

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

In Re: Newport News Circuit Asbestos Cases

At Law No. 10000C-03

At Law No. 10000W-01

**Marie Ferguson Alexander, Executrix of the Estate
of Glen W. Alexander, Deceased**

v.

At Law No. 25650C-03

Owens-Corning Fiberglas Corp., et al.;

Robert Dent

v.

At Law No. 26865W-01

Owens-Corning Fiberglas Corp., et al.;

**Eva Carolyn Boone, Executrix
of the Estate of William R. Boone, Sr.**

v.

At Law No. 25916C-03

C.E. Thurston & Sons, Inc., et al.

Defendants.



**GAF CORPORATION'S RESPONSE TO
PLAINTIFFS' REQUEST FOR ADMISSIONS
RE: GAF CORPORATION**

GAF Corporation ("GAF"), by its counsel, in response to Plaintiffs' Request for Admissions (the "Request"), states as follows:

PRELIMINARY STATEMENT

American I.G. Corporation was incorporated in Delaware in 1929 and changed its name to General Aniline & Film Corporation in 1939. In 1942, approximately 98% of General Aniline & Film Corporation's stock was seized by the U.S. Treasury Department which then assumed control over the company's management and operations. In 1965, the U.S. Government

relinquished control and General Aniline & Film Corporation's company stock was sold at public auction.

Prior to 1967, General Aniline & Film Corporation was engaged in the development, manufacture and sale of photographic and chemical products. It was never involved in the manufacture of any asbestos-containing products.

In May 1967, General Aniline & Film Corporation acquired, by merger, The Ruberoid Co. The Ruberoid Co. was engaged in the manufacture of various asbestos-containing products.

In April 1968, General Aniline & Film Corporation changed its name to GAF Corporation. That corporation was liquidated and dissolved in April 1989.

In connection with its liquidation, GAF Corporation conveyed, among other things, all the assets and liabilities of its former asbestos producing operations, to a new company by the name of GAF Building Materials Corporation, which had been incorporated in 1987 in Delaware under the name of Edgecliff Corporation.¹

The defendant herein, GAF Corporation, was originally incorporated in 1987 in Delaware as Newco Holdings Corporation. It is now the indirect corporate parent of GAF Building Materials Corporation. Although it is a holding company with no operations, GAF Corporation has, to avoid the time and expense of motion practice, customarily defended asbestos bodily injury lawsuits in its own name as if those lawsuits were brought against GAF Building Materials Corporation.

¹ For the sake of completeness, it should be noted that a prior company named GAF Building Materials Corporation was incorporated in 1986 and merged with GAF Corporation prior to GAF Corporation's dissolution in April 1989.

GENERAL OBJECTIONS

1. GAF objects to these Requests on the grounds that they are excessive in number and scope and are burdensome and overly broad.

2. GAF objects to Plaintiff's Requests for Admission to the extent they seek admissions which are irrelevant to the subject matter of this action, and GAF, by responding to this Request, does not waive that objection, and specifically reserves the right to object at trial to the admissibility of any admission made herein.

3. Each of the following Responses is made subject to and without waiving these general objections and limitations set forth above and are applicable to each of the numbered requests set out below, and these objections and limitations are hereby incorporated by reference in each response to the Requests.

GAF-RFA-1. Admit that GAF Corporation was incorporated in Delaware in 1929 as American I. G. Corporation.

GAF'S RESPONSE TO RFA-1:

Admitted that American I.G. Corporation was incorporated in Delaware in 1929. In 1939, it changed its name to General Aniline & Film Corporation. It changed its name to GAF Corporation in 1968.

GAF-RFA-2. Admit that in 1929 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-3. Admit that in 1930 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-4. Admit that in 1931 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-5. Admit that in 1932 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-6. Admit that in 1933 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-7. Admit that in 1934 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-8. Admit that in 1935 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-9. Admit that in 1936 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-10. Admit that in 1937 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-11. Admit that in 1938 American I. G. Corporation was owned by the German company I. G. Farben.

GAF-RFA-12. Admit that in 1939 American I. G. Corporation was owned by the German company I. G. Farben.

GAF'S RESPONSE TO RFA 2-12:

GAF admits that American I.G. Corporation was owned by a German company. GAF does not have documents that the company was specifically I.G. Farben. However, GAF will not dispute this ownership at trial.

GAF-RFA-13. Admit that in 1939 American I. G. Corporation changed its name to General Aniline & Film Corporation.

GAF'S RESPONSE TO RFA 13:

Admitted.

GAF-RFA-14. Admit that in 1940 General Aniline & Film Corporation was owned by the German company I.G. Farben.

GAF-RFA-15. Admit that in 1941 General Aniline & Film Corporation was owned by the German company I. G. Farben.

GAF'S RESPONSE TO RFA 14-15:

See response to RFA 2-12. In addition, WWII was engulfing Europe. The German company's name may have changed.

GAF-RFA-16. Admit that in 1942 General Aniline & Film Corporation was owned by the German company I. G. Farben.

GAF-RFA-17. Admit that in 1943 General Aniline & Film Corporation was owned by the German company I. G. Farben.

GAF-RFA-18. Admit that in 1944 General Aniline & Film Corporation was owned by the German company I. G. Farben.

GAF-RFA-19. Admit that in 1945 General Aniline & Film Corporation was owned by the German company I. G. Farben.

GAF'S RESPONSE TO RFA 16-19:

Denied. The U.S. Treasury Department seized 98% of the stock in 1942 and took control of operations and management until 1965.

GAF-RFA-20. Admit that in 1967 General Aniline & Film Corporation merged with The Ruberoid Co.

GAF'S RESPONSE TO RFA 20:

Admitted.

GAF-RFA-21. Admit that pursuant to the 1967 merger of General Aniline & Film Company and The Ruberoid Co., General Aniline & Film Company assumed The Ruberoid Co.'s assets and liabilities.

GAF'S RESPONSE TO RFA 21:

Admitted that General Aniline & Film Company merged with The Ruberoid Co. in 1967;

GAF specifically objects to this Request to the extent that it seeks a further response concerning the legal effect of such merger on grounds that such Request is not the proper subject of a Request for Admission.

GAF-RFA-22. Admit that in 1968 General Aniline & Film Corporation changed its name to GAF Corporation.

GAF'S RESPONSE TO RFA 22:

Admitted.

GAF-RFA-23. Admit that in 1921 The Ruberoid Co. was incorporated in New Jersey.

GAF'S RESPONSE TO RFA 23:

Admitted that Standard Paint Company, originally incorporated in New Jersey in 1905, changed its name to The Ruberoid Co. in 1921. All other allegations are denied.

GAF-RFA-24. Admit that in 1928 The Ruberoid Co. acquired the H. F. Watson Company.

GAF'S RESPONSE TO RFA 24:

Admitted.

GAF-RFA-25. Admit that with the acquisition of the H. F. Watson Company in 1928, The Ruberoid Co. began the manufacture of thermal insulation products containing asbestos.

GAF'S RESPONSE TO RFA 25:

Admitted.

GAF-RFA-26. Admit that in 1930 The Ruberoid Co. acquired Eternit Inc.

GAF'S RESPONSE TO RFA 26:

Admitted that in 1932 The Ruberoid Co. acquired Eternit Inc.

GAF-RFA-27. Admit that Eternit Inc. was an asbestos cement product manufacturer when acquired by The Ruberoid Co. in 1930.

GAF'S RESPONSE TO RFA 27:

Admitted that Eternit Inc. was an asbestos manufacturer of cement products when acquired by The Ruberoid Co.

GAF-RFA-28. Admit that in 1936 The Ruberoid Co. purchased Vermont Asbestos Mines.

GAF'S RESPONSE TO RFA 28:

Admitted that The Ruberoid Co. purchased an asbestos mine located in Vermont by acquiring the assets of the Vermont Asbestos Corp. in 1936.

GAF-RFA-29. Admit that in 1936 when The Ruberoid Co. purchased Vermont Asbestos Mines, Vermont Asbestos Mines was the largest producer of asbestos fiber in the United States.

GAF'S RESPONSE TO RFA 29:

Admitted that in 1936 the asbestos mine purchased by acquiring the assets of the Vermont Asbestos Corp., was the largest producer of asbestos fiber in the United States.

GAF-RFA-30. Admit that in 1936 after The Ruberoid Co. purchased Vermont Asbestos Mines, The Ruberoid Co. became the largest producer of asbestos fiber in the United States.

GAF'S RESPONSE TO RFA 30:

Admitted that in 1936 after The Ruberoid Co. purchased an asbestos mine by acquiring the assets of the Vermont Asbestos Corp., the mine became the largest producer of asbestos fiber in the United States.

GAF-RFA-31. Admit that after it bought the Vermont Asbestos Mines in 1936, The Ruberoid Co. expanded to at least ten plants manufacturing asbestos-containing products.

GAF'S RESPONSE TO RFA 31:

Admitted that after Ruberoid bought an asbestos mine by acquiring the assets of the Vermont Asbestos Corp., The Ruberoid Co. expanded to at least ten plants manufacturing asbestos-containing products in subsequent years.

GAF-RFA-32. Admit that in 1937 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-33. Admit that in 1938 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-34. Admit that in 1939 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-35. Admit that in 1940 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-36. Admit that in 1941 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-37. Admit that in 1942 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-38. Admit that in 1943 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-39. Admit that in 1944 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-40. Admit that in 1945 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-41. Admit that in 1946 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-42. Admit that in 1947 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-43. Admit that in 1948 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-44. Admit that in 1949 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-45. Admit that in 1950 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-46. Admit that in 1951 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-47. Admit that in 1952 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-48. Admit that in 1953 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-49. Admit that in 1954 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-50. Admit that in 1955 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-51. Admit that in 1956 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-52. Admit that in 1957 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-53. Admit that in 1958 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-54. Admit that in 1959 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-55. Admit that in 1960 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-56. Admit that in 1961 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-57. Admit that in 1962 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-58. Admit that in 1963 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-59. Admit that in 1964 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-60. Admit that in 1965 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-61. Admit that in 1966 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF-RFA-62. Admit that in 1967 The Ruberoid Co. was the largest producer of asbestos fiber in the United States.

GAF'S RESPONSE TO RFA 32-62:

Admitted that in 1936, and for some years thereafter, the asbestos mine purchased by The Ruberoid Co. in 1936 was the largest such mine in the United States. After making

reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny the remainder of these Requests.

GAF-RFA-63. Admit that in 1965 The Ruberoid Co. acquired vinyl asbestos distributors Mastic Tile and Sandura.

GAF'S RESPONSE TO RFA 63:

Admitted that the Ruberoid Co. acquired Mastic Tile Corporation of American in 1959 and acquired Sandura in 1965.

GAF-RFA-64. Admit that in 1967 after General Aniline & Film Corporation merged with The Ruberoid Co., General Aniline & Film Corporation was the largest producer of asbestos fiber in the United States.

GAF'S RESPONSE TO RFA 64:

Admitted that General Aniline & Film Corporation merged with The Ruberoid Co. in 1967; after making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-65. Admit that in 1967 General Aniline & Film Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-66. Admit that in 1968 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-67. Admit that in 1969 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-68. Admit that in 1970 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-69. Admit that in 1971 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-70. Admit that in 1972 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-71. Admit that in 1973 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-72. Admit that in 1974 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-73. Admit that in 1975 GAF Corporation was the largest producer of asbestos fiber in the United States.

GAF'S RESPONSE TO RFA 64-73:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny these Requests with respect to whether The Ruberoid Co. and General Aniline & Film Corporation was the largest producer of asbestos fiber in the United States.

GAF-RFA-74. Admit that in 1975 GAF Corporation sold its Vermont Asbestos Mines to its employees.

GAF'S RESPONSE TO RFA 74:

GAF admits that General Aniline & Film Corporation sold the asbestos mine located in Vermont to its former employees in 1975. GAF denies the remainder of this Request.

GAF-RFA-75. Admit that GAF Corporation has no documents that demonstrate that GAF Corporation warned the purchasers of its Vermont Asbestos Mines of the health hazards associated with the exposure of human beings to asbestos.

GAF'S RESPONSE TO RFA 75:

Denied.

GAF-RFA-76. Admit that GAF did not cease producing asbestos-containing products until 1981.

GAF'S RESPONSE TO RFA 76:

Admitted.

GAF-RFA-77. Admit that GAF Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 77:

Denied.

GAF-RFA-78. Admit that GAF Corporation never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 78:

Denied.

GAF-RFA-79. Admit that GAF Building Materials Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 79:

GAF Building Materials Corporation never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that GAF Building Materials Corporation did produce asbestos or asbestos-containing products.

GAF-RFA-80. Admit that GAF Building Materials Corporation never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 80:

GAF Building Materials Corporation never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that GAF Building Materials Corporation did produce asbestos or asbestos-containing products.

GAF-RFA-81. Admit that I.G. Farben never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 81:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-82. Admit that I. G. Farben never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 82:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-83. Admit that American I.G. Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 83:

American I.G. Corporation never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that American I. G. Corporation did produce asbestos or asbestos-containing products.

GAF-RFA-84. Admit that American I.G. Corporation never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 84:

American I. G. Corporation never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that American I. G. Corporation did produce asbestos or asbestos-containing products.

GAF-RFA-85. Admit that General Aniline & Film Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 85:

Denied.

GAF-RFA-86. Admit that General Aniline & Film Corporation never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 86:

Denied.

GAF-RFA-87. Admit that Standard Paint Company never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 87:

Standard Paint Company never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that Standard Paint Company did produce asbestos or asbestos-containing products.

GAF-RFA-88. Admit that Standard Paint Company never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 88:

Standard Paint Company never produced any asbestos or asbestos-containing products, therefore this Request is objectionable on the grounds that it is misleading in that it suggests, by its phrasing, that Standard Paint Company did produce asbestos or asbestos-containing products.

GAF-RFA-89. Admit that The Ruberoid Co. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 89:

Denied.

GAF-RFA-90. Admit that The Ruberoid Co. never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 90:

Denied.

GAF-RFA-91. Admit that H. F. Watson Co. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 91:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request. It is believed that TLVs for asbestos were not in existence in 1928 and years prior. Companies cannot rely on TLVs that do not exist.

GAF-RFA-92. Admit that H. F. Watson Co. never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 92:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request. It is believed that TLVs for asbestos were not in existence in 1928 and years prior. Companies cannot rely on TLVs that do not exist.

GAF-RFA-93. Admit that Eternit Inc. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 93:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request. It is believed that TLVs for asbestos were not in existence in 1928 and years prior. Companies cannot rely on TLVs that do not exist.

GAF-RFA-94. Admit that Eternit Inc. never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 94:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request. It is believed that TLVs for asbestos were not in existence in 1928 and years prior. Companies cannot rely on TLVs that do not exist.

GAF-RFA-95. Admit that Vermont Asbestos Mines never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 95:

Denied that Ruberoid, which owned the mines in Vermont never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-96. Admit that Vermont Asbestos Mines never relied on threshold limit values (TLV) to determine if the quantity of airborne asbestos dust and fibers was safe.

GAF'S RESPONSE TO RFA 96:

Denied. See answer to RFA 95.

GAF-RFA-97. Admit that GAF Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 97:

Denied.

GAF-RFA-98. Admit that GAF Building Materials Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-99. Admit that I.G. Farben never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-100. Admit that American I.G. Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-101. Admit that General Aniline & Film Corporation never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-102. Admit that Standard Paint Company never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-103. Admit that The Ruberoid Co. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-104. Admit that H. F. Watson Co. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-105. Admit that Eternit Inc. never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF-RFA-106. Admit that Vermont Asbestos Mines never tested for the quantity of airborne asbestos dust and/or fibers in its plants and/or facilities and/or mines.

GAF'S RESPONSE TO RFA 98-106:

GAF specifically objects to these Requests on the grounds these Requests are identical to and, therefore, redundant of, Requests for Admission Nos. 79, 81, 83, 85, 87, 91, 93 and 95, and GAF refers to its responses to those Requests and incorporates them herein by reference.

GAF-RFA-107. Admit that GAF Corporation was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 107:

Admitted that GAF was a member of NIMA from 1968 to 1971; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading in that it fails to specify a time period.

GAF-RFA-108. Admit that GAF Corporation was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 108:

Admitted that GAF was a member of TIMA from 1973 to approximately 1978; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading in that it fails to specify a time period.

GAF-RFA-109. Admit that GAF Corporation was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 109:

Denied.

GAF-RFA-110. Admit that GAF Corporation was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 110:

Denied.

GAF-RFA-111. Admit that GAF Corporation was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 111:

Denied.

GAF-RFA-112. Admit that GAF Corporation was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 112:

Denied.

GAF-RFA-113. Admit that GAF Corporation was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 113:

Admitted as to 1968 to 1971; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-114. Admit that GAF Corporation was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 114:

Denied.

GAF-RFA-115. Admit that GAF Corporation was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 115:

Admitted as to 1971 to 1977; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-116. Admit that GAF Corporation was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 116:

Admitted as to 1970s to 1981; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-117. Admit that GAF Corporation was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 117:

Admitted as to 1968 to 1970s; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-118. Admit that GAF Corporation was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 118:

Admitted as to 1968 to 1981; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-119. Admit that GAF Corporation was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 119:

Admitted as to 1968 to 1969; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-120. Admit that GAF Corporation was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 120:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-121. Admit that GAF Corporation was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 121:

Admitted as to 1968-1981; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-122. Admit that GAF Corporation was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 122:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-123. Admit that GAF Corporation was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 123:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-124. Admit that GAF Corporation was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 124:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-125. Admit that GAF Building Materials Corporation was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 125:

Denied.

GAF-RFA-126. Admit that GAF Building Materials Corporation was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 126:

Denied.

GAF-RFA-127. Admit that GAF Building Materials Corporation was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 127:

Denied.

GAF-RFA-128. Admit that GAF Building Materials Corporation was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 128:

Denied.

GAF-RFA-129. Admit that GAF Building Materials Corporation was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 129:

Denied.

GAF-RFA-130. Admit that GAF Building Materials Corporation was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 130:

Denied.

GAF-RFA-131. Admit that GAF Building Materials Corporation was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 131:

Denied.

GAF-RFA-132. Admit that GAF Building Materials Corporation was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 132:

Denied.

GAF-RFA-133. Admit that GAF Building Materials Corporation was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 133:

Denied.

GAF-RFA-134. Admit that GAF Building Materials Corporation was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 134:

Denied.

GAF-RFA-135. Admit that GAF Building Materials Corporation was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 135:

Denied.

GAF-RFA-136. Admit that GAF Building Materials Corporation was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 136:

Denied.

GAF-RFA-137. Admit that GAF Building Materials Corporation was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 137:

Denied.

GAF-RFA-138. Admit that GAF Building Materials Corporation was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 138:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-139. Admit that GAF Building Materials Corporation was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 139:

Denied.

GAF-RFA-140. Admit that GAF Building Materials Corporation was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 140:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-141. Admit that GAF Building Materials Corporation was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 141:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-142. Admit that GAF Building Materials Corporation was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 142:

Denied.

GAF-RFA-143. Admit that I. G. Farben was a member of the National Insulation Manufacturers Association (NIMA).

GAF-RFA-144. Admit that I. G. Farben was a member of the National Insulation Manufacturers Association (TIMA).

GAF-RFA-145. Admit that I. G. Farben was a member of the Industrial Health Foundation (IHF).

GAF-RFA-146. Admit that I. G. Farben was a member of the Air Hygiene Foundation of America, Inc.

GAF-RFA-147. Admit that I. G. Farben was a member of the Asbestos Textile Institute.

GAF-RFA-148. Admit that I. G. Farben was a member of the Mineral Fiber Products Bureau.

GAF-RFA-149. Admit that I. G. Farben was a member of the Asbestos Cement Product Association.

GAF-RFA-150. Admit that I. G. Farben was a member of the Quebec Asbestos Mining Association.

GAF-RFA-151. Admit that I. G. Farben was a member of the Asbestos Information/NA.

GAF-RFA-152. Admit that I. G. Farben was a member of the Resilient Floor Covering Institute.

GAF-RFA-153. Admit that I. G. Farben was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF-RFA-154. Admit that I. G. Farben was a member of the American Society of Testing Materials.

GAF-RFA-155. Admit that I. G. Farben was a member of the Gypsum Association.

GAF-RFA-156. Admit that I. G. Farben was a member of the National Industrial Conference Board.

GAF-RFA-157. Admit that I. G. Farben was a member of the National Safety Council.

GAF-RFA-158. Admit that I. G. Farben was a member of the Air Pollution Control Association.

GAF-RFA-159. Admit that I. G. Farben was a member of the Water Pollution Control Association.

GAF-RFA-160. Admit that I. G. Farben was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 143-160:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny these Requests.

GAF-RFA-161. Admit that American I. G. Corporation was a member of the National Insulation Manufacturers Association (NIMA).

GAF-RFA-162. Admit that American I. G. Corporation was a member of the National Insulation Manufacturers Association (TIMA).

GAF-RFA-163. Admit that American I. G. Corporation was a member of the Industrial Health Foundation (IHF).

GAF-RFA-164. Admit that American I. G. Corporation was a member of the Air Hygiene Foundation of America, Inc.

GAF-RFA-165. Admit that American I. G. Corporation was a member of the Asbestos Textile Institute.

GAF-RFA-166. Admit that American I. G. Corporation was a member of the Mineral Fiber Products Bureau.

GAF-RFA-167. Admit that American I. G. Corporation was a member of the Asbestos Cement Product Association.

GAF-RFA-168. Admit that American I. G. Corporation was a member of the Quebec Asbestos Mining Association.

GAF-RFA-169. Admit that American I. G. Corporation was a member of the Asbestos Information/NA.

GAF-RFA-170. Admit that American I. G. Corporation was a member of the Resilient Floor Covering Institute.

GAF-RFA-171. Admit that American I. G. Corporation was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 161-171:

Denied.

GAF-RFA-172. Admit that American I. G. Corporation was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 172:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-173. Admit that American I. G. Corporation was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 173:

Denied.

GAF-RFA-174. Admit that American I. G. Corporation was a member of the National Industrial Conference Board.

GAF-RFA-175. Admit that American I. G. Corporation was a member of the National Safety Council.

GAF-RFA-176. Admit that American I. G. Corporation was a member of the Air Pollution Control Association.

GAF-RFA-177. Admit that American I. G. Corporation was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 174-177:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-178. Admit that American I. G. Corporation was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 178:

Denied.

GAF-RFA-179. Admit that General Aniline & Film Corporation was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 179:

GAF admits that General Aniline & Film Corporation was a member of NIMA from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-180. Admit that General Aniline & Film Corporation was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 180:

Denied.

GAF-RFA-181. Admit that General Aniline & Film Corporation was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 181:

Denied.

GAF-RFA-182. Admit that General Aniline & Film Corporation was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 182:

GAF admits that General Aniline & Film Corporation was a member of the Air Hygiene Foundation of American, Inc. only as to the years 1945-47; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-183. Admit that General Aniline & Film Corporation was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 183:

Denied.

GAF-RFA-184. Admit that General Aniline & Film Corporation was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 184:

GAF admits that General Aniline & Film Corporation was a member of the Mineral Fiber Products Bureau from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-185. Admit that General Aniline & Film Corporation was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 185:

Denied.

GAF-RFA-186. Admit that General Aniline & Film Corporation was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 186:

Denied.

GAF-RFA-187. Admit that General Aniline & Film Corporation was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 187:

Denied.

GAF-RFA-188. Admit that General Aniline & Film Corporation was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 188:

Denied.

GAF-RFA-189. Admit that General Aniline & Film Corporation was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 189:

GAF admits that General Aniline & Film Corporation was a member of the Asphalt and Vinyl Asbestos Tile Institute from 1967 to 1986; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-190. Admit that General Aniline & Film Corporation was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 190:

GAF admits that General Aniline & Film Corporation was a member of the American Society of Testing Materials from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-191. Admit that General Aniline & Film Corporation was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 191:

GAF admits that General Aniline & Film Corporation was a member of the Gypsum Association from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-192. Admit that General Aniline & Film Corporation was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 192:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-193. Admit that General Aniline & Film Corporation was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 193:

GAF admits that General Aniline & Film Corporation was a member of the National Safety Council from 1966 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-194. Admit that General Aniline & Film Corporation was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 194:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-195. Admit that General Aniline & Film Corporation was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 195:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-196. Admit that General Aniline & Film Corporation was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 196:

Denied.

GAF-RFA-197. Admit that Standard Paint Company was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 197:

Denied.

GAF-RFA-198. Admit that Standard Paint Company was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 198:

Denied.

GAF-RFA-199. Admit that Standard Paint Company was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 199:

Denied.

GAF-RFA-200. Admit that Standard Paint Company was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 200:

Denied.

GAF-RFA-201. Admit that Standard Paint Company was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 201:

Denied.

GAF-RFA-202. Admit that Standard Paint Company was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 202:

Denied.

GAF-RFA-203. Admit that Standard Paint Company was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 203:

Denied.

GAF-RFA-204. Admit that Standard Paint Company was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 204:

Denied.

GAF-RFA-205. Admit that Standard Paint Company was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 205:

Denied.

GAF-RFA-206. Admit that Standard Paint Company was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 206:

Denied.

GAF-RFA-207. Admit that Standard Paint Company was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 207:

Denied.

GAF-RFA-208. Admit that Standard Paint Company was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 208:

Denied.

GAF-RFA-209. Admit that Standard Paint Company was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 209:

Denied.

GAF-RFA-210. Admit that Standard Paint Company was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 210:

Denied.

GAF-RFA-211. Admit that Standard Paint Company was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 211:

Denied.

GAF-RFA-212. Admit that Standard Paint Company was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 212:

Denied.

GAF-RFA-213. Admit that Standard Paint Company was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 213:

Denied.

GAF-RFA-214. Admit that Standard Paint Company was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 214:

Denied.

GAF-RFA-215. Admit that The Ruberoid Co. was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 215:

GAF admits that The Ruberoid Co. was a member of the National Safety Council from 1958 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-216. Admit that The Ruberoid Co. was a member of the Thermal Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 216:

Denied.

GAF-RFA-217. Admit that The Ruberoid Co. was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 217:

Denied.

GAF-RFA-218. Admit that The Ruberoid Co. was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 218:

Denied.

GAF-RFA-219. Admit that The Ruberoid Co. was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 219:

Denied.

GAF-RFA-220. Admit that The Ruberoid Co. was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 220:

GAF admits that The Ruberoid Co. was a member of the Mineral Fiber Products Bureau from 1964 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-221. Admit that The Ruberoid Co. was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 221:

GAF admits that The Ruberoid Co. was a member of the Mineral Fiber Products Bureau from 1946 to 1964; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-222. Admit that The Ruberoid Co. was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 222:

Denied.

GAF-RFA-223. Admit that The Ruberoid Co. was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 223:

Denied.

GAF-RFA-224. Admit that The Ruberoid Co. was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 224:

Denied.

GAF-RFA-225. Admit that The Ruberoid Co. was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 225:

GAF admits that The Ruberoid Co. was a member of the Asphalt and Vinyl Asbestos Tile Institute from 1959 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-226. Admit that The Ruberoid Co. was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 226:

GAF admits that The Ruberoid Co. was a member of the American Society of Testing Materials from approximately 1946 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-227. Admit that The Ruberoid Co. was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 227:

GAF admits that The Ruberoid Co. was a member of the Gypsum Association from 1955 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-228. Admit that The Ruberoid Co. was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 228:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-229. Admit that The Ruberoid Co. was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 229:

Denied.

GAF-RFA-230. Admit that The Ruberoid Co. was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 230:

After making reasonable inquiry into the information known or readily obtainable by GAF,
GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-231. Admit that The Ruberoid Co. was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 231:

After making reasonable inquiry into the information known or readily obtainable by GAF,
GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-232. Admit that The Ruberoid Co. was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 232:

After making reasonable inquiry into the information known or readily obtainable by GAF,
GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-233. Admit that Mastic Tile was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 233:

Denied.

GAF-RFA-234. Admit that Mastic Tile was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 234:

Denied.

GAF-RFA-235. Admit that Mastic Tile was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 235:

Denied.

GAF-RFA-236. Admit that Mastic Tile was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 236:

Denied.

GAF-RFA-237. Admit that Mastic Tile was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 237:

Denied.

GAF-RFA-238. Admit that Mastic Tile was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 238:

Denied.

GAF-RFA-239. Admit that Mastic Tile was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 239:

Denied.

GAF-RFA-240. Admit that Mastic Tile was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 240:

Denied.

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-247. Admit that Mastic Tile was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 247:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-248. Admit that Mastic Tile was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 248:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-249. Admit that Mastic Tile was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 249:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-250. Admit that Mastic Tile was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 250:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-251. Admit that Sandura was a member of the National Insulation Manufacturers Association (NIMA).

GAF-RFA-252. Admit that Sandura was a member of the National Insulation Manufacturers Association (TIMA).

GAF-RFA-253. Admit that Sandura was a member of the Industrial Health Foundation (IHF).

GAF-RFA-254. Admit that Sandura was a member of the Air Hygiene Foundation of America, Inc.

GAF-RFA-255. Admit that Sandura was a member of the Asbestos Textile Institute.

GAF-RFA-256. Admit that Sandura was a member of the Mineral Fiber Products Bureau.

GAF-RFA-257. Admit that Sandura was a member of the Asbestos Cement Product Association.

GAF-RFA-258. Admit that Sandura was a member of the Quebec Asbestos Mining Association.

GAF-RFA-259. Admit that Sandura was a member of the Asbestos Information/NA.

GAF-RFA-260. Admit that Sandura was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 251-260:

Denied.

GAF-RFA-261. Admit that Sandura was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 261:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-262. Admit that Sandura was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 262:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-263. Admit that Sandura was a member of the Gypsum Association.

GAF-RFA-241. Admit that Mastic Tile was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 241:

Denied.

GAF-RFA-242. Admit that Mastic Tile was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 242:

Denied.

GAF-RFA-243. Admit that Mastic Tile was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 243:

GAF admits that Mastic Tile was a member of the Asphalt and Vinyl Asbestos Tile Institute from the 1940s to 1959; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-244. Admit that Mastic Tile was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 244:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-245. Admit that Mastic Tile was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 245:

Denied.

GAF-RFA-246. Admit that Mastic Tile was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 246:

GAF'S RESPONSE TO RFA 263:

Denied.

GAF-RFA-264. Admit that Sandura was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 264:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-265. Admit that Sandura was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 265:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-266. Admit that Sandura was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 266:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-267. Admit that Sandura was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 267:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-268. Admit that Sandura was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 268:

Denied.

GAF-RFA-269. Admit that Vermont Production Company, Inc. was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 269:

Denied.

GAF-RFA-270. Admit that Vermont Production Company, Inc. was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 270:

Denied.

GAF-RFA-271. Admit that Vermont Production Company, Inc. was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 271:

Denied.

GAF-RFA-272. Admit that Vermont Production Company, Inc. was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 272:

Denied.

GAF-RFA-273. Admit that Vermont Production Company, Inc. was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 273:

Denied.

GAF-RFA-274. Admit that Vermont Production Company, Inc. was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 274:

Denied.

GAF-RFA-275. Admit that Vermont Production Company, Inc. was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 275:

Denied.

GAF-RFA-276. Admit that Vermont Production Company, Inc. was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 276:

Denied.

GAF-RFA-277. Admit that Vermont Production Company, Inc. was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 277:

Denied.

GAF-RFA-278. Admit that Vermont Production Company, Inc. was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 278:

Denied.

GAF-RFA-279. Admit that Vermont Production Company, Inc. was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 279:

Denied.

GAF-RFA-280. Admit that Vermont Production Company, Inc. was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 280:

Denied.

GAF-RFA-281. Admit that Vermont Production Company, Inc. was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 281:

Denied.

GAF-RFA-282. Admit that Vermont Production Company, Inc. was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 282:

Denied.

GAF-RFA-283. Admit that Vermont Production Company, Inc. was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 283:

Denied.

GAF-RFA-284. Admit that Vermont Production Company, Inc. was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 284:

Denied.

GAF-RFA-285. Admit that Vermont Production Company, Inc. was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 285:

Denied.

GAF-RFA-286. Admit that Vermont Production Company, Inc. was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 286:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-287. Admit that H. F. Watson Co. was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 287:

Denied.

GAF-RFA-288. Admit that H. F. Watson Co. was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 288:

Denied.

GAF-RFA-289. Admit that H. F. Watson Co. was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 289:

Denied.

GAF-RFA-290. Admit that H. F. Watson Co. was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 290:

Denied.

GAF-RFA-291. Admit that H. F. Watson Co. was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 291:

Denied.

GAF-RFA-292. Admit that H. F. Watson Co. was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 292:

Denied.

GAF-RFA-293. Admit that H. F. Watson Co. was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 293:

Denied.

GAF-RFA-294. Admit that H. F. Watson Co. was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 294:

Denied.

GAF-RFA-295. Admit that H. F. Watson Co. was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 295:

Denied.

GAF-RFA-296. Admit that H. F. Watson Co. was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 296:

Denied.

GAF-RFA-297. Admit that H. F. Watson Co. was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 297:

Denied.

GAF-RFA-298. Admit that H. F. Watson Co. was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 298:

Denied.

GAF-RFA-299. Admit that H. F. Watson Co. was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 299:

Denied.

GAF-RFA-300. Admit that H. F. Watson Co. was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 300:

Denied.

GAF-RFA-301. Admit that H. F. Watson Co. was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 301:

Denied.

GAF-RFA-302. Admit that H. F. Watson Co. was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 302:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-303. Admit that H. F. Watson Co. was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 303:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-304. Admit that H. F. Watson Co. was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 304:

Denied.

GAF-RFA-305. Admit that Eternit, Inc. was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 305:

Denied.

GAF-RFA-306. Admit that Eternit, Inc. was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 306:

Denied.

GAF-RFA-307. Admit that Eternit, Inc. was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 307:

Denied.

GAF-RFA-308. Admit that Eternit, Inc. was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 308:

Denied.

GAF-RFA-309. Admit that Eternit, Inc. was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 309:

Denied.

GAF-RFA-310. Admit that Eternit, Inc. was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 310:

Denied.

GAF-RFA-311. Admit that Eternit, Inc. was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 311:

Denied.

GAF-RFA-312. Admit that Eternit, Inc. was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 312:

Denied.

GAF-RFA-313. Admit that Eternit, Inc. was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 313:

Denied.

GAF-RFA-314. Admit that Eternit, Inc. was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 314:

Denied.

GAF-RFA-315. Admit that Eternit, Inc. was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 315:

Denied.

GAF-RFA-316. Admit that Eternit, Inc. was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 316:

Denied.

GAF-RFA-317. Admit that Eternit, Inc. was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 317:

Denied.

GAF-RFA-318. Admit that Eternit, Inc. was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 318:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-319. Admit that Eternit, Inc. was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 319:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-320. Admit that Eternit, Inc. was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 320:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-321. Admit that Eternit, Inc. was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 321:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-322. Admit that Eternit, Inc. was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 322:

After making reasonable inquiry into the information known or readily obtainable by GAF, GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-323. Admit that Vermont Asbestos Mines was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 323:

Denied. The Ruberoid Co., which owned the mine, was a member of NIMA. (See Response to RFA 215).

GAF-RFA-324. Admit that Vermont Asbestos Mines was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 324:

Denied. See Response to RFA107-124; 179-196; 215-232.

GAF-RFA-325. Admit that Vermont Asbestos Mines was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 325:

Denied. See Response to RFA 324.

GAF-RFA-326. Admit that Vermont Asbestos Mines was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 326:

Denied. See Response to RFA 324.

GAF-RFA-327. Admit that Vermont Asbestos Mines was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 327:

Denied. See Response to RFA 324.

GAF-RFA-328. Admit that Vermont Asbestos Mines was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 328:

Denied. See Response to RFA 324.

GAF-RFA-329. Admit that Vermont Asbestos Mines was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 329:

Denied. See Response to RFA 324.

GAF-RFA-330. Admit that Vermont Asbestos Mines was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 330:

Denied. See Response to RFA 324.

GAF-RFA-331. Admit that Vermont Asbestos Mines was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 331:

Denied. See Response to RFA 324.

GAF-RFA-332. Admit that Vermont Asbestos Mines was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 332:

Denied. See Response to RFA 324.

GAF-RFA-333. Admit that Vermont Asbestos Mines was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 333:

Denied. See Response to RFA 324.

GAF-RFA-334. Admit that Vermont Asbestos Mines was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 334:

Denied. See Response to RFA 324.

GAF-RFA-335. Admit that Vermont Asbestos Mines was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 335:

Denied. See Response to RFA 324.

GAF-RFA-336. Admit that Vermont Asbestos Mines was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 336:

Denied. See Response to RFA 324.

GAF-RFA-337. Admit that Vermont Asbestos Mines was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 337:

Denied. See Response to RFA 324.

GAF-RFA-338. Admit that Vermont Asbestos Mines was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 338:

Denied. See Response to RFA 324.

GAF-RFA-339. Admit that Vermont Asbestos Mines was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 339:

Denied. See Response to RFA 324.

GAF-RFA-340. Admit that Vermont Asbestos Mines was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 340:

Denied. See Response to RFA 324.

GAF-RFA-341. Admit that G-I Holdings, Inc. was a member of the National Insulation Manufacturers Association (NIMA).

GAF'S RESPONSE TO RFA 341:

Denied.

GAF-RFA-342. Admit that G-I Holdings, Inc. was a member of the National Insulation Manufacturers Association (TIMA).

GAF'S RESPONSE TO RFA 343:

Denied.

GAF-RFA-343. Admit that G-I Holdings, Inc. was a member of the Industrial Health Foundation (IHF).

GAF'S RESPONSE TO RFA 343:

Denied.

GAF-RFA-344. Admit that G-I Holdings, Inc. was a member of the Air Hygiene Foundation of America, Inc.

GAF'S RESPONSE TO RFA 344:

Denied.

GAF-RFA-345. Admit that G-I Holdings, Inc. was a member of the Asbestos Textile Institute.

GAF'S RESPONSE TO RFA 345:

Denied.

GAF-RFA-346. Admit that G-I Holdings, Inc. was a member of the Mineral Fiber Products Bureau.

GAF'S RESPONSE TO RFA 346:

Denied.

GAF-RFA-347. Admit that G-I Holdings, Inc. was a member of the Asbestos Cement Product Association.

GAF'S RESPONSE TO RFA 347:

Denied.

GAF-RFA-348. Admit that G-I Holdings, Inc. was a member of the Quebec Asbestos Mining Association.

GAF'S RESPONSE TO RFA 348:

Denied.

GAF-RFA-349. Admit that G-I Holdings, Inc. was a member of the Asbestos Information/NA.

GAF'S RESPONSE TO RFA 349:

Denied.

GAF-RFA-350. Admit that G-I Holdings, Inc. was a member of the Resilient Floor Covering Institute.

GAF'S RESPONSE TO RFA 350:

Denied.

GAF-RFA-351. Admit that G-I Holdings, Inc. was a member of the Asphalt and Vinyl Asbestos Tile Institute.

GAF'S RESPONSE TO RFA 351:

Denied.

GAF-RFA-352. Admit that G-I Holdings, Inc. was a member of the American Society of Testing Materials.

GAF'S RESPONSE TO RFA 352:

Denied.

GAF-RFA-353. Admit that G-I Holdings, Inc. was a member of the Gypsum Association.

GAF'S RESPONSE TO RFA 353:

Denied.

GAF-RFA-354. Admit that G-I Holdings, Inc. was a member of the National Industrial Conference Board.

GAF'S RESPONSE TO RFA 354:

Denied.

GAF-RFA-355. Admit that G-I Holdings, Inc. was a member of the National Safety Council.

GAF'S RESPONSE TO RFA 355:

Denied.

GAF-RFA-356. Admit that G-I Holdings, Inc. was a member of the Air Pollution Control Association.

GAF'S RESPONSE TO RFA 356:

Denied.

GAF-RFA-357. Admit that G-I Holdings, Inc. was a member of the Water Pollution Control Association.

GAF'S RESPONSE TO RFA 357:

Denied.

GAF-RFA-358. Admit that G-I Holdings, Inc. was a member of the American Institute of Mining Engineers.

GAF'S RESPONSE TO RFA 358:

Denied.

GAF-RFA-359. Admit that a lawsuit was filed against Eternit and Ruberoid in 1934 by Alexander Smith alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 359:

Admitted.

GAF-RFA-360. Admit that a lawsuit was filed against Eternit and Ruberoid in 1934 by Samuel Robertson alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 360:

Admitted.

GAF-RFA-361. Admit that a lawsuit was filed against Eternit, Inc. and Frank Smith in 1934 by Robert Huth alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 361:

Admitted.

GAF-RFA-362. Admit that a lawsuit was filed against Eternit, Inc., Eternit Mills and The Ruberoid Co. in 1934 by George Walter alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 362:

Admitted.

GAF-RFA-363. Admit that a lawsuit was filed against Eternit and Ruberoid in 1935 by Hughie Easley alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 363:

Admitted.

GAF-RFA-364. Admit that a lawsuit was filed against Eternit and Ruberoid in 1935 by Weaver and an unknown plaintiff alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 364:

Admitted.

GAF-RFA-365. Admit that a lawsuit was filed against Eternit, Inc. and The Ruberoid Co. in 1935 by Almer Johnson alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 365:

Denied.

GAF-RFA-366. Admit that a lawsuit was filed against Eternit, Inc. and The Ruberoid Co. in 1935 by Carl Hicks alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 366:

Admitted.

GAF-RFA-367. Admit that a lawsuit was filed against Eternit, Inc., Eternit Mills, and The Ruberoid Co. in 1935 by Eugene Lantsought alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 367:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-368. Admit that a lawsuit was filed against Eternit, Inc., Eternit Mills, The Ruberoid Corp. and Paul Beason in 1936 by Kelsey and Stites alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 368:

Denied.

GAF-RFA-369. Admit that a *Claim for Compensation for Asbestosis* was filed in 1952 by Fee James alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 369:

Admitted.

GAF-RFA-370. Admit that a lawsuit was filed against Ruberoid Co. in 1954 by Reed alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 370:

Admitted.

GAF-RFA-371. Admit that a lawsuit was filed against Travelers Insurance Company in 1961 by Gladys Faciane alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 371:

Admitted.

GAF-RFA-372. Admit that a lawsuit was filed against The Ruberoid Co. in 1964 by Reed C. Manosh alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 372:

Admitted that a worker's compensation claim was filed against Ruberoid in either 1964 or 1965.

GAF-RFA-373. Admit that a lawsuit was filed against The Ruberoid Co. in 1967 by Demeter Stanislaw alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 373:

Admitted that a worker's compensation claim was filed.

GAF-RFA-374. Admit that a lawsuit was filed against The Ruberoid Co. in 1968 by Arthur J. Lumbra alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 374:

Admitted that a worker's compensation claim was filed.

GAF-RFA-375. Admit that a lawsuit was filed against The Ruberoid Co. in 1968 by Charles Nikola alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 375:

Admitted that a worker's compensation claim was filed.

GAF-RFA-376. Admit that a lawsuit was filed against Fibreboard Paper Products Corporation, et al. in 1970 by Clarence Borel alleging asbestos caused disease.

GAF'S RESPONSE TO RFA 376:

Admitted.

GAF-RFA-377. Admit that The Ruberoid Co. conducted mining operations in Vermont in 1951.

GAF'S RESPONSE TO RFA 377:

Admitted.

GAF-RFA-378. Admit that because The Ruberoid Co. conducted mining operations in Vermont in 1951, The Ruberoid Co. was subject to the Vermont Workmen's Compensation law in effect since 1951.

GAF'S RESPONSE TO RFA 378:

Objection. Calls for legal conclusion.

GAF-RFA-379. Admit that General Aniline & Film Corporation operated as a Delaware corporation in 1941.

GAF'S RESPONSE TO RFA 379:

Admitted.

GAF-RFA-380. Admit that because General Aniline and Film Corporation operated as a Delaware corporation in 1941, General Aniline and Film Corporation was subject to the Delaware Workmen's Compensation law in effect since 1941.

GAF'S RESPONSE TO RFA 380:

Objection. Calls for a legal conclusion.

GAF-RFA-381. Admit that The Ruberoid Co. conducted plant operations in Minnesota in 1943.

GAF'S RESPONSE TO RFA 381:

Admitted.

GAF-RFA-382. Admit that because the Ruberoid Co. conducted plant operations in Minnesota in 1943, The Ruberoid Co. was subject to the Minnesota Workmen's Compensation law in effect since 1943.

GAF'S RESPONSE TO RFA 382:

Objection. Calls for a legal conclusion.

GAF-RFA-383. Admit that The Ruberoid Co. conducted plant operations in New Jersey in 1945.

GAF'S RESPONSE TO RFA 383:

Admitted.

GAF-RFA-384. Admit that because The Ruberoid Co. conducted plant operations in New Jersey in 1945, The Ruberoid Co. was subject to the New Jersey Workmen's Compensation law in effect since 1945.

GAF'S RESPONSE TO RFA 384:

Objection. Calls for a legal conclusion.

GAF-RFA-385. Admit that General Aniline and Film Corporation conducted plant operations in New Jersey in 1945.

GAF'S RESPONSE TO RFA 385:

Admitted.

GAF-RFA-386. Admit that because General Aniline and Film Corporation conducted plant operations in New Jersey in 1945, General Aniline and Film Corporation was subject to the New Jersey Workmen's Compensation law in effect since 1945.

GAF'S RESPONSE TO RFA 386:

Objection. Calls for a legal conclusion.

GAF-RFA-387. Admit that The Ruberoid Co. conducted manufacturing operations in Pennsylvania in 1937.

GAF'S RESPONSE TO RFA 387:

Admitted.

GAF-RFA-388. Admit that because The Ruberoid Co. conducted manufacturing operations in Pennsylvania in 1937, The Ruberoid Co. was subject to the Pennsylvania Workmen's Compensation law in effect since 1937.

GAF'S RESPONSE TO RFA 388:

Objection. Calls for a legal conclusion.

GAF-RFA-389. Admit that The Ruberoid Co. operated as a West Virginia corporation in 1949.

GAF'S RESPONSE TO RFA 389:

Denied.

GAF-RFA-390. Admit that because The Ruberoid Co. operated as a West Virginia corporation in 1949, The Ruberoid Co. was subject to the West Virginia Workmen's Compensation law in effect since 1949.

GAF'S RESPONSE TO RFA 390:

Objection. Calls for a legal conclusion.

GAF-RFA-391. Admit that General Aniline and Film Corporation conducted operations in California.

GAF'S RESPONSE TO RFA 391:

GAF admits General Aniline & Film Corporation conducted operations in California related to flooring from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-392. Admit that because General Aniline and Film Corporation conducted operations in California, General Aniline and Film Corporation was subject to the California Workmen's Compensation law that had been in effect since 1917.

GAF'S RESPONSE TO RFA 392:

Objection. Calls for a legal conclusion.

GAF-RFA-393. Admit that The Ruberoid Co. conducted operations in California.

GAF'S RESPONSE TO RFA 393:

GAF admits that The Ruberoid Co. conducted operations in California related to flooring from 1959 to 1967; GAF specifically objects to this Request to the extent it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-394. Admit that because The Ruberoid Co. conducted operations in California, The Ruberoid Co. was subject to the California Workmen's Compensation law that had been in effect since 1917.

GAF'S RESPONSE TO RFA 394:

Objection. Calls for a legal conclusion.

GAF-RFA-395. Admit that The Ruberoid Co.'s executive offices were located in New York in 1935.

GAF'S RESPONSE TO RFA 395:

GAF admits that The Ruberoid Co.'s executive offices were located in New York in 1935;

GAF specifically objects to this Request to the extent that it seeks further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-396. Admit that because The Ruberoid Co.'s executive offices were located in New York in 1935, The Ruberoid Co. was subject to the New York Workmen's Compensation law in effect since 1935.

GAF'S RESPONSE TO RFA 396:

Objection. Calls for a legal conclusion.

GAF-RFA-397. Admit that General Aniline and Film Corporation conducted manufacturing and/or sales operations in Missouri in 1959.

GAF'S RESPONSE TO RFA 397:

Admitted.

GAF-RFA-398. Admit that because General Aniline and Film Corporation conducted manufacturing and/or sales operations in Missouri in 1959, General Aniline and Film Corporation was subject to the Missouri Workmen's Compensation law in effect since 1959.

GAF'S RESPONSE TO RFA 398:

Objection. Calls for a legal conclusion.

GAF-RFA-399. Admit that General Aniline and Film Corporation conducted manufacturing and/or sales operations in Illinois.

GAF'S RESPONSE TO RFA 399:

Admitted as to asbestos-containing products for the years 1967-1968.

GAF-RFA-400. Admit that because General Aniline and Film Corporation conducted manufacturing and/or sales operations in Illinois, General Aniline and Film Corporation was subject to the Illinois Workmen's Compensation law in effect since 1913.

GAF'S RESPONSE TO RFA 400:

Objection. Calls for a legal conclusion.

GAF-RFA-401. Admit that General Aniline and Film Corporation conducted manufacturing and/or sales operations in Maryland.

GAF'S RESPONSE TO RFA 401:

GAF admits that General Aniline & Film Corporation conducted operations in Maryland from 1967 to 1968; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-402. Admit that because General Aniline and Film Corporation conducted manufacturing and/or sales operations in Maryland, General Aniline and Film Corporation was subject to the Maryland Workmen's Compensation law in effect since 1939.

RESPONSE TO RFA 402:

Objection. Calls for a legal conclusion.

GAF-RFA-403. Admit that The Ruberoid Co. conducted manufacturing and/or sales operations in Missouri.

GAF'S RESPONSE TO RFA 403:

GAF admits that The Ruberoid Co. conducted manufacturing and/or sales in Missouri from 1932 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-404. Admit that because The Ruberoid Co. conducted manufacturing and/or sales operations in Missouri, The Ruberoid Co. was subject to the Missouri Workmen's Compensation law in effect since 1959.

GAF'S RESPONSE TO RFA 404:

Objection. Calls for a legal conclusion.

GAF-RFA-405. Admit that The Ruberoid Co. conducted manufacturing and/or sales operations in Illinois.

GAF'S RESPONSE TO RFA 405:

GAF admits that The Ruberoid Co. conducted manufacturing and/or sales in Illinois from 1959 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-406. Admit that because The Ruberoid Co. conducted manufacturing and/or sales operations in Illinois, The Ruberoid Co. was subject to the Illinois Workmen's Compensation law in effect since 1913.

GAF'S RESPONSE TO RFA 406:

Objection. Calls for a legal conclusion.

GAF-RFA-407. Admit that The Ruberoid Co. conducted manufacturing and/or sales operations in Maryland.

GAF'S RESPONSE TO RFA 407:

GAF admits that The Ruberoid Co. conducted manufacturing and/or sales operations in Maryland from 1950 to 1967; GAF specifically objects to this Request to the extent that it seeks a further response on the grounds that this Request is misleading and fails to specify a time period.

GAF-RFA-408. Admit that because The Ruberoid Co. conducted manufacturing and/or sales operations in Maryland, The Ruberoid Co. was subject to the Maryland Workmen's Compensation law in effect since 1939.

GAF'S RESPONSE TO RFA 408:

Objection. Calls for a legal conclusion.

GAF-RFA-409. Admit that I. G. Farben conducted manufacturing operations in Germany.

GAF'S RESPONSE TO RFA 409:

After making reasonable inquiry into the information known or readily obtainable by GAF,

GAF lacks sufficient knowledge to either admit or deny this Request.

GAF-RFA-410. Admit that because I. G. Farben conducted manufacturing operations in Germany, I. G. Farben was subject to Germany's Third Occupational Disease Ordinance in effect since 1936.

GAF'S RESPONSE TO RFA 410:

Objection. Calls for a legal conclusion.

GAF-RFA-411. Admit that the information shown on Appendix A is a correct summary of the products manufactured by GAF, the years during which the product was produced, the asbestos content, the trade names of the product, and the asbestos fiber suppliers for the products.

GAF'S RESPONSE TO RFA 411:

Denied.

GAF-RFA-412. Admit that the information shown on Appendix B is a correct list of articles in the medical literature that were abstracted and published by the Industrial Hygiene Foundation before Ruberoid resigned from the Industrial Hygiene Foundation.

GAF'S RESPONSE TO RFA 412:

Denied.

GAF-RFA-413. Admit that the information shown on Appendix C is correct, i.e., that a search through Asbestos Magazine from December 1935 through December 1953 reveals 491 articles in which GAF, Ruberoid Co., Vermont Mines, or officers of one of these corporations was mentioned as shown in this five-page digest.

GAF'S RESPONSE TO RFA 413:

Denied.