PLAINTIFF'S EXHIBIT CT-76

EX 'C'

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Attorneys for Defendants
The Center for Claims Resolution Defendants, including A.P GREEN INDUSTRIES, INC.; ARMSTRONG WORLD INDUSTRIES, INC.; CERTAINTEED CORPORATION; FLEXITALLIC, INC.; GAF CORPORATION; ASBESTOS CLAIMS MANAGEMENT CORPORATION (Formerly National Gypsum Company); QUIGLEY COMPANY, INC.; T&N, PLC; UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC. (Formerly Union Carbide Corporation); and UNITED STATES GYPSUM COMPANY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

SHIBLEY ABBISS, et al., Plaintiffs, vs. A.H. VOSS COMPANY, et al., Defendants.	CASE NO. 717108 DEFENDANT CERTAINTEED CORPORATION'S RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES (FIRST SET)

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: Defendant, CERTAINTEED CORPORATION

SET NO.: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant CERTAINTEED CORPORATION responds to plaintiffs' First Set of Interrogatories as follows:

GENERAL OBJECTION

CertainTeed objects to these Interrogatories on the grounds that they are overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information inasmuch as they request information about products which were never sold in California and about products with which the plaintiff never would have worked and to which the plaintiff would never have been exposed. The following responses are limited to asbestos-bearing products which could have reached the geographic area of California.

RESPONSE TO INTERROGATORY NO. 1:

Curtis M. Pontz
Associate General Counsel and Assistant Secretary CertainTeed Corporation
750 E. Swedesford Road
Valley Forge, PA 19482

RESPONSE TO INTERROGATORY NOS. 2-13:

Do not require a response.

RESPONSE TO INTERROGATORY NO. 14:

Yes.

RESPONSE TO INTERROGATORY NO. 15:

15.(a-f) ROOF CEMENTS AND COATINGS AND FOUNDATION COATING:

I. Asbestos Roof Coating - First placed on the market prior to 1930. Withdrawn from the market in 1982 due to economic considerations (poor profit margins) . It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for use as a coating for smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

II. Blind Nailing Cement - First placed on the market prior to 1930. Withdrawn from the market in 1979 due to economic considerations (poor prof it margins) . It was composed of asphalt, mineral spirits and approximately 13% 7M chrysotile asbestos fiber. It was designed for use in sealing the laps of roll roofing applied with no exposed nails and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be applied with a stiff brush or trowel and any atmospheric temperature was recommended.

III. Plastic Cement - First placed on the market prior to 1930. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, pulverized limestone and approximately 18% 7K chrysotile asbestos fiber and 18% 7M chrysotile asbestos fiber. It was designed for flashing, caulking, heavy duty roof repairs and patching roof flashings and was sold in 1 pint, 1 quart, 1/2 gallon and 1 gallon friction top steel cans, 3 and 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

IV. Sealing Cement - First placed on the market prior to 1930. Withdrawn from the market in 1976 due to economic considerations (poor profit margins) . It was composed of asphalt, mineral spirits and approximately 29% 7M chrysotile asbestos fiber. It was designed for sealing down asphalt shingles and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

V. Cold Process Cement - First placed on the market in approximately 1940. Withdrawn from the market in 1967 (replaced by Cold Process Asphalt). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for use in applying rolls of smooth roofing to

obtain a built-up roof and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VI. Cold Process Asphalt - First placed on the market in 1967. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. Cold process asphalt was the name given to "cold process cement" subsequent to 1967. It was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VII. Stabilized Roof Coating - First placed on the market in approximately 1940. Withdrawn from the market in 1967 due to economic considerations (poor profit margins) . It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for coating cold process smooth surface built-up asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VIII. Wet Seal Plastic Cement - First placed on the market in 1961. Withdrawn from the market in 1983 due to economic considerations (poor profit margins) . It was composed of asphalt, mineral spirits, an amine wetting agent, pulverized limestone and approximately 18% 7K chrysotile asbestos and 18% 7M chrysotile asbestos. It was designed for use in providing adhesion to wet or damp surfaces in making heavy duty repairs to wet roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name

appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

IX. Asphalt Fibered Emulsion - First placed on the market sometime during the 1950's. Withdrawn from the market in 1983 due to economic considerations (poor profit margins) . It was composed of asphalt, water, clay, electrolyte and an unknown quantity of asbestos fiber. It was designed for coating smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

X. Fibered Aluminum Roof Coating - First placed on the market in 1951. Withdrawn from the market in 1979 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, aluminum powder and an unknown quantity of asbestos fiber. It was designed for coating smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous aluminum colored liquid that could be spread with a brush or roller and any atmospheric temperature was recommended.

XI. Asphalt Foundation Coating - First placed on the market in approximately 1940. Withdrawn from the market in 1981 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for coating the exterior of foundations before backfilling and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

At some point CertainTeed commenced affixing its logo (C and T with the stem of the T inserted sideways into the C) to the containers in which its roof coatings and cements and foundation coating were packaged.

BUILT-UP ROOFING PLY SHEET:

XII. No. 15 Perforated Saturated Asbestos Felt - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber and 58% asbestos fiber (type and grade unknown) . It was designed for use as plys for built-up roofs and flashing and packaged with a kraft paper wrapper, was not color coded, and contained no logo or markings except for laying lines of aluminum paint. The CertainTeed name appeared on the wrap. It was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

XIII. Asbestos Base Sheet - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand f or the product. It was composed of asphalt, organic fiber, glass fiber, pulverized limestone, pulverized talc and 20% asbestos fiber (type and grade unknown). It was designed for use as the first ply in applying a built-up roof and packaged with a kraft paper wrapper, was not color coded, and contained no logo or other marking except for laying lines of orange-red paint. The CertainTeed name appeared on the wrap. It was a black roll good which was nailed or applied with hot asphalt and any atmospheric temperature was recommended.

XIV. Asbestos Base Flashing - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber, pulverized limestone, pulverized talc, 19% asbestos fiber (type and grade unknown) and either glass, hemp or jute fiber. It was designed for use as one ply in installing flashing and packaged with a kraft paper wrapper, was not color coded and contained no logo or other markings. The CertainTeed name

appeared on the wrap. It was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

XV. Asbestos Cap Sheet (mineral surfaced) - First placed on the market in 1973. Withdrawn from the market in 1976 due to lack of demand f or the product. It was composed of asphalt, organic fiber, pulverized limestone, pulverized talc, coarse crushed rock and 13.8% asbestos fiber (type and grade unknown). It was designed for use as the top ply on built-up roofs and packaged with a kraft paper wrapper, was not color coded and contained no logo or other markings except for a laying line of orange-red paint. The CertainTeed name appeared on the wrap. it was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

ASBESTOS-CEMENT SIDING SHINGLES:

XVI. Asbestos-Cement Siding Shingles (manufactured by others) - First placed on the market in approximately 1950. Withdrawn from the market in approximately the early 1970's due to economic considerations (poor profit margins). Asbestos-cement siding shingles were flat slabs which came in various colors (type, grade and quantity of asbestos fiber unknown). They were designed for use on the exterior of homes and they were supplied in packages having a corrugated fiberboard band and sides held in place by two wire ties. The CertainTeed name appeared on the band and any atmospheric temperature was recommended.

SPECIALTY RAILROAD INSULATION PRODUCTS:

XVII. Glass Fiber Blanket Insulation Faced with Asbestos Paper for Railroad Car Application - First placed on the market by Gustin-Bacon Manufacturing Company in 1945 (CertainTeed, through merger, acquired the Gustin-Bacon Manufacturing Company on July 1, 1966, and at the time of the merger all the ordinary liabilities of Gustin-Bacon were assumed by CertainTeed) . Withdrawn from the market in 1947 because of poor moisture vapor transmission and as a result of the determination that there was no need for an incombustible facing. It was

composed of nine-micron glass fiber blanket and reinforced asbestos paper facing. It was intended solely for use in insulating ceilings, walls and floors of railroad passenger cars and was packaged in cardboard or wrapped in heavy kraft paper. No writing is believed to have been on the product. The content of any writing on the packaging is unknown and the recommended temperature range is unknown.

XVIII. Flexible Trainline - First placed on the market by Gustin-Bacon Manufacturing Company in 1945. First manufactured and sold by CertainTeed in 1966. Withdrawn from the market in 1970 due to lack of demand for the product. It was composed of nine-micron glass fiber blanket, resin bonded and adhered with adhesive to neoprene coated asbestos cloth. It was intended solely for use in insulating railroad passenger car steam lines. It was packaged in cardboard or wrapped in heavy kraft paper. No writing is believed to have been on the product. The content of any writing on the packaging is unknown and the recommended temperature limit was 3000F.

JOINT TREATING COMPOUND:

XIX. Joint Treating Compound (may have carried the brand name Bestwall) - First placed on the market in 1937. Sales of this product were discontinued on June 30, 1956, when CertainTeed sold its gypsum assets. The composition is unknown other than it is believed to have contained approximately 4 percent asbestos fiber by weight. Joint treating compound was applied to the joints of gypsum wallboard and sold in bags (no additional information is known). It was grayish white and the recommended temperature range is unknown. This product was sold on a regional basis and is not believed to have been sold in California.

ASBESTOS-CEMENT PIPE:

XX. Asbestos-Cement Pipe (may have carried the brand name FluidTite) - First placed on the market on June 1, 1962.

CertainTeed ceased the manufacture of asbestos-cement pipe in 1992. The asbestos fiber was bound into the asbestos-cement pipe by a combination of

cement, silica and water through an autoclave (high pressure steam atmosphere) curing process.

It contained the following amounts of asbestos by weight:

Pressure Pipe	15 - 20%
Sewer Pipe	10 - 15%
Irrigation Pipe	11 - 20%

Of the total asbestos content of the asbestos-cement pipe, anywhere from 0% to 24% was crocidolite (blue) fiber by weight, with the remaining fiber being chrysotile (white). The ratio of these fibers varied in accordance with various factors, including type of pipe and physical dimensions.

Asbestos-cement pipe was used for the underground transmission of water and sewage. No packaging was used in connection with this product. The sewer pipe contained black lettering, including the name "CertainTeed", the pressure pipe contained either black or orange lettering, including the name "CertainTeed," and the irrigation pipe had black lettering including the name "CertainTeed". It was installed in the form in which it was sold except to the extent that it may have required machining in order to meet a specific length.

Asbestos-cement pipe was cylindrical in shape, cement gray in color with a smooth interior, relatively rough textured exterior, with ends machined to given dimensions. Pipe lengths were connected with an asbestos-cement coupling with two rubber rings contained in machined grooves. The temperature limit was 200 F.

g. CertainTeed was the manufacturer except as follows:

Asbestos Roof Coating - made from 1977 to 1982 by APOC

Blind Nailing Cement - made from 1977 to 1979 by APOC

Plastic Cement - made from 1977 to 1983 by APOC

Cold Process Asphalt - made from 1977 to 1983 by APOC

Wet Seal Plastic Cement - made from 1977 to 1983 by APOC

Asphalt Fibered Emulsion - made by Chevron Asphalt Company from 1950's to 1983

Fibered Aluminum Roof Coating - made by Chevron Asphalt Company from 1951 to 1979

No. 15 Perforated Saturated Asbestos Felt, Asbestos Base Sheet, Asbestos Base Flashing - made from 1968 to 1972 by GAF

Asbestos-Cement Siding Shingles - made by National Gypsum

Flexible Trainline - made from 1945 to 1966 by Gustin-Bacon Manufacturing Company

Glass fiber blanket insulation jacket with asbestos paper for railroad car application - made from 1945 to 1947 by Gustin-Bacon Manufacturing Company.

b. The asbestos fibers used in roof coatings and cements were supplied by Johns-Manville until the mid-1960's and by Carey-Canadian Mines from the mid-1960's through 1977. Unknown as to roll roofing products, asbestos-cement siding shingles, Flexible Trainline, glass fiber blanket insulation faced with asbestos paper for railroad car application and joint treating compound.

The following companies have been sources of asbestos fiber which has been incorporated into the asbestos-cement pipe manufactured by CertainTeed in California:

Cassiar Resources
Griqueland
Cape Asbestos
General Mining
Russian Fiber
Asbestos Corp.
Johns-Manville
Jefferson Lake
Pacific Asbestos
Calaveras Asbestos
Bell Asbestos Mines
Turner Asbestos Fibre Ltd.

RESPONSE TO INTERROGATORY NO. 16:

CertainTeed objects to this Interrogatory on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information. Without waiving said objection and subject thereto, see answer to Interrogatory No. 15. Also, without waiving said objection and subject thereto, the chemical composition of CertainTeed's asbestos-cement pipe may have been changed to the extent that the percentages of the ingredients have been altered slightly, depending on the quality of the asbestos fiber being used at the time of manufacture and on the quantity of recycled material being used at the time of manufacture.

RESPONSE TO INTERROGATORY NO. 17:

See answer to Interrogatory No. 16.

RESPONSE TO INTERROGATORY NOS. 18-21:

Do not require a response.

RESPONSE TO INTERROGATORY NO. 22:

CertainTeed has no sales records relating to roofing products prior to 1973. Since 1978, CertainTeed roofing sales records have been maintained on computer. If required, computer printouts of the pertinent sales, if any, of asbestos-bearing roofing products will be made available at the law offices of CertainTeed counsel for proper counsel's review and/or copying.

Invoices for all roofing sales for the years 1973-1975 are stored in cartons by invoice number, by month, at CertainTeed's facility in Blue Bell, Pennsylvania. Invoices for all roofing sales for the years 1976 and 1977 are on microfilm by invoice number, by month, at CertainTeed's facility in Blue Bell, Pennsylvania. Thus, each invoice would have to be reviewed in order to determine which invoices would be responsive to any request for sales records. Such a review would be unduly burdensome and oppressive to conduct. If required, CertainTeed will make these documents available at its facility in Blue Bell, Pennsylvania, for review and copying by proper counsel at a mutually

convenient time with all costs attendant to this inspection and copying to be assumed by the party conducting such inspection.

CertainTeed has no sales records for joint treating compound, asbestos-cement siding shingles, Flexible Trainline and glass fiber blanket faced with asbestos paper for railroad car application (the two latter products were sold exclusively to railroad companies).

CertainTeed has no sales records for asbestos-cement pipe for the period 1962 (when CertainTeed commenced the manufacture of said product) to 1966. For the period 1967 to 1979, CertainTeed has invoices for sales for June 1967, October through December 1968, and 1969 through 1979, inclusive.

The approximate numbers of such invoices are as follows:

6/67, 10-12/68	2,500
1969	14,950
1970	13,900
1971	16,250
1972	15,050
1973	16,364
1974	23,000
1975	25,000
1976	25,000
1977	28,000
1978	30,800
1979	33,300

These invoices have been maintained on microfilm and are filed only by invoice number, plant and year. Thus, CertainTeed would have to review each and every invoice in order to provide the specific information sought by any request for sales records. Such a review would be highly burdensome and oppressive. If required, CertainTeed will make available said invoices, which are maintained at the headquarters of CertainTeed's Pipe Group in Valley Forge, Pennsylvania, for review and copying by proper counsel at a mutually convenient time, with all costs attendant to this inspection and any copying to be assumed by the party conducting such inspection.

For the period 1980 to 1992, CertainTeed's sales records for asbestos-cement pipe are contained in computer printouts. At plaintiff's request, CertainTeed's counsel will

make said printouts available to proper counsel for review and/or copying at a mutually convenient time, with all costs attendant to any such inspection and any copying to be assumed by the party conducting such inspection.

RESPONSE TO INTERROGATORY NO. 23:

See answer to Interrogatory No. 22.

RESPONSE TO INTERROGATORY NO. 24:

No.

RESPONSE TO INTERROGATORY NO. 25:

See answer to Interrogatory No. 24.

RESPONSE TO INTERROGATORY NO. 26:

See answer to Interrogatory No. 24.

RESPONSE TO INTERROGATORY NO. 27:

Commencing in 1977 CertainTeed included in the comprehensive asbestos-cement pipe binder collation furnished to purchasers of its asbestos-cement pipe a booklet entitled "Recommended Work Practices for A/C Pipe," published by the A/C Pipe Producers Association. The entire booklet was intended to warn about improper pipe machining techniques. The booklet was incorporated into the CertainTeed Installation Guide for Fluid-Tite Asbestos-Cement Pressure Pipe as well as into the CertainTeed Asbestos-Cement Pressure Installation Guide.

In addition, CertainTeed printed a warning in certain of its brochures as follows:

(1) CertainTeed Installation Guide Asbestos-Cement Fluid-Tite Non-Pressure Sewer Pipe (Code No. 40-31-06). On page 21, it was stated, "CAUTION - Asbestos-cement pipe contains asbestos fibers. Do not cut or machine without protection. Breathing asbestos dust may cause serious bodily harm." Published early 1980 - use discontinued after document inventory depleted. This document was typically used only in comprehensive asbestos-cement pipe binder collations, which always included a copy of the booklet entitled

"Recommended Work Practices for A/C Pipe," published by the A/C Pipe Producers Association.

(2) Installation Guide Fluid-Tite Pressure Pipe (Code No. 40-21-07). On inside front cover and on page 31, it was stated as cited in (1) above. Published early 1977 replaced in 1982 by the A/C Pressure Installation Guide cited in subpart (3) below. Also incorporated a reproduction of the booklet entitled "Recommended Work Practices for A/C Pipe," published by A/C Pipe Producers Association.

(3) A/C Pressure Installation Guide - Distribution and Fluid Transmission Piping Systems (Code 40-23-07). On page 9 it was stated, "CAUTION - Asbestos-cement pipe contains asbestos fibers. Do not cut or machine without protection. Breathing asbestos dust may cause serious bodily harm. Refer to 'Recommended Work Practices for A/C Pipe.'" Pages 39-47 were a reproduction of the booklet entitled "Recommended Work Practices for A/C Pipe" published by the A/C Pipe Producers Association. Published March 1982.

RESPONSE TO INTERROGATORY NO. 28:

CertainTeed objects to this Interrogatory on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection and subject thereto, CertainTeed does not maintain a log or registry that would enable it to respond to this Interrogatory other than to state as follows:

The label placed on CertainTeed asbestos-cement pipe beginning in 1979 read as follows:

"CAUTION: Always use recommended work practices. Do not use abrasive saws. When cutting, machining and tapping, refer to Recommended Work Practices Guide furnished by manufacturer to your employer."

In approximately July 1985 the caution label was changed to read as follows:

> CAUTION:
> Contains asbestos fiber.
> Avoid creating dust. Breathing asbestos dust can cause serious bodily harm, including cancer and asbestosis. When cutting, machining and tapping always use recommended work practices (Refer to Recommended Work Practices Guide furnished by manufacturer to your employer).
> Do not use Abrasive Disc Saws.

The warning was placed on the unmachined portion of pipe (quarter lengths and larger) at or near the end of the pipe.

RESPONSE TO INTERROGATORY NO. 29:

(a) - (d) and (f)

See answer to Interrogatory No. 28.

(e) Unknown.

(g) No.

RESPONSE TO INTERROGATORY NO. 30:

The first such third-party claim was served against CertainTeed in October 1975, and the first such workers, compensation claim was filed in December 1972.

RESPONSE TO INTERROGATORY NO. 31:

See answer to Interrogatory No. 30. The remainder of this Interrogatory is objected to on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE TO INTERROGATORY NO. 32:

See the attached Exhibit A.

RESPONSE TO INTERROGATORY NO. 33:

See answer to Interrogatory No. 32.

RESPONSE TO INTERROGATORY NO. 34:

See answer to Interrogatory No. 15.

RESPONSE TO INTERROGATORY NO. 35:

CertainTeed may have received such reports but it has no log or registry that would enable it to respond to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 36:

Yes.

RESPONSE TO INTERROGATORY NO. 37:

(a) - (b) Commencing in 1962, CertainTeed imported asbestos fiber from Canada, Russia and Africa for incorporation into its asbestos-cement pipe.

(c) No.

(d) Not applicable.

RESPONSE TO INTERROGATORY NO. 38:

See answer to Interrogatory No. 15.

RESPONSE TO INTERROGATORY NO. 39:

No.

RESPONSE TO INTERROGATORY NO. 40:

Not applicable.

RESPONSE TO INTERROGATORY NO. 41:

No.

RESPONSE TO INTERROGATORY NO. 42:

Not applicable.

RESPONSE TO INTERROGATORY NO. 43:

No.

RESPONSE TO INTERROGATORY NO. 44:

CertainTeed has employed a Medical Director since 1973. Dr. J.L. Goodman served from March 1973 until December 1978. Dr. L.J. Mellon has served in that capacity from December 1978 to the present.

RESPONSE TO INTERROGATORY NO. 45:

Tad Decker, Esq. Executive Vice President and General Counsel.

RESPONSE TO INTERROGATORY NO. 46:

The Medical Director is responsible for CertainTeed's medical program, a program of preventive medical care to deal constructively with the health of employees in relation to their work.

The basic objectives of the medical program are as follows: (1) To protect employees against health and safety hazards in their work situation; (2) Insofar as practical and feasible, to protect the general environment of the community; (3) To facilitate the placement of workers according to their physical, mental and emotional capacities in work which they can perform with an acceptable degree of efficiency and without endangering their own health and safety or that of others; (4) To assure adequate medical care and rehabilitation of the occupationally ill and injured; and (5) To encourage and assist in measures for personal health maintenance, including the retention of a personal physician whenever possible.

RESPONSE TO INTERROGATORY NO. 47:

CertainTeed objects to this Interrogatory on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information.

RESPONSE TO INTERROGATORY NO. 48:

The following individuals have been employed as industrial hygienists for CertainTeed Corporation:

Leon Horowitz was employed by CertainTeed Corporation at its offices in Valley Forge, PA from 1962 - 1967. Mr. Horowitz is no longer employed by CertainTeed.

Walter Gubar was employed by CertainTeed at its offices in Kansas City, Kansas from 1966 - 1984. Mr. Gubar is retired from CertainTeed.

Owen H. Kittilstad was employed by CertainTeed at its facilities in Valley Forge, PA from 1977 to 1988. Mr. Kittilstad, who was Corporate Director, Health & Safety, is retired from CertainTeed.

Thomas C. Shaffer was employed by CertainTeed at its facilities in Valley Forge, PA from 1978 - 1981. Mr. Shaffer is no longer employed by CertainTeed.

Janis L. Woodson has been employed by CertainTeed at its facilities in Valley Forge, PA since 1978. Ms. Woodson's current title is Industrial Hygiene Specialist.

Peter J. Norris was employed by CertainTeed as a Corporate Industrial Hygienist at its facilities in Valley Forge, PA from 1981 - 1986. Mr. Norris is no longer employed by CertainTeed.

CertainTeed objects to the remainder of this Interrogatory on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information.

RESPONSE TO INTERROGATORY NO. 49:

No.

RESPONSE TO INTERROGATORY NO. 50:

See answer to Interrogatory No. 47. Without waiving said objection and subject thereto, CertainTeed maintained a corporate library at its facilities in Blue Bell, Pennsylvania between 1977 and 1994. Some materials received by the library may have pertained to or referred to asbestos.

RESPONSE TO INTERROGATORY NO. 51:

CertainTeed objects to this Interrogatory on the basis that it is overly broad and unduly burdensome. Without waiving said objection and subject thereto, CertainTeed belonged to N.I.M.A. from 1967 through 1973, T.I.M.A. from 1973 through the present,

A.I.A./N.A. since its founding in 1971, and the Association of Asbestos-Cement Pipe Producers from its formation in 1973 through 1992. CertainTeed joined the Industrial Health Foundation in 1968 (we have no record of when CertainTeed ended its affiliation).

RESPONSE TO INTERROGATORY NO. 52:

CertainTeed has no log or registry which would enable it to accurately respond to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 53:

None.

RESPONSE TO INTERROGATORY NO. 54:

None.

RESPONSE TO INTERROGATORY NO. 55:

Not applicable.

RESPONSE TO INTERROGATORY NO. 56:

No.

RESPONSE TO INTERROGATORY NO. 57:

See answer to Interrogatory No. 50.

RESPONSE TO INTERROGATORY NO. 58:

See answer to Interrogatory No. 28.

RESPONSE TO INTERROGATORY NO. 59:

Not to the best of our knowledge.

RESPONSE TO INTERROGATORY NO. 60:

See answer to Interrogatory No. 50.

RESPONSE TO INTERROGATORY NO. 61:

No.

RESPONSE TO INTERROGATORY NO. 62:

No.

RESPONSE TO INTERROGATORY NO. 63:

Not applicable.

RESPONSE TO INTERROGATORY NO. 64:

None.

RESPONSE TO INTERROGATORY NO. 65:

See answer to Interrogatory No. 50.

RESPONSE TO INTERROGATORY NO. 66:

See answer to Interrogatory No. 50.

RESPONSE TO INTERROGATORY NO. 67:

See answer to Interrogatory No. 27.

RESPONSE TO INTERROGATORY NO. 68:

None.

RESPONSE TO INTERROGATORY NO. 69:

No.

RESPONSE TO INTERROGATORY NO. 70:

CertainTeed is believed to have had a general awareness of the "threshold limit value" concept, but it has no log or registry that would enable it to respond to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 71:

CertainTeed may have received such information but it has no log or registry that would enable it to respond to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 72:

Unknown.

RESPONSE TO INTERROGATORY NO. 73:

No.

RESPONSE TO INTERROGATORY NO. 74:

Unknown.

RESPONSE TO INTERROGATORY NO. 75:

CertainTeed never so notified asbestos workers with respect to the two specialty insulation products for the railway industry cited in the answer to Interrogatory No. 15.

RESPONSE TO INTERROGATORY NO. 76:

No.

RESPONSE TO INTERROGATORY NO. 77:

To the best of CertainTeed's knowledge, the only individual who has so testified is John P. McGinley, Vice President-Manufacturing of CertainTeed's Pipe & Plastics Group, who testified before OSHA in 1984 concerning the setting of asbestos exposure levels in manufacturing facilities.

RESPONSE TO INTERROGATORY NOS. 78-84:

Do not require a response.

DATED: ~~September~~ October 12, 1995

HAIGHT, BROWN & BONESTEEL

By _____
William J. Sayers
Farah Nicol
Attorneys for Defendants and Cross-Complainants, A.P GREEN INDUSTRIES, INC.; ARMSTRONG WORLD INDUSTRIES, INC.; CERTAINTEED CORPORATION; FLEXITALLIC, INC.; GAF CORPORATION; ASBESTOS CLAIMS MANAGEMENT CORPORATION (Formerly National Gypsum Company); QUIGLEY COMPANY, INC.; T&N, PLC; UNION CARBIDE CHEMICALS AND PLASTICS COMPANY (Formerly Union Carbide Corporation); and, UNITED STATES GYPSUM COMPANY

VERIFICATION

CURTIS M. PONTZ, being duly sworn according to law deposes and says that he is Associate General Counsel and Assistant Secretary of CertainTeed Corporation and is duly authorized to make this Verification on its behalf and that the facts set forth in the foregoing answers to Plaintiffs' Standard Interrogatories are true and correct to the best of his knowledge, information and belief.

CERTAINTEED CORPORATION

BY: Curtis M. Pontz

CURTIS M. PONTZ
Associate General Counsel
and Assistant Secretary

DATE: June 27, 1995

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA)
) ss.:
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1620 26th Street, Suite 4000 North, Santa Monica, California 90404-4038.

On October 31, 1995, I served on interested parties in said action the within:

DEFENDANT CERTAINTEED CORPORATION'S RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES TO DEFENDANTS (FIRST SET)

by placing a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Francine S. Curtis, Esq.
BRAYTON HARLEY CURTIS
999 Grant Avenue
P.O. Box 2109
Novato, California 94948

Jerry Neil Paul, Esq.
LAW OFFICES OF JERRY NEIL PAUL
16830 Ventura Boulevard, Suite 500
Encino, California 91436

and causing such envelope(s) to be deposited in the U.S. Mail at Santa Monica as stated on the attached mailing list.

I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on the 31st day of October, 1995, at Santa Monica, California.

Omar B. de Peralta

POLICY PERIOD	POLICY NO.	INSURER	POLICY TYPE	PER OCC/ACC LIMIT	$ OR COMBINED AGGREGATE
7/01/81-7/01/82	04AL315946SCA (TX & HI only)	AEtna	Product	$ 1mmBI 1mmPD	$ 2mmBI 2mmPD
7/01/81-7/01/82	04GL5545SCA (Except TX & HI)	AEtna	Product	$ 1mmBI 1mmPD	$ 2mmBI 2mmPD
7/01/82-7/01/83	04AL315970SCA (TX & HI only)	AEtna	Product	$ 1mmBI 1mmPD	$ 2mmBI 2mmPD
7/01/82-7/01/83	04GL2377667SCA (Except TX & HI)	AEtna	Product	$ 1mmBI 1mmPD	$ 2mmBI 2mmPD
7/01/83-1/01/85	04AL315998SCA (TX & HI only)	AEtna	Product	$ 1mmBI 1mmPD	$ 3mmBI 3mmPD
7/01/83-1/01/85	04GL4C2016SCA (Except TX & HI)	AEtna	Product	$ 1mmBI 1mmPD	$ 3mmBI 3mmPD
1/01/85-1/01/86	GLA1540153	Nat'l Un.	Product	$ 1mmBI 1mmPD	$ 2mmBI 2mmPD

Exhibit A

POLICY PERIOD	POLICY NO.	INSURER	POLICY TYPE	PER OCC/ACC LIMIT	BI OR COMBINED AGGREGATE
7/01/73-7/01/74	TRNSLP619047	Travelers	Product	$100,000 BI (each person)	
				$ 300mBI	$ 300mBI
				100mPD	100mPD
7/01/74-7/01/75	TRLNSL121T922 974	Travelers	Product	$ 500mBI	$ 1mmBI
				500mPD	1mmPD
7/01/75-7/01/76	TRLNSL121T922 974	Travelers	Product	$ 500mBI	$ 1mmBI
				500mPD	1mmPD
7/01/76-7/01/77	04AL247680SCA	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD
7/01/77-7/01/78	04AL247729SCA	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD
7/01/78-7/01/79	04GL00235CA	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD
7/01/79-7/01/80	04GL1455SCA	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD
7/01/80-7/01/81	04AL3155195CA (TX & HI only)	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD
7/01/80-7/01/81	04GL554225CA (Except TX & HI)	AEtna	Product	$ 1mmBI	$ 2mmBI
				1mmPD	2mmPD

POLICY PERIOD	POLICY NO.	INSURER	POLICY TYPE	PER OCC/ACC LIMIT	BI OR COMBINED AGGREGATE
7/01/72-7/01/73	TRHSL9619047	Travelers	Product	$100mBI (each person) $300mBI 100mPD	$300mBI 100mPD
7/01/71-7/01/72	TRHSL9619047	Travelers	Product	$100mBI (each person) $300mBI 100mPD	$300mBI 100mPD
7/01/70-7/01/71	RHSL40247904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	$300mBI 100mPD
10/1/70-10/1/71	641-004781050	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD
10/1/69-10/1/70	641-004781059	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD
7/01/69-7/01/70	HSL-4020446	Travelers	Product	$100mBI 250mPD	$300mBI 500mPD
7/01/69-7/01/70	RHSL4027904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	$300mBI 100mPD
7/01/68-7/01/69	HSL-4020446	Travelers	Product	$100mBI 250mPD	$300mBI 500mPD
5/15/68-7/01/69	RHSL4027904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	$300mBI 100mPD
10/1/68-10/1/69	641-004781058	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD

POLICY PERIOD	POLICY NO.	INSURER	POLICY TYPE	PER OCC/ACC LIMIT	BI OR COMBINED AGGREGATE
7/01/67-7/01/68	NSL-4020446	Travelers	Product	$100mBI 250mPD	$300mBI 500mPD
5/15/67-5/15/66	RNSL2677904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	 $300mBI 100mPD
10/1/67-10/1/68	641-004781057	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD
10/1/66-10/1/67	641-004781056	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD
5/15/66-5/15/67	RNSL2677904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	 $300mBI 100mPD
10/1/65-10/1/66	641-004781055	Liberty Mutual	Product	$250mBI 500mPD	$250mBI 500mPD
5/15/65-5/15/66	RNSL2677904	Travelers	Product	$100mBI (each person) $300mBI 100mPD	 $300mBI 100mPD
1/01/65-5/15/65	052600027800	Employers of Wausau	Product	$300mBI 100mPD	$300mBI 100mPD
1/01/64-1/01/65	05250003780	Employers of Wausau	Product	$100mBI (each person) $300mBI 25mPD	 $300mBI 50mPD
1/01/62-1/01/64	05240003780	Employers of Wausau	Product	$100mBI (each person) $300mBI	 $300mBI

POLICY PERIOD	POLICY NO.	INSURER	POLICY TYPE	PER OCC/ACC LIMIT	BI OR COMBINED AGGREGATE
1/01/62-1/01/63	052000037800	Employers of Wausau	Product	$100mBI (each person) $300mBI	$300mBI
1/01/61-1/01/62	052000037800	Employers of Wausau	Product	$100mBI (each person) $300mBI	$300mBI
1/01/60-1/01/61	052000037800	Employers of Wausau	Product	$100mBI (each person) $300mBI	$300mBI
1/01/59-1/01/60	052000037800	Employers of Wausau	Product	$100mBI (each person) $300mBI	
1/01/58-1/01/59	052000037800	Employers of Wausau	Product	$100mBI (each person) $300mBI	

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