



DEN-14-726 #17

MTC 011596

COVER SHEET FOR B-LEVEL DOCUMENTS
REMOVED IN PRIVILEGE REVIEW

ORIGINAL B-LEVEL BOX NO. _____

PRODUCTION BOX NO. Den 22

FILE NO. 4

FILE NAME Dennison Resp rrt-ric

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J-M 03

MTC 011597

MTC 011598

DATA SENT
READY

MESSAGE TRANSMIT DATA Y

DOCTITLE Pipe Division, Epoxy Lining (Denison, Marrero, Long Beach)
SOURCE JMC
IRTRMENT B
MENNAME (1) Jackson, HM
MENLOC (1) Denison PLT

(2) Long Beach PLT

(3) Marrero PLT

TAXCODE (1) BB , JK

CODEDATE 820311

ABSTRACT Handwritten, partly illegible, charts headings Date (range from 620000 to 710000); MFPCF, MPFCF and FICCF marginalia indicates Marrero Tulane University Study File

TEXTLINK

ITEM 23736

ACCNO 017364

MCROFORM

DOCDATEX 721121

DOCTYPE MEM

PAGES 001

CONF CODE (1) RC11

DOCTITLE Denison AR 026-EC-619 Pipe Division Transite Dust Recyclin
g Facilities 928,450 (approval recommended)

SOURCE JMC FENNER, EH

IRTRMENT C

AUTHOR (1) FENNER, EH JMC

ADDRESS (1) WALEN, KU JMC

CODEDATE 820311

TEXTLINK

ITEM 23596

ACCNO

ENTER COMMAND>EXIT

RLC0014 LOGGED OFF T80 AT 13:50:12 ON MAY 18, 1982

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MTC 011599

DOCKING/RECORDING RELATIVES OF INHALED ASBESTOS DUST IN
EXPERIMENTAL BERYLLIUM NEOPLASIA

AUTHOR: SCHEPERS, GW

DOCUMENT NUMBER: JMEA6685 MICROFILM REEL: 00002 FRAME: 0276

DATE: 10/01/60 PAGES: 006

TITLE: ASBESTOSIS AND ABDOMINAL NEOPLASMS

AUTHOR: KEAL, EE

DOCUMENT NUMBER: JMEA6563 MICROFILM REEL: 00000 FRAME: 0000

DATE: 00/00/52 PAGES: 000

TITLE: PURPOSE AND PROGRAM OF THE CANCER PREVENTION COMMITTEE

AUTHOR: SMITH, WE

DOCUMENT NUMBER: JMEA4783 MICROFILM REEL: 00002 FRAME: 0001

DATE: 02/00/55 PAGES: 009

TITLE: OCCUPATIONAL CANCER OF THE URINARY BLADDER IN DYESTUFFS
OPERATIVES AND OF THE LUNG IN ASBESTOS TEXTILE WORKERS AND

IRON ORE MINERS

AUTHOR: BONSER, CH FAULDS, JS

STEWART, MJ

DOCUMENT NUMBER: JMEA4709 MICROFILM REEL: 00001 FRAME: 2052

DATE: 10/00/60 PAGES: 013

TITLE: LUNG CANCER MORTALITY EXPERIENCE OF MEN IN CERTAIN
OCCUPATIONS IN CALIFORNIA

AUTHOR: DUNN, JE LINDEN, G

BRESLOW, L

DOCUMENT NUMBER: JMEA4413 MICROFILM REEL: 00001 FRAME: 1835

DATE: 04/27/58 PAGES: 119

TITLE: OCCUPATIONAL AND ENVIRONMENTAL PULMONARY CANCER WITH
SPECIAL REFERENCE TO PNEUMOCONIOSIS

AUTHOR: HUEPER, WC

DOCUMENT NUMBER: JMEA4363 MICROFILM REEL: 00001 FRAME: 1833

DATE: 00/00/00 PAGES: 002

TITLE: ASBESTOS CARCINOGENESIS

AUTHOR: WAGNER, JC

DOCUMENT NUMBER: JMEA4272 MICROFILM REEL: 00001 FRAME: 1772

DATE: 00/00/43 PAGES: 008

TITLE: ASBESTOSIS AND LUNG CANCER

AUTHOR: WEDLER, H

DOCUMENT NUMBER: JMEA3843 MICROFILM REEL: 00001 FRAME: 1697

DATE: 12/00/51 PAGES: 004

TITLE: ASBESTOSIS ASSOCIATED WITH BRONCHOGENIC CARCINOMA

AUTHOR: STOLL, R

ANGRIST, AA

DOCUMENT NUMBER: JMEA3403 MICROFILM REEL: 00001 FRAME: 1551

DATE: 05/00/42 PAGES: 009

TITLE: BRONCHOGENIC CARCINOMA IN ASSOCIATION WITH PULMONARY
ASBESTOSIS REPORT OF TWO CASES

AUTHOR: KOLLER, WB

ANGRIST, A

DOCUMENT NUMBER: JMEA3180 MICROFILM REEL: 00001 FRAME: 1420

DATE: 00/00/00 PAGES: 030

TITLE: MORTALITY FROM LUNG CANCER AND OTHER CAUSES IN THE
CHRYSOLE ASBESTOS MINES AND HILLS OF QUEBEC

AUTHOR: McDONALD, JC

GIBB, GW

ROSSITER, GE

McDONALD, AD

SIEMIATYCKI, B

MTC 011600

AUTHOR: DOLL,R

DOCUMENT NUMBER: JMEC2088 MICROFILM REEL: 00001 FRAME: 0790
DATE: 00/00/55 PAGES: 060
TITLE: A QUEST INTO THE ENVIRONMENTAL CAUSES OF CANCER OF THE LUNG
AUTHOR: HUEPER,WC

DOCUMENT NUMBER: JMEC2085 MICROFILM REEL: 00001 FRAME: 0770
DATE: 06/00/58 PAGES: 020
TITLE: AN EPIDEMIOLOGICAL STUDY OF LUNG CANCER IN ASBESTOS MINERS
AUTHOR: BRAUN,DC

DOCUMENT NUMBER: JMEC2050 MICROFILM REEL: 00001 FRAME: 0736
DATE: 04/06/64 PAGES: 005
TITLE: ASBESTOS EXPOSURE AND NEUTROPHILIA
AUTHOR: SELLING,IC
HAMMUND,EC

DOCUMENT NUMBER: JMEC0174 MICROFILM REEL: 00001 FRAME: 0536
DATE: 00/00/40 PAGES: 039
TITLE: A FURTHER STUDY OF THE INCIDENCE OF CANCER OF THE LUNG AND
LARYNX
AUTHOR: KENNAWAY,EI

DOCUMENT NUMBER: JMEC0002 MICROFILM REEL: 00001 FRAME: 0524
DATE: 02/00/54 PAGES: 011
TITLE: OCCUPATIONS AND CIGARETTE SMOKING AS FACTORS IN LUNG CANCER
AUTHOR: BRESCLOW,L
KASMUSSEN,C
ABRAMS,HK

ENTER COMMAND/MENU

WELCOME TO THE JOHNS HANVILLE LITIGATION SUPPORT SYSTEM

CODE	DESCRIPTION
1	PRIMARY MEDICAL DOCUMENTS DATABASE
2	SUPPLEMENTARY MEDICAL DOCUMENTS DATABASE
3	ASBESTOS HEALTH EVIDENTIARY DOCUMENTS DATABASE
EXIT	EXIT THE LITIGATION SUPPORT QUERY SYSTEM
MENU	RETURN TO THIS MENU TO SELECT NEW DATABASE
NEWS	NEW SYSTEM INFORMATION

ENTER FUNCTION CODE/3

THE ASBESTOS HEALTH EVIDENTIARY DATABASE IS READY FOR SEARCHING

ENTER COMMAND/SELECT DEFINISON

SET 1 - 85 OCCURRENCES DENISON
SET CONTAINS - 81 DOCUMENTS

ENTER COMMAND/LIST 1 ALL

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ITEM	23788
ACCNO	017409B
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DOC DATEX	710000E
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PAGES	000

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PLEB014 LOGON IN PROGRESS AT 13:40:07 ON MAY 18, 1982
WELCOME TO THE MANVILLE CORPORATION TERMINAL JOB ENTRY SYSTEM
INQUIRE RELEASE 12 11/02/81

MAXIMUM RECORDS TO BE SORTED IS 48608

WELCOME TO THE JOHNS-MANVILLE LITIGATION SUPPORT SYSTEM

CODE	DESCRIPTION
1	PRIMARY MEDICAL DOCUMENTS DATABASE
2	SUPPLEMENTARY MEDICAL DOCUMENTS DATABASE
3	ASBESTOS HEALTH EVIDENTIARY DOCUMENTS DATABASE
EXIT	EXIT THE LITIGATION SUPPORT QUERY SYSTEM
MENU	RETURN TO THIS MENU TO SELECT NEW DATABASE
NEWS	NEW SYSTEM INFORMATION

ENTER FUNCTION CODE>1

THE PRIMARY MEDICAL DOCUMENT DATABASE IS READY FOR SEARCHING

ENTER COMMAND>SELECT CANCER*

SET 1 - 157 OCCURRENCES CANCER*

SET CONTAINS - 41 DOCUMENTS

ENTER COMMAND>COUNT 1 IF DOCDATE LT 65

SET 2 - 17 DOCUMENTS IN 1 DOCDATE LT(65)

ENTER COMMAND>LIST 2

DOCUMENT NUMBER: JNEA7551 MICROFILM REEL: 00009 FRAME: 0761

COVER SHEET FOR B-LEVEL DOCUMENTS
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ORIGINAL B-LEVEL BOX NO. _____

PRODUCTION BOX NO. V-n 21

FILE NO. 4

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Item 8



Johns-Manville

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Internal Correspondence

To: Anita Christen, WHQ 2-18

Date: August 27, 1980

From: J. A. Lawrence, Denison *ja*

Copies:

Subject: DOWNS AND GAGE INTERROGATORIES
YOUR LETTER DATED 8/4/80

Attached are the answers to the questions you requested. Many answers required attachments. All attachments are included except those for Item 43, which are being shipped separate.

If you have any questions, please advise.

/ws

PS. Please return the copies of the Agreements when you have finished.

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July 7

13-5323-102
5323
13-5447-102
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

MAPIAN DOWNS, Individually §
and as Fxecutrix of the Estate §
of Charlie E. Downs, Deceased §
VS. § No. 78-145-CA
 §
JOHNS-MANVILLE CORPORATION,et al§
.

DOPOTHY GAGE, Individually and §
as Administratrix of the Estate §
of Glen Wayne Gage, Deceased, §
et al §
VS. § NO. S-78-155-CA
 §
JOHNS-MANVILLE CORPORATION,et al§

PLAINTIFFS' SECOND SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS ADDRESSED TO
ALL JOHNS-MANVILLE AFFILIATED COMPANIES

TO: Schuyler Marshall, 2300 Republic National Bank Building,
Dallas, Texas 75201, Attorney of record for the above-
named Defendants.

Pursuant to Fed. R. Civ. P. 33 and 34, Plaintiff addresses
the following set of interrogatories and request for production of
documents to all Johns-Manville Affiliated Companies, Defendants
to this action.

Definitions and Instructions

- A. The word "you" refers to all Johns-Manville Affiliated Defendants in this action and all their subsidiary, affiliated, and predecessor companies which are or have been engaged in any asbestos-related business.
- B. The word "plant" refers to the asbestos products plant you operate at Denison, Texas. It also refers to any other asbestos products plants of Johns-Manville which produce similar products.
- C. The word "writing" is used in its broadest sense, and includes any original, reproduction, copy, microfilm, or photograph of any kind of written, recorded, or documentary material, including without limitation, correspondence, memoranda,

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and in tons for each year since the dates identified in response to Question 2 of:

- (i) Raw asbestos fiber;
- (ii) Asbestos-containing products.

(b) State your total annual purchases, if any, in tons and in dollars for each year since the dates identified in response to Question 2 of:

- (i) Raw asbestos fiber;
- (ii) Asbestos-containing products.

4.(i)State how many, if any, you operate of the following:

- (a) Asbestos mines;
- (b) Asbestos mills;
- (c) Plants that produce asbestos-containing products

(ii)State the date of initial operation of all facilities listed in response to 4(i) a-c.

5. State when you first operated the Denison plant.

6. Produce all your organizational charts pertaining to your overall corporate structure or to your organizational structure at the plant and all your annual reports since the plant was first operated.(Counsel agreed to produce organization chart in Denver during deposition of Henry Belchar)

7. State what products have been made at the plant since it was first operated and as to each product:

- (a) Give the dates during which you made each product;
- (b) State each substance used in the manufacture of each product;
- (c) State in what part of the plant each product was made;
- (d) State in what parts of the plant asbestos was stored, handled, or used in the manufacturing process;

RE: C, D, E - TO ANY SUCH FLOW
CHARTS EXIST FOR DENISON?
IF VOLUMINOUS, JUST DESCRIBE
WHAT YOU HAVE; IF NOT,
SEND COPIES

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(e) Produce all maps, charts, or other writings showing or describing the floor plan of the plant since it was first operated; showing or describing the flow of asbestos through the plant from first receipt to final shipment of the product; or otherwise showing or describing the manufacturing process in the plant.

8. Identify the following person:

- (a) All managers of the plant since it was first operated;
- (b) All persons functioning as industrial hygienists at the plant since it was first operated;
- (c) All persons having any responsibility for the maintenance of health and safety at the plant since it was first operated;
- (d) All physicians, nurses, and nurses' aids, whether they were your employees or independent contractors, who provided pre-employment physical examinations, periodic physical examinations, or treatment to employees at the plant since it was first operated;
- (e) All persons having any responsibility for air quality samplings at the plant since it was first operated;
- (f) All persons having any responsibility for the investigation or settlement of workmen's compensation claims at the plant since it was first operated.

9. Have you or any of your officers or employees made any statements at any time since the plant was first operated concerning your knowledge or experience in the field of asbestos-related disease?

(a) Identify, as to each such statement:

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- (iii) The dust concentrations the standard permitted;
 - (iv) The steps you took to comply with the standard and the procedures by which they were implemented;
 - (v) Whether the dust concentrations in the plant, after the standard was adopted, were lesser than, equal to, or greater than those the standard permitted;
- (b) Identify all persons involved in adopting steps and procedures to comply with the standard;
 - (c) Produce all writings concerning the adoption of each such standard and the plant's compliance or non-compliance with the standard.

14. Have you ever adopted by your voluntary action any other standard or guideline for allowable asbestos dust concentrations in the air at the plant. If so,

- (a) State as to each such standard or guideline:
 - (i) The date the standard or guideline was adopted;
 - (ii) The dust concentrations the standard or guideline permitted;
 - (iii) The steps you took to comply with the standard or guideline and the procedures by which they were implemented;
 - (iv) Whether dust concentrations in the plant, after the standard or guideline was adopted, were lesser than, equal to, or greater than those the standard or guideline permitted;
- (b) Identify all persons involved in adopting the standard or guideline or in adopting steps and procedures to comply with it;

REFERS TO REVISION
THROUGHOUT
(ANSWER IS NEARLY NO)

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(iv) The conclusions, recommendations, or comments expressed to you by the person making the visit;

(b) Produce all writings dealing with each such visit, including the results of any testing or air sampling performed.

(17.) Have any of your employees, any of your insurers' employees, or any other person ever measured asbestos dust conditions in the plant? If so,

(a) Identify:

- (i) The date when the measurement began;
- (ii) The frequency of the measurement;
- (iii) The method of measurement used;
- (iv) The results of each measurement;
- (v) The persons responsible for the measurement;

(b) Produce all writings concerning the measurement and the results of the measurement.

(18.) Have any employees at the plant ever been represented by any union? If so,

(a) State as to each such union:

- (i) The name of the union;
- (ii) The specific class of employees that it represented;
- (iii) The dates during which it represented these employees;
- (iv) Whether each of the plaintiffs in this action was represented by the union;

(b) Identify all officials of the union during its representation;

(c) Identify all union personnel having any responsibility for representing employees on matters concerning health and safety conditions in the plant during the union's representation.

PLEASE FORWARD COPIES OF
ASBESTOS DUST COUNTS
MADE AT DENISON.

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Sheet*

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IF ANY UNION CONTRACTS EXIST,
PLEASE FORWARD COPIES.

19. Has any contract with any union referred to in Question 17 contained any provision relating to safety and health at the plant. If so,

(a) State as to each such contract:

- (i) The date the contract was signed;
- (ii) The terms of the provision;
- (iii) Identify the union and management personnel responsible for negotiating the provision;

(b) Produce a copy of the contract and all writings concerning the negotiation and adoption of each such provision.

20. Have you had any conversations or correspondence with representatives of any union referred to in Question 17 concerning alleged asbestos health hazards or the avoidance of them at the plant? If so,

(a) Identify, as to each such conversation or item of correspondence:

- (i) Its date;
- (ii) The persons involved in the conversation or correspondence;
- (iii) The substance of the conversation or correspondence;

(b) Produce the correspondence and all writings concerning it and all writings concerning any such conversation.

21. Have you received any complaints from any representative or committee of any union referred to in Question 17 or from individual workers about dust levels or health conditions at the plant? If so,

(a) Identify as to each such complaint:

- (i) Its date;

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LIMIT TO ASBESTOS-RELATED STUDIES.

- (ii) The person or persons who made the complaint;
- (iii) The person or persons to whom the complaint was made;
- (iv) The nature of the complaint;
- (v) What action, if any, you took in response to the complaint;

(b) Produce all writings concerning each such complaint.

22. Has any epidemiological study or survey of employees at the plant ever been conducted? If so,

(a) Identify as to each such study or survey:

- (i) The date when it was conducted;
- (ii) Its conclusions or recommendations;
- (iii) The persons who conducted it;
- (iv) The persons to whom the study or survey was communicated and when it was communicated;

(b) Produce all writings containing or pertaining to each study or survey.

23. Have you ever employed, or hired as an independent contractor, someone functioning as an industrial hygienist at the plant, whatever his title? If so,

(a) As to each such industrial hygienist:

- (i) Identify him and state the dates during which he was employed or hired;
- (ii) State his duties;
- (iii) State all recommendations or comments that he made concerning the operation of the plant or maintenance of healthful working conditions in the plant;
- (iv) State what action you took in response to each recommendation or comment;

(b) Produce all writings concerning the decision to employ or hire an industrial hygienist; concerning

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PREVIOUSLY SAME AS THOSE INDICATED IN DISC TO #3(B)

any recommendations or comments any industrial hygienist made regarding the operation of the plant and maintenance of healthful working conditions in the plant; and concerning your response to the recommendations or comments.

24. Have you ever employed, or hired as an independent contractor, someone functioning as an industrial hygienist, whatever his title, not located at the plant who reviewed health and safety conditions at the plant? If so,

(a) As to each such industrial hygienist:

(i) Identify him and state the dates during which he was employed or hired;

(ii) State his duties;

(iii) State when, if ever, he visited the plant;

(iv) State all recommendations or comments that he made concerning the operation of the plant and the maintenance of healthful working conditions at the plant;

(v) State what action you took in response to each recommendation or comment;

(b) Produce all writings concerning the decision to employ or hire an industrial hygienist; concerning any recommendations or comments any industrial hygienist made regarding the operation of the plant or maintenance of healthful working conditions at the plant; and concerning your response to such recommendations or comments.

25. Have you ever employed, or hired as an independent contractor, any person, other than an industrial hygienist, who reviewed health and safety conditions at the plant? If so,

(a) As to each such person:

(i) Identify him and state the dates during which he was employed or hired;

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- (ii) State his duties;
- (iii) State all recommendations or comments that he made concerning the operation of the plant and the maintenance of healthful working conditions at the plant;
- (iv) State what actions you took in response to each recommendation or comment;
- (b) Produce all writings concerning the decision to employ or hire each such person; concerning any recommendations or comments he made regarding the operation of the plant or maintenance of healthful working conditions at the plant; and concerning your response to such recommendations or comments.

26. Have you ever employed, or hired as an independent contractor, any person having any responsibility for recommending, adopting, or developing health and safety policies at the plant or elsewhere? If so,

- NO*
MSB
- (a) As to each such person:
 - (i) Identify him and state the dates during which he was employed or hired;
 - (ii) State his duties;
 - (iii) State all policies that he recommended, adopted, or developed regarding health and safety, and state the date of each such recommendation or policy;
 - (b) Produce all writings concerning the decision to hire such person; containing or concerning the health and safety policies; concerning the decision to adopt or develop each such policy; and concerning your implementation of each such policy.

27. Have you ever maintained at the plant a library or collection of books, articles, or other writings dealing with the health consequences of asbestos exposure? If so,

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(a) State:

- (i) The date you began maintaining the library or collection;
 - (ii) The titles of all books, articles, or other writings in the library or collection;
 - (iii) The date each book, article or other writing was acquired;
- (b) Identify all persons who had access to the library or collection;
- (c) Produce all writings dealing with the decision to maintain such a library or collection.

28. Have you ever maintained at a location other than the plant a library or collection of books, articles, or other writings dealing with the health consequences of asbestos exposure? If so,

(a) State:

- (i) The date you began maintaining the library or collection;
 - (ii) The titles of all books, articles, or other writings in the library or collection;
 - (iii) The date each book, article, or other writing was acquired;
 - (iv) Whether personnel at the plant have or may obtain access to the library or collection;
- (b) Identify all persons who had access to the library or collection;
- (c) Produce all writings dealing with the decision to maintain such a library or collection.

29. Have any of your personnel at the plant ever subscribed to or otherwise received any periodicals or other writings pertaining to asbestos or to occupational health or safety? If so,

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(a) State as to each such periodical or other writing:

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- (i) The name of the periodical or other writing;
(ii) The dates during which it was received;
(iii) Identify the person or persons who received it;

(b) Produce all copies of the periodicals or other writings that were received.

30. Have any of your personnel who are located elsewhere than at the plant subscribed to or otherwise received at any time since the plant was first operated any periodicals, or other writings pertaining to asbestos or to occupational health or safety? If so,

- (a) Identify as to each such periodical or other writing;
(i) The name of the periodical or other writing;
(ii) The dates during which it was received;
(iii) The person or persons who received it;
(b) Produce all copies of the periodicals or other writings that were received. ..

31. Have any of your personnel at the plant ever been members of, or attended any meetings of, any trade association or other organization concerned with asbestos, asbestos-containing products, or occupational health and safety? If so,

- (a) As to each such person:
(i) Identify the person;
(ii) State the name and address of each organization to which he belonged or whose meetings he attended;
(iii) State the dates during which he belonged to each organization;
(iv) State the dates of any meetings of each organization that he attended;
(v) State whether he belonged to any committees of each organization and, if so, state the

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(vii) The full citations of any articles, papers, books, or other writings published or prepared as a result of the research;

(b) Produce all writings containing the results of this research or pertaining to it.

38. Have you ever maintained any research laboratory or division at the plant? If so,

(a) State or identify:

- MSB
NO.
- (i) The date when this research laboratory or division was established;
 - (ii) The nature of the research performed there, including specifically whether any research was conducted into the health consequences of asbestos exposure or into methods of controlling asbestos dust;
 - (iii) The conclusions or recommendations, if any, reached concerning health consequences of asbestos exposure or the methods of controlling asbestos dust;
 - (iv) All persons who have headed it since the plant was first operated;

(b) Produce all writings dealing with the decision to maintain the research laboratory or division.

39. Have any of your personnel located at the plant ever attended any conference, symposium, or other meeting concerned with the health consequences of asbestos exposure, the proper methods of working with asbestos or methods of controlling asbestos dust? If so, as to each such conference, symposium, or meeting:

(a) State or identify:

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- (i) The person or organization that sponsored it;
 - (ii) The date and place it was held;
 - (iii) Your personnel who attended it;

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(iv) All information provided there concerning the health consequences of asbestos exposure, the proper methods of working with asbestos, or methods of controlling asbestos dust;

(b) Produce all writings distributed at or concerning the conference, symposium, or meeting.

40. Have any of your personnel located elsewhere than at the plant ever attended any conference, symposium, or other meeting concerned with the health consequences of asbestos exposure, the proper methods of working with asbestos or methods of controlling asbestos dust? If so, as to each such conference, symposium, or other meeting:

(a) State of identify:

- (i) The person or organization that sponsored it;
- (ii) The date and place it was held;
- (iii) Your personnel who attended it;
- (iv) All information provided there concerning the health consequences of asbestos exposure, the proper methods of working with asbestos, or methods of controlling asbestos dust;

(b) Produce all writings distributed at or concerning the conference, symposium, or meeting.

41. State the total amount, if any, in dollars that you spent for the following purposes at the plant during each year since the plant was first operated:

WFR

- (a) Dust control;
- (b) Provision of medical examinations for workers;
- (c) Improvement of health conditions.

42. State the total amount, if any, in dollars that you spent for the following purposes at all your plants during each year since the plant was first operated:

- (a) Dust control at your plants;

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(b) Provision of medical examinations for employees at your plants;

(c) Improvement of health conditions at your plants.

43. Have you ever installed any hoods, fans, sprays, bag houses, or other dust control equipment in the plant? If so,

(a) State when the dust control equipment was first installed in the plant, the nature of the dust control equipment that was then installed, and the nature of any modifications made in the dust control equipment since then;

(b) State, as to each piece of dust control equipment that is currently installed in the plant:

- (i) The specific type of equipment;
- (ii) The manufacturer of the equipment;
- (iii) The specific location where it is installed;
- (iv) The date when it was installed;
- (v) Its cost;

(c) Identify all persons who have had any responsibility for the purchase, design, installation, or maintenance of dust control equipment at the plant since the plant was first operated;

(d) Produce all writings dealing with the purchase, installation, operation, and maintenance of dust control equipment at the plant.

44. Have you ever provided respirators to employees at the plant? If so,

(a) State:

- (i) The type of respirator used;
- (ii) The manufacturer of the respirators;
- (iii) The date when respirators were first made available;

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- (iv) Whether use of respirators is mandatory, and if so, the date use became mandatory and the sanctions for failure to use a respirator;
- (v) Whether each of the plaintiffs in this action ever wore a respirator;
- (vi) The terms of any advice or instructions given to employees at the plant regarding the respirators;
- (vii) The manner by which any advice or instructions regarding the use of the respirators was given to employees at the plant;
- (viii) Whether any of the plaintiffs in this action were ever reprimanded or otherwise disciplined for failure to wear a respirator and, if so, by whom and on what date;

(b) Identify all persons with any responsibility for the respirator program since respirators were first made available at the plant;

(c) Produce all writings dealing with the decision to commence or maintain a respirator program, the purchase of the respirators, their provision to employees at the plant, the advice or instructions given to employees at the plant regarding the respirators, and any disciplinary actions taken against any plaintiff in this action for failure to wear a respirator.

45. Have you ever made any changes in the manufacturing or other processes in the plant, or in other asbestos-related plants that you have operated, in order to reduce the amount of asbestos dust associated with these processes? If so,

(a) State or identify as to each such change:

(i) The nature of the change;

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IF YES, IT WOULD PROBABLY
FALL UNDER TRADE SECRET CATEGORY, BUT
WE NEED INFO
FOR OUR FILES.

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- (ii) The date of the change and the plant in which it was made;
- (iii) All facts that led you to make the change;
- (iv) The reduction in dust levels resulting from it;
- (v) The persons responsible for deciding upon and adopting the change;

(b) Produce all writings concerning each such change.

46. Have you ever changed the type of asbestos fiber you used in the plant, or in other asbestos plants you have operated, in order to reduce dust levels at the plant? If so,

(a) State or identify as to each such change:

- (i) The type of fiber you previously used and the suppliers of that fiber;
- (ii) The type of fiber you used instead and the suppliers of that fiber;
- (iii) The date of the change and the plant in which it was made;
- (iv) All facts that led you to change the type of fiber;
- (v) The reduction in dust levels resulting from it;
- (vi) The persons responsible for deciding upon and adopting the change;

(b) Produce all writings concerning each such change.

47. Have you ever provided showers or change-of-clothing facilities for employees at the plant? If so,

(a) State or identify:

- (i) The nature of the facilities provided;
- (ii) When they were first provided;
- (iii) Whether employees' use of them is mandatory and, if so, when such use became mandatory

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and the sanctions for failure to use the facility;

- (iv) The content of any instructions or advice given to employees to use them;
- (v) The persons responsible for deciding to provide them;
- (b) Produce all writings concerning the decision to provide such facilities.

48. Have you ever provided medical examinations for workers at the plant? If so,

- (a) State or identify:
 - (i) The date when such medical examinations were first given;
 - (ii) The reasons why such medical examinations were given;
 - (iii) The frequency with which each employee was examined;
 - (iv) Whether such examinations included x-rays and pulmonary function tests;
 - (v) Whether employees' participation in such examination was mandatory and, if so, when such participation became mandatory;
 - (vi) All persons who have performed such medical examinations since they were first offered;
 - (vii) Whether each of the plaintiffs in this action was examined;
- (b) Produce all writings concerning the decision to give such medical examinations.

49. Have you ever maintained a training or orientation program for employees at the plant ~~or at other asbestos plants you have operated?~~ If so,

- (a) State or identify as to each such program:
 - (i) The date when the program began;

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 TRAINING FOR THOSE WORKING
 WITH ASBESTOS

- (ii) Whether each of the plaintiffs in this action participated in the program;
- (iii) The terms of any information concerning health, safety, and the proper methods of working with asbestos given to persons participating in the program;
- (iv) The persons responsible for the program since it was first begun;

- (b) Produce all writings concerning the decision to undertake such a training or orientation program and all writings provided to employees as a part of the program.

50. Have you ever placed any posters, placards, or other writings in the plant to inform employees about the health consequences of asbestos exposure or the proper methods of working with asbestos or controlling asbestos dust? If so,

- (a) State or identify as to each such poster, placard, or other writing:
 - (i) The date it was placed in the plant;
 - (ii) The location in the plant where it was placed;
 - (iii) All information provided in it;
 - (iv) The persons responsible for placing it in the plant;
- (b) Produce all the posters, placards, or other writings, and all writings concerning the decision to place them in the plant.

51. Have you ever distributed any writings to employees that deal with the health consequences of asbestos exposure or the proper methods of working with asbestos or controlling asbestos dust? If so,

- (a) State or identify as to each such writing:
 - (i) The date it was distributed;

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PLS. FORWARDED COPIES

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- (ii) All information provided in it;
- (iii) Whether each of the plaintiffs in this action received copies of it;
- (iv) The persons responsible for distributing it;
- (b) Produce all the writings and all writings concerning the decision to distribute them.

52. Have you ever distributed a company newspaper, newsletter, or any other publication to employees at the plant? If so,

- (a) State or identify:
 - (i) The name of each publication;
 - (ii) The frequency of its publication;
 - (iii) The contents of all articles in it dealing with the health consequences of asbestos exposure or the proper methods of dealing with asbestos or controlling asbestos dust;
 - (iv) Whether each of the plaintiffs in this action received copies of the publication;
 - (v) The persons responsible for distributing each such publication;
- (b) Produce copies of all issues of each such publication distributed.

53. Have you ever conducted any meetings, grievance sessions, or film shows at the plant dealing in whole or in part with the health consequences of asbestos exposure or the proper methods of working with asbestos or controlling asbestos dust? If so,

- (a) State or identify as to each such meeting, grievance session, or film show:
 - (i) The date it was held;
 - (ii) All information provided there concerning the health consequences of asbestos exposure or

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the proper methods of dealing with asbestos or controlling asbestos dust;

(iii) Whether each of the plaintiffs in this action attended it;

(iv) The persons responsible for holding it;

(b) Produce all writings distributed at the meetings, grievance sessions, or film shows, all writings dealing with the decision to hold them and a copy of any film that was shown.

54. Have you ever informed employees at the plant in any way not already described in your answers about the health consequences of asbestos exposure or the proper methods of working with asbestos or controlling asbestos dust? If so,

(a) State or identify:

(i) The manner in which the employees were so informed;

(ii) The date when they were so informed;

(iii) All information provided to the employees;

(iv) Whether each of the plaintiffs in this action was so informed;

(v) The persons responsible for so informing the employees;

(b) Produce all writings containing such information or dealing with the decision to provide it.

55. Have any of your foremen, supervisors, or management personnel at the plant ever received any formal or informal training regarding the health consequences of asbestos exposure or the proper methods of working with asbestos or controlling asbestos dust? If so,

(a) Identify each person who received this training, and identify the persons who provided his training;

(b) State as to each person who received this training:

(i) The dates of his training;

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(ii) All information provided there concerning the proper methods of working with asbestos or controlling asbestos dust or the health consequences of asbestos exposure;

(c) Produce all documents regarding the training.

56. State, as to each of your present or former employees who is a plaintiff in this action:

- (a) The date he first worked in the plant;
- (b) All positions and locations in which he has worked in the plant and the dates he worked in each position and location;
- (c) The specific tasks he performed in each position;
- (d) The name and current address of his immediate supervisor in each position;
- (e) When you first became aware that he claimed to be suffering from an asbestos-related disease;
- (f) The manner in which you became aware that he claimed to be suffering from an asbestos-related disease;
- (g) Whether he has filed a claim for workmen's compensation due to an asbestos-related disease and, if so, when the claim was filed, the docket number of the claim, and the amount of the award, if any, that he received as a result of the claim.

57. Produce all writings concerning the employment history of each of your employees or former employees who is a plaintiff in this action, concerning each such person's medical history, and concerning any workmen's compensation claim filed by each such person; copies of all x-rays taken of each plaintiff; and all medical reports made to you or to each plaintiff concerning his medical condition.

58. Do you have any policy regarding the retention or destruction of corporate records or other writings? If so,

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- (a) State:
 - (i) When the policy was adopted;
 - (ii) What the policy is;
- (b) Identify all persons supervising the retention or destruction of corporate records since the plant was first operated;
- (c) Produce all writings describing the policy and its adoption.

59. List all suppliers to the Denison, Texas facility of:

- (a) Raw asbestos fiber;
- (b) Asbestos containing products for each year beginning 1958 to 1979.

60. State the use of each such product or fiber supplied to the Denison facility for each year 1958 to 1979.

Handwritten: 61. State whether purchases of raw asbestos fiber and/or asbestos containing products were made by a purchasing agent at Denison or by a central purchasing agent.

Handwritten: 62. List all purchasing agents or departments for the Denison, Texas plant and state their duty status:

- (a) At the time of purchase;
- (b) Currently.

Handwritten: 63. State whether purchases of asbestos fibers and/or asbestos containing products for the Denison plant are retrievable on a computer and, if so, state the manner in which they can be retrieved.

64. For every year of operation list all products manufactured at the Denison, Texas facility.

Handwritten: 65. Produce all purchase invoices, sales records, shipment vouchers, computer printouts, or other documents or indicia of purchase of asbestos fiber or asbestos containing products at the Denison facility for the years 1958 through 1979.

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 WITHIN HENRY BLECHER'S
 AREA OF RESPONSIBILITY.

66. With respect to raw asbestos fiber purchased or supplied by any subsidiary or affiliated company of Johns-Manville, state when:

- (a) A warning label was first attached to bags or containers of fiber;
- (b) A letter to workers was issued advising specifically of the risk of contacting:
 - (i) Asbestosis;
 - (ii) Lung cancer;
 - (iii) Mesothelioma.

67. State whether any company defendant in this litigation was a member of any trade association or association or organization of asbestos producer which this defendant was a member of and, if so,

- (a) List each such company defendant and organization.

68. State which corporate entity of Johns-Manville owned and operated and controlled the Denison facility for each year of operation and state:

- (a) Whether said entity is still in existence;
- (b) Whether and how said entity has been purchased, merged, combined or absorbed or taken over by another Johns-Manville entity.

69. List all asbestos fiber types and grades and sizes employed in the manufacture of asbestos cement pipe at the Denison facility for each year of operation.

70. State whether bids or specifications are entertained or extended or accepted for asbestos fibers obtained from suppliers and, if so, where records of same can be obtained.

71. With respect to raw asbestos fiber, state whether bids, sales or purchase or shipment or other records indicating receipt or purchase of asbestos fiber are maintained:

- (a) Separately for the Denison facility;

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- (b) Separately for the Asbestos Cement Pipe Division for each year 1958-1980.

72. State whether any records exist in any department purchasing, finance accounts payable, or other, which reflect purchase, receipt or other indicia of the obtaining of asbestos fiber for use at Denison.

73. For each year of operation at Denison, state with specificity the manner or method of:

- (a) Ordering raw asbestos fiber for Denison;
- (b) Ordering raw asbestos fiber for the Asbestos Cement Pipe Division;
- (c) Receipt of bids or purchase orders, shipment records or other indicia of purchase from suppliers of asbestos fiber to Denison;
- (d) Receipt of asbestos fiber to the Asbestos Cement Pipe Division.

74. State whether or not OSHA has ever reprimanded, cited, fined or sanctioned the Denison plant for violations of the Occupational Safety and Health Act, and if it has specify:

- (a) The date of the inspection which lead to any such action;
- (b) The date of the notice to the Denison plant of any such action;
- (c) The exact nature of such action;
- (d) The amount of any fine assessed against Defendant;
- (e) The exact reason or reasons for any such reprimand, citation, fine or sanction;
- (f) Produce any and all notices of violations, citations, written correspondence or other writings of any kind relating to any action by OSHA herein inquired about.

LIMIT TO ASBESTOS FIBER
DUST VIOLATIONS

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