Fireman's Fund

Fireman's Fund
Insurance Company

R. Patrick White
Regional Director
Staff Counsel
Direct Line: (415) 541-3727

May 15, 1998

PLAINTIFF'S EXHIBIT
ON-68

VIA FACSIMILE AND FEDERAL EXPRESS
(214) 520-1181

Steven D. Wolens, Esq.
Baron & Budd
The Centrum
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281

Re: The Ferro Engineering Division of Oglebay Norton Company ("Ferro")
Butler County, Ohio Cases

Dear Steve:

This letter will respond to yours of April 20, 1998, wherein you requested production of documents following Mr. Gabriel's deposition of April 7, 1998.

Request for Production No. 1:

The second In-Road book containing records of sales/deliveries of Ferroboard to Armco-Middletown, Ohio.

Response to Request for Production No. 1:

Defendant previously produced the requested In-Road book **(Bates No. FE001928-FE001938)** on October 23, 1997. Another copy of the requested In-Road is enclosed.

Request for Production No. 2:

The Oglebay Norton Products and Services catalogs for the years, 1947-1959 and 1968-1973.

Response to Request for Production No. 2:

Defendant hereby produces Oglebay Norton's Products and Services Catalogs for the years 1954-1959 and 1969, 1970 and 1972 **(Bates Nos. FE003547-FE004166)**. Defendant is unable to locate catalogs for the years 1947-1953, 1968, 1971 and 1973.Request for Production No. 3:

The Oglebay Norton Annual Reports for the years 1970-1991.

Response to Request for Production No. 3:

Defendant produces Oglebay Norton's Annual Reports from 1970 to 1983 and 1985 to 1991 **(Bates Nos. FE004167-FE004825)**. Defendant is unable to locate Oglebay Norton's 1984 Annual Report.

Request for Production No. 4:

The Ferro Engineering Product Formulation sheets that Mr. Gabriel referenced regarding the asbestos-containing products Ferro produced.

Response to Request for Production No. 4:

Defendant objects to this Request for Production as it seeks information which is proprietary in nature which constitute the trade secrets of this defendant.

Request for Production No. 5:

All Purchase Order books indicating sales of asbestos-containing products.

Response to Request for Production No. 5:

Defendant is unable to locate any Purchase Order books.

Request for Production No. 6:

All Invoices referencing asbestos-containing products.

Response to Request for Production No. 6:

Defendant hereby produces all Invoices which have been located referencing asbestos containing products shipped to Armco Middletown **(Bates Nos. FE004826-FE004861)**. Defendant notes the produced invoices also contain references to "C&D X-O Top Covering", a non-asbestos containing product.

Request for Production No. 7:

All Quote Books referencing asbestos-containing products.

Response to Request for Production No. 7:

Defendant hereby produces all product quotations which have been located for Armco Middletown **(Bates Nos. FE004862-FE004865)**. Defendant notes the produced product quotations also contain references to "C&D X-O Top Covering" and "Mold Clip", which are non-asbestos containing products.

Request for Production No. 8:

All Sales Books referencing asbestos-containing products.

Response to Request for Production No. 8:

Defendant is unable to locate any Sales Books referencing asbestos-containing products.

Sincerely yours,

R. PATRICK WHITE
National Coordinating Counsel for Oglebay Norton Company

RPW/rln
Enclosures
cc: Regina M. Massetti, Esq. (w/o encls.)
William Viscomi, Esq. (w/o encls.)
Mr. Roger L. Nguyen (w/o encls.)

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