

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

HERMAN A. DENDINGER, et al.,	)	Case No. C 84-7854
	)	[Hon. Nicholas J. Walinski]
Plaintiffs,	)	
vs.	)	RESPONSE OF DEFENDANT UNIROYAL,
	)	INC. TO PLAINTIFFS' REQUESTS
CHRYSLER PLASTIC PRODUCTS	)	FOR PRODUCTION OF DOCUMENTS
CORPORATION, et al.,	)	DIRECTED TO ALL DEFENDANT
	)	<u>PVC MANUFACTURERS</u>
Defendants.	)	

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Now comes defendant Uniroyal, Inc. and for its response to plaintiffs' requests for production of documents, states as follows:

1. All records of sales, direct or indirect, of Polyvinyl Chloride (PVC) resin from you to Chrysler Plastic Products Corporation (Chrysler) between January 1, 1967 and December 31, 1980.

ANSWER:

Records containing such information are available for inspection and copying at Uniroyal's World Headquarters, Middlebury, Connecticut.

2. All documents indicating the extent to which PVC resin sales to Chrysler during the time period indicated above, represented sales of PVC resin manufactured in the: (a) suspension; (b) emulsion; (c) bulk; or, (d) solution process.

ANSWER:

See response to Request for Production No. 1.

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3. All documents indicating the extent to which PVC resin sales to Chrysler during the time period specified in request number 1, were of (a) Homopolymer; (b) copolymer; or, (c) terpolymer.

ANSWER:

See response to Request for Production No. 1, and Attachment 1.

4. All written documents indicating, with respect to PVC resin sold to Chrysler during the time period specified above, the size (in microns) of the resin sold.

ANSWER:

See response to Request for Production No. 1, and Attachments 1 and 2.

5. All written documents indicating the results of any tests done on any PVC resin by you or any other entity to determine the concentration (in parts per million) of residual vinyl chloride monomer in PVC resin of the type sold to Chrysler during the time period specified in request number 1.

ANSWER:

See answer to Interrogatory No. 10.

6. All Material Safety Data Sheets published by you prior to January 1, 1986, relating to any PVC resin manufactured by you.

ANSWER:

Objection, any Material Safety Data Sheet published subsequent to 1980, the last date of exposure in this case, is irrelevant. See Attachment 3.

7. All documents in your possession indicating the dates of manufacture and the dates of shipment of PVC resin sold to Chrysler.

ANSWER:

See answer to Interrogatory No. 12.

8. All written results of any testing done on the PVC resin identified in the prior request to determine the concentration of residual vinyl chloride monomer.

ANSWER:

See answer to Interrogatory No. 10.

9. All documents sent by you to the Occupational Safety & Health Administration, relating, in any way, to PVC.

ANSWER:

See Attachment 4.

10. All documents reporting or summarizing efforts taken by you, at any time since January 1, 1967 to reduce the percentage of residual vinyl chloride monomer in PVC resin manufactured by you.

ANSWER:

See answer to Interrogatory No. 10.

11. Each and every document sent to Chrysler,
informing Chrysler of any known or potential human health hazard
relating to exposure or over exposure to vinyl chloride monomer.

ANSWER:

See answer to Interrogatory No. 14.

STATE OF CONNECTICUT)
COUNTY OF NEW HAVEN)

ss

Middlebury

VERIFICATION

BENTON R. LEACH, being duly sworn, deposes and says that he is Corporate Director, Health, Safety and Environmental Affairs of Uniroyal Chemical Company, Inc. and that he has read the foregoing Responses to Request to Produce and is familiar with the contents thereof. He further states that he is informed and believes that the matters stated therein are true and on that ground he alleges that the matters stated therein are true.

Benton R. Leach
Benton R. Leach

Sworn to before me this 25 day
of September, 1986.

Madeline Pazzani
Notary Public

MADELINE PAZZANI
Notary Public

My commission expires March 31, 1990

AS TO OBJECTIONS:

Of Counsel For Defendants
The BFGoodrich Co., The
Goodyear Tire & Rubber Co.,
Firestone Tire & Rubber Co.,
Conoco, Inc., Uniroyal, Inc.,
Union Carbide Corp., and
Diamond Shamrock Corp.:

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Union Carbide Corp., and
Diamond Shamrock Corp.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Responses to Plaintiff's Requests for Production of Documents Directed to all Defendant PVC Manufacturers was mailed by United States mail, postage prepaid, to Kirk J. Delli Bovi, Esq., attorney for plaintiff, at his office located at Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio 44870, and to defense counsel as set forth in the attached Schedule of Service this 17th day of October, 1986.

Robert A. Bunda
An Attorney for Defendants
The Goodyear Tire & Rubber
Company, The BFGoodrich
Company, Firestone Tire &
Rubber Company, Conoco,
Inc., Uniroyal, Inc., Union
Carbide Corporation, and
Diamond Shamrock Corp.

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