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FEB 25 1997

Attorneys for Defendant,  
A.P. GREEN SERVICES, INC.  
f/k/a BIGELOW-LIPTAK CORP.

WARTNICK LAW FIRM

CALENDAR

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

KAREN GATTON, as Personal  
Representative of the Estate  
of JERALD A. GATTON,  
deceased; and KAREN GATTON,  
Individually and on Behalf of  
the Legal Heirs of JERALD A.  
GATTON, deceased,

Plaintiffs,

vs.

ABEX CORPORATION, et al.,

Defendants.

No. 970360

A.P. GREEN SERVICES'  
RESPONSES TO PLAINTIFF'S  
FORM INTERROGATORIES

PROPOUNDING PARTY: Plaintiff KAREN GATTON

RESPONDING PARTY: Defendant A. P. GREEN SERVICES, INC.

SET NUMBER: ONE

Defendant, A.P. GREEN SERVICES, INC., hereby responds to  
plaintiff's Form Interrogatories, Set Number One, as follows:

RESPONSE TO INTERROGATORY NO. 1.1:

Duane Grummer, Esq.  
John J. Mifsud, Esq.  
Lynch, Gilardi & Grummer  
50 Francisco Street, Suite 400  
San Francisco, CA 94133.

1 RESPONSE TO INTERROGATORY NO. 3.1:

2 Yes:

- 3 (a) A.P. Green Services, Inc.  
4 (b) Bigelow Liptak Corporation, up to 1986.  
5 (c) Michigan, 1926.  
6 (d) Mexico, Missouri  
7 (e) No.

8 RESPONSE TO INTERROGATORY NO. 3.2:

9 No.

10 RESPONSE TO INTERROGATORY NO. 3.3:

11 No.

12 RESPONSE TO INTERROGATORY NO. 3.4:

13 No.

14 RESPONSE TO INTERROGATORY NO. 3.5:

15 No.

16 RESPONSE TO INTERROGATORY NO. 4.1:

17 This defendant objects to the use of the term "INCIDENT" in the  
18 context of asbestos litigation. As defined in these  
19 interrogatories, "INCIDENT" means a set of circumstances surrounding  
20 an injury. Plaintiff alleges that he suffered scores of such  
21 "injuries" at his numerous job sites, on numerous occasions, as a  
22 result of circumstances particular to each job site and as a result  
23 of the actions or omissions of various defendants. It is not  
24 specified in the complaint or in these interrogatories which of  
25 these particular sites and what set of circumstances is the  
26 "INCIDENT" which is the subject of this interrogatory. Thus, this  
27 interrogatory is vague, ambiguous, and unintelligible in the context  
28 of this lawsuit.

29 RESPONSE TO INTERROGATORY NO. 4.2:

30 This defendant objects to the use of the term "INCIDENT" in the

1 context of asbestos litigation. As defined in these  
2 interrogatories, "INCIDENT" means a set of circumstances surrounding  
3 an injury. Plaintiff alleges that he suffered scores of such  
4 "injuries" at his numerous job sites, on numerous occasions, as a  
5 result of circumstances particular to each job site and as a result  
6 of the actions or omissions of various defendants. It is not  
7 specified in the complaint or in these interrogatories which of  
8 these particular sites and what set of circumstances is the  
9 "INCIDENT" which is the subject of this interrogatory. Thus, this  
10 interrogatory is vague, ambiguous, and unintelligible in the context  
11 of this lawsuit.

12 RESPONSE TO INTERROGATORY NO. 12.1:

13 This defendant objects to the use of the term "INCIDENT" in the  
14 context of asbestos litigation. As defined in these  
15 interrogatories, "INCIDENT" means a set of circumstances surrounding  
16 an injury. Plaintiff alleges that he suffered scores of such  
17 "injuries" at his numerous job sites, on numerous occasions, as a  
18 result of circumstances particular to each job site and as a result  
19 of the actions or omissions of various defendants. It is not  
20 specified in the complaint or in these interrogatories which of  
21 these particular sites and what set of circumstances is the  
22 "INCIDENT" which is the subject of this interrogatory. Thus, this  
23 interrogatory is vague, ambiguous, and unintelligible in the context  
24 of this lawsuit.

25 RESPONSE TO INTERROGATORY NO. 12.2:

26 This defendant objects to the use of the term "INCIDENT" in the  
27 context of asbestos litigation. As defined in these  
28 interrogatories, "INCIDENT" means a set of circumstances surrounding

1 an injury. Plaintiff alleges that he suffered scores of such  
2 "injuries" at his numerous job sites, on numerous occasions, as a  
3 result of circumstances particular to each job site and as a result  
4 of the actions or omissions of various defendants. It is not  
5 specified in the complaint or in these interrogatories which of  
6 these particular sites and what set of circumstances is the  
7 "INCIDENT" which is the subject of this interrogatory. Thus, this  
8 interrogatory is vague, ambiguous, and unintelligible in the context  
9 of this lawsuit.

10 RESPONSE TO INTERROGATORY NO. 12.3:

11 This defendant objects to the use of the term "INCIDENT" in the  
12 context of asbestos litigation. As defined in these  
13 interrogatories, "INCIDENT" means a set of circumstances surrounding  
14 an injury. Plaintiff alleges that he suffered scores of such  
15 "injuries" at his numerous job sites, on numerous occasions, as a  
16 result of circumstances particular to each job site and as a result  
17 of the actions or omissions of various defendants. It is not  
18 specified in the complaint or in these interrogatories which of  
19 these particular sites and what set of circumstances is the  
20 "INCIDENT" which is the subject of this interrogatory. Thus, this  
21 interrogatory is vague, ambiguous, and unintelligible in the context  
22 of this lawsuit.

23 RESPONSE TO INTERROGATORY NO. 12.4:

24 This defendant objects to the use of the term "INCIDENT" in the  
25 context of asbestos litigation. As defined in these  
26 interrogatories, "INCIDENT" means a set of circumstances surrounding  
27 an injury. Plaintiff alleges that he suffered scores of such  
28 "injuries" at his numerous job sites, on numerous occasions, as a

1 result of circumstances particular to each job site and as a result  
2 of the actions or omissions of various defendants. It is not  
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4 these particular sites and what set of circumstances is the  
5 "INCIDENT" which is the subject of this interrogatory. Thus, this  
6 interrogatory is vague, ambiguous, and unintelligible in the context  
7 of this lawsuit.

8 RESPONSE TO INTERROGATORY NO. 12.5:

9 This defendant objects to the use of the term "INCIDENT" in the  
10 context of asbestos litigation. As defined in these  
11 interrogatories, "INCIDENT" means a set of circumstances surrounding  
12 an injury. Plaintiff alleges that he suffered scores of such  
13 "injuries" at his numerous job sites, on numerous occasions, as a  
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17 these particular sites and what set of circumstances is the  
18 "INCIDENT" which is the subject of this interrogatory. Thus, this  
19 interrogatory is vague, ambiguous, and unintelligible in the context  
20 of this lawsuit.

21 RESPONSE TO INTERROGATORY NO. 12.6:

22 This defendant objects to the use of the term "INCIDENT" in the  
23 context of asbestos litigation. As defined in these  
24 interrogatories, "INCIDENT" means a set of circumstances surrounding  
25 an injury. Plaintiff alleges that he suffered scores of such  
26 "injuries" at his numerous job sites, on numerous occasions, as a  
27 result of circumstances particular to each job site and as a result  
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2 these particular sites and what set of circumstances is the  
3 "INCIDENT" which is the subject of this interrogatory. Thus, this  
4 interrogatory is vague, ambiguous, and unintelligible in the context  
5 of this lawsuit.

6 RESPONSE TO INTERROGATORY NO. 12.7:

7 This defendant objects to the use of the term "INCIDENT" in the  
8 context of asbestos litigation. As defined in these  
9 interrogatories, "INCIDENT" means a set of circumstances surrounding  
10 an injury. Plaintiff alleges that he suffered scores of such  
11 "injuries" at his numerous job sites, on numerous occasions, as a  
12 result of circumstances particular to each job site and as a result  
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16 "INCIDENT" which is the subject of this interrogatory. Thus, this  
17 interrogatory is vague, ambiguous, and unintelligible in the context  
18 of this lawsuit.

19 RESPONSE TO INTERROGATORY NO. 13.1:

20 This defendant objects to the use of the term "INCIDENT" in the  
21 context of asbestos litigation. As defined in these  
22 interrogatories, "INCIDENT" means a set of circumstances surrounding  
23 an injury. Plaintiff alleges that he suffered scores of such  
24 "injuries" at his numerous job sites, on numerous occasions, as a  
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28 these particular sites and what set of circumstances is the

1 "INCIDENT" which is the subject of this interrogatory. Thus, this  
2 interrogatory is vague, ambiguous, and unintelligible in the context  
3 of this lawsuit.

4 RESPONSE TO INTERROGATORY NO. 13.2:

5 This defendant objects to the use of the term "INCIDENT" in the  
6 context of asbestos litigation. As defined in these  
7 interrogatories, "INCIDENT" means a set of circumstances surrounding  
8 an injury. Plaintiff alleges that he suffered scores of such  
9 "injuries" at his numerous job sites, on numerous occasions, as a  
10 result of circumstances particular to each job site and as a result  
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14 "INCIDENT" which is the subject of this interrogatory. Thus, this  
15 interrogatory is vague, ambiguous, and unintelligible in the context  
16 of this lawsuit.

17 RESPONSE TO INTERROGATORY NO. 14.1:

18 This defendant objects to the use of the term "INCIDENT" in the  
19 context of asbestos litigation. As defined in these  
20 interrogatories, "INCIDENT" means a set of circumstances surrounding  
21 an injury. Plaintiff alleges that he suffered scores of such  
22 "injuries" at his numerous job sites, on numerous occasions, as a  
23 result of circumstances particular to each job site and as a result  
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27 "INCIDENT" which is the subject of this interrogatory. Thus, this  
28 interrogatory is vague, ambiguous, and unintelligible in the context

1 of this lawsuit.

2 RESPONSE TO INTERROGATORY NO. 14.2:

3 This defendant objects to the use of the term "INCIDENT" in the  
4 context of asbestos litigation. As defined in these  
5 interrogatories, "INCIDENT" means a set of circumstances surrounding  
6 an injury. Plaintiff alleges that he suffered scores of such  
7 "injuries" at his numerous job sites, on numerous occasions, as a  
8 result of circumstances particular to each job site and as a result  
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12 "INCIDENT" which is the subject of this interrogatory. Thus, this  
13 interrogatory is vague, ambiguous, and unintelligible in the context  
14 of this lawsuit.

15 RESPONSE TO INTERROGATORY NO. 15.1:

16 This defendant objects to the use of the term "INCIDENT" in the  
17 context of asbestos litigation. As defined in these  
18 interrogatories, "INCIDENT" means a set of circumstances surrounding  
19 an injury. Plaintiff alleges that he suffered scores of such  
20 "injuries" at his numerous job sites, on numerous occasions, as a  
21 result of circumstances particular to each job site and as a result  
22 of the actions or omissions of various defendants. It is not  
23 specified in the complaint or in these interrogatories which of  
24 these particular sites and what set of circumstances is the  
25 "INCIDENT" which is the subject of this interrogatory. Thus, this  
26 interrogatory is vague, ambiguous, and unintelligible in the context  
27 of this lawsuit.

28 Defendant objects to this interrogatory to the use of the term

1 "material allegation." The complaint does not contain any  
2 allegation which are particularly relevant to this defendant.  
3 Rather, the complaint contains allegations generic to hundreds of  
4 defendants, and it is not specified at which location or in what  
5 manner this plaintiff was allegedly exposed to asbestos as a result  
6 of the acts or omissions of this defendant. This defendant denied  
7 the generic allegations of the complaint on information and belief,  
8 and cannot respond further at this time. Similarly, this defendant  
9 stated several affirmative defenses in its answer in order to avoid  
10 possible waiver of them, and cannot provide further information at  
11 this time.

12 RESPONSE TO INTERROGATORY NO. 16.1:

13 This defendant objects to the use of the term "INCIDENT" in the  
14 context of asbestos litigation. As defined in these  
15 interrogatories, "INCIDENT" means a set of circumstances surrounding  
16 an injury. Plaintiff alleges that he suffered scores of such  
17 "injuries" at his numerous job sites, on numerous occasions, as a  
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21 these particular sites and what set of circumstances is the  
22 "INCIDENT" which is the subject of this interrogatory. Thus, this  
23 interrogatory is vague, ambiguous, and unintelligible in the context  
24 of this lawsuit.

25 RESPONSE TO INTERROGATORY NO. 16.2:

26 This defendant objects to the use of the term "INCIDENT" in the  
27 context of asbestos litigation. As defined in these  
28 interrogatories, "INCIDENT" means a set of circumstances surrounding

1 an injury. Plaintiff alleges that he suffered scores of such  
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7 "INCIDENT" which is the subject of this interrogatory. Thus, this  
8 interrogatory is vague, ambiguous, and unintelligible in the context  
9 of this lawsuit.

10 RESPONSE TO INTERROGATORY NO. 16.3:

11 This defendant objects to the use of the term "INCIDENT" in the  
12 context of asbestos litigation. As defined in these  
13 interrogatories, "INCIDENT" means a set of circumstances surrounding  
14 an injury. Plaintiff alleges that he suffered scores of such  
15 "injuries" at his numerous job sites, on numerous occasions, as a  
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19 these particular sites and what set of circumstances is the  
20 "INCIDENT" which is the subject of this interrogatory. Thus, this  
21 interrogatory is vague, ambiguous, and unintelligible in the context  
22 of this lawsuit.

23 RESPONSE TO INTERROGATORY NO. 16.4:

24 This defendant objects to the use of the term "INCIDENT" in the  
25 context of asbestos litigation. As defined in these  
26 interrogatories, "INCIDENT" means a set of circumstances surrounding  
27 an injury. Plaintiff alleges that he suffered scores of such  
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6 interrogatory is vague, ambiguous, and unintelligible in the context  
7 of this lawsuit.

8 RESPONSE TO INTERROGATORY NO. 16.5:

9 This defendant objects to the use of the term "INCIDENT" in the  
10 context of asbestos litigation. As defined in these  
11 interrogatories, "INCIDENT" means a set of circumstances surrounding  
12 an injury. Plaintiff alleges that he suffered scores of such  
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17 these particular sites and what set of circumstances is the  
18 "INCIDENT" which is the subject of this interrogatory. Thus, this  
19 interrogatory is vague, ambiguous, and unintelligible in the context  
20 of this lawsuit.

21 RESPONSE TO INTERROGATORY NO. 16.6:

22 This defendant objects to the use of the term "INCIDENT" in the  
23 context of asbestos litigation. As defined in these  
24 interrogatories, "INCIDENT" means a set of circumstances surrounding  
25 an injury. Plaintiff alleges that he suffered scores of such  
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2 these particular sites and what set of circumstances is the  
3 "INCIDENT" which is the subject of this interrogatory. Thus, this  
4 interrogatory is vague, ambiguous, and unintelligible in the context  
5 of this lawsuit.

6 RESPONSE TO INTERROGATORY NO. 16.9:

7 This defendant objects to the use of the term "INCIDENT" in the  
8 context of asbestos litigation. As defined in these  
9 interrogatories, "INCIDENT" means a set of circumstances surrounding  
10 an injury. Plaintiff alleges that he suffered scores of such  
11 "injuries" at his numerous job sites, on numerous occasions, as a  
12 result of circumstances particular to each job site and as a result  
13 of the actions or omissions of various defendants. It is not  
14 specified in the complaint or in these interrogatories which of  
15 these particular sites and what set of circumstances is the  
16 "INCIDENT" which is the subject of this interrogatory. Thus, this  
17 interrogatory is vague, ambiguous, and unintelligible in the context  
18 of this lawsuit.

19 RESPONSE TO INTERROGATORY NO. 16.10:

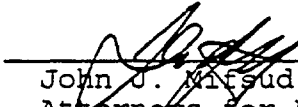
20 This defendant objects to the use of the term "INCIDENT" in the  
21 context of asbestos litigation. As defined in these  
22 interrogatories, "INCIDENT" means a set of circumstances surrounding  
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28 these particular sites and what set of circumstances is the

1 "INCIDENT" which is the subject of this interrogatory. Thus, this  
2 interrogatory is vague, ambiguous, and unintelligible in the context  
3 of this lawsuit.

4 DATED: 2/21/97

LYNCH, GILARDI & GRUMMER

5  
6 By

  
John J. Mifsud, Esq.  
Attorneys for Defendant,  
A.P. GREEN SERVICES, INC.  
f/k/a BIGELOW-LIPTAK CORP.

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9 VASBIGC1891PIFI.RES  
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