FILE NAME: AT&T and other Phone Companies (ATT)

DATE: 0000

DOC#: ATT009

DOCUMENT DESCRIPTION: Legal – Western Electric admission in plaintiff's opposition to defendant's motion for Summary Judgement

B. Western Electric's Use of Asbestos

Western Electric admits that it acquired and used phenolic molding compounds that contained asbestos. (Western Electric Asbestos Products Memo, dated August 1, 2000, at 2-3, Abell Decl. at Ex. D; Alcatel-Lucent USA Inc., formerly known as Lucent Technologies Inc., individually and as successor-in-interest to Western Electric Company Inc.'s Responses to Plaintiff's Standard Set Of Liability Interrogatories and Requests for Production of Documents, Supreme Court of New York, Index No. 4000, dated April 22, 2011 ("Alcatel Response to Standard Discovery"), at 113, Abell Decl. at Ex. E.) Western Electric purchased phenolic molding compound under the trade name of Durez from GE. (Western Electric Asbestos Products Memo, dated August 1, 2000, at 3, Abell Decl. at Ex. D.) In addition, Western Electric purchased Bakelite, Fiberite, and Rogers brand phenolic molding compounds. These compounds contained up to 30% asbestos. (Alcatel Responses to Standard Discovery, at 113, Abell Decl. at Ex. E.)

Western Electric admits that they used soldering wiping pads that were 90% asbestos. (Alcatel Responses to Standard Discovery, at 124, Abell Decl. at Ex. E.) These pads were sometimes made of a woven material. (*Id.* at 125.)

Western Electric admits that they used hook-up wires that may have contained asbestos. (Alcatel Responses to Standard Discovery, at 87, Abell Decl. at Ex. E.) American Insulated Wire provided Western Electric with asbestos-containing wire. (Western Electric Asbestos Products Memo, dated August 1, 2000, at 6, Abell Decl. at Ex. D; Alcatel Responses to Standard Discovery, at 87, Abell Decl. at Ex. E.) Hook-up wire model KS13544 was not discontinued from use until 1973. (Alcatel Responses to Standard Discovery, at 89, Abell Decl. at Ex. E.)

C. Western Electric's Knowledge of Asbestos.

Information regarding the dangers of asbestos exposure was published and available to Western Electric long before Mrs. Amundsen was exposed to asbestos through her work with Defendant's asbestos-containing products. For example, as early as 1935, researchers suggested a connection between the diseases asbestosis and pulmonary carcinoma. (*See* Selikoff et al., *Asbestos Exposure and Neoplasia*, Abell Decl. at Ex. F at 142.) In 1955, a study was published by Doll in which the numerous observed incidences of cancers of the lung and pleura in a cohort of