

10/8/03

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

GORDON DAVID THOMPSON and BESSIE M. THOMPSON	*	CIVIL ACTION
	*	NO. 93-809
VERSUS	*	SECTION: "B"
CONOCO INCORPORATED, ET AL	*	MAG. NO. 2

CONOCO INC.'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' REQUEST FOR ADMISSIONS

NOW INTO COURT, through undersigned counsel, comes defendant, Conoco Inc. ("Conoco"), which provides this response to Plaintiffs' Request for Admissions. Conoco reserves the right to supplement this discovery at any time prior to trial. The requests and corresponding objections are as follows:

GENERAL OBJECTIONS

Conoco Inc. objects to each and every Request for Admissions propounded by plaintiffs to the extent any request seeks information: (1) from companies other than Conoco Chemicals; (2) regarding facilities other than the Aberdeen, Mississippi facility; (3) for a time period beyond the plaintiff's employment there and beyond Conoco Chemicals' ownership of the Aberdeen, Mississippi facility; (4) regarding a condition other than that allegedly contracted by the plaintiff; and concerning employees other than the plaintiff since each individual's medical history, work conditions, etc., vary and those employees are entitled to a right to privacy, all pursuant to Rules 36 and 26(b)(1) of the Federal Rules of Civil Procedure.

R&S163105

DEFINITIONS

DEFINITION NO. 4:

"YOU" or "YOURS" or "YOUR COMPANY" or "DEFENDANT" unless limited by the wording of the question, should be understood as referring to the named Defendant upon whom these Requests for Admissions are served, including all parent corporations, subsidiaries, divisions, predecessors in interest, and successors in interest and including the directors, officers, employees, agents, servants, and representatives of these companies, inclusively.

OBJECTION:

This definition is objected to pursuant to Rules 36 and 26(b)(1) of the Federal Rules of Civil Procedure. Defendant generally objects to Definition No. 4 on the grounds that numerous entities contained within said definition have not been named as parties to this action. Defendant agrees to answer these Request for Admissions on behalf of itself and any subsidiary or predecessor company previously owned and operated by this Defendant and which company employed Plaintiff.

DEFINITION NO. 5:

"VINYL CHLORIDE FACILITY" refers to any and all facilities operated by this defendant at any time between 1948 to present, whereby Vinyl Chloride was used, produced, manufactured and/or stored.

OBJECTION:

This definition is objected to pursuant to Rules 36 and 26(b)(1) of the Federal Rules of Civil Procedure. Defendant generally objects to the definition of "VINYL CHLORIDE FACILITY" on the grounds that Plaintiff did not work in each and every vinyl chloride facility of Defendant but was employed only by Defendant at that vinyl chloride facility located in Aberdeen, Mississippi. Furthermore, Defendant objects to

responding to any Request for Admission for any time frame prior to 1969 or after 1983 on the grounds that it was only in the 1969-1983 time frame wherein Plaintiff was employed by Defendant. Defendant agrees to respond to these Request for Admissions for the time frame 1969-1983 and as they pertain to Defendant's facility in Aberdeen, Mississippi.

DEFINITION NO. 6:

"EXECUTIVE OFFICERS" includes Chief Executive Officers, Presidents, Vice Presidents, Department Heads, Medical Directors, Industrial Hygienist, Safety Personnel, Superintendents, Nurses and/or Supervisors of your company (as defined above by definition "C").

OBJECTION:

This definition is objected to pursuant to Rules 36 and 26(b)(1) of the Federal Rules of Civil Procedure. Defendant objects to the definition of "EXECUTIVE OFFICERS" to the extent said definition is in contravention of the judicially adopted definition of the States of Louisiana and/or Mississippi.

REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Do you admit that this defendant has been correctly named as a defendant in the present cause, in so far as the legal designation of the name is concerned?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 2:

Do you admit that this defendant has been correctly served as a party defendant in the present cause?

RS163107

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 3:

Do you admit that this defendant has done in excess of \$10,000.00 per year worth of business with the United States of America and/or any political subdivision thereof in:

- a. 1960
- b. 1961
- c. 1962
- d. 1963
- e. 1964
- f. 1965
- g. 1966
- h. 1967
- i. 1968
- j. 1969
- k. 1970
- l. 1971
- m. 1972
- n. 1973
- o. 1974
- p. 1975
- q. 1976
- r. 1977
- s. 1978
- t. 1979
- u. 1980
- v. 1981
- w. 1982
- x. 1983
- y. 1984
- z. 1985
- aa. 1986
- bb. 1987
- cc. 1988
- dd. 1989
- ee. 1990
- ff. 1991
- gg. 1992
- hh. 1993

R&S163108

RESPONSE:

Defendant reiterates its general objections. Defendant further states that the Request for Admission is irrelevant for the time frame 1960 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 3 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 4:

Do you admit that your company used Vinyl Chloride at your Vinyl Chloride facility in:

- a. 1947
- b. 1948
- c. 1949
- d. 1950
- e. 1951
- f. 1952
- g. 1953
- h. 1954
- i. 1955
- j. 1956
- k. 1957
- l. 1958
- m. 1959
- n. 1960
- o. 1961
- p. 1962
- q. 1963
- r. 1964
- s. 1965
- t. 1966
- u. 1967
- v. 1968
- w. 1969
- x. 1970
- y. 1971
- z. 1972
- aa. 1973
- bb. 1974
- cc. 1975
- dd. 1976
- ee. 1977
- ff. 1978

R&SI63109

gg. 1979
hh. 1980
ii. 1981
jj. 1982
kk. 1983
ll. 1984
mm. 1985
nn. 1986
oo. 1987
pp. 1988
qq. 1989
rr. 1990
ss. 1991
tt. 1992
uu. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 4 is irrelevant for that time frame of 1947 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 4 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 5:

Do you admit that your company stored Vinyl Chloride at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964

R&S163110

r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 5 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 5 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 6:

Do you admit that your company handled Vinyl Chloride at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950

RS163111

d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 6 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this

R&S163112

Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 6 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 7:

Do you admit that your company transported Vinyl Chloride at or from your Vinyl Chloride facility in:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983
- kk. 1984
- ll. 1985
- mm. 1986
- nn. 1987

R&S163113

oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 7 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 7 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 8:

Do you admit that your company manufactured Vinyl Chloride at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973

R&SI63114

aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 8 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 8 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 9:

Do you admit that your company used Vinyl Chloride containing products at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959

R&S163115

m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 9 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 9 for the time frame 1969 through 1983, inclusive.

R&SI63116

REQUEST FOR ADMISSION NO. 10:

Do you admit that your company stored Vinyl Chloride containing products at your Vinyl Chloride facility in:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983
- kk. 1984
- ll. 1985
- mm. 1986
- nn. 1987
- oo. 1988
- pp. 1989
- qq. 1990
- rr. 1991

R&SI63117

ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 10 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 10 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 11:

Do you admit that your company handled Vinyl Chloride containing products at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977

R&SI63118

ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 11 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 11 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 12:

Do you admit that your company transported Vinyl Chloride containing products at or from your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963

R&SI63119

q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 12 is irrelevant for that time frame of 1948 through 1968 and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 12 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 13:

Do you admit that your company manufactured Vinyl Chloride containing products at your Vinyl Chloride facility in:

a. 1948
b. 1949

R&SI63120

c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further states that Request for Admission No. 13 is irrelevant for that time frame of 1948 through 1968

R&S163121

and 1984 through 1993 on the ground that Plaintiff was not an employee of this Defendant during that time. Subject to its objections, Defendant admits Request for Admission No. 13 for the time frame 1969 through 1983, inclusive.

REQUEST FOR ADMISSION NO. 14:

Do you admit that your company recognizes that there was an association between an exposure to Vinyl Chloride and:

- a. Acute myelogenous leukemia
- b. Leukemia
- c. Lymphoma
- d. Disorders of the hemopoietic system
- e. Disorders of the lymphatic system
- f. Brain cancer
- g. Astrocytoma
- h. Glioblastoma
- i. Angio sarcoma

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 14 on the grounds that said request is vague and ambiguous, because no time frame is given in the Request for Admission. Defendant further objects to Request for Admission No. 14(a)-(f) and 14(h)-(i) as being irrelevant to the extent that it seeks this defendant to admit facts regarding conditions from which Plaintiff allegedly does not suffer. Subject to its objections, Defendant denies Request for Admission No. 14(g).

REQUEST FOR ADMISSION NO. 15:

Do you admit that any person or entity has ever affirmatively indicated to you that the following conditions may result from exposure to Vinyl Chloride:

- a. Acute myelogenous leukemia
- b. Leukemia
- c. Lymphoma
- d. Disorders of the hemopoietic system
- e. Disorders of the lymphatic system
- f. Brain cancer

R&S163122

- g. Astrocytoma
- h. Glioblastoma
- i. Angio sarcoma

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 15 on the grounds that said request is vague and ambiguous, because no time frame is given in the Request for Admission. Defendant further objects to Request for Admission No. 15(a)-(f) and 14(h)-(i) as being irrelevant to the extent that it seeks this defendant to admit facts regarding conditions from which Plaintiff allegedly does not suffer. Subject to its objections, Defendant denies Request for Admission No. 15(g).

REQUEST FOR ADMISSION NO. 16:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through the present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 17:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948

R&SI63123

through the present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 18:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through the present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 19:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948

R&SI63124

through the present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 20:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through the present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 21:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948

R&S163125

through the present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 22:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through the present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 23:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948

R&SI63126

through the present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 24 is denied.

REQUEST FOR ADMISSION NO. 24:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through the present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 25:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

R&S163127

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 26:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 27:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride containing products?

R&SI63128

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 28:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 29:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride containing products?

R&S163129

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 30:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 31:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride containing products?

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RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 31 is denied.

REQUEST FOR ADMISSION NO. 32:

Do you admit that any physician, nurse or other health care provider employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride containing products.

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 41:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the

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present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 42:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 43:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

R&S163132

irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 44:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 45:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

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irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 46:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 47:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&SI63134

REQUEST FOR ADMISSION NO. 48:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 48 is denied.

REQUEST FOR ADMISSION NO. 49:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 50:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

R&SI63135

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 51:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 52:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride containing products?

R&S163136

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 53:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 54:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride containing products?

R&S163137

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 55:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 56:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride containing products?

RASt63138

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 57:

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 57 is denied.

REQUEST FOR ADMISSION NO. 57: (sic)

Do you admit that any expert employed by your company, operating within the scope of that employment from the years 1948 through present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the

R&S163139

present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 80:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 81:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that

RSI63140

time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 82:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 83:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

R&S163141

irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 84:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 85:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

R&S163142

irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 86:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 87:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 87 is denied.

R&S163143

REQUEST FOR ADMISSION NO. 88:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 89:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&S163144

REQUEST FOR ADMISSION NO. 90:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 91:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&SI63145

REQUEST FOR ADMISSION NO. 92:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 93:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

P&SI63146

REQUEST FOR ADMISSION NO. 94:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 95:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&S163147

REQUEST FOR ADMISSION NO. 96:

Do you admit that any expert in industrial employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 96 is denied.

REQUEST FOR ADMISSION NO. 97:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 98:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever

R&SI63148

affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 99:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 100:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever

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affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 101:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 102:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever

R&S163150

affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 103:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 104:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever

R&M63151

affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 105:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 105 is denied.

REQUEST FOR ADMISSION NO. 106:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride?

RSI63152

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 107:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 108:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

R&SI63153

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 109:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 110:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride containing products?

RA5163154

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 111:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 112:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride containing products?

R&S163155

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 113:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 114:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride containing products?

PL&SI63156

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 114 is denied.

REQUEST FOR ADMISSION NO. 115:

Do you admit that any expert in occupational health employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 116:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the

F&S163157

present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 117:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 118:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that

R&SI63158

time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 119:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 120:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

R&SI63159

irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 121:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 122:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being

RS163160

irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 123:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 123 is denied.

REQUEST FOR ADMISSION NO. 124:

Do you admit that any expert in industrial hygiene employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

RA5163161

REQUEST FOR ADMISSION NO. 125:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 126:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that acute myelogenous leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&SI63162

REQUEST FOR ADMISSION NO. 127:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that leukemia may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 128:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that lymphoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&S163163

REQUEST FOR ADMISSION NO. 129:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the hemopoietic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 130:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that disorders of the lymphatic system may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

RS163164

REQUEST FOR ADMISSION NO. 131:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that brain cancer may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 132:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that angio sarcoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

R&S163165

REQUEST FOR ADMISSION NO. 133:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that astrocytoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Subject to its objections, Request for Admission No. 133 is denied.

REQUEST FOR ADMISSION NO. 134:

Do you admit that any expert in safety employed by your company operating within the scope of that employment from the year 1948 to present has ever affirmatively indicated that glioblastoma may be caused as a result of exposure to Vinyl Chloride containing products?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission for the time frame 1948 through 1969 and 1984 through the present on the grounds that Plaintiff was not an employee of this Defendant at that time. Defendant objects to this Request for Admission in its entirety as being irrelevant to the extent that the Request seeks an admission from this Defendant with regard to a condition from which this Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 135:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause acute myelogenous leukemia?

R&S163166

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 136:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 137:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause lymphoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 138:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause disorders of the hemopoietic system?

R&SI63167

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 139:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause disorders of the lymphatic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 140:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause brain cancer?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 141:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause angio sarcoma?

R&S163168

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant because it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 142:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause astrocytoma?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 143:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride may cause glioblastoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 144:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause acute myelogenous leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

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REQUEST FOR ADMISSION NO. 145:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 146:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause lymphoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 147:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause disorders of the hemopoietic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

R&SI63170

REQUEST FOR ADMISSION NO. 148:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause disorders of the lymphatic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 149:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause brain cancer?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 150:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause angio sarcoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

R&S163171

REQUEST FOR ADMISSION NO. 151:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause astrocytoma?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 152:

Do you admit that your company possesses documents which indicate or set forth the opinion that exposure to Vinyl Chloride containing products may cause glioblastoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 153:

Do you admit that your company has never conducted, caused to be conducted, or participated in any type of toxicological testing of Vinyl Chloride?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 154:

Do you admit that your company has never conducted, caused to be conducted, or participated in any type of toxicological testing of Vinyl Chloride containing products?

RESPONSE:

Denied.

R&S163172

REQUEST FOR ADMISSION NO. 155:

Do you admit that your company has never conducted, caused to be conducted, or participated in any type of epidemiological studies of employees who may have been exposed to Vinyl Chloride?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 156:

Do you admit that your company has never conducted, caused to be conducted, or participated in any type of epidemiological studies of employees who may have been exposed to Vinyl Chloride containing products?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 157:

Do you admit that your company has never conducted literature searches associated with the safety and health hazards of Vinyl Chloride?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 158:

Do you admit that production of Vinyl Chloride is an ultra hazardous activity?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 159:

Do you admit that handling Vinyl Chloride containing hydrocarbons is an ultra hazardous activity?

R&SI63173

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 160:

Do you admit that Vinyl Chloride is a hazardous substance?

RESPONSE:

Defendant objects to Request for Admission No. 160 on the grounds that it is vague and ambiguous. Subject to its objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 161:

Do you admit that your company has never conducted literature searches associated with the safety and health hazards of Vinyl Chloride containing products?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 162:

Do you admit that your company did have a substandard operating procedure relative to the safe use or handling of Vinyl Chloride during the time period:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965

RSI63174

s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 162 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 163:

Do you admit that your company did have a substandard operating procedure relative to the safe use or handling of Vinyl Chloride containing products during the time period:

a. 1948
b. 1949

RsSI63175

c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 163 as being irrelevant to the extent that it seeks this

R&SI63176

Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 164:

Do you admit that your company did have a substandard operating procedure relative to the safe use or handling of Vinyl Chloride containing process streams during the time period:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983

RA8163177

kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 164 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 165:

Do you admit that your company did not conduct and industrial hygiene exposure monitoring surveys relative to the assessment of employee exposure to Vinyl Chloride during the time period:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967

R&SI63178

u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 165 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 166:

Do you admit that your company did not conduct and industrial hygiene exposure monitoring surveys relative to the assessment of employee exposure to Vinyl Chloride containing products during the time period:

a. 1948
b. 1949
c. 1950
d. 1951

R&S163179

e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 166 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the

R&SI63180

present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 167:

Do you admit that your company did not conduct any industrial hygiene exposure monitoring surveys relative to the assessment of employee exposure to Vinyl Chloride containing process during the time period:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983
- kk. 1984
- ll. 1985

R&St63181

mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 167 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 168:

Do you admit that operators at defendant's Vinyl Chloride facility were included in a medical surveillance program for personnel exposed to Vinyl Chloride during the time period:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969

R&S163182

w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 168 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 169:

Do you admit that operators at defendants Vinyl Chloride facility were included in a medical surveillance program for personnel exposed to Vinyl Chloride containing products during the time period:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953

R&S163183

g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 169 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the

R&S163184

present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 170:

Do you admit that operators at defendants Vinyl Chloride facility were included in a medical surveillance program for personnel exposed to Vinyl Chloride containing process streams during the time period:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983
- kk. 1984
- ll. 1985

RA5163185

mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 170 as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1948 through 1968 and 1984 through the present because Plaintiff was not employed by this Defendant at that time. Subject to these objections, Defendant denies this Request for Admission.

REQUEST FOR ADMISSION NO. 171:

Do you admit that the following areas are or have been designated as "regulated areas" pursuant to 29 CFR 1910.1017(s)(e) at any period of time from 1963 through 1993:

- a) Areas within Vinyl Chloride facility.
- b) Your entire Vinyl Chloride facility.
- c) Facilities in the United States other than your Vinyl Chloride.

RESPONSE:

Defendant reiterates its general objections. Subject to those objections, Defendant admits Request for Admission No. 171(a). Defendant denies Request for Admission No. 171(b). Defendant objects to Request for Admission No. 171(c) as being ambiguous and irrelevant.

R&SI63186

REQUEST FOR ADMISSION NO. 172:

Do you admit that Defendant failed to comply with O.S.H.A. regulations pertaining to threshold limit values for Vinyl Chloride at your Vinyl Chloride facility for any period of time between 1970 and present?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1984 through the present because Plaintiff was not employed by this Defendant at that time. Defendant states that it has had an insufficient amount of time to review all of these documents and meet with all of its personnel to gather information sufficient enough to respond to Request for Admission No. 172. Based on the information that it has currently compiled, Defendant denies Request for Admission No. 172.

REQUEST FOR ADMISSION NO. 173:

Do you admit that Defendant failed to comply with O.S.H.A. regulations pertaining to threshold limit values for Vinyl Chloride containing products at your Vinyl Chloride facility for any period of time between 1970 and present?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1984 through the present because Plaintiff was not employed by this Defendant at that time. Defendant states that it has had an insufficient amount of time to review all of these documents and meet with all of its personnel to gather information sufficient enough to respond to Request for Admission

R&S163187

No. 173. Based on the information that it has currently compiled, Defendant denies Request for Admission No. 173.

REQUEST FOR ADMISSION NO. 174:

Do you admit that Defendant failed to comply with O.S.H.A. regulations pertaining to work place environmental an/or exposure monitoring for Vinyl Chloride at your Vinyl Chloride facility for any period of time between 1970 and present?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1984 through the present because Plaintiff was not employed by this Defendant at that time. Defendant states that it has had an insufficient amount of time to review all of these documents and meet with all of its personnel to gather information sufficient enough to respond to Request for Admission No. 174. Based on the information that it has currently compiled, Defendant denies Request for Admission No. 174.

REQUEST FOR ADMISSION NO. 175:

Do you admit that Defendant failed to comply with O.S.H.A. regulations pertaining to work place environmental an/or exposure monitoring for Vinyl Chloride containing products at your Vinyl Chloride facility for any period of time between 1970 and present?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1984 through the present because Plaintiff was not employed by this Defendant at that time. Defendant states that it has had an

R&S163188

insufficient amount of time to review all of these documents and meet with all of its personnel to gather information sufficient enough to respond to Request for Admission No. 175. Based on the information that it has currently compiled, Defendant denies Request for Admission No. 175.

REQUEST FOR ADMISSION NO. 176:

Do you admit that Defendant failed to comply with O.S.H.A. regulations pertaining to work place environmental an/or exposure monitoring for Vinyl Chloride containing process streams at your Vinyl Chloride facility for any period of time between 1970 and present?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts for the time frame 1984 through the present because Plaintiff was not employed by this Defendant at that time. Defendant states that it has had an insufficient amount of time to review all of these documents and meet with all of its personnel to gather information sufficient enough to respond to Request for Admission No. 176. Based on the information that it has currently compiled, Defendant denies Request for Admission No. 176.

REQUEST FOR ADMISSION NO. 177:

Do you admit that you are aware of employees or former employees of your company other than plaintiff, who have been diagnosed with:

- a. acute myelogenous leukemia
- b. leukemia
- c. lymphoma
- d. multiple myeloma
- e. disorder of the hemopoietic system
- f. disorder of the lymphatic system
- g. brain cancer
- h. astrocytoma

R&S163189

- i. glioblastoma
- j. angio sarcoma

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 177(a)-(g) and 177(i)-(j) as being irrelevant to the extent that they seek this Defendant to admit facts regarding conditions from which Plaintiff allegedly does not suffer. Subject to its objections, Defendant states that it has not had enough time to review all of its documentation and meet with all witnesses necessary to respond to Request for Admission No. 177(h). Subject to these objections, Defendant denies Request for Admission No. 177(h).

REQUEST FOR ADMISSION NO. 178:

Do you admit that you are aware of employees or former employees of your company who have been diagnosed with:

- a. acute myelogenous leukemia
- b. leukemia
- c. lymphoma
- d. multiple myeloma
- e. disorder of the hemopoietic system
- f. disorder of the lymphatic system
- g. brain cancer
- h. astrocytoma
- i. glioblastoma
- j. angio sarcoma

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 178(a)-(g) and 178(i)-(j) as being irrelevant to the extent that they seek this Defendant to admit facts regarding conditions from which Plaintiff allegedly does not suffer. Subject to its objections, Defendant states that it has not had enough time to review all of its documentation and meet with all witnesses necessary to respond to Request for Admission No. 178(h). Subject to these objections, Defendant denies Request for Admission No. 178(h).

R&S163190

REQUEST FOR ADMISSION NO. 179:

Do you admit that plaintiff was exposed to Vinyl Chloride in the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 179(a)-(c) and (s)-(bb) as being irrelevant for the reason the Plaintiff was not employed by this Defendant at that time. Furthermore, Defendant objects on the basis that this request is ambiguous in that the term "exposed" is not defined. Subject to these objections, Defendant denies Request for Admission No. 179(d)-(r).

RS163191

REQUEST FOR ADMISSION NO. 180:

Do you admit that plaintiff was exposed to Vinyl Chloride containing products in the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 180(a)-(c) and (s)-(bb) as being irrelevant for the reason the Plaintiff was not employed by this Defendant at that time. Furthermore, Defendant objects on the basis that this request is ambiguous in that the term "exposed" is not defined. Subject to these objections, Defendant denies Request for Admission No. 180(d)-(r).

R&SI63192

REQUEST FOR ADMISSION NO. 181:

Do you admit that plaintiff was exposed to Vinyl Chloride containing process streams in the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 181(a)-(c) and (s) as being irrelevant for the reason the Plaintiff was not employed by this Defendant at that time. Furthermore, Defendant objects on the basis that this request is ambiguous in that the term "exposed" is not defined. Subject to these objections, Defendant denies Request for Admission No. 181(d)-(r).

REQUEST FOR ADMISSION NO. 182:

Do you admit that plaintiff was an "authorized person" within the meaning of 29 CFR 1910.1017 et seq during the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969

R&S163193

e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further rejects to Request for Admission No. 182(a)-(c) and (s) as being irrelevant for the reason that Plaintiff was not employed by this Defendant during that time frame. Subject to its objections, Defendant admits Request for Admission No. 182(d)-(r).

REQUEST FOR ADMISSION NO. 183:

Do you admit that the plaintiff was exposed to Vinyl Chloride by direct contact with liquid Vinyl Chloride in the following years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984

R&S163194

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 183(a)-(c) and (s) as being irrelevant for the reason that Plaintiff was not employed by this Defendant during that time frame. Subject to its objections, Defendant denies Request for Admission No. 183(d)-(r).

REQUEST FOR ADMISSION NO. 184:

Do you admit that plaintiff was exposed to Vinyl Chloride containing products by direct contact with liquid Vinyl Chloride containing process streams in the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 184(a)-(c) and (s) as being irrelevant for the reason that Plaintiff was not employed by this Defendant during that time frame. Subject to its objections, Defendant denies Request for Admission No. 184(d)-(r).

R&SI63195

REQUEST FOR ADMISSION NO. 185:

Do you admit that the plaintiff was exposed to Vinyl Chloride containing process streams by direct contact with liquid Vinyl Chloride containing process streams in the following years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 185(a)-(c) and (s) as being irrelevant for the reason that Plaintiff was not employed by this Defendant during that time frame. Subject to its objections, Defendant denies Request for Admission No. 185(d)-(r).

REQUEST FOR ADMISSION NO. 186:

Do you admit that at any time between 1970 and present it was a practice of employees at your Vinyl Chloride facility not to report to OSHA all employee exposures to Vinyl Chloride which exceeded OSHA's threshold limit value?

RESPONSE:

Denied.

R&SI63196

REQUEST FOR ADMISSION NO. 187:

Do you admit that any time between 1970 and present your company did not report to OSHA all employee exposures to Vinyl Chloride which exceeded OSHA's threshold limit value which occurred at your Vinyl Chloride facility?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 188:

Do you admit that at any time between 1970 and present it was the practice of employees at your Vinyl Chloride facility not to report to OSHA all employee exposures to Vinyl Chloride containing products which exceeded OSHA's threshold limit value?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 189:

Do you admit that at any time between 1970 and present it was the practice of employees at your Vinyl Chloride facility not to report to OSHA all employee exposures to Vinyl Chloride containing process streams which exceeded OSHA's threshold limit value?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 190:

Do you admit that at any time between 1970 and present it was the policy of your company not to report to OSHA all employee exposures to Vinyl Chloride which exceeded OSHA's threshold limit value?

R&SI63197

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 191:

Do you admit that at any time between 1970 and present it was the policy of your company not to report to OSHA all employee exposures to Vinyl Chloride containing products which exceeded OSHA's threshold limit value?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 192:

Do you admit that at any time between 1970 and present it was the policy of your company not to report to OSHA all employee exposures to Vinyl Chloride containing process streams which exceeded OSHA's threshold limit value?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 193:

Do you admit that plaintiff suffers from astrocytoma?

RESPONSE:

Defendant has insufficient information to allow it to either admit or deny this Request for Admission, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 194:

Do you admit that you conducted an investigation into the circumstances of the plaintiff's possible Vinyl Chloride exposure after learning that he had developed astrocytoma?

F&SI63198

RESPONSE:

Defendant reiterates its general objections. Subject to its objections, Defendant further states that it has had an insufficient amount of time to review all of its documents and discuss this matter with all relevant personnel and therefore, despite reasonable inquiry, is unable at this time to either admit or deny this Request for Admission, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 195:

Do you admit that you first disseminated literature or other information to your employees relating the possible relationship between Vinyl Chloride exposure and astrocytoma after you became aware that the plaintiff had contracted that disease?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 196:

Do you admit that you first disseminated literature or other information to your employees relating the possible relationship between Vinyl Chloride containing products exposure and astrocytoma after you became aware that the plaintiff had contracted that disease?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 197:

Do you admit that you first disseminated literature or other information to your employees relating the possible relationship between Vinyl Chloride containing process streams exposure and astrocytoma after you became aware that the plaintiff had contracted that disease?

R&S163199

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 198:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of acute myelogenous leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 199:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 200:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of lymphoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

R&S163200

REQUEST FOR ADMISSION NO. 201:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of disorders of the hemopoietic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 202:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of disorders of the lymphatic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 203:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of brain cancer?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer. Defendant further objects to this Request for Admission as being improperly vague and ambiguous.

RA5163201

REQUEST FOR ADMISSION NO. 204:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of angio sarcoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 205:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of astrocytoma?

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 206:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride exposure and the development of glioblastoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 207:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of acute myelogenous leukemia?

RA5163202

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 208:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 209:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of lymphoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 210:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of disorders of the hemopoietic system?

PLS163203

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 211:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of disorders of the lymphatic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 212:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of brain cancer?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which allegedly does not suffer. Defendant further objects to this Request for Admission as being improperly vague and ambiguous.

R&SI63204

REQUEST FOR ADMISSION NO. 213:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of angio sarcoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 214:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of astrocytoma?

RESPONSE:

Defendant reiterates its general objections. Defendant would further state that it has had insufficient time to review all documents and talk to all people who may have personal knowledge regarding the subject matter of this Request for Admission. Defendant is unable to either admit or deny this Request for Admission, despite reasonable inquiry, and therefore, denies same.

REQUEST FOR ADMISSION NO. 215:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing products exposure and the development of glioblastoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 216:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of acute myelogenous leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 217:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 218:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of lymphoma?

RA5163206

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 219:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of disorders of the hemopoietic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 219: (sic)

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of disorders of the lymphatic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 220:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of brain cancer?

RA5163207

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer. Defendant further objects to this Request for Admission as being improperly vague and ambiguous.

REQUEST FOR ADMISSION NO. 221:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of angio sarcoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 222:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of astrocytoma?

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 223:

Do you admit that you never informed plaintiff that there was a possible causal relationship between Vinyl Chloride containing process streams exposure and the development of glioblastoma?

R&S163208

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant to the extent that it seeks this Defendant to admit facts regarding a condition from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 224:

Do you admit that the defendant failed to comply with OSHA regulations pertaining to threshold limit values or permissible exposure limits for Vinyl Chloride at your Vinyl Chloride facility for any period of time between 1963 and 1984?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 224 as being irrelevant for the years 1963 through 1968 and 1984 to the present for the reason the Plaintiff was not employed by this Defendant at that time. Defendant further objects to Request for Admission No. 224 as being improperly vague and ambiguous in failing to define pertinent terms, delineate areas of the facility requested, etc.

REQUEST FOR ADMISSION NO. 225:

Do you admit that your company had contracts with any agency of the United States of America for the manufacture or furnishing of any materials, supplied, articles or equipment in an amount exceeding \$10,000.00 during the years:

- a. 1959
- b. 1960
- c. 1961
- d. 1962
- e. 1963
- f. 1964
- g. 1965
- h. 1966
- i. 1967
- j. 1968
- k. 1969
- l. 1970

RA5163209

m. 1971
o. 1972
p. 1973
q. 1974
r. 1975
s. 1976
t. 1977
u. 1978
v. 1979
w. 1980
x. 1981
y. 1982
z. 1983
aa. 1984
bb. 1985
cc. 1986
dd. 1987
ee. 1988
ff. 1989
gg. 1990

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 225(a)-(j) and (aa)-(gg) as irrelevant inasmuch as it asks this Defendant to admit facts regarding a time frame during which Plaintiff was not employed by this Defendant. Subject to those objections, Defendant admits this Request for Admission No. 225(k)-(z).

REQUEST FOR ADMISSION NO. 226:

Do you admit that defendant failed to comply with the regulaion promulgated pursuant to the Wash Healey Act (Section 540-204.275) pertaining to the threshold limit values for Vinyl Chloride at your Vinyl Chloride facility for any period of time between 1960 and 1990?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 226 as irrelevant for that period of time during which

R&S163210

Plaintiff was not employed by this Defendant. Subject to these objections, Defendant denies Request for Admission No. 226.

REQUEST FOR ADMISSION NO. 227:

Do you admit that your company was subject to the provisions of the Wash Healey Public Contracts Act between 1960 and 1990?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 227 on the ground that it is irrelevant as to that period of time referenced during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits for Request for Admission No. 227.

REQUEST FOR ADMISSION NO. 228:

Do you admit that your company did not employ an industrial hygienist at its Vinyl Chloride facility before at least 1970?

RESPONSE:

Denied as written.

REQUEST FOR ADMISSION NO. 229:

Do you admit that you have no evidence that your company performed industrial hygiene monitoring (this is not to be interpreted as including testing for explosion hazards) relative to your employees possible Vinyl Chloride exposure at your Vinyl Chloride facility in:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957

R&SI63211

k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967
u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 229(a)-(u) and (kk)-(tt) as being irrelevant inasmuch as it seeks this Defendant to admit facts regarding a time frame during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that it has evidence regarding industrial hygiene monitoring during certain of the years which are relevant to this action.

R&S163212

REQUEST FOR ADMISSION NO. 230:

Do you admit that you have no evidence that your company performed industrial hygiene monitoring (this is not to be interpreted as including testing for explosion hazards) relative to your employees possible Vinyl Chloride containing products exposure at your Vinyl Chloride facility in:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971
- y. 1972
- z. 1973
- aa. 1974
- bb. 1975
- cc. 1976
- dd. 1977
- ee. 1978
- ff. 1979
- gg. 1980
- hh. 1981
- ii. 1982
- jj. 1983
- kk. 1984
- ll. 1985
- mm. 1986
- nn. 1987

R&S163213

oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 230(a)-(u) and (kk)-(tt) as being irrelevant inasmuch as it seeks this Defendant to admit facts regarding a time frame during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that it has evidence regarding industrial hygiene monitoring during certain of the years which are relevant to this action.

REQUEST FOR ADMISSION NO. 231:

Do you admit that you have no evidence that your company performed industrial hygiene monitoring (this is not to be interpreted as including testing for explosion hazards) relative to your employees possible Vinyl Chloride containing process streams at your Vinyl Chloride facility in:

a. 1948
b. 1949
c. 1950
d. 1951
e. 1952
f. 1953
g. 1954
h. 1955
i. 1956
j. 1957
k. 1958
l. 1959
m. 1960
n. 1961
o. 1962
p. 1963
q. 1964
r. 1965
s. 1966
t. 1967

R&SI63214

u. 1968
v. 1969
w. 1970
x. 1971
y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 231(a)-(u) and (kk)-(tt) as being irrelevant inasmuch as it seeks this Defendant to admit facts regarding a time frame during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that it has evidence regarding industrial hygiene monitoring during certain of the years which are relevant to this action.

REQUEST FOR ADMISSION NO. 232:

Do you admit that you currently posses (sic) no information which indicates or sets forth the opinion that there is not an association between exposure to Vinyl Chloride and the development of:

- a. acute myelogenous leukemia
- b. leukemia
- c. lymphoma

R&S163215

- d. multiple myeloma
- e. disorder of the hemopoietic system
- f. disorder of the lymphatic system
- g. brain cancer
- h. astrocytoma
- i. glioblastoma
- j. angio sarcoma

RESPONSE:

Defendant objects to Request for Admission No. 232 on the grounds that it is irrelevant to the extent that it asks this Defendant to admit facts regarding conditions or illnesses from which this Plaintiff does not suffer. Subject to its objections, Defendant denies Request for Admission No. 232.

REQUEST FOR ADMISSION NO. 233

Do you admit that your company did not have a standard operating procedure relative to the safe use or handling of Vinyl Chloride:

- a. Before 1945
- b. Before 1950
- c. Before 1955
- d. Before 1960
- e. Before 1965
- f. Before 1970
- g. Before 1975
- h. Before 1980
- i. Before 1985
- j. Before 1990

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 233 as being overly broad, vague, subject to different interpretation, duplicitous and irrelevant as to certain time frames during which Plaintiff was not an employee of Defendant. Subject to its objections, Defendant denies Request for Admission No. 233.

F&SI63216

REQUEST FOR ADMISSION NO. 234:

Do you admit that your company did not have a standard operating procedure relative to the safe use or handling of Vinyl Chloride containing products:

- a. Before 1945
- b. Before 1950
- c. Before 1955
- d. Before 1960
- e. Before 1965
- f. Before 1970
- g. Before 1975
- h. Before 1980
- i. Before 1985
- j. Before 1990

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 234 as being overly broad, vague, subject to different interpretation, duplicitous and irrelevant as to certain time frames during which Plaintiff was not an employee of Defendant. Subject to its objections, Defendant denies Request for Admission No. 234.

REQUEST FOR ADMISSION NO. 235:

Do you admit that your company did not have a standard operating procedure relative to the safe use or handling of Vinyl Chloride containing process streams:

- a. Before 1945
- b. Before 1950
- c. Before 1955
- d. Before 1960
- e. Before 1965
- f. Before 1970
- g. Before 1975
- h. Before 1980
- i. Before 1985
- j. Before 1990

R&SI63217

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 235 as being overly broad, vague, subject to different interpretation, duplicitous and irrelevant as to certain time frames during which Plaintiff was not an employee of Defendant. Subject to its objections, Defendant denies Request for Admission No. 235.

REQUEST FOR ADMISSION NO. 236:

Do you admit that you cannot name a single witness who will testify that a rule requiring your employees to wear respirators in all operations where there was dust, smoke or fumes present in very light concentrations was ever enforced at your Vinyl Chloride facility in:

- a. 1940's
- b. 1950's
- c. 1960's
- d. 1970's
- e. 1980's
- f. 1990's

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 236(a)-(c) and (e)-(f) as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant would state it has had an insufficient amount of time to review its documents and meet with those individuals with personal knowledge and therefore, despite reasonable inquiry, Defendant is unable to either admit or deny the relevant portion of this Request, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 237:

Do you admit that you cannot name a single witness who will testify that a rule requiring your employees to wear gas masks (canister type) in all cases where toxic

RAST63218

gases or chemicals might be present in open areas and low concentrations was ever enforced at your Vinyl Chloride facility in the:

- a. 1940's
- b. 1950's
- c. 1960's
- d. 1970's
- e. 1980's
- f. 1990's

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 237(a)-(c) and (e)-(f) as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant would state it has had an insufficient amount of time to review its documents and meet with those individuals with personal knowledge and therefore, despite reasonable inquiry, Defendant is unable to either admit or deny the relevant portion of this Request, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 238:

Do you admit that you cannot name a single witness who will testify that a rule requiring the use of gas masks (hose or fresh air type) in all cases where toxic gases or chemicals were present in hazardous concentrations and in all closed places, such as towers, vessels, storage tanks, tank cars, man holes, etc., where there might be heavy smoke or a deficiency of oxygen was ever enforced at your Vinyl Chloride facility in the:

- a. 1940's
- b. 1950's
- c. 1960's
- d. 1970's
- e. 1980's
- f. 1990's

R&S163219

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 238(a)-(c) and (e)-(f) as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant would state it has had an insufficient amount of time to review its documents and meet with those individuals with personal knowledge and therefore, despite reasonable inquiry, Defendant is unable to either admit or deny the relevant portion of this Request, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 239:

Do you admit that you are aware of epidemiological studies indicating excess exposures to Vinyl Chloride at Rail loading facilities?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 239 on the grounds that it is vague, ambiguous and nonsensical.

REQUEST FOR ADMISSION NO. 240:

Do you admit that the plaintiff was exposed to Vinyl Chloride in excess of OSHA'S threshold limit value while working at the Conoco/Vista PVC Plant in Aberdeen, Mississippi during the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977

R&SI63220

m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 240 as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Subject to these objections, Defendant denies Request for Admission No. 240.

REQUEST FOR ADMISSION NO. 241:

Do you admit that the plaintiff was exposed to Vinyl Chloride containing products in excess of OSHA's threshold limit value while working at the Conoco/Vista PVC Plant in Aberdeen, Mississippi during the years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 241 as being irrelevant for those periods of time during

R&S163321

which Plaintiff was not employed by this Defendant. Subject to these objections, Defendant denies Request for Admission No. 241.

REQUEST FOR ADMISSION NO. 242:

Do you admit that the plaintiff was exposed to Vinyl Chloride containing process streams in excess of OSHA'S threshold limit value while working at your Vinyl Chloride facility during the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 242 as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Subject to these objections, Defendant denies Request for Admission No. 242.

REQUEST FOR ADMISSION NO. 243:

Do you admit that you did not provide the plaintiff with adequate medical surveillance as required by 29 CFR 1910.1017 et seq during the years:

- a. 1966
- b. 1967

- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 243(a)-(c) and (s) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant denies that it failed to comply with 29 C.F.R. 1910.1017, *et seq.*

REQUEST FOR ADMISSION NO. 244:

Do you admit that you did not provide the plaintiff with medical monitoring required by 29 CFR 1910.1017 *et seq* during the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980

R&S163223

p. 1981
q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 244(a)-(c) and (s) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant denies that it failed to comply with 29 C.F.R. 1910.1017, *et seq.*

REQUEST FOR ADMISSION NO. 245:

Do you admit that your company never provided the plaintiff with personal monitoring devices evidencing his level of exposure to Vinyl Chloride while working at your Conoco/Vista PVC Plant in Aberdeen, Mississippi during the years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982

R&SI63224

- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 245 as being irrelevant for those periods of time during which Plaintiff was not employed by this Defendant. Defendant further states that it has had insufficient time to review all of its relevant documents and meet with individuals with personal knowledge and, therefore, despite reasonable inquiry to date, is unable to either admit or deny the relevant portions of Request for Admission No. 245.

REQUEST FOR ADMISSION NO. 246:

Do you admit that your company never warned the public at large of the hazards associated with exposure to Vinyl Chloride containing products manufactured, sold, and/or distributed by your company during the years:

- a. 1948
- b. 1949
- c. 1950
- d. 1951
- e. 1952
- f. 1953
- g. 1954
- h. 1955
- i. 1956
- j. 1957
- k. 1958
- l. 1959
- m. 1960
- n. 1961
- o. 1962
- p. 1963
- q. 1964
- r. 1965
- s. 1966
- t. 1967
- u. 1968
- v. 1969
- w. 1970
- x. 1971

R&S163225

y. 1972
z. 1973
aa. 1974
bb. 1975
cc. 1976
dd. 1977
ee. 1978
ff. 1979
gg. 1980
hh. 1981
ii. 1982
jj. 1983
kk. 1984
ll. 1985
mm. 1986
nn. 1987
oo. 1988
pp. 1989
qq. 1990
rr. 1991
ss. 1992
tt. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 246(a)-(u) and (kk)-(tt) as being irrelevant in that it seeks this Defendant to admit facts for a time frame during which Plaintiff was not employed by Defendant. Defendant further objects to the remainder of Request for Admission No. 246 as being irrelevant to the allegations as pled by Plaintiff.

REQUEST FOR ADMISSION NO. 247:

Do you admit that Vinyl Chloride is unreasonably dangerous per se?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 248:

Do you admit that Vinyl Chloride containing products are dangerous per se?

RESPONSE:

Denied.

R&S163226

REQUEST FOR ADMISSION NO. 249:

Do you admit that Vinyl Chloride containing process streams are dangerous per se?

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 250:

Do you admit that you did not anticipate this litigation until you were served with a copy of the Plaintiff's Original Petition to perpetuate testimony which was filed on or about July 5, 1992?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 250 on the grounds that it is irrelevant to the claims currently pled by Plaintiff.

REQUEST FOR ADMISSION NO. 251:

Do you admit that your company did not disseminate information concerning the health hazards associated with exposure to Vinyl Chloride to its employees in:

- a. 1947
- b. 1948
- c. 1949
- d. 1950
- e. 1951
- f. 1952
- g. 1953
- h. 1954
- i. 1955
- j. 1956
- k. 1957
- l. 1958
- m. 1959
- n. 1960
- o. 1961
- p. 1962
- q. 1963
- r. 1964

R&SI63227

s. 1965
t. 1966
u. 1967
v. 1968
w. 1969
x. 1970
y. 1971
z. 1972
aa. 1973
bb. 1974
cc. 1975
dd. 1976
ee. 1977
ff. 1978
gg. 1979
hh. 1980
ii. 1981
jj. 1982
kk. 1983
ll. 1984
mm. 1985
nn. 1986
oo. 1987
pp. 1988
qq. 1989
rr. 1990
ss. 1991
tt. 1992
uu. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 251(a)-(v) and (ll)-(uu) as being irrelevant in that it seeks this Defendant to admit facts for a time frame during which the Plaintiff was not employed by Defendant. Defendant further objects to Request for Admission No. 251 as being overly broad, vague and ambiguous. Subject to its objections, Defendant denies Request for Admission No. 251.

REQUEST FOR ADMISSION NO. 252:

Do you admit that the defendant exposed the plaintiff to Vinyl Chloride without his consent during the years:

a. 1966

- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 253:

Do you admit that the defendant exposed the plaintiff to Vinyl Chloride containing products without his consent during the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RA5163229

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 254:

Do you admit that the defendant exposed the plaintiff to Vinyl Chloride containing process streams without his consent during the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 255:

Do you admit that the sewage ditch located at your Vinyl Chloride facility was contaminated with Vinyl Chloride for the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975

R&SI63230

k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant objects to this Request for Admission as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Defendant objects to this Request for Admission as being improperly vague and ambiguous. Defendant further states that it has had insufficient time to review all documents or speak with all persons who may have personal knowledge of the facts sought in this Request for Admission and, despite reasonable inquiry, is unable to either admit or deny this Request for Admission and, therefore, denies same.

REQUEST FOR ADMISSION NO. 256:

Do you admit that the sewage ditch located at your Vinyl Chloride facility was contaminated with Vinyl Chloride containing products for the years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973

R&SI63231

- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant objects to this Request for Admission as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Defendant objects to this Request for Admission as being improperly vague and ambiguous. Defendant further states that it has had insufficient time to review all documents or speak with all persons who may have personal knowledge of the facts sought in this Request for Admission and, despite reasonable inquiry, is unable to either admit or deny this Request for Admission and, therefore, denies same.

REQUEST FOR ADMISSION NO. 257:

Do you admit that the sewage ditch located at your Vinyl Chloride facility was contaminated with Vinyl Chloride containing process streams for the years:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971

R&S163232

g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant objects to this Request for Admission as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Defendant objects to this Request for Admission as being improperly vague and ambiguous. Defendant further states that it has had insufficient time to review all documents or speak with all persons who may have personal knowledge of the facts sought in this Request for Admission and, despite reasonable inquiry, is unable to either admit or deny this Request for Admission and, therefore, denies same.

REQUEST FOR ADMISSION NO. 258:

Do you admit that you released Vinyl Chloride containing products (including, but not limited to resins) into the ambient air during the years:

a. 1966
b. 1967
c. 1968
d. 1969

RAST 63233

e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 259:

Do you admit that you released Vinyl Chloride into the ambient air during the
years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981

R&S163234

q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 260:

Do you admit that you supplied any Vinyl Chloride to the Conoco/Vista PVC
Plant in Aberdeen, Mississippi during the years:

a. 1966
b. 1967
c. 1968
d. 1969
e. 1970
f. 1971
g. 1972
h. 1973
i. 1974
j. 1975
k. 1976
l. 1977
m. 1978
n. 1979
o. 1980
p. 1981
q. 1982
r. 1983
s. 1984
t. 1985
u. 1986
v. 1987
w. 1988
x. 1989
y. 1990
z. 1991
aa. 1992
bb. 1993

F&SI 63235

RESPONSE:

Defendant reiterates its general objections. Defendant objects to Request for Admission No. 260 for those years during which Plaintiff was not employed by this Defendant. Subject to its objections, Request for Admission No. 260 is admitted.

REQUEST FOR ADMISSION NO. 261:

Do you admit that plaintiff, while employed by defendant at its Vinyl Chloride facility, was included in a medical surveillance program for personnel exposed to Vinyl Chloride for the period of time:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 261 as being irrelevant for those years during which

F&SI 63236

Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that Plaintiff's health and medical condition were monitored.

REQUEST FOR ADMISSION NO. 262:

Do you admit that plaintiff, while employed by defendant at its Vinyl Chloride facility, was included in a medical surveillance program for personnel exposed to Vinyl Chloride containing products for the period of time:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 262 as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that Plaintiff's health and medical condition were monitored.

R&S163237

REQUEST FOR ADMISSION NO. 263:

Do you admit that plaintiff, while employed by defendant at its Vinyl Chloride facility, was included in a medical surveillance program for personnel exposed to Vinyl Chloride containing process streams for the period of time:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984
- t. 1985
- u. 1986
- v. 1987
- w. 1988
- x. 1989
- y. 1990
- z. 1991
- aa. 1992
- bb. 1993

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 263 as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that Plaintiff's health and medical condition were monitored.

R&S163238

REQUEST FOR ADMISSION NO. 264:

Do you admit that plaintiff, while employed at your Vinyl Chloride facility, was included in a medical surveillance program for personnel exposed to any chemical substance other than Vinyl Chloride for any period of time from 1963 through 1993?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 264 as being irrelevant for those years during which Plaintiff was not employed by this Defendant. Subject to its objections, Defendant admits that Plaintiff's health and medical condition were monitored.

REQUEST FOR ADMISSION NO. 265:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with acute myelogenous leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 266:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with leukemia?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

F&SI 63239

REQUEST FOR ADMISSION NO. 267:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with lymphoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 268:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with multiple myeloma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 269:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with disorders of the hemopoietic system?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 270:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with disorders of the lymphatic system?

RSI63240

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff does allegedly not suffer.

REQUEST FOR ADMISSION NO. 271:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with brain cancer?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer. Defendant further objects to this Request for Admission as being improperly vague and ambiguous.

REQUEST FOR ADMISSION NO. 272:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with angio sarcoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 273:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with astrocytoma?

RAST63241

RESPONSE:

Defendant reiterates its general objections. Furthermore, Defendant has had insufficient time to review its records and meet with individuals who have personal knowledge and, despite the reasonable inquiry made so far, Defendant is unable to either admit or deny this Request for Admission, and, therefore, denies same.

REQUEST FOR ADMISSION NO. 274:

Do you admit that plaintiff was not the first employee or former employee at your Vinyl Chloride facility to be diagnosed with glioblastoma?

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to this Request for Admission as being irrelevant in that it seeks Defendant to admit facts regarding a disease or illness from which Plaintiff allegedly does not suffer.

REQUEST FOR ADMISSION NO. 275:

Do you admit that plaintiff was employed by you and was assigned to your Vinyl Chloride facility at any time between 1963 and 1984?

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 276:

Do you admit that plaintiff was exposed to Vinyl Chloride in excess of OSHA threshold limit value while employed at the defendant's Vinyl Chloride facility at any time between?

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973

RA5163242

- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 276(a-c) and (s) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was was not employed by this Defendant. Defendant further states that it has had insufficient time to review its documents and meet with individuals who have personal knowledge sufficient to allow Defendant to respond to this Request for Admission. Therefore, despite such reasonable inquiry to date, Defendant is unable to either admit or deny Request for Admission No. 276(d-r), and, therefore, denies same.

REQUEST FOR ADMISSION NO. 277:

Do you admit that plaintiff was exposed to Vinyl Chloride containing products in excess of OSHA threshold limit value while employed at the defendants Vinyl Chloride facility at any time between:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978

R&S163243

- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983
- s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 277(a-c) and (s) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was not employed by this Defendant. Defendant further states that it has had insufficient time to review its documents and meet with individuals who have personal knowledge sufficient to allow Defendant to respond to this Request for Admission. Therefore, despite such reasonable inquiry to date, Defendant is unable to either admit or deny Request for Admission No. 277(d-r), and, therefore, denies same.

REQUEST FOR ADMISSION NO. 278:

Do you admit that plaintiff was exposed to Vinyl Chloride containing process streams in excess of OSHA threshold limit value while employed at the defendant's Vinyl Chloride facility at any time between:

- a. 1966
- b. 1967
- c. 1968
- d. 1969
- e. 1970
- f. 1971
- g. 1972
- h. 1973
- i. 1974
- j. 1975
- k. 1976
- l. 1977
- m. 1978
- n. 1979
- o. 1980
- p. 1981
- q. 1982
- r. 1983

R&SI63244

s. 1984

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 278(a-c) and (s) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was not employed by this Defendant. Defendant further states that it has had insufficient time to review its documents and meet with individuals who have personal knowledge sufficient to allow Defendant to respond to this Request for Admission. Therefore, despite such reasonable inquiry to date, Defendant is unable to either admit or deny Request for Admission No. 278(d-r), and, therefore, denies same.

REQUEST FOR ADMISSION NO. 279:

Do you admit that the plaintiff was exposed to Vinyl Chloride in excess of OSHA's threshold limit values while employed at your Vinyl Chloride facility in:

- a. 1980
- b. 1981
- c. 1982
- d. 1983
- e. 1984
- f. 1985
- g. 1986
- h. 1987
- i. 1988
- j. 1989
- k. 1990

RESPONSE:

Defendant reiterates its general objections. Defendant further objects to Request for Admission No. 279(e-k) as being irrelevant inasmuch as it seeks this Defendant to admit to facts for a time frame during which Plaintiff was not employed by the Defendant. Defendant further states that it has had insufficient time to review its documents and meet with individuals who have personal knowledge sufficient to allow Defendant to respond to this Request for Admission. Therefore, despite such

R&S163245

reasonable inquiry to date, Defendant is unable to either admit or deny Request for Admission No. 279(a-d), and, therefore, denies same.

REQUEST FOR ADMISSION NO. 280:

Do you admit that your company is successor in interest to Conoco Oil Company, Conoco Chemical and Monroe Manufacturing PVC plant located in Aberdeen, Monroe County, Mississippi?

RESPONSE:

Denied.

Respectfully submitted,

Deborah D. Kuchler
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DEBORAH D. KUCHLER (17013)
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New Orleans, Louisiana 70130
Telephone: 504/568-9393
Attorneys for Defendants,
Conoco Inc. and
E. Marcus Smith

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that I have on this 8th day of October, 1993, served the foregoing pleading on all counsel of record by placing a copy of same in the United States Mail, properly addressed and first class postage prepaid, or by hand delivery.

Deborah D. Kuchler

/pl

R&S163246