IN THE CIRCUIT COURT
FOR THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

ALL ASBESTOS LITIGATION IN MADISON COUNTY)

GARLOCK INC'S RESPONSE TO COURT ORDER OF NOVEMBER 17, 1987 REGARDING ASBESTOS-CONTAINING PRODUCTS

Comes now Garlock Inc ("Garlock") and states as follows in compliance with this Court's Order of November 17, 1987 regarding asbestos-containing products: Garlock has produced several hundred products which contained asbestos fibers in one form or another. The majority of these products were made by Garlock Mechanical Packing Division, and the first portion of this product description is divided into the four product groups made by that division. This listing was prepared from existing records and although it does not include all asbestos products ever manufactured, it is fully believed to encompass well over 90% of all sales of asbestos-containing products since the time of World War II.

GARLOCK MECHANICAL PACKING

Compression Packings - There are four general product groups within the Compression Packing group which included products containing asbestos. These are furnished in ring form or in longer lengths from which users may cut their own rings. Manufacture of products in each of these groups began prior to 1933. Within the past several years, all of the asbestos-containing products in these four groups have been discontinued. The four groups are:

Braided Packings - Asbestos yarns were braided and lubricated with such materials as oils, waxes, PTFE and graphite. Some of the styles had yarns with copper, brass, Monel or Inconel wire insertions. Representative styles were 5862, 733 and 234. 25%-65% asbestos (by weight). Other significant styles have been:

17	163	239	257	734	5414
114	176	243	258	736	5482
115	230	244	266	737	5779
117B	231	245	644	1700	5861
117T	233	248	646	5022	5875
160	235	249	730	5234	5876
161	237	252	731	5354	5880
162	238	256	732	5373	5884

Fabric and Rubber Packings - Asbestos fabric was first impregnated with an elastomeric compound and then either laminated with additional elastomeric material or else rolled and/or folded with other components to form a coil of resilient material. These packings were normally lubricated and graphited. Sometimes the yarn from which the cloth was made was wire-inserted. Representative styles were 7130, 150 and 144. 25%-65% asbestos (by weight). Other significant styles have been:

125	343
145	356
146	357
200	358
220	377
221	7051
222	

Flexible Metallic Packings - Most of these had a braided asbestos core with a twisted metal foil jacket. However, soft metal strands and asbestos yarns were twisted together and braided for some styles. These packings were usually lubricated and graphited. Representative styles were 631, 633 and 644. 10%-50% asbestos (by weight). Other significant styles have been:

635	915
906	916
907	917
913	918
914	920

Plastallic Packings - These packings were made with asbestos fibers mixed with a variety of ingredients, such as elastomers, oils and greases, metallic particles and graphite. Some styles had a complete braided jacket, some had a skeleton braided jacket and some had no jacket. Representative styles were 908, 926 and 127. 35%-65% asbestos (by weight). Other significant styles have been:

166	929
167	930
909	931
910	7276
927	5855
928	5901

Expansion Joints - The standard construction of most of our expansion joints and flexible couplings calls for polyester

or glass fabric. Elastomeric materials are used to encapsulate and bond the fabric portions and include chlorobutyl, neoprene and fluorelastomers. The fabric and rubber materials are laminated and vulcanized to produce a tough and unitary structure. Representative styles which used to be furnished with asbestos fabrics on special order are 204 and 9278. Less than 25% asbestos (by weight). Manufacture of the products in this group began in approximately 1950 and the use of asbestos was discontinued in about 1978. Other significant styles have been:

8400

Industrial Packings - Within this product group, gasketing materials and formed gaskets, all of various constructions, are included. Except as noted, products of these types have been produced since before 1933. They may be described as follows:

Compressed Asbestos Sheet and Gaskets - Asbestos fibers are mixed with elastomeric binders and other fillers and formed into large sheets. Substantial pressure is applied to compress the material and heat is applied to cure the elastomeric material. A tough durable product results and gaskets are cut from the finished sheet. Sometimes we cut the gaskets; at other times, we supply the sheet to others and they cut the gaskets. All current styles use only white chrysotile asbestos fibers. A variety of elastomers and other materials are used according to the chemical resistance and temperature resistance that may be necessary. The surfaces are treated to reduce any tendency to adhere to flanges in service. The most popular styles are 900/7735, 7021 and 7228. Style 7705 was made with blue asbestos fiber and was intended for use in highly acidic conditions. 65%-85% asbestos (by weight). Other significant styles have been:

900T	7006	7844
902	7009	8746
903	7021T	8748
903S	7026	9053
950	7098	9057
1000w/wire	7226	9058
1674	7405	9531
7000	7736	9532
7003	7772	9533
7005	7819	

Woven Asbestos and Rubber Gaskets - Woven asbestos cloth, sometimes with wire insertions, is impregnated with a variety of elastomeric materials and then cut and/or folded to make gaskets and tapes of specified sizes. Representative styles are 604 and 612. 40%-65% asbestos (by weight). Other significant styles have been:

601	5436	7730
602	7051	7771
603	7170	7807
605	7174	7817
606	7176	7896
608	7367	7953
609	7424	8240
610	7601	8258
616	7604	8325
617	7611	8416
625	7635	8602
5435	7696	8682
		9130

Spiral Wound Gaskets - The standard construction consists of alternating plies of steel ribbon and asbestos paper wound helically to finished sizes. Other metals may be used, as may other fillers, as necessary for severe applications. Manufacture of such gaskets began in approximately 1933. A representative style is 555. 5%-10% asbestos (by weight). Other significant styles have been:

None.

Hydraulic Components - Various hydraulic component products have been manufactured, beginning in approximately 1933. Sales of products containing asbestos within this group have been minimal, but, for convenience, they will be divided into two groups as follows:

Asbestos Fabric and Rubber - Asbestos fabrics are impregnated with various elastomeric materials, rolled or folded and then molded into a variety of forms such as V rings, cups and U packings. Representative styles were 532 (now 536), 813 and 7904. 25%-65% asbestos (by weight). Other significant styles have been:

530	7389
531	7423
536	8170

813A	8190
814	8412
7262	8527
	8940

Homogeneous Fiber and Rubber - Elastomeric material is compounded in the uncured state with asbestos fibers and the resulting homogeneous material is then molded into finished shapes such as V rings and cups. A representative style was 7815. 25%-65% asbestos (by weight). Other significant styles have been:

8157
9141
9493

MISCELLANEOUS

Although Garlock did not carry it as a standard product item, Garlock, from time to time beginning in the mid-1960's, sold small amounts of excess asbestos cloth to manufacturers of sealing products and protective clothing. This cloth was the same type which was used to manufacture style 604 and 605 gaskets, mentioned above.

OTHER DIVISIONS

In addition to the above products made by Garlock Mechanical Packing Division, the Valves and Industrial Plastics Unit of Garlock Special Products Division makes TFE envelope gaskets with a number of internal fillers and several of these contained asbestos. Asbestos materials used were compressed asbestos sheet, woven asbestos and felted asbestos. The latter two materials had a latex surface treatment. Manufacture of this type began in the 1940's and those which contained asbestos were from 20% to 40% asbestos (by weight). These and many other (non-asbestos containing) TFE products were designated as style 8764.

STATE OF NEW YORK)
) SS.
COUNTY OF WAYNE)

Richard W. Watson, being duly sworn on his oath, states that he is a Patent Agent and Paralegal of Garlock Inc; that in that capacity, he has read the foregoing Response to Court Order; and that the facts contained in this response were derived from the files and records of Garlock Inc and are true to the best of his knowledge, information and belief.

Richard W. Watson

Subscribed and sworn to before me, a Notary Public, this 11th day of December, 1987.

Ann F. Zehr
Notary Public

My Commission Expires:

10-30-88

ANN F. ZEHR
NOTARY PUBLIC, State of New York, Wayne County
My Commission Expires [redacted] 30, 19 88
Oct.