STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
WINNEBAGO COUNTY, ILLINOIS

PLAINTIFF'S EXHIBIT
SRS-24

RUSSELL BREMER and BARBARA BREMER,	)	
Plaintiffs.	)	
vs.	)	In Re: Asbestos Litigation
METROPOLITAN LIFE INSURANCE COMPANY, et al.	)	Case No. 01L133
Defendants.	)	

AFFIDAVIT

STATE OF NEW JERSEY)
) SS
COUNTY OF HUDSON)

Edward F. Norton, Jr., being duly sworn, deposes and says:

1. I am the Chairman of Norton & Sons, Inc.

2. I am a resident of Staten Island, New York, and my date of birth is June 29, 191[illegible]

3. I have been employed by Norton & Sons, Inc. since 1945.

4. Sears, Roebuck and Co. has been a customer of Norton & Sons during the entire period of time that I have been employed by Norton & Sons, Inc.

5. Norton & Sons was the manufacturer of the Joint Cement, Ready Mixed Joint Cement, Patching Plaster and Spackling Paste sold by Sears, Roebuck and Co.

6. During the course of my employment with Norton & Sons, I gained personal knowledge of the composition of the products listed above.

7. The products listed above never contained asbestos.

8. The documents entitled Sears Chemical Specialty Information, dated December 6, 1967 which bear my signature, set forth the formula of each of the above-referenced products and are attached hereto as Exhibits

Exhibit A:	Joint Cement
Exhibit B:	Ready Mixed Joint Cement
Exhibit C:	Patching Plaster
Exhibit D:	Spackling Paste

9. Based on my experience and personal knowledge, the documents attached hereto as Exhibits A through D set forth the formulas for the products manufactured by Norton & Sons, Inc. and sold by Sears, Roebuck and Co. during the time period at issue in this case, which I understand to be 1964 through 1979.

10. All of the information in this Affidavit is true and correct based upon my personal knowledge.

Edward F. Norton, Jr.

Subscribed and Sworn to before me on this 11 Day of October, 2001.

Notary Public

SEARS CHEMICAL SPECIALTY INFORMATION

DATE 12/6/67

X77

PRODUCT NAME Patching Plaster STOCK # 59302-5-9

DEPT. 630 BUYER H. L. Skinner MANUFACTURER Norton & Son, Inc.

MANUFACTURER'S ADDRESS 5928 South Garfield Avenue - Los Angeles, California
East Fifth Street & Hobart, Bayonne, N.J. PHONE 201 437-0770

PRODUCT CATEGORY	YES	OR NO
1) Highly Toxic (poison)	☐	☒
2) Toxic	☐	☒
3) Corrosive (poison)	☐	☒
4) Irritant	☐	☒
5) Strong Sensitizer	☐	☒

FLASHPOINT (TAG OPEN CUP) no °F

AEROSOLS:

FLASH BACK? YES ___ NO X

FLAME PROJECTION ___ INCHES

VISCOSITY ___ S.U.S.

Specify exact formula showing percentage of every ingredient by weight. Indicate hazardous ingredients with an asterisk (*).

Calcium Sulfate	49.97%
Calcium Carbonate	49.97%
Animal Bone Glue	0.06%
	100.00%

LIST ALL NECESSARY WARNING STATEMENTS AND ANTIDOTES REQUIRED ON THE LABEL UNDER THE FEDERAL HAZARDOUS SUBSTANCES ACT:

If this product requires special registration and/or labeling under Federal, State or City acts, laws, codes, etc., please specify and remit all pertinent data.

a. U. S. Dept. of Agriculture (Insecticide, Fungicide and Rodenticide Act) –

Yes ☐ No ☒ ; if yes, Registration # ___

Effective Date ___ to ___

b. N.Y. City Fire Dept. – Yes ☐ No ☒ ; If yes, C. of A. # ___

Date of Registration ___

Attach a notarized affidavit certifying flash point and, if an aerosol, an affidavit certifying that the container conforms to I.C.C. requirements.

c. Indiana – Yes ☐ No ☒. If yes, As Poison ☐ Hazardous Product ☐

or, Exemption ☐. Date of Registration ___

d. Federal Hazardous Substances Act – Yes ☐ No ☒

e. Other, such as Economic Poison Laws.

1. Please attach any independent laboratory test results.
2. Please attach four copies of present label (seven if an insecticide).

Packaging State size of containers 2-1/2 lb. 5 lb. and 25 lb.

State type of container used (glass bottle, tube, metal can, aerosol, etc.) and type of top or cap

Box

If packed in an aerosol or pressurized container state the propellant(s) used: ___

ROUTING (This portion to be filled out by Sears)

Buyer Approval ___

Date ___

Send entire file to D/817 – Chemical and Material Division

D/817 Approval ___

Date ___

Send file to D/733B – Trade Practice Division

It is agreeable with us to have Sears use the information we have supplied on Form F13387 for the purpose of registering products with federal, state or municipal agencies operating poison control centers or with a governmental agency to which product content information must be submitted by requirement of law.

SIGNATURE OF MANUFACTURER ___

Edward F. Norton, Jr.

PLACE OF BUSINESS 148 East Fifth Street - Bayonne, New Jersey 07002

F13387
D817 Parent

NS0005

SEARS CHEMICAL SPECIALTY INFORMATION DATE 12/8/67

PRODUCT NAME Spackling Paste X77 STOCK # 59331-2-4

DEPT. 630 BUYER H. L. Skinner MANUFACTURER Norton & Son, Inc.
5928 South Garfield Avenue - Los Angeles, California

MANUFACTURER'S ADDRESS East Fifth Street & Hobart, Bayonne, N.J. PHONE 201 437-0770

PRODUCT CATEGORY	YES	OR NO
1) Highly Toxic (poison)	☐	☒
2) Toxic	☐	☒
3) Corrosive (poison)	☐	☒
4) Irritant	☒	☐
5) Strong Sensitizer	☐	☒

FLASHPOINT (TAG OPEN CUP) no °F

AEROSOLS:
FLASH BACK? YES ___ NO X
FLAME PROJECTION ___ INCHES

VISCOSITY ___ S.U.S.

Specify exact formula showing percentage of every ingredient by weight. Indicate hazardous ingredients with an asterisk (*).

Vinyl-styrene-butadiene resin	5.8%
High Flash Naphtha	10.0%
Silica and Silicates	7.3%
Calcium Carbonate	60.5%
Methyl Cellulose	0.6%
Water	15.8%
	100.0%

LIST ALL NECESSARY WARNING STATEMENTS AND ANTIDOTES REQUIRED ON THE LABEL UNDER THE FEDERAL HAZARDOUS SUBSTANCES ACT:

If this product requires special registration and/or labeling under Federal, State or City acts, laws, codes, etc., please specify and remit all pertinent data.

a. U. S. Dept. of Agriculture (Insecticide, Fungicide and Rodenticide Act) –

Yes ☐ No ☒ ; if yes, Registration # ___

Effective Date ___ to ___

b. N.Y. City Fire Dept. – Yes ☐ No ☒ ; If yes, C. of A. # ___

Date of Registration ___

Attach a notarized affidavit certifying flash point and, if an aerosol, an affidavit certifying that the container conforms to I.C.C. requirements.

c. Indiana – Yes ☐ No ☒. If yes, As Poison ☐ Hazardous Product ☐

or, Exemption ☐ . Date of Registration ___

d. Federal Hazardous Substances Act – Yes ☐ No ☒

e. Other, such as Economic Poison Laws.

1. Please attach any independent laboratory test results.
2. Please attach four copies of present label (seven if an insecticide).

Packaging 4-1/2 oz. tube
State size of containers 1/2 pint - quar

State type of container used (glass bottle, tube metal can, aerosol, etc.) and type of top or cap
tube
metal cans Tripl-Tite top

If packed in an aerosol or pressurized container state the propellant(s) used: ___

ROUTING (This portion to be filled out by Sears)

Buyer Approval ___

Date ___

Send entire file to D/817 – Chemical and Material Division

D/817 Approval ___

Date ___

Send file to D/733B – Trade Practice Division

It is agreeable with us to have Sears use the information we have supplied on Form F13387 for the purpose of registering products with federal, state or municipal agencies operating poison control centers or with a governmental agency to which product content information must be submitted by requirement of law.

SIGNATURE OF MANUFACTURER E. F. Norton
Edward F. Norton, Jr.

PLACE OF BUSINESS 148 East Fifth Street - Bayonne, N. J.

F13387
D817 Parent

NS0006

SEARS CHEMICAL SPECIALTY [illegible]

PRODUCT NAME Joint Cement X77

DEPT. [illegible] BUYER H. L. Skinner MANUFACTURER [illegible]

MANUFACTURER'S ADDRESS 5928 South Garfield Avenue - Los Angeles, California
East Fifth Street & Hobart, Bayonne, N.J. PHONE [illegible]

PRODUCT CATEGORY	YES	OR NO
1) Highly Toxic (poison)	☐	☒
2) Toxic	☐	☒
3) Corrosive (poison)	☐	☒
4) Irritant	☐	☒
5) Strong Sensitizer	☐	☒

FLASHPOINT (TAG OPEN CUP) no °F

AEROSOLS:

FLASH BACK? YES ___ NO x

FLAME PROJECTION ___ INCHES

VISCOSITY ___ S.U.S.

Specify exact formula showing percentage of every ingredient by weight.
Indicate hazardous ingredients with an asterisk (*).

Calcium Carbonate	70.6%
Silica and Silicates	22.5%
Urea	0.2%
*Ammonium Oxalate	0.2%
Sodium Alginate	0.3%
*Sodium Pentachlorphenate	0.2%
Soya Flour	4.2%
Casein	1.8%
	100.0%

LIST ALL NECESSARY WARNING STATEMENTS AND ANTIDOTES REQUIRED ON THE LABEL UNDER THE FEDER HAZARDOUS SUBSTANCES ACT:

ADHESIVES - CEMENT

If this product requires special registration and/or labeling under Federal, State or City acts, laws, codes, etc., please specify and remit all pertinent data.

a. U. S. Dept. of Agriculture (Insecticide, Fungicide and Rodenticide Act) –

Yes ☐ No ☒; if yes, Registration # ___

Effective Date ___ to ___

b. N.Y. City Fire Dept. – Yes ☐ No ☒; If yes, C. of A. # ___

Date of Registration ___

Attach a notarized affidavit certifying flash point and, if an aerosol, an affidavit certifying that the container conforms to I.C.C. requirements.

c. Indiana – Yes ☐ No ☒. If yes, As Poison ☐ Hazardous Product ☐

or, Exemption ☐. Date of Registration ___

d. Federal Hazardous Substances Act – Yes ☐ No ☒

e. Other, such as Economic Poison Laws.

1. Please attach any independent laboratory test results.
2. Please attach four copies of present label (seven if an insecticide).

Packaging
State size of containers 5# and 15#

State type of container used (glass bottle [illegible] metal can, aerosol, etc.) and type of top or

Box

If packed in an aerosol or pressurized conta

state the propellant(s) used: ___

ROUTING (This portion to be filled out by Sear

Buyer Approval ___

Date ___

Send entire file to D/817 – Chemical and M rial Division

D/817 Approval ___

Date ___

Send file to D/733B – Trade Practice Div.

It is agreeable with us to have Sears use the information we have supplied on Form F13387 for the purpose of registering products with federal, state or municipal agencies operating poison control centers or with a governmental agency to which product content information must be submitted by requirement of law.

SIGNATURE OF MANUFACTURER Edward F. Norton, Jr.

PLACE OF BUSINESS 148 East Fifth Street - Bayonne, New Jersey

F13387
D817 Parent

NS0007

PRODUCT NAME [illegible]

DEPT. [illegible] BUYER [illegible]

MANUFACTURER'S ADDRESS 5928 South Garfield Avenue - Los Angeles, California
East Fifth Street & Hobart, Bayonne, [illegible] PHONE [illegible]

PRODUCT CATEGORY	YES	OR NO
1) Highly Toxic (poison)	☐	☒
2) Toxic	☐	☒
3) Corrosive (poison)	☐	☒
4) Irritant	☐	☒
5) Strong Sensitizer	☐	☒

FLASHPOINT (TAG OPEN CUP) no °F

AEROSOLS:

FLASH BACK? YES ___ NO X

FLAME PROJECTION ___ INCHES

VISCOSITY ___ S.U.S.

Specify exact formula showing percentage of each ingredient by weight. Indicate hazardous ingredients with an asterisk *

Vinyl Acrylic resin	3.2%
*Dibutyl Phthalate	0.4%
Silica and Silicates	31.9%
Propylene Glycol	2.9%
Calcium Carbonate	25.5%
*Ethylene diglycol ether	0.6%
Water	35.5%
	100.0%

LIST ALL NECESSARY WARNING STATEMENTS AND ANTIDOTES REQUIRED ON THE LABEL UNDER THE FED. HAZARDOUS SUBSTANCES ACT:

1981
201-437-[illegible]
Tim Norton

ADHESIVE - CEMENT

If this product requires special registration and/or labeling under Federal, State or City acts, laws, codes, etc., please specify and remit all pertinent data.

a. U. S. Dept. of Agriculture (Insecticide, Fungicide and Rodenticide Act) –

Yes ☐ No ☒; if yes, Registration # ___

Effective Date ___ to ___

b. N.Y. City Fire Dept. – Yes ☐ No ☒; If yes, C. of A. # ___

Date of Registration ___

Attach a notarized affidavit certifying flash point and, if an aerosol, an affidavit certifying that the container conforms to I.C.C. requirements.

c. Indiana – Yes ☐ No ☒. If yes, As Poison ☐ Hazardous Product ☐

or, Exemption ☐. Date of Registration ___

d. Federal Hazardous Substances Act – Yes ☐ No ☒

e. Other, such as Economic Poison Laws.

1. Please attach any independent laboratory test results.
2. Please attach four copies of present label (seven if an insecticide).

Packaging

State size of containers Gallon

State type of container used (glass bottle, metal can, aerosol, etc.) and type of top

Metal can Tripl-Tite top

If packed in an aerosol or pressurized con

state the propellant(s) used: ___

ROUTING (This portion to be filled out by Se

Buyer Approval ___

Date ___

Send entire file to D 817 – Chemical and [illegible] rial Division

D/817 Approval ___

Date ___

Send file to D 733B – Trade Practice Di[illegible]

It is agreeable with us to have Sears use the information we have supplied on Form-F13387 for the purpose of registering products with federal, state or municipal agencies operating poison control centers or with a governmental agency to which product content information must be submitted by requirement of law.

SIGNATURE OF MANUFACTURER ___ Edward F. Norton, Jr.

PLACE OF BUSINESS 148 East Fifth Street - Bayonne, New Jersey 07002

F13387
D817 Parent

NS0008