

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

RECEIVED

BETTY PEERENBOOM, ET AL
PLAINTIFFS

VS.

B.F. GOODRICH COMPANY, ET AL
DEFENDANTS

File
DEC 21 1982
H. J. FAST
CIVIL ACTION NO. 81-0698 L (A)

ANSWERS OF DEFENDANT,
B. F. GOODRICH COMPANY,
TO PLAINTIFF'S INTERROGATORIES
OF NOVEMBER 10, 1982

1. List all personnel within Defendant corporation's structure who had contact with personnel within the Manufacturing Chemists Association, hereafter MCA, in the period 1964-1974.
- A. It is impossible for this Defendant to know each individual within its Corporate Structure who may had some contact with the Manufacturing Chemists Association at any one period of time. However, the following witnesses are deemed by the Defendant to be the most knowledgable people within its Corporate Structure who had any significant contacts with the Manufacturing Chemists Association with respect to the subject matter of this litigation:

Before 1973, W. E. McCormick, retired, 419 Dorchester Road, Akron, Ohio, 44320.

After 1973, Maurice N. Johnson, M.D., Director of Toxicology, B.F. Goodrich Company, 500 South Main Street, Akron, Ohio.

2. Who among the Defendant's personnel in the period 1964-1974 had knowledge of MCA's findings of potential health hazards connected with exposure to hydrocarbons, such as vinyl chloride.
- A. See answer to Number One above.

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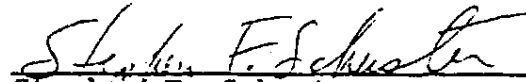
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3. List all personnel who had contact with officials of the Defendant Union in Louisville regarding possible health hazards to plant workers due to exposure to vinyl chloide.
- A. See Answer #3 of the Amended Response of Defendant, B. F. Goodrich Company, to Plaintiff's Request for Production of Documents of February 25, 1982. With that qualification in mind, the personnel within the plant here in Louisville who would have had primary responsibility for such communication with the employees would have been:
 1. From June 1943 to August 1973, H. P. McMath (Deceased)
 2. From August 1973 to May 1976, W. E. Pember, (now employed by Phillip Morris Company in Richmond, Virginia)
 3. From May 1976 to January 1982, Mr. G. R. Pruitt, B. F. Goodrich Company, 500 South Main Street, Akron, Ohio
 4. From January 1982 to present, Mr. W. G. Pop, B. F. Goodrich Company, Louisville, Kentucky
4. List those union officials so advised (as outlined in #3, supra). when, where and how advised.
- A. See Answer #3 of the Amended Response of Defendant, B. F. Goodrich Company, to Plaintiff's Request for Production of Documents of February 25, 1982.
5. Attach hereto copies of any/all notice, warnings or such were given to Defendant Union or its members.
- A. See Answer #3 of the Amended Response of Defendant, B. F. Goodrich Company, to Plaintiff's Request for Production of Documents of February 25, 1982.
6. List whereabouts, title and availability of the following personnel within Defendant's corporation structure.

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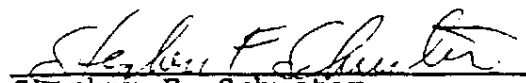
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- (a) W. E. McCormick - Retired, 410 Dorchester Road, Akron, Ohio, 44320.
- (b) P. J. Lawrence - (Under the assumption that the person identified should be P. H. Lawrence) Retired, Post Office Box 1874, Vero Beach, Florida, 32960
- (c) R. H. Wilson - Deceased
- (d) W. M. Larson - Retired, 31550 Trillium Trail, Pepper Pike, Ohio, 44124
- (e) H. R. Pletch - Unable to identify.
- (f) Maurice N. Johnson, M.D. - B.F. Goodrich Company, Director of Toxicology, 500 South Main Street, Akron, Ohio
- (g) Aton Vittone - Deceased


Stephen F. Schuster
OGDEN, ROBERTSON & MARSHALL
1200 One Riverfront Plaza
Louisville, Kentucky 40202
(502) 582-1601

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing was served upon Fredrick Radolovich, Attorney for Plaintiff, Suite 200, 440 South Seventh Street, Louisville, Kentucky 40203, and Mr. Kenneth Sales, Attorney for the Defendant Union, 300 Marion E. Taylor Bldg. Louisville, Kentucky 40202 by hand delivery this 17th day of December 1982.


Stephen F. Schuster
Attorney for Defendants

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

BETTY PEERENBOOM, ET AL.,)

PLAINTIFFS)

VS.)

CIVIL ACTION NO. 81 C 0698L(A)

B. F. GOODRICH,)

DEFENDANT)

NOTICE TO TAKE DEPOSITION

TO: HON. STEPHEN F. SCHUSTER, 1200 One Riverfront Plaza, Louisville,
Kentucky 40202, Attorney for Defendant

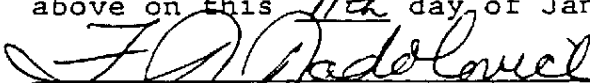
Please take notice that the Plaintiffs will take the deposition
of MAURICE JOHNSON, M.D., for the purpose of discovery, beginning
on Tuesday, the 8th day of February, 1983, at the hour of 10:00
A.M., or as soon thereafter as Counsel can be heard, in the
offices of Dr. Johnson at the B. F. Goodrich Complex in Akron,
Ohio, and will continue taking said deposition every day there-
after, Sundays excepted, until completed.

RADOLOVICH, HARRINGTON & LEVY, PSC

*For filing in
case*

Attorneys for Plaintiffs
Suite 200, 440 South Seventh Street
Louisville, Kentucky 40203
585-1168

The undersigned certifies that a copy hereof
was mailed to the person and address listed
above on this 11th day of January, 1983.


RADOLOVICH, HARRINGTON & LEVY, PSC

RADOLOVICH,
HARRINGTON &
LEVY, P.S.C.
ATTORNEYS AT LAW
440 SOUTH SEVENTH ST
LOUISVILLE, KY 40203

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