

PLAINTIFF'S EXHIBIT

JM-2478

NO. 77 C 3534

(b) The quantities of each type of asbestos supplied by each person or organization annually during the period 1946 to the present date.

ANSWER: Defendant does not possess records back to 1946 but states that asbestos types amosite, chrysotile and crocidolite have been used at the Waukegan plant over the years.

(a) Attached As Exhibit A is a list of vendors who have supplied asbestos over the years to Johns-Manville locations. At present, it is not possible to state which vendors sold to the Waukegan location. Defendant will continue to search its records and will supplement this Interrogatory accordingly. In addition to the vendors listed on Exhibit A, fiber was supplied by the Canadian Johns-Manville Company mine in Asbestos, Quebec.

(b) Defendant objects to furnishing all quantities of fiber ever purchased, as the same is overly burdensome. Defendant is unable at this time to determine the exact quantities used at the Waukegan plant but will continue to search its records and will supplement this Interrogatory accordingly.

(c) Unknown as to the vendors listed on Exhibit A. Fiber has been packaged in the following manner by Canadian Johns-Manville Company: jute, valve paper, jute and polyethylene, woven polyethylene, pressure-packed multi-walled Kraft paper and polyethylene film.

(d) Unknown as to the vendors listed on exhibit A. As to Canadian Johns-Manville Company:

Defendant placed warning notices on the packaging of its asbestos fiber. The warning labels and the dates of use are as follows:

CAUTION

THIS BAG CONTAINS ASBESTOS FIBER.

PERSONS EXPOSED TO THIS MATERIAL SHOULD
USE ADEQUATE PROTECTIVE DEVICES AS
INHALATION OF THIS MATERIAL OVER LONG
PERIODS MAY BE HARMFUL.

(1969-1972)

CAUTION

Use of warning labels was commenced during 1969. The label presently in use is prescribed by the United States Department of Labor, Occupational Safety and Health Administration (OSHA) pursuant to 29 C.F.R. Sec. 1910.1001, such regulation being promulgated by OSHA in 1972. Defendant also places this warning on all bags containing asbestos fiber in five additional languages; i.e., French, Dutch, German, Spanish and Japanese.

2. State whether any asbestos used or processed at the Waukegan plant was purchased or acquired from the General Service Administration or any branch or agency of the United States Government during the period 1946 to the present date. If the answer is in the affirmative, state:

(a) The name and address of the agency which supplied the asbestos.

(b) The types of asbestos supplied.

(c) The quantities of each type of asbestos supplied annually during the period 1946 to the present date.

(d) The means of packaging.

(e) The health warnings, if any, which accompanied each shipment of asbestos and indicate when said warnings were first made part of the shipments.

ANSWER: Defendant has purchased fiber from the General Services Administration but it is unknown at the present time whether or not any of this fiber was utilized at the Waukegan plant. Defendant will continue to search its records and will supplement this Interrogatory accordingly.

(a)-(c) See Answer to Interrogatory No. 2 above and Exhibit B attached hereto for purchases made by Johns-Manville.

(d)-(e) Unknown.

3. Has defendant purchased asbestos from Cassiar Asbestos Corporation, Ltd., which was used or processed at the Waukegan plant during the period 1946 up to the present date? If answer is in the

Cassiar Asbestos Corporation, Ltd. annually during the period 1946 to the present date.

(c) The means of packaging.

(d) The health warnings, if any, which accompanied each shipment of asbestos and indicate when said warnings were first made part of the shipments.

ANSWER: Defendant has purchased fiber from the Cassiar Asbestos Corp., Ltd. but it is unknown at the present time whether or not any of this fiber was utilized at the Waukegan plant. Defendant will continue to search its records and will supplement this Interrogatory accordingly.

(a)-(c) See Answer to Interrogatory No. 3 above and Exhibit C attached hereto for purchases made by Johns-Manville.

(d)-(e) Unknown.

4. Has defendant purchased asbestos from General Mining and Finance Corporation, Ltd., Republic of South Africa, which was used or processed at the Waukegan plant during the period 1946 to the present date? If answer is in the affirmative, state:

(a) The type of asbestos used or processed.

(b) The quantities of each type of asbestos supplied by General Mining annually during the period 1946 to the present date.

(c) The means of packaging.

(d) The health warnings, if any, which accompanied each shipment of asbestos and indicate when said warnings were first made part of the shipments.

ANSWER: Defendant has purchased fiber from the General Mining & Finance Corp., Ltd. but it is unknown at the present time whether or not any of this fiber was utilized at the Waukegan plant. Defendant will continue to search its records and will supplement this Interrogatory accordingly.

(a)-(c) See Answer to Interrogatory No. 4 above and Exhi-

(a) The type of asbestos used or processed.

(b) The quantities of each type of asbestos supplied by Cape Asbestos annually during the period 1946 to the present date.

(c) The means of packaging.

(d) The health warnings, if any, which accompanied each shipment of asbestos and indicate when said warnings were first made part of the shipments.

ANSWER: Defendant has no records indicating any purchases from Cape Asbestos, Ltd. However, it does show purchases from Cape Blue Mines (Pty.), Ltd. and will furnish those records if Plaintiff refers to Cape Blue Mines (Pty.), Ltd. rather than Cape Asbestos, Ltd.

6. Has defendant purchased asbestos from Egnet, Ltd., Republic of South Africa, which was used or processed at the Waukegan plant during the period 1946 to the present date? If answer is in the affirmative, state:

(a) The type of asbestos used or processed.

(b) The quantities of each type of asbestos supplied by Egnet, Ltd. annually during the period 1946 to the present date.

(c) The means of packaging.

(d) The health warnings, if any, which accompanied each shipment of asbestos and indicate when said warnings were first made part of the shipments.

ANSWER: Defendant has purchased fiber from the Egnet, Ltd. but it is unknown at the present time whether or not any of this fiber was utilized at the Waukegan plant. Defendant will continue to search its records and will supplement this Interrogatory accordingly.

(a)-(c) See Answer to Interrogatory No. 6 above and Exhibit E attached hereto for purchases made by Johns-Manville.

(d)-(e) Unknown.

Dated this _____ day of _____, 1978.

① Advocate Mines, Ltd.
Baie Verte
Newfoundland AOK 1B0, Canada

④ Asbestos Corporation, Ltd.

⑤ Asbestos Investment (Pty) Ltd.

⑥ Asbestos Pty. Ltd.

⑦ Atlas Asbestos Company
Box 805
Coalinga, CA 93210

⑧ Beith, John (S.A.) Pty. Ltd.

⑨ Bell Asbestos Mines, Ltd.
Thetford Mines
P. O. Box 99
Quebec, Canada

⑩ British Metal Corp.

⑪ Calaveras Asbestos Ltd.
P. O. Box 127
Copperopolis, CA 95228

(10) Cape Blue Mines (Pty) Ltd.
c/o North American Asbestos Corporation

(11) Cassiar Asbestos Corporation Ltd.
2000 Guinness Tower
1055 West Hastings Street
Vancouver, B.C., Canada V6E 3V3

(14) Central Asbestos Co., Ltd.
c/o Special Asbestos Co., Inc.

(15) Colonial Sugar Refining Co., Ltd.

(17) EGNEP, (Pty) Ltd.
22 Rissik Street
P. O. Box 8644
Johannesburg, So. Africa

(18) Flintkote Building Products Group
P. O. Box 151
Ravenna, OH 44266

(16) General Mining & Finance Corporation, Ltd.
c/o Special Materials, Inc.
3628 West Pierce Street
Milwaukee, Wisconsin 53215

(19) General Services Administration
United States Government
2000 "L" Street NW, Rm 602
Washington, DC 20036

Gibbs, Antony & Co., Ltd.

(10) Holt, John & Co.

(76) Hooker Chemical Company
345 Third Street
Niagara, NY 14302

(-1) Kurman

(77) Marlme Chrysotile Asbestos Corp., Ltd.

(-77) Metate Asbestos Corporation

(78) North American Asbestos Corporation
150 North Wacker Drive
Chicago, IL 60606

(79) Norca Corporation

(76) Pacific Asbestos Corporation

(77) Petrow, C. J. & Company

(-8) Porter, H. K., Company
Porter Building
601 Grant Street
Pittsburgh, PA 15219

(29) Raw Asbestos Distributors

(30) Rhodesian Asbestos, Ltd.

(31) S. A. Asbestos Trading (Pty) Ltd.
Everite House
20 Dekorte St.
P. O. Box 8163,
Johannesburg, So. Africa

(32) V/O Soyuspromexport (USSR)

(33) Special Asbestos Company, Inc.
2628 West Pierce Street
Milwaukee, Wisc. 53215

(34) Turner & Newell Ltd.

(35) Turners Asbestos Fibres, Ltd.

(36) Watson, Geach & Company, Inc.

VENDOR NAME

Cassiar Asbestos Corporation, Ltd.
2000 Guinness Tower
1055 West Hastings Street
Vancouver, B.C., Canada V6E 3V3

<u>YEAR</u>	<u>TYPE/GRADE FIBER</u>	<u>QUANTITY (TONS)</u>
1977	Cassiar A	180
	Cassiar AK	3,000
	Clinton CT	5,500
	Clinton CZ	2,000

VENDOR NAME

General Mining & Finance Corporation, Ltd.
c/o Special Materials, Inc.
3628 West Pierce Street
Milwaukee, Wisconsin 53215

<u>YEAR</u>	<u>TYPE/GRADE FIBER</u>	<u>QUANTITY (TONS)</u>
1976	FS Blue	10.8
	ML6 Blue	8,306
	L6 Blue	500
1977	ML6 Blue	3,306

VENDOR NAME

Egnep (Pty), Ltd.
22 Rissik St.
P.O. Box 8644
Johannesburg, South Africa

<u>YEAR</u>	<u>TYPE/GRADE FIBER</u>	<u>QUANTITY (TONS)</u>
1953	Amosite K-3	554
1953	Amosite M-D	1,418.9
1953	Amosite W-3	1,332.55
1953	Amosite D-3	928.5
1953	Amosite S-W	200
1954	Amosite D-3	1,500
1954	Amosite W-3	1,094
1954	Amosite D-11	750
1954	Amosite M-D	1,250
1955	Amosite M-D	1,400
1955	Amosite W-3	1,479
1955	Amosite D-11	950
1956	Amosite M-D	683.50
1956	Amosite W-3	1,255
1956	Amosite DCW	150
1957	Amosite DX	100
1957	Amosite MD	742
1957	Amosite D-3	750
1957	Amosite W-3	1,933
1958	Amosite MD	1,500
1958	Amosite W-3	2,500
1959	Amosite M-D	800
1959	Amosite W-3	3,900
1960	Amosite M-D	1,240
1960	Amosite W-3	2,650
1962	Amosite M-D	1,100
1962	Amosite W-3	1,950
1963	Amosite W-3	2,300
1963	Amosite MD	1,450
1964	Amosite W-3	1,800
1964	Amosite MD	1,080
1965	Amosite W-3	2,100
1965	Amosite D-11	240
1966	Amosite W-3, D-11	3,700
1967	Amosite W-3	2,530
1967	Amosite M	220
1967	Amosite D-11	360
1968	Amosite W-3	2,770
1968	Amosite M	640
1968	Amosite D-11	360

VENDOR NAME

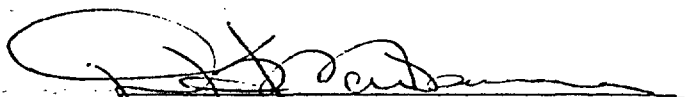
Eqnep (Pty), Ltd.

<u>YEAR</u>	<u>TYPE/GRADE FIBER</u>	<u>QUANTITY (TONS)</u>
1969	Amosite M	400
1969	Amosite D-11	360
1969	Amosite W-3	2,350
1970	Amosite M	169
1970	Amosite W-3	3,379
1970	Amosite D-11	450
1971	Amosite M	366
1971	Amosite W-3	2,498
1971	Amosite D-11	320
1974	S-11 Amosite	3,392
1975	S-11 Amosite	1.8
	S-11/65 Amosite	

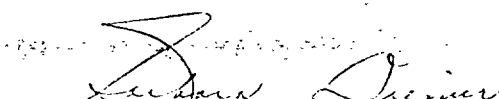
AFFIDAVIT

STATE OF COLORADO I
 I ss.
COUNTY OF JEFFERSON I

D. H. MARKUSSON, being duly sworn according to law,
deposes and says that he is Vice President of JOHNS-MANVILLE
SALES CORPORATION, a defendant in this action, that he is
authorized to make this affidavit on its behalf and that the
facts set forth in the foregoing pleading are true and cor-
rect to the best of his knowledge, information and belief.


D. H. MARKUSSON

Sworn and subscribed to before me this 9/24 day of July,
1978.


Notary Public

My Commission expires June 10, 1981