

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

MAR 2 1992

ARVEL PICKERING,) No. 91 L 1546
ROBERT HARRIS,) No. 91 L 620
CHARLES ANDERSON,) No. 91 L 621
CARL OSTERMAN,) No. 91 L 622
DONALD DOSSETT,) No. 91 L 623
HARRY E. LEWIS,) No. 91 L 624
WILLIAM THOMPSON,) No. 91 L 625

Plaintiffs,)

vs.)

THE ANCHOR PACKING COMPANY,
et al.,)

Defendants.)



NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 28th day of February, 1992, we mailed to the Clerk of the Circuit Court of Madison County, Illinois, certain Responses to Plaintiff's Interrogatories, to be filed on behalf of The Anchor Packing Company, a copy of which is attached hereto.

William F. Mahoney

SEGAL MCCAMBRIDGE SINGER & MAHONEY, LTD.
By: William F. Mahoney
Attorneys For: ANCHOR PACKING COMPANY

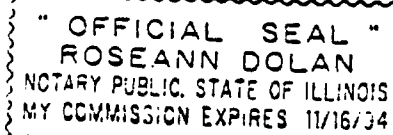
I, Paula C. Vaglica, being first duly sworn on oath, depose and say that a copy of the above-mentioned pleading(s) was/were served on the party(ies) as above addressed, by enclosing a copy of the same in an envelope, sealed, postage prepaid and deposited in the U.S. Mail Chute at Two First National Plaza, 20 South Clark Street, Suite 700, Chicago, Illinois this 28th day of February, 1992.

Paula C. Vaglica

SUBSCRIBED AND SWORN to before me this 28th day of February, 1992.

Roseann Dolan

NOTARY PUBLIC



**BONO SERVICE LIST
MADISON COUNTY ASBESTOS LITIGATION**

ATTORNEYS FOR PLAINTIFF
Bono, Goldenberg, Hopkins
Bilbrey & Hendricks, P.C.
65 East Ferguson Street
Wood River, IL 62095

JOHN CRANE, INC.
Mr. John L. McMullin
Brown, James & Rabbitt
705 Olive Street
Suite 1100
St. Louis, MO 63102

and

FIBREBOARD CORPORATION
Ross & Hardies
150 North Michigan Avenue
Suite 2500
Chicago, IL 60601

Mr. Gary K. Morgan
William R. Gallagher, Ltd.
7930 Clayton Road
Suite 409
St. Louis, MO 63117

WHEELER PROTECTIVE APPAREL
Mr. Ted Harvey
Freeark, Harvey & Mendillo
115 West Washington Street
Belleville, IL 62220

PITTSBURGH CORNING
Mr. Joel A. Poole
Polsinelli, White, Vardeman
& Shalton
16141 N. Outer Forty Drive
Suite 308
Chesterfield, MO 63017

**A.P. GREEN, ARMSTRONG WORLD,
BALDWIN-HILL, BENJAMIN FOSTER,
CERTAIN-TEED, GAF, KEENE,
NATIONAL GYPSUM PFIZER,
ROCKWOOL, U.S. GYPSUM, QUIGLEY
FLEXITALLIC**
Mr. Robert Schultz, Jr.
Heyl, Royster, Voelker & Allen
17 Ginger Creek Meadows
P.O. Box 467
Edwardsville, IL 62025

OWENS-ILLINOIS, INC.
Mr. Robert Riley
Schiff, Hardin & Waite
7200 Sears Tower
233 South Wacker Drive
Chicago, IL 60606

OWENS-CORNING FIBERGLAS
Mr. Steven P. Sanders
Armstrong, Teasdale, et al.
611 Olive Street
Suite 1900
St. Louis, MO 63101

A.W. CHESTERTON
Mr. John J. Kurowski
Kurowski & Courtney, P.C.
12 Park Place Professional
Swansea, Illinois 62221

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Plaintiffs,)

vs.)

THE ANCHOR PACKING COMPANY,
et al.,)

Defendants.)

THE ANCHOR PACKING COMPANY'S RESPONSES
TO PLAINTIFF'S INTERROGATORIES

Defendant, THE ANCHOR PACKING COMPANY ("ANCHOR"), by its attorneys, Segal, McCambridge, Singer & Mahoney, Ltd., responds to plaintiff's interrogatories as follows:

1. Has the corporation issued any stock or other securities?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon order of court, it will produce a statement of its present net worth to the plaintiff.

2. If so, state:

- (a) The date of such issuance;
- (b) The classes and series of stock and other securities;
- (c) The stated value and total paid in capital for each such class and series.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon order of court, it will produce a statement of its present net worth to the plaintiff.

3. Does the corporation own any of its own issued stock as "treasury" stock? If so, describe the nature of and the consideration paid for the corporation's acquisition of its own stock.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon order of court, it will produce a statement of its present net worth to the plaintiff.

4. Does any person or entity hold any options to acquire stock of the corporation from the corporation's "treasury" stock? If so, please describe the nature and details of any such options.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon order of court, it will produce a statement of its present net worth to the plaintiff.

5. During the period 1987 to 1992, inclusive, for each year, state:

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

6. During the above period and for each of such persons, how much time was devoted to the performance of duties of any position held on behalf of the corporation?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

7. During the above period, were any of such persons employed by the corporation as an agent, or in any other capacity, other than as a director or officer of the corporation?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR

asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

8. If so, state the name of each person so employed, the period of time served by each person, the monetary value of salary, wages, bonuses or other remuneration received by each person for each year of service, and the position held and time devoted for each person during each period time.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

9. Has anything been given to any stockholder, member of the board of directors, or officer of the corporation, or members of their families, other than by way of salary, wages or bonuses, such as, without limitation, retirement or pension benefits, insurance benefits, corporate automobiles or expense accounts, loans or gifts?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

10. If so, provide any and all details, such as, without limitation, the name of the person receiving the same, the date, what was given, the approximate value and whether the corporation received any consideration for that which was given.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

11. Does the corporation own and/or maintain any life insurance policies on any stockholders, directors, officers or any other party? If so, for each such policy, please state the name of the insurance company, the policy number, the beneficiary, the anticipated death benefit, the current cash surrender value, and any other pertinent information.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

12. Did the corporation, during the period 1987 to 1992, inclusive, prepare or cause to be prepared a balance sheet, profit and loss statement, financial statement or similar document?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial,

irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

13. For the above statements and periods, did the corporation employ the services of a Certified Public Accountant? If so, state the name and address of each C.P.A. employed, the period(s) for which they were employed, and a description of all services performed by each C.P.A., including without limitation the preparation of any certified financial statements.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

14. Please attach a copy of any financial statement to the answers to interrogatories.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

15. Has the corporation created any funds for surplus capital, depreciation, depletion, contingencies, or any other fund?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

16. If so, state the name of each of the funds, the date on which each fund was created, and the current amount in each of the funds.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

17. Has the corporation prepared any business plans or financial projections related to future operations of the corporation? If so, please state what statements were prepared, by whom were the statement prepared, to whom were the statements distributed or presented, and for what purpose(s) were the statements prepared and/or distributed?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its

present net worth to the plaintiff.

18. Provide copies of any such plans or financial projections.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

19. Do the financial statements for the corporation for the period 1987 to 1992 accurately reflect the operating performance of the corporation in accordance with generally accepted accounting principles consistently applied?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

20. Do any of the financial statements referred to above contain any extraordinary and/or non-recurring items of income and/or expense? If so, please list each and every such item, a description of its source or cause, an explanation of how it arose and why it is a non-recurring item, its dollar amount, and its effect on the financial statement on which it is presented.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

21. For each source of cash or cash equivalents not reflected in the Corporation's Profit and Loss Statements for the periods referenced above, please state the source, nature, amounts, and any further relevant details regarding said sources.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

22. For each use of cash or cash equivalents not reflected in the corporation's Profit and Loss Statements for the periods referenced above, please state the description, nature, amounts, and any further relevant details regarding said use.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its

present net worth to the plaintiff.

23. For each source or use of funds of the Corporation related to loans or repayment of loans, please provide all details on any such loans which were with related parties or on non-market rate terms.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

24. To the extent not previously disclosed in these interrogatories, please detail any and all transactions between the corporation and any related party.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

25. Do the balance sheets, financial statements, and/or other similar statements for the corporation for the period 1987 to 1992 accurately reflect the assets, liabilities and net worth of the corporation in accordance with generally accepted accounting principles consistently applied.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative,

harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

26. Did the corporation for the period 1987 to 1992, inclusive, prepare or cause to be prepared, any adjusted financial statements or balance sheets which reflect assets and liabilities as their current Fair Market Value as opposed to their basis for book and/or tax purposes? If so, please provide copies.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

27. Do any of the corporation's assets or liabilities have a fair market value different than the value reflected on the corporation's balance sheet, financial statements, or other similar documents? If so, please identify all said assets and/or liabilities, their current fair market value, and the means or methodology of determining said market value.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

28. Does the corporation own or have the right to any patents, copyrights, intangible assets, or other assets which are not reflected on the balance sheets or financial statements referenced herein? If so, please describe details regarding said assets, their value, and how said value was determined.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff. -

29. Does the corporation own or have the right to any other property which is currently being held by another party or entity. If so, please provide details for each and every such asset.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

30. Has the corporation during the period 1987 to 1992, inclusive, transferred or received any property or asset for less than full market value? If so, please provide details for each and every such transaction.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial,

irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

31. Is the corporation involved in any pending litigation, either as plaintiff or defendant, or is the corporation aware of any other contingent assets or liabilities not previously disclosed herein, which would affect the corporation's profit and loss, financial statements, balance sheet, or net worth? If so, please provide details for each and every such item.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

32. Did the corporation, during the period 1987 to 1992, inclusive, ever declare and/or pay any cash or stock dividends?

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

33. If so, please state the date and the amount of each dividend declared and/or paid.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

34. Does the corporation owe to any person any cumulative dividends which have not been declared and paid? If so, please provide detailed information concerning same.

ANSWER: ANCHOR objects to this interrogatory on the grounds that it is overly broad, burdensome, vague, ambiguous, argumentative, harassing and because it seeks information which is immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, ANCHOR asserts that upon court order, it will produce a statement of its present net worth to the plaintiff.

Respectfully submitted,

THE ANCHOR PACKING COMPANY

By: William F. Mahoney
One of its Attorneys

Edward J. McCambridge
William F. Mahoney
Robert E. Wilens
Segal, McCambridge, Singer & Mahoney, Ltd.
Two First National Plaza
20 S. Clark Street
Suite 700
Chicago, Illinois 60603
(312) 782-3800