

FILE NAME: Rogers Corporation (ROG)

DATE: 2012

DOC#: ROG026

DOCUMENT DESCRIPTION: Legal - Defendant Rogers Corporation's Responses to Plaintiffs' Requests for Admission, Interrogatories and Requests for Production

Ex. 303

STATE OF CONNECTICUT

IN RE: BRIDGEPORT ASBESTOS
LITIGATION

SUPERIOR COURT JUDICIAL
DISTRICT OF FAIRFIELD AT
BRIDGEPORT

DOCKET NO.: CV-11-6023127-S

ERICK LAGERBERG and MARSHA LAGERBERG,
Plaintiffs,

VS.

ARMSTRONG INTERNATIONAL, et al.,
Defendants.

**DEFENDANT ROGERS CORPORATION'S
RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION, INTERROGATORIES
AND REQUESTS FOR PRODUCTION**

Defendant Rogers Corporation ("Rogers Corp." or "Responding Defendant"), individually and by counsel, and pursuant to the Connecticut Rules of Civil Procedure, hereby responds to Plaintiff's Requests for Admission, Interrogatories and Request for Production as follows:

PRELIMINARY STATEMENT

Rogers Corp.'s Responses to each of these Requests for Admission, Interrogatories, and Requests for Production incorporates this Preliminary Statement.

(a) The information supplied in these Responses is not based solely upon the knowledge of the executing party, but includes substantial information assembled by and/or within the knowledge of the party's authorized agents, representatives, and, unless privileged, attorneys. Because much of the information is of, or relates to, events of many years ago, it is difficult, if not impossible, for Responding Defendant to retrieve or reconstruct some of the requested information. Many of the individuals, who might have had personal knowledge of the matters to which Plaintiff's discovery relate are deceased or are otherwise unavailable to Responding Defendant, and investigations to date indicate that some information in documents which might relate to matters inquired into by Plaintiff's discovery may have been destroyed.

Responding Defendant is engaged in a continuing investigation in an attempt to locate or confirm the absence of such information or documents, and Responding Defendant is also engaged in a continuing investigation with respect to the matters inquired into by Plaintiff's discovery. Therefore, Responding Defendant reserves the right to amend these responses if new or more accurate information becomes available or errors are discovered. Furthermore, these responses are given without prejudice to Responding Defendant's right to rely on at trial subsequently discovered information or on information inadvertently omitted from these responses as a result of mistake, error or oversight.

(b) The word usage and sentence structure is that of the attorneys who, in fact, prepared these Answers and does not purport to be the exact language of the executing party.

(c) The Requests for Admission, Interrogatories, and Requests for Production have been interpreted and answered in accordance with the Connecticut Rules of Civil Procedure and plain English usage, and, to the extent not specifically challenged by objection, the definitions and instructions of same were included.

(d) Rogers Corp. further objects to these Requests for Admission, Interrogatories, and Requests for Production, as Responding Defendant has not been provided with sufficient information by Plaintiff to enable it to respond fully to these discovery requests. The Plaintiff has not identified with specificity the product(s) allegedly manufactured by Rogers Corp., which Plaintiff claims were a substantial causative factor in producing his/her alleged asbestos-related disease.

(e) The Responses are limited to those matters not subject to the attorney-client privilege and to those matters that do not constitute attorney work product.

(f) Rogers Corp. will answer to the best of its knowledge, information and belief, reserving the right to supplement these Responses once it has obtained additional information.

(g) Rogers Corp. objects to these Requests for Admission, Interrogatories, and Requests for Production to the extent they imply that Rogers Corp. was under a duty to provide warnings for its products or that any products manufactured by it would expose workers to harmful dust levels.

(h) In responding to these Requests for Admission, Interrogatories, and Requests for Production, Responding Defendant does not concede the relevancy, materiality or admissibility of any information sought by the discovery requests or any Responses thereto. The Responses are made subject to and without waiver of any questions or objections as to the competency,

relevancy, materiality, privilege or admissibility of evidence, documents or information referred to herein, or the subject matter thereof, in any proceeding including trial.

GENERAL OBJECTIONS

Responding Defendant makes the following additional General Objections to these Requests for Admission, Interrogatories, and Requests for Production:

GENERAL OBJECTION NO 1.

Responding Defendant objects to these Requests for Admission, Interrogatories, and Requests for Production to the extent that they seek information subject to the attorney-client privilege or which constitutes protected work product.

GENERAL OBJECTION NO 2.

Responding Defendant objects to each discovery request to the extent that it calls for proprietary and/or confidential business information and, as such, is protected from disclosure as trade secret information. Responding Defendant's Responses to these Requests for Admission, Interrogatories, and Requests for Production are made without waiver of any such privilege or protection against disclosure.

GENERAL OBJECTION NO 3.

These Requests for Admission, Interrogatories, and Requests for Production are not product specific, and as such, Responding Defendant objects.

GENERAL OBJECTION NO 4.

Responding Defendant objects to any definition within these Requests for Admission, Interrogatories, and Requests for Production that purports to include entities other than Rogers Corp., which is the entity named in the above captioned litigation. Each of the following Responses to Requests for Admission are limited in scope as described in the Preliminary Statement. Similarly, Responding Defendant objects to any discovery request that encompasses products not at issue in this litigation.

REQUESTS FOR ADMISSION

1. With reference to the attached Exhibit 1, admit that Rogers is "Source #4" referenced throughout the document but particularly described at the bottom of page 1223 and onto page 1224.

Response to Request No. 1

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as burdensome, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant can neither admit nor deny this Request for Admission as it was not the author of the referenced publication.

2. Admit that Rogers utilized chrysotile asbestos in its manufacturing process in its plant in Rogers, CT.

Response to Request No. 2

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific product, location or time, and thus, seeks information that is wholly irrelevant to the present case and not reasonably calculated to lead to the discovery of admissible evidence. By way of further answer and without waiver of the foregoing objections and subject thereto Responding Defendant states that some of its products manufactured at its Rogers, CT facility utilized chrysotile asbestos as an ingredient.

3. Admit that Rogers utilized crocidolite asbestos in its manufacturing process in its plant in Rogers, CT.

Response to Request No. 3

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific product, location or time, and thus, seeks information that is wholly irrelevant to the present case and not reasonably calculated to lead to

the discovery of admissible evidence. By way of further answer and without waiver of the foregoing objections and subject thereto Responding Defendant states that some of its products manufactured at its Rogers, CT facility utilized crocidolite asbestos as an ingredient.

4. Admit that the Rogers plant in Rogers, CT emitted chrysotile asbestos fibers into the ambient air outside the plant.

Response to Request No. 4

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects that this Request prematurely calls for expert testimony. Responding Defendant can neither admit nor deny this Request.

5. Admit that the Rogers plant in Rogers, CT emitted crocidolite asbestos fibers into the ambient air outside the plant.

Response to Request No. 5

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects that this Request prematurely calls for expert testimony. Responding Defendant can neither admit nor deny this Request.

6. Admit that the Rogers plant in Rogers, CT utilized asbestos every year between 1950 and 1980, inclusive.

Response to Request No. 6

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific product, location or time, and thus, seeks

information that is wholly irrelevant to the present case and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to the term "asbestos" as used in this request as it is vague and overbroad. Without waiver of the foregoing objections and subject thereto, Responding Defendant admits that asbestos was utilized in the manufacture of certain products beginning in 1950 and continuing to 1983/1984. However, as to what fiber type and what quantities were utilized during which years, investigation is ongoing. Responding Defendant reserves the right to supplement its response hereto.

7. Admit that the Rogers plant in Rogers, CT purchased asbestos fiber or asbestos-containing materials from each of the following entities:

- a. North American Asbestos Corporation
- b. Johns-Manville Corporation
- c. Special Materials, Inc.;
- d. Hollingsworth & Vose;
- e. Associated Mineral Corporation, AG;
- f. Union Carbide Corporation;
- g. Cassiar Asbestos Corporation, Ltd.;
- h. Carey-Canadian Mines.

Response to Request No. 7

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant objects to this Request because it is not sufficiently limited to a specific product, location or time, and thus, seeks information that is wholly irrelevant to the present case and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, Responding Defendant states: Admitted in part, denied in part. Rogers Corp. has purchased asbestos from the following: Associated Mineral Corporation, North America Asbestos Corporation, Special Materials Inc., Johns Manville and Union Carbide. By way of further answer, investigation is ongoing.

8. Admit that the Rogers plant in Rogers, CT purchased a product called

“Paperbestos” from Hollingsworth & Vose.

Response to Request No. 8

See Preliminary Statement and General Objections. Responding Defendant objects to this Interrogatory as burdensome, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the above objections and subject thereto, Responding Defendant states that after reasonable investigation, one purchase order for 44,000 lbs. of “Paperbestos #5” from Hollingsworth & Vose, dated 5/11/78 has been located.

INTERROGATORIES

1. Please state the name, title, and business address of the person answering these interrogatories.

Response to Interrogatory No. 1

Robert M. Soffer, Vice President and Secretary
P.O. Box 188
Rogers Corporation
One Technology Drive
Rogers, CT 06263-0188

2. With reference to the attached Exhibit 1, please state whether the Rogers plant in Rogers, CT is “Source #4” as referenced in the article.

Response to Interrogatory No. 2

See Objection and Response to Plaintiff’s Request for Admission #1.

3. With reference to the attached Exhibit 1, please state with specificity what, if any, interaction Rogers had with the article authors (Bruckman and Rubino) and what, if any, information or documents Rogers provided to the authors.

Response to Interrogatory No. 3

See Preliminary Statement and General Objections. Responding Defendant objects to this Interrogatory as burdensome, vague, ambiguous, and not reasonably calculated to lead to the

discovery of admissible evidence. Without waiving the above objections and subject thereto, Responding Defendant states that after a reasonable investigation, it is without information regarding any contact or information provided to the article authors regarding the drafting of the article.

4. Please state with specificity whether Rogers has ever conducted, or directed a third-party to conduct, any air testing of the ambient air outside of the Rogers plant in Rogers, CT or in the surrounding towns for the presence of asbestos, and if so, please state with specificity what the results were.

Response to Interrogatory No. 4

See Preliminary Statement and General Objections. Responding Defendant objects to this Interrogatory as burdensome, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of the foregoing objections and subject thereto, Responding Defendant states: See Objection and Response to Plaintiff's Request for Production of Documents.

5. Please state with specificity whether Rogers has ever conducted, or directed a third-party to conduct, any air testing of the air inside the Rogers plant in Rogers, CT for the presence of asbestos and, if so, please state with specificity what the results were.

Response to Interrogatory No. 5

See Preliminary Statement and General Objections. Responding Defendant objects to this Interrogatory as burdensome, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of the foregoing objections and subject thereto, Responding Defendant states: See Objection and Response to Plaintiff's Request for Production of Documents.

6. Please state with specificity whether Rogers ever provided any warnings, cautions or notices of any kind to the residents or municipal government of Rogers, CT or any of the surrounding towns regarding potential asbestos emissions from the Rogers plant.

Response to Interrogatory No. 6

See Preliminary Statement and General Objections. Responding Defendant objects to this Interrogatory as vague, overly broad, burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant objects to these Interrogatories to the extent they imply that Rogers Corp. was under a duty to provide warnings for its products or that any products manufactured by it would expose workers or others to harmful dust levels. Responding Defendant further objects to this Interrogatory because it is not sufficiently limited to a specific location or time, and thus, seeks information that is wholly irrelevant to the present case and not reasonably calculated to lead to the discovery of admissible evidence.

By way of further objection, Responding Defendant objects hereto as this interrogatory seeks discovery of information and materials beyond the permissible scope of discovery. Without waiving the above objections and subject thereto, Responding Defendant states that it became generally aware of the hazards associated with asbestos in the early 1970s through various media outlets; however, Defendant does not recall when, if at all, it received information linking asbestos exposure to any specific disease.

REQUESTS FOR PRODUCTION

1. Please produce complete color copies of any and all documents relied on in answering the preceding interrogatories.

Response to Request No. 1

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is

ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

2. Please produce complete color copies of any and all documents relied on in answering the preceding requests for admission

Response to Request No. 2

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

3. Please produce complete color copies of any and all documents pertaining to the defendant's production, sale, supply, distribution and/or purchase of asbestos-containing products.

Response to Request No. 3

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to

this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

4. Please produce complete color copies of any and all documents pertaining to any and all of the subjects addressed in the preceding interrogatories.

Response to Request No. 4

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

5. Please produce complete color copies of any and all documents pertaining to any and all of the subjects addressed in the preceding requests for admission.

Response to Request No. 5

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this

Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

6. Please produce complete color copies of any and all material safety data sheets pertaining to any and all asbestos-containing products obtained by the defendant and/or sold by the defendant.

Response to Request No. 6

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

7. Please produce complete color copies of any and all testing or analytical reports pertaining to asbestos testing of the defendant's products.

Response to Request No. 7

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

8. Please produce complete color copies of any and all catalogs, advertisements, brochures or other documents that show or list any asbestos-containing products.

Response to Request No. 8

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

9. Please produce complete color copy of Erick Lagerberg's personnel file.

Response to Request No. 9

See Preliminary Statement and General Objections. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

10. Please produce complete color copy of Marsha Lagerberg's personnel file.

Response to Request No. 10

See Preliminary Statement and General Objections. Responding Defendant objects to this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

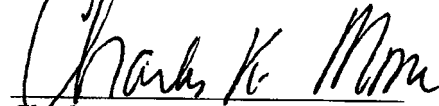
11. Please produce complete color copies of any and all documents or records pertaining to the article attached as Exhibit 1, including but not limited to any and all documents or records that Rogers Corporation provided to, or received from, the authors.

Response to Request No. 11

See Preliminary Statement and General Objections. Responding Defendant objects to this Request as vague, overly broad, unduly burdensome, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Defendant further objects to this Request because it is not sufficiently limited to a specific time, location or product, and thus, seeks information that is wholly irrelevant to the present case. Responding Defendant objects to

this Request to the extent that it seeks information subject to the attorney-client privilege or which constitutes protected work product. By way of further objection, Responding Defendant objects hereto as this Request seeks discovery of information and materials beyond the permissible scope of discovery. Responding Defendant further responds that investigation is ongoing and any and all documents responsive to Plaintiffs' Request for Production of Documents will be produced by Rogers Corp. at a mutually convenient time at the offices of the National Coordinating Counsel or other location to be determined.

The Defendant,
ROGERS CORPORATION,
By its attorneys,



Charles K. Mone
Pierce, Davis & Perritano, LLP
90 Canal Street
Boston, MA 02114
(617) 350-0950
Juris No.: 420348

Dated: February 9, 2012

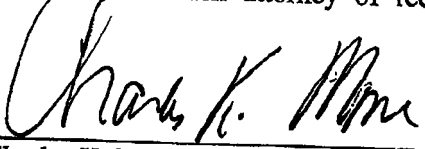
CERTIFICATION

I, Charles K. Mone, hereby certify that a true copy of the above document was served electronically via e-mail to the following Plaintiff's counsel and Defense Liaison counsel:

Christopher Meisenkothen, Esquire
Early, Lucarelli, Sweeney & Meisenkothen, LLC
265 Church Street
P. O. Box 1866
New Haven, CT 06508-1866

John J. Robinson, Esquire
McCarter & English LLP
City Place 1
185 Asylum Street
Hartford, CT 06103

and was served electronically via ctasbestos@listserve.com on each attorney of record on February 9, 2012.



Charles K. Mone

VERIFICATION OF ROBERT M. SOFFER

STATE OF CONNECTICUT

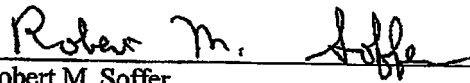
COUNTY OF WINDHAM

)
)
) ss: Rogers, Connecticut

COMES NOW, ROBERT M. SOFFER, who, after being first duly sworn, deposes and states under penalty of perjury, as follows:

1. I am employed by Rogers Corporation as Vice President and Secretary. I am over eighteen years of age, have never been convicted of a felony, and am competent and authorized in all respects to make this verification. I make this verification with the assistance and advice of counsel and other representatives of Rogers Corporation.
2. My business address is Rogers Corporation, P.O. Box 188, One Technology Drive, Rogers, CT 06263-0188.
3. I am authorized to sign this verification to the foregoing Responses to Plaintiff's Interrogatories in the matter of *Erick Lagerberg, et al v. Armstrong International, et al.*, in the Superior Court J.D. of Fairfield at Bridgeport, Connecticut.
4. While I do not have personal knowledge of all the facts recited in the Responses to Interrogatories, they were prepared at my direction, and are true to the best of my knowledge, information and belief, subject to inadvertent errors and limited by information not in possession or undiscovered. Consequently, defendant reserves the right to make any changes in the Responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

FURTHER AFFIANT SAYTH NAUGHT.


Robert M. Soffer
Vice President and Secretary
Rogers Corporation

SUBSCRIBED and SWORN to before me by the Affiant on this 7th day of February, 2012.


Alice Tetreault
Notary Public

My Commission expires June 30, 2014