



IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

ANTHONY MARIO GRECO, et al.,	:	CASE NOS. 323629-323678
	:	(HANNA, J.)
Plaintiffs,	:	
	:	IN RE: ALL BARON & BUDD
vs.	:	ASBESTOS CASES
	:	
A-BEST PRODUCTS COMPANY, et	:	
al.,	:	
	:	
Defendants.	:	

DEFENDANT OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIV.'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS
MASTER SET OF INTERROGATORIES

INTERROGATORY NO. 5: Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
1. The trade or brand name
 2. Its identification number (model, serial number, etc.).
 3. The time period it was manufactured, mined, marketed, distributed or sold.
 4. Its physical description including color, general composition, and form.
 5. A detailed description of its intended use and purpose.

6. A detailed description of the type of package in which it was sold, listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.
7. The percent of asbestos which it contained.
8. The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite).

RESPONSE TO INTERROGATORY NO. 5:

3. Asbestos-containing products were manufactured, marketed, or sold from 1947-1974.
4. See attached Exhibit "A".
5.
 - i. Hot Top Cover - This product was a custom-designed box, designed to fit the top of a Hot Top. It was an exothermic (heat generator) and insulation cover packaged in box form with a thin steel plate separating the exothermic layer from the insulating layer.
 - ii. Ferroboard - This product was used to line ingot molds. The board was custom designed to fit different types of molds.
 - iii. Ferroboard Liner - This product was used to line Hot Top castings and was custom designed to fit different types of Hot Top castings.
 - iv. Redi-Mix/Veneer Compound - This product was a cement-type veneer compound applied over

firebricks or castables and served as a parting compound. Redi-Mix/Veneer Compound were mixed with water and troweled or sprayed onto the inside of a Hot Top.

v. Ferroboard Rings - This product was designed to protect the bottom of a Hot Top casting and formed the shoulder of an ingot.

vi. Ferroseal Gaskets - This product was a soft, spongy type material used in conjunction with Ferroboard Liners.

7 & 8. i. Hot Top Covers contained approximately 20% chrysotile asbestos by weight.

ii. Ferroboard contained approximately 5% amosite asbestos or chrysotile asbestos by weight depending upon customer specifications.

iii. Ferroboard Liners contained approximately 5% amosite asbestos or chrysotile asbestos by weight depending upon customer specifications.

iv. Redi-Mix Veneer Compound contained approximately 2% chrysotile asbestos by weight.

v. Ferroboard Rings contained approximately 5% amosite asbestos by weight.

vi. Ferroseal Gaskets contained approximately 5% amosite.

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

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

RESPONSE TO INTERROGATORY NO. 8.1:

(a) Defendant's response to Interrogatory 8.1 (a) is based upon Defendant's sales records.

(b) **Armco Steel, Ashland, KY:** Ferroboard and Redi-Mix R-2 Compound.

Armco Steel, Houston, TX: Hot Top Covers; Ferroboard; Redi-Mix R-2 compound; Veneer Compound R-4; Redi-Mix R-7; Ferroboard Rings; Ferroboard Liner.

Armco Steel, Middletown, OH: Redi-Mix R-2 compounds and Ferroboard.

Jones & Laughlin Steel, Youngstown, OH: Ferroboard; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2 Compounds; Redi-Mix R-3 Compounds and Veneer Compounds R-5.

Jones & Laughlin Steel, Cleveland, OH: Ferroseal Gaskets; Ferroboard Liners and Ferroboard.

LTV Steel, Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, Jennings Road, Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, East 45th Street, Cleveland, OH: see response for Republic Steel, Cleveland, OH below.

LTV Steel, West Third Street Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, Youngstown, OH: see response for Jones & Laughlin Steel, Youngstown, OH above.

LTV Steel, Briar Hill Works, Youngstown, OH: see response for Jones & Laughlin Steel, Youngstown, OH above.

LTV Steel Campbell Works, Youngstown, OH: Ferroboard; Hot Top Covers; Redi-Mix R-2; Veneer Compound R-4; Veneer Compound R-5.

Republic Steel, Canton, OH: Ferroboard Rings; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2; Redi-Mix R-3 (B-B); Veneer Compound R-4; Veneer Compound R-5; Veneer Compound R-7; V Mix Compound.

Republic Steel, Cleveland, OH: Ferroboard Rings; Hot Top Covers; Ferroboard Liner; Redi-Mix R-2; Veneer Compound R-5.

Republic Steel, Massillon, OH: Redi-Mix R-2 Compounds; Redi-Mix R-3 Compounds; Veneer Compounds R-5.

Republic Steel, Youngstown, OH: Ferroboard; Ferroboard Covers; Redi-Mix R-2 Compounds; Veneer Compounds R-5.

The Timken Company, a.k.a. Timken Roller Bearing, Canton, OH: Ferroboard Rings; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2 Compounds; Redi-Mix R-3 (B-B) Compounds; Veneer Compound R-4; Veneer Compound R-5.

The Timken Company, a.k.a. Timken Roller Bearing, Dueber Avenue, Canton, OH: See response to The Timken Company, a.k.a. Timken Roller Bearing, Canton, OH above.

U.S. Steel, Ohio Works, Youngstown, OH: Ferroboard, Hot Top Covers, Veneer Compound R-4; Veneer Compound R-5.

U.S. Steel, Homestead, PA: Ferroboard Rings; Ferroboard Gaskets; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2; Redi-Mix-Special; Veneer Compound R-5; Veneer Compound R-5-B

Weirton Steel, Weirton, WV: Ferroboard

Wheeling-Pitt Steel, South Plant (Mingo Junction): Ferroboard.

Wheeling-Pitt Steel, North Plant (Steubenville): Ferroboard.

Wheeling-Pitt Steel, Monessen, PA: Ferroboard Liner; Ferroboard; Hot Top Covers; Redi-Mix R-2; Veneer Compound R-4; Veneer Compound R-5; Ferroboard Rings.

Youngstown Sheet & Tube, Youngstown, OH: Ferroboard;
Ferroboard Liners; Hot Top Covers; Redi-Mix R-2
Compounds; Redi-Mix R-3 Compounds and Veneer Compounds
R-5.

Defendant did not sell any asbestos-containing products to
any other worksite listed on plaintiff's Exhibit A.

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

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other
company;
- (c) The name of the person at each other company with whom
Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing
products that you marketed, distributed, installed,
and/or sold to each such company from 1950 to 1974.
- (e) Please identify all documents relating to the sales to
each such company.

RESPONSE TO INTERROGATORY NO. 8.2:

- (a) Ferro Engineering Division of Oglebay Norton Company,
1100 Superior Avenue, Cleveland, OH 44114-2598
- (b) Armco Steel, Ashland, KY: 1951-1963; 1965-1967.
Armco Steel, Houston, TX: 1948-1979.
Armco Steel, Middletown, OH: 1952-1957; 1969-1972.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Defendant Oglebay Norton Company's Supplemental Responses to Plaintiffs Master Set of Interrogatories* has been served upon the following via DHL Express mail, postage prepaid, this 2nd day of December, 1997:

STEVEN D WOLENS
LADD GIBKE
BARON & BUDD
THE CENTRUM SUITE 1100
3102 OAK LAWN AVENUE
DALLAS, TX 75219

and

BRUCE CARTER, ESQ.
43-B New Garver Road
Monroe, Ohio 45050

Attorneys for Plaintiffs

A notice of same has been forwarded this date to all defense counsel of record via regular U.S. mail.


REGINA M. MASSETTI 00254754/Conner

Attorney for Defendant
Ferro Engineering Division of
Oglebay Norton Company

Company, a.k.a. Timken Roller Bearing, Canton, OH
above.

U.S. Steel, Ohio Works, Youngstown, OH: 1956-1973.

U.S. Steel, Homestead, PA: 1948-1976.

Weirton Steel, Weirton, WV: 1968-1973.

Wheeling-Pitt Steel, South Plant (Mingo Junction):
1968.

Wheeling-Pitt Steel, North Plant (Steubenville): 1968-
1971.

Wheeling-Pitt Steel, Monessen, PA: 1949-1973.

Youngstown Sheet & Tube, Youngstown, OH: 1950-1974.

- (c) Defendant does not know the identity of the person(s)
at these locations with whom Ferro Engineering Division
of Oglebay Norton Company primarily dealt.
- (d) Defendant has copied and produced all In-Road Books for
the worksites identified in plaintiff's Exhibit A where
defendant sold asbestos-containing products. All
information requested in this interrogatory is
contained therein.

- (e) See response to Interrogatory 8.2(d).

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

RESPONSE TO INTERROGATORY NO. 16: All the asbestos-containing products identified in Response to Interrogatory No. 5 were manufactured to customer specification and therefore, it would be unlikely that dust would be created in the installation process. Research indicates that the asbestos contained in all products, when subjected to the temperatures reached in the ingot producing process becomes forsterite. The exception would be Redi-Mix/Veneer Compound which might create dust in the mixing process.

INTERROGATORY NO. 30.2: Has any engineer, industrial hygienist or physician in your employ been a member in any professional group, trade group or any of the following groups:

- Asbestos Textile Institute
- National Insulation Manufacturers Association
- Thermal Insulation Manufacturers Association
- Quebec Asbestos Mining Association
- Asbestos Information Association
- Industrial Health Foundation
- Industrial Hygiene Foundation
- Iron and Steel Institute
- National Safety Counsel
- Refractories Institute
- Air Hygiene Foundation of America, Inc.
- Sprayed Mineral Fiber Association

If the answer is yes, state the following:

- (a) The name of the group or groups in which the individual(s) were members;
- (b) The name and position individual(s) within the Defendant, as defined, who were members;
- (c) The years the individual(s) were members of the groups;

- (d) Whether the Defendant paid the individual(s) dues or membership fees or reimbursed the individual(s) for dues or membership fees in the group.

RESPONSE TO INTERROGATORY NO. 30.2: (a). Defendant belonged to the Iron and Steel Institute.

- (c) Date of first membership is unknown, however, defendant presently belongs to this institute.

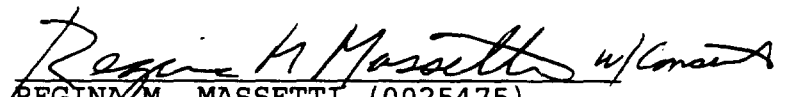
- (d) Defendant pays dues to the institute.

Defendant did not belong to any other professional or trade group or to any group listed in Interrogatory No. 30.2.

INTERROGATORY NO. 56: Does Defendant have policies of insurance that might cover the claims that have been made by the Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

RESPONSE TO INTERROGATORY NO. 56: Defendant alleges it has coverage with Fireman's Fund Insurance Company, Marine Office of America Corporation, Hartford Insurance Company and the London Market Insurers. Defendant and its carriers are in the process of negotiating coverage issues. Defendant will supplement this interrogatory once negotiations conclude.


REGINA M. MASSETTI (0025475)
Law Offices of Regina M. Massetti
Attorney for Defendant
Ferro Engineering Division of
Oglebay Norton Company

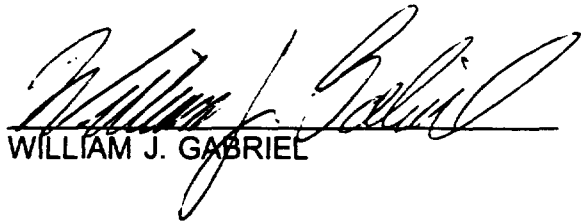

By  R. J. Goshall

STATE OF OHIO

COUNTY OF CUYAHOGA

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)
SS: VERIFICATION

WILLIAM J. GABRIEL, being a retired employee and duly authorized agent for Ferro Engineering, Division of Oglebay Norton Company, and after having first been sworn according to law deposes and states that the answers to the foregoing interrogatories are true as he verily believes.


WILLIAM J. GABRIEL

SWORN TO BEFORE ME and subscribed in my presence by William J. Gabriel
this 2nd day of December, 1997.

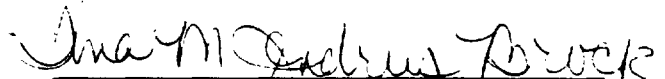

Tina M. Jendrus Brock
Notary Public - State of Ohio
My Commission Expires 10/06/00

EXHIBIT A

Ferroboard Rings - This product was used in the hot top system. The ring would be attached to the hot top casting and inserted into a mold to form a seal between the inner surface of the mold and the casting.

Ferroseal Gaskets - This product was used with the superimposed system. Its purpose was to fill the space between the hot top and the ingot mold.

Ferroboard - This product was used to line the ingot molds. The board was custom designed to fit different types of molds and may have had crease lines for folding the board into the proper shape. It may have been held in place by clips or hangers and was a one use only product.

Ferroboard Liner - This product was used in an insulating system and was only used in a cast iron hot top or superimposed hot top system.

Hot Top Covers - Hot Top Covers are a custom designed box designed to fit the top of the Hot Top. They are an exothermic and insulation cover packaged in box form with a thin steel plate separating the exothermic layer from the insulating layers. Hot Top Covers were made to mold specifications and placed on top of the mold and/or hot top castings.

Redi-Mix and Veneer Compounds - Redi-mix was a cement type veneer compound applied over firebricks or castables and served as a parting compound. The redi-mix and/or veneer compounds were mixed with water and troweled or sprayed to the inside of a hot top.

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	:	(HANNA, J.)
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	:	IN RE: ALL BARON & BUDD
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	:	
A-BEST PRODUCTS COMPANY, et	:	
al.,	:	
	:	
Defendants.	:	

DEFENDANT OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIV.'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS
MASTER SET OF INTERROGATORIES

INTERROGATORY NO. 5: Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
1. The trade or brand name
 2. Its identification number (model, serial number, etc.).
 3. The time period it was manufactured, mined, marketed, distributed or sold.
 4. Its physical description including color, general composition, and form.
 5. A detailed description of its intended use and purpose.

6. A detailed description of the type of package in which it was sold, listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.
7. The percent of asbestos which it contained.
8. The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite).

RESPONSE TO INTERROGATORY NO. 5:

3. Asbestos-containing products were manufactured, marketed, or sold from 1947-1974.
4. See attached Exhibit "A".
5.
 - i. Hot Top Cover - This product was a custom-designed box, designed to fit the top of a Hot Top. It was an exothermic (heat generator) and insulation cover packaged in box form with a thin steel plate separating the exothermic layer from the insulating layer.
 - ii. Ferroboard - This product was used to line ingot molds. The board was custom designed to fit different types of molds.
 - iii. Ferrobcard Liner - This product was used to line Hot Top castings and was custom designed to fit different types of Hot Top castings.
 - iv. Redi-Mix/Veneer Compound - This product was a cement-type veneer compound applied over

firebricks or castables and served as a parting compound. Redi-Mix/Veneer Compound were mixed with water and troweled or sprayed onto the inside of a Hot Top.

v. Ferroboard Rings - This product was designed to protect the bottom of a Hot Top casting and formed the shoulder of an ingot.

vi. Ferroseal Gaskets - This product was a soft, spongy type material used in conjunction with Ferroboard Liners.

7 & 8. i. Hot Top Covers contained approximately 20% chrysotile asbestos by weight.

ii. Ferroboard contained approximately 5% amosite asbestos or chrysotile asbestos by weight depending upon customer specifications.

iii. Ferroboard Liners contained approximately 5% amosite asbestos or chrysotile asbestos by weight depending upon customer specifications.

iv. Redi-Mix Veneer Compound contained approximately 2% chrysotile asbestos by weight.

v. Ferroboard Rings contained approximately 5% amosite asbestos by weight.

vi. Ferroseal Gaskets contained approximately 5% amosite.

IN THE COURT OF COMMON PLEAS
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	:	(HANNA, J.)
Plaintiffs,	:	
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al.,	:	
	:	
Defendants.	:	

DEFENDANT OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIV.'S
RESPONSES TO PLAINTIFFS MASTER SET OF INTERROGATORIES

GENERAL OBJECTION

These responses are based on facts known or believed to be true by Defendant, Oglebay Norton Company at the time of answering these interrogatories. Much of the information requested dates back many years and is difficult or impossible to reconstruct or retrieve. This Defendant, therefore, reserves the right to amend these responses as and if new or better information is discovered.

This Defendant objects to these interrogatories insofar as they seek information which is subject to the attorney client or attorney work product privileges or which is otherwise not discoverable under the provisions of the Ohio Rules of Civil Procedure.

This Defendant further objects to these interrogatories insofar as they seek production of any information consisting of a trade secret, confidential financial data or other confidential research, development or commercial information. This Defendant further objects to these interrogatories insofar as they call for

responses that are not relevant to the time period during which or the location at which Plaintiff worked. These interrogatories are, therefore, irrelevant, overly broad and burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to these general objections and to any objections stated in the answers to the interrogatories, this Defendant has answered these interrogatories as they pertain to Oglebay Norton during the relevant time periods and for the relevant locations.

INTERROGATORY NO. 1: For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include job title, length of time employed by Defendant and a year by year list of all other positions, titles, or jobs held when working for Defendant.

RESPONSE TO INTERROGATORY NO. 1: See General Objections. Subject to the general objections, Oglebay Norton states that the information contained in the responses to these interrogatories has been compiled by the work of several present and former employees over the past 15 years. All information used in answering these interrogatories is in the possession of R. Patrick White, Esq., Oglebay Norton's National Coordinating Counsel who has held this position since September, 1991.

INTERROGATORY NO 1.1: Please identify all documents used, related to, or referred to in connection with the preparation of or answers

to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

ANSWER TO INTERROGATORY NO. 1.1:

Defendant objects to this Interrogatory on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. These interrogatory responses were compiled after a review of numerous documents and the recording of the recollection of various employees and former employees of Ferro.

INTERROGATORY NO. 2: Please state whether or not Defendant is a corporation. If so, please state:

- (a) Your correct corporate name;
- (b) The state of your incorporation;
- (c) The address of your principal place of business;
- (d) Your registered agent for service in the state of Ohio.
- (e) For each Defendant claiming that this Court lacks personal jurisdiction, list year by year the total amount of income received by the Defendant from entities in Ohio, any and all years that Defendant, as defined, has been licensed to do business in Ohio, and any real property owned at any time by Defendant or its present or past subsidiaries.

RESPONSE TO INTERROGATORY NO. 2:

- (a) Oglebay Norton Company.
- (b) Delaware
- (c) 1100 Superior Avenue, Cleveland, OH 44114-2598

(d) John J. Kirn, Jr., Esq.

(e) Not applicable.

INTERROGATORY NO. 3: State Defendant's complete corporate or business history, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs. In addition:

- (a). if defendant or any of its predecessors or subsidiaries at any time purchased, assumed, or in any other manner acquired ANY of the assets and/or liabilities or any corporation or entity at any prior time engaged in any aspect of the placing of asbestos containing products into the stream of commerce or the insuring of asbestos related risks, then please state the following as to each acquisition:
 - (b). the name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
 - (c). the manner by which each such corporation, entity or interest therein, was acquired (e.g., merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
 - (d). the date of each such acquisition;
 - (e). the state in which each such acquisition was effected;

- (f). the state law governing each such acquisition if specified by contract;
- (g). whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (h). identify each document reflecting or related to the history and/or transaction(s) set forth in answer to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 3: Defendant objects to this Interrogatory on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. The Ferro Engineering Company was incorporated on October 9, 1929. The Ferro Engineering Company merged into Columbia Transportation Company, renamed Oglebay Norton Company on October 31, 1957.

INTERROGATORY NO. 4: Please state whether or not the Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liabilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products). If so, please state the following:

- (a). the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;

- (b). the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase or assets or product line);
- (c). the date of each such acquisition;
- (d). the state in which each such acquisition was effected;
- (e). the state law governing each such acquisition if specified by contract;
- (f). whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (g). whether the acquisition concerned asbestos-containing products.

ANSWER TO INTERROGATORY NO. 4: The Ferro Engineering Company was incorporated on October 9, 1929. The Ferro Engineering Company merged into Columbia Transportation Company, renamed Oglebay Norton Company on October 31, 1957. Ferro Engineering Company has designed, manufactured, processed, sold, distributed and patented certain products which are more particularly described in the attached Exhibit "A".

INTERROGATORY NO. 4.1: For each corporation, other than the answering defendant ("the entity"), that has at any time in the past been involved in the placing of asbestos-containing products into the stream of commerce for which officers of the answering defendant's corporation have also served as officers, directors or served in any managerial position while employed by the answering defendant, state:

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

ANSWER TO INTERROGATORY NO. 4.1: Not applicable.

INTERROGATORY NO. 5: Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

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

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

(g) A detailed description of the intended uses.

RESPONSE TO INTERROGATORY NO. 5: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by producing information regarding products as shown on Exhibit "A".

(a) The Ferro Engineering Company (Defendant's predecessor).

(b) 1. See attached Exhibit "A".

2. Ferroboard Rings - (FBR)

Ferroseal Gaskets - (FS)

Ferroboard - (FB or XFB)

Ferroboard Liner - (F)

Hot Top Covers - (C)

Ready Mix/Veneer Compounds - (R or R-1, R-2, or R-4
or R-5)

3. Asbestos-containing products were manufactured, marketed, or sold from 1947-1974.

4. See attached Exhibit "A".
5. See attached Exhibit "A".
6. Ferroboard Rings - Rings were stacked on a wooden pallet. A plastic 6 mil shrink bag was placed over the rings and run through an arch oven which shrunk the bag tight to the product and pallet.

Ferroboard Liners - Same as Ferroboard rings. This liner was put into a large 1/2 regular slotted corrugated carton, 350# wall stitched, which was placed on a wooden pallet and strapped to the pallet.

Ferroseal Gaskets - Same as Ferroboard rings.

Ferroboard - Ferroboard was put into a large corrugated carton or on a wooded pallet-shrink wrapped.

Hot Top Cover - A cover is a diecut corrugated box. The finished cover was put into a large cardboard tray, which was on a wooden pallet. The tray has 2 wraparound corrugated sheets, which enclosed the covers from the sides. It was then capped with a tray and the palletized unit was stapled together.

Ready-Mix and Veneer Compound - This material was packed in a four ply multiwall kraft valve sleeve shipping sack. After filling the sack, it was put on a wooden pallet which had a corrugated sheet on the deckboard. A light application of adhesive was

put between the layers of bags to prevent slippage. Before the valve sleeve bag was in production, the bags were sewed shut and prior to that the bags were closed by using wire tips.

Note: Prior to the use of shrink film bags, plastic bags were used that were loose but were strapped to the pallet.

7. See objection to Interrogatory No. 5 above. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant.
8. See response to Interrogatory 5(b)7 above.
- (c). See response to Interrogatory 5(b)3 above.
- (d). See response to Interrogatory 5(b)7 above. Without waiving such objections, see attached Exhibit "A".
- (e). Ferroseal, Ferroboard liners, Ferroboard ring wipers, redi-mix compound, and hot top covers, bore the trade mark "C&D". Additionally, the Ferro logo may have appeared on some products that were supplied in bags and

the boxed hot top covers may have had the words Ferro Engineering printed on them.

(f). See attached Exhibit "A".

(g). See attached Exhibit "A".

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

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

RESPONSE TO INTERROGATORY NO. 6: See response to Interrogatory No. 5 for objection. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant.

Without waiving the foregoing objections, Defendant responds to this interrogatory that Ferroseal, Ferroboard, Ferroboard liners, Ferroboard ring wipers, Ready-mix and Veneer compounds were patented at various times. The "C&D" Trademark was registered in 1931 with the US Patent Office.

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

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

RESPONSE TO INTERROGATORY NO. 7: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant.

Without waiving the foregoing objections, Defendant responds to this interrogatory by stating in the early 1970s, Ferro hired James Bogнар as Research Manager for the purpose of removing asbestos from its products. Chemical formulations for the products varied between 1971 and June, 1974 when all asbestos was removed from the products.

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

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

RESPONSE TO INTERROGATORY 8: No.

INTERROGATORY NO. 8.01: Has this defendant ever purchased asbestos containing products from any other defendant?

RESPONSE TO INTERROGATORY NO. 8.01: No.

INTERROGATORY NO. 8.02: If the answer to the preceding Interrogatory is yes, please state the following:

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

RESPONSE TO INTERROGATORY NO. 8.02: Not applicable.

INTERROGATORY NO. 8.03: Has this defendant ever sold asbestos containing products to any other defendant?

RESPONSE TO INTERROGATORY NO. 8.03: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by answering no.

INTERROGATORY NO. 8.04: If the answer to the preceding Interrogatory is yes, please state the following:

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

RESPONSE TO INTERROGATORY NO. 8.04: Not applicable.

INTERROGATORY NO. 8.05: Has Defendant engaged in the manufacture and/or sale and/or distribution and/or marketing and/or supply and/or purchase and/or use of non-asbestos-containing products for use in connection with temperatures above 125° Fahrenheit since 1930. If so, please state:

- (a) the date such activity began;
- (b) the years during which such activity took place;
- (c) the date when such activity was terminated;
- (d) if such activity was terminated, the reason(s) why;
- (e) the geographical area into which you claim the product(s) were sold, purchased, or used;
- (f) identify the organization unit of defendant so engaged;
- (g) the site(s) at which each such product was manufactured;
- (h) the material components of each such product, giving specific or approximate percentage both by weight and by volume of each material component of each such product;
- (i) the temperature ranges for which each product(s) was intended to be used;
- (j) the product's generic name;
- (k) the product's trade or brand name;

- (l) the container in which the product was shipped (i.e. paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings which appeared on the product, as well as a description of the package used, the dates that type of package was used, and any logos, product names, trademarks, etc. which appeared on the package;
- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

RESPONSE TO INTERROGATORY NO. 8.05: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this

interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissable evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant. Without waiving the foregoing objection, Defendant responds to this interrogatory by stating that it has sold non-asbestos containing products fitting this description since at least 1942. All products became asbestos free in 1974.

INTERROGATORY NO. 8.06: Did Defendant ever market or distribute any asbestos-containing product manufactured in whole or in part by someone else? If so, please state the following for each such product:

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

RESPONSE TO INTERROGATORY NO. 8.06: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory as follows: No.

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

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

RESPONSE TO INTERROGATORY NO. 8.1: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever

manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, and subject thereto, Defendant responds to this interrogatory by stating

(a) Defendant's response to Interrogatory 8.1 (a) is based upon Defendant's sales records.

(b) **Armco Steel, Ashland, KY:** Ferroboard and Redi-Mix R-2 Compound.

Armco Steel, Houston, TX: Hot Top Covers; Ferroboard; Redi-Mix R-2 compound; Veneer Compound R-4; Redi-Mix R-7; Ferroboard Rings; Ferroboard Liner.

Armco Steel, Middletown, OH: Redi-Mix R-2 compounds and Ferroboard.

Jones & Laughlin Steel, Youngstown, OH: Ferroboard; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2 Compounds; Redi-Mix R-3 Compounds and Veneer Compounds R-5.

Jones & Laughlin Steel, Cleveland, OH: Ferroseal Gaskets; Ferroboard Liners and Ferroboard.

LTV Steel, Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, Jennings Road, Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, East 45th Street, Cleveland, OH: see response for Republic Steel, Cleveland, OH below.

LTV Steel, West Third Street Cleveland, OH: see response for Jones & Laughlin Steel, Cleveland, OH above.

LTV Steel, Youngstown, OH: see response for Jones & Laughlin Steel, Youngstown, OH above.

LTV Steel, Briar Hill Works, Youngstown, OH: see response for Jones & Laughlin Steel, Youngstown, OH above.

LTV Steel Campbell Works, Youngstown, OH: Ferroboard; Hot Top Covers; Redi-Mix R-2; Veneer Compound R-4; Veneer Compound R-5.

Republic Steel, Canton, OH: Ferroboard Rings; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2; Redi-Mix R-3 (B-B); Veneer Compound R-4; Veneer Compound R-5; Veneer Compound R-7; V Mix Compound.

Republic Steel, Cleveland, OH: Ferroboard Rings; Hot Top Covers; Ferroboard Liner; Redi-Mix R-2; Veneer Compound R-5.

Republic Steel, Massillon, OH: Redi-Mix R-2 Compounds; Redi-Mix R-3 Compounds; Veneer Compounds R-5.

Republic Steel, Youngstown, OH: Ferroboard; Ferroboard Covers; Redi-Mix R-2 Compounds; Veneer Compounds R-5.

The Timken Company, a.k.a. Timken Roller Bearing, Canton, OH: Ferroboard Rings; Ferroboard Liners; Hot Top Covers;

Redi-Mix R-2 Compounds; Redi-Mix R-3 (B-B) Compounds;
Veneer Compound R-4; Veneer Compound R-5.

The Timken Company, a.k.a. Timken Roller Bearing, Dueber
Avenue, Canton, OH: See response to The Timken Company,
a.k.a. Timken Roller Bearing, Canton, OH above.

U.S. Steel, Ohio Works, Youngstown, OH: Ferroboard, Hot
Top Covers, Veneer Compound R-4; Veneer Compound R-5.

U.S. Steel, Homestead, PA: Ferroboard Rings; Ferroseal
Gaskets; Ferroboard Liners; Hot Top Covers; Redi-Mix R-2;
Redi-Mix-Special; Veneer Compound R-5; Veneer Compound R-
5-B

Weirton Steel, Weirton, WV: Ferroboard

Wheeling-Pitt Steel, South Plant (Mingo Junction):
Ferroboard.

Wheeling-Pitt Steel, North Plant (Steubenville):
Ferroboard.

Wheeling-Pitt Steel, Monessen, PA: Ferroboard Liner;
Ferroboard; Hot Top Covers; Redi-Mix R-2; Veneer Compound
R-4; Veneer Compound R-5; Ferroboard Rings.

Youngstown Sheet & Tube, Youngstown, OH: Ferroboard;
Ferroboard Liners; Hot Top Covers; Redi-Mix R-2
Compounds; Redi-Mix R-3 Compounds and Veneer Compounds R-
5.

INTERROGATORY 8.2: For each company or business that Defendant
knows may have marketed, distributed, installed, and/or sold, those

products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A.

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from 1950 to 1974.
- (e) Please identify all documents relating to the sales to each such company.

RESPONSE TO INTERROGATORY NO. 8.2: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory as follows:

- (a) Ferro Engineering Division of Oglebay Norton Company,
1100 Superior Avenue, Cleveland, OH 44114-2598
- (b) Armco Steel, Ashland, KY: 1951-1963; 1965-1967.
Armco Steel, Houston, TX: 1948-1979.
Armco Steel, Middletown, OH: 1952-1957; 1969-1972.
Jones & Laughlin Steel, Youngstown, OH: 1950-1974.
Jones & Laughlin Steel, Cleveland, OH: 1967-1974.
LTV Steel, Cleveland, OH: see response for Jones &
Laughlin Steel, Cleveland, OH above.
LTV Steel, Jennings Road, Cleveland, OH: see response for
Jones & Laughlin Steel, Cleveland, OH above.
LTV Steel, East 45th Street, Cleveland, OH: see response
for Republic Steel, Cleveland, OH below.
LTV West Third Street Cleveland, OH: see response for
Jones & Laughlin Steel, Cleveland, OH above.
LTV Steel, Youngstown, OH: see response for Jones &
Laughlin Steel, Youngstown, OH above.
LTV Steel, Briar Hill Works, Youngstown, OH: see response
for Jones & Laughlin Steel, Youngstown, OH above.
LTV Steel Campbell Works, Youngstown, OH: 1950-1975.
Republic Steel, Canton, OH: 1948-1974.
Republic Steel, Cleveland, OH: 1948-1973.
Republic Steel, Massillon, OH: 1948-1960.
Republic Steel, Youngstown, OH: 1948-1956; 1959; 1965-
1967.

The Timken Company, a.k.a. Timken Roller Bearing, Canton, OH: 1948-1978.

The Timken Company, a.k.a. Timken Roller Bearing, Dueber Avenue, Canton, OH: see response to The Timken Company, a.k.a. Timken Roller Bearing, Canton, OH above.

U.S. Steel, Ohio Works, Youngstown, OH: 1956-1973.

U.S. Steel, Homestead, PA: 1948-1976.

Weirton Steel, Weirton, WV: 1968-1973.

Wheeling-Pitt Steel, South Plant (Mingo Junction): 1968.

Wheeling-Pitt Steel, North Plant (Steubenville): 1968-1971.

Wheeling-Pitt Steel, Monessen, PA: 1949-1973.

Youngstown Sheet & Tube, Youngstown, OH: 1950-1974.

- (c) Defendant does not know who was the person at these locations with whom Ferro Engineering Division of Oglebay Norton Company primarily dealt.
- (d) See response to Interrogatory 8.1 (b).
- (e) Sales records are in the possession of the National Coordinating Counsel for OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIVISION.

INTERROGATORY NO. 8.3: If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed,

distributed, and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of these companies, please state the following:

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

RESPONSE TO INTERROGATORY 8.3: See response to Interrogatory 8.2

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

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

RESPONSE TO INTERROGATORY 8.4: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this

defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory as follows:

- (a) William J. Gabriel, Joseph Hudik and Dennis Hargreaves.
Last known address: 1100 Superior Avenue, Cleveland, OH
44114-2598
- (b) The sales records are in the possession of the National Coordinating Counsel for OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIVISION.

INTERROGATORY NO. 9: Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

- (a) The name and last known address of each such representative and whether they are still employed by Defendant;
- (b) The period of time they acted as your representative;
- (c) Their general responsibility as to each facility; and
- (d) Whether that person is still alive.
- (e) Any documents relating, referring or pertaining thereto.

RESPONSE TO INTERROGATORY NO. 9: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by stating that Defendant does not know the names of the sales representatives who called on the sites listed in Exhibit A during the period 1945 to 1975. Defendant will supplement this response to interrogatory when said information is discovered.

INTERROGATORY NO. 9.1: Identify all managers and sales personnel responsible for your sales or installation of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

RESPONSE TO INTERROGATORY NO. 9.1: Defendant objects to this interrogatory on the basis that it is overly broad and burdensome in that it covers a time period spanning in excess of 60 years and is not restricted to facilities to which Defendant supplied asbestos containing products. Without waiving said objection

Defendant responds as follows: Persons who may have knowledge of sales to sites in question include William J. Gabriel, Joseph Hudik, Dennis Hargreaves, J.D. Dublo, John Tooey, Michael Palovich, Peter Cochran, Lou Marchetti, Lowell Cochran, Richard G. Miller, and Thomas Croyle.

INTERROGATORY NO. 10: Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products? If so, please state:

- (a) The name of each subdivision;
- (b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and
- (c) Whether said division or subsidiary conducted such business at any of the sites listed on Exhibit A, from 1940 to 1975? If so, please state the following as to each job site listed on Exhibit A:
 - (1) The dates of such contracts;
 - (2) The specific asbestos-containing products that were used or removed in each contract.

RESPONSE TO INTERROGATORY NO. 10: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this

defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by stating that Defendant did not have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products.

INTERROGATORY NO. 11: Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

RESPONSE TO INTERROGATORY NO. 11: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this

interrogatory by stating that Defendant did not ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory.

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

RESPONSE TO INTERROGATORY NO. 12: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by as follows: 3155 East 66th Street Cleveland, OH (approximately 1930 - 1974); 3313 East 80th Street, Cleveland, OH (approximately 1939 - 1974).

INTERROGATORY NO. 13: Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

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

RESPONSE TO INTERROGATORY NO. 13: No.

INTERROGATORY NO. 13.1: Have you ever owned or operated a business or portion thereof which engaged in construction, erection or tear out of furnaces, pipes, boilers, turbines, lehrs, ovens, kilns, etc.? If so, please state:

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

- (f) provide the dates for the applicable construction, installation or tear-out project.

RESPONSE TO INTERROGATORY NO. 13.1: No.

INTERROGATORY NO. 13.2: Do you have within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;
- (b) the present location and custodian of each such package;
- (c) the date or approximate date on which each such package was produced.

RESPONSE TO INTERROGATORY NO. 13.2: No.

INFORMATION ABOUT DESIGN/TESTING

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

RESPONSE TO INTERROGATORY NO. 14: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this

defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant. Without waiving the foregoing objections, Defendant responds to this interrogatory by stating that in the mid-1970's, Ferro Engineering Division of Oglebay Norton Company began to research and develop an asbestos-free product line at the request of a customer. James Bognar, Manager of Research at Ferro Engineering, was in charge of the research and development of this product line. Mr. Bognar is deceased.

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

RESPONSE TO INTERROGATORY NO. 15: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome

in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant. Without waiving the foregoing objections, Defendant responds to this interrogatory by referring to Exhibit "A".

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

RESPONSE TO INTERROGATORY NO. 16: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts

alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant.

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

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

RESPONSE TO INTERROGATORY 17: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers that

- (a) blueprints, inroad books and other various documents exist.
- (b) These documents are in the possession of the National Coordinating Counsel for OGLEBAY NORTON COMPANY/FERRO ENGINEERING DIV.
- (c) See response to section (b) above.

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

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

RESPONSE TO INTERROGATORY NO. 18: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

INTERROGATORY NO. 18.1: Prior to releasing any products for sale and usage (whether asbestos-containing or not), were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

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

RESPONSE TO INTERROGATORY NO. 18.1: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

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

- (a) Identify each such written material or document;

(b) Identify each person who presently has possession of each such document;

(c) State where each such document is located?

RESPONSE TO INTERROGATORY NO. 19: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence.

Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

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

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

RESPONSE TO INTERROGATORY NO. 20: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

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

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

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

RESPONSE TO INTERROGATORY NO. 21: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

INTERROGATORY NO. 22: Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

- (a) The dates and nature of such studies;

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

RESPONSE TO INTERROGATORY NO. 22: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Defendant further objects to this interrogatory as it seeks proprietary information regarding product composition. Without waiving the foregoing objections, and subject thereto, defendant answers: No.

INFORMATION ABOUT SAFETY

INTERROGATORY NO. 23: Before placing in the market the asbestos-containing products that Defendant mined, manufactured, sold, marketed, installed, or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

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

RESPONSE TO INTERROGATORY NO. 23: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant answers no.

INTERROGATORY NO. 24: Please state whether or not Defendant ever conducted or caused to be conducted any tests in the field (where asbestos-containing products were applied, removed or utilized) to determine the nature and extent of asbestos dust and/or fiber

exposure to insulators, applicators, fellow employees, or other workers removing and/or tearing out asbestos-containing products, and/or other workers in the vicinity thereof? If so, please identify:

- (a) The date, place and nature of each and every test;
- (b) The particular asbestos-containing products to which each test applied;
- (c) The results of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site; and,
- (d) The persons to whom the results of said tests were given and the date of such dissemination.

RESPONSE TO INTERROGATORY NO. 24: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by answering no.

INTERROGATORY NO. 25: Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

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

RESPONSE TO INTERROGATORY NO. 25: To the best of this Defendant's recollection it first learned that inhalation or ingestion of asbestos fibers posed a potential health hazard to asbestos miners in the late 1960's or early 1970's. Defendant does not recall how it first became aware of this potential hazard. Subsequent to the acquisition of this knowledge, Defendant began the process of conducting research and development to reformulate its products to remove asbestos therefrom. Defendant has no knowledge nor does it

maintain any records pertaining to when such information became known to any specific employee or shareholder.

INTERROGATORY NO. 26: Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma, lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

RESPONSE TO INTERROGATORY NO. 26: To the best of this Defendant's recollection it first learned that inhalation or ingestion of asbestos fibers posed a potential health hazard to asbestos miners in the late 1960's or early 1970's. Defendant does not recall how it first became aware of this potential hazard. Subsequent to the acquisition of this knowledge, Defendant began the process of conducting research and development to reformulate its products to remove asbestos therefrom. Defendant did not conduct tests to investigate the relationship of the abovementioned illnesses and the inhalation of asbestos dust and/or fibers.

INTERROGATORY NO. 27: Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by the Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

RESPONSE TO INTERROGATORY NO. 27: None.

INTERROGATORY NO. 28: As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

RESPONSE TO INTERROGATORY NO. 28: None.

INTERROGATORY NO. 29: Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

RESPONSE TO INTERROGATORY NO. 29: None.

INTERROGATORY NO. 30: Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 and 1975.

RESPONSE TO INTERROGATORY NO. 30: None.

INTERROGATORY NO. 30.1: Please state whether Defendant, its medical officer or industrial hygienist or medical consultant or physicians were ever involved in testing or received literature or correspondence from the Mellon Institute.

RESPONSE TO INTERROGATORY NO. 30.1: No.

INTERROGATORY NO. 30.2: Has any engineer, industrial hygienist or physician in your employ been a member in any professional group, trade group or any of the following groups:

Asbestos Textile Institute
National Insulation Manufacturers Association
Thermal Insulation Manufacturers Association
Quebec Asbestos Mining Association
Asbestos Information Association
Industrial Health Foundation
Industrial Hygiene Foundation
Iron and Steel Institute
National Safety Counsel
Refractories Institute
Air Hygiene Foundation of America, Inc.
Sprayed Mineral Fiber Association

If the answer is yes, state the following:

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

RESPONSE TO INTERROGATORY NO. 30.2: (a). Defendant belonged to the Iron and Steel Institute.

(c) Date of first membership is unknown, however, defendant presently belongs to this institute.

(d) Defendant pays dues to the institute.

INTERROGATORY NO. 31: State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were

exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 31: None.

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

RESPONSE TO INTERROGATORY NO. 32: Not Applicable.

INTERROGATORY NO. 33: Please state the year that Defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee/official of the company receiving such advice.

RESPONSE TO INTERROGATORY NO. 33: Defendant does not recall when it first learned of any alleged threshold limit values or maximum allowable concentrations of both asbestos dust and total dust. To the best of its recollection, it learned of these values sometime after it became involved in asbestos litigation in the 1980's.

INTERROGATORY NO. 33.1: State whether this defendant at any time caused to be conducted on any job site, any air sampling, dust counts, tests or other activities to determine air quality or worker safety. If your answer is in the affirmative, please indicate:

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

- (c) where such activities were performed;
- (d) the results of any such activities.

RESPONSE TO INTERROGATORY NO. 33.1: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by answering no.

INTERROGATORY NO. 34: Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

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

RESPONSE TO INTERROGATORY NO. 34: No.

INTERROGATORY NO. 35: Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.

RESPONSE TO INTERROGATORY NO. 35: No.

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

RESPONSE TO INTERROGATORY NO. 36: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome and not designed to lead to the discovery of relevant and admissible evidence. Without waiving this objection, Defendant would respond that the publication listed in this interrogatory is not related to the industry in which Ferro Engineering Division of Oglebay Norton Company is engaged in business; to wit, the steel industry. Defendant does not believe that it was aware of this publication prior to its becoming involved in asbestos related litigation during the 1980's.

INTERROGATORY NO. 36.1: Did you ever contract with Saranac Laboratories to study the hazards of any dust producing product manufactured by you (whether asbestos containing or not)? If so,

identify by date and author all documents concerning or any way related to such study.

RESPONSE TO INTERROGATORY NO. 36.1: No.

INTERROGATORY NO. 36.2: Did you ever contract with Saranac Laboratories to analyze dust or products? If so, identify by date and author all documents concerning or any way related to such analysis.

RESPONSE TO INTERROGATORY NO. 36.2: No.

INTERROGATORY NO. 37: Please state whether the Defendant at any time has been a member of any "trade organization" or "trade association" composed by other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

RESPONSE TO INTERROGATORY NO. 37: Defendant belongs to the American Iron and Steel Institute, 1101 17th Street, N.W., Suite 1300, Washington, DC 20036.. The date of first membership is unknown, however, Defendant currently belongs to this institute. Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome and not designed to lead to the discovery of relevant and admissible evidence. Without waiving this objection, a list of publications issued by the American Iron and Steel Institute can be obtained from the institute.

INTERROGATORY NO. 38: With respect to each trade organization or association listed in answer to Interrogatory No. 37, please state

whether the minutes of the group's meetings and any correspondence between the members of such group's concerning the hazards of asbestos exposure are available.

RESPONSE TO INTERROGATORY NO. 38: To the best of this defendant's knowledge no issues related to asbestos exposure were ever discussed. Defendant would refer Plaintiff to the Iron and Steel Institute which has more accurate records of the minutes of the group meetings and correspondence between members of the group.

INTERROGATORY NO. 39: Please identify by name the technical and trade association periodicals to which the Defendant subscribed, and state whether Defendant had knowledge of any articles being printed, or withheld from printing, in said periodicals pertaining to the potential hazards of asbestos. If so, please state the following:

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

RESPONSE TO INTERROGATORY NO. 39: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome and not designed to lead to the discovery of relevant and admissible evidence. The interrogatory asks for each and every journal, periodical, magazine and publication of whatever nature

ever received by Defendant for a period in excess of 67 years. It is an unreasonable and unnecessary burden to require Defendant to review its records in order to respond to this interrogatory. Furthermore, Defendant has no knowledge of decisions made by the editors of these journals to withhold articles from publication. Without waiving this objection, Defendant would respond that it does not believe that it was aware of any articles pertaining to the potential hazards of asbestos prior to its becoming involved in asbestos related litigation during the 1980's.

INTERROGATORY NO. 40: Please state whether, prior to 1975, the Defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

RESPONSE TO INTERROGATORY NO. 40: No.

WARNINGS/SALES PROMOTION

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

- (a) The name of each relevant product;

- (b) The wording of each such warning;
- (c) A description of each such printed material;
- (d) The method used to distribute the warning to persons who are likely to use the products;
- (e) The date each such warning was issued;
- (f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
- (g) Please attach a copy of the warning and date such warning was issued;
- (h) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

RESPONSE TO INTERROGATORY NO. 41: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the

interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by stating that it is believed that at some point in time Defendant placed upon some of its products the following label "Caution contains asbestos fibers - avoid creating dust - breathing asbestos dust may cause serious bodily harm." It is believed that the color of the warning was in red and that the warning was approximately 2 inches by 2 inches in size. There is no record of the dates of use of the warning. R. Patrick White, Esq., LAW OFFICES OF WHITE & BAKER, One Market, Spear Street Tower, 8th Floor, San Francisco, CA 94105 presently has possession of copies of these warning labels.

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

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

RESPONSE TO INTERROGATORY NO. 42: Defendant objects to this interrogatory as it seeks information regarding products over a time period that is not relevant to plaintiff's lawsuit and for

locations at which plaintiffs did not work and it is therefore unduly burdensome, oppressive and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, and subject thereto, this defendant states that Defendant published sales catalogs which are in the possession of its National Coordinating Counsel. Defendant also conducted a limited program of advertisement in steel related publications including but not limited to "Metal 33". Defendant does not possess any chronological history of such advertisement. It is unknown who prepared the sales and advertising materials.

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

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

RESPONSE TO INTERROGATORY NO. 43: Defendant objects to this interrogatory as it seeks information regarding products over a time period that is not relevant to plaintiff's lawsuit and for locations at which plaintiffs did not work and it is therefore unduly burdensome, oppressive and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, and subject thereto, this defendant states that some information about the use of the products listed in answer to Interrogatory No. 5 was contained in the sales catalogs and advertisements referred to in the Response to Interrogatory No. 42. These documents are in the possession of its National Coordinating Counsel. Defendant does not possess any chronological history of such advertisements and written materials.

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

- (a) Identify the written material by content and date;
- (b) To whom was it delivered.

RESPONSE TO INTERROGATORY NO. 44: Unknown at present. Discovery is continuing.

INTERROGATORY NO. 45: Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or applying same? If so, please state the following:

- (a) The date that Defendant first determined that another product could be used in place of asbestos;
- (b) The chemical of the substitute;
- (c) Whether the substitute is suitable for the purpose for which they are to be used;
- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

RESPONSE TO INTERROGATORY NO. 45: Defendant believes that this interrogatory calls for a medical conclusion. Defendant is not a medical corporation and therefore has no opinion in this regard.

In the early to mid-1970's, Ferro Engineering Division of Oglebay Norton began to research and develop an asbestos-free product line at the request of a customer. Defendant did not market asbestos-containing products after 1974. Subsequent to the cessation of the manufacture of asbestos containing products by Defendant, Defendant has become aware that the asbestos contained in Defendant's products, when subjected to the heat of the steel making process, becomes forsterite. Defendant understands that forsterite does not bear the alleged characteristics of asbestos.

INTERROGATORY NO. 46: Did Defendant give any warnings to any individuals at the sites listed on Exhibit A, including any individuals who owned, operated, or managed the facilities at the sites listed on Exhibit A, regarding the potential health hazards

of any product listed in response to Interrogatory No. 5. If yes, please state:

- (a) Name of person most knowledgeable about this communication.
- (b) Name of person at the sites listed on Exhibit 1, attached hereto, most knowledgeable about this communication.
- (c) Dates of each communication.
- (d) Contents of each communication.

RESPONSE TO INTERROGATORY NO. 46: At some point in time Defendant placed upon some of its products the following label "Caution contains asbestos fibers - avoid creating dust - breathing asbestos dust may cause serious bodily harm." It is believed that the color of the warning was in red and that the warning was approximately 2 inches by 2 inches in size. There is no record of the dates of use of the warning. Discovery is continuing as to the names of persons at the sites listed in Exhibit 1 most knowledgeable about these communications.

INTERROGATORY NO. 47: Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
 - (b) The disease alleged in each such claim;
 - (c) A brief summary of the disposition of each such claim;
- and

- (d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

RESPONSE TO INTERROGATORY NO. 47: None.

INTERROGATORY NO. 47.1: Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 47.1: In the mid-1970's, Ferro Engineering Division of Oglebay Norton Company began to research and develop an asbestos-free product line at the request of a customer. James Bogнар, Manager of Research at Ferro Engineering, was in charge of the research and development of this product line. Mr. Bogнар is deceased. Ferro began manufacturing asbestos free products in 1972 and ceased using asbestos in 1974. It is not aware of any documents recording these events.

INTERROGATORY NO. 47.2: Has any person or company from which you purchased asbestos containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

RESPONSE TO INTERROGATORY NO. 47.2: No.

INTERROGATORY NO 47.3: State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

RESPONSE TO INTERROGATORY NO. 47.3: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. This defendant further objects that, to the extent that this interrogatory seeks detailed information concerning the composition of the defendant's products, this interrogatory is overly broad in that it seeks information which is neither relevant or reasonably calculated to lead to the discovery of admissible evidence, it is unduly burdensome and oppressive, and it seeks information which is proprietary in nature which constitute the trade secrets of this defendant. Without waiving the foregoing objections, Defendant responds to this interrogatory by stating that in the mid-1970's, Ferro Engineering Division of Oglebay Norton Company began to research and develop an asbestos-free product line at the request

of a customer. James Bogнар, Manager of Research at Ferro Engineering, was in charge of the research and development of this product line. Mr. Bogнар is deceased.

INTERROGATORY NO. 47.4: State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;
- (b) state when such action was taken;
- (c) state what written material exists related to such action;
- (d) state the names, job titles and last known address of the individuals who undertook such actions.

RESPONSE TO INTERROGATORY NO. 47.4: See response to Interrogatory Number 47.3. Defendant is not aware of any documents recording these events.

INTERROGATORY NO. 48: Did Defendant receive notice prior to 1968 that any person was claiming injury as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;

- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney representing the individuals making such claims;
- (f) The style and court number of each such claim;
- (g) The resolution of each claim.

RESPONSE TO INTERROGATORY NO. 48: None.

INTERROGATORY NO. 48.1: Describe the method by which you have maintained records concerning the manufacture, sale, supply, distribution, use, advertising, delivery, and/or installation or tear-out of each of asbestos-containing products. For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g. boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacturer, sale, supply, distribution, use, advertising, delivery, and/or installation or tear-out which such record keeping system covers;
- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

RESPONSE TO INTERROGATORY NO. 48.1: Defendant maintains inroad sales books. The burden of deriving the information sought by this interrogatory is equal for Plaintiff as for Defendant. Accordingly, will produce its business records to Plaintiff in response to this interrogatory at a date, place and time to be mutually agreed upon by counsel.

INTERROGATORY NO. 48.2: State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each such employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

RESPONSE TO INTERROGATORY NO. 48.2: In the normal course of business far in excess of 100 years, Defendant has routinely discarded obsolete non-essential records.

INTERROGATORY NO. 48.3: For all documents, other than invoices, work orders, and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, work processing or other computerized format)?

(e) What manner of electronic format is used?

RESPONSE TO INTERROGATORY NO. 48.3: None.

INTERROGATORY NO. 48.4: For all invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, work processing or other computerized format)?
- (e) What manner of electronic format is used?

RESPONSE TO INTERROGATORY NO. 48.4: None.

PLAINTIFF/DECEDENT

INTERROGATORY NO. 49: Has Defendant obtained statement from any witnesses including the Plaintiffs? If so, please:

- (a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

REPOSENSE TO INTERROGATORY NO. 49: No.

INTERROGATORY NO. 50: Do you contend that the Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set out in detail in what respect the product was improperly used.

RESPONSE TO INTERROGATORY NO. 50: Discovery is continuing to develop a basis for this contention.

INTERROGATORY NO. 51: As to the sites listed on Exhibit A, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other than asbestos which contributed or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- (a) The facts upon which you rely;
- (b) The identity of the sources upon which you rely which substantiate these facts.

RESPONSE TO INTERROGATORY NO. 51: Discovery is continuing to develop a basis for this contention.

RESPIRATORS

INTERROGATORY NO. 52: Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so, state:

- (a) When the respirator was sold;
- (b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- (c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers; .
- (d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;

- (e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

RESPONSE TO INTERROGATORY NO. 52: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection, Defendant responds to this interrogatory by stating that Defendant introduced the use of masks, respirators, dust collectors and engaged in employee education including material handling techniques as well as the removal of asbestos from its products in order to minimize or eliminate any risk of occupational disease or pneumoconiosis to those engaged in the manufacture or production of Defendant's asbestos containing products. Discovery is continuing as to the date when respirators were issued to Defendant's employees and the name of the manufacturer and model number. Defendant does not have any documentation of tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

INTERROGATORY NO. 53: Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

- (a) Their identity, last known address;
- (b) The subject matter on which the expert is expected to testify;
- (c) The expert's specific conclusion and specific opinions and the specific basis therefore;
- (d) The expert's qualifications to render the opinions set forth above;
- (e) Whether any person identified in sub-paragraph (a) above has provided a report or other documentation to you, and if so, identify such document or report;
- (f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and
- (g) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to sub-paragraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.

RESPONSE TO INTERROGATORY NO. 53: Expert witnesses have not yet been determined at this time.

INTERROGATORY NO. 54: Please state the name and last known address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

RESPONSE TO INTERROGATORY NO. 54: Expert witnesses have not yet been determined at this time.

INTERROGATORY NO. 55: Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

RESPONSE TO INTERROGATORY NO. 55: Yes.

INTERROGATORY NO. 55.1: For each and every affirmative defense asserted in the answering defendant's Answer to Plaintiffs' Complaint, the Cross-Claims or Counter-Claims of any party against this answering defendant state:

- (a) the facts upon which the answering defendant relies for each and every affirmative defense;
- (b) each and every document which will be offered to prove each and every affirmative defense; and
- (c) each and every witness who will testify in support of each and every affirmative defense;
- (d) the substance and subject matter of the anticipated testimony of each witness identified in the preceeding response.

RESPONSE TO INTERROGATORY NO. 55.1: Information will be submitted at the time of pretrial once discovery is closed.

INTERROGATORY NO. 56: Does Defendant have policies of insurance that might cover the claims that have been made by the Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

RESPONSE TO INTERROGATORY NO. 56: This defendant asserts that it has coverage. However, the question of coverage and the extent of such coverage is currently undetermined. In an effort to cooperate, this defendant provides the following general information:

Over the relevant period of time, the Ferro Engineering Division of Oglebay Norton Company had liability insurance through Fireman's Fund.

INTERROGATORY NO. 56.1: Have you ever been involved in any litigation concerning potential insurance coverage for asbestos products liability matters? If so, please state:

- (a) the case caption, court and date of filing of each case in which you have been involved;
- (b) whether you were plaintiff or defendant;
- (c) a brief statement of the issues;
- (d) identify by date, author and recipient(s), (including recipients of carbon copies) all documents listed as exhibits by either party in this litigation;
- (e) identify by deponent and date all individuals who were deposed in these cases;

- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;
- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

RESPONSE TO INTERROGATORY NO. 56.1: No.

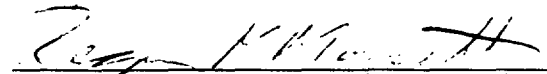
INTERROGATORY NO. 57: Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

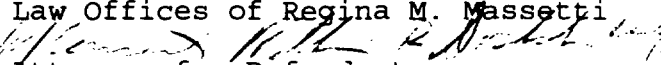
RESPONSE TO INTERROGATORY NO. 57: R. Patrick White, Esq., LAW OFFICES OF WHITE & BAKER, One Market, Spear Street Tower, 8th Floor, San Francisco, CA 94105. Regina M. Massetti, Esq., LAW OFFICES OF REGINA M. MASSETTI, 113 St. Clair Avenue, Suite 530, Cleveland, OH 44114.

INTERROGATORY NO. 58: State the last date that this Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

RESPONSE TO INTERROGATORY NO. 58: Defendant objects to this interrogatory on the grounds that it is overly broad and burdensome in that it is not limited in scope, time, or location to the facts alleged in the underlying complaint. Furthermore, it seeks information regarding every asbestos-containing product ever manufactured, sold, or distributed by this defendant. It is not limited as to products manufactured, sold, or distributed by this defendant to locations which are the subject of these

interrogatories and the underlying complaints. As such the interrogatory does not seek relevant and admissible evidence, nor is it designed to lead to relevant and admissible evidence. Without waiving the foregoing objection and subject thereto, Defendant responds to this interrogatory as follows: Please refer to Response to Interrogatory No. 47.1.


REGINA M. MASSETTI (0025475)

Law Offices of Regina M. Massetti

Attorney for Defendant
Ferro Engineering Division of
Oglebay Norton Company

CERTIFICATE OF SERVICE

I hereby certify that a true verified copy of the foregoing Defendant Oglebay Norton Company/Ferro Engineernig Div.'s Responses to Plaintiffs' Master Set of Interrogatories has been served upon the following by DHL Express mail and U.S. Mails, postage prepaid, this 15 day of August, 1997:

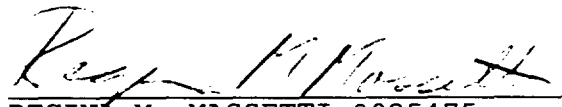
STEVEN D WOLENS
BARON & BUDD
THE CENTRUM SUITE 1100
3102 OAK LAWN AVENUE
DALLAS, TX 75219

and

BRUCE CARTER, ESQ.
43-B New Garver Road
Monroe, Ohio 45050

Attorneys for Plaintiffs

A notice of same has been forwarded this date to all defense counsel of record.


REGINA M. MASSETTI 0025475

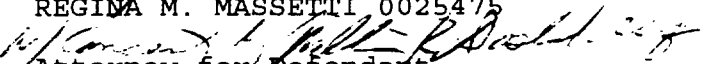

Attorney for Defendant
Ferro Engineering Division of
Oglebay Norton Company

EXHIBIT A

Ferroboard Rings - This product was used in the hot top system. The ring would be attached to the hot top casting and inserted into a mold to form a seal between the inner surface of the mold and the casting.

Ferroseal Gaskets - This product was used with the superimposed system. Its purpose was to fill the space between the hot top and the ingot mold.

Ferroboard - This product was used to line the ingot molds. The board was custom designed to fit different types of molds and may have had crease lines for folding the board into the proper shape. It may have been held in place by clips or hangers and was a one use only product.

Ferroboard Liner - This product was used in an insulating system and was only used in a cast iron hot top or superimposed hot top system.

Hot Top Covers - Hot Top Covers are a custom designed box designed to fit the top. They are an exothermic and insulation cover packaged in box form with a thin steel plate separating the exothermic layer from the insulating layers. Hot Top Covers were made to mold specifications and placed on top of the mold and/or hot top castings.

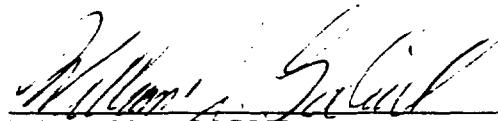
Hot Top Compounds - Redi-mix was a cement type veneering compound applied over firebricks or castables and served as a parting compound. The redi-mix and/or veneer compounds were mixed with water and troweled or sprayed to the inside of a hot top.

STATE OF OHIO

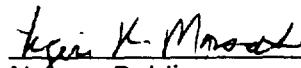
COUNTY OF CUYAHOGA

SS: VERIFICATION

WILLIAM J. GABRIEL, being a retired employee and duly authorized agent for Ferro Engineering, Division of Oglebay Norton Company, and after having first been duly sworn according to law deposes and states that the answers to the foregoing interrogatories are true as he verily believes.


WILLIAM J. GABRIEL

SWORN TO BEFORE ME and subscribed in my presence by WILLIAM J. GABRIEL this 14th day of August, 1997.


Notary Public
REGINA M. MASSETTI, Attorney
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Section 147.03 R. C.

OGELBAY NORTON