

FILE NAME: Pecora Chemical (PEC)

DATE: 2017

DOC#: PEC008

DOCUMENT DESCRIPTION: Legal - Defendant's Answers to Interrogatories

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

BRIAN L. BELL, <i>et al.</i>	Civil Action No. 2016 CA 003998 A
Plaintiff	Judge A. Josey-Herring
v.	Next Calendar Event: 1/27/17
AC&R INSULATION CO., <i>et al</i>	ID EXPECTED EXPERTS CALLED FOR TRIAL
Defendants	<i>Our File No: 1091-101701</i>

**DEFENDANT PECORA CORPORATION'S ANSWERS TO PLAINTIFF'S
MASTER SET OF INTERROGATORIES TO DEFENDANTS**

NOW COMES the Defendant, Pecora Corporation, by and through its attorneys, and for its responses to Plaintiffs' Interrogatories states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Defendant, Pecora Corporation ("Pecora"), incorporates this Preliminary Statement into each response to plaintiff's interrogatories and requests for production. Pecora Corporation objects to the scope and volume of these discovery requests in their entirety as they are unnecessarily repetitive and designed to harass defendant. Pecora Corporation asserts the following objections with regard to each and every interrogatory and document request herein, whether or not such objection is specifically stated.

Some of the events which may be relevant to the matters inquired into by these Interrogatories occurred more than forty (40) years ago. Many of the individuals who might have had personal knowledge of the matters to which Plaintiffs' Interrogatories relate are deceased or

(E) The custodian of all documents in your custody, possession or control which relate to or describe any such warranties, guarantees or other representations or the decision to place any of these on or with the product and/or on or in the container or package.

ANSWER: See Answer to Interrogatory No. 64.

INTERROGATORY NO. 66: State whether the content and/or placement of any warranty, guarantee or other representation described in your Answer to Interrogatory Nos. 64 and 65 was ever changed. If so, for each such change, identify:

- (A) The nature of the change, including a verbatim description, if applicable;
- (B) The date when the change was made and the inclusive dates during which such change appeared on or with the product and/or on or in the container or package;
- (C) The persons with personal knowledge of the reasons for making the change; and
- (D) The custodian of documents in your custody, possession or control which relate to the decision and process of making the change.

ANSWER: See Answer to Interrogatory No. 64.

INTERROGATORY NO. 67: State when and by what means you became aware of the alleged hazards of exposure to asbestos dusts, fibers and/or products to the health of persons coming into contact with, handling or using asbestos products.

ANSWER: Pecora corporation objects to this interrogatory as it call for the production of attorney-client information. Without waving the forgoing, Pecora Corporation learned of the alleged hazard of asbestosis in late 1985 or early 1986 and promptly removed asbestos from its furnace cement.

VERIFICATION

I, Robert Heim, state that I am an authorized representative of Defendant Pecora Corporation and verify that the above Responses to Plaintiff's discovery requests in the Bell matter are true and correct to the best of my knowledge, information and belief. The statements contained herein are made subject to the penalties of perjury.

A handwritten signature in dark ink, appearing to read 'Robert Heim', is written over a horizontal line.

Robert Heim

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 17, 2017, a copy of the foregoing Defendant Pecora Corporation's Answers to Plaintiff's Master Set of Interrogatories to Defendants was served via CaseFileXpress to all counsel of record.

/s/ Sebastian A. Goldstein
Sebastian A. Goldstein