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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

MOTLEY, LEAHY, HENNINGSON

NOV 11 1988

MASTER FILE
ASBESTOS INJURY CASES
CALENDAR II

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RESPONSE OF PITTSBURGH CORNING
CORPORATION TO PLAINTIFF'S
MASTER SET OF INTERROGATORIES

PLAINTIFF'S
EXHIBIT

08237.00

PLAINTIFF'S
EXHIBIT

WV-025025

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IN RE: NEBRASKA ASBESTOS CASES :
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RESPONSE OF PITTSBURGH CORNING CORPORATION TO
PLAINTIFF'S MASTER SET OF INTERROGATORIES

GENERAL OBJECTION

This Defendant manufactured an asbestos thermal insulation product, UNIBESTOS, from July 1, 1962 to February 1, 1972. Unless otherwise stated in answer to specific interrogatories, the responses herein shall be limited to such product and time period. This Defendant objects to providing answers for any other period of time on the grounds that such additional information sought is irrelevant, immaterial, not calculated to lead to the discovery of admissible evidence and, furthermore, could be burdensome, expensive and harassing to comply with.

The mineral asbestos may be found in a wide variety of product forms, including ceiling tiles, floor tiles, gaskets, gloves, mastics, protective aprons, protective matting, etc. This Defendant objects generally to these interrogatories as vague, overly broad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence so far as they relate or refer to unidentified

asbestos-containing products or materials and will limit its answers as stated above.

This Defendant states that there never existed a predecessor corporation with respect to Defendant; further, Defendant states that its answers to any interrogatory herein relate only to this Defendant and are not to be construed to imply the existence of a predecessor corporation.

1 State the name, address, telephone number and position of the corporate officer answering these interrogatories.

RESPONSE: Robert E. Buckley (Retired) Consultant
Former Vice President and Assistant to the President
800 Presque Isle Drive
Pittsburgh, Pennsylvania 15239
(412) 327-6100

2. Identify the registered name of the answering Defendant as well as all prior names or predecessor entities by which the Defendant has existed.

(a) For each give the current address and the state of incorporation and whether or not it is an active corporation.

RESPONSE: Pittsburgh Corning Corporation.
800 Presque Isle Drive
Pittsburgh, Pennsylvania 15239

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Pennsylvania; 1937

This Defendant is an active corporation.

3. Set forth the full and correct name, the principle place of business and the country or countries and/or state(s) and date of incorporation of the answering Defendant.

RESPONSE: See response to Interrogatory No. 2.

4. Identify all divisions, subsidiaries or affiliated companies to the answering Defendant.

RESPONSE: Not applicable.

5. With respect to each division, subsidiary or company listed in the previous interrogatory, identify the nature and extent of its function during the period of time it was in existence.

ANSWER: Not applicable.

6. As to any product containing asbestos in any form or quantity has this Defendant or any of its divisions, subsidiaries or affiliates ever:

(a) Designed such a product;

RESPONSE: No.

(b) Manufactured such a product;

RESPONSE: Yes.

(c) Processed and/or refined such a product;

RESPONSE: No.

(d) Sold such a product;

RESPONSE: Yes.

(e) Distributed such a product;

RESPONSE: No.

(f) Relabeled such a product manufactured or
designed by another;

RESPONSE: No.

(g) Held a patent for such a product.

ANSWER: No.

7. If the answer to the previous interrogatory or any subpart thereof was in the affirmative, please state the following information about each product, whether designed, manufactured, processed, refined, sold, and/or distributed by you.

(a) The manufacturer of the product;

RESPONSE: Pittsburgh Corning Corporation.

(b) The designer of the product;

RESPONSE: Unknown. This Defendant manufactured and sold Unibestos for the first time on July 1, 1962 the day following its purchase of selected assets and facilities from Union Asbestos and Rubber Company (UNARCO) which it then utilized in the manufacture of Unibestos. This Defendant does not have specific knowledge as to when Unibestos was first commercially sold, however, this Defendant believes the product was first sold by UNARCO as early as 1954. Further, this Defendant has no knowledge with respect to UNARCO's actions concerning the designing, developing, testing and packaging of the product during and after the product's introduction into the market. Production ceased February 1, 1972.

(c) The supplier of raw asbestos fiber used in the product;

RESPONSE: This Defendant purchased amosite asbestos fibers from the following suppliers:

- (1) Union Asbestos and Rubber Co. (UNARCO)
332 South Michigan Avenue
Chicago, Illinois 60604

- (2) EGNEP (Pty.) Limited (EGNEP)
(owned by Cape Asbestos Company, Limited)
Burlington House
22 Rissik Street
Johannesburg, South Africa
- (3) North American Asbestos Corporation
(North American)
200 South Michigan Avenue
Chicago, Illinois 60604
- (4) General Services Administration (GSA)
United States of America
Stockpile Disposal Division
Property Management and Disposal Services
Washington, D.C. 20405

Cape Asbestos Company, Limited, with offices in London, England, together with its subsidiary, North American Asbestos Corporation, acted as liaison between Pittsburgh Corning and EGNEP, but were not involved in the actual buy-sell transaction between parties.

With regard to asbestos sold by North American to Pittsburgh Corning Corporation, all of it was purchased by North American from GSA.

North American purchased such asbestos and, in turn, billed Pittsburgh Corning upon shipment.

(d) The dates of manufacture or sale by the answering Defendant;

RESPONSE: See (b), above.

(e) The percentage asbestos content of the product;

RESPONSE: Because authentic, reliable production records of the precise percentages of components in Unibestos cannot be found in this Defendant's files, and because the quantity of each component varied from one wall thickness and inner diameter to another, the information requested in this interrogatory concerning quantities of components can only be based on the following approximations:

Average Percentage per Unit Volume

Amosite fiber	6%
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Sodium Silicate and Diatomaceous Earth	17%
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Average Percentage by Weight

Amosite fiber	65%
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Sodium Silicate and Diatomaceous Earth	35%
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(f) The type or types of asbestos used in the manufacture of the product at all times such product was manufactured;

RESPONSE: See (e), above.

(g) The use of such product;

RESPONSE: Pipe insulation.

(h) The brand name and company name under which such product was distributed;

RESPONSE: Unibestos; Pittsburgh Corning Corporation.

(i) Whether each such product could be used interchangeably with products of other manufacturers, distributors, or sellers. Identify each such product and manufacturer.

RESPONSE: This Defendant objects to this interrogatory on the basis that it is overly broad, vague and ambiguous and is not calculated to lead to the discovery of admissible evidence.

8. In what year did the answering Defendant first begin selling or distributing asbestos-containing products? Please be specific for each asbestos-containing product manufactured, sold or distributed by you.

RESPONSE: Objection. Repetitive.

9. State the name and positions of all corporate officers or officials having the responsibility of creating, directing, setting or determining the course of action and/or

POLSINELLI, WHITE, VARDEMAN & SHALTON
A PROFESSIONAL CORPORATION

By:



W. RUSSELL WELSH
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ATTORNEYS FOR DEFENDANT
PITTSBURGH CORNING CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was
forwarded this 8th day of November, 1988, by depositing
same in the United States Mail, postage pre-paid, addressed to:

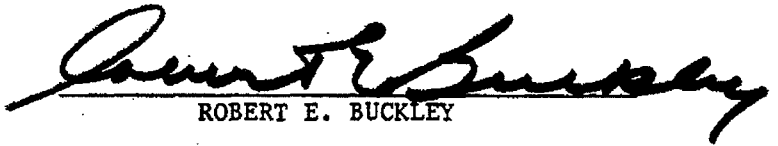
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A F F I D A V I T

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

BEFORE ME, the undersigned authority in and for said Commonwealth and County, personally appeared ROBERT E. BUCKLEY, who being duly sworn, deposes and says that he is the former Vice President and Assistant to the President of Pittsburgh Corning Corporation, that he is currently a Consultant to the Company, that he is authorized to make this affidavit on its behalf, and that the facts contained in the foregoing Response to Master
Set of Interrogatories are true and correct to the best of his knowledge or information and belief.


ROBERT E. BUCKLEY

SWORN TO and subscribed before me

this 4th day of November, 1988.


Notary Public

