

CARRINGTON

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PLAINTIFF'S
EXHIBIT
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STACY LANCASTER COZAD

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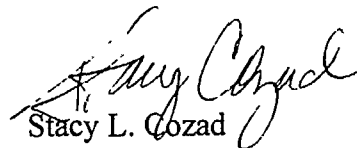
Ben K. Dubose, Esq.
Barron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

Re: Case No. CC-99-08033-B; *Malcom Lee Murphy, Jr. and Annette Harbert Murphy*
v. Owens Corning et al.

Dear Mr. Dubose:

Enclosed please find Crane Co.'s Answers to Plaintiffs' Master Interrogatories and Requests for Production in the above-referenced cause.

Very truly yours,


Stacy L. Cozad

SLC/bsm
Encl.

MALCOM LEE MURPHY, ET AL.,

Plaintiffs,

vs.

OWENS-CORNING FIBERGLAS
CORPORATION, ET AL.,

Defendants.

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IN THE COUNTY COURT

AT LAW NO. 2

DALLAS COUNTY, TEXAS

**CRANE CO.'S ANSWERS TO PLAINTIFFS' MASTER
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Defendant Crane Co. hereby serves its Answers to Plaintiffs' Master Interrogatories and Requests for Production ("Discovery Requests").

PRELIMINARY STATEMENT/OBJECTIONS/RESERVATION OF RIGHTS

A. The following responses are based upon the information that is presently known and reasonably available to Crane Co. Crane Co. believes that these responses are accurate as of the date made. However, many of the matters inquired about in the Discovery Requests took place decades ago. Due to the passage of time, information may be incomplete or no longer available. Nevertheless, Crane Co. has endeavored to investigate all relevant facts and circumstances. The following answers are based upon its investigation. Crane Co. cannot, however, exclude the possibility that its continued investigation may reveal more complete information. Crane Co.'s investigation into the matters inquired into in the Discovery Requests continues. The investigation is dependent upon locating knowledgeable individuals and relevant documents and information on an ongoing basis. No finite completion date can be placed upon those efforts. Crane Co. has made

a reasonable effort to answer the Discovery Requests to the best of its present knowledge, information and belief.

B. Crane Co. objects to the Discovery Requests to the extent they seek information and/or documents that are protected by any privilege or protection, including but not limited to the attorney-client, joint-defense, and/or the work product privileges. Crane Co. and its counsel hereby assert all applicable privileges and protections with respect to such information and/or documents. To the extent the Discovery Requests seek information or documents not presently known to or readily ascertainable by Crane Co., Crane Co. reserves all rights to object to the subsequent discovery on the aforementioned basis or any other basis or bases. Crane Co. and its counsel hereby assert and maintain all applicable privileges and protections with respect to any information and/or documents that may be subsequently discovered in accordance with these responses.

C. Crane Co. objects to the Discovery Requests to the extent they seek production of any information constituting a trade secret, confidential financial data or other confidential research, development or commercial information.

D. Crane Co. objects to the Discovery Requests to the extent they are unduly burdensome and overbroad or seek information that is not relevant to this lawsuit and that is not reasonably calculated to lead to the discovery of admissible evidence. Much of the information requested may be located in documents Crane Co. is willing to make available to plaintiffs' counsel under the parameters set forth herein. The burden of obtaining responsive information from those documents is the same for plaintiffs as it is for Crane Co.

E. Crane Co. objects to the use of the phrase "predecessor corporation," "predecessors," "successor corporation," or "successors" as being vague, ambiguous, argumentative and/or seeking

a legal conclusion. Unless specifically noted, Crane Co.'s answers to the Discovery Requests are limited to Crane Co., the entity upon whom the Discovery Requests were served.

F. Crane Co. objects to the Discovery Requests to the extent they seek medical records or other privileged and confidential personnel information. To the extent plaintiffs, through the Discovery Requests, seek medical records or other privileged and confidential personnel information, Crane Co. will not provide such information absent an appropriate waiver of the applicable privilege by the appropriate individual(s).

G. Crane Co. does not concede that any of its answers to the Discovery Requests are or will be admissible evidence at a trial of this action. Crane Co. does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answers at trial.

H. Crane Co. objects to the definitions contained in the Discovery Requests to the extent they render the Discovery Requests vague, overbroad, and unduly burdensome. In responding to the Discovery Requests, Crane Co. will use the commonly understood, everyday meanings of the terms used. The breadth and volume of the definitions plaintiffs seek to propound would complicate tremendously the task of responding to the Discovery Requests.

I. Crane Co.'s responses to the Discovery Requests are based upon the documents and information that are known and reasonably available to it and its counsel. Crane Co. cannot exclude the possibility that other documents exist that may provide additional or more complete information. Crane Co. maintains documents in document repositories that may contain relevant information. Crane Co. has not reviewed all documents located in the repositories, because the expense involved with such an effort would be prohibitive and unduly burdensome. Consequently, Crane Co. cannot certify that the documents contained in the repositories do not contain information responsive to the Discovery Requests. The documents located at the repositories are not organized, and Crane Co. is

not able to ascertain whether any of those documents contain information responsive to the Discovery Requests. The repositories contain numerous documents that are not responsive to the Discovery Requests or relevant to this lawsuit. The repositories may also contain documents that are protected by the attorney-client, work product, and/or other applicable privileges or protections. Should plaintiffs wish to review the documents located at any of the repositories, Crane Co. will make certain documents available to plaintiffs, if plaintiffs agree in writing that (i) Crane Co. has not waived any objections it may have with respect to the discoverability of those documents on any ground and (ii) Crane Co. may conduct a post-designation review to remove privileged and irrelevant documents from any collection of documents that may be copied for production to plaintiffs, even if plaintiffs had specifically designated the privileged or irrelevant document for copying. All objections to the discovery of said documents and/or information are expressly reserved.

ANSWERS TO INTERROGATORIES

The foregoing Preliminary Statement/Objections/Reservation of Rights ("Preliminary Statement") is incorporated into Crane Co.'s answer to each of the following interrogatories, as if set forth fully therein.

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER: Crane Co.'s answers to these Discovery Requests were prepared by Crane Co.'s counsel and are based upon counsel's review of numerous documents and historic interviews with past and present employees. Among the employees who provided information contained in these responses is William N. McLean, a consultant presently employed by Crane Co., who previously

served as Crane Co.'s Director of Engineering . Mr. McLean can be contacted through Crane Co.'s counsel.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Crane Co. is a corporation that was originally incorporated in Illinois in or about 1865. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters is located at 100 First Stamford Place, Stamford, Connecticut. The entity authorized to accept service of process in the state of Texas is CT Corporation, 1601 Elm Street, Dallas, Texas 75201.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

ANSWER: To the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory because it is overly broad, unduly burdensome and seeks information neither relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence. Crane Co.'s response to this interrogatory shall not be construed as an admission that Crane Co. was involved

in any activity with respect to asbestos-containing products that are relevant in any way to this lawsuit.

Subject to the foregoing, Crane Co. was not a manufacturer of any asbestos-containing product, as that term is defined and as it is commonly used in asbestos litigation. Crane Co. is and has been a manufacturer of certain types of industrial equipment. Crane Co.'s principal line of industrial equipment throughout the time period requested in this interrogatory was industrial valves. Industrial valves manufactured by Crane Co. were made of steel, bronze, and other metals; the valves themselves were not composed of asbestos. Many of those valves bore the name "Crane," marked directly on the valve. Certain of the valves had enclosed within their metal structure asbestos-containing gaskets, packing, or discs. Crane Co. did not manufacture the asbestos-containing components that may have been encapsulated within the valves, but purchased them from other companies. Any components that may have been enclosed within the metal structure of Crane Co. valves did not emit friable or respirable asbestos fibers while enclosed within that structure. Any asbestos-containing components were completely encapsulated within the metal structure of the valves and/or valve fittings. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component, itself, by a rubber-like compound.

Crane Co. acquired around and subsequent to 1961 the assets of several industrial pump companies that became divisions of Crane Co. Subsequent to those acquisitions, Crane Co. manufactured industrial pumps that may have incorporated within their metal structure an encapsulated asbestos-containing gasket and/or asbestos-containing packing. Crane Co. did not, however, manufacture the asbestos-containing components, such as gaskets or packing, contained in the industrial pumps. It purchased those components from other companies. Any components that may have contained asbestos were enclosed within the metal structure of Crane Co. industrial

pumps and did not emit friable or respirable asbestos fibers while enclosed within that structure. Furthermore, any asbestos contained in the components, themselves, was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. manufactured boilers until 1946 that may have contained asbestos-containing material. Crane Co. also purchased the assets of two boiler companies in the 1960's and resold those assets a few years later. To the best of Crane Co.'s knowledge, however, the boilers that Crane Co. manufactured in the 1960's utilized fiberglass, not asbestos, insulation. For a period of time believed to be less than two years during the early 1960's, Crane Co., through its division Crane-Midwest Piping, was involved with the erection of piping systems in limited geographic areas. In connection with that erection business, Crane Co. is presently aware of one project to which Crane Co. sent flat gaskets that, most likely, contained some asbestos as part of their chemical and physical composition.

Crane Co., through a division, sold industrial water treatment systems, including deaerators, water conditioners, multi-port steam relief valves, drainers, sample coolers, and condensate boosters. Those products were composed primarily of metal; they were not composed of asbestos. Depending on the application for which it was to be used, some of this equipment incorporated internal components, primarily cloth gaskets, manufactured by others, that may have contained some asbestos as part of their chemical composition. Those components were enclosed within the equipment and were not exposed during installation or normal use of the product. Prior to the mid 1980's, Crane Co. may have sold replacement gaskets for use in the industrial water treatment systems. To the best of Crane Co.'s knowledge, Crane Co. did not manufacture any of the internal components, but purchased them from other companies.

Crane Co. also offered for sale certain products manufactured by other companies. A small quantity of those products may have contained asbestos. Crane Co. offered for sale gaskets, packing, and discs manufactured by other companies that may have contained asbestos. Material called Cranite was manufactured exclusively for resale by Crane Co., during the relevant time period through what appears to be the early-to-mid 1970's, but perhaps extending to the early 1980's. The finished "Cranite" products had the name "Cranite" stamped directly upon them. Any asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of any friable asbestos fibers.

Crane Co.'s investigation of its activities regarding asbestos-containing products continues. That investigation is dependent upon locating knowledgeable individuals and/or information on an ongoing basis. No finite completion date can be placed upon those ongoing efforts. Crane Co. has made a reasonable effort to answer these Discovery Requests. See also Preliminary Statement, Section I.

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER: See Answer to Interrogatory No. 4. See also Preliminary Statement, Section I.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.

- C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.
- F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.
- G. The date asbestos was removed from such products, if ever, and the reasons therefor.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each asbestos-containing product.

ANSWER: In addition to the objections stated thus far, Crane Co. specifically objects to this Interrogatory, because (i) it is overly broad and seeks information neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence, (ii) it is not in any way limited to the alleged exposure of the plaintiff in this action, and (iii) it is unduly burdensome, because the multitude of different types of industrial equipment Crane Co. produced makes it impossible to answer.

Subject to the foregoing, see Crane Co.'s Response to Interrogatory No. 4, and Section I of the Preliminary Statement. By way of further answer, Crane Co. states that it placed on the market industrial valves that may have contained asbestos-containing materials within their metal structure as early as 1858. Asbestos was removed as a component from Crane Co.'s industrial valves in the mid-1980's, with the exception of one specific type of valve designed for petroleum industry applications, which incorporated an asbestos component until the early 1990's. In all cases, asbestos was eliminated as a component of Crane Co. products because of decreased consumer demand for

products that incorporated asbestos and/or Crane Co.'s inability to obtain asbestos-containing components. Except for Cranite "sheet packing", Crane Co. cannot state the type or amount of asbestos that may have been a component of any of its products, because, *inter alia*, the asbestos-containing components were manufactured by others. Cranite "sheet packing" was comprised of 75%-85% chrysotile asbestos, the balance consisting of a natural rubber binder and inert fillers. Cranite "sheet packing" was sold in sheet and pre-cut gasket form.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory, because it is unduly burdensome and overbroad. To its knowledge, Crane Co. presently possesses drawings and technical specification data relating to various items of industrial equipment. Crane Co. further possesses technical specifications relating to the manufacture of Cranite "sheet packing".

See also Preliminary Statement, Section I.

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.

- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

ANSWER: In addition to the objections stated thus far, Crane has no present knowledge that it or anyone acting on its behalf ever conducted tests to determine the potential health hazards associated with asbestos. Crane Co. further states that it did not ever believe, nor does it believe today, that any Crane Co. product was harmful when used as intended. See also Preliminary Statement, Section I.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overbroad and seeks information that is neither relevant to the subject matter of this lawsuit, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any "testing" involving the industrial use of Crane Co. products or the time period relevant to this lawsuit. See Preliminary Statement, Section I.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: To the best of Crane Co.'s knowledge, no. See Answer to Interrogatory Nos. 4 and 8 and Preliminary Statement, Section I.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the dates of such tests.
- B. The name, address, and job title of each person who conducted those tests.
- C. The results of those tests.
- D. Whether, as a result of the tests, any products were removed from the market.
- E. The names of all products removed from the market as a result of these tests.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this request to the extent it implies that any Crane Co. product posed a health hazard when used as intended. See Answer to Interrogatory No. 8, Preliminary Statement, Section I.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

- A. The name of each product.
- B. A description of each document and how it relates to each product.
- C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this request to the extent it implies that any Crane Co. product posed a health hazard when used as intended. Crane Co. further objects to this request as being ambiguous. To the extent the request seeks information relating to the lack of any potential health hazard associated with Crane Co. products, see response and objections to Interrogatory No. 8.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 8 or 11? If the answer is affirmative, state:

- A. The names of the products changed or modified.
- B. The name, address, and job title of each person responsible for having made a change or modification.
- C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER: See response and objections to Interrogatory No. 10.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.

- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.
- F. The name, address, and job title of each person responsible for having drafted or issued the warning.
- G. The current location of any such printed material and the custodian thereof.
- H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory as being ambiguous. Crane Co. further objects to this Interrogatory to the extent it implies that a possibility of injury resulted from the intended use of any Crane Co. products. Crane Co. objects to Interrogatory No. 14 as being overly broad and unduly burdensome. Crane Co. did not manufacture any asbestos-containing products, as it understands the term "asbestos containing products" and as that term is commonly used in asbestos litigation. To the best of Crane Co.'s present knowledge, the only "warning" associated with any Crane Co. product regarding asbestos was a notification which first appeared in the mid-1980s, attached to certain industrial valves that informed the user that asbestos-containing materials were contained within the valve. That warning read as follows: "CAUTION – Contains Asbestos Packing or Gasket". See also response and objections to Interrogatory No. 4 and Preliminary Statement, Section I.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Dallas County, Texas, is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.
- B. The date of notice of each claim.

- C. A description of the claim.
- D. The type of injuries allegedly sustained.
- E. The name and address of each attorney who represents each individual making a claim.
- F. The style and court number of each claim.
- G. The disposition of each claim that has been settled or taken to judgment.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 15, because it is overly broad and unduly burdensome and seeks information neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, to the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 16 to the extent it assumes Crane Co. manufactured asbestos-containing products, which is denied. Crane Co. was not a manufacturer of any asbestos-containing product as that term is defined and as it is commonly used in asbestos litigation. The products referred in Crane Co.'s response to Interrogatory No. 4 may have been sold or distributed by entities other than Crane Co. Crane Co. is not presently aware of the specific identity of any of those entities. See Preliminary Statement, Section I.

INTERROGATORY NO. 17:

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas and Virginia? If so, state:

- A. The name and address of each such distributor or sales representatives.
- B. The years in which such company or person distributed, marketed, or sold your products.
- C. What products were distributed, marketed, or sold and in what years.

ANSWER: Crane Co. believes its products may have been sold in the states of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas, and Virginia. See Preliminary Statement, Section I.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: To the best of Crane Co.'s knowledge, it is presently unaware of any person whose identity would be responsive to this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.

- D. The name, job title, and address of each person who currently has possession of each publication and--its present location.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory because it is overbroad and because it seeks irrelevant information that is not likely to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any documents that are specifically responsive to this interrogatory. See Preliminary Statement, Section

I.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each such association or organization.
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date.
 - 2. The current location of such publications.
 - 3. The custodian of such publications.
 - 4. The method or manner in which such publications are maintained.

ANSWER: Crane Co. is not aware of its membership in any organization that disseminated information of the type requested in this interrogatory. To the extent relevant, to the best of its knowledge, Crane Co. was a member of the National Safety Council (approximately 1975-1996) and

the Valve Manufacturers Association (approximately 1938 to present). See Preliminary Statement, Section I.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 21, because it is overly broad, unduly burdensome and seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence because, inter alia, it is not in any way limited to the alleged exposure of the plaintiff in this action.

Subject to the foregoing, to the best of its present knowledge and according to its historic annual reports, without limitation, Crane Co. assembled and/or manufactured valves at plants located in Chicago, Illinois, Chattanooga, Tennessee, Indian Orchard, Massachusetts, Jonesboro, Arkansas, and Washington, Iowa; pumps at plants located in Rogers, Arkansas, Salem, Ohio, and Warrington, Pennsylvania; deaerators at a plant located in King of Prussia, Pennsylvania; and boilers at plants located in Pennsylvania and New Jersey. Crane Co. also manufactured other products at other locations. Crane Co. did not manufacture any of the asbestos-containing components that may have been included in the pumps, valves, deaerators, or boilers. Accordingly, those components would not have been manufactured at any of the locations listed above. See response and objections Interrogatory No. 4, Preliminary Statement, Section I.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

- A. The name, address, and job title of each person or entity who prepared such materials.
- B. The name, address, and job title of each person who currently has possession of such materials and their present location.
- C. The date the materials were prepared.
- D. The media used to disseminate the sales materials.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products, which is denied. To the best of Crane Co.'s knowledge, it distributed catalogs that would have referenced products identified in Interrogatory No. 4. Although Crane Co. is not certain, it assumes it produced other materials, that may or may not have mentioned those products. See Preliminary Statement, Section I.

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.
- B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.

D. The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 23 to the extent that it implies that Crane Co. manufactured asbestos-containing products, which is denied. Subject to the foregoing, Crane Co. is not aware of any document of the type requested in this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER: The following chart identifies the confirmed primary insurance coverage available to Crane Co. Additional primary coverage may be available for prior years; but it is subject to dispute by certain carriers:

Carriers	Policy Number	Term	Limits
Globe Indemnity	GLC 011930	1/1/60-1/1/61	1 M OCC/2M AGG
Globe Indemnity	GLC 011931	1/1/61-1/1/62	1M OCC/2M AGG
CCC	CL 4293679R	7/1/61-7/1/64	1M OCC/2M AGG PER YEAR
Liberty Mutual	LG1621004017028	2/1/68-2/1/69	1M OCC/2M AGG
Liberty Mutual	LG1621004017029	2/1/69-2/1/70	1M OCC/2M AGG
Liberty Mutual	LG1621004017020	2/1/70-2/28/71	1M OCC/2M AGG
Hartford	10 CA 46800	2/28/71-7/1/72	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/72-7/1/73	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/73-7/1/74	1M OCC/1M AGG
Aetna	01AL260803SCA	7/1/76-7/1/77	1M OCC/1M AGG
Aetna	01AL260851SCA	7/1/77-7/1/78	1M OCC/2M AGG
Aetna	01GL8SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01AL265932SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01GL1475SCA	7/1/79-7/1/80	1M OCC/2M AGG

Carriers	Policy Number	Term	Limits
Aetna	01AL265996SCA	7/1/79-7/1/80	1M OCC/2M AGG
Continental	SRL3636025	7/1/80-7/1/81	1M OCC/2M AGG
Continental	SRL3636199	7/1/81-7/1/82	1M OCC/2M AGG
INA	CFG209262	7/1/82-7/1/83	1M OCC/2M AGG
INA	CFG209868	7/1/83-7/1/84	1M OCC/2M AGG
INA	CFG3141403	7/1/84-7/1/85	1M OCC/2M AGG
INA	CFG G07749673	7/1/85-7/1/86	1M OCC/3M AGG

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Subject to the foregoing, Crane Co. first became aware of the alleged association between asbestos exposure and illness in human beings

sometime in the 1970s. Crane Co. does not believe, however, that exposure to any of its products was harmful. See Preliminary Statement, Section I.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: See response and objections to Interrogatory No. 25.

INTERROGATORY NO. 27:

As to pleural disease, pleural thickening or pleural plaques, state:

- A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- F. Who is the custodian of such information.

ANSWER: See response and objections to Interrogatory No. 25.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.
- B. The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.
- H. Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER: See response and objections to Interrogatory No. 25.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

- A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.
- B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?
- C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.
- D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.

ANSWER: See response and objections to Interrogatory No. 25.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory, because it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Subject to the foregoing, Crane Co. did not manufacture or design asbestos-containing products, as it understands those terms. Accordingly, it does not

believe it has any information responsive to this interrogatory. See response and objections to Interrogatory No. 4, Preliminary Statement, Section I.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER: See response and objections to Interrogatory Nos. 4 and No. 6. See also Preliminary Statement, Section I.

INTERROGATORY NO. 32:

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

- A. The name of the company manufacturing the asbestos products.
- B. The trade name affixed to those products.
- C. The periods of time covered by each such agreement.
- D. The volume, in dollar amount, of each transaction.
- E. The initial purchaser of the products.

ANSWER: To the best of Crane Co.'s knowledge, no. See also response and objections to Interrogatory No. 4, Preliminary Statement, Section I.

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any

form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory as being unduly overbroad and as seeking irrelevant information that is not likely to lead to the discovery of admissible evidence. Subject to and without waiving those objections, Crane Co. is not precisely aware of the specific entities from which it obtained asbestos-containing components for its industrial products. Nevertheless, based upon available documents, it appears that, at various times, Crane Co.'s approved suppliers may have included B.F. Goodrich Co., Goodyear Tire & Rubber Co., and Sweet Rubber Co. of Akron, Ohio, with respect to "Cranite" material, Raybestos-Manhattan, Inc., Johns Manville, Inc., Garlock, Inc., "Klingerit" and Nicolet, Inc., with respect to sheet gasket material, Crane Packing Co. (later John Crane-Houdaille, Inc.), Johns-Manville, Inc., Anchor Packing, Raybestos-Manhattan, Greene-Tweed, Garlock, Inc., Lindstrom & King, and R.M. Industrial Products with respect to valve packing, Johns-Manville, Flexitallic, Spirotallic, Lamons Gasket Co., and R-Way Gasket & Supply Co., with respect to spiral wound gaskets and Johns-Manville with respect to miscellaneous materials. The foregoing list is not intended to be an exhaustive list of Crane Co.'s suppliers. To the contrary, it merely reflects the information of which Crane Co. has become aware in the course of reviewing documentary evidence.

See also Preliminary Statement, Section I.

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- A. The name, address, and job title of each person having custody of each of those documents and their current location.

- B. A brief description of each such document, including the dates and the parties signatory.

ANSWER: See answer to Interrogatory No. 32.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and seeks information neither relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence because, inter alia, it is not in any way related to the alleged exposure of the plaintiff in this action. Subject to and without waiving the foregoing objection, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting.

- B. The general subject matter discussed at each meeting.
- C. Who was in attendance at each meeting.
- D. Where and by whom the written minutes are presently maintained.
- E. By whom the minutes were, taken and put into final format.
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 36 to the extent it assumes Crane Co. manufactured asbestos-containing products, which is denied. Crane Co. further objects to this interrogatory to the extent it suggests that Crane Co.'s products presented health hazards when used as intended. Subject to the foregoing, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.

- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER: No.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: Crane Co. does not presently maintain an organized collection of sales documents relating to asbestos-containing products. See Preliminary Statement, Section I.

INTERROGATORY NO. 39:

May you call company representatives as witnesses at the trial of any of these cases? If so, list:

- A. The name, address, and job title of each company representative who may be called.
- B. A summary of the testimony expected to be given by each such witness.
- C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to this interrogatory as being premature. In the absence of product identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co. will produce witness information as required by the applicable rules of civil procedure and/or court order. Subject to the foregoing, Crane Co. may call William N. McLean as a trial witness. See response and objections to Interrogatory No. 1.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

- A. Full and correct name;
- B. Principal place of business;
- C. State of incorporation;
- D. Date of acquisition by Defendant;
- E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER: See response and objections to Interrogatory No. 4.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products,

which is denied. Subject to the foregoing, Crane Co. generally expected the products referenced in its response to Interrogatory No. 4 to reach the purchaser in the same condition in which they were delivered.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos containing products.

ANSWER: In addition to the objections stated thus far, Crane Co. objects to Interrogatory No. 42 to the extent it assumes that Crane Co. manufactured asbestos-containing products, which is denied. Subject to the foregoing, Crane Co. did not control the products referenced in its response to Interrogatory No. 4 once they left its possession. The subsequent use of those products was within the control of the purchaser, not Crane Co.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.
- B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products,

which is denied. Subject to the foregoing, it does not appear that this interrogatory relates to the products identified in Crane Co.'s response to Interrogatory No. 4.

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, which is denied. Subject to the foregoing, gaskets, packing and discs contained in Crane Co. industrial equipment may have needed to be replaced from time to time.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overly broad, unduly burdensome, and seeks information neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence because, inter alia, it is not in any way limited to the alleged exposure of the plaintiff in this action. Subject to the foregoing, to the best of Crane Co.'s knowledge, no. See Preliminary Statement, Section I.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER: See response and objections to Interrogatory No. 45.

INTERROGATORY NO. 47:

Has your company or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- A. Name of the person or firm conducting such studies;
- B. The date the studies began and the date they were completed;
- C. Any publication or other written dissemination of the results of the studies;
- D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, which is denied. Crane Co. did not at any time believe that the intended use of its products created a health risk.

INTERROGATORY NO. 48:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

- A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
- B. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?
- C. State in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER: In addition to the objections stated thus far, to the best of Crane Co.'s knowledge, it presently knows of no individuals or departments who, on its behalf, researched or developed asbestos-containing products. See Preliminary Statement, Section I.

INTERROGATORY NO. 49:

Does your company have, or has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;
- B. Whether or not such Medical Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department.

ANSWER: To the best of Crane Co.'s knowledge, no.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s) and year said warning was first applied.

ANSWER: See response and objections to Interrogatory No. 14.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER: See response and objections to Interrogatory No. 4.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to Interrogatory No. 52 to the extent it implies that Crane Co. manufactured asbestos-containing products, which is denied. Crane further objects to this interrogatory to the extent it implies that there was a product that "could be substituted for" asbestos-containing components that were associated by any Crane Co. product. In the late 1970s and early 1980s, as a result of changes and customer preferences, Crane Co. began to explore the prospect of replacing the asbestos containing components in its industrial products. At that time, Crane Co. encountered difficulty locating suitable substitute materials. Crane Co., nevertheless, modified its engineering specifications in 1985 to phase out asbestos-containing components from all valves other than one specific type of valve designed for petroleum industry applications. See Preliminary Statement, Section I.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- C. The dates of recall;
- D. The purpose for the recall.

ANSWER: See response and objections to Interrogatory No. 52.

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER: See response and objections to Interrogatory No. 52.

INTERROGATORY NO. 55:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER: See response and objections to Interrogatory No. 52.

INTERROGATORY NO. 56:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory, because it is overbroad and seeks information that is neither relevant to the subject matter of this lawsuit nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, Crane Co. is not aware of any industrial hygiene surveys involving the industrial use of Crane Co. products or the time period relevant to this lawsuit.

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.

ANSWER: To its knowledge, Crane Co. has no information available to it that would enable it to answer this Interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 57 for total dust, and not asbestos dust alone?

ANSWER: See response and objections to Interrogatory No. 59.

INTERROGATORY NO. 59:

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

ANSWER: In addition to the objections stated thus far, Crane Co. objects specifically to this interrogatory to the extent it implies Crane Co. manufactured "asbestos-containing products", which is denied. See response and objections to Interrogatory No. 9.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- (a) The name, address, and job classification of each such expert witness;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;
- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER: Crane Co. objects to this interrogatory as being premature. In the absence of firm product identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co. will produce witness information as required by the applicable rules of civil procedure and/or court order.

INTERROGATORY NO. 61:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

- (a) identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.
- (b) Each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;
- (c) the negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;

- (d) each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER: Crane Co. objects to this interrogatory as being premature. In the absence of firm product identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co. will produce witness information as required by the applicable rules of civil procedure and/or court order.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: Crane Co. objects to this interrogatory as being premature. In the absence of firm product identification evidence, Crane Co. has yet to decide its trial strategy. Crane Co. will provide the information requested by the Interrogatory as required by the applicable rules of civil procedure and/or court order.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessor-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

- a. Identify the name and position of the employee or officer who received same;
- b. please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;
- c. please produce all documents upon which your responses above are based;
- d. please identify the name(s) and address(es) of any person(s) who can verify your above response;

- e. did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- f. if so, please produce every document which evidences in any way that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63 (a) above;
- g. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Fleischer-Drinker report in whole or in part for the proposition stated in 63 (e) above?

ANSWER: To the best of Crane Co.'s present knowledge, it never received a copy of the article identified in this interrogatory. See Preliminary Statement, Section I.

INTERROGATORY NO. 64:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U.S. Public Health Service and authored by W. C. Dreessen ("the Dreessen Report")?

- a. Identify the name and position of the employee or officer who received same; -
- b. please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;
- c. please produce all documents upon which your responses above are based;
- d. please identify the name(s) and address(es) of any person(s) who can verify your above response;
- e. did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- f. if so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory 63 (a) above;
- g. if your answer to 63 (e) is yes, when was the first date Defendant relied on the Dreessen Report in whole or in part for the proposition stated in 63 (e) above?

ANSWER: To the best of Crane Co.'s knowledge, it never received a copy of the article identified in this interrogatory. See Preliminary Statement, Section I.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

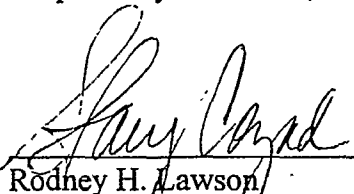
RESPONSE: See Preliminary Statement, Section I. Subject to and without waiving any objection stated thus far, Crane Co. possesses catalogs depicting its products that may be made available to plaintiffs' counsel at a mutually agreeable time and place.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE: Subject to and without waiving any objection stated thus far, in response to this interrogatory, Crane Co. will make its annual reports available to plaintiffs' counsel at a mutually agreeable time and place. See Preliminary Statement, Section I.

Respectfully submitted,



Rodney H. Lawson
State Bar No. 12059700

Stacy Lancaster Cozad
State Bar No. 00796410

CARRINGTON, COLEMAN, SLOMAN
& BLUMENTHAL, L.L.P.

200 Crescent Court, Suite 1500

Dallas, Texas 75201-1848

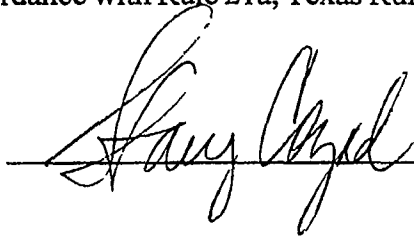
Phone: (214) 855-3000

Fax: (214) 855-1333

Attorneys for Defendant Crane Co.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record in the above cause in accordance with Rule 21a, Texas Rules of Civil Procedure, on this 21st day of March 2000.

_____

VERIFICATION

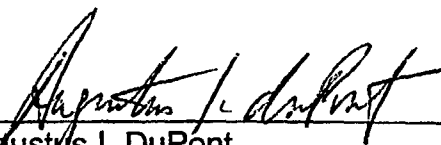
STATE OF CONNECTICUT

COUNTY OF FAIRFIELD

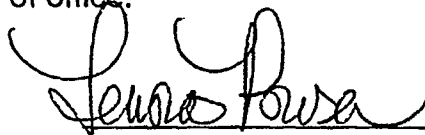
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§
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Stamford, CT 3/16/00

BEFORE ME, the undersigned authority, on this date personally appeared Augustus I. duPont, a duly authorized representative of Crane Co., who being by me first duly sworn on oath says that he has read the foregoing Answers to Interrogatories and that each and every statement of fact contained therein is true and correct to the best of his knowledge, information and belief.


Augustus I. DuPont

Sworn to and subscribed before me on this the 16th day of March, 2000, to certify which witness my hand and seal of office.


Notary Public, State of Connecticut

My commission expires:

LENORA ROWSER

NOTARY PUBLIC

MY COMMISSION EXPIRES DEC. 31, 2004