FILE NAME: Goodyear (GY)

DATE: 0000

DOC#: GY084

DOCUMENT DESCRIPTION: Answers to Plaintiff's First Set of Request for Admission to Defendant, Goodyear

IN THE COURT OF COMMON PLEAS
OF SUMMIT COUNTY, OHIO

WILLIAM F. CLARK, et al.	)	CASE NO. ACV 94 04 1107
	)	
Plaintiffs	)	JUDGE WILLIAM H. VICTOR
	)	
-vs-	)	**ANSWERS TO PLAINTIFF'S FIRST SET OF REQUEST FOR ADMISSIONS TO DEFENDANT, GOODYEAR TIRE & RUBBER COMPANY**
	)	
OWENS-CORNING FIBERGLAS CORP., et al.	)	
Defendants	)	
	)	

Plaintiffs, WILLIAM F. CLARK, et al., request Defendant, Goodyear Tire & Rubber Company, within thirty-two (32) days after service of this request, to make the following admissions for the purpose of this action only and subject to all pertinent objections to admissibility which may be interposed at trial. Each of the following Requests for Admissions refers to the Goodyear Tire & Rubber Company's Akron facilities only, and, when applicable refers to asbestos, talc/soapstone, or asbestos-containing products used in its Akron facilities.

Admit that each of the following statements is true:

1. That all persons that work in a rubber factory are exposed

58. That Olen Lee was never provided a respirator while employed at Goodyear Tire & Rubber Company.

Response:

For want of knowledge, denied. Goodyear has no present means of determining the truth or falsity.

59. That John Nardella was never provided a respirator while employed at Goodyear Tire & Rubber Company.

Response:

Denied for want of knowledge. Goodyear has not inquired of this Plaintiff, since it is now prohibited from so doing.

60. That Goodyear Tire & Rubber Company was aware of the dangers to humans of exposure to airborne asbestos fibers prior to:

a. 1983;

Response:

Admitted.

b. 1982;

Response:

Admitted.

c. 1981;

Response:

Admitted.

d. 1980;

Response:

Admitted.

e. 1979;

Response:

Admitted.

f. 1978;

Response:

Admitted.

g. 1977;

Response:

Admitted.

h. 1976;

Response:

Admitted.

i. 1975;

Response:

Admitted.

j. 1974;

Response:

Admitted.

k. 1973;

Response:

Admitted.

l. 1972;

Response:

Denied.

m. 1971;

Response:

Denied.

n. 1970;

Response:

Denied.

o. 1969;

Response:

Denied.

p. 1968;

Response:

Denied.

q. 1967;

Response:

Denied.

r. 1966;

Response:

Denied.

s. 1965;

Response:

Denied.

t. 1964;

Response:

Denied.

u. 1963;

Response:

Denied.

v. 1962;

Response:

Denied.

w. 1961;

Response:

Denied.

x. 1960;

Response:

Denied.

y. 1959;

Response:

Denied.

z. 1958;

Response:

Denied.

aa. 1957;

Response:

Denied.

bb. 1956;

Response:

Denied.

cc. 1955;

Response:

Denied.

dd. 1954;

Response:

Denied.

ee. 1953;

Response:

Denied.

ff. 1952;

Response:

Denied.

gg. 1951;

Response:

Denied.

hh. 1950;

Response:

Denied.

ii. 1949;

Response:

Denied.

jj. 1948;

Response:

Denied.

kk. 1947;

Response:

Denied.

ll. 1946;

Response:

Denied.

mm. 1945;

Response:

Denied.

nn. 1944;

Response:

Denied.

oo. 1943;

Response:

Denied.

61. That Goodyear Tire & Rubber Company was aware that some of its employees were exposed to asbestos fibers in the work environment at its Akron facilities prior to:

a. 1983;

Response:

Admitted.

b. 1982;

Response:

Admitted.

c. 1981;

Response:

Admitted.

d. 1980;

Response:

Admitted.

e. 1979;

Response:

Admitted.

f. 1978;

Response:

Admitted.

g. 1977;

Response:

Admitted.

h. 1976;

Response:

Admitted.

i. 1975;

Response:

Admitted.

j. 1974;

Response:

Admitted.

k. 1973;

Response:

Admitted.

l. 1972;

Response:

Admitted.

m. 1971;

Response:

Admitted.

n. 1970;

Response:

Admitted.

o. 1969;

Response:

Admitted.

p. 1968;

Response:

Admitted.

q. 1967;

Response:

Admitted.

r. 1966;

Response:

Admitted.

s. 1965;

Response:

Admitted.

t. 1964;

Response:

Admitted.

u. 1963;

Response:

Admitted.

v. 1962;

Response:

Admitted.

w. 1961;

Response:

Admitted.

x. 1960;

Response:

Admitted.

y. 1959;

Response:

Admitted.

z. 1958;

Response:

Admitted.

aa. 1957;

Response:

Admitted.

bb. 1956;

Response:

Admitted.

cc. 1955;

Response:

Admitted.

dd. 1954;

Response:

Admitted.

ee. 1953;

Response:

Admitted.

ff. 1952;

Response:

Admitted.

gg. 1951;

Response:

Admitted.

hh. 1950;

Response:

Admitted.

ii. 1949;

Response:

Admitted.

jj. 1948;

Response:

Admitted.

kk. 1947;

Response:

Admitted.

ll. 1946;

Response:

Admitted.

mm. 1945;

Response:

Admitted.

144. That asbestos is recognized by the United Stat Department of Environmental Production Agency (EPA) as a primary carcinogen to humans.

Response:

Objection. Public information is as readily available to Plaintiffs as to this Defendant.

Respectfully submitted,

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