IN RE:	ALL ASBESTOS-RELATED PERSONAL INJURY OR DEATH CASES FILED OR TO BE FILED IN DALLAS COUNTY, TEXAS	§ § § § §	IN THE DISTRICT COURTS OF DALLAS COUNTY, TEXAS 160TH JUDICIAL DISTRICT

DEFENDANT CROWN CORK & SEAL COMPANY, INC., ANSWERS TO PLAINTIFFS' MASTER INTERROGATORIES AND REQUESTS FOR PRODUCTION PROPOUNDED BY PLAINTIFFS

TO: PLAINTIFFS, by and through their counsel of record, Russell W. Budd, Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

Pursuant to Rule 168 of the Texas Rules of Civil Procedure, these responses are hereby made by the Defendant, Crown Cork & Seal Company, Inc., in response to the Interrogatories and Request for Admissions made by Plaintiffs.

INTERROGATORIES

INTERROGATORY NO. 1:

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

ANSWER: Richard Krzyzanowski

P.O. Box 6208
Philadelphia, PA. 19136

Secretary

MAY 22 1992

Employed since 09/05/67

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on

PLAINTIFF'S EXHIBIT CCS-17

your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Crown Cork & Seal Company, Inc.
New York
Philadelphia, PA

CT Corporation - Dallas, Texas

Yes

INTERROGATORY NO. 3:

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

ANSWER: Crown Cork & Seal Company, Inc. has never manufactured, processed, sold or distributed asbestos products. In November of 1963, Crown Cork & Seal purchased some stock of Mundet Cork Corporation. Mundet Cork Corporation continued to exist and at that time had two divisions: a Cork Products Division and a Thermal Insulation Contract Division. This purchase by Crown Cork & Seal Company, Inc. was done for the purpose of acquiring Mundet Cork Corporation's Cork Products Division, which fit into Crown Cork & Seal's line of business. Crown Cork & Seal Company, Inc. has no interest in acquiring or in having anything to do with the Thermal Insulation Contract Division.

The Thermal Insulation Contract Division of Mundet Cork Corporation may have manufactured, processed, sold or distributed some asbestos products, but we are not even sure that this is the case since Crown Cork & Seal Company, Inc. had no interest in that division. The Cork Products Division did not manufacture, process, sell or distribute any asbestos products.

Immediately after the acquisition by Crown Cork & Seal Company, Inc. of some stock in Mundet Cork Corporation, the latter company halted the operation of the Thermal Insulation Contract Division and began looking for a purchaser of that division. Less than three months later, on February 8, 1964, Mundet Cork Corporation sold the entire Thermal Insulation Contract Division to Baldwin-Ehret-Hill, Inc. Pursuant to that sale, Baldwin-Ehret-Hill, Inc. took over all of the equipment, inventory, contracts and all personal property, including all files and records of the Thermal Insulation Contract Division. As a consequence, Crown Cork & Seal Company, Inc. has no records or documents.

Almost 1-1/2 years later, in December of 1965, Mundet Cork Corporation, which at that time had only one division, i.e., Cork Products Division, ceased to exist and the assets of that division were transferred to Crown Cork & Seal Company, Inc.

The information requested in this Interrogatory and other Interrogatories is not known to us, and we have no means at present of answering this Interrogatory as it relates to Mundet Cork Corporation. We repeat, however, that Crown Cork & Seal Company, Inc. has not manufactured, processed, sold or distributed any asbestos products since its incorporation.

INTERROGATORY NO. 4:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 5:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 6:

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

A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.

B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.

C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.

D. The date each of the names products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product of the percentage of asbestos put in each product.

F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

G. The date asbestos was removed from such products, if ever, and the reasons therefor.

H. A description of the physical appearance of each of the named products.

I. A detailed description of the intended uses of the named products.

J. Identify the last year that you sold each asbestos-containing product.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design,

preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

A. A description of each such document.

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 8

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

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

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

C. The results of the tests.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character,r relating to the

testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

A. A description of each such document.

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 10:

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

A. The trade names of the products changed.

B. The nature of the changes made and the date of such changes or modifications.

C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 11:

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

A. The names of the products tested and the dates of such tests.

B. The name, address, and job title of each person who conducted those tests.

C. The results of those tests.

D. Whether, as a result of the tests, any products were removed from the market.

E. The names of all products removed from the market as a result of these tests.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 12:

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

A. The name of each product.

B. A description of each document and how it relates to each product.

C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 10 or 13? If the answer is affirmative, state:

A. The names of the products changed or modified.

B. The name, address, and job title of each person responsible for having made a change or modification.

C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 14:

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

A. The names of each relevant product.

B. The exact wording of each warning statement on each printed material.

C. A description of the printed material other than the warning statement.

D. The method used to distribute the warning to persons likely to use the product.

E. The date each warning was first issued, distributed, or placed on packaging.

F. The name, address, and job title of each person responsible for having drafted or issued the warning.

G. The current location of any such printed material and the custodian thereof.

H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 15:

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

A. The name and address of each claimant.

B. The date of notice of each claim.

C. A description of the claim.

D. The type of injuries allegedly sustained.

E. The name and address of each attorney who represents each individual making a claim.

F. The style and court number of each claim.

G. The disposition of each claim that has been settled or taken to judgment.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the

answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 17:

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

A. The name and address of each such distributor or sales representatives.

B. The years in which such company or person distributed, marketed, or sold your products.

C. What products were distributed, marketed, or sold and in what years.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 18:

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

ANSWER: None - See also Response to Interrogatory No. 3.

INTERROGATORY NO. 19:

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

A. The name of each such publication.

B. The date of publication and the names of the author and publisher (if any).

C. The date received by Defendant, if known.

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

ANSWER: Not applicable

INTERROGATORY NO. 20:

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

A. The name and address of each such association or organization.

B. The dates during which Defendant or any of its subsidiaries or predecessors were members.

C. The names and dates of any publications, minutes, or reports published, written, or

D. Whether any of those publications are still in your possession, and if so:

1. A description of the publications, including the date.
2. The current location of such publications.
3. The custodian of such publications.
4. The method or manner in which such publications are maintained.

ANSWER: No - See Response to Interrogatory No. 3.

INTERROGATORY NO. 21:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 22:

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

A. The name, address, and job title of each person or entity who prepared such materials.

B. The name, address, and job title of each person who currently has possession of such materials and their present location.

C. The date the materials were prepared.

D. The media used to disseminate the sales materials.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 23:

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

A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.

B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.

C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 24:

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

ANSWER: This Defendant objects to this interrogatory because same is overreaching, burdensome, oppressive and irrelevant to the subject litigation. Without specific information concerning the applicable time period. This Defendant can not respond to this interrogatory at this time.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the existence of the disease.

C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.

F. Who is the custodian of such information.

G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: This Defendant has never been involved in the production of asbestos-containing products of any type and, therefore, information is limited. However, it is generally understood that respirable asbestos particles can present the potential for respiratory illness under certain circumstances. See Response to Interrogatory No. 3.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was cause by inhalation of asbestos fibers by humans.

B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.

C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.

F. Who is the custodian of such information.

G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: See Response to Interrogatory No. 25.

INTERROGATORY NO. 27:

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

A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

F. Who is the custodian of such information.

ANSWER: See Response to Interrogatory No, 25.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.

B. The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.

C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.

G. Who is the custodian of such information.

H. Whether Defendant agrees that ,there is no known medical cure for mesothelioma.

ANSWER: See Response to Interrogatory No. 25.

INTERROGATORY NO. 29:

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

A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

G. Who is the custodian of such information.

ANSWER: See Response to Interrogatory No. 25.

INTERROGATORY NO. 30:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 31:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 32:

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

A. The name of the company manufacturing the asbestos products.

B. The trade name affixed to those products.

C. The periods of time covered by each such agreement.

D. The volume, in dollar amount, of each transaction.

E. The initial purchaser of the products.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 34:

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

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

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 35:

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

A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.

B. The disease alleged in each such claim.

C. A brief summary of the disposition of each such claim.

D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 36:

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

A. The dates of each such meeting.

B. The general subject matter discussed at each meeting.

C. Who was in attendance at each meeting.

D. Where and by whom the written minutes are presently maintained.

E. By whom the minutes were taken and put into final format.

F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 37:

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

A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.

B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.

C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.

F. A description of the physical appearance of each product and its packaging.

G. A detailed description of the intended uses of each of the named products.

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 38:

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

A. The location of such documents.

B. The name and address of the custodian of the documents.

C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.

D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 39:

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

A. The name, address, and job title of each company representative who may be called.

B. A summary of the testimony expected to be given by each such witness.

C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER: A. Richard Krzyzanowski
P.O. Box 6208
Philadelphia, PA 19136
Secretary

B. Mr. Krzyzanowski can explain corporate history as set out in the response to Interrogatory No. 3.

C. None

INTERROGATORY NO. 40:

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

A. Full and correct name;

B. Principal place of business;

C. State of incorporation;

D. Date of acquisition by Defendant;

E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 41:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 42:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 43:

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

A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.

B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 44:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 45:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 46:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 47:

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

A. Name of the person or firm conducting such studies:

B. The date the studies began and the date they were completed;

C. Any publication or other written dissemination of the results of the studies;

D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 48:

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

A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?

B. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?

C. State in detail the purposes, duties, and responsibilities or such Research Department.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 49:

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

A. The year such Medical Department was established;

B. Whether or not such Medical Department has operated continuously since being established;

C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;

D. State the duties and responsibilities of such Medical Department.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 50:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 51:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 52:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 53:

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

A. All details of such recall;

B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;

C. The dates of recall;

D. The purpose for the recall.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 54:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 55:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 56:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 57:

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

A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;

B. The name of the employee or official of the company receiving such advice;

C. How Defendant received notice of such limits or concentrations.

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 63 for total dust, and not asbestos dust alone?

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 59:

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

ANSWER: See Response to Interrogatory No. 3.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness that you may call during trial of these cases. Please designate

with specificity the expert witnesses that you will call, including:

(a) The name, address, and job classification of each such expert witness;

ANSWER: This Defendant adopts the response of each and every party to this litigation as though set forth fully herein.

(b) The subject matter on which the expert is expected to testify;

ANSWER: This Defendant adopts the response of each and every party to this litigation as though set forth fully herein.

(c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;

ANSWER: This Defendant adopts the response to each and every party to this litigation as though set forth fully herein.

(d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;

ANSWER: This Defendant adopts the response to each and every party to this litigation as though set forth fully herein.

(e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;

ANSWER: This Defendant adopts the response to each and every party to this litigation as though set forth fully herein.

(f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by

any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER: This Defendant adopts the response to each and every party to this litigation as though set forth fully herein.

INTERROGATORY NO. 61:

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

(a) identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.

ANSWER: The Plaintiff, the Plaintiff's co-workers, any person previously listed in answers to these interrogatories and further, this Defendant adopts the responses of each every party to this litigation as though fully set forth herein.

(b) each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;

ANSWER: The Plaintiff, the Plaintiff's co-workers, any person previously listed in answers to these interrogatories and further,

this Defendant adopts the responses of each every party to this litigation as though fully set forth herein.

(c) the negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;

ANSWER: The Plaintiff, the Plaintiff's co-workers, any person previously listed in answers to these interrogatories and further, this Defendant adopts the responses of each every party to this litigation as though fully set forth herein.

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

ANSWER: The Plaintiff, the Plaintiff's co-workers, any person previously listed in answers to these interrogatories and further, this Defendant adopts the responses of each every party to this litigation as though fully set forth herein.

INTERROGATORY NO. 62:

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

ANSWER: This Defendant adopts the response of each and every party to this litigation as though same were fully set forth herein.

INTERROGATORY NO. 63:

Please state when you first received a copy of the Fleischer/Drinker Report published in 1945/1946.

ANSWER: See Response to Interrogatory No. 3.

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

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

ANSWER: Crown Cork & Seal Company, Inc. has never manufactured, processed, sold or distributed asbestos products. In November of 1963, Crown Cork & Seal purchased some stock of Mundet Cork Corporation. Mundet Cork Corporation continued to exist and at that time had two divisions: a Cork Products Division and a Thermal Insulation Contract Division. This purchase by Crown Cork & Seal Company, Inc. was done for the purpose of acquiring Mundet Cork Corporation's Cork Products Division, which fit into Crown Cork & Seal's line of business. Crown Cork & Seal Company, Inc. has no interest in acquiring or in having anything to do with the Thermal Insulation Contract Division.

The Thermal Insulation Contract Division of Mundet Cork Corporation may have manufactured, processed, sold or distributed some asbestos products, but we are not even sure that this is the case since Crown Cork & Seal Company, Inc. had no interest in that division. The Cork Products Division did not manufacture, process, sell or distribute any asbestos products.

Immediately after the acquisition by Crown Cork & Seal Company, Inc. of some stock in Mundet Cork Corporation, the latter company halted the operation of the Thermal Insulation Contract Division and began looking for a purchaser of that division. Less than three months later, on February 8, 1964, Mundet Cork Corporation sold the entire Thermal Insulation Contract Division to Baldwin-Ehret-Hill, Inc. Pursuant to that sale, Baldwin-Ehret-Hill, Inc. took over all of the equipment, inventory, contracts and all personal property, including all files and records of the Thermal Insulation Contract Division. As a consequence, Crown Cork & Seal Company, Inc. has no records or documents.

Almost 1-1/2 years later, in December of 1965, Mundet Cork Corporation, which at that time had only one division, i.e., Cork Products Division, ceased to exist and the assets of that division were transferred to Crown Cork & Seal Company, Inc.

The information requested in this Interrogatory and other Interrogatories is not known to us, and we have no means at present of answering this Interrogatory as it relates to Mundet Cork Corporation. We repeat, however, that Crown Cork & Seal Company, Inc. has not manufactured, processed, sold or distributed any asbestos products since its incorporation.

REQUEST FOR PRODUCTION NO. 2:

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

ANSWER: See Response to Request for Production No. 1.

Respectfully submitted,

FOLEY & BOYD, P.C.

BY: _____
James T. Foley
First City Place, Suite 404
Tyler, Texas 75702
(903) 593-8883
(903) 593-1099 (Fax)

State Bar No. 07208500

ATTORNEY FOR DEFENDANT, CROWN CORK & SEAL COMPANY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on Plaintiff's counsel of record, by Certificate Return Receipt Requested United States Mail on this the 21st day of May, 1992.

_____
James T. Foley

STATE OF PENNSYLVANIA §
§
COUNTY OF PHILADELPHIA §

BEFORE ME, the undersigned authority, on this day personally appeared RICHARD L. KRZYZANOWSKI, who, being by me duly sworn, on oath states that he is the Secretary of Crown Cork & Seal Company, Inc.; that he has the authority to make this affidavit; and that he has read the above and foregoing Defendant Crown Cork & Seal Company, Inc.'s Answers to Plaintiffs' First Set of Interrogatories, and that said answers are true and correct.

Richard L. Krzyzanowski
RICHARD L. KRZYZANOWSKI
Affiant

SUBSCRIBED AND SWORN TO before me by the said RICHARD L. KRZYZANOWSKI, Secretary of Crown Cork & Seal Company, Inc., on this the 1st day of May, 1992, to certify which witness my hand and official seal of office.

Matthew R. Nardi
NOTARY PUBLIC IN AND FOR THE STATE OF PENNSYLVANIA

MY COMMISSION EXPIRES: 2/13/95

NOTARIAL SEAL
MATTHEW R. NARDI, Notary Public
PHILADELPHIA, PHILADELPHIA COUNTY
My Commission Expires February 13, 1995