individuals who have been injured as a result of exposure to asbestos or asbestos containing products sold by Manville Corporation or related entities.

B.3. When did your company commence its business?

ANSWER: The Fund officially assumed the liability for all asbestos health claims against Manville Corporation and related entities on November 28, 1988. See also answer to Interrogatory No. B.4.

B.4.a. Are or have any of defendant's predecessors, affiliates, subsidiaries, or parent corporations engaged in the mining, sale and distribution of asbestos and/or asbestos fiber and/or asbestos containing insulation products? If so, state the name of each such entity, describe the nature of the involvement that each entity has or has had in the mining, distribution or sale of these products and materials, and set forth the inclusive dates each was involved in each aspect of this business.

b. as to each such entity referred to in (a) above, state:

1. the relationship between defendant and each such entity;
2. the date each such relationship began and terminated;
3. the names and addresses of each such entity's corporate officers and Board of Directors;
4. the names and addresses of your corporate officers and Board of Directors.

ANSWER: Yes. Manville Corporation or related entities engaged in the manufacture and sale of asbestos containing products, as well as the mining, milling and sale of asbestos fiber. The H.W. Johns Company, a predecessor to Manville Corporation, first commenced business in 1858. Manville

Corporation or related entities first began to mine, mill and sell asbestos fiber with the purchase of the Jeffrey Mine in Asbestos, Quebec, in 1916.

Johns-Manville Corporation was incorporated in 1926. Johns-Manville Products Corporation, organized in 1927, was responsible for the manufacture of asbestos containing products. Johns-Manville Sales Corporation, organized in 1929, was responsible for the sale of asbestos containing products. In 1975, Johns-Manville Products Corporation merged into Johns-Manville Sales Corporation.

Manville Corporation and related entities discontinued the manufacture and sale of most asbestos containing thermal insulation products in 1972 or 1973. Manville Corporation or related entities discontinued the mining, milling and sale of asbestos fiber on September 9, 1983. Manville Corporation or related entities discontinued the manufacture and sale of all asbestos containing products by 1985.

The companies listed below as current or previous subsidiaries of Manville or related entities may have been engaged in the mining, sale or distribution of asbestos or asbestos-containing products.

CURRENT MANVILLE SUBSIDIARIES

(once asbestos-related companies)

Cobra Canada, Inc. (50% owned by American Standard)
Name changed from Cobra Friction Products, Limited - 1981

Johns-Manville Corporation
Incorporated - 1926

Johns-Manville East Africa, Limited
Incorporated - 1968

Johns-Manville India, Limited
Incorporated - 1965

Manville (Great Britain) Limited
Name changed from Johns-Manville (Great Britain) Limited
- 1982

Manville De France S.A.
Name changed from Johns-Manville De France S.A. - 1982

Manville Do Brazil Ltda.
Name changed from Johns-Manville Do Brazil - 1982

Manville Italian S.p.A.
Name changed from Johns-Manville Italiana S.P.A - 1982

Manville Japan, Limited

Name changed from Johns-Manville Japan, Limited - 1981

Manville Mexicana S.A. de C.V.

Name changed from Johns-Manville Mexicana, S.A. de C.V. - 1982

Manville Sales Corporation

Name changed from Johns-Manville Sales Corporation - 1985

Manville Sudamericana Ltda

Name changed from Johns-Manville Sudamericana, Limited - 1982

New Materials, Inc.

Incorporated - 1958

Railroad Friction Products (50% owned by American Standard)

Incorporated - 1954

Termoacusticos, S.A. de C.V.

Incorporated - 1973

PREVIOUS MANVILLE SUBSIDIARIES

Acoustical Construction Corporation

Incorporated - 1930 in New York

Dissolved - 1946

American Mineral Company

Name changed from Seehaver Clay & Mineral Company - 1947

Merged into Desert Minerals, Inc. - 1975

Asbestos Construction Company, Inc.

Incorporated - 1922

Name changed to Johns-Manville Insulation Contracting & Supply
Company - 1960

Asbestos and Danville Railway Company

Incorporated - 1897

Divestment - 1982

Banner Rock Corporation

Incorporated - 1929

Dissolved - 1938

Beton et Mollith S.A.

Incorporated - 1923

Name changed to Johns-Manville S.A

Canadian Johns-Manville Asbestos, Limited

Incorporated - 1954

Name changed to Johns-Manville Amiante Canada, Inc. - 1980

Canadian Johns-Manville Ontario, Limited

Incorporate - 1950

Dissolved - 1968

Celite Corporation

Name changed from Fibre Corporation - 1928

Dissolved - 1939

Chem Blend System Corporation

Incorporated - 1965

1970 - Acquisition

Dissolved - 1972

Coalinga Asbestos Company, Inc.

Incorporated - 1960

Merged into Johns-Manville Sales Corporation - 1975

Cobra Friction Products, Limited (50% Held by J-M - 1981)

Incorporated - 1960

Name changed to Cobra Canada, Inc.

Crown Tuft Carpet, Inc.

Incorporated - 1963

Merged into Johns-Manville Products Corporation - 1972

Divestment to Celotex Corporation - 1972

Delaware Johns-Manville Corporation

Incorporated - 1927

Name changed to Johns-Manville Corporation of Delaware - 1927

Desert Minerals, Inc.

Incorporated - 1956

Merged into L. Grantham Corporation - 1975

Fibre Corporation

Incorporated - 1914

Name changed to Celite Corporation - 1928

Grantham Mines Corporation

Incorporated - 1969

Name changed to L. Grantham Corporation - 1969

Holophane Company, Limited (The)

Incorporated - 1911

Amalgamated with Canadian Johns-Manville Company, Limited
- 1978

Holophane S.A. de C.V.
Incorporated - 1962
Divestment - 1988

Interstate Flooring and Construction Company, Inc.
Incorporated - 1930
Dissolved - unknown

Jayem Exploration Company, Limited
Incorporated - 1961
Dissolved - 1980

John Brand Corporation
Name changed from Johns-Manville Dutch Brand Products - 1970
Dissolved - 1972

Johns-Manville (Great Britain) Limited
Name changed from Johns-Manville Company, Limited - 1966
Name changed to Manville (Great Britain) (Limited) - 1982

Johns-Manville (United Kingdom), Limited
Incorporated - 1959
Merged into Johns-Manville Company, Limited - 1965

H. W. Johns Manufacturing Company
Incorporated - 1858
Reorganized as H. W. Johns Manufacturing Company - 1874
Merged with Manville Covering to become H. W. Johns-Manville
Company - 1901

H. W. Johns-Manville Company
Merged with Manville Covering H. W. Johns Manufacturing
Company - 1901
Name changed to Johns-Manville, Inc. - 1920

Johns-Manville Amiante Canada, Inc.
Name changed from Canadian Johns-Manville Asbestos, Limited
- 1980
Sold - 1983

Johns-Manville Belgium, S.A.
Incorporated - 1961
Divestment - 1983

Johns-Manville Boley, Limited
Incorporated - 1931
Name changed to Johns-Manville Sudamericana, Limited - 1955

Johns-Manville Canada, Inc.
Incorporated - 1978
Sold - 1983

Johns-Manville Ceiling Corporation

Incorporated - 1973

Name changed to Southern Johns-Manville Products Corporation
(Delaware) - 1973

Johns-Manville Company, Limited (United Kingdom)

Incorporated - 1939

Name changed to Johns-Manville (Great Britain), Limited - 1966

Johns-Manville Construction

Incorporated - 1956

Name changed to Johns-Manville Service Corporation - 1960

Johns-Manville Corporation of Delaware

Name changed from Delaware Johns-Manville Corporation - 1927

Name changed to Johns-Manville Products Corporation - 1932

Johns-Manville De France S.A.

Name changed from Societe Anciens Etablissements Hordot and
Chataignon, Flechet et Cie., Succs. - 1961

Name changed to Manville de France S.A. - 1982

Johns-Manville De Ventas S.A. de C.V.

Incorporated - 1962

Name changed to Johns-Manville Mexicana, S.A. de C.V. - 1962

Johns-Manville Development Corporation

Name changed to Johns-Manville Service Corporation - 1973

Merged into Johns-Manville Sales Corporation - 1975

Johns-Manville Do Brazil Isolantes Termicos, Limited

Name changed from Johns-Manville do Brazil S/A Isolantes
Termicos - 1977

Name changed to Manville Do Brazil, Limited - 1982

Johns-Manville Do Brazil S/A - Isolantes Termicos

Name changed from Magnebras, S.A. - 1976

Name changed to Johns-Manville Do Brazil Isolantes Termicos
Ltda - 1977

Johns-Manville Dutch Brand Products Corporation

Name changed from Van Cleef Brothers, Inc. - 1955

Name changed to John Brand Corporation - 1970

Johns-Manville Equipment Corporation

Incorporated - 1961

Merged with Johns-Manville Sales Corporation - 1973

Johns-Manville, Inc.

Name changed from H. W. Johns-Manville Company - 1920

Dissolved - 1927

Johns-Manville Insulation Contracting & Supply Company, Inc.
 Name changed from Asbestos Construction Company, Inc. - 1960
 Merged into Johns-Manville Sales Corporation - 1962

Johns-Manville International Corporation
 Incorporated - 1929
 Merged into Manville Sales Corporation - 1986

Johns-Manville Italiana S.p.A.
 Name changed from Silex S.p.A. - unknown
 Name changed to Manville Italiana S.p.A. - 1982

Johns-Manville Japan, Limited
 Name changed from New Materials Kabushiki Kaisha - 1978
 Name changed to Manville Japan, Limited - 1981

Johns-Manville Mexicana S.A. de C.V.
 Name changed from Johns-Manville de Ventas S.A. de C.V. - 1962
 Name changed to Manville Mexicana S.A. de C.V. - 1982

Johns-Manville Mining and Trading
 Incorporated - 1966
 Merged into Johns-Manville Corporation - 1973

Johns-Manville (Overseas) Limited
 Incorporated - 1958
 Dissolved - 1981

Johns-Manville Products Corporation of California
 Incorporated - 1956
 Merged into Johns-Manville Products Corporation - 1972

Johns-Manville Products Corporation
 Name changed from Johns-Manville Corporation of Delaware
 - 1932
 Merged with Johns-Manville Sales Corporation - 1975

Johns-Manville Products Corporation of Georgia
 Incorporated - 1955
 Merged into Johns-Manville Corporation - 1970

Johns-Manville Products Corporation of Massachusetts
 Incorporated - 1939
 Merged into Johns-Manville Products Corporation - 1972

Johns-Manville Products Corporation of Mississippi
 Incorporated - 1958
Dissolved - 1966

Johns-Manville Products Corporation of Ohio
 Incorporated - 1959
 Dissolved - 1972

Johns-Manville Products Corporation of Oregon
 Incorporated - 1956
 Merged into Johns-Manville Corporation - 1962

Johns-Manville Products Corporation of Pennsylvania
 Incorporated - 1940
 Merged into Johns-Manville Sales Corporation - 1975

Johns-Manville S.A.
 Name changed from Beton et Mollith
 Divestment - 1983

Johns-Manville Sales Corporation
 Incorporate - 1929
 Name changed to Manville Sales Corporation - 1985

Johns-Manville Service Corporation
 Name changed from Johns-Manville Construction Corporation
 - 1960
 Name changed to Johns-Manville Development Corporation - 1973

Johns-Manville Sudamericana, Limitada
 Name changed from Johns-Manville Boley, Limited - 1955
 Name changed to Manville Sudamericana, Limitada - 1982

Kingsey Falls Paper, Inc. (50% owned by Johns-Manville)
 Incorporated - 1972
 Sold - 1984

L. Grantham Corporation
 Name changed from Grantham Mines Corporation - 1969
 1972 - Acquisition
 Merged into Johns-Manville Sales Corporation - 1978

Magnebras, S.A.
 Incorporated - 1957
 1973 - Acquisition
 Name changed to Johns-Manville Do Brazil, S.A. - Isolantes
 Termicos - 1976

Manvilglass, Limited
 Incorporated - 1970
 Name changed to Thermocoustic Insulations, Limited - 1976

Manville Covering Company
 Incorporated - 1886
 Merged into H. W. Johns Manufacturing Company - 1901

New Materials Kabushiki Kaisha
 Incorporated - 1959
 Name changed to Johns-Manville Japan, Limited - 1972

Nicely Corporation (The)
Incorporated - 1933
Dissolved - 1946

Revere Mills, Inc.
Incorporated - 1964
Name changed to Revere, Inc. - 1965

Revere, Inc.
Name changed from Revere Mills, Inc. - 1965
Merged into Crown Tuft Carpet, Inc. - 1972

Seehaver Clay and Mineral Company
Incorporated - 1946
Name changed to American Mineral Company - 1947

Silex S.p.A.
Name changed to Societa Anonima Immobiliare esari - 1940
Name changed to Johns-Manville Italiana S.p.A. - 1962

Societa Accomandita Semplice Silex
Incorporated - 1940
Merged into Societa Anonima Immobiliare Cesari - 1940

Societa Anonima Immobiliare Cesari
Incorporated - 1939
Name changed to Silex S.p.A. - 1940

Societe Anciens Etablissements Hordot and Chataignon, Flechet et Cie., Succs.
Incorporated - 1961
Name changed to Johns-Manville De France S.A. - 1961

Southern Johns-Manville Products Corporation (Delaware)
Name changed from Johns-Manville Ceiling Corporation - 1973
Merged into Johns-Manville Sales Corporation - 1979

Table Mountain Asbestos Company, Inc.
Incorporated - 1962
Dissolved - 1967

Thermocoustic Insulations, Limited
Name changed from Manvilglass, Limited - 1976
Merged into Johns-Manville Sudamericana Limitada - 1976

Van Cleef Brothers, Inc.
Name changed from Vee Cee Brothers, Inc. - 1947
Name changed to Johns-Manville Dutch Brand Products Corporation - 1955

Vee Cee Brothers, Inc.

Incorporated - 1947

Name changed to Van Cleef Brothers, Inc. - 1947

Additionally, the names of any consolidation, merger or purchase of assets of any company can be obtained by a review of the Annual Reports of Manville Corporation and related entities. Copies of such reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time agreed upon by the parties.

All of the entities identified below were engaged in the mining, milling or sale of asbestos fiber, or the manufacture or sale of asbestos containing products from their inception.

The names of the members of the Board of Directors can be obtained by a review of the Annual Reports of Manville and the related entities. Copies of such reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be made available for inspection and copying at a time convenient to the parties.

The officers of the principal Manville entities involved in the asbestos industry are as follows:

JOHNS-MANVILLE CORPORATION

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1926-27	None	H.E. Manville	A.C. Hoyt
1927-29	H.E. Manville	T.F. Merseles	L.H. Brown
1929-38	W.R. Seigle	L.H. Brown	E.M. Voorhees
1938-40	H.E. Manville	L.H. Brown	V. Brown
1940-46	None	L.H. Brown	V. Brown
1946-52	L.H. Brown	R.W. Lea	V. Brown
1952-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1957-60	A.R. Fisher	A.R. Fisher	H.M. Ball
1960-67	A.R. Fisher	C.B. Burnett	H.M. Ball
1967-71	None	C.B. Burnett	H.M. Ball
1971-73	None	W.R. Goodwin	H.M. Ball
1973-74	None	W.R. Goodwin	J.A. McKinney G.E. Parker
1974-75	None	W.R. Goodwin	A.B. Marchant G.E. Parker
1975-76	None	W.R. Goodwin	J.A. McKinney G.E. Parker
1976-77	None	J.A. McKinney	G.E. Parker
1977-78	J.A. McKinney	J.A. McKinney	G.E. Parker
1978-82	J.A. McKinney	F.L. Pundsack	G.E. Parker

1982-83	J.A. McKinney	J.A. McKinney	G.E. Parker
1983-84	J.A. McKinney	J.A. McKinney	R.A. Boardman
1984-86	J.A. McKinney	J.T. Hulce	R.A. Boardman
1986-Present	G.C. Dillon	W.T. Stephens	R.A. Boardman

JOHNS-MANVILLE SALES CORPORATION

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1929-30	None	L.R. Hoff	C.L. Sager
1931	L.H. Brown	L.R. Hoff	C.L. Sager
1932-35	L.H. Brown	L.R. Hoff	E.M. Voorhees
1936-45	L.H. Brown	L.R. Hoff	V. Brown
1946	None	L.H. Brown	V. Brown
1947-50	L.H. Brown	R.W. Lea	V. Brown
1951-52	L.M. Cassidy	A.R. Fisher	V. Brown
1953-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-68	None	C.B. Burnett	H.M. Ball
1969-72	None	G.H. Martens	H.M. Ball
1973	None	None	J.A. McKinney
1974-75	None	R.J. Cuje	J.A. McKinney
1976	None	W.R. Goodwin	J.A. McKinney
1976-81	None	J.A. McKinney	G.E. Parker
1/82-10/82	J.A. McKinney	F.L. Pundsack	G.E. Parker
10/82-83	J.A. McKinney	J.T. Hulce	G.E. Parker
1983-85	J.A. McKinney	J.T. Hulce	R.A. Boardman
12/31/85	Name changed to Manville Sales Corporation		
12/85-4/86	J.A. McKinney	J.T. Hulce	R.A. Boardman
4/86-10/86	J.A. McKinney	W.T. Stephens	R.A. Boardman
10/86-Present	None	W.T. Stephens	R.A. Boardman

JOHNS-MANVILLE PRODUCTS CORPORATION

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1927	None	W.R. Seigle	A.C. Hoyt
1928-31	None	W.R. Seigle	E.M. Voorhees
1932-42	L.H. Brown	S.A. Williams	V. Brown
1943	L.H. Brown	S.A. Williams	R. Hackney
1944-45	L.H. Brown	S.A. Williams	V. Brown
1946	None	L.H. Brown	V. Brown

1947-50	L.H. Brown	R.W. Lea	V. Brown
1951	None	L.M. Cassidy	V. Brown
1952	L.M. Cassidy	A.R. Fisher	V. Brown
1953-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-68	None	C.B. Burnett	H.M. Ball
1969-72	None	F.E. Dutcher	H.M. Ball
1973	None	F.E. Dutcher	J.A. McKinney
1974-75	None	J.E. Hesse	J.A. McKinney

Johns-Manville Products Corporation merged into Johns-Manville Sales Corporation effective 12/31/75.

JOHNS-MANVILLE CANADA, INC.

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1918-19	None	G.W. McDougall	J.G. Cartwright
1919-25	None	T.F. Manville	H.E. Manville
1925-27	None	H.E. Manville	H.E. Manville
1927-28	None	H.E. Manville	A.C. Hoyt
1928-29	None	T.F. Merseles	A.C. Hoyt
1929-30	None	T.F. Merseles	E.M. Voorhees
1930-37	None	L.H. Brown	E.M. Voorhees
1937-39	None	L.H. Brown	V. Brown
1939-45	L.H. Brown	S.A. Williams	V. Brown
1945-46	L.H. Brown	R.W. Lea	V. Brown
1946-51	L.H. Brown	L.H. Brown	V. Brown
1951-52	L.M. Cassidy	L.M. Cassidy	H.M. Ball
1952-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1957-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1959-61	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-67	K.V. Lindell	A.G. Sinclair	W.H. Soutar
1967-71	K.V. Lindell	A.G. Sinclair	J. Kaczkowski
1971-72	None	A.G. Sinclair	G.A. Piche
1972-73	None	J.R.M. Hutcheson	G.A. Piche
1973-74	None	J.R.M. Hutcheson	G.A. Piche
1974-82	J.R.M. Hutcheson	G.P. Loubert	G.A. Piche
1982-83	J.P. Power	J.P. Power	G.A. Piche

Johns-Manville Canada, Inc. was sold 9/16/83.

JOHNS-MANVILLE INTERNATIONAL CORPORATION

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1929-32	L.H. Brown	W.R. Seigle	C.L. Sager
1932-36	L.H. Brown	W.R. Seigle	E.M. Voorhees
1936-37	L.H. Brown	W.R. Seigle	V. Brown
1937-46	L.H. Brown	E.S. Crosby	V. Brown
1946-50	R.W. Lea	E.S. Crosby	V. Brown
1950-51	L.H. Brown	R.W. Lea	V. Brown
1951-52	L.M. Cassidy	A.R. Fischer	V. Brown
1952-57	L.M. Cassidy	A.R. Fischer	H.M. Ball
1957-60	A.R. Fischer	A.R. Fischer	H.M. Ball
1960-68	None	C.B. Burnett	H.M. Ball
1968-72	None	D.T. Colton	H.M. Ball
1972-73	None	J.B. Jobe	W.P.S. Breese
1973-74	None	W.L. VanDerBeek	W.P.S. Breese
1974-75	None	H.B. Moreno	W.P.S. Breese
3/75-5/75	None	H.B. Moreno	J.T. Hulce
1975-80	None	H.B. Moreno	G.E. Parker
1980-83	None	A.L. Cini	J.L. Brown
1983-86	None	J.T. Hulce	J.L. Brown
1985-3/86	None	J.P. Cashman	J.L. Brown
3/86-12/86	None	S.R. Heath	J.L. Brown

Johns-Manville International Corporation merged into Manville Sales Corporation effective 12/22/86.

JOHNS-MANVILLE AMIANTE CANADA, INC.

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1954	None	R.D. Weldon	R.T. Clarkson
1954-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	None	C.B. Burnett	H.M. Ball
1961-66	None	K.V. Lindell	W.H. Soutar
1967-70	None	K.V. Lindell	J. Kaczowski
1971-81	None	J.R.M. Hutcheson	G.A. Piche
1982-83	J.P. Power	J.P. Power	G.A. Piche

Johns-Manville Amiante Canada, Inc. was sold 9/16/83.

B.5. From the year 1925 until the present, identify and state the address of any organization in which defendant, its officers, agents or employees have belonged, having anything to do

with setting standards, regulations or the conducting of research into the use of asbestos, asbestos products or asbestos fiber.

ANSWER: Manville Corporation or related entities belonged to the American Society for Testing and Materials (hereafter referred to as "ASTM") which is a nonprofit corporation formed in 1898 for the development of standards on characteristics and performance of materials, products, systems, and services, and the promotion of related knowledge. The ASTM is the world's largest source of voluntary consensus standards. See also answer to Interrogatory No. B.6.

Manville Corporation or related entities belonged to the following organizations which conducted research regarding the health effects of exposure to asbestos or asbestos containing products:

Asbestos Cement Pipe Producers Association
1745 Jefferson Davis Highway
Arlington, VA 22209
(approximately 1972 to early 1980s) ..

Asbestos Information Association/North America
1745 Jefferson Davis Highway
Arlington, VA 22202
(approximately 1971 to early 1980s)

Asbestos Textile Institute
P.O. Box 471
Willow Grove, PA 19090
(November 16, 1944 to 1973)

Canadian Asbestos Information Centre
(formerly Institute of Occupational and Environmental Health)
1130 Sherbrooke Street West, Suite 410
Montreal, Quebec
H3A 2H8 CANADA
(1966 to 1983)

Industrial Health Foundation
(formerly Industrial Hygiene Foundation)
34 Penn Circle West
Pittsburgh, PA 15206
(1936 through 1980s)

National Insulation Contractors Association
address unknown
(1954 through 1980s)

National Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, NY 10017
(approximately 1958 to 1968)

Quebec Asbestos Mining Association
Suite 412, 5 Place Ville Marie
Montreal, Quebec
H3B 2G2 Canada
(approximately 1930 to 1983)

Thermal Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, NY 10017
(approximately 1969 through 1980s)

B.6. Has defendant ever been a member of or affiliated with any trade groups, professional associations or organizations? If so, identify each such group, association or organization and set forth the inclusive dates of defendant's membership in each.

ANSWER: In addition to the organizations identified in answer to Interrogatory No. B.5., Manville Corporation or related entities belong or have belonged to the following organizations which related to asbestos or asbestos containing products:

American Society for Testing and Materials
1916 Race Street
Philadelphia, PA 19103
(approximately 1930s through 1980s)

Asbestos Cement Product Association (defunct)
New York, NY
(approximately 1955 to 1967)

Automotive Parts Rebuilders Association
6849 Old Dominion Drive
McLean, VA 22101
(approximately 1950 to 1972)

Brake Lining Materials Association (defunct)
370 Lexington Avenue
New York, NY 10017
(approximately 1926 to 1949)

Friction Materials Standards Institute
E-210 State Highway, Number 4
Paramus, NJ 07652
(approximately 1949 to 1972)

Mid-West Insulation Contractor's Association
2202 Hanscom Boulevard
Omaha, NE 68105
(approximately 1962 through 1980s)

National Building Material Distributors Association
1701 Lake Avenue
Glenview, IL 60025
(1966 through 1980s)

Resilient Floor Covering Institute
966 Hungerford Drive
Suite 12-B
Rockville, MD 20850
(1978 through 1980s)

Southwest Insulation Contractor's Association
1406 Third National Bank Building
Dayton, OH 45402
(sometime after 1958 to present)

Western Insulation Contractor's Association
83 Hazel Lane
Piedmont, CA 94611
(1955 to present)

B.7. Has defendant ever been a member of or affiliated with the Asbestos Textile Institute? If so, indicate when your company was affiliated or was a member of this organization.

ANSWER: See answer to Interrogatory No. B.5.

B.8. Does your company publish or distribute a manual or booklet which describes the nature of the business that defendant is engaged in? If so, set forth the title of such manual or booklet, indicate when it was published and attach a copy of same hereto.

ANSWER: Manville Corporation publishes an Annual Report to Shareholders, and also files quarterly and annual reports with the Securities and Exchange Commission. These reports are public records. Copies of the Annual Reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

The Fund prepares and files quarterly reports to the United States Bankruptcy Court, Southern District of New York. Copies of the Fund's quarterly reports to the Bankruptcy Court will be produced at a time and place agreed upon by the parties.

B.9. Has any employee or representative of your corporation ever attended a meeting of the Asbestos Textile

Institute? If so, identify each such individual who attended these meetings and set forth the dates on which each such individual went to such a conference or meeting.

ANSWER: Employees of Manville Corporation or related entities attended meetings of the Asbestos Textile Institute. The minutes of the Asbestos Textile Institute indicate the individuals in attendance at each meeting, as well as their affiliations. Copies of these minutes are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

B.10. Has your company ever been a member of, affiliated with or provided funding for the Industrial Hygiene Foundation? If so, indicate when your company was a member or affiliated with this organization and set forth the dates, if applicable, when you provided funding to this organization.

ANSWER: Yes. See answers to Interrogatories No. B.5 and B.24.

B.11. Does your company have a Board of Directors?

ANSWER: Manville Corporation has a Board of Directors. The Fund does not have a Board of Directors.

B.12. Does your company's Board of Directors conduct meetings?

ANSWER: The Board of Directors of Manville Corporation conducts meetings.

B.13. Have minutes of the Board of Directors meetings been taken and maintained by your company? If so, indicate who has custody of the minutes at this time.

ANSWER: Minutes are kept of the Manville Corporation Board of Directors meetings. Copies of the non-privileged portions of these minutes are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

B.14. Has your company, and/or its subsidiaries or affiliates ever manufactured or distributed asbestos containing products?

ANSWER: Manville Corporation or related entities have manufactured or distributed asbestos and asbestos containing products.

B.15. Give a complete and detailed description of the particular qualities that asbestos has or had that caused your

company and/or its subsidiary or affiliate to utilize asbestos in your products.

ANSWER: Asbestos was used by Manville Corporation or related entities in a variety of products for a variety of reasons. Generally, however, asbestos was valued because of its strength, low conductivity, light weight, resistance to corrosion and fire, cost, availability, and the lack of substitute materials.

B.16. Did any of the entities from whom you received asbestos fiber or any of the entities referred to in B.6., B.7., B.9. and B.10. ever inform you or your company's employees that asbestos was potentially hazardous to the health of individuals who were exposed to it?

ANSWER: Yes. Some of the organizations listed sponsored or co-sponsored studies regarding the health effects of asbestos exposure, and the results of those studies were generally shared among members. In addition, some of these organizations prepared or distributed materials which addressed asbestos health issues. The Asbestos Cement Pipe Producers Association, Asbestos Information Association, Asbestos Textile Institute, the Canadian Asbestos Information Centre, Industrial Health Foundation, National Insulation Contractors Association, National Insulation Manufacturers Association and the Quebec Asbestos Mining Association have all been involved from time to time in either health research or in distribution and dissemination of information regarding the possible hazards associated with asbestos exposure. See answer to Interrogatory No. B.21.

All of these activities are reflected in the minutes of Association meetings and in correspondence between representatives of the various member organizations relating to asbestos health issues. Such documents will be produced at the records repository maintained by the Fund in Denver, Colorado at a time convenient to the parties. See answer to Interrogatory No. B.39.

B.17. If so, for each such company that transmitted such information to you and your company, set forth the following information:

- a. the name of each and every entity that informed your company that asbestos was potentially hazardous to health;
- b. the dates you received this information from each such company;
- c. indicate how this information was transmitted to you;
- d. the substance of each warning;

- e. annex hereto copies of each such warning.

ANSWER: See answer to Interrogatory No. B.16.

B.13. Has defendant distributed or sold asbestos or asbestos containing products in the State of New Jersey? If so, set forth the following information:

a. the date that defendant commenced selling asbestos or asbestos containing products in the State of New Jersey;

b. the date the defendant terminated the sale of asbestos or asbestos containing products in the State of New Jersey;

c. the areas of New Jersey where asbestos or asbestos containing products were sold.

ANSWER: Manville Corporation or related entities sold asbestos and asbestos containing products in New Jersey for the past several decades. See answer to Interrogatory No. B.4.

B.19. Did defendant ever affix any warnings to any of the asbestos or asbestos containing products it marketed and distributed? If so, for each such product that contained a warning, set forth the following information?

a. the brand and trade name of each such product that contained a warning;

b. the date a warning was attached to each such product;

c. the substance of each warning;

d. annex hereto copies of each such warning.

ANSWER: Manville Corporation or related entities placed warning labels on the packaging of its industrial thermal insulation products containing asbestos which might release dust upon installation. These labels and dates of use are as follows:

1964 to 1970

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.

INHALATION OF ASBESTOS IN EXCESSIVE
QUANTITIES OVER LONG PERIODS OF TIME
MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT
IS HANDLED, AVOID BREATHING THE DUST.

IF ADEQUATE VENTILATION CONTROL IS NOT
POSSIBLE, WEAR RESPIRATORS APPROVED BY
THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS-
PRODUCING DUSTS.

1970 to 1972

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.
AVOID BREATHING THE DUST. INHALATION
OF ASBESTOS IN EXCESSIVE QUANTITIES
OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT
IS HANDLED, USE PROPER PROTECTION.

IF PROPER DUST CONTROL CANNOT BE PROVIDED,
RESPIRATORS APPROVED BY THE U.S. BUREAU OF
MINES FOR PROTECTION AGAINST THE PNEUMOCONIOSIS-
PRODUCING DUSTS SHOULD BE WORN.

1972 to 1978

CAUTION

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

1978 to 1985

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID BREATHING DUST

BREATHING ASBESTOS DUST MAY
CAUSE SERIOUS BODILY HARM

SMOKING GREATLY INCREASES THE
RISK OF SERIOUS BODILY HARM

Manville began using such warning notices because in 1964 it was reported by a member of the medical profession that there might exist a risk to some persons who installed industrial insulation products containing asbestos, in that inhalation of excessive quantities of asbestos fibers over prolonged periods of time under certain conditions might create a risk of contracting asbestosis to some persons.

The label in use from 1972 to 1978 was prescribed by the United States Department of Labor, Occupational Safety and Health Administration (OSHA) pursuant to 29 C.F.R., Sec. 1910.1001, such regulation being promulgated by OSHA in 1972. This label was revised by Manville to include a no-smoking warning, implementation of which commenced in November 1978. In addition, product literature was available from sales personnel.

In addition, Manville placed warning notices on the packaging of its asbestos fiber. The warning labels and the dates of use are as follows:

1969 to 1972

CAUTION

THIS BAG CONTAINS ASBESTOS FIBER.

PERSONS EXPOSED TO THIS MATERIAL SHOULD
USE ADEQUATE PROTECTIVE DEVICES AS
INHALATION OF THIS MATERIAL OVER LONG
PERIODS MAY BE HARMFUL.

1972 to 1978

CAUTION

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

1978 to 1983

CAUTION
CONTAINS ASBESTOS FIBER
AVOID CREATING DUST
BREATHING ASBESTOS MAY CAUSE
SERIOUS BODILY HARM
SMOKING GREATLY INCREASES THE
RISK OF SERIOUS BODILY HARM

Use of warning labels commenced during 1969. The label in use from 1972 to 1978 was prescribed by the United States Department of Labor, Occupational Safety and Health Administration (OSHA) pursuant to 29 C.F.R., Sec. 1910.1001, such regulation being promulgated by OSHA in 1972. This label was revised by Manville to include a no-smoking warning, implementation of which commenced in November 1978. Manville also placed this warning on all bags containing asbestos fiber in five additional languages; i.e.: French, Dutch, German, Spanish and Japanese. Additional language may have been used from time to time.

See also answer to Interrogatory No. C.9. for identification of the brand or trade name of products, products containing a label, and the date the label was attached to such products.

B.20. Set forth the name, address and job position of each and every individual who took part in your company's decision to place a warning on its asbestos or asbestos containing products.

ANSWER: The selection of the wording of the text of the warning labels was made by a group of individuals representing the following departments at Manville: Environmental Control, Employee Relations, Executive, Legal and Product Marketing. The 1972 change in labeling was mandated by the federal government under the Occupational Safety and Health Act of 1970 and the standard promulgated thereunder for exposure to asbestos.

Beginning in the fall of 1974, all corporate labeling activities were within the jurisdiction of the Corporate Labeling Committee. Chairman of the Corporate Labeling Committee was Paul Kotin, M.D., Senior Vice President of Johns-Manville Corporation, Health, Safety and Environment Department, until his retirement in September, 1981.

On information and belief, the labeling of products at Manville Corporation is currently under the direct responsibility of each Product Manager in conjunction with the Corporate Labeling Committee, which consists of representatives from the operating

groups, Legal Department and Health Safety and Environment Department.

The following individuals have also been involved in the labeling of Manville Products:

Herbert M. Ball
(Deceased)

William P. S. Breese
255 Brookside Court
Knollwood, CO 80302

Edmund M. Fenner
(Deceased)

Hugh M. Jackson
5205 Sky Trail
Littleton, CO 80123

J. B. Jobe
2800 S. University, #64
Denver, CO 80210

J. P. Leineweber
(Deceased)

Irving J. Pedley
10015 Royal Oak Road, #348 3164
Sun City, AZ 85351

William B. Reitze
10870 Park Ridge Road
Littleton, CO 80123

Clifford L. Sheckler
(Deceased)

Kenneth W. Smith, M.D.
(Deceased)

B.21. Prior to 1964, did any employee of the defendant ever recommend that it utilize a warning on its asbestos containing products? If so, identify each such employee, indicate when he made such a recommendation, indicate what the recommendation was, to whom it was given and what action was taken thereon.

ANSWER: In 1944, Manville employees discussed a proposed California regulation which would have required the labeling of materials which contained one percent of asbestos or silica, if the materials "were to be used under conditions likely to give rise to dust." No warning or caution labels were adopted at that time.

In 1952, some employees of Manville or related entities discussed the possibility of placing a caution label on asbestos fiber shipped to Illinois, in an effort to observe rules and regulations promulgated by the Industrial Commission of Illinois which required the labeling of substances harmful to the health and safety of employees which, subsequently, may have included asbestos fiber.

In approximately July, 1958, some employees of Manville Corporation or related entities discussed the possibility of placing a caution label on sheets of Marinite and other asbestos products. The individuals involved in these discussions included the following:

Herbert M. Ball
William P. S. Breese
Thomas H. Eaton
E. D. Flavin
D. L. Hinmon
W. G. Hoffer
Hugh M. Jackson
J. B. Jobe
V. B. Padham
Irving J. Pedley
A. M. Schmidt
Kenneth W. Smith

It is not clear whether a recommendation was made, and if so, by whom. However, the decision was made to provide additional information regarding safe work practices in product literature relating to asbestos containing board products. No caution labels were adopted at that time.

See answer to Interrogatory No. B.20.

B.22. Has defendant ever established or maintained a library or libraries which in any way dealt with industrial hygiene, medicine, safety and engineering? If so, state:

- a. where the library was or is located;
- b. the names of all journals which that library subscribed to;
- c. for whom and for what purpose the library was established;
- d. whether there is an inventory of the books and publications which are or were in this library, and if so, attached a copy hereto.

ANSWER: Manville Corporation or related entities did maintain libraries of medical, scientific and technical information relating to asbestos. The Research & Development Library was formally established with full-time librarians in 1941, and is now located at Manville's Research & Engineering Center in Littleton, Colorado. The Health, Safety and Environment Department Library was formally established in 1974 and is also currently located at Manville's Research & Engineering Center in Littleton, Colorado. The following have served as librarians:

Research & Development

K. L. Kinder, Retired
Chief Librarian - 1946 to 1975
3 Par Circle
Littleton, CO 80123

Margaret Schmachtenberger
Librarian - 1951 to 1975
Chief Librarian - 1976 to 1980
7785 S. Native Dancer Trail
Evergreen, CO 80439

Judy Gerber
Chief Librarian - 1981 to 1987
4850 S. Ammons, #938
Littleton, CO 80123

Barbara Norton
Chief Librarian - 1987 to Present
Manville Sales Corporation
P.O. Box 5108
Denver, CO 80217

Health, Safety and Environment Department

Janet Doerfler McGrath
Librarian - October 1974 to July 31, 1982
18850 White Fawn Drive, Box 631
Monument, CO 80132

Kathy Hodges
Librarian - September 1, 1982 to 1983
P.O. Box 784
Alma, CO 80420

Connee Chandler
Librarian - 1983 to 1988
9136 E. Mansfield Avenue
Denver, CO 80237

Karen Wells
Librarian - 1988 to 1989
Manville Sales Corporation
P.O. Box 5108
Denver, CO 80217

Prior to its discontinuance in 1986, Manville's Corporate Information Center contained medical and scientific resource material relating to asbestos. Potentially relevant materials from this collection are currently located in the records repository maintained by the Fund in Denver, Colorado.

In addition, many individual employees, doctors and consultants of Manville maintained document collections relating to asbestos medical and scientific issues.

B.23. Did defendant or its agents or employees ever make any effort to keep abreast of medical literature concerning potential health hazards posed by the use of and/or exposure to asbestos? Indicate the names, addresses and job positions of all your company employees who reviewed this literature.

ANSWER: Yes. Various employees of Manville Corporation or related entities have reviewed the medical literature regarding asbestos health issues. Among these employees are the following:

Robert Anderson, M.D., M.P.H.
Manville Corporation
P.O. Box 5108
Denver, CO 80217

T. H. Davison, M.D.
2069 Deerfield Road
Deerfield, IL 60015

Hugh M. Jackson
5205 Sky Trail
Littleton, CO 80123

Paul Kotin, M.D.
4505 S. Yosemite, Unit 339
Denver, CO 80237

F. E. Marriner, M.D.
Mallard Crossing, Route 11
P.O. Box 290
Gainsville, GA 30501

William R. Paul, M.D.
2208 Highriver Court
Mississauga, Ontario
Canada L5H 3K4

William B. Reitze
10870 Park Ridge Road
Littleton, CO 80123

Clifford L. Sheckler
Deceased

Kenneth W. Smith, M.D.
Deceased

J. P. Syme
Deceased

J. P. Woodard
Deceased

In addition, various consultants reviewed the medical literature and advised Manville Corporation or related entities regarding asbestos related health matters. These consultants include:

Leonard Bristol, M.D.
Trudeau Institute
Saranac Lake, NY 12983

D. W. Cugell, M.D.
200 East Superior
Chicago, IL 60611

Edward A. Gaensler, M.D.
80 E. Concord Street
Boston, MA 02118

Dr. Leroy U. Gardner
Saranac Laboratory
P. O. Box 551, 7 Church St.
Saranac Lake, NY
(deceased)

Paul Kotin, M.D.
4505 S. Yosemite, Unit 339
Denver, CO 80237

Marvin Kuschner, M.D., Retired
Dean, School of Medicine
State University of New York
Stoneybrook, NY 11790

A. J. Lanza, M.D.
Deceased

Dr. Arthur J. Vorwald
Saranac Laboratory
P. O. Box 551, 7 Church St.
Saranac Lake, NY
(deceased)

Hans Weill, M.D.
Tulane Medical Center
1700 Perdido Street
New Orleans, LA 70012

George Wright, M.D.
3795 S. Hibiscus Way
Denver, CO 80237

See also answer to Interrogatory No. B.24.

B.24. Prior to 1964 had your company done any studies or tests or had your company participated in, been the subject of, or been aware of any studies or tests by others concerning the potential effects of inhalation of asbestos dust or fibers by one using or being exposed to asbestos or asbestos containing products. If so, state:

a. the date each study or test was conducted and the date defendant became aware of said study or test;

b. the names and addresses of the persons conducting each test or study;

c. the purpose of the study or test;

d. the results of each study or test;

e. if reduced to writing attach a copy hereto.

ANSWER: Beginning in 1928, Manville Corporation or related entities participated in animal research on the effects of asbestos at the Saranac Laboratory of the Trudeau Foundation in upstate New York. This research was indirectly funded by Manville Corporation or related entities in the form of premium payments and assessments to the Metropolitan Life Insurance Company, which was the immediate sponsor of the study. The amount of these contributions are unknown.

In early 1931, a report of this animal experiment was published by Dr. Leroy U. Gardner, the director of the project, in Vol. 13, No. 3 of the Journal of Industrial Hygiene. This report

was entitled "Studies on Experimental Pneumonokoniosis. VI. Inhalation of Asbestos Dust: Its Effect Upon Primary Tuberculosis Infection."

In 1929, shortly after the Saranac animal research began, Manville Corporation or related entities, along with other companies, asked the Metropolitan Life Insurance Company to determine whether asbestos dust was an occupational hazard and, if so, the nature of the hazard and methods of control. Manville's contributions again were indirect and took the form of increased premiums and assessments of unknown amounts.

The Industrial Hygiene Division of the Department of Public Health of the McGill University Medical School in Montreal assisted Metropolitan Life in this research. The results were published in 1935 in the Public Health Reports, Vol. 50, No. 1, issued by the U.S. Public Health Service. The title of the article was "Effects of the Inhalation of Asbestos Dust on the Lungs of Asbestos Workers" by A. J. Lanza, et al.

As a result of some of this early research, the Saranac Laboratory undertook additional research on the health effects of prolonged excessive inhalation of asbestos fiber. The Quebec Asbestos Mining Association ("QAMA"), of which Manville Corporation was a member, contributed to this new research. A report on this research was delivered at the Seventh Saranac Symposium in 1952 and was entitled "Pulmonary Function Studies in Men Exposed for Ten or More Years to Inhalation of Asbestos Fibers" by Fernand Gregoire and George W. Wright.

As a result of industry sponsored research, the Saranac Laboratory also published an article entitled "Experimental Studies of Asbestosis," by Arthur J. Vorwald, Thomas M. Durkin and Philip C. Pratt, Archives of Industrial Hygiene and Occupational Medicine, January 1951, Vol. 3, Page 1.

In the early 1950s, the Saranac Laboratory obtained funding from the QAMA for an animal research project to investigate the reported association between asbestos exposure and lung cancer. A report entitled "Asbestosis and Pulmonary Cancer" by Arthur J. Vorwald was released in 1952.

The QAMA also sponsored an epidemiological study of lung cancer among asbestos miners in the province of Quebec, Canada. The study was conducted by Daniel C. Braun and T. David Truan for the Industrial Hygiene Foundation of America, Pittsburgh, Pennsylvania. The study was entitled "An Epidemiological Study of Lung Cancer in Asbestos Miners," and appeared in the June 1958, Vol. 17 issue of the Archives of Industrial Health at Page 634.

The Industrial Hygiene Foundation of America conducted inter-tracheal injection experiments on test animals using asbestos fiber

taken from an asbestos mine owned by Manville Corporation or related entities. Manville contributed \$1,250 to this study, which was completed in 1968. This study is entitled "The Pulmonary Response to Coalinga Asbestos Dust: A Preliminary Investigation" by Paul Gross, et al.

Manville Corporation or related entities contributed personnel and data to a seven to ten year environmental, clinical and epidemiological study of workers exposed to asbestos which was conducted by the Division of Occupational Health of the United States Public Health Service. Reports relating to or based on such study include the following:

"Measurement of Asbestos Exposure" by Jeremiah R. Lynch and Howard E. Ayer, published in the Journal of Occupational Medicine, (January 1968);

"Research on Health Effects of Asbestos" by Lewis J. Cralley, et al., published in the Journal of Occupational Medicine, (January 1968);

"The Role of Trace Metals on Chemical Carcinogenesis-Asbestos Cancers" by J. R. Dixon, et al., unpublished, but presented at the International Congress of Occupational Health, Tokyo, Japan, (September 1969);

"Identification and Control of Asbestos Exposures" by Lewis J. Cralley, unpublished, but presented at the International Congress on Occupational Health, Tokyo, Japan (September 1969);

"Techniques for the Detection, Identification and Analysis of Fibers" by Robert C. Keenan and Jeremiah R. Lynch, published in the American Industrial Hygiene Association Journal, (September-October 1970).

"Fibrous and Mineral Content of Cosmetic Talcum Products" by Lewis J. Cralley, et al., published in the American Industrial Hygiene Association Journal, (July-August 1968).

Manville Corporation or related entities contributed \$142,400 to a study conducted by the Mt. Sinai School of Medicine, City University of New York, entitled "Biological Effects of Modified Inorganic Fibrous Microparticles." This study commenced November, 1969 and was completed in October, 1970. The purpose of the study was to: 1) explore the development of new biological test systems for fibrous materials; and 2) determine the effect on biological activity of asbestos fiber which had been coated with various physical or chemical substances.

Manville Corporation or related entities contributed \$25,000 on related research, which resulted in the publication of a report

entitled "Asbestos Hemolysis" by R. J. Schnitzer and F. L. Pundsack, Environmental Research, January 1970.

Manville Corporation or related entities contributed \$70,000 to the Industrial Hygiene Foundation of America's "Fibrous Dust Study." The purpose of this program was to investigate factors involved in the pathogenicity of major varieties of asbestos fiber to determine the nature of ferruginous bodies. Reports related to or based on this study include the following:

"Proceedings of the Fibrous Dust Seminar" of the Industrial Hygiene Foundation of America, published in its Medical Series Bulletin No. 16-70, (November 22, 1968);

"Experimental Asbestosis: The Development of Lung Cancer in Rats with Pulmonary Deposits of Chrysotile Asbestos Dust" by Dr. Paul Gross, et al., published in the Archives of Environmental Health, Vol. 16 (September 1967);

"The Pulmonary Response to Fibrous Dusts of Diverse Compositions" by Dr. Paul Gross, et al., published in the American Industrial Hygiene Association Journal, Vol. 31 (March-April 1970);

"'Ferruginous Bodies' in Guinea Pigs" by John M. G. Davis, et al., published in the Archives of Pathology, Vol. 89 (April 1970);

"Pulmonary Ferruginous Bodies" by Dr. Paul Gross, et al., published in the Archives of Pathology, Vol. 85 (May 1968);

"Pulmonary Ferruginous Bodies in City Dwellers, A Study of Their Central Fiber" by Dr. Paul Gross, et al., published in the Archives of Environmental Health, Vol. 19 (August 1969);

"Ferruginous Bodies in Human Lungs" by Michael D. Utidjian, et al., published in the Archives of Environmental Health, Vol. 17 (September 1968);

"Asbestos Bioeffects Research for Industry" by the Industrial Hygiene Foundation of America, Inc., published in its Medical Series, Bulletin No. 11, (1966).

QAMA contributed \$200,000 for a study of the health effects of asbestos exposure on workers in the asbestos cement manufacturing industry in the New Orleans area. Manville Corporation or related entities furnished approximately \$142,000 of the \$200,000. In addition, Manville contributed the time of its personnel. This study began in 1969 and concentrated on the health status of present and former employees in Manville and National Gypsum Company plants in and around New Orleans. Reports of this study include the following:

"Asbestosis in Asbestos Cement Workers" by Philip E. Enterline and Hans Weill, presented at LYON Conference, (October 1972);

"Radiographic and Physiologic Patterns Among Workers Engaged in Manufacture of Asbestos Cement Product, A Preliminary Report" by Hans Weill, et al., published in the Journal of Occupational Medicine, Vol. 15 (March 1973);

"Lung Function Consequences of Dust Exposure in Asbestos Cement Manufacturing Plants" by Hans Weill, et al., published in Archives of Environmental Health, Vol. 30 (February 1975);

"Influence of Dose and Fiber Type on Respiratory Malignancy Risk in Asbestos Cement Manufacturing" by Hans Weill, et al., published in American Review of Respiratory Disease, Vol. 120 (1979);

"Lung Cancer Risk Associated with Manufacture of Asbestos-Cement Products" by J. Hughes and H. Weill, published in Biological Effects of Mineral Fibers, Vol. 2, International Agency for Research on Cancer Scientific Publications No. 30, Lyon (1980);

"Immunologic Aberrations in Asbestos Cement Workers: Dissociation from Asbestosis" by R. D. deShazo, et al., published in the Journal of Allergy and Clinical Immunology, Vol. 72, (November 1983);

"Mortality of Workers Employed in Two Asbestos Cement Manufacturing Plants" by Janet M. Hughes, et al., published in the British Journal of Industrial Medicine, Vol. 44 (1987).

The Institute of Occupational and Environmental Health of QAMA conducted a study to compare the health status of an asbestos-exposed population to a non-exposed population in Canada. This study was conducted under the direction of Dr. J. C. McDonald, McGill University, Montreal, Canada. Reports generated by this study include the following:

"Qualitative Aspects of Dust Exposure in the Quebec Asbestos Mining and Milling Industry" by G. W. Gibbs, presented at the Third International Symposium on Inhaled Particles, British Occupational Hygiene Society, London (September 1970);

"Epidemiology of Primary Malignant Mesothelial tumors in Canada" by A. D. McDonald, et al., published in CANCER, Vol. 26, No. 4 (October 1970);

"Recent Developments in Asbestosis," by Dr. Premysl V. Pelnar, published in Studia Laboris et Salutis, (1970);

"Mortality from Lung Cancer and Other Causes in the Chrysotile Asbestos Mines and Mills of Quebec" by Dr. J. Corbett McDonald, et al., published in the Archives of Environmental Health, Vol. 22 (June 1971);

"Respiratory Symptoms in Chrysotile Asbestos Mine and Mill Workers of Quebec" by Dr. J. Corbett McDonald, et al., published in the Archives of Environmental Health, Vol. 24 (May 1972);

"Lung Function in Chrysotile Asbestos Mine and Mill Workers of Quebec" by Dr. Margaret R. Becklake, et al., published in the Archives of Environmental Health, Vol. 24 (June 1972);

"The Health of Chrysotile Asbestos Mine and Mill Workers of Quebec" by Dr. J. Corbett McDonald, et al., published in the Archives of Environmental Health, Vol. 28 (February 1974);

"Radiological Changes Over Twenty Years in Relation to Chrysotile Exposure in Quebec" by Douglas Liddell et al., and published in Inhaled Particles and Vapours: IV, (1977);

"Radiological Findings as Predictors of Mortality in Quebec Asbestos Workers" by F. D. K. Liddell and J. C. McDonald published in the British Journal of Industrial Medicine, Vol. 37 (1980);

"Follow-Up Respiratory Measurements in Quebec Chrysotile Asbestos Miners and Millers" by Dr. Margaret R. Becklake, et al., published in the Scandinavian Journal of Work, Environment and Health 8, Supplement 1 (1982);

"Fibre Exposure and Mortality from Pneumoconiosis, Respiratory and Abdominal Malignancies in Chrysotile Production in Quebec, 1926-75" by F. D. K. Liddell, et al., published in the Annals of the Academy of Medicine of Singapore, Vol. 13, 2nd Supplement (1984).

Manville Corporation or related entities also sponsored certain studies by Dr. Kenneth W. Smith, a full-time Manville employee. Reports of Dr. Smith's studies are as follows:

"Asbestosis" printed in The Pneumoconioses, by Kenneth W. Smith (approximately 1963);

"Pulmonary Disability in Asbestos Workers" by Kenneth W. Smith printed in the A.M.A. Archives of Industrial Health, Vol. 12 (August 1955);

"Trends in the Health of the Asbestos Worker" by Kenneth W. Smith, published in the Annals of New York Academy of Sciences, Vol. 132, Article 1 (December 1965).

In January, 1977, Manville Corporation or related entities contributed \$250,000 to the Mount Sinai School of Medicine to fund a mesothelioma treatment study and program. This was a cooperative effort by Manville and the International Association of Heat & Frost Insulators and Asbestos Workers Union, which also contributed \$250,000. The director of the Program was Irving J. Selikoff, M.D.

Manville Corporation or related entities released a report on August 2, 1982, which set forth the findings of a study performed for Manville by Epidemiology Resources, Inc. This report, entitled "Projections of Asbestos-Related Disease 1980-2009" attempted to project the incidence of asbestos-related disease over the next three decades.

On information and belief, the Fund states that Manville Corporation or related entities continue to monitor current workers and retirees who have previously worked with asbestos, as a part of the overall surveillance program incorporated in MESHIMS (Manville's Environmental Safety and Health Information Management System).

Beginning in 1968, Manville Corporation or related entities also sponsored studies relating to possible risks associated with the installation or removal of asbestos containing thermal insulation products. In that year, Manville joined in the establishment of the Insulation Industry Hygiene Research Program, Mount Sinai School of Medicine. The purposes of this study were as follows:

- (1) to develop improved methods for minimizing inhalation by insulation workers of dust and fumes encountered in their work;
- (2) to disseminate knowledge of those improved methods of dust and fume control wherever they may be applied advantageously; and
- (3) to offer cooperation, advice and assistance toward universal adoption of these methods.

The Program Director was Irving J. Selikoff, M.D.

In 1969-1970, Thomas J. Weeks and Allen F. Burns conducted tests for the Insulation Industry Hygiene Research Program at Manville's Research and Engineering Center at Manville, New Jersey. The report on these tests was entitled "Performance of Dust Respirators against a Fibrous Dust," and was published in American Industrial Hygiene Association Journal, (May-June 1970).

In addition, in 1968, the Clinica del Lavoro, Milano, Italy, initiated an epidemiological study of the biological effects of

asbestos dust among the Port of Genoa and LaSpezia Arsenal insulation workers. This study was sponsored by the Institute of Occupational and Environmental Health, which was, in turn, funded by QAMA. Manville Corporation or related entities contributed to the funding of the Quebec Asbestos Mining Association. The report generated by this study was entitled "Research Project: Epidemiological Study on the Biological Effects of Asbestos Dust at the Balangero Mine and among the Port of Genoa and LaSpezia Arsenal Insulation Workers" by Enrico C. Vigliani (June 16, 1972), Report Clinica del Lavoro "Luigi Devoto."

Manville Corporation or related entities contributed to studies conducted by Dr. Clark Cooper and others at the University of California, Berkeley, through membership in the National Insulation Manufacturers Association. Reports generated by this research include the following:

"Industrial Hygiene for Insulation Workers" by J. Leroy Balzer, published in the Journal of Occupational Medicine, (January 1968);

"Environmental Exposures in the Insulation Trade" by J. Leroy Balzer, published in NICA Outlook, (April 1970);

"Evaluation and Control of Asbestos Exposures in the Insulating Trade" by Clark W. Cooper and J. Leroy Balzer, Second International Conference Biological Effects of Asbestos, Dresden (1968);

"Asbestos in Relation to the type of Fibre and Dose in the Insulation Industry" by W. Clark Cooper and J. Miedema, LYON Conference, (October 1972).

See also answers to Interrogatories No. B.36, B.37 and B.41.

B.25. Prior to 1964, did defendant's agents or employees conduct any experiments with laboratory animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, for each such experiment which was conducted, indicate who conducted it, state when it was conducted and describe the results of each such experiment.

ANSWER: See answer to Interrogatory No. B.24.

B.26. Since 1964 has your company done any studies or tests or has your company participated in, been the subject of, or been aware of any studies by others concerning the effects of inhalation of asbestos dust and fibers by one using or being exposed to asbestos or asbestos containing products? If so, state the following:

a. the date each such study or test was conducted and the date defendant became aware of said study or test;

b. the names and addresses of persons conducting the tests or studies;

c. the purpose of the tests;

d. the results of each test or study;

e. attach a copy of any reports based upon each study or test.

ANSWER: See answer to Interrogatory No. B.24.

B.27. Since 1964, has defendant or its agents or employees sponsored or performed any laboratory experiments with animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, state who conducted each study, indicate where each study was conducted, and describe what the results of each test were.

ANSWER: See answer to Interrogatory No. B.24.

B.28. Prior to 1964, did defendant or its agents or employees ever go out to construction sites, factories or power houses where its asbestos or asbestos containing products were being used to determine or measure the levels of asbestos dust or fibers in the work environment? If so, for each such study or experiment that was conducted, set forth the following information:

a. when and where each measurement, study or test was conducted;

b. who conducted each measurement, study or test;

c. what types of equipment were utilized to measure the levels of asbestos dust or fibers in the air;

d. what the results of each measurement, test or study were;

e. attach a copy of any reports concerning the measurements, tests or studies.

ANSWER: To the best of Defendant's current knowledge, Manville Corporation or related entities did not conduct such studies at facilities owned or controlled by other companies.

B.29. Since 1964, has defendant and/or its agents or employees ever gone out to any construction sites, factories or power houses where its asbestos or asbestos containing products

were being used to determine the levels of asbestos dust or fibers which were in the work environment? If so, for each such study or experiment which was conducted, set forth the following information:

- a. who conducted each measurement, study or test;
- b. when and where each measurement, study or test was conducted;
- c. what type of equipment was utilized to measure the levels of asbestos in the working environment;
- d. what the results of each study, measurement or test were;
- e. attach a copy of any report concerning each measurement, study or test.

ANSWER: Beginning in 1970, Manville Corporation or related entities took field tests of airborne concentrations of asbestos at their own contract unit job sites. These reports are contained within the industrial hygiene records of the company. Copies will be produced at the document repository maintained by the Fund in Denver, Colorado at a time convenient to the parties.

In addition, measurements of airborne dust were made in connection with certain research efforts funded in whole or in part by Manville Corporation or related entities. See answer to Interrogatory No. B.24.

B.30. Give a complete description of all programs implemented and precautions taken by the defendant at its plants and facilities where it manufactures asbestos or asbestos containing products to reduce the levels of asbestos dust and fibers in the air. Include in this description all programs implemented and precautions taken since each plant was in operation. Include in this answer the date that each precaution was taken or procedure was implemented.

ANSWER: Manville Corporation or related entities responded in a number of ways to various developments with respect to increasing knowledge of health hazards associated with asbestos exposure. These responses included, but were not limited to: 1) the funding of additional research; 2) changes in operating systems within facilities or contract units controlled by Manville Corporation or related entities; 3) the reduction and eventual elimination of asbestos in products manufactured by Manville Corporation or related entities; 4) the promulgation or revision of booklets containing information regarding asbestos health issues; 5) the adoption and modification of warning labels; 6) revision of employee training and education programs; 7)

modifications of medical programs offered for employees; 8) modifications of industrial hygiene programs; 9) changes in dust control equipment; 10) changes in job methods or practices; 11) implementation of safer work practices and use of personal protective equipment such as respirators; and 12) modification of product literature.

Many or all of these practices have been in effect in Manville plants which manufacture asbestos containing products since the early 1930s. The practices, procedures and technology have changed substantially with the passage of time, in accordance with developing knowledge in the fields of industrial hygiene and occupational medicine.

B.31. Did defendant at any time require its employees who worked in the manufacture of asbestos or asbestos containing products to wear respirators, face masks or other protective devices? If so, set forth which employee (by type) was required to wear such protective devices, when the directive to same was issued for each type of employee and specify what type of device was to be worn by each type of employee.

ANSWER: Respirators have been made available to employees at Manville asbestos using facilities since the early 1930s. The respirators used were those approved by the U.S. Bureau of Mines for pneumoconiosis producing dusts. Companies with grants from the U.S. Bureau of Mines for approval of manufacturing respiratory protective devices are listed below:

1941

Acme Protection Equipment Company, Pittsburg, PA
American Optical Company, Southbridge, MA
American-LaFrance & Foamite Industries, Inc., Elmira, NY
B. F. McDonald Company, Los Angeles, CA
Chicago Eye Shield Company, Chicago, IL
Davis Emergency Equipment Company, New York, NY
DeVilbiss Company, Toledo, OH
Draegerwerk, Labeck, Germany
E. D. Ballard Company, San Francisco, CA
H. S. Cover, South Bend, IN
Hygeia Respirator Company, New York, NY
Mine Safety Appliances Company, Pittsburg, PA
Pangborn Corporation, Hagerstown, MD
Pulpsen Safety Equipment Corporation, Brooklyn, NY
Siebe, Gorman & Company, Limited, London, England
Standard Safety Equipment Company, Chicago, IL
W. W. Gly Manufacturing Company, Cleveland, OH
Willson Products, Inc., Reading, PA

1949

American Optical Company, Southbridge, MA
Binks Manufacturing Company, Chicago, IL
E. D. Bullard Company, San Francisco, CA
Metallizing Engineering Company, Inc., Long Island City, NY
Mine Safety Appliances Company, Pittsburgh, PA
Pulmosan Safety Equipment Corporation, Brooklyn, NY
Willson Products, Inc., Reading, PA

1950

Acme Protection Equipment Company, Chicago, IL
American Optical Company, Southbridge, MA
American-LaFrance & Foamite Industries, Inc., Elmira, NY
B. F. McDonald Company, Los Angeles, CA
Binks Manufacturing Company, Chicago, IL
Chicago Eye Shield Company, Chicago, IL
Davis Emergency Equipment Company, Inc., Newark, NJ
Davis Emergency Equipment Company, Inc., Newark, NJ
DeVilbiss Company, Toledo, OH
Draegerwerk, Lubeck, Germany
E. D. Bullard Company, San Francisco, CA
H. S. Cover, South Bend, IN
Hygeia Filtering Corporation (formerly Hygeia Respirator Company),
NY
Metallizing Engineering Company, Inc., Long Island City, NY
Mine Safety Appliances Company, Pittsburgh, PA
Pangborn Corporation, Hagerstown, MD
Pulmosan Safety Equipment Corporation, Brooklyn, NY
Scott Aviation Corporation, Lancaster, NY
Siebe, Gorman & Company, Limited, London, England
Standard Safety Equipment Company, Chicago, IL
W. W. Sly Manufacturing Company, Cleveland, OH
Willson Products, Inc., Reading, PA

1958

Acme Protection Equipment Company, South Huron, MI
American Optical Company, Southbridge, MA
American-LaFrance Corporation, Elmira, NY
B. F. McDonald Company, Los Angeles, CA
Binks Manufacturing Company, Chicago, IL
Chicago Eye Shield Company, Chicago, IL
Davis Emergency Equipment Company, Inc., Newark, NJ
Draegerwerk, Lubeck, Germany
E. D. Ballard Company, CA
H. S. Cover, South Bend, IN
Metallizing Engineering Company, Inc., Westbury, NY
Mine Safety Appliances Company, Pittsburgh, PA
Mine Safety Appliances Company, Limited, Glasgow, Scotland
Pangborn Corporation, Hagerstown, MD

Pulmosan Safety Equipment Corporation, Brooklyn, NY
Scott Aviation Corporation, Lancaster, NY
Siebe, Gorman & Company, Limited, London, England
Standard Safety Equipment Company, Chicago, IL
W. W. Sly Manufacturing Company, Cleveland, OH
Welsh Manufacturing Company, Providence, RI
Willson Products Division, Ray-O-Vac Company, Reading, PA

1965

Acme Protection Equipment Company, South Haven, MI
American Optical Company, Southbridge, MA
Binks Manufacturing Company, Chicago, IL
Cesco Safety Products, Inc., (formerly Chicago Eye Shield Company)
Chicago, IL
Davis Emergency Equipment Company, Inc., Newark, NJ
DeVilbiss Company, Toledo, OH
E. D. Bullard Company, Sausalito, CA
Firewel Company, Inc. (subsidiary of The Aro Corporation)
Buffalo, NY
Fry-Fyter Company, Dayton, OH
Glendale Optical Company, Woodbury, NY
Globe Safety Products, Inc., (formerly Globe Industries, Inc.)
Dayton, OH
H. S. Cover, South Bend, IN
Metallizing Engineering Company, Inc., Westbury, NY
Mine Safety Appliances Company, Glasgow, Scotland
Mine Safety Appliances Company, Pittsburgh, PA
Pangborn Corporation, Hagerstown, MD
Pulmosan Safety Equipment Corporation, Brooklyn, NY
Rite Hardware Manufacturing Corporation, Glendale, CA
Safeline Products, Putnam, CT
Scott Aviation Corporation, Lancaster, NY
Scott Air-Pak, Limited, Clarkson, Ontario, Canada
U. S. Divers Company, Santa Ana, CA
W. W. Sly Manufacturing Company, Cleveland, OH
Welsh Manufacturing Company, Providence, RI
Willson Products Division, The Electric Storage Battery Company
(formerly Willson Products Division, Ray-O-Vac Company and
Willson Products, Inc.), Reading, PA

Many of the approved respirators which were used at Manville facilities were manufactured by American Optical Company, Mine Safety Appliances Company, Minnesota Mining and Manufacturing, Scott Aviation, Welsh Manufacturing Company, and Willson Safety Products. The specific models which were approved for use varied over the years, as newer, more sophisticated models became available.

Respirator usage was mandatory when the dust exposures at a particular work station were above the recommended threshold limit value for exposure to asbestos. However, generally, no

disciplinary action was taken if an employee refused to wear a respirator.

After the advent of OSHA regulations for asbestos using operations, the specific requirements for respirator usage were established by law. The enforcement scheme included oral and written warnings, suspensions and dismissals.

Documents relating to respirator types will be produced at the records repository maintained by the Fund in Denver, Colorado at a time convenient to the parties. See answer to Interrogatory No. B.39.

B.32. Give a complete explanation of why each and every employee set forth in the preceding answer was required to wear a respirator, face mask or other protective device while working with asbestos.

ANSWER: Employees were provided respirators in order to provide them with protection against inhalation of excessive quantities of airborne dust.

B.33. Has any worker employed by your company, its subsidiaries or affiliates ever filed a workers' compensation claim against defendant or its predecessors, affiliates or subsidiaries for an occupational disease or condition which was allegedly caused by exposure to asbestos, asbestos products, asbestos dust or fibers? If so, set forth:

- a. the date each claim was made;
- b. where each claim was made;
- c. the name and address of the party making the claim;
- d. the name and address of the party against whom the claim was made.

ANSWER: Yes. Many of the workers' compensation records of Manville Corporation or related entities for asbestos related disease claims are kept at the document repository maintained by the Fund in Denver, Colorado. Copies of non-privileged documents in these records will be made available for inspection and copying at the document repository maintained by the Fund in Denver, Colorado at a time convenient to the parties. On information and belief, other responsive documents may be in possession of Manville Corporation.

B.34. If any employee or officer of defendant has testified at trial or by deposition in any litigation involving an alleged occupational exposure to asbestos, state:

- a. name, address and title of each such person who testified;
- b. date, location and form of testimony;
- c. whether defendant has a copy of such testimony;

ANSWER: Copies of all transcripts of testimony by current or former Manville Corporation employees relating to the asbestos litigation are maintained at the document repository maintained by the Fund in Denver, Colorado. These transcripts will be produced at the document repository maintained by the Fund in Denver, Colorado at a time convenient to the parties.

B.35. Has defendant at any time since its inception, maintained any office or department dealing with medical research? If so, state:

- a. the name of each such department;
- b. the dates each such department was in operation;
- c. the name, address and job position of each such person who has been in charge of said department or departments.

ANSWER: Generally, medical research was coordinated by the Employee Relations or Industrial Relations department of Manville Corporation. After 1974, these activities were coordinated by the Health, Safety and Environment department. See answer to Interrogatory No. B.24.

B.36. When was the first time the defendant became aware of or knowledgeable of any disease or illness associated with or causally related to the inhalation of asbestos, asbestos fibers or asbestos dust in any form whatsoever? Indicate which disease defendant became aware of and describe how defendant became aware of its alleged relationship to inhalation or exposure to asbestos.

ANSWER: Manville Corporation or related entities became aware of the confirmation of a relationship between asbestos exposure and the disease known as asbestosis in workers involved in mining, milling and manufacturing operations in the early 1930s. This knowledge was acquired from published medical literature which discussed the relationship between asbestos exposure and asbestosis among workers involved in asbestos mining and milling and certain asbestos manufacturing operations, and as a result of claims filed by Manville's employees in 1929 and the early 1930s alleging injury due to exposure to excessive quantities of asbestos.

Manville Corporation or related entities first learned of a possible relationship between asbestos exposure and mesothelioma in approximately 1960, when Dr. Wagner of South Africa published

an article on this topic. Manville or related entities received a workers' compensation claim which alleged mesothelioma in 1962.

Representatives of Manville Corporation or related entities first began to discuss a possible relationship between asbestos exposure and lung cancer in approximately 1943. However, for a number of years, there was no certain confirmation of a causal relationship. In 1955, Dr. Doll of Great Britain published an article on this topic, based on his epidemiological study of asbestos factory workers. Dr. Doll concluded that there was an increased incidence of lung cancer among those occupationally exposed to asbestos. Subsequent research has shown that lung cancer in those occupationally exposed to asbestos occurs primarily, if not exclusively, in persons who also use tobacco products.

B.37. In reference to the preceding interrogatory, if defendant acknowledges a causal relationship between asbestos and disease or illness, set forth the following information:

a. what diseases or illnesses defendant acknowledges are causally related to or associated with exposure to asbestos dust or fibers;

b. the date upon which defendant became aware of the association with or causal relation to each such disease or illness;

c. the date upon which defendant confirmed the causal relation of each such disease to exposure to asbestos dust or fibers;

d. how defendant became aware of each such causal relationship or association, indicating the source of all such information.

ANSWER: Defendant objects to this Interrogatory on the grounds that questions of existence or non-existence of a causal relationship between asbestos exposure and disease call for a conclusion in the form of an expert opinion by a person in the medical field. Without waiving its objection and, in an effort to be responsive, see answer to Interrogatory No. B.36.

B.38. If your company manufactured any products which contained asbestos and which were commonly used by insulation workers and pipe coverers, describe how the following products were cut, shaped, mixed and applied when used:

a. asbestos cement;

b. asbestos containing pipe covering;

- c. asbestos sheeting;
- d. asbestos insulation to cover extremes of heat as well as cold.

ANSWER: Asbestos containing cements were loose materials which were mixed with water by hand or by hoe or trowel. They were applied in plastic form with a trowel and allowed to dry.

Asbestos containing pipe coverings were, in some instances, shaped or cut with a knife, hand saw or table saw. (On the average job, less than ten percent (10%) of the total pipe insulation was cut.) The pipe covering was then tied in place with wires or bonds.

Asbestos containing block insulation was used on flat surfaces which were first covered with cement. Wire or expandable metal lathes were then placed on top of the cement to grip the block insulation, which was placed on top of the wire or lathes. The block insulation was, in some cases, cut by drill or saw to smoothly finish and fit the area.

Asbestos sheeting was usually applied to framing with nails or screws. It was sometimes necessary to cut these board products with a hand or table saw.

Asbestos containing paper, tape, felt and cloth was used for insulation in unique applications. It was sometimes necessary to tear these materials or to cut them with a knife or scissors to fit the appropriate area.

Asbestos containing gaskets or packings were placed between joints of mechanical equipment to prevent leakage. Thus, gaskets were furnished in a large number of pre-cut styles and shapes. In some circumstances, it may have been necessary for an installer to fabricate or shape the gasket on the job site.

B.39. Prior to 1964, were there any memoranda written by, distributed, or circulated among defendant's employees, agents or representatives concerning the potential health hazards concerned with asbestos containing products? If so, state:

- a. dates of each memorandum;
- b. name, address and job position of each individual who wrote each memorandum;
- c. name and address and job position of each individual to whom the memorandum was directed;
- d. where each memorandum is kept;

e. attach copies of each memorandum hereto.

ANSWER: Yes. Copies of all responsive non-privileged documents will be produced at the document repository maintained by the Fund in Denver, Colorado at a time convenient to the parties. See answer to Interrogatory No. B.21.

In addition to the documents which will be specifically identified and produced at that time, there may be additional documents responsive to this Interrogatory among the general collection of documents in the repository. This collection of documents will be made available to Plaintiff for review at a time agreed upon by the parties.

All non-privileged documents in the possession, custody and control of the Fund which were obtained from Manville Corporation and which relate to asbestos are located in a records repository in Denver, Colorado. The Fund assumed the management and operation of this repository on November 28, 1988, the date on which the Manville Corporation bankruptcy plan was consummated.

The repository was originally set up and managed by Manville Corporation to house the documents which Manville retrieved and produced in previous asbestos litigation. In 1983, pursuant to an order entered by Judge Ira Brown of the Superior Court in the City and County of San Francisco, Manville Corporation was required to produce all non-privileged documents relevant to the coverage litigation which Manville Corporation had commenced against its insurance carriers. That litigation was brought to establish Manville Corporation's right to defense and indemnification for costs incurred in connection with the asbestos litigation. The insurance litigation was ultimately settled for sums in excess of \$800 million.

In order to comply with Judge Brown's order, Manville Corporation hired numerous paralegals and law clerks and undertook a massive and comprehensive review of the corporate records of the company which existed at various Manville facilities world wide. Manville spent literally millions of dollars to gather and maintain this collection of documents.

Similarly, beginning in 1985, Manville Corporation was required to produce the vast majority of these same documents to representatives of the United States Department of Justice, in connection with Manville's actions against the United States. In those cases, Manville Corporation was claiming a right to indemnification or contribution for expenses incurred in the defense of asbestos health cases brought by workers employed in government owned or controlled shipyards.

These documents are currently kept at the document repository referred to above. The repository is now maintained and operated by the Fund.

Manville Trust Document Categories

The repository contains 19,317 boxes and 968 rolls of microfilm, housed in two separate warehouses. The larger of the two warehouses contains 15,293 boxes. The smaller warehouse contains 4,024 boxes and the microfilm collection. These documents are grouped in nine categories:

- 01: Manville plant collection - 10,383 boxes
- 02: Waukegan plant collection - 4,908 boxes
- 03: Lompoc plant collection - 149 boxes
- 04: World Headquarters (WHQ) collection - 3,417 boxes
- 05: Microfilm from Manville WHQ - 492 rolls
- 06: Microfilm from Manville WHQ - 361 rolls
- 07: Documents sent by Local Counsel - 385 boxes
- 08: Microfilm with Redacted Documents - 115 rolls
- 09: Documents produced in January, 1989 - 73 boxes

The Manville Plant collection (01) includes documents from the Manville, NJ plant; the Nashua, NH plant; the Billerica, MA plant; the Savannah, GA plant; the Laurinburg, NC plant; and the Fort Worth, TX plant. It also includes documents sent to the plant for storage from Manville General Headquarters prior to the early 1970s, when the Headquarters offices were located in New York. In addition, this collection includes documents from plants in the eastern United States which were closed prior to the 1980s.

The Waukegan Plant collection (02) includes documents from the Waukegan, IL plant and the Oak Brook, IL office.

The World Headquarters (WHQ) collection (04) includes documents which were obtained from a number of locations, including: the Denison, TX plant; the Franklin, PA plant; the Green Cove Springs, FL plant; the Jeffrey Mine in Asbestos, Quebec, Canada; the Long Beach, CA plant; the Lompoc, CA plant; the Marrero, LA plant; the Manville offices in Montreal, Quebec, Canada; the Pompano Beach, FL plant; the Pittsburg, CA plant; the Stockton, CA plant; and the Waukegan, IL plant.

The WHQ collection also includes documents obtained from the files maintained at the World Headquarters, including: the Asbestos Fiber Division; the Audio-Visual Department; Manville Contract Units; the Corporate Information Center; the Corporate Relations Department; the Engineering Department; the Executive offices; the Fiberglass Division; the Filtration and Minerals Division; the Finance Department; the Health, Safety, and Environment offices; the Holophane Division; the Industrial Products Division; the Labor Relations offices; the Legal Department; the Patent and Licensing

offices; the Research and Development offices; Sales Offices; and Worker's Compensation records.

Finally, the WHQ collection includes: asbestos health claims filed against Manville; bankruptcy related materials; documents from the historical records kept at Manville headquarters ("B-Level"); insurance loss runs and policies; local counsel files; legal department files; and miscellaneous asbestos-related documents.

The Microfilm collections (05), (06) also contain documents which were located at World Headquarters. Generally, the same types of documents from the same departments and offices are included. However, at the time of the production in the insurance litigation, these documents were produced on film, usually because the documents were in active files which needed to be maintained for normal operations of the company. Records from the following collections were included in these microfilm collections: patents and licensing department; the Research and Development offices; the Lompoc plant; the Health, Safety, and Environment offices; and the records from the Englewood Cliffs, NJ sales offices; insurance department files; insurance policies; industrial hygiene surveys; administrative bulletins; asbestos medical articles; asbestos health depositions; asbestos health files; Manville Corporation general ledgers from 1919 to 1952; and growth plans from 1971 to 1980. In addition, some document collections produced to insurance companies are also located on film in these collections.

The Local Counsel Boxes (07) collection includes documents from Heller, Ehrman, White & McAuliffe in California; Freeborn & Peters in Illinois; and Budd, Lerner, Kent, Gross, Picillo & Rosenbaum in New Jersey.

The Microfilm collection with the redacted documents (08) contains documents from many locations previously mentioned. However, privileged portions of the documents have been redacted, and the redacted copy was filmed, so that the documents could be produced.

The Boxes produced in January, 1989 (09) are documents which had originally been classified as privileged. All privileged documents were reviewed again in 1988 and 1989, and the documents in the 09 collection were determined to be producible.

Box Index

A Box Index for the repository is provided to reviewers. It took six paralegals three months to index the boxes. The microfilm took an additional three months to index. The finished indices were then spot-checked for accuracy by a supervising paralegal with five years experience in the asbestos litigation.

The form used to prepare the index was reviewed in advance by Selected Counsel for the Beneficiaries, a group of three plaintiff's attorneys appointed by the Trust's Board of Trustees to represent the Asbestos Litigation Group. Any changes suggested by these attorneys were incorporated into the form.

The index consists of twenty subject categories, twelve document types, and twelve time periods ranging from pre-1930 to post 1985, in five year increments. Each box and microfilm roll is indexed individually. A box may contain more than one type of document, subject area, or time period.

The Box Index allows reviewers to: 1) establish priorities for their searches; and 2) eliminate large numbers of boxes with irrelevant documents. For example, many boxes contain nothing but sales invoices or payroll records. A reviewer interested in documents relating to knowledge of asbestos health hazards would be able to eliminate those boxes from his or her search on the basis of the Box Index alone.

Reviewers may order a copy of the index so that they can identify the boxes which they wish to review prior to their arrival at the repository. Alternatively, the Fund will provide reviewers with a printout of all the information contained in the index. Finally, the Fund will conduct computer searches of the data base for reviewers who identify the categories in which they are interested.

Review Procedures

The repository is open to all parties to the asbestos litigation. An informational packet on the repository is provided to all parties who express an interest in the collection. It contains information regarding the hours of operation, rules regarding reviews, and procedures for scheduling visits to the repository. Generally speaking, the Fund has been able to accommodate the schedules of persons wishing to conduct a review, and access is often provided with less than one week's notice.

Defendant objects to this Interrogatory to the extent that it requires Defendant to search the entire document collection on the grounds that such a search may be performed as easily by any other party as by the Fund.

B.40. Has defendant or its predecessor corporations ever had a division, affiliate or subsidiary which was involved in contracting for or installation of asbestos-containing materials in New Jersey? If so, for each such entity involved in the contracting or installation of these products, set forth the following information:

a. name of each such entity and the nature of its relationship to the parent corporation;

b. the exclusive dates that each of the above mentioned entities were in existence;

ANSWER: To the best of Defendant's knowledge, Manville or related entities did not own a contract unit in New Jersey. H.W. Porter, also known as Porter-Hayden, did distribute Manville products in New Jersey in the 1970s. In addition, H.W. Porter installed Manville products in New Jersey on a contract basis in the 1950s and 1960s.

B.41. Did defendant ever provide any of the employees who worked in the contracting for or installation of asbestos containing materials with any respirators, face masks or protective clothing? If so, indicate what types of protective clothing, respirators or face masks were provided, describe when each type was first provided to each employee and describe why they were provided to each type of employee.

ANSWER: At least since 1962, Manville made respirators available at its contract units for general dust protection. Subsequent to the Selikoff studies in 1964, Manville required its insulation installers to use respirators approved by the Federal government. See answer to Interrogatory No. B.31.

B.42. Has any individual who was ever employed in the contracting and insulation business referred to above ever filed a claim for workers' compensation because of an alleged occupational disease sustained allegedly because of occupational exposure to asbestos? If so, for each such employee who has filed a claim set forth the following information:

a. name of each such employee;

b. when each claim was filed;

c. where each claim was filed;

d. name of the attorney who represented the petitioner and respondent.

ANSWER: To the best of the Fund's knowledge, the following are claims filed against the Manville Corporation or related entities prior to 1970 by users or installers of asbestos containing products.

Gustave J. Carlson (1935) asbestosis

Lewis M. Munger (5-18-54) asbestosis
Workmen's Compensation Award B-7297849 (MI)
(Hearing Held, 1959 - 1st reference to J-M)
Settled

Edward L. Campbell (1955) asbestosis
Workmen's Compensation N-24318 (CT)
Manville let out of case

Ervey McCarrell (11-30-56) asbestosis
Workmen's Compensation 56-LA-176684 (CA)
(Order Joined J-M 1959)
Settled

John E. Swartout (12-28-55) asbestosis
Workmen's Compensation 55-SF-169171 (CA)
(claim, J-M noticed 1956)
Settled

James W. Riley (7-15-57) asbestosis
Workmen's Compensation 57-LA-182835 (CA)
Settled

Harry Haake (1957) asbestosis
Workmen's Compensation N-34614 (CT)
Settled

Frederick LeGrande (7-17-57) asbestosis
U.S. District Court 741-57, District of New Jersey
Settled

John Yavonditte (1958) asbestosis

James Cavanaugh, Sr. (1959) asbestosis

Dean Templeton (7-8-60) asbestosis
Workmen's Compensation (MI)
Dismissed for Lack of Prosecution

Clifford Harding (1960) asbestosis

Harvey Curtis (11-21-60) pneumoconiosis
Workmen's Compensation B-9384208 (MI)
Settlement Award Against Owens-Corning Only

Harvey Curtis (9-18-67) asbestosis
Workmen's Compensation (MI)

Ernest F. Gately (1960) asbestosis
Workmen's Compensation

Raymond J. Collins (1961) bronchitis

Gladys Faciane (Clarence) (3-20-61)

Case #77,004, Division "C", 19th Judicial District Court
Parish of East Baton Rouge, Louisiana

Claude J. Tomplait (12-11-61)

Workmen's Compensation #W67299 (TX)

Settled

Claude J. Tomplait (12-23-66)

Civil #5402 U.S. District Court,
Eastern District of Texas, Beaumont Division
Settled

Anthony J. Onofrio (1962)

Workmen's Compensation (CT)

James Vogt (1962)

Workmen's Compensation

occupational disease

David Mulligan (1962)

Workmen's Compensation

Denied not total disability

asbestosis

Fred C. Wenham (2-23-61)

Case #125-61, 3rd Party, U.S. District Court,
New Jersey
Dismissed

William S. McKinney (1962)

Workmen's Compensation (OH)

asbestosis

Faida LaBonte (7-22-63)

Workmen's Compensation (NY)

asbestosis

Robert O. Goans (5-16-63)

Workmen's Compensation 63-OAK-11052 (CA)
Settlement

asbestosis

Willard R. Crader (12-17-64)

Workmen's Compensation 64-POM-1939 (CA)
Settlement

asbestosis

Paul J. Greischar (4-17-64)

(Order joining Manville 4-24-62)
Workmen's Compensation (CA)
Settled

asbestosis

Harry A. Buris (1964)

asbestosis

Ollie Rogers (6-23-64) asbestosis
Workmen's Compensation (CA)
Settled

Thomas W. Gregory 6-10-64, asbestosis
Workmen's Compensation (TX)

Bernard Wines (3-15-65)
Workmen's Compensation (MI)

Melvin Hunt (2-11-65) asbestosis
Workmen's Compensation 65-LB-29228 (CA)
Settled

Carl Bailey (11-15-65) asbestosis/lung cancer
Workmen's Compensation 65-LA-288822 (CA)
Settled

Henry Peutz (7-22-66) asbestosis
Workmen's Compensation 66-OAK-20668 (CA)
Settled

Kenneth M. Frederick (9-13-66) asbestosis/lung cancer
Workmen's Compensation 66-F-16482 (CA)
Settled

Dean Clark (2-15-66) lung cancer
Workmen's Compensation 66-LA-292043 (CA)
Settled

Lawrence J. Taylor (7-18-66) asbestosis
Workmen's Compensation (MI)

Vernon Lumbattis (2-11-66) asbestosis
Workmen's Compensation 66-LA-291957 (CA)
Settled

Donald F. Bradshaw (1-3-67) asbestosis
Civil #29433, U.S. District Court
Eastern District, Michigan Southern Division
Dismissed

Oscar L. Gilbert (4-19-67) lung injury
Workmen's Compensation 67-ANA-19219 (CA)
Settled

Robert Horsman (10-23-67) asbestosis
Workmen's Compensation 67-LA-316509 (CA)
Settled

<u>William McCormick</u> (11-17-67)	bronchitis
Workmen's Compensation 67-LA-317548 (CA)	
Settled	
<u>Joseph Noto, Jr.</u> (1967)	asbestosis
<u>John Tyler</u> (1967)	asbestosis
<u>Lawrence F. Brimmer</u> (1968)	dust disease
<u>Clyde Nicholson</u> (6-19-68)	lung fibrosis
Workmen's Compensation 68-ANA-23276 (CA)	
Settled	
<u>Frances Rogers</u> (1968)	asbestosis
<u>John G. Rauscher</u> (1969)	asbestosis
<u>Delmer Lee Austin</u> (1969)	asbestosis
<u>Clarence Borel</u> (10-20-69)	asbestosis
Claim #6449, U.S. District Court for	
Eastern District of Texas, Beaumont Division	
Jury Award	
<u>J. J. Crawford</u> (12-4-69)	asbestosis
Claim #6492, U.S. District Court,	
Eastern District of Texas, Beaumont Division	
<u>S. R. Potter</u> (1969)	asbestosis
Claim #6329, U.S. District Court,	
Eastern District of Texas, Beaumont Division	
Settled	

B.43. State the full name, job title and present residence, business and professional addresses of any and all persons who have knowledge of any relevant facts relating to this case and the defense of your company.

ANSWER: See answers to Interrogatory Nos. B.4., B.20., B.21, B.23 and B.34. The Fund may also rely on those persons named in the Interrogatory answers of other parties to this action, including but not limited to, all treating and examining physicians and custodians of records, as well as all persons named in deposition testimony or whose names appear in discovery materials.

B.44. State the name, address and credentials of each and every expert witness you intend to utilize at the time of trial, and annex hereto a copy of their report.

ANSWER: Defendant reserves the right to retain medical or other expert advice as counsel deem necessary and proper in light

of the discovery received. In addition, defendant reserves the right to rely upon the findings and opinions of any and all expert witnesses identified by the parties during discovery up to and including the time of trial.

B.45. Do you contend that the plaintiff's illness is a consequence of the negligence or the fault of a third party or anyone who is not a party to this action? If so, state the name and address of each such party and set forth all facts which support your contention.

ANSWER: Yes. Such parties include all codefendants to this action, plaintiff's employers, and other parties who may be revealed through continuing discovery up until the time of trial. The Fund will rely upon proofs presented by the plaintiff and other defendants, plaintiff's deposition testimony, and answers to interrogatories.

B.46. Do you contend that the illness and/or death of the decedent in this action was not causally related to an occupational exposure to asbestos dust and fibers? If so, give a full and detailed description of your contentions.

ANSWER: Yes. The Fund reserves the right to rely upon the findings and opinions of any and all expert witnesses, the testimony of fact witnesses, and any physical and documentary evidence identified by the parties during discovery up to and including the time of trial.

Defendant also reserves the right to retain medical or other expert advice as counsel deem necessary and proper in light of the discovery received.

B.47. Do you contend that other agents and/or substances caused the illness and/or death of the plaintiff in this matter? If so, identify each such agent and/or substance and set forth all facts to support your contentions.

ANSWER: Yes. The Fund reserves the right to rely upon the findings and opinions of any and all expert witnesses, the testimony of fact witnesses, and any physical and documentary evidence identified by the parties during discovery up to and including the time of trial.

Defendant also reserves the right to retain medical or other expert advice as counsel deem necessary and proper in light of the discovery received.

B.48. Has defendant and/or its agents or employees obtained any statements from anyone who has knowledge of the facts surrounding this cause of action? If so, set forth:

a. name, address and job position of the person that obtained the statement;

b. the name, address and job position of the person who gave the statement;

c. the date the statement was given;

d. whether the statement is in writing, and if so, who has custody of it.

ANSWER: No.

B.49. Does defendant contend that plaintiff or plaintiff's decedent suffered injuries and/or death due to his own negligence. If so, set forth all facts which support your contentions.

ANSWER: Yes. The Fund will rely upon the facts revealed in discovery to date.

B.50. Does defendant contend that plaintiff or plaintiff's decedent failed to use defendant's asbestos or asbestos containing products properly? If so, set forth all facts which support your contentions.

ANSWER: Unknown at this time.

ANSWERS TO PART C

C.1. Has defendant and/or its affiliates or subsidiaries purchased asbestos fiber for use in its business or for manufacturing its products? If so, set forth the following information:

a. the inclusive dates that your company purchased asbestos fiber;

b. the name and address of each and every entity that you purchased the asbestos fiber from;

c. the nature and types of products that your company used asbestos fiber for;

d. the type of asbestos fiber that your company purchased.

ANSWER: Manville or related entities used asbestos fiber obtained from a number of sources. For products which contained chrysotile, much of the fiber used was obtained from the Jeffrey Mine in Asbestos, Quebec, which was owned and operated by a Canadian subsidiary. Other sources of chrysotile included: Advocate Mines, Ltd.; Bell Asbestos Mines, Ltd.; Calaveras

Asbestos, Ltd.; Cassiar Asbestos Corporation, Ltd.; H.K. Porter Company; Marlime Chrysotile Asbestos Corporation, Ltd.; Metate Asbestos Corporation; and Pacific Asbestos Corporation.

Chrysotile and crocidolite fibers were imported, primarily from South Africa. The suppliers included: Antony Gibbs & Company, Ltd.; Asbestos Investment (Pty), Ltd.; John Beith (S.A.) Pty.; Ltd.; British Metal Corporation; Cape Blue Mines (Pty), Ltd.; Central Asbestos Company, Ltd.; C. J. Petro & Company; Colonial Sugar Refining Company, Ltd.; Egnep (Pty), Ltd.; Flintkote Building Products Group; General Mining & Finance Corporation, Ltd.; General Services Administration; Hooker Chemical Company; John Holt & Company; Kurman; Norca Corporation; North American Asbestos Corporation; Raw Asbestos Distributors; Rhodesian Asbestos, Ltd.; S.A. Asbestos Trading (Pty), Ltd.; V/O Soyuspromexport; Special Asbestos Company, Inc.; Turner & Newell, Ltd.; Turners Asbestos Fibres, Ltd.; and Watson, Geach & Company, Inc. See answer to Interrogatory No. B.39.

C.2. Does defendant have or has it had any plants, factories or production facilities located in the State of New Jersey which was or is engaged in the importation, manufacture, processing, converting, compounding, packaging, distribution, and/or sale of asbestos, asbestos containing products and/or asbestos containing insulation products? If so, for each such plant, factory or facility which is or has been located in New Jersey, set forth the following information:

a. the name and address of each such plant, factory or production facility;

b. the inclusive dates that each plant, factory or facility existed;

c. a complete and detailed description of all products that each plant, factory or production facility was engaged in producing (include in your description the type of product and its generic and trade name).

ANSWER: Manville Corporation or related entities operated a manufacturing facility located in Manville, New Jersey from 1913 through 1985. To the best of Defendant's knowledge, the following asbestos-containing products were among those manufactured at the Manville Plant:

0352 Cement
12 lb. Asbestos Tape
15A Asbestos Jacket
45A Asbestos Jacket
#50 Weatherproofing Felt
301 Cement
302 Cement

340 Cement
 364 Cement
 7700 Coated Asbestos Jacket
 85% Magnesia Block
 85% Magnesia Pipe Covering
 Aertite
 Albaseal
 Anti-Sweat
 Armature Asbestos Paper
 Asbestobord
 Asbestocel
 Asbestos Cloth
 Asbestos Fire Felt
 Asbestos Firetard
 Asbestos Jelly Rolls
 Asbestos Paper and Rollboard
 Asbestos Pipe Blanket
 Asbesto-Sponge (felted, sectional, molded)
 Asbestos Roll Fire Felt
 Asbestos Rope
 Asbestos Sheet
 Asbestos Tape
 Asbestos Textiles
 Asbestos Tubing
 Asbestos Turbine Blanket
 Asbestos Welding Paper
 Automotive Friction Materials
 Body Sealer
 Branchtite
 Ceilinite
 Colorsil
 Commercial Grade Asbestos Paper
 Corrugated Transite
 Corspan
 D.C. Flexstone
 Doublex Asbestos Paper
 Duplex Asbestos Paper
 Duxseal
 Engineers Insulating Tape
 Facespan
 Fibrofil Cement
 Fibroid Asbestos Paper
 Fil Insul Cement
 Fine Corrugated Asbestocel
 Flexboard
 Flexible Min-K
 H-Navaseal
 HF Navaseal
 High Strength Fibroid Asbestos Paper
 High Temperature Flexible Min-K Blankets
 Industrial Vent Caulking
 Insulkote ET

Insulkote SG
Insulkote ST
Laptite Cement
Long Fiber Asbestos Paper
Metal On
Microbestos Paper
Millboard 101
Millboard 102
Millboard 103
Millboard 104
Millboard 105
Millboard 106
Millboard 219
Millboard C
Millboard XXX
Min-K 500
Min-K 1301
Min-K 2000
Min-Klad
Molded Packings
MX-3803 Asbestos Filler
Navy 450 Cement
Niagrite
Nodrseal
Non-Burn Asbestos Paper
Pan-O-Cel
Plastiseal F
Silicated Thermobestos Block
Silicated Thermobestos Pipe Covering
Sonite
Standard Flexible Min-K Blankets
Stove Putty
Superex M Block
Superex 1900 Block
Superex Cement
Superex Cement for Navy
Superex M Pipe Covering
Super Fire Felt
Thermobestos Block
Thermobestos Pipe Covering
ThermoFire Felt
Thermomat
Thermotape
Thermowrap
Transhield Asbestos Felt
Transite Pipe
Transite Ridge Roll and Battens
Transoseal
Type T Nodrseal
Uniseal
Vitribestos
Vitro Fire Felt

Wet Strength Fibroid Asbestos Paper
White Surface Asbestos Jacket
Woven Asbestos Sheet Packing

Manville Corporation or related entities operated a manufacturing facility located in North Brunswick, New Jersey from 1947 through 1975. To the best of Defendant's knowledge, the following asbestos-containing product was among those manufactured at the North Brunswick Plant:

Spirotallic Gaskets

Manville Corporation or related entities also operated a manufacturing facility located in Patterson, New Jersey from 1970 to 1975. To the best of Defendant's knowledge, Die-Formed Rings and Gaskets were among those products manufactured at that location.

See also answer to Interrogatory No. C.9. for additional information regarding Asbestos Containing Thermal Insulation or Shipyard products.

C.3. Indicate which asbestos products and asbestos materials manufactured and distributed by the defendant are or were classified as "insulating materials".

ANSWER: Asbestos containing products which were considered by Manville Corporation to be thermal insulation materials are as follows: sectional pipe covering, block, cements, finishes, paper, felt and blankets.

C.4. With reference to the preceding question, give a full and complete description of the purposes for which defendant's insulating materials containing asbestos were designed.

ANSWER: These materials were designed to provide thermal insulation for machinery and piping in industrial environments and other environments requiring high temperature insulation products.

C.5. Set forth the name and address of each and every entity that your company purchased or received asbestos fiber from which was utilized in the manufacture of your company's asbestos containing insulation products. Include in your answer the inclusive dates that your company purchased asbestos from each such entity.

ANSWER: See answer to Interrogatory No. C.1.

C.6. As to any asbestos products or raw asbestos mined, converted, fabricated, produced, compounded, manufactured, processed, sold or distributed by defendant, state whether any was

shipped or sold to plaintiff's employer in New Jersey either directly or through a third party, stating which.

ANSWER: A diligent review of asbestos fiber sales records, from 1950 through 1982, and a review of asbestos-containing product sales records from 1972 to the present, indicates there were no sales to plaintiff's employer, National Lead Industries.

To the extent that sales records exist for either fiber or products, they would be contained among the records stored at the records repository maintained by the Trust in Denver, Colorado. For the most part, these invoices cover sales of Manville products since the late 1960s. However, the sales records even for this time period are not complete. Other sales records may have been destroyed pursuant to the ordinary record retention policies of Manville.

Based on a search performed on the Box Index data base described in response to Interrogatory No. B.39, there are a total of 5,648 boxes which contain only sales invoices or other records relating to sales of Manville products. The documents in these boxes are not organized, and in order to identify sales or particular products or sales to particular customers, it would be necessary to review each sales document.

Moreover, there are approximately additional 2,325 boxes which contain sales records as well as other documents potentially relevant to the asbestos litigation. However, these boxes would not need to be searched in their entirety by a reviewer interested only in sales records.

The burden of searching these records is no greater for another party to the litigation than it would be for the Fund, and consequently, the defendant elects to produce business records in lieu of response to a written interrogatory. In the event that the counsel elects to search these boxes, a printout of the relevant box numbers can be provided.

C.7. If the answer to C.6. is in the affirmative, state as to each asbestos product, or raw asbestos:

a. exactly what product(s) or type(s) of asbestos was (were) shipped or sold to plaintiff's employer;

b. the dates and quantities of each such product shipped or sold;

c. whether any warnings, cautions, caveats or directions accompanied the materials so shipped, the date these appeared and the exact wordings of the warnings, cautions, caveats or directions and where the warnings, cautions, caveats or directions appeared;

d. the name and address of any intermediate supplier or distributor who sold this defendant's products to plaintiff's employer during the period referred to above;

e. did your company affix its corporate logo or insignia on the packages of asbestos containing insulation products that it distributed and sold? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or log was utilized. Annex hereto a photograph or copy of each such logo described in this matter;

f. please describe in detail the type of packages in which defendant has sold, distributed or manufactured asbestos material, listing the dates each type of package was used, a physical description thereof and description of any printed material or trademark that appeared thereon.

ANSWER: See answer to Interrogatory Nos. B.19., C.6., C.9 and C.15.

Asbestos containing pipe covering and block were wrapped with kraft paper and sold in cardboard boxes. Asbestos cements were sold in multi-ply kraft paper bags and heavy duty, polyethylene bags. Asbestos yarns were wound on paper tubes and shipped in fiberboard cartons or wooden boxes. Asbestos cloth was rolled, wrapped in laminated kraft paper, and tied with tape or twine. The roll was then placed in burlap tubing. In later years, the burlap tubing was replaced by reinforced paper.

Asbestos tubing, depending on the specified size, was packaged on spools, wound on reels or cut to specified lengths, and placed in fiberboard cartons. Asbestos tape was rolled, bound with white twine, and placed in fiberboard cartons. Asbestos sheeting was rolled on tubes then wrapped in laminated kraft paper, tied with tape then placed in fiberboard cartons with paper lining between each roll. Larger sheets, which were individually wrapped in kraft paper, were placed in corrugated fiberboard cartons or placed in wooden crates.

Printing on the cartons or bags usually included the J-M logo, the name "Johns-Manville", the product name, the size and the weight. Additional language may have been used from time to time. Photographs and product literature are located at the document repository maintained by the Fund in Denver, Colorado, and will be produced at a time agreed upon by the parties.

C.8. Have any of the products listed in Interrogatory C.7. above been altered in chemical composition since being marketed? If so, set forth the following information:

- a. the date of each alteration;
- b. a detailed description of the nature of each alteration;
- c. the reason for such alteration.

ANSWER: The Fund is not aware of particular uses of Manville asbestos and asbestos containing products by plaintiff's employer that might have altered the chemical composition of the asbestos sold by Manville Corporation or related entities.

C.9. Have you discontinued manufacturing and/or distributing and/or supplying or selling any asbestos or asbestos products referred to in C.7.? If so, set forth the following information:

- a. what such product is;
- b. the reasons therefor;
- c. when the discontinuance took place.

If your answer to C.6. is either "No" or "unknown" but your answer to B.14. is "Yes" provide answers to C.10. through C.18. Otherwise you may proceed to C.19.

ANSWER: Yes. Manville Corporation or related entities discontinued the manufacture of most asbestos containing thermal insulation products in the 1972 to 1973 time period. See Exhibit A for dates of manufacture. These products were discontinued in part due to concerns about the health consequences of occupational exposure to asbestos. Manville Corporation or related entities developed asbestos free replacement products for many of the asbestos containing products which were manufactured previously. No asbestos containing products have been manufactured by Manville since 1985.

With respect to asbestos fiber, Manville Corporation sold its interests in asbestos mining and milling operations in 1983, and has not sold asbestos fiber since that date.

C.10. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.

ANSWER: See answer to Interrogatory No. C.9.

C.11. With reference to your answer to B.18. state the names and addresses of the entities to whom the products were sold.

ANSWER: See answer to Interrogatory No. B.3.

C.12. Did your company and/or its affiliates or subsidiaries do business with or utilize any distributors in the State of New Jersey for purposes of selling or installing its asbestos products? If so, identify each such entity, indicate and describe the nature of the business that you did with each such entity, and set forth the dates this business relationship existed.

ANSWER: The following organizations were New Jersey distributors of asbestos containing products manufactured by Manville or related entities: Seashore Supply Company; L & H Plumbing & Heating; Porter-Hayden Company; S. Franklin & Sons; Medford Plumbing Supply; Fiber Flex, Inc.; York Sheet Metal; Ridgewood Corporation; Wallwork Somerset; Dumphey Smith Company; King Insulation Company; United Supply Company; Viking Insulation; SJB Pipe; Wallwork Brothers. See answer to Interrogatory No. B.40.

C.13. Has your company ever employed any employees or salesmen whose responsibility it was to sell your company's asbestos containing products to a geographical area encompassing the State of New Jersey? If so, for each such employee or salesman who worked for your company, indicate the dates of his employment, his name and address.

ANSWER: The following individuals were responsible for sales of asbestos containing products in New Jersey:

Percival Coggins
3993 Park Avenue
Seaford, NY 11783

Al Feininger
909 Midland Avenue
Yonkers, NY 10704

August Pocius
113 Camino Trail
Pontré Bedra Beach, FL 32082

Dudley G. Porter
909 Via Tuins
P.O. Box 1324
Puntagorda, FL 33950

Thomas P. Williams
2261 S. Interlocken Drive
Evergreen, CO 80439

C.14. Give a complete and detailed description of the manner in which your company packaged each of the asbestos containing products that it manufactured and/or distributed in the State of New Jersey. Include in your description the type of packaging that was used and the material each type of packaging was comprised of.

ANSWER: See answer to Interrogatory Nos. C.7 and C.15.

C.15. Did your company affix its corporate logo or insignia on the packages of asbestos containing products that it distributed and sold in the State of New Jersey? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or log was utilized. Annex hereto a photograph or copy of each such logo described in this answer.

ANSWER: Yes. Photographs of various products are located at the document repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties. See also answers to Interrogatories No. B.39 and No. C.7.

C.16. Did the packages or containers for the asbestos containing products that your company sold or distributed in the State of New Jersey contain any writing or labels? If so, for each such package or container which contained a label, set forth the following information about the writing on the package or label:

- a. the size of each label;
- b. the substance of all writing on the label;
- c. the inclusive dates that each writing or label appeared on each type of product;
- d. annex hereto copies of or photographs of each such label that your company used.

ANSWER: See answer to Interrogatory Nos. B.19., B.39., C.7. and C.15.

C.17. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.

ANSWER: See answer to Interrogatory No. C.9. for information regarding asbestos containing products manufactured by Manville Corporation or related entities. The following list provides additional information.

PRODUCT DESCRIPTION AND USE

SHEETS AND BLOCKS

85% Magnesia - A high temperature insulation, composed of carbonate of magnesia and asbestos fiber, for service up to 600 degrees F.

ASBESTOCEL - An inexpensive insulation constructed of alternating layers of plain and corrugated asbestos paper for temperatures up to 300 degrees F.

Air-Cell - Very similar to ASBESTOCEL, constructed of alternating layers of plain and corrugated asbestos paper.

Asbestos "Navy Brand" FIRE FELT - A special grade of insulation, particularly adapted for marine work, or wherever a light weight insulation may be required.

Asbestos FIRE FELT - Insulating material made from felted and molded asbestos fiber for temperatures up to 1000 degrees F.

Asbestos Molded Blocks - Composed of a mass of felt-like asbestos fibers closely cemented together with a non-conducting compound.

Asbestos Sponge (Felted, Sectional, Molded) - An insulation made of layers of thin felt, composed of asbestos fiber and particles of finely ground spongy material forming an extremely cellular felt, built up like a book in laminated form, thereby confining a large volume of minute dead air cells in the felt and between the layers; for temperatures up to 700 degrees F.

EQUALITY - A material consisting of 50% carbonate of magnesia combined with asbestos and other fire-proof materials. It is especially manufactured to meet government specifications.

Flexible MIN-K - A fibrous insulating material designed principally for use on rockets, missiles, and jet aircraft; can withstand high heat and has an extremely low thermal conductivity.

High Temperature Insulation - Composed of a refractory material base of high insulating value combined with asbestos fiber and some carbonate of magnesia.

MAGNO - Consists of 35% carbonate of magnesia combined with asbestos fiber and other insulating materials. It is particularly

adaptable for insulating heating systems and is specified by U.S. and state governments for this purpose.

MIN-K 1301 - A molded fibrous insulating material designed principally for use on rockets, missiles, and jet aircraft; can withstand high heat (1000 degrees F, and has an extremely low thermal conductivity.

MIN-K 2000 - See MIN-K 1301; can withstand heat to 2000 degrees F.

MIN-K 500 - See MIN-K 1301; can withstand heat to 500 degrees F.

SONITE - Made of MIN-K insulation and used by the U.S. Navy as an underwater sound insulation.

SUPEREX 1900 - A high temperature insulation for service up to 1900 degrees F made from asbestos fiber, diatomaceous silica, and other insulating materials.

SUPEREX 2000 - A high temperature insulation for service up to 2000 degrees F; replacement product for SUPEREX 1900, with asbestos removed by 1973.

SUPEREX-M - A high temperature insulation for service up to 1600 degrees F made from asbestos fiber, diatomaceous silica, and other insulating materials; replaced by asbestos free SUPEREX 1600 in 1973.

SUPEREX SG - A block of SUPEREX insulation bonded to a fiberglass blanket.

Silicated THERMOBESTOS - Dry granular sodium silicate added to THERMOBESTOS. See THERMOBESTOS.

Super FIRE FELT - A lighter weight variation of Asbestos FIRE FELT; temperature limit of 700 degrees or 1000 degrees F, depending on construction.

THERM-O-BESTOS - A waterproofed asbestos material of high insulating value used for building underground conduit systems designed to house hot lines.

THERMOBESTOS - A high temperature insulation, made from lime, diatomaceous silica, and asbestos fiber, for service up to 1200 degrees F.

Thermo FIRE FELT - Similar to Asbestos FIRE FELT, except that it has a cellular asbestos structure completely enclosed in the center of the sheet, giving it increased efficiency and resiliency; for temperatures up to 1000 degrees F.

VITRIBESTOS - Made of asbestos felts which have been corrugated and built up to form a cellular sheet, then vitrified to make them more resistant to moisture and high temperature. The vitrified product has lower insulating value than untreated products. Used for lining smokestacks and flues, building theater curtains, and wherever a strong, stiff product is required that will resist temperatures up to 800 degrees F.

Vitro FIRE FELT - Similar to Thermo FIRE FELT except that the cellular asbestos structure is vitrified to increase rigidity.

SECTIONAL PIPE INSULATION

85% Magnesia - See 85% Magnesia under SHEETS AND BLOCKS.

ANTI-SWEAT - Made from water-proof insulating paper and wool felt, it prevents condensation from cold water pipes by insulating the pipe from warm air.

AQUA Covering - Solid laminations of wool felt one-half inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

ASBESTOCEL - See ASBESTOCEL under SHEETS AND BLOCKS; in this design, the air channels run around the pipe instead of lengthwise, which prevents the circulation of air.

Air-Cell - See Air-Cell under SHEETS AND BLOCKS; in this design, the air channels run lengthwise, parallel to the pipe.

Asbestos "Navy Brand" FIRE FELT Covering - See Asbestos "Navy Brand" FIRE FELT under SHEETS AND BLOCKS.

Asbestos Air-Chamber Covering - Formed by layers of fire-proof Asbestos Lining Felt, Hair Felt, Asbestos Sheating, and Canvas. An additional layer of Hair Felt and Asbestos Sheating form Double Air Chamber.

Asbestos Combination Spiral Pipe Insulation - Consists of a layer of CEILINITE (see under PAPER, FELTS, BLANKETS) over which is wrapped a layer of asbestos listing. Used on irregular runs of pipe, or where severe vibration is encountered, as an automobile exhaust pipes and on locomotives; temperature limit of 1000 degrees F.

Asbestos FIRE FELT Covering - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos Molded Sectional Covering - See Asbestos Molded Blocks under SHEETS AND BLOCKS.

Asbestos Sectional Covering - composed of a fire-proof non-conducting lining of asbestos, surrounded by alternate layers of asbestos and non-conducting felt.

Asbestos Sponge Felted Sectional Covering - See Asbestos under SHEETS AND BLOCKS.

Asbestos and Hair Felt Removable Covering - A form of Air Chamber Covering composed of standard hair felt with an inner layer of asbestos fiber of equal thickness, the whole enclosed in a strong wrapper or case of wool sheathing and a lining of asbestos sheathing.

Asbestos Hair Felt Covering - Consists of layers of Asbestos Hair Felt, composed of long fiber asbestos and cattle hair, built up on the pipe.

CHAMPION Sectional Covering - Solid laminations of wool felt three-quarters of an inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

EQUALITY - See EQUALITY under SHEETS AND BLOCKS.

EUREKA Covering - Made of one-quarter inch asbestos felt on the inside of the section, and the balance (three-quarters of an inch) of alternate layers of asbestos and wool felt.

EXPRESS Covering - Solid laminations of wool felt three-quarters of an inch thick with one layer of asbestos paper. See Wool Felt Sectional Pipe Insulations.

Fine Corrugated ASBESTOCEL - Similar to ASBESTOCEL, except the corrugations are smaller; however, there are 50% more laminations per inch of thickness and the additional small enclosed air cells provide greater efficiency.

High Temperature Insulation - See High Temperature Insulation under SHEETS AND BLOCKS.

INDENTED - Made up of several layers of pure indented Asbestos Felt, wire stitched together; the indentations cause air spaces to be formed between the layers, improving insulating efficiency.

MAGNO - See MAGNO under SHEETS AND BLOCKS.

METAL-ON - THERMOBESTOS pipe insulation with a factory applied jacket of aluminum; joints are sealed with special aluminum "snap-straps" and metal bands.

NATIONAL Sectional Covering - Composed of corrugated soft wool felt, lined on the inside and alternated for three layers with

asbestos lining felt; an economical covering for use on low pressure steam lines.

PERFECTION Sectional Covering - Composed of one-half inch indented wool felt wrapped around one-half inch rolled asbestos.

STANDARD Sectional Covering - Solid laminations of wool felt one inch thick with an interlining of two layers of asbestos paper. See Wool Felt Sectional Pipe Insulation.

SUPEREX 1900 - See SUPEREX 1900 under SHEETS AND BLOCKS.

SUPEREX-M - See SUPEREX-M under SHEETS AND BLOCKS.

Safety Blow-Off Covering - Protects boiler blow-off pipes against corrosion by hot gases and prevents explosions resulting from sudden changes of temperature when operating boilers.

Silicated THERMOBESTOS - See Silicated THERMOBESTOS under SHEETS AND BLOCKS.

THERM-O-BESTOS - See THERM-O-BESTOS under SHEETS AND BLOCKS.

THERMOBESTOS - See THERMOBESTOS under SHEETS AND BLOCKS.

VITRIBESTOS Covering - See VITRIBESTOS under SHEETS AND BLOCKS.

Wool Felt Sectional Pipe Insulations - An inexpensive insulation made of wool felt and asbestos paper. See STANDARD, EXPRESS, CHAMPION, and AQUA for more detail.

ASBESTOS MILLBOARD

ASBESTOS MILLBOARD (All Grades) - Made of asbestos fiber and suitable binders, this is recommended where relatively thin sheets or boards are required for protection against fire, heat, and acid fumes. Used as a fireproof lining for floors, partitions, ceilings, and elevator shafts. Also used in ranges, stoves, grates, etc. Made in various degrees of hardness and temperature resisting properties.

BOARD

ASBESTOS EBONY - A densely pressed hard sheet of asbestos fiber and binding cements, impregnated with an insulating compound and used for switchboards, controller plates, switch bases, etc. Has high dielectric strength, insulation resistance, strength, and durability.

DEKERAN - A mineral glaze surfacing with exceptional abrasion and stain resistance that is completely fireproof. Available on 3/16 Marine Veneer either plain or perforated.

Flat Transite - Incombustible asbestos-cement sheets, resistant to corrosion and weather.

MARINET 45 - A calcium silicate structural - insulating board for feeding and conveying nonferrous metals up to 1800 degrees F.

MARINITE - A composition of asbestos fiber, diatomaceous silica and lime formed with calcium silicate sheets which have structural strength, fire resistance, and insulating value; used as fire-safe wall partitions in ship construction and as a fireproof base for wood veneers; also used to construct industrial ovens and other insulating enclosures, for handling molten metals, as drying trays in dielectric core drying ovens, for back-up of electrotape printing mats, and for fireproof doors.

MARINITE 23 - The MARINITE panel with the best thermal insulating characteristics; recommended where strength and hardness are of secondary importance, in applications where the material is not subjected to direct abuse or where it serves as a core for veneering; the 23 indicates a density of 23 lbs. pcf.

MARINITE 30

MARINITE 36 - The MARINITE panel that provides the best combination of structural strength, surface hardness, and insulating value; recommended for most applications; the 36 indicates a density of 36 lbs. pcf.

MARINITE 65 - The MARINITE that is recommended where structural strength and surface hardness are of primary importance; the 65 indicates a density of 65 lbs. pcf.

MOLTEN METAL MARINITE - A board insulation made of amosite fiber, diatomaceous silica, and an inorganic binder; it is an ideal material for feeding and conveying molten metals up to 1350 degrees F. Also available as heat treated MOLTEN METAL MARINITE.

Marine Acoustical Unit - Square sections of perforated Marine Veneer with attached elements of sound-absorbing material; used for acoustical treatment in ship construction.

Marine Veneer - Strong, flexible, fire-resistant sheets made of asbestos and cement; used for low-maintenance ceilings and wall facings on ships.

Metal Veneered MARINITE

PALLITE - Sheet material formed from asbestos fiber and inorganic binder; used in drying operations in ceramic plants.

REEFERITE - An incombustible, corrosion-proof panel composed of a solid aluminum core faced on both sides with Marine Veneer.

Sugarine Bulkhead - Corrugated asbestos cement sheets used as bulkhead piling to control erosion along lakeshores and inland waterways.

TRANSITE Acoustical Panel - A panel made of an asbestos-cement facing used in conjunction with a mineral fiber sound absorbing element.

TRANSITE Core Plate - Smoothly sanded, hydrothermally cured asbestos-cement board especially compounded to properly support cores during drying or baking; widely used in the manufacture of castings of brass, aluminum, gray iron, malleable iron, and steel.

Veneered MARINITE

FINISHES

AERTITE - An asphalt-asbestos coating for troweling over the outside of boiler walls.

INSULKOTE ET - A non water-vapor barrier, non-burning, weather proof coating for use over insulation where "breathing" is required.

INSULKOTE SG AND ST - Weatherproofing and vapor barrier coatings for insulations on refrigerated equipment. INSULKOTE SG is an excellent anti-corrosion coating.

PAPER, FELT, BLANKETS

#50 Asbestos Weatherproofing Felt - An asphalt-saturated asbestos felt used in waterproofing asphalt for work below grade.

#12 Asbestos Paper Tape - Paper tape made from 12 lb. asbestos paper, it is felted, composed of asbestos fiber and binder. It comes in 2 or 3 inch rolls, and is used to wrap duct joints and in many other applications.

15A Asbestos Jacket - A lightweight asphalt-saturated asbestos finishing felt.

45A Asbestos Jacket - An asphalt saturated asbestos felt with a sand finish; a heavy, long life weatherproofing jacket.

7700 Coated Asbestos Jacket - An asphalt-saturated and coated asbestos felt with a smooth outer surface, it is designed to be given a field coating of asphalt.

ARMATURO Asbestos Paper - An asbestos paper integrally reinforced with cotton-scrim cloth; used as an insulation in electrical equipment; temperature limit is 500 degrees F.

ARP-40 - Asbestos reinforced plastic used as the facing of KVLAD INTERLOK and in other aircraft and missile applications; when furnished in tape form, called ARP Tacky Tape.

ASBESTOCEL Paper - A corrugated paper formed of successive corrugations of an asbestos felt, held together by an asbestos fireproof backing.

Asbestos Corded Sheathing - Consists of pure Asbestos Sheathing, to the surface of which are attached loosely twisted rolls of asbestos, forming a very strong fabric about one-quarter of an inch thick. It is particularly valuable as a fire-proof, non-conductive covering for furnaces, furnace pipes, and other fire-heated surfaces, etc.

Asbestos FIRE FELT - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos FIRETARD - A fire-retardant weatherproof jacket consisting of a sheet of asphalt-saturated asbestos felt cemented to a sheet of unsaturated asbestos felt; used on outdoor pipe insulation and small diameter vessels wherever fire hazards are present.

Asbestos Felt - Composed entirely of pure asbestos, is fireproof, and possesses three times the strength of hair felt.

Asbestos Jelly Rolls - Made of Asbestos Roll FIRE FELT, these are used to pack boiler and still-setting expansion joints.

Asbestos Lining Felt - This material consists of pure Asbestos Sheathing, to one side of which is attached a layer of "flocked" or felted asbestos, forming a strictly fireproof, non-conducting lining for hair felt, protecting it from the injurious effects of heat when applied to steam pipes, boilers, etc.

Asbestos Lining and Deadening Felt - Same as Asbestos Lining Felt; also used for lining floors, walls, etc., to deaden sound.

Asbestos Locomotive Lagging - Composed of large strands or twisted rolls of pure asbestos, woven in a fine asbestos warp, and lined with a pure Asbestos Sheathing, forming a strong, matted, felt-like material of great non-conducting power.

Asbestos Pipe Blanket - Made of asbestos cloth, filled with asbestos fiber and quilted; for pipes, fittings and flanges where inspection is made frequently and necessitates removal of the insulation; the asbestos cloth used is special to suit each temperature and service condition up to 950 degrees F.

Asbestos Roll FIRE FELT - See Asbestos FIRE FELT under SHEETS AND BLOCKS.

Asbestos Scaffolding -

Asbestos Sponge Felt - A thin felt, composed of asbestos fiber and particles of finely ground spongy material forming an extremely cellular felt for temperatures up to 700 degrees F.

Asbestos Sponge Hair Felt - Composed of asbestos sponge and hair, it forms a good covering for steam pipes, boilers, mining purposes, etc.; it is very elastic, and owing to the large proportion of asbestos, is not liable to injury from steam heat.

Asbestos Turbine Blanket - Consists of high temperature felted mineral insulation fully enclosed in a wire inserted asbestos cloth for temperature exposure to 850 degrees F, or a stainless steel mesh for temperatures from 850 degrees F to 1100 degrees F.

Asbestos and Hair Woven Felt - Similar to Asbestos Locomotive Lagging, but contains 25% hair; it is very elastic and practically fire-proof.

CEILINITE - Made from Asbestos Roll FIRE FELT, reinforced on one side with asbestos cloth; used as an inter-lining, for fireproofing electrical apparatus such as switch boxes, and for similar purposes requiring a strong, flexible, fireproof felt; for temperatures up to 1000 degrees F.

Commercial Grade Asbestos Paper - A standard asbestos paper varying in weight from 6 to 32 lbs. per 100 sq. ft. and in thicknesses from .015 to .0625 inches. Asbestos paper is formed from asbestos fiber and a suitable binder and used where an insulating material of minimum thickness is required.

D.C. FLEXSTONE - A high quality asbestos felt. Saturated and coated with asphalt on both sides; used to make weather-proof jackets for insulated pipe lines located outdoors.

DOUBLEX Asbestos Paper - A paper made from asbestos and a lime silicate binder used by neon sign manufacturers to make templates or patterns; also used for pouring gates in foundries.

Engineers Insulating Tape

FIBROID Asbestos Paper - Used as an electrical insulation; made from asbestos paper and a binder, it can withstand temperatures up to 500 degrees F.

High Temperature Flexible MIN-K Blankets - See Flexible MIN-K under SHEETS AND BLOCKS.

High Strength FIBROID Asbestos Paper - See FIBROID Asbestos Paper; can be used for service up to 600 degrees F.

Long Fiber Asbestos Paper - Made with high grade long asbestos fiber; for use as a thermal insulation, gasketing, or as a mass sheet for saturating; minimum fiber content 88%.

MICROBESTOS - A high grade chrysotile asbestos paper which can be readily saturated with various resins to provide a very uniform prepreg reinforcing material; for use in the manufacture of reinforced plastic products and in the oblativ field.

MIN-KLAD - A molded combination of MIN-K and asbestos reinforced plastic faces.

NIAGRITE - A felted asbestos tape for wrapping around electrical cables as fireproofing; usually reinforced with burlap or asbestos cloth.

Non-Burn Asbestos Paper - A medium length fiber paper with high fiber content; suitable for continuous service at 400 degrees F.

Standard Flexible MIN-K Blankets - See Flexible MIN-K under SHEETS AND BLOCKS.

Super FIRE FELT - See Super FIRE FELT under SHEETS AND BLOCKS.

THERMO FELT - An asbestos hair felt composed of 50% cattle hair and 50% asbestos, with a burlap center; used in steel passenger cars and street cars.

THERMOMAT - A nonwoven long fiber asbestos felt saturated with phenolic resin; furnished as a molding compound in sheet or tape form; extremely resistant to high temperatures; used as a rocket motor liner and in other aviation and missile applications.

THERMOTAPE - A flexible pipe insulation in strip or roll form made of an asbestos pad in a neoprene coated asbestos cloth jacket; used on locomotives and cars where sectional insulation can't be applied effectively.

THERMOWRAP - A pipe insulation made up of a blanket of asbestos fibers held together by asbestos yarns and enclosed in a neoprenecoated asbestos jacket; primarily designed for steam lines on trains; High Temperature THERMOWRAP is designed for use on diesel exhaust lines and in similar high temperature situations.

Welding Paper

White Surface Asbestos Jacket - A pipe insulation jacket made from asbestos weatherproof felt.

SEALING COMPOUNDS

Sealing Compounds are plastic, putty-like materials for sealing out (or in) air, dust, moisture, etc. The products and their main sealing uses follow.

ALBASEAL - Air conditioners, refrigeration equipment.

AQUASEAL - Threaded or jacketed joints.

BRANCHITE - Sewer Pipe connections.

Body Sealer - Auto, truck, and trailer bodies.

DUXSEAL - Wires and cables at duct entrances; general purpose.

H-NAVASEAL - Electrical duct apertures aboard ship; a heat (H) resistant, practically incombustible sealer for Navy applications.

HF-NAVASEAL - Electrical duct apertures aboard ship; a heat and flame (HF) resistant, practically incombustible sealer for Navy applications.

Industrial Vent Caulking

NODRSEAL - Refrigeration equipment and general purpose.

Stove Putty - Ovens and hot-water heaters where it is not apt to be exposed to intense heat.

TRANOSEAL - Oil filled electrical transformers.

Type T NODRSEAL - Refrigeration equipment and general purpose.

UNISEAL - General purpose.

CEMENTS

0352 Cement - General utility short fiber cement, used by the plumbing and steamfitting trade for insulating heating boilers and pipe fittings; temperature limit 1000 degrees F.

300 Cement

301 Cement

302 Cement - An excellent finishing cement made from asbestos fibers and binding materials, it is light in weight and high in insulating value; temperature limit 1000 degrees F.

304 Cement - Insulating cement made from long fiber asbestos for covering surfaces liable to become red hot; temperature limit 1200 degrees F.

319 Semi-Refractory Cement - A combined insulating and semi-refractory cement used to protect block or brick insulation in flues, stacks, etc.; temperature limit 1600 degrees F.

329 Cement - A lagging cement for finishing over sheets and blocks, for insulating large heated surfaces and for irregular surfaces and fittings, where it is impossible to apply either sectional pipe covering or blocks. It is very light, full of confined air, elastic and spongy, and forms an excellent plastic non-conductor.

340 Cement - An insulating and finishing cement lower in covering capacity and price than the 302 Cement; temperature limit 1000 degrees F.

352 Cement - General utility short fiber cement, used in large quantities by the plumbing and steamfitting trades for insulating heating boilers and pipe fittings; used as a finish over block insulation and in general applications; temperature limit 1000 degrees F.

364 Cement - A medium grade insulating cement; temperature limit 1000 degrees F.

400 Cement - A combination of asbestos and other material of high insulating value, ideal for general use where efficiency, strength, and durability are desired; temperature limit 700 degrees F.

450 Cement - A mineral wool base insulating cement with excellent adhesion which permits it to be readily applied to surfaces too irregular to insulate with sheets or blocks; adheres to hot or cold surfaces but is not a finishing cement; temperature limit 1200 degrees - 1500 degrees F.

500 Cement - A cement composed of asbestos fiber and expanded mica which combines high covering capacity and heat resistance with good working qualities. Can be used at temperatures up to 1800 degrees F if entire reclaimability is not essential. Completely reclaimable at temperatures up to 1500 degrees F. Useful for irregular surfaces where block insulation is not adaptable, but not ordinarily used for finishing.

678 Semi-Refractory Cement - An air-setting, hydraulic cement which is a combination finishing and semi-refractory cement for use as a protective coating over block insulation linings exposed to the action of moving gases in flues, breechings, and stacks. Where erosive action is severe such as in pulverized coal units and particularly in area where the gases change direction sharply, the cement should be protected with temperature resistant metal; temperature limit 1900 degrees F.

85% Magnesia Cement - Composed of the same material as 85% Magnesia sectional and block insulation, it is essentially an insulating and not a finishing cement; temperature limit 600 degrees F.

ASBESTILE Cement - A heavy bodied cement of asbestos fibers, asphalt, and other mineral ingredients; specifically designed for sealing flashings with a watertight bond.

ASBESTOMENT - A refractory powder which when mixed with water produces an outer coating on the fireproofing of electrical cables; usually used with NIAGRITE.

FIBROFIL - A mixture of diatomaceous silica and asbestos fibers; used as an insulating fill for irregular spaces.

FIREITE Furnace Cement - An asbestos compound for mounting, sealing, and repairing joints in stoves, boilers, furnaces, heaters, and ranges.

Fibrous Adhesive - A strong silicate soda and asbestos fiber cement used for temporary bonding of insulation to brick, concrete, metal, or other surfaces as well as for bonding prefab fittings; temperature limit 500 degrees F.

Fil Insul - A resilient fill composed of mineral fibers; used for insulating irregular surfaces.

Heat Treating Cement - A ready-mixed refractory cement for use in the heat treating of high carbon steel parts; for temperatures up to 2500 degrees F.

LAPTITE Cement - A heavy brushing fibrated cut-back asphaltic cement with a temperature limit of 140 degrees F. Used for sealing the laps of weatherproof insulating jackets.

MX-3808 Asbestos Filler

Navy 450 Cement - A specially formulated variation of 450 Cement to meet Navy specifications.

SUPEREX Cement - The same material as used in SUPEREX sectional and block insulation; used with SUPEREX or THERMO-12 pipe and block

insulation for patching, pointing up joints, and covering irregular shapes.

SUPEREX Cement for Navy - A specially formulated variation of SUPEREX Cement to meet Navy specifications.

THERMOBESTOS Cement - The same material used in THERMOBESTOS sectional and block insulation.

THERMOMIX 700, 720, 770, 810 - Insulating cements designed for use in missile engines; these compounds contained a special heat resistant phenolic resin system of the dry type.

C.18. During the years that your company manufactured and/or sold asbestos containing materials, did your company prepare and/or publish any sales or promotional literature which depicted and described these products? If so, describe the particular literature which your company prepared and indicate the information the literature contained. Describe who has custody of this literature at the present time.

ANSWER: All such sales or promotional literature for Manville Corporation or related entities in the possession, custody or control of the Fund is located at the records repository in Denver, Colorado, and will be made available for inspection and copying at a time convenient to the parties. In addition to the documents which will be specifically identified and produced at that time, there may be additional documents responsive to this Interrogatory among the general collection of documents in the repository. This collection of documents will be made available to Plaintiff for review at a time agreed upon by the parties. See Answer to Interrogatory No. 39.

C.19. Has your company manufactured asbestos containing products and materials which were distributed by another entity or corporation under their name or trademark? If so, identify each such entity which sold or distributed these products, indicate which of your company's products this company marketed and indicate the inclusive dates that this particular commercial arrangement existed.

ANSWER: The Fund has been unable to identify products which were manufactured by Manville Corporation or related entities but which were sold by other companies.

C.20. Has your company marketed under its own name or trademark any asbestos containing insulation products which were manufactured by another corporation? If so, identify each and every product which your company marketed which was manufactured by another corporation, indicate the inclusive dates that you marketed each product and describe the name, trade name and generic name of each such product which your company marketed.

ANSWER: Manville Corporation or related entities have, on occasion, marketed products manufactured by other companies.

Raybestos-Manhattan, Nippon Asbestos of Tokyo and Atlas Asbestos Company manufactured asbestos cloth and asbestos tape marketed under the Johns-Manville logo from approximately 1969 through 1974.

Additionally, in 1969, Manville or related entities entered into an agreement with Raybestos-Manhattan, Inc., whereby Manville agreed to market profile calendar brake linings manufactured by Raybestos-Manhattan, Inc. under the style designations HF, SF, and MF.

Manville or related entities also sold Corrugated Transite, a roofing/sheet product made by GAF, from 1972 through 1977.

The Fund has been unable to identify any other products which were sold by Manville or related entities but which were produced by other companies.

C.21. Were any of the asbestos containing insulation products that defendant sold or distributed into the stream of commerce accompanied by written instructions or package inserts? If so, indicate which such products were provided with such instructions and package inserts, indicate when each product was accompanied by these materials, state the substance of what the instructions or package inserts stated and annex copies of same hereto.

ANSWER: On a continuing basis, Manville Corporation or related entities furnished customers information as to the proper use and application of its insulating products, and directly or indirectly advised industrial insulation contractors to utilize ventilation equipment, such as respirators, at the sites where finished insulation products were being worked with and applied. Those respirators which have been recommended were approved by the federal government for use as protection against asbestos.

Manville Corporation or related entities also affixed caution instructions to products regarding the handling of these products. See response to Interrogatory No. B.19. In addition, Manville's product literature contained recommendations regarding respirator usage and utilization of adequate dust collection systems when fabricating, handling and applying certain asbestos containing materials.

Manville Corporation or related entities participated in and contributed to the informational and educational program of the National Insulation Manufacturers Association (NIMA). This program

was designed to educate the insulation contractors' industry with respect to the health aspects of exposure to asbestos.

To this end, NIMA sponsored a number of regional meetings to aid contractors in minimizing or eliminating the inhalation of asbestos fibers by those who worked with, installed or applied asbestos containing thermal insulation products. In 1967 and 1968, approximately eight hundred insulation contractors attended these regional meetings.

Approximately three hours in length, these programs included a review of: 1) the biological effects of exposure to asbestos; 2) the threshold limit value for asbestos; 3) methods for evaluating concentrations of dust; and 4) engineering and method recommendations designed to assist the contractors in dust abatement and environmental control.

The highlights of these presentations were published in several booklets prepared by NIMA. One such booklet, entitled "Recommended Safe Practices for Handling and Applying Thermal Insulation Products Containing Asbestos," printed May 1, 1968, was written by members of the NIMA Education and Information Committee. This booklet was distributed during the 1968 meetings. In addition, the booklet was distributed to customers, employees and other interested parties.

The chairman of the NIMA Education and Information Committee was Clifford L. Sheckler, who, at that time, was Manager, Accident Prevention and Health Administration at Manville. Other members of the committee included John Vyverberg, Owens-Corning Fiberglass Corporation; Harry Mesler, Ruberoid Company; Leon Horowitz, Certain-Teed Corporation; and Jack Barnhart, Executive Secretary of NIMA.

Manville Corporation or related entities also distributed the following materials to employees who were exposed to asbestos or asbestos containing products in the course of their employment:

An employee notification form entitled "Dear Johns-Manville Employee" reminded employees of the risks associated with asbestos exposure. This was inserted in paychecks of all employees at all Johns-Manville Sales Corporation contract units beginning in 1970.

A pamphlet entitled "Safe Work Manual" published by Johns-Manville Corporation in 1971.

A booklet entitled "What Every Employee Should Know About Asbestos" published by Johns-Manville Corporation in 1973. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A pamphlet entitled "Recommended Safety Practices for Handling Asbestos Fiber" published by Johns-Manville Corporation in November 1973. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A booklet entitled "What You Should Know Asbestos and Health" published by Johns-Manville Corporation in January 1975. This booklet was distributed to all employees at all locations using asbestos fiber or handling products containing asbestos fiber.

A booklet entitled "Before You Begin" published by Johns-Manville Corporation in 1976 and designed to be given to prospective employees before beginning work in an asbestos-using operation.

A booklet entitled "Questions and Answers Concerning Asbestos" published by Johns-Manville Corporation in 1982.

In 1976, Manville Corporation or related entities began to publish a Catalog of Occupational Environmental Health and Safety Programs as listed below. All of the publications, audio-visual programs and other material listed in this catalog were made available to Manville customers and public interest groups as well as to all Manville personnel.

A pamphlet entitled "Occupational Health Guide - Asbestos" published by Johns-Manville Corporation in 1976. This guide was designed as a reference for supervisory personnel.

A 25-minute slide/tape presentation on industrial hygiene programs at Manville.

A 20-minute slide/tape program on health aspects of working with asbestos.

A 25-minute motion picture on occupational health risks associated with asbestos fiber.

A newspaper entitled "The Asbestos Report" published by Johns-Manville Corporation in 1976.

In 1980, Manville Corporation or related entities published the 1980-1981 edition of the Health, Safety and Environment Catalog which, in addition to the above, included:

"A Study of the Problem of Asbestos in Water," which was a reprint of a report by the American Water Works Association Research Foundation. This report was the result of intensive

study and literature search and covered all aspects of the use and safety of asbestos-cement pipe materials.

"Asbestos Facts," published by Johns-Manville Corporation, was a series of one-page fact sheets covering various aspects of the asbestos and health issue.

"Asbestos Minerals in Modern Technology," published by Johns-Manville Corporation, was a comprehensive review of mineralogy.

"Does Asbestos-Cement Pipe Pose a Health Hazard?" This reprint of an article in California Builder & Engineer discussed the health questions regarding the use of asbestos-cement pipe.

"Dust Control Techniques in the Asbestos Industry," published by Johns-Manville Corporation, summarized engineering efforts at Manville to control the emission of asbestos in mining, milling and manufacturing operations.

"The Asbestos Issue: A Matter of Principle," published by Johns-Manville Corporation in 1979, reported on issues related to asbestos health concerns and covered research efforts, Manville health programs and actions.

"Today: Special Asbestos Update," published by Johns-Manville Corporation, covered asbestos policy, benefits and applications, types of diseases and groups affected.

Manville Corporation or related entities cooperated with the Asbestos Information Association in the production of the following booklets:

"Recommended Work Practices - Molding and Fabrication of Asbestos-Containing Plastic Products."

"Recommended Work Practices - Fabrication and Use of Asbestos Friction Materials."

"Recommended Work Practices - Fabrication and Use of Asbestos Paper Products."

"Recommended Work Practices - Shop and Field Fabrication of Asbestos Sheet Products."

"Recommended Work Practices - Use and Handling of Asbestos Textile Products."

Additionally, Manville Corporation or related entities participated in 1971 through the Occupational Health and Safety

Committee of the National Insulation Contractors Association in the preparation of a booklet entitled "Safety Reminders."

Over the years, Manville Corporation or related entities also produced, published or distributed for use by employees a number of booklets which addressed a number of different safety and health issues in Manville operations. Many of these booklets addressed safe work practices to minimize exposure to dust.

In addition, until Manville Corporation or related entities ceased manufacturing asbestos containing materials, there were many oral presentations and meetings at the plant level concerning safety practices related to asbestos exposure.

Respectfully submitted,

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Attorneys for Manville
Corporation Asbestos
Disease Compensation Fund

AFFIDAVIT

I, DAVID T. AUSTERN, being of full age and first duly sworn, depose and state that I am GENERAL COUNSEL of the Manville Corporation Asbestos Disease Compensation Fund, a defendant in this action; that I am authorized to make this affidavit on its behalf; that the matters stated in the foregoing Answers to Interrogatories are not within my personal knowledge; that I am informed that no single official, employee, or former employee of either the Fund or of Manville Corporation has personal knowledge of all such matters; that information contained herein has been compiled at my direction by counsel for the Fund, and the responses are in accordance with the information available to them; and that the answers are true and correct, insofar as it is possible to verify them.

Further affiant sayeth naught.

David T. Austern

Subscribed and sworn to
before me this 7th day of
December, 1989.

Larry Finton
NOTARY PUBLIC

My Commission Expires Mar 14 1994

Exhibit "A"

Manville Asbestos Containing Thermal
Insulation or Shipyard Products

Product Name: #12 Asbestos Paper Tape
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0
Date Manufactured: 1936
Date Discontinued: 1980
Date Labeled: None

Product Name: 15A Asbestos Jacket
Product Type: Paper, Felt
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 57.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: None

Product Name: 45A Asbestos Jacket
Product Type: Felt, Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: None

Product Name: #50 Asbestos Weatherproofing Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 55.0
Date Manufactured: 1923
Date Discontinued: 1976
Date Labeled: 1970

Product Name: 55 Cable Fireproofing Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 72.0
Date Manufactured: 1956
Date Discontinued: 1982
Date Labeled:

Product Name: 85% Magnesite
Product Type: Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.3 - 15.0
Date Manufactured: 1902
Date Discontinued: 1970
Date Labeled: 1964

Product Name: 85% Magnesite Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.3 - 15.0
Date Manufactured: 1902
Date Discontinued: 1970
Date Labeled: 1965

Product Name: 88 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 58.0
Date Manufactured: 1960
Date Discontinued: 1983
Date Labeled: None

Product Name: 89 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 58.0
Date Manufactured: 1955
Date Discontinued: 1983
Date Labeled: None

Product Name: 91 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 61.0
Date Manufactured: 1957
Date Discontinued: 1983
Date Labeled: None

Product Name: 95 (1/16) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 32.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 95 (1/8) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 19.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 96 (1/16) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 25.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 96 (1/8) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 18.0
Date Manufactured: 1942
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 (1/32, 3/32) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 45.0
Date Manufactured: 1903
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 (1/16, 1/4) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 39.0
Date Manufactured: 1903
Date Discontinued: 1983
Date Labeled: None

Product Name: 101 Asbestos Millboard (Hard)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 69.2 - 78.5
Date Manufactured: 1910

Date Discontinued: 1951
Date Labeled: None

Product Name: 102 Asbestos Millboard (Medium)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 86.6
Date Manufactured: 1910
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 103 Asbestos Millboard (Soft)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 76.0 - 90.0
Date Manufactured: 1910
Date Discontinued: 1951
Date Labeled: None

Product Name: 104 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 92.8
Date Manufactured: 1915
Date Discontinued: 1951
Date Labeled: None

Product Name: 105 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 77.0 - 92.8
Date Manufactured: 1915
Date Discontinued: 1951
Date Labeled: None

Product Name: 106 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 70.0 - 91.2
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 106B Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile

% Fiber by Weight: 95.0
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 106H Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 87.0 - 88.0
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 135 Tadpole Gasketing Tape
Product Type: Tape
Fiber Type:
% Fiber by Weight: 36.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled: None

Product Name: 135-S Tadpole Gasketing Tape
Product Type: Tape
Fiber Type:
% Fiber by Weight: 36.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled: None

Product Name: 219 Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 84.0 - 86.8
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: 300 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 100.0
Date Manufactured: 1932
Date Discontinued: 1970
Date Labeled: None

Product Name: 301 Cement

Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 14.7 - 18.8
Date Manufactured: 1915
Date Discontinued: 1971
Date Labeled: 1965

Product Name: 302 Cement (Originally called Asbestos Cement
Felting; later known as Fire Felt Insulating Cement)
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 49.4 - 70.0
Date Manufactured: 1858
Date Discontinued: 1970
Date Labeled: 1965

Product Name: 304 Cement (Asbestos Hot Blast Cement)
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 53.4
Date Manufactured: 1884
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 319 Semi-Refractory Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 20.0 - 21.0
Date Manufactured: 1925
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 320 Cement
Product Type: Cement
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight:
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: 329 Cement
Product Type: Cement
Fiber Type:
% Fiber by Weight:
Date Manufactured: 1890
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: 340 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 60.0
Date Manufactured: 1908
Date Discontinued: 1969
Date Labeled: None

Product Name: 0352 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 25.0 - 40.0
Date Manufactured: 1931
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 352 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 100.0
Date Manufactured: 1923
Date Discontinued: 1973
Date Labeled: 1965

Product Name: 364 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 60.0
Date Manufactured: 1908
Date Discontinued: 1955
Date Labeled: None

Product Name: 400 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 21.6 - 23.0
Date Manufactured: 1915
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 450 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 7.1 - 38.5
Date Manufactured: 1930

Date Discontinued: 1971
Date Labeled: 1965

Product Name: 500 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 16.7 - 20.0
Date Manufactured: 1933
Date Discontinued: 1971
Date Labeled: 1965

Product Name: 678 Semi-Refractory Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 20.0 - 35.0
Date Manufactured: 1941
Date Discontinued: 1969
Date Labeled: 1965

Product Name: 7700 Coated Asbestos Jacket
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 24.0 - 26.0
Date Manufactured: 1931
Date Discontinued: 1983
Date Labeled: None

Product Name: AAAA Grade
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAAA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1970
Date Labeled: None

Product Name: AAAA Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile

% Fiber by Weight: 99.0 - 100.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAA Grade (788, 857, 869, 873)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AAA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: AAA Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AAA Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 99.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AA Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: AA Grade Asbestos Tape

Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1981
Date Discontinued: 1983
Date Labeled: 1972

Product Name: AA Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 90.0 - 95.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: A Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 85.0 - 90.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled: 1972

Product Name: A Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 85.0 - 90.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: AERTITE
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 14.7 - 18.0
Date Manufactured: 1920
Date Discontinued: 1982
Date Labeled: None

Product Name: Air-Cell (Generic name for ASBESTOCEL)
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1908
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: ALBASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 40.0
Date Manufactured: 1953
Date Discontinued: 1975
Date Labeled: None

Product Name: ANTI-SWEAT
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 72.0
Date Manufactured: 1903
Date Discontinued: 1965
Date Labeled: None

Product Name: ARMATURO Asbestos Paper (Insulating Jacket)
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 84.0 - 97.0
Date Manufactured: 1920 - 1924
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: ARP-40 (Insulating Jacket)
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 60.0
Date Manufactured: 1963
Date Discontinued: 1971 - 1975
Date Labeled: Unknown

Product Name: Asbestica Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1948
Date Discontinued: 1982
Date Labeled:

Product Name: ASBESTILE Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 8.2 - 21.8
Date Manufactured: 1930
Date Discontinued: 1982

Date Labeled: None

Product Name: ASBESTOCEL
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1902
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: ASBESTOCEL Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1902
Date Discontinued: 1924 - 1931
Date Labeled: None

Product Name: ASBESTOCITE
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0 - 45.0
Date Manufactured: 1927
Date Discontinued: 1975
Date Labeled: 1970

Product Name: ASBESTOMENT
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 6.0
Date Manufactured: 1923
Date Discontinued: 1970
Date Labeled: None

Product Name: Asbestos Air Chamber Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not Available
Date Manufactured: 1880
Date Discontinued: 1893 - 1895
Date Labeled: None

Product Name: Asbestos and Hair Felt Removable Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available

Date Manufactured: 1891
Date Discontinued: 1896 - 1900
Date Labeled: None

Product Name: Asbestos and Hair Woven Felt (Originally called
Asbestos and Hair Lagging)
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1884
Date Discontinued: 1890
Date Labeled: None

Product Name: Asbestos Combination Spiral Pipe Insulation
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1931
Date Discontinued: 1934 - 1936
Date Labeled: None

Product Name: Asbestos Corded Sheathing
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1887
Date Discontinued: 1896 - 1900
Date Labeled: None

Product Name: ASBESTOS EBONY
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 47.0 - 75.0
Date Manufactured: 1911
Date Discontinued: 1984 - 1985
Date Labeled:

Product Name: Asbestos Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1890
Date Discontinued: 1890 - 1891
Date Labeled: None

Product Name: Asbestos FIRE FELT

Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 61.0 - 63.0
Date Manufactured: 1891
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos FIRE FELT
Product Type: Sheet/ Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos Fire Felt Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 41.0 - 61.5
Date Manufactured: 1891
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Asbestos Fire Felt Locomotive Lagging
Product Type: Sheet/ Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1903 - 1906
Date Labeled: None

Product Name: Asbestos FIRETARD
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 88.9 - 92.0
Date Manufactured: 1931
Date Discontinued: 1980
Date Labeled: 1970

Product Name: Asbestos Hair Felt Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1911 - 1915
Date Labeled: None

Product Name: Asbestos Jelly Rolls
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: 90.0
Date Manufactured: 1930
Date Discontinued: 1968
Date Labeled: None

Product Name: Asbestos Lining and Deadening Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1903 - 1906
Date Labeled: None

Product Name: Asbestos Lining Felt
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1871 - 1877
Date Discontinued: 1900
Date Labeled: None

Product Name: Asbestos Locomotive Lagging (Originally called
Asbestos Lagging)
Product Type: Paper, Felt, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1884
Date Discontinued: 1900
Date Labeled: None

Product Name: Asbestos Millboard (In Hard, Medium and Soft Grades)
Product Type: Sheet
Fiber Type:
% Fiber by Weight: Not available
Date Manufactured: 1896
Date Discontinued: 1910
Date Labeled: None

Product Name: Asbestos Millboard (Originally called Asbestos
Board)
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: Not available

Date Manufactured: 1871 - 1875
Date Discontinued: 1896
Date Labeled: None

Product Name: Asbestos Molded Blocks
Product Type: Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1900
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Asbestos Moulded Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1891
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Asbestos "Navy Brand" FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1902
Date Discontinued: 1915 - 1925
Date Labeled: None

Product Name: Asbestos "Navy Brand" FIRE FELT Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1902
Date Discontinued: 1915 - 1925
Date Labeled: None

Product Name: Asbestos Pipe Blanket
Product Type: Blankets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 98.0 - 99.0
Date Manufactured: 1898
Date Discontinued: 1960
Date Labeled: None

Product Name: Asbestos Roll FIRE FELT
Product Type: Felt, Blankets

Fiber Type: Chrysotile
% Fiber by Weight: 91.0 - 99.0
Date Manufactured: 1891
Date Discontinued: 1900
Date Labeled: 1970

Product Name: Asbestos Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1888
Date Discontinued: 1890
Date Labeled: None

Product Name: Asbestos Sheathing
Product Type: Sheet
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not Available
Date Manufactured: 1869
Date Discontinued:
Date Labeled:

Product Name: Asbestos Sponge Hair Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1893
Date Discontinued: 1900 - 1903
Date Labeled: None

Product Name: Asbestos Sponge Felt
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 68.0 - 96.2
Date Manufactured: 1890
Date Discontinued: 1961
Date Labeled: None

Product Name: Asbestos Sponge (Felted, Sectional, Molded)
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1890
Date Discontinued: 1953 - 1959
Date Labeled: None

Product Name: Asbestos Steam Packing
Product Type: Rope
Fiber Type:
% Fiber by Weight: Not available
Date Manufactured: 1871
Date Discontinued:
Date Labeled:

Product Name: Asbestos Turbine Blanket
Product Type: Paper, Felt, Blankets
Fiber Type: Amosite
% Fiber by Weight: 98.0 - 99.0
Date Manufactured: 1951
Date Discontinued: 1977
Date Labeled: 1971

Product Name: Besto-Tak
Product Type: Tape
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: 75.0 - 100.0
Date Manufactured: 1959 - 1963
Date Discontinued: 1975 - 1978
Date Labeled: 1972

Product Name: Body Sealer
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 37.0 - 41.0
Date Manufactured: 1954
Date Discontinued: 1975
Date Labeled: None

Product Name: BRANCHTITE
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured: 1954
Date Discontinued: 1974
Date Labeled: None

Product Name: C Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 60.2 - 67.6
Date Manufactured: 1918
Date Discontinued: 1980
Date Labeled: 1970

Product Name: CELLINITE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 98.0
Date Manufactured: 1910
Date Discontinued: 1973
Date Labeled: 1970

Product Name: CELLAMITE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight:
Date Manufactured: 1939 - 1947
Date Discontinued: 1959 - 1963
Date Labeled: None

Product Name: CHAMPION Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: Commercial Grade (566, 702, 733, 787)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Commercial Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Commercial Grade Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0
Date Manufactured: 1929

Date Discontinued: 1980
Date Labeled: 1970

Product Name: Commercial Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1970

Product Name: Commercial Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled: 1972

Product Name: D.C. FLEXSTONE
Product Type: Felt
Fiber Type: Chrysotile
% Fiber by Weight: 30.0 - 85.0
Date Manufactured: 1929
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: DEKERAN
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 29.6 - 34.6
Date Manufactured: 1963
Date Discontinued: 1975
Date Labeled: 1970

Product Name: DOUBLEX Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 80.0
Date Manufactured: 1936
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: DUXSEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile

% Fiber by Weight: 52.5 - 69.0
Date Manufactured: 1934
Date Discontinued: 1982 - Asbestos Content
Date Labeled: None

Product Name: Engineers Insulating Tape
Product Type: Blankets
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1926
Date Discontinued: 1956
Date Labeled: None

Product Name: EQUALITY
Product Type: Sheet/Block
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: EUREKA Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: EXPRESS Covering (See Wool Felt Sectional Pipe
Insulation)
Product Type: Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: FIBROFIL
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 30.0
Date Manufactured: 1940
Date Discontinued: 1969
Date Labeled: None

Product Name: FIBROID Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0
Date Manufactured: 1911
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: Fibrous Adhesive
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 14.0 - 20.0
Date Manufactured: 1887
Date Discontinued: 1981 - Asbestos Content
Date Labeled: None

Product Name: FIL-INSUL
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 70.0 - 80.0
Date Manufactured: 1930
Date Discontinued: 1969
Date Labeled: None

Product Name: Fine Corrugated ASBESTOCEL
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile
% Fiber by Weight: 52.6 - 98.0
Date Manufactured: 1923
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: FIREITE Furnace Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 1.8 - 3.7
Date Manufactured: 1924
Date Discontinued: 1973
Date Labeled: None

Product Name: Flat TRANSITE
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 22.0 - 69.2
Date Manufactured: 1907
Date Discontinued: 1985
Date Labeled: 1970

Product Name: FLEXBOARD
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0 - 50.0
Date Manufactured: 1927
Date Discontinued: 1983
Date Labeled: 1970

Product Name: Flexible MIN-K
Product Type: Sheet
Fiber Type: Amosite
% Fiber by Weight: 20.0
Date Manufactured: 1963
Date Discontinued: 1975
Date Labeled: 1970

Product Name: Heat Treating Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 1.0
Date Manufactured: 1954
Date Discontinued: 1973
Date Labeled: None

Product Name: High Strength FIBROID Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 85.7 - 88.0
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: High Temperature Flexible MIN-K Blankets
Product Type: Blankets
Fiber Type: Amosite
% Fiber by Weight: 20.0
Date Manufactured: 1963
Date Discontinued: 1974
Date Labeled: 1970

Product Name: High Temperature Insulation
Product Type: Block, Pipe Covering
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1924

Date Discontinued: 1926
Date Labeled: None

Product Name: HF-NAVASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 27.0
Date Manufactured: 1955
Date Discontinued: 1975
Date Labeled: None

Product Name: H-NAVASEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 48.0
Date Manufactured: 1951
Date Discontinued: 1975
Date Labeled: None

Product Name: INDENTED
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1924
Date Labeled: None

Product Name: Industrial Vent Caulking
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 53.0
Date Manufactured: 1957
Date Discontinued: 1974
Date Labeled: None

Product Name: INSULKOTE ET
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 11.7 - 15.5
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: INSULKOTE SG
Product Type: Finishes
Fiber Type: Chrysotile

% Fiber by Weight: 14.7 - 16.7
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: INSULKOTE ST
Product Type: Finishes
Fiber Type: Chrysotile
% Fiber by Weight: 6.2 - 21.0
Date Manufactured: 1929
Date Discontinued: 1982
Date Labeled: None

Product Name: LAPTITE
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 10.0 - 16.9
Date Manufactured: 1938
Date Discontinued: 1954
Date Labeled: None

Product Name: Long Fiber Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 88.0 - 98.5
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: MAGNO
Product Type: Sheet/Block
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: MARIMET 45
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 43.0 - 44.0
Date Manufactured: 1970
Date Discontinued: 1985
Date Labeled: 1970

Product Name: MARINITE

Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 40.0 - 50.0
Date Manufactured: 1936
Date Discontinued: 1940 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 23
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 25.0 - 27.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 30
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 49.7 - 50.0
Date Manufactured: 1949
Date Discontinued: 1970
Date Labeled: None

Product Name: MARINITE 36
Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 29.7 - 57.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: MARINITE 65
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 55.5 - 70.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: Marine Acoustical Unit
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0
Date Manufactured: 1941
Date Discontinued: 1975-78
Date Labeled: 1970

Product Name: Marine Veneer
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 31.0 - 51.0
Date Manufactured: 1938
Date Discontinued: 1985 - Asbestos content
Date Labeled: 1970

Product Name: Metal Veneered MARINITE
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 15.0 - 40.0
Date Manufactured: 1951
Date Discontinued: 1973
Date Labeled: 1970

Product Name: METAL-ON
Product Type: Jackets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1959
Date Discontinued: 1974
Date Labeled: 1966

Product Name: MICROBESTOS
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 40.0 - 97.0
Date Manufactured: 1959
Date Discontinued: Approximately 1980
Date Labeled: None

Product Name: MIN-K 500
Product Type: Sheet/Block
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1958
Date Discontinued: 1977
Date Labeled: 1970

Product Name: MIN-K 1301
Product Type: Sheet/Block
Fiber Type: Amosite
% Fiber by Weight: 5.0 - 12.0
Date Manufactured: 1958
Date Discontinued: 1975

Date Labeled: 1970

Product Name: MIN-W 2010
Product Type: Sheet, Block
Fiber Type: Amosite
% Fiber by Weight: 5.0 - 12.0
Date Manufactured: 1959
Date Discontinued: 1975
Date Labeled: 1970

Product Name: MIN-KLAD
Product Type: Blankets
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1958
Date Discontinued: 1972
Date Labeled: 1970

Product Name: MOLTEN METAL MARINITE
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 38.0 - 40.0
Date Manufactured: 1962
Date Discontinued: 1980
Date Labeled: 1970

Product Name: MX-3808 Asbestos Filler
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 52.0 - 55.0
Date Manufactured: 1951
Date Discontinued: 1970
Date Labeled: 1965

Product Name: MX 4851 (Aluminized) Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 75.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: MX 5184 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 65.0

Date Manufactured: 1971
Date Discontinued:
Date Labeled: None

Product Name: MX 5215 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 69.0
Date Manufactured: 1971
Date Discontinued:
Date Labeled: None

Product Name: MX 5243 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 65.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: MX 5385 Cloth (Coated)
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 50.0
Date Manufactured:
Date Discontinued:
Date Labeled: None

Product Name: NATIONAL Sectional Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1891
Date Discontinued: 1900 - 1903
Date Labeled: None

Product Name: Navy 450 Cement
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: 13.5 - 38.5
Date Manufactured: 1941
Date Discontinued: Not Active about 1972
Date Labeled: 1965

Product Name: NIAGRITE
Product Type: Felt, Blankets

Fiber Type: Chrysotile
% Fiber by Weight: 98.0
Date Manufactured: 1911
Date Discontinued: 1973
Date Labeled: 1970

Product Name: NODRSEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 59.4
Date Manufactured: 1947
Date Discontinued: 1975
Date Labeled: None

Product Name: Non-Burn Asbestos Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 97.0
Date Manufactured: 1900
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: PALLITE
Product Type: Board
Fiber Type: Amosite
% Fiber by Weight: 50.0
Date Manufactured: 1937
Date Discontinued: 1973
Date Labeled: 1970

Product Name: PERFECTON Pipe Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1908 - 1911
Date Labeled: None

Product Name: REEFERITE
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 29.0 - 37.0
Date Manufactured: 1950
Date Discontinued: 1974
Date Labeled: 1970

Product Name: Safety Blow-Off Covering
Product Type: Pipe Insulation
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1903
Date Discontinued: 1915 - 1920
Date Labeled: None

Product Name: Silicated THERMOBESTOS
Product Type: Sheet/Block, Pipe Covering
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1966
Date Discontinued: 1974
Date Labeled: 1966

Product Name: SONITE
Product Type: Block
Fiber Type: Amosite
% Fiber by Weight: 5.0
Date Manufactured: 1969
Date Discontinued: 1975
Date Labeled: 1970

Product Name: Standard Flexible MIN-K Blankets
Product Type: Paper, Felt, Blankets
Fiber Type: Amosite
% Fiber by Weight: up to 20.0
Date Manufactured: 1963
Date Discontinued: 1974
Date Labeled: 1970

Product Name: STANDARD Sectional Covering (See Wool Felt Sectional
Pipe Insulation)
Product Type: Pipe Insulation
Fiber Type:
% Fiber by Weight: up to 59.0
Date Manufactured:
Date Discontinued:
Date Labeled:

Product Name: Stove Putty
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 15.0 - 25.0
Date Manufactured: 1934
Date Discontinued: 1971

Date Labeled: None

Product Name: Submarine Bulkhead

Product Type: Board

Fiber Type:

% Fiber by Weight: Not available

Date Manufactured: 1963

Date Discontinued: 1967

Date Labeled: None

Product Name: Super FIRE FELT

Product Type: Sheet/Block, Paper, Felt, Blanket

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 40.0 - 60.0

Date Manufactured: 1925

Date Discontinued: 1971 - 1975

Date Labeled:

Product Name: SUPEREX 1900

Product Type: Sheet/Block

Fiber Type: Chrysotile and/or Amosite

Fiber by Weight: 10.0 - 12.0

Date Manufactured: 1922

Date Discontinued: 1973

Date Labeled: 1965

Product Name: SUPEREX 2000

Product Type: Sheet/Block

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 9.0 - 12.0

Date Manufactured: 1971

Date Discontinued: 1972 - Asbestos content

Date Labeled: 1971

Product Name: SUPEREX Cement

Product Type: Cement

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 8.4 - 15.0

Date Manufactured: 1922

Date Discontinued: 1973

Date Labeled: 1965

Product Name: Superex Cement for Navy

Product Type: Cement

Fiber Type: Chrysotile and/or Amosite

% Fiber by Weight: 7.0 - 20.0

Date Manufactured: 1941
Date Discontinued: 1957
Date Labeled: 1965

Product Name: SUPEREX-M
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 8.4 - 15.0
Date Manufactured: 1930
Date Discontinued: 1971
Date Labeled: 1965

Product Name: SUPEREX-SG
Product Type: Sheet/Block
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 10.0
Date Manufactured: 1969
Date Discontinued: 1973
Date Labeled: 1966

Product Name: THERM-O-BESTOS
Product Type: Sheet/Block, Pipe Insulation
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: Not available
Date Manufactured: 1937
Date Discontinued: 1947
Date Labeled: None

Product Name: THERMOBESTOS
Product Type: Block, Pipe Covering
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1950
Date Discontinued: 1974
Date Labeled: 1964

Product Name: Thermobestos Cement
Product Type: Cement
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 7.0 - 14.3
Date Manufactured: 1959
Date Discontinued: 1969
Date Labeled: None

Product Name: THERMO FELT
Product Type: Felt

Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1931
Date Discontinued:
Date Labeled:

Product Name: Thermo FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1936
Date Labeled: None

Product Name: THERMOMAT
Product Type: Felt, Tape
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 49.6 - 96.0
Date Manufactured: 1931
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Thermomix 700
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 720
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 770
Product Type: Cement
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermomix 810
Product Type: Cement
Fiber Type: Crocidolite
% Fiber by Weight: Not available
Date Manufactured: 1966
Date Discontinued: 1970
Date Labeled: 1970

Product Name: Thermo-Pac 500 (Twisted Asbestos Rope Packing)
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1917
Date Discontinued: 1983
Date Labeled: 1972

Product Name: Thermo-Pac 750
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 95.0 - 98.0
Date Manufactured: 1969
Date Discontinued: 1982
Date Labeled: 1972

Product Name: Thermo-Pac 1000
Product Type: Rope
Fiber Type: Chrysotile
% Fiber by Weight: 98.0 - 100.0
Date Manufactured: 1917
Date Discontinued: 1983
Date Labeled: 1972

Product Name: Thermo-Pac Blue
Product Type: Rope
Fiber Type: Crocidolite
% Fiber by Weight: 100.0
Date Manufactured: 1917
Date Discontinued: 1973
Date Labeled: 1972

Product Name: THERMOTAPE
Product Type: Tape
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 75.0 - 80.0
Date Manufactured: 1951
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: Thermo-Wrap
Product Type: Sheet, Block, Blankets
Fiber Type: Unknown (Probably Chrysotile)
% Fiber by Weight: Not available
Date Manufactured: 1939-1950
Date Discontinued: 1971-1975
Date Labeled:

Product Name: THERMOWRAP
Product Type: Blankets
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 90.0
Date Manufactured: 1951
Date Discontinued: 1971 - 1975
Date Labeled:

Product Name: TRANOSEAL (TRANOLSEAL)
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 38.0 - 47.1
Date Manufactured: 1947
Date Discontinued: 1974
Date Labeled: None

Product Name: TRANSITE Acoustical Panel
Product Type: Board
Fiber Type: Chrysotile
% Fiber by Weight: 33.0
Date Manufactured: 1937
Date Discontinued: 1974
Date Labeled: 1970

Product Name: TRANSITE Core Plate
Product Type: Board
Fiber Type: Chrysotile and/or Amosite
% Fiber by Weight: 52.0 - 71.0
Date Manufactured: 1938
Date Discontinued: 1985
Date Labeled: 1970

Product Name: Type A Asbestos Millboard
Product Type: Sheet
Fiber Type: Chrysotile
% Fiber by Weight: 95.7 - 99.0
Date Manufactured: 1918

Date Discontinued: 1980
Date Labeled: 1970

Product Name: Type I WOODSEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 50.0 - 55.0
Date Manufactured: 1954
Date Discontinued: 1975
Date Labeled: None

Product Name: Underwriter's Grade Asbestos Cloth
Product Type: Cloth
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1974
Date Labeled:

Product Name: Underwriter's Grade Asbestos Tape
Product Type: Tape
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1983
Date Labeled:

Product Name: Underwriter's Grade Asbestos Tubing
Product Type: Tubing (Braided)
Fiber Type: Chrysotile
% Fiber by Weight: 80.0 - 85.0
Date Manufactured: 1884
Date Discontinued: 1982
Date Labeled:

Product Name: UNISEAL
Product Type: Sealing Compound
Fiber Type: Chrysotile
% Fiber by Weight: 53.0 - 59.0
Date Manufactured: 1947
Date Discontinued: 1975
Date Labeled: None

Product Name: Unspecified Grade, Originally Offered
Product Type: Cloth
Fiber Type: Chrysotile

% Fiber by Weight:
Date Manufactured: 1871 - 1875
Date Discontinued:
Date Labeled:

Product Name: Veneered MARINITE
Product Type: Board
Fiber Type: Amosite and/or Chrysotile
% Fiber by Weight: 16.0 - 41.0
Date Manufactured: 1955
Date Discontinued: 1975 - Asbestos Content
Date Labeled: 1970

Product Name: VITRIBESTOS
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1959
Date Labeled: None

Product Name: Vitro FIRE FELT
Product Type: Sheet/Block
Fiber Type: Chrysotile
% Fiber by Weight: Not available
Date Manufactured: 1908
Date Discontinued: 1936
Date Labeled: None

Product Name: Welding Paper
Product Type: Paper
Fiber Type: Chrysotile
% Fiber by Weight: 99.0
Date Manufactured: 1930
Date Discontinued: Approximately 1980
Date Labeled: 1970

Product Name: White Surface Asbestos Jacket
Product Type: Jacket
Fiber Type: Chrysotile
% Fiber by Weight: 82.0
Date Manufactured: 1931
Date Discontinued: 1971
Date Labeled: None

Product Name: XXX Asbestos Millboard

Product Type: Sheet
Fiber Type: Chrysotile
Fiber by Weight: 67.0 - 75.0
Date Manufactured: 1913
Date Discontinued: 1980
Date Labeled: 1970