

MAR-29

WOLF, BLOCK, SCHORR and SOLIS-COHEN
 By: Anthony S. Minisi, Barry M. Klayman
 Identification Nos. 03082, 26097
 Twelfth Floor Packard Building
 Philadelphia, Pennsylvania 19102
 (215) 977-2000

Attorneys For Defendant,
 Pittsburgh Corning
 Corporation

VERNELL LONDON, Executrix of the	:	PHILADELPHIA COUNTY
Estate of BIRK REED	:	COURT OF COMMON PLEAS
	:	
v.	:	MAY TERM, 1983
NICOLET INDUSTRIES, INC., et al.	:	NO. 6849 (2268)
	:	<u>ASBESTOS CASE</u>

ANSWERS OF DEFENDANT, MAREMONT CORPORATION,
 PRODUCT IDENTIFICATION INTERROGATORIES

Pittsburgh Corning Corporation directs these
 Interrogatories to all defendants pursuant to Rule 4005 of the
 Pennsylvania Rules of Civil Procedure.

DEFINITIONS

1. "Person" shall mean an individual person, a
 corporation, partnership, or any other kind of entity.

2. The words "document" or "documents" shall have
 the same meaning and scope as in Rule 4009 of the Pennsylvania
 Rules of Civil Procedure and shall include, without limitation,
 any written, printed, recorded or graphic matter or computer
 input or output, however produced or reproduced, that:

(a) are now or were formerly in your
 possession, custody or control; or

(b) are known or believed to be responsive to
 these interrogatories, regardless of who has or formerly had
 custody, possession, or control.

3. (a) "Identify" and "identity", when used with reference to a natural person, means to state his full name, present or last known address, present or last known title, position or business affiliation, his title, position or business affiliation at the time in question and a general description of his duties or the business in which he is engaged.

(b) "Identify" and "identity", when used with respect to any other entity, means to state its full name, the address of its principal place of business and the name of its chief executive officers.

(c) "Identify" and "identity", when used with respect to a document, means to state the name or title of the document, the type of document (e.g. letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its present location and its present custodian. If any such document was, but is no longer, in plaintiff(s') possession or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorizing for, such disposition and the date or approximate date thereof. In the event that the document is produced in accordance with the Request for the Production of Documents filed herewith, then such production shall be sufficient identification of such document.

INTERROGATORIES

1. Do you claim that plaintiff(s) worked with or was/were exposed to any materials or products containing asbestos which were produced by Pittsburgh Corning Corporation, Inc.?

Yes.

2. Name specifically and describe in detail the materials or products produced by Pittsburgh Corning Corporation with which plaintiff(s) worked or to which plaintiff(s) was/were exposed.

At Sun Ship Company, Chester, Pennsylvania as alleged in Paragraph 6 of plaintiff's Complaint. Investigation is continuing and this Answer will be supplemented if necessary.

3. For each material or product named in the preceding Interrogatory, state the following:

(a) the dates of plaintiff(s') exposure to each particular material or product;

Answering defendant believes plaintiff was exposed to insulation products of Pittsburgh-Corning in 1943.

(b) the exact location at which plaintiff(s) was/were exposed to each particular material or product;

See answer to #3(a).

(c) the particular job which plaintiff(s) was/were performing at the time of each exposure;

Unknown.

(d) the purpose for which each Pittsburgh Corning product or material was used at the time of each exposure.

Unknown.

4. Has/have plaintiff(s) ever indicated in any manner that he/they has/have used or been exposed to any Pittsburgh Corning Corporation product or material?

See Complaint.

5. Give complete details of any communication, oral or written, made by plaintiff(s) that you contend demonstrates that he/they was/were exposed to any Pittsburgh Corning Corporation product or material.

Unknown.

6. List all individuals who have any information regarding the allegation that plaintiff(s) was/were exposed to or worked with any asbestos-containing material or product manufactured by Pittsburgh Corning Corporation.

Unknown.

7. Set forth all details of information possessed by the individuals named in the preceding Interrogatory.

Not applicable.

SWEENEY, SHEEHAN & SPENCER

By Walter S. Jenkins
Walter S. Jenkins
Attorney for Maremont
Corporation

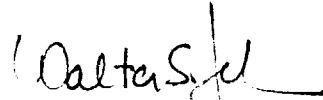
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OF COUNSEL:

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V E R I F I C A T I O N

WALTER S. JENKINS, ESQUIRE, hereby states that he is the attorney in this action and verifies that the statements made in the foregoing Pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsifications to authorities.

A handwritten signature in dark ink, appearing to read "Walter S. Jenkins", written over a horizontal line.

WALTER S. JENKINS

DATE: March 8, 1984

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March 8, 1984

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Philadelphia, PA 19102

RE: London v. MAREMONT, et al
MAY TERM, 1983, NO. 6849
Our File #RG-1299

Dear Mr. Minisi:

Enclosed you will please find a copy of the Answer of Defendant, Maremont Corporation, to Product Identification Interrogatories of Defendant, Pittsburgh-Corning Corporation, the original of which has been duly filed with the Court.

Very truly yours,

SWEENEY, SHEEHAN & SPENCER

By Walter S. Jenkins
Walter S. Jenkins

WSJ/gfg

Enclosure

cc: All Counsel (w/encl.)