

PLAINTIFF'S  
EXHIBIT

GTR-18

BRAYTON & ASSOC

FEB 13 1991

File  
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WILLIAM G. HOBACK, ESQ.

ERICKSEN, ARBUTHNOT, BROWN, KILDUFF & DAY, Inc.

1304 Willow Street

Martinez, California 94553

(415) 229-1702

Attorneys for Defendant(s),  
THE GOODYEAR TIRE & RUBBER COMPANY

7010

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GOODYEAR

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Tab 6

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SOLANO

IN RE:

SOLANO COUNTY COMPLEX  
ASBESTOS LITIGATION

No. 2830

THE GOODYEAR TIRE & RUBBER  
COMPANY'S ANSWERS TO PLAIN-  
TIFFS' STANDARD INTERRO-  
GATORIES TO DEFENDANTS,  
GENERAL ORDER NO. 30.00

COMES NOW defendant, THE GOODYEAR TIRE & RUBBER COMPANY  
(hereinafter "GOODYEAR"), and pursuant to the provisions  
of General Order No. 30.00, and under the applicable California  
Code of Civil Procedure sections and in compliance with the  
California Rules of Court and Local Rules of Court, answers the  
interrogatories propounded by plaintiffs, as follows:

PRELIMINARY STATEMENT

The answers to these interrogatories are based upon a  
search of corporate files and records regularly maintained in  
the ordinary course of business of THE GOODYEAR TIRE & RUBBER  
COMPANY and information obtained during interviews with various  
employees of the company over a series of many years. However,  
THE GOODYEAR TIRE & RUBBER COMPANY's involvement in these  
matters is based on the fact that it distributed asbestos-

1 containing products manufactured by GOODYEAR AEROSPACE CORPORA-  
2 TION. The assets and interests of GOODYEAR AEROSPACE CORPORA-  
3 TION were sold to LORAL MANUFACTURING CORPORATION in 1987, and  
4 all records related to GOODYEAR AEROSPACE CORPORATION were trans-  
5 ferred to LORAL at the time of the sale. Thus, THE GOODYEAR  
6 TIRE & RUBBER COMPANY must rely principally on the memories of  
7 its employees to respond to interrogatories concerning details  
8 of the production and sale of GOODYEAR AEROSPACE CORPORATION  
9 asbestos-containing products.

10 No single person associated with THE GOODYEAR TIRE &  
11 RUBBER COMPANY has the knowledge or the documents necessary to  
12 supply every answer required or requested by these interroga-  
13 tories, and many of the individuals who may have had personal  
14 knowledge of the matters addressed by these interrogatories are  
15 presently unavailable to this answering defendant.

16 THE GOODYEAR TIRE & RUBBER COMPANY has little informa-  
17 tion available to identify customers to whom GOODYEAR AEROSPACE  
18 asbestos-containing products were sold. THE GOODYEAR TIRE &  
19 RUBBER COMPANY ceased marketing said products in 1978 and, as  
20 indicated above, any records reflecting such sales are no longer  
21 in its possession. With the exception of the answers as else-  
22 where herein provided, it is impossible to further identify  
23 quantity and type of product sold and delivered; to further  
24 identify and produce documents related to such sales or  
25 deliveries; or to state dates on which such products were sold  
26 or delivered.

27 Additionally, and in the context of either "CASE  
28 SPECIFIC" or "WORK SITE" interrogatory answers as defined by

1 this General Order and/or other general orders of this, or  
2 other, courts, further answers as may be contemplated or  
3 requested thereunder are impossible. All available and "geo-  
4 graphically defined" information pertaining to sales, work  
5 sites, warehouses, or otherwise as may be contemplated or  
6 requested thereunder is provided herein; same are expressly  
7 provided in response to any such "CASE SPECIFIC" or "WORK SITE"  
8 interrogatories that may be deemed served in any specific  
9 litigation or specific file matter.

10 Should further information be located regarding the  
11 subject matter of these interrogatories, THE GOODYEAR TIRE &  
12 RUBBER COMPANY will supplement its answers as such information  
13 becomes available.

14 Defendant, THE GOODYEAR TIRE & RUBBER COMPANY, has never  
15 mined asbestos nor manufactured, distributed or sold thermal  
16 insulation containing asbestos.

17 SPECIFIC ANSWERS.

18 1. (a) Hayes A. Jenkins

19 (b) THE GOODYEAR TIRE & RUBBER COMPANY, 1144 E.  
20 Market St., Akron, Ohio 44316.

21 (c) Objection. The scope of inquiry of this  
22 subpart is irrelevant to the subject matter of this litigation  
23 and is not likley to lead to the discovery of admissible  
24 evidence.

25 (d) Objection. The scope of inquiry of this  
26 subpart is irrelevant to the subject matter of this litigation  
27 and is not likley to lead to the discovery of admissible  
28 evidence.

- 1                   2.       (a)   THE GOODYEAR TIRE & RUBBER COMPANY  
2                               (b)   Ohio  
3                               (c)   1898  
4                               (d)   1144 East Market Street, Akron, Ohio 44316.  
5                               (e)   Not applicable.

6               3.       No.

7               4.       Yes, since approximately 1920.

8               5.       No.

9               6.       No.

10              7.       No.

11              8.       Yes.

12                   (a)   Industrial brakes, in which the brake  
13                   linings contained asbestos.

14                               (b)   1948.

15                               (c)   1972.

16                   (d)   Industrial brake linings were made with asbes-  
17                   tos type Chrysotile 7D. Percent of asbestos was 10% to  
18                   30% depending upon the lining. This was combined with  
19                   phenol-formaldehyde resin and sometimes copper and dust  
20                   to produce a solid molded and thermo-setting phenolite  
21                   compound which contained no free asbestos. There were a  
22                   number of different formulae at any one time and over  
23                   the years and specifications and formula changed from  
24                   time to time.

25                   (e)   Industrial brakes were used in off-the-road  
26                   hauler trucks, loaders, shuttle cars, foundry transfer  
27                   cars, lifters, mining cars and industrial equipment,  
28                   etc., i.e., non-over-the-road vehicles and equipment.

1 (f) The brake linings were marked with and ink  
2 stamped part numbers.

3 (g) See Subpart (e) above.

4 (h) THE GOODYEAR TIRE & RUBBER COMPANY until  
5 around 1970 and its wholly-owned subsidiary, GOODYEAR  
6 AEROSPACE CORPORATION, after that.

7 (i) Lake Asbestos of Quebec, Ltd.  
8 P.O. Box 88  
9 Black Lake, Quebec

10 Asbestos Corporation, Ltd.  
11 1940 Sun Life Bldg.  
12 1155 Metcalfe Street  
13 Montreal, Quebec H5B 2x6

14 Johns-Manville Canada, Inc.  
15 295 The West Mall  
16 Etobicoke, Ontario M96 427

17 Bell Asbestos Mines, Inc.  
18 P.O. Box 99  
19 Thetford Mines, Quebec C6G 5S4

20 (j) None.

21 (a) Asbestos gasket material, sometimes called  
22 asbestos packing material.

23 (b) About 1914.

24 (c) Discontinued in 1969 by THE GOODYEAR TIRE &  
25 RUBBER COMPANY when production was transferred to  
26 Goodyear Canada, Inc. Discontinued by the latter in  
27 1973.

28 (d) Approximately 80% chrysotile asbestos and 20%  
rubber. There were various minor changes in specifica-  
tions and formulation over the years.

(e) The product was used to cut gaskets from it.

1 (f) The product was marked Goodyearite or Durabla.

2 (g) See Subpart (e) above.

3 (h) Goodyear.

4 (i) See Subpart (i) above.

5 (j) None.

6  
7 (a) Industrial furnace door hose with an outer ply  
8 of woven fabric of asbestos and cotton not manufactured  
9 by GOODYEAR and asbestos content not known was imbedded  
10 in the outer layer of rubber. Fabric content accounted  
11 for approximately 10% of total product weight.

12 Industrial steam hose, including pile driver hose with  
13 braided 9 cut 2-ply yarn of asbestos and cotton. The  
14 ply accounted for approximately 3.78% by weight.

15 (b) GOODYEAR industrial hose.

16 (c) Furnace door hose from about 1959 until 1976  
17 steam hose from about 1931 until 1970.

18 (d) See Subpart (a) above.

19 (e) See Subpart (a) above.

20 (f) GOODYEAR at its Plant 2 in Akron, Ohio, and a  
21 former plant in North Chicago, Illinois.

22 (g) See Subpart (a) above.

23 (h) GOODYEAR.

24 (i) None.

25 (j) None.

26  
27 Conveyor belt with asbestos burn shield. The material  
28 was manufactured by others and we are unable to determine

1 asbestos content. The burn shield accounted for approximately  
2 5% of the product's weight.

3 (a) GOODYEAR conveyor belt.

4 (b) Before 1962.

5 (c) 1962.

6 (d) See Subpart (a) above.

7 (e) See Subpart (a) above.

8 (f) None.

9 (g) Conveying hot material.

10 (h) GOODYEAR at its Plant 2 in Akron, Ohio.

11 (i) None.

12 (j) Not applicable.

13  
14 (a) Goodyear adhesive.

15 (b) 1970.

16 (c) 1981.

17 (d) A styrene butadiene rubber resin mastic con-  
18 taining 30% petroleum distillate and 1.3% asbestos.

19 (e) The product was a viscous material placed in  
20 caulk tubes and used as an adhesive to bond material  
21 together, for instance, in furniture repair, paneling,  
22 etc.

23 (f) Goodyear.

24 (g) See Subpart (e) above.

25 (h) Goodyear at its former Ashland, Ohio plant.

26 (i) Johns-Manville.

27 (j) None.

28 9. No.

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(a) through (f) Not applicable.

10. No.

(a) through (j) Not applicable.

11. No.

(a) through (f) Not applicable.

12. Yes.

(a) Motor Wheel Corporation, with principal office at 1600 Larch Street, and subsequently 4000 Collins Road, Lansing, Michigan.

(b) Unknown.

(c) Michigan.

(d) 1/17/64.

(e) 12/26/86.

(f) Plants were in Ashburn, Georgia, Rolling Prarie, Indiana, Newton, Kansas, Pine Grove, Pennsylv-  
vania, Chicago Ridge, Illinois, and La Grange, Indiana.

(g) The company produced electric brakes for mobile homes and trailers with asbestos brake linings. Also heaters which are sometimes referred to as furnaces for mobile homes in which 3 or 4 pre-cut asbestos gaskets were installed, usually in heat chamber connections to the manifold.

(a) Goodyear Aerospace Corporation.

(b) 1939.

(c) Delaware.

(d) 1934.

1 (e) 1987.  
2 (f) Akron, Ohio.  
3 (g) Industrial brakes as described in answers to  
4 prior interrogatories and aircraft brakes.  
5 13. No.  
6 14. No as to raw asbestos fiber. As to asbestos-  
7 containing products, GOODYEAR lacks records or sufficient  
8 information to enable an answer; however, belief is the response  
9 is no.  
10 (a) through (c) Not applicable.  
11 15. Yes.  
12 (a) The GOODYEAR TIRE & RUBBER COMPANY Plant 2 in  
13 Akron, Ohio, from 1913 to 1976, a former plant in North  
14 Chicago, Illinois from around 1959 to 1976 and a former  
15 plant in Ashland, Ohio from 1970 to 1981.  
16 16. See Answer to Interrogatory No. 8 above.  
17 17. No.  
18 (a) through (d) Not applicable.  
19 18. No.  
20 19. Yes.  
21 (a) Asbestos packing, also referred to as asbes-  
22 tos gasket material;  
23 (b) Federal;  
24 (c) September 23, 1919;  
25 (d) 1919 through 1979;  
26 (e) 1939, 1959;  
27 (f) THE GOODYEAR TIRE & RUBBER COMPANY;  
28 (g) Secretary of THE GOODYEAR TIRE & RUBBER CO.

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20. No.

(a) through (g) Not applicable.

21. This answering defendant lacks sufficient information to enable it to answer the inquiry made in this interrogatory; however, to the best information and belief by this answering defendant, the response is "No".

22. No.

(a) through (c) Not applicable.

23. Yes, as to advertisements published in trade journals. No, as to other such documents. Such documents would have been disposed of routinely in such departments where they were created under GOODYEAR's record retention schedule.

24. Yes.

Such advertisements as still exist are produced.  
See EXHIBIT "A" attached hereto.

25. (a) THE GOODYEAR TIRE & RUBBER COMPANY  
Corporate Executive Offices  
1144 E. Market Street  
Akron, Ohio 44316

(b) James Boyazis, Vice President and Secretary,  
whose address is the same as listed in Subpart (a) of  
this interrogatory.

26. Not applicable.

27. Not applicable.

28. Industrial brakes and brake linings were packaged in cardboard boxes of appropriate size and dimensions.

Asbestos gasket material was packaged in paper for shipment, in flat sheets 1/64 to 1/4 inch thick and 2-foot square and placed in cardboard boxes.

1       Hose was shipped in various lengths and dimensions  
2 wrapped in burlap or cardboard.

3       Conveyor belt in varying lengths and widths was wrapped  
4 in cardboard or burlap for shipment.

5       Adhesive was poured into 55-gallon drums and shipped to  
6 a distributor which repackaged the product in caulk tubes.

7       29. All were marked manufactured by THE GOODYEAR TIRE  
8 & RUBBER COMPANY, had the GOODYEAR winged foot logo and  
9 identified the contents. The printing and such were black and  
10 logos were sometimes blue and white. Gasket material manufac-  
11 tured for the Durabla Manufacturing Company identified that  
12 company instead, and is believed to have had the Durabla mark.

13       30. No.

14       (a) through (c) Not applicable.

15       31. Not applicable.

16       32. No.

17       33. No.

18       (a) through (e) Not applicable.

19       34. Yes, as the responsible federal agencies have  
20 published regulations on asbestos in the Federal Register over  
21 the years, GOODYEAR has transmitted those regulations to its  
22 nationwide operations directing that they be implemented and  
23 followed.

24       (a) Possibly some of such transmittals exist in  
25 some files somewhere. GOODYEAR has made no attempt to  
26 save them because as each federal regulation on the  
27 subject issues it supercedes prior ones and GOODYEAR  
28 personnel now rely on current regulations.

1 (b) Federal regulations relating to asbestos  
2 which are as equally available to plaintiff as to  
3 GOODYEAR are not in the custody of anyone but are freely  
4 distributed to operating personnel throughout the  
5 company nationwide.

6 35. Jay Wellman, M.D., Medical Director for THE GOOD-  
7 YEAR TIRE & RUBBER COMPANY;

8 J. L. Holtshouser, Manager of Industrial Hygiene  
9 for THE GOODYEAR TIRE & RUBBER COMPANY.

10 36. No.

11 37. (a) No.

12 (b) No.

13 (c) No.

14 (d) No.

15 (e) No.

16 (f) No.

17 (g) No.

18 (h) No.

19 (i) No.

20 (j) Yes.

21 (k) No.

22 (l) No.

23 (m) No.

24 (i) Not applicable.

25 38. (a) 1954 through 1988.

26 (b) All general publications and those peculiar  
27 to subcommittees to which GOODYEAR representatives  
28 belonged which issued over the period.

(c) Ergonomics subcommittee and Rubber & Plastic Subcommittee.

39. No.

40. Yes.

(a) Journal of Occupational Medicine.

(b) 1947.

(c) J. L. Holtshouser, THE GOODYEAR TIRE & RUBBER COMPANY, Corporate Headquarters, Akron, Ohio.

41. No.

42. No.

43. Yes.

(a) Plant 2 Akron, Ohio around 1970. Ashland, Ohio plant around 1970 to 1981.

(b) See Subpart (a) above.

(c) Corporate Industrial Hygiene Department.

(d) Yes, in part.

(e) Corporate Industrial Hygiene Department.

44. No.

(a) through (e) Not applicable.

45. No.

(a) through (e) Not applicable.

47. No.

(a) through (d) Not applicable.

48. No.

(a) through (d) Not applicable.

49. No.

(a) through (c) Not applicable.

50. One record suggests that such a claim was made in

1 1981. However, the first claim that GOODYEAR can verify with  
2 its records was made on 5/24/85.

3 51. Objection. This interrogatory is overly broad,  
4 lacking in particularity, response would be unduly burdensome,  
5 the information sought is immaterial in view of admission  
6 asbestos-containing products were produced, is not relevant to  
7 any other issue relative to this defendant and not calculated to  
8 lead to evidence which is either probative or admissible at time  
9 of trial.

10 52. Objection. This interrogatory is overly broad,  
11 lacking in particularity, response would be unduly burdensome,  
12 the information sought is immaterial in view of admission  
13 asbestos-containing products were produced, is not relevant to  
14 any other issue relative to this defendant and not calculated to  
15 lead to evidence which is either probative or admissible at time  
16 of trial.

17 53. Yes.

18 (a) - (c) GOODYEAR entered into contracts with  
19 various insurers to cover both this company and all its  
20 subsidiaries effective the dates shown below.

21 Hartford Accident & Indemnity Co. 7/1/40-1/1/49

22 Liberty Mutual Insurance Co. 1/1/49-1/1/53

23 Continental Casualty Co. 1/1/53-1/1/61

24 The Aetna Casualty & Surety Co. 1/1/61-1/1/71

25 The Travelers Indemnity Co. 1/1/71-1/1/77

26 The aforelisted insurers provided general liability  
27 coverage with limits of \$300,000 per person, \$1,000,000  
28 per occurrence for bodily injury. Since 1/1/77,

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GOODYEAR has been self-insured for primary limits.

54. No.

(a) through (g) Not applicable.

55. No.

(a) through (g) Not applicable.

57. No.

(a) through (f) Not applicable.

DATED: January 29, 1991

ERICKSEN, ARBUTHNOT, BROWN,  
KILDUFF & DAY, Inc.

By: \_\_\_\_\_  
WILLIAM G. HOBACK

# BUY TWO,



Take advantage of this golden opportunity to sample full size packages of all these outstanding Goodyear adhesives products. You pay only \$3.49 for two items and get the other four free — a \$16.00 value. Simply return coupon with your check or take this ad to your local Goodyear dealer or building materials distributor.

W. J. Ruscoe Company, Dept. QR  
P. O. Box 2746  
Akron, Ohio 44301

Enclosed is my check for \$3.49. Please send me a Goodyear adhesives 6-pack. (Offer expires July 15, 1983)

NAME \_\_\_\_\_  
COMPANY \_\_\_\_\_  
STREET \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

# GET FOUR FREE!



**GOODYEAR**  
CHEMICALS



GY-CHM-P30014  
Buy Two, Get Four Free  
Pg. 4/C 31d.  
8-3/8 x 11-1/8 31d.  
7-3/8 x 10-1/8 LM  
Qualified Remodeler

# Plio-Nail, by Goodyear.

## It just might make the nail obsolete.

Plio-Nail® panel and construction adhesives can take care of almost every bonding project—inside and out, whether maintenance, or a complete remodeling job.

Use Plio-Nail construction adhesive for T&G flooring, house siding, stair treads/risers, blown shingling and roofing, drywall, metal, tile... even concrete and cement block.

Plio-Nail panel adhesive bonds wall panels, drywall, hardboard, corkboard, foam insulation... to studs, masonry, drywall or concrete.

Plio-Nail construction adhesives meet tough building codes and HUD requirements.

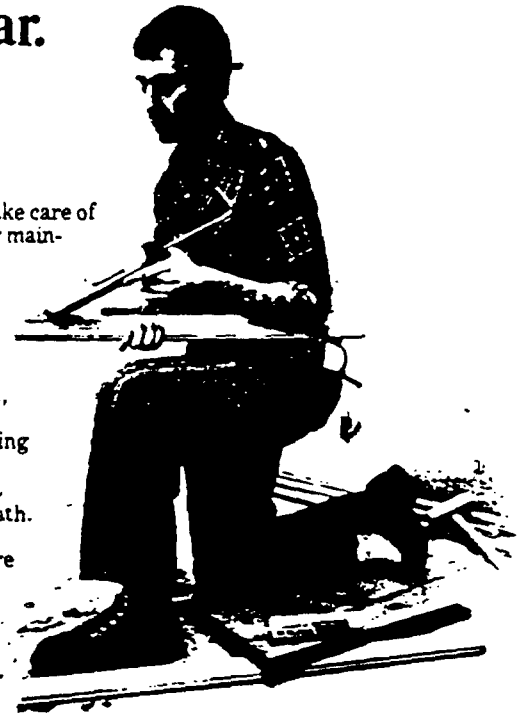
Look for the Goodyear blimp display in your store.

You'll find both Plio-Nail adhesives right underneath.

And probably notice less nails.

Contact W. J. Ruscoe at (216) 253-8148 for the store nearest you.

**GOODYEAR**  
CHEMICALS



GY-CHM-P30552-REVISED

Page 04 w/d

Ed 83'5 x 5'7

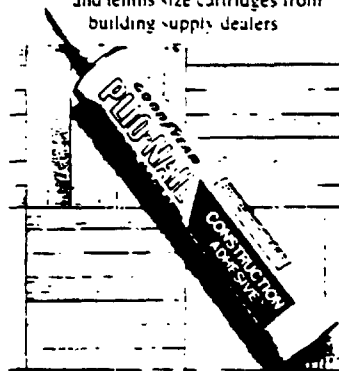
Lm 77'5 x 4 11'5

Family Handyman—May, June 1979

N W Ayer / ~~ALB~~ International

## Goodyear Plio-Nail puts it all together.

New Goodyear Plio-Nail<sup>®</sup> construction adhesive has high strength and excellent aging properties. Specially designed for bonding joists, flooring and siding. Meets HUD Specification AFG-01. Available in quart and tenth size cartridges from building supply dealers.



094-980-77-NP-0017  
1/6-page B&W  
Professional Builder &  
Apartment Business -- March 1977

## Plio-nail, by Goodyear.

### It just might make the nail obsolete.

Plio-Nail<sup>®</sup> panel and construction adhesives can take care of almost every bonding project—inside and out, whether maintenance or a complete remodeling job.

Use Plio-Nail construction adhesive for T&G flooring, house siding, stair treads/risers, blown shingling and roofing, drywall, metal, tile...even concrete and cement block.

Plio-Nail panel adhesive bonds wall panels, drywall, hardboard, corkboard, foam insulation...to studs, masonry, drywall or concrete.

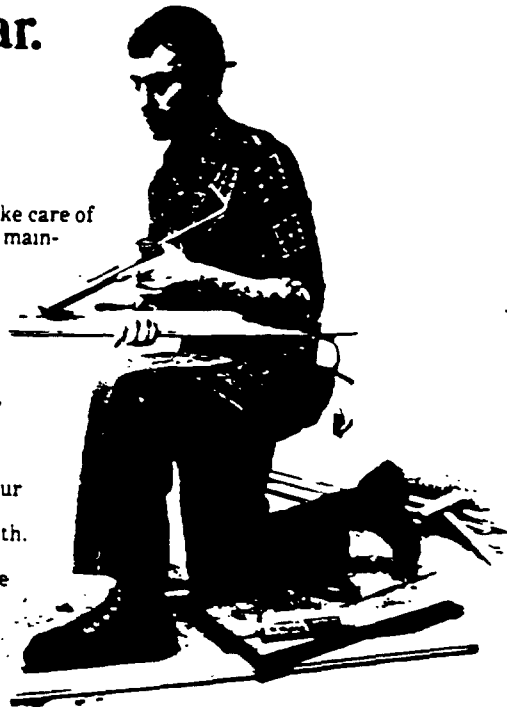
Both types meet tough building codes and HUD requirements.

Look for the Goodyear biimp display hanging in your store.

You'll find both Plio-Nail adhesives right underneath. And probably notice less nails.

Contact W. J. Ruscoe at (216) 253-8148 for the store nearest you.

**GOODYEAR**  
CHEMICALS



C94-980-79-NP 0552  
1/2 page 6&w bid  
Std 8 3/16 x 5 1/2  
Lm 7 7/16 x 4 1/2  
Family Handyman—  
How To—Nails

N W Ayer & Sons International

# Plio-Nail. Tough as nails.



New Goodyear Plio-Nail<sup>®</sup> panel adhesive develops sufficient strength to hold a 4 x 8 panel firmly in place—even without nails.

You can use this remarkable new adhesive to bond wall panels, dry wall, hardboard, corkboard or foam insulation to masonry, studs,

subfloor, drywall or concrete.

Plio-Nail goes on easily in one step. Eliminates finishing work on dry wall. Sets automatically. And eliminates nail pops.

Goodyear Plio-Nail panel adhesive is available in stores everywhere. Stick with

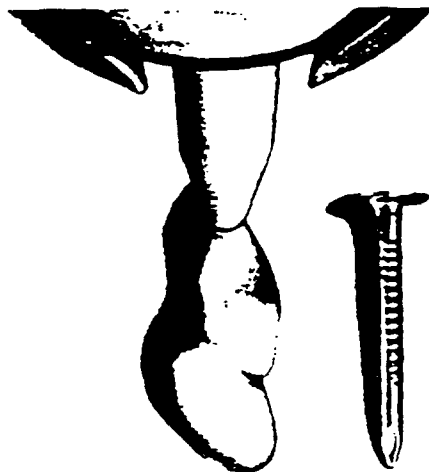
## GOODYEAR

GOODYEAR PRODUCTS COMPANY, Akron, Ohio 44316  
© 1974 Goodyear

**Plio-Nail.  
Tough  
as nails.**

**New Goodyear Plus-Nail™**  
panel adhesive develops sufficient strength to hold a 4 x 8 panel firmly in place—even without nails. Bonds wall panels, dry wall, hardboard, corkboard or foam insulation to masonry, studs, subfloor, drywall or concrete. Goes on in one step. Shims automatically. Eliminates nail pops. Available in stores everywhere. Stick with it.

[illegible]

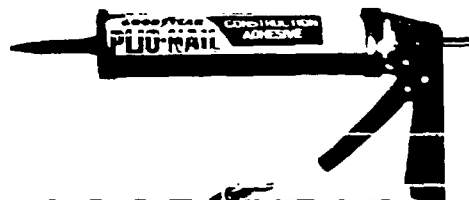


# Plio-Nail vs. The Nail

Goodyear Plio-Nail™ construction adhesive is designed for tough sub-flooring and joist work. Plio-Nail® panel adhesive is for drywall and paneling installations.

Plio-Nail bonds tight to eliminate some of the headaches caused by nails. With Plio-Nail there's no worry about nails popping, squeaking joints or finishing work on drywall. Plio-Nail is fast, easy and strong for both paneling and construction. Both types meet tough building code and HUD requirements.

Look for the Goodyear blimp display hanging in your store. That's where you'll find Plio-Nail adhesives. Tough as nails.



**GOODYEAR**  
CHEMICALS

# Plio-Nail, by Goodyear.

## It just might make the nail obsolete.

They just might be some of the hottest-moving items in your inventory this year, too!

Reason: panel and construction adhesives are really catching on with consumers. They're learning how and where to use them—from big jobs, like flooring and paneling, to minor repairs. And they know how easy and fast—even fun—adhesives are to work with.

This accomplished, which adhesives do they choose? Plio-Nail! Because they've seen Plio-Nail advertised in major, national do-it-yourself magazines. And because they recognize and trust the Goodyear name.

Your in-store display is

another grabber!

Customers can test Plio-Nail adhesives' tough bond using their own strength... they literally sell themselves! Not surprising, because Plio-Nail construction adhesive has passed tight building codes and meets all requirements of AFG-01 and HUD-FHA Use-Of-Materials bulletin #60.

Finding Plio-Nail adhesive in-store?

Only Goodyear gives you draw power like this—a large, blow-up blimp to “fly” over your merchandiser.

It's one of America's best-recognized symbols of quality!

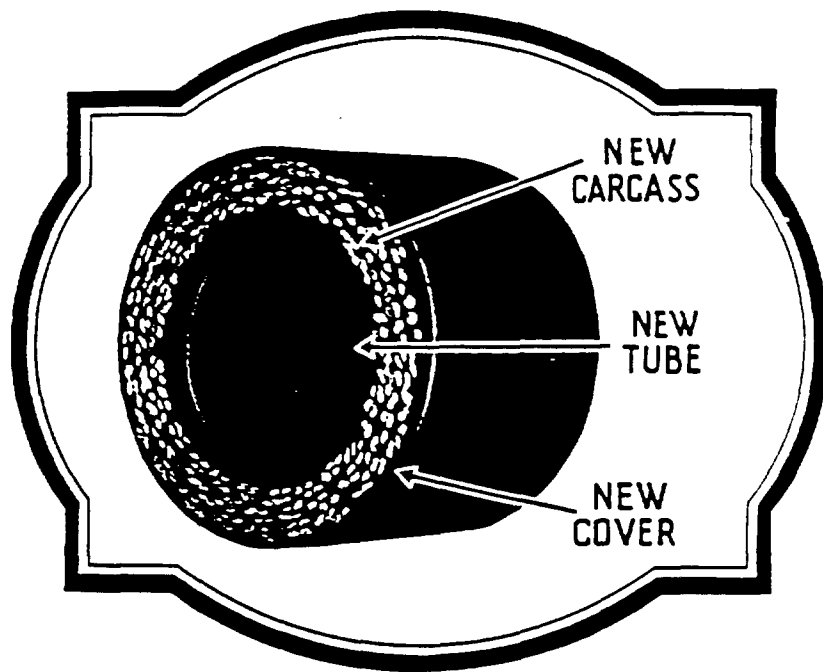
Call your Building Material Distributor representative for full promotion package, display, and stock.

Fix-up time is Plio-Nail time.

A “clean-up” opportunity for you!



**GOODYEAR**  
CHEMICALS



## NOW, A NEW GOODYEAR ASBESTOS CORD STEAM HOSE

*Another major development by Goodyear which shows you why this line of Mechanical Rubber Goods makes sales for you*

So far as existing materials permitted, Goodyear was making a fine steam hose. But Goodyear designers wanted a carcass stock that had higher resistance to steam under pressure. They found it in asbestos-treated cord. Then they built a cover and tube

to measure up to the stubborn life of the new material.

The tube of this new Goodyear Asbestos Cord Steam Hose has proved by test that it has 12 times greater resistance under pressure and heat to hardening, cracking, blistering, and swelling than the best cotton-fabric steam hose. The carcass of the new hose — the "weakest link" in ordinary hose — has 5 times better than normal resistance to heat and flexing. The cover has

strength and toughness fully equal to tube and carcass — an expert Goodyear production for an exacting job.

There are constant new developments in the line of Goodyear Mechanical Rubber Goods. A searching development policy makes business for the Goodyear dealer. Find out about the Goodyear franchise. For complete information, write to Goodyear, Akron, Ohio, or Los Angeles, California.

THE GREATEST NAME IN RUBBER

**GOODYEAR**

BELTS • MOLDED GOODS • HOSE • PACKING

*2 more in this*

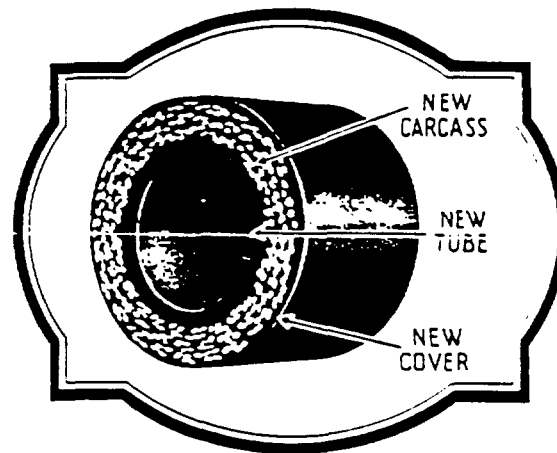
Jim -- I received the promotional sleeves from you. Received this morning. I have not seen the sleeves before. I am glad to hear and thought you might be interested.

Jean Henderson  
11-1-31

POWER, SEPT. 3, 1931

SOUTHERN POWER JOURNAL, OCT. 1931

## Guarded with ASBESTOS!



*a new Goodyear Asbestos Cord Steam Hose  
with unusual resistance to heat and pressure*

STEAM hose can become a pretty costly item around power houses. Under the combined effects of heat and pressure the poorer grades go to pieces fast. And until recently, even the best grades of cotton-fabric steam hose had a tough road to travel.

Now, by the introduction of a famous heat-resisting material, Goodyear has made a steam hose with many times the service life of old-fashioned

hose. Asbestos is the material. It is woven into the carcass of the hose in the form of Y-REINFORCING. Three double braids are utilized which give the new hose more than 5 times normal resistance to heat and flexing. The tube is 12 times greater resistance to pressure and heat than the old cracking, blistering, and scaling tube. The cover is 2 times stronger and toughness built up to the hard-

est work you can put it to. Goodyear Asbestos Cord Steam Hose is fine modern hose to save money for you in boiler cleaning and on other jobs about the plant. The G.T.M.—Goodyear Technical Man—will show it to you. Steam, Welding, Air, or Water Hose—you should have the special Goodyear toughness. Just write to Goodyear, Akron, O., or Los Angeles, and ask the G.T.M. to call.

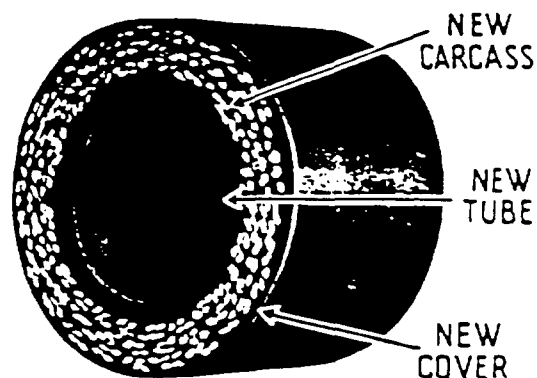
THE GREATEST NAME IN RUBBER

# GOOD YEAR

BELTS • MOLDED GOODS • HOSE • PACKING

**BOTH THE  
LATEST  
AND  
GREATEST  
IN RUBBER**

*The newest success in steam hose  
—Goodyear Asbestos Cord*



**G**OODYEAR is not only the Greatest Name in Rubber. Goodyear means the latest, tested, proved successful developments in rubber.

Aware that industry is constantly changing, improving its processes, Goodyear engineering and Goodyear manufacturing keep fully abreast of the new requirements with new developments in Goodyear Mechanical Rubber Goods.

The result is that industries of all types where rubber is used are confidently looking to Goodyear for the latest and best.

This creates a constantly growing demand for the scores of better mechanical rubber goods that bear the Goodyear name. The Goodyear franchise opens the door to this growing market. Investigate it. A line to Goodyear, Akron, Ohio, or Los Angeles, Calif., will bring full information.

***Latest Goodyear  
developments in  
Mechanical Rubber  
Goods***

- The Goodyear COMPASS  
Endless Belt
- The Goodyear THOR Belt  
Seamless
- The Goodyear COMPASS  
Cord Oil Well Belt  
— DOUBLE
- The Goodyear Emerald  
Cord Air Hose
- The Goodyear Emerald  
Cord Hy-Pressure  
Water Hose
- The Goodyear Asbestos  
Cord Steam Hose

**TUNE IN:**

Goodyear invites you to hear  
John Philip Sousa and his Band  
... Arthur Pryor and his Band  
... Revelers Quartet and Goodyear  
Concert-Dance Orchestra ...  
every Wednesday and Saturday  
night, over N. B. C. Red Network,  
WEAF and Associated Stations

THE GREATEST NAME IN RUBBER

**GOOD YEAR**

BELTS

MOLDED GOODS

HOSE

PACKING

# Goodyear Durability:

**The SCL-2 brake stands up to rugged operating conditions with low cost per hour of operation.**

After perhaps the most extensive and difficult test program any brake has ever been subjected to—Clark Equipment Company selected Goodyear brakes for their Model 175 front-end loader.

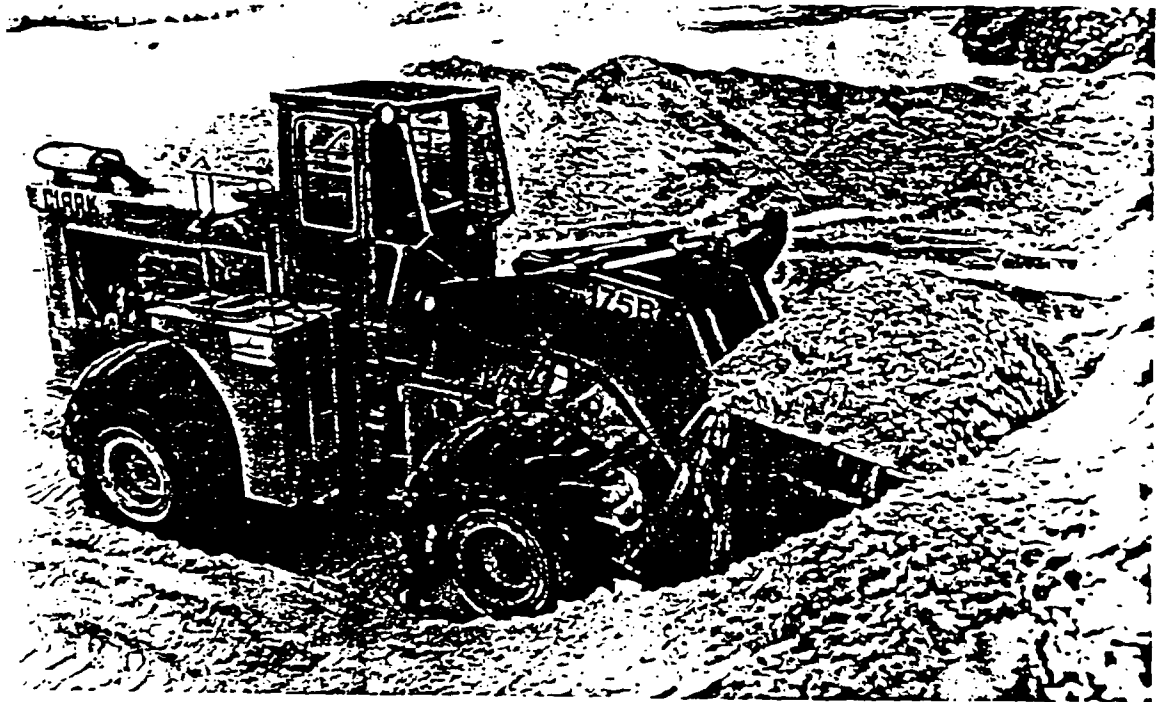
And what a test program it was. Only after two years of laboratory testing—stress coat, strain gage, cycle at 2300 psi, cycle-torque, thousands of stops on the dynamometer at disc temperatures up to 700° F, and many more—did Clark allow the brake to be field tested.

Field test locations and operations were picked as being the most adverse available. An addi-

tional two years of operating in sand, gravel, rock, chemicals and snow proved Goodyear's SCL-2 to be the most consistent low cost per hour of operation, outlasting competition by a wide margin.

When you face difficult braking requirements, turn to Goodyear. For complete information, call Jim Evans, Marketing Manager, Industrial Brakes, Goodyear Aerospace Corporation, P.O. Box 427, Berea, Kentucky 40403, (606) 986-9381.

**We know how  
to make things work.**



**GOODYEAR**  
INDUSTRIAL BRAKES

GY-AER-P00704C  
Pg 4 of 31d  
LM 7' x 10'  
Eng & Mining Jmtl — Feb 80

N W Ayer & Sons International

# If it moves, Goodyear can stop it.

It's a fact, that as a leader in disc brake technology, Goodyear can supply brakes to meet any requirement. We offer the broadest line of industrial disc brakes in the world today, with caliper sizes from 2½ lbs. to 300 lb. units. Any applications, large or small, truck or machine, Goodyear can do the job.

Disc brakes offer a variety of advantages over band and shoe brakes. They're compact and can perform in both static or dynamic applications with equal reliability. Their non-self-energizing characteristics assure smooth, controlled braking and superior control. The large exposed disc surface dissipates energy rapidly.

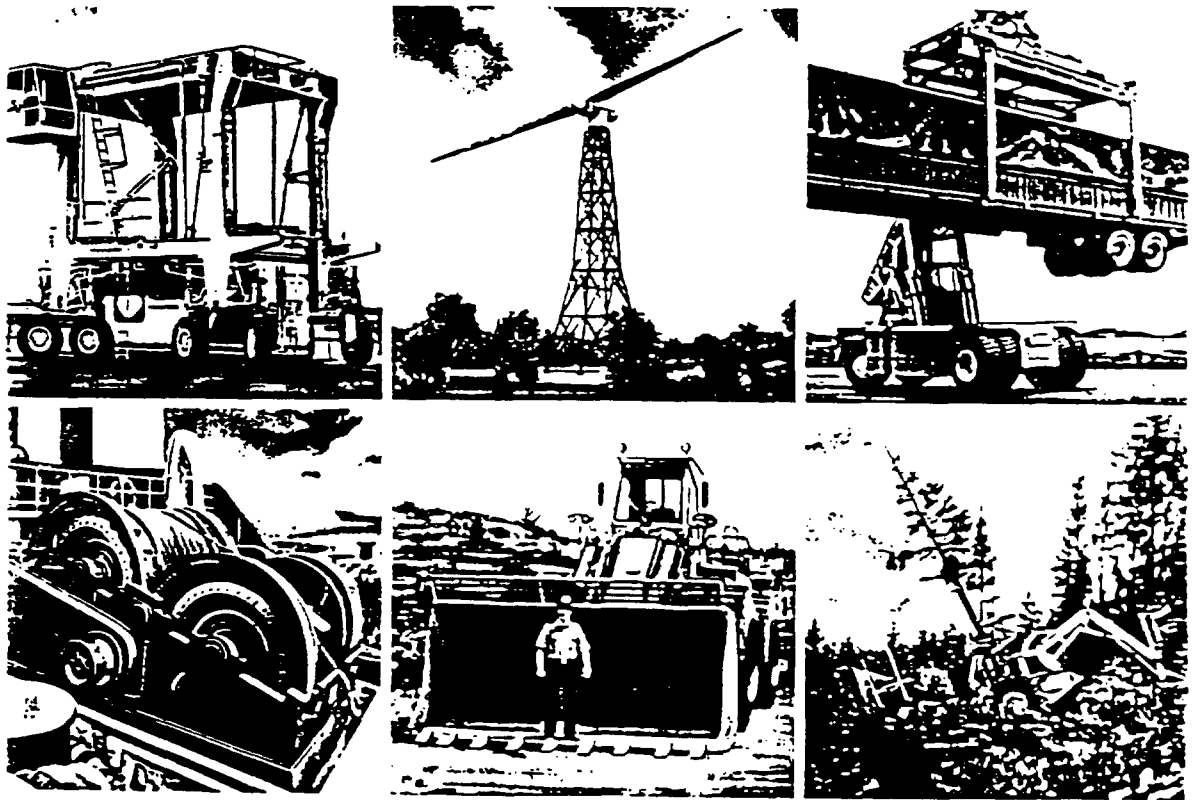
Goodyear develops and manufactures its own friction materials. Friction materials

that exhibit minimum fade at high temperatures and energy rates.

Chances are, you're probably using a Goodyear friction lining now. Doesn't it make good sense to come to the source and go Goodyear all the way.

A major plant expansion at our Berea plant puts us in a better-than-ever position to fill your needs. So if you make something that moves, call on us to stop it. Contact Stan Spencer, Product Manager, Industrial Brakes, Goodyear Aerospace Corporation, Glades Road, Berea, Kentucky 40403, (606) 956-9241.

**We know how  
to make things work.**



**GOODYEAR**  
INDUSTRIAL BRAKES

GOODYEAR  
Aerospace  
GY-AER-P10845  
Page—4/c—Bleed  
Industry Week—June 29, Aug. 24, 1981  
N W Ayer & Sons International

# Goodyear disc brakes. More efficient, more effective than band brakes under dynamic operation.

As a leader in disc brake technology, we supply brakes for bow thrust engines, propeller shafts, anchor windlasses, winches, as well as other uses.

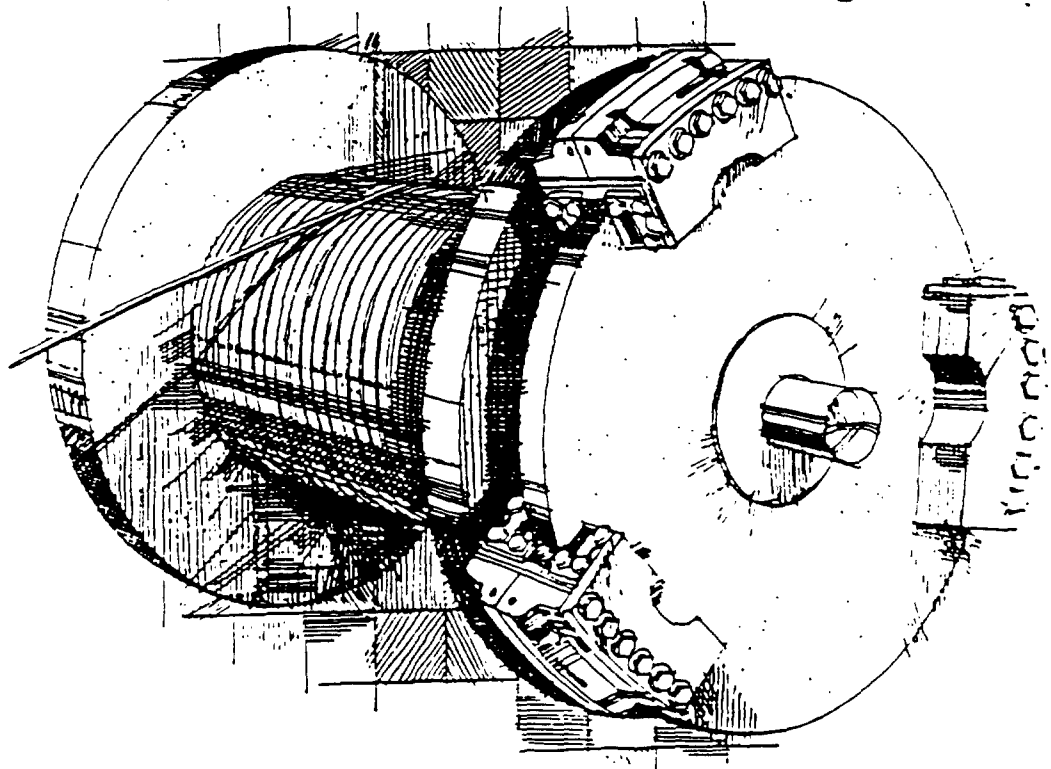
Disc brakes offer many advantages over band and shoe brakes. They are smaller. They can perform in both static and dynamic situations. Their non-self-energizing characteristic assures smooth, controlled payout and superior brake control. The large exposed disc surface dissipates more energy and heat.

Goodyear-manufactured friction materials exhibit minimum fade at elevated temperatures and high energy input rates. As the linings wear, pistons continually advance, keeping displacement constant for each application. Quick change lining design allows minimum downtime for replacement.

Our disc brakes are available in a complete line of caliper designs from 2½ lb. units to 300 lb. designs. Varying caliper multiples, disc thicknesses, operating pressures, etc., one brake caliper can be used across a complete product line.

Goodyear has been supplying brakes for aircraft, trucks and earth moving equipment for nearly fifty years. We can help you, too. For more information, contact Evans, (606) 936-9381 or write: Marketing Manager, Industrial Brakes, Goodyear Aerospace Corporation, Box 427, Berea, Kentucky 40403.

**We know how  
to make things work.**



**GOODYEAR**  
INDUSTRIAL BRAKES

GYAER-P10877  
Goodyear Aerospace  
Industrial Brakes  
Marine Winch Revise  
1 page D/W C/D  
Worklocat—Feb. Apr. Aug

N W Ayer ~~AMSI~~ International

# Goodyear Brakeability:

**Disc brakes, more efficient,  
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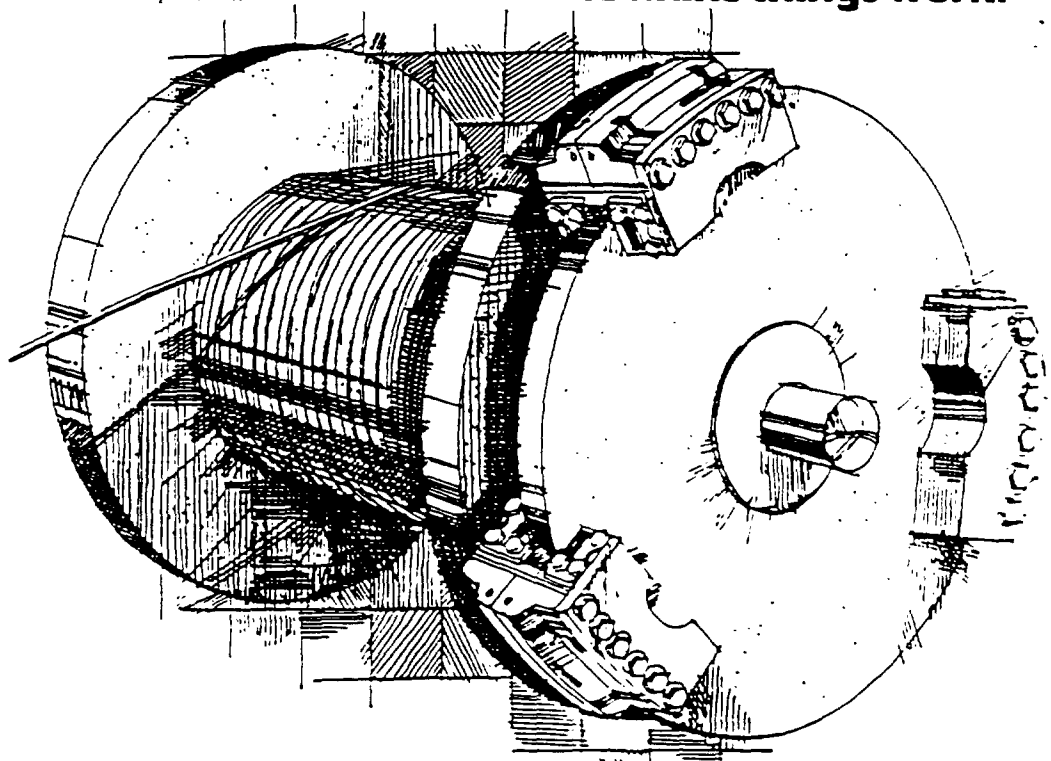
Disc brakes offer many advantages over band and shoe brakes. They are smaller. They can perform in both static and dynamic situations. Their non-self-energizing characteristic assures smooth, controlled payout and superior brake control. The large exposed disc surface dissipates more energy and heat.

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For complete information, call Jim Evans, Marketing Manager, Industrial Brakes, Goodyear Aerospace Corporation, Box 427, Berea, Kentucky 40403, (506) 936-9331.

**We know how  
to make things work.**



**GOODYEAR**  
INDUSTRIAL BRAKES

GY-AER-P00705

Jr. Pg. B.W Bid.

Bld: 8 x 11

LM: 7 x 10

Maritime Reporter—January 15, 1980

N W Ayer & Sons International

# BrakeAbility

**For marine applications,  
Goodyear disc brakes perform.  
Dynamically, statically...and economically.**

Goodyear disc brakes are available in a wide variety of sizes to meet the demands of power plants, from 100 to 10,000 horsepower, as well as other uses.

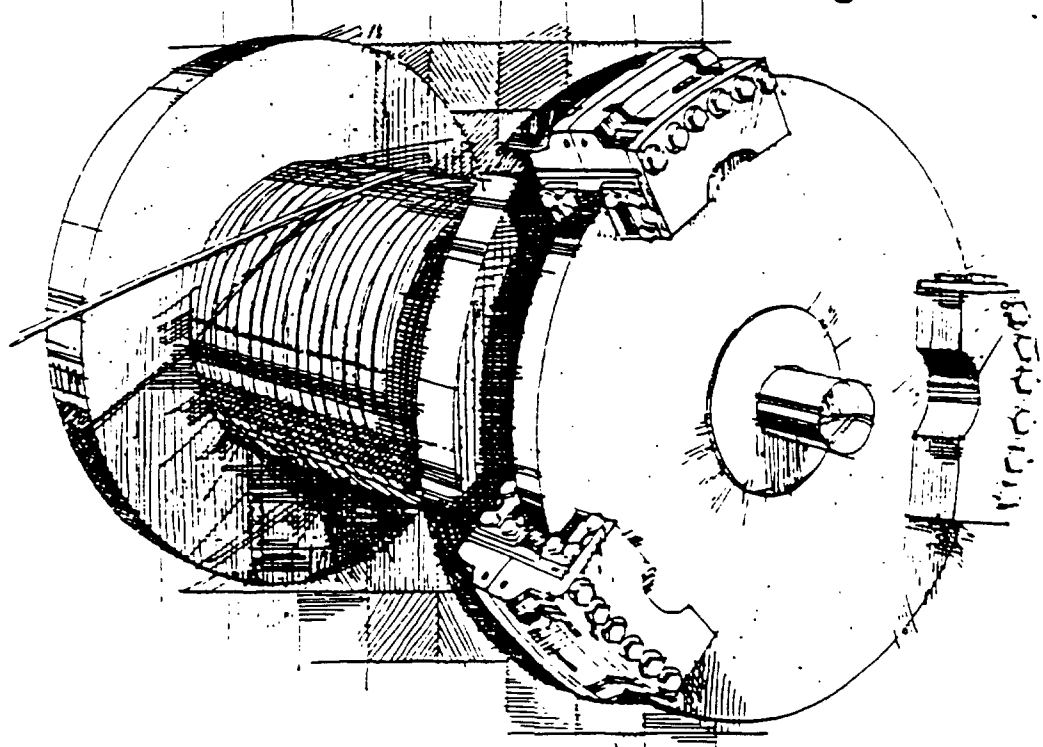
Goodyear disc brakes offer many advantages over other types of brakes. They are smaller, lighter and more efficient than other types of dynamic brakes. They are also more durable and require less maintenance. They are also more economical to install and operate.

Goodyear disc brakes are available in a wide variety of sizes to meet the demands of power plants, from 100 to 10,000 horsepower, as well as other uses. They are also more economical to install and operate.

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**We know how  
to make things work.**



**GOODYEAR**  
INDUSTRIAL BRAKES

GC-AEP-P90531

Jr. Pg. B W 50

Bld. 8 x 11

LM 7 x 10

Maritime Reporter—Sept. 1979

N W Ayer  International

# Tough Brakes.

## Goodyear outbrakes the competition in severe, big hauler tests.

When Canada recommended severe, new braking requirements, Unit Rig decided to compare competitive brake systems for use on their large Mark-Series trucks.

The test was a tough one: effectively stopping a vehicle weighing over 500,000 pounds, rolling down a 10% grade at speeds up to 25 mph.

The winner—Goodyear's SCL 19-2 brake. Three calipers mounted on a 40" disc in each front wheel provided

sufficient braking torque to decelerate the truck in stopping distances shorter than the proposed requirements, proving its superiority over all other braking systems.

Each of the three calipers is designed to develop over 1,000,000 inch-lbs. of torque at a hydraulic pressure of 3,000 psi. The Canadian tests used 75% of design torque.

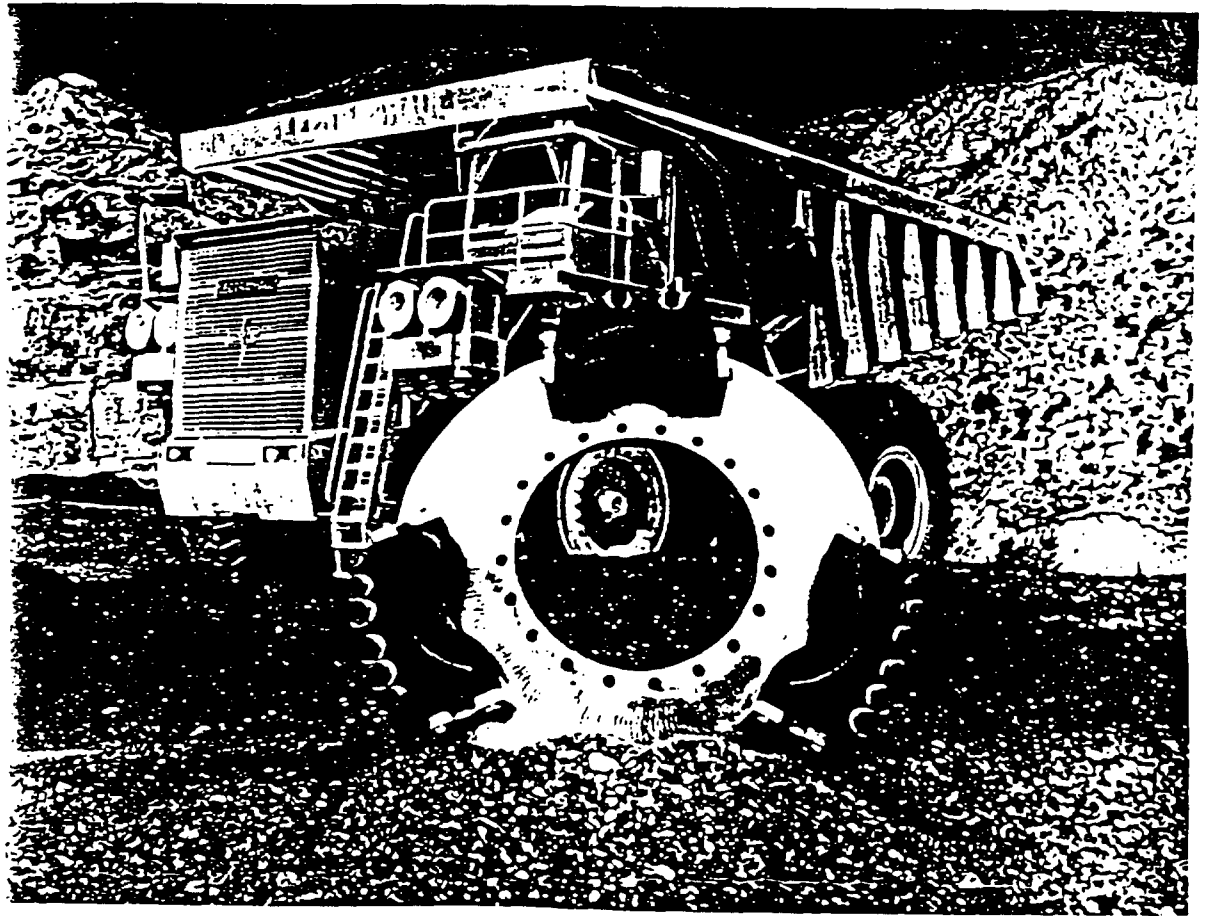
The lining material, specially developed and manufactured by

Goodyear, provides consistently high brake torque at severe energy rates with disc temperatures over 1000°F.

You should think about replacing your brakes with Goodyear's. We make more kinds of industrial brakes than anybody else.

To find out how about the one that's best for you by writing to: Goodyear Industrial Brakes, Box 407, Berea, Kentucky 40403. Or give us a call (606) 936-9351.

**GOODYEAR**  
INDUSTRIAL BRAKES



AD #094-900-77-HP-0027

To appear in:

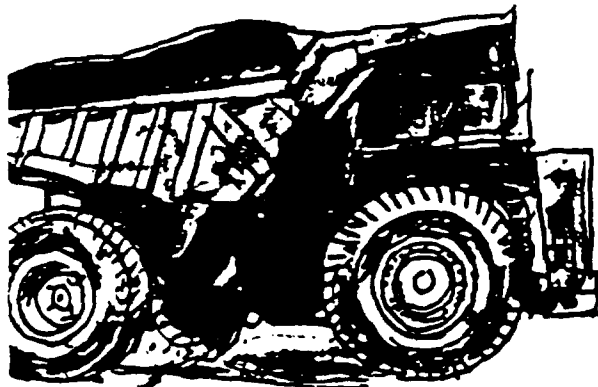
Engineering & Mining Journal - August

Page 4-clr bld.

8 1/2 x 11 1/8

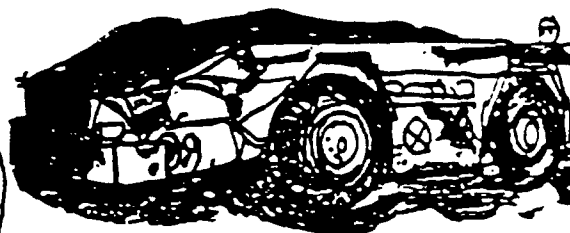
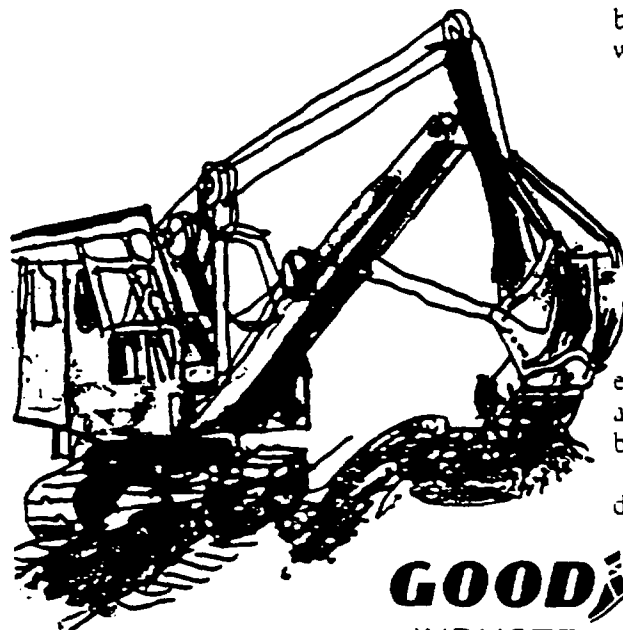
LM: 7 1/2 x 10 1/8

# brake problems, talk some torque with us.



Goodyear has the brakes to help dig you out from under the new safety standards requirements. Proven designs—with spring-applied hydraulic release—to meet torque demands up to 440,000 lbs/ins. And all of them meet OSHA's specifications for automatic parking and emergency brake features.

So, whether your problems are with shuttle-cars, shovels, trucks, loaders, whatever—in surface, sub-surface, or partial-water environments—when you need to solve brake problems, it's time to talk some torque with your Goodyear man.

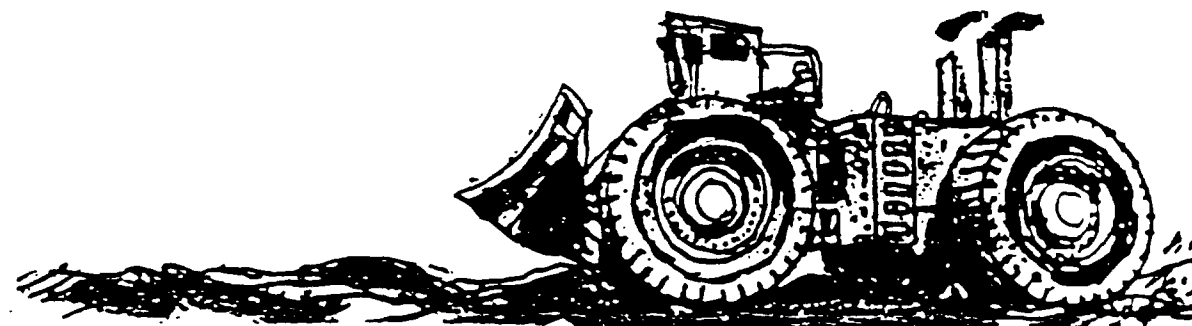


He'll tell you all about our full line of economical off-the-shelf disc-brake designs, and our total capability to meet all your future brake requirements.

Call or write him today. Goodyear Industrial Brakes, Berea, KY 40403. (606) 986-9351

## **GOODYEAR**

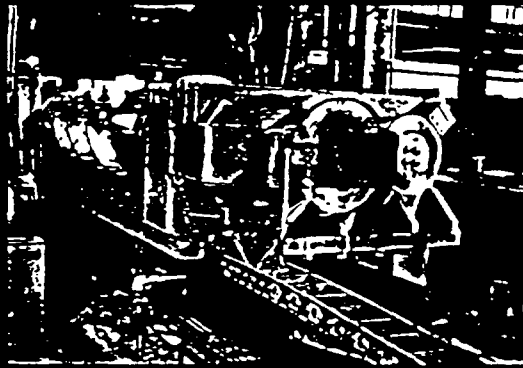
### INDUSTRIAL BRAKES



094-932-74-NP 0469-1 09. b/w bld. 8-5/16x11 5/16-Trade, 1974-C-54646-P-1-A-B-74-1A  
V W. Aver & Son, Inc. Engineering & Mining Journal

June  
August  
October

# Brake a 16-ton forging without a slip



Goodyear disc brakes hold 20-foot steel alloy slugs tight enough for rough cutting, then control rotation precisely enough for finishing cuts. Goodyear brakes are a sure thing. Goodyear Industrial Brakes, Dept. L-18, Akron, Ohio 44316.

**GOODYEAR**  
INDUSTRIAL BRAKES

LATHAM-LAIRD & KUDNER, INC.  
NEW YORK

No. 17-1545 Job PO-2603 17,390 4 Page, B&W, Vertical F  
Machine Design, December 18, 1969  
(Mechanical Drives Issue)

# Stop a Saturn rocket in its tracks



What does it take to stop the world's largest tracked vehicle, plus a giant Saturn V rocket, plus the rocket's whole launch tower? Only sixteen 32" Goodyear disc brakes. They have what it takes. Goodyear Industrial Brakes, Dept. L-18, Akron, Ohio 44316.

**GOODYEAR**  
INDUSTRIAL BRAKES

# Two small Goodyear disc brakes hold 16-ton forgings— without giving an inch.

Adamson United Company mills 20-foot alloy steel blanks into extruder screws—with the help of four Goodyear disc brakes.

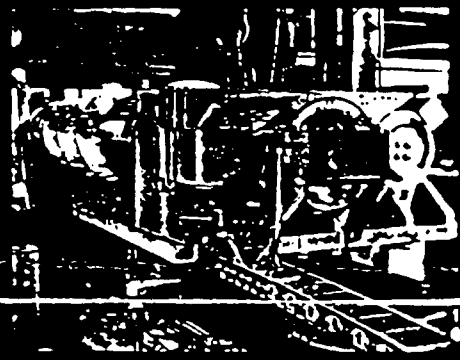
Two brakes lock the workpiece while the huge forgings are rough-cut under tremendous pressure. Two additional brakes control rotation of the workpiece for smooth finishing cuts.

Results? The compact size of the Goodyear brakes simplified the design of the milling machine headstock.

Their positive grip prevents slippage that could break tools and turn expensive forgings into scrap.

That's what Goodyear disc brakes are doing for Adamson United. What can they do for you?

Write Goodyear, Industrial Brakes, Dept. I-20, Akron, Ohio 44316.



**GOODYEAR**  
INDUSTRIAL BRAKES

# Tap your foot- and stop 60 tons.

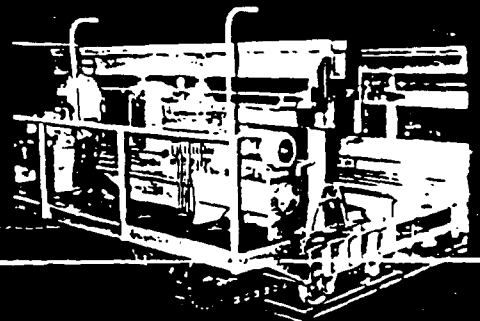
It used to take a brake pedal three feet long to stop a Star Foundry transfer car.

Now it takes only two Goodyear disc brakes—and no more effort than stopping an automobile. Even when the transfer car is carrying 60 tons of brick or pipe.

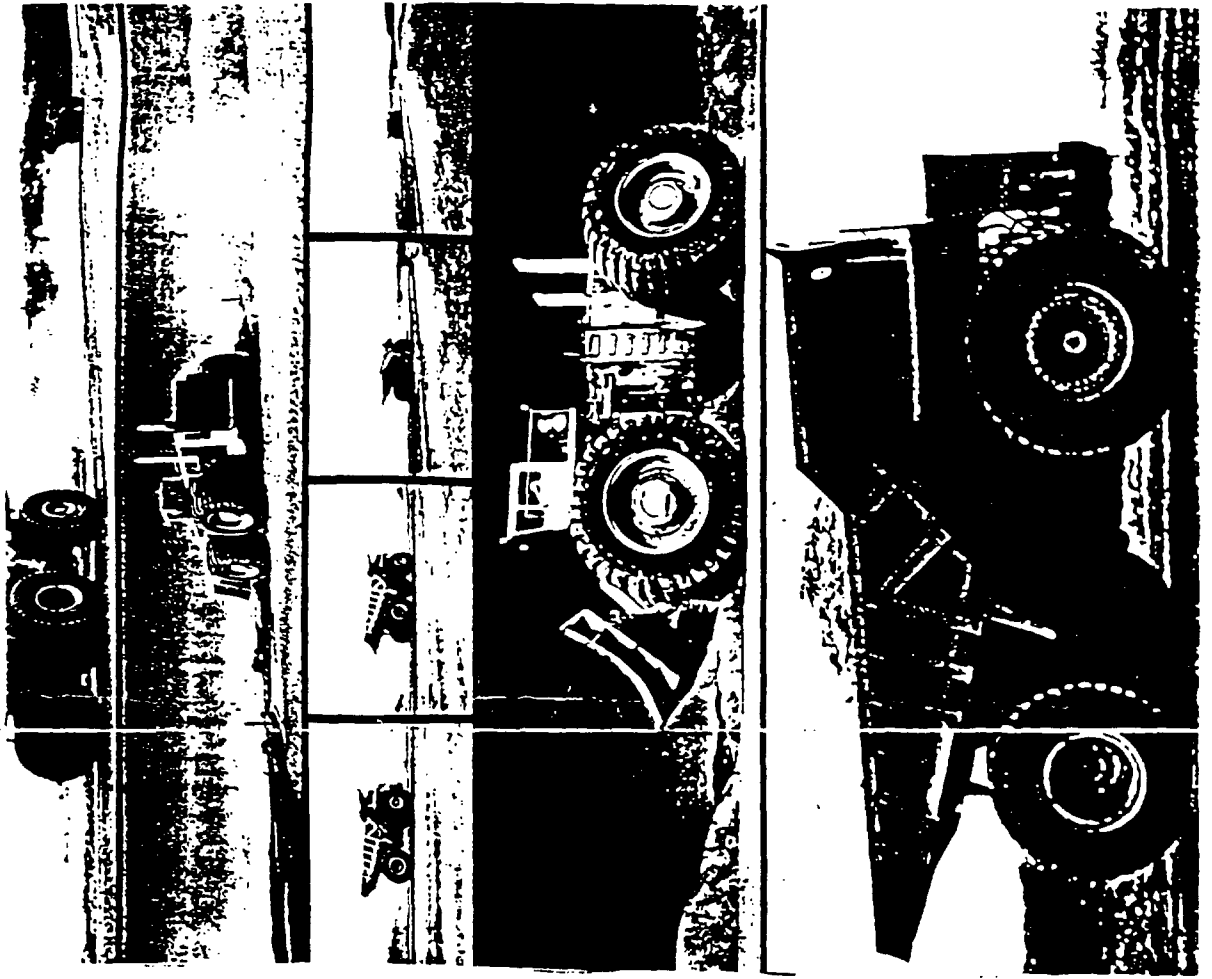
Maintenance is less work, too. No disassembly is needed to check the Goodyear brakes, because they can be inspected at a glance. And servicing requires just a few minutes.

Goodyear hydraulic disc brakes have what it takes at Star Foundry & Machine Co. See what they can do for you.

Write Goodyear, Industrial Brakes, Dept. H-18, Akron, Ohio 44316.



**GOODYEAR**  
INDUSTRIAL BRAKES



# A lot of good stops will start at Goodyear's new brake plant.

There's a new commitment at Goodyear. A commitment to develop and produce industrial disc brakes that offer you the best performance at the lowest possible cost. Our new plant in Berea, Kentucky, is a big step in that direction.

Everything about this new plant is directed to fulfilling the commitment.

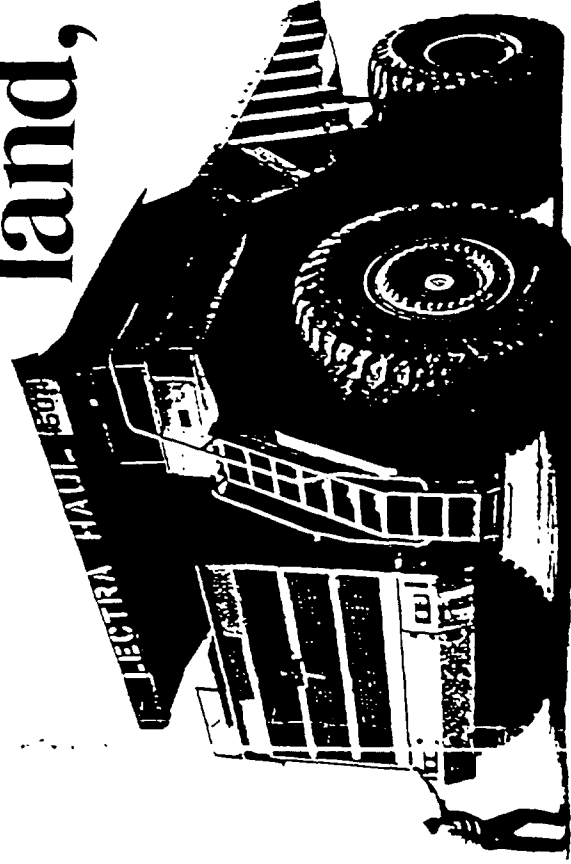
We're installing the most up-to-date equipment. We're staffing it with highly experienced engineers who have deep strength and expertise in designing industrial disc brakes for a variety of applications.

They will work with you to create a brake design that meet your specifications and provides optimum performance.

We would welcome the opportunity to work on your next brake problem. Write for our catalog that describes our complete capabilities. Goodyear Industrial Brake Operations, Dept. 0170, P.O. Box 427, Berea, Kentucky 40403.

**GOODYEAR**  
INDUSTRIAL BRAKES

# Goodyear has stopping power on land, water, underground.



Goodyear designed and built disc brakes for the world's largest off-highway truck. Our brakes are on an assortment of underground mining equipment including the shuttle car shown here. For a look into mine tunnels, we designed roller brakes that would stop a car under water when used on beach operations by the industry. And our roller brakes can be used on haulage trucks, too. Call your local Goodyear distributor for more information.



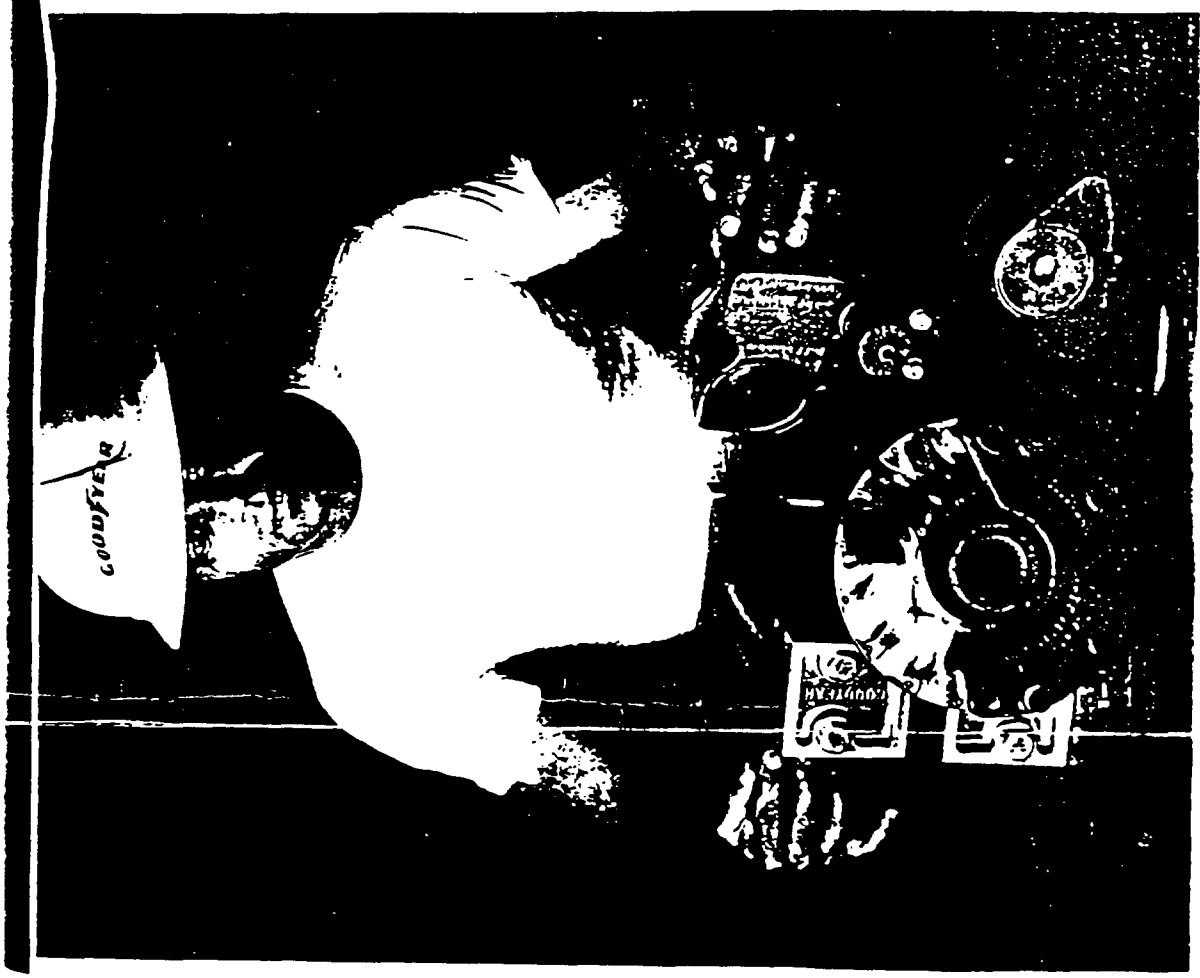
disc brakes for your equipment. Our new plant in Berea, Kentucky gives us even more design engineering and manufacturing strength. We can give you maximum value for your dollar.

Write to us about your brake requirements. And send for our catalog that describes our stopping capabilities. Goodyear

Industrial Brake  
Department, Dept. 006/  
P.O. Box 127, Berea,  
Kentucky 40004

**GOODYEAR**

INDUSTRIAL BRAKES



**Goodyear**

**helps you squeeze  
every ounce of torque  
out of your  
disc brake dollar.**

Goodyear helps you get more braking power for your money with the largest selection of low cost off-the-shelf disc brake assemblies in the industry, in designs and sizes for almost any torque requirement.

No need to buy expensive, custom made assemblies. We've got brakes for virtually every need; mine cars, construction equipment, trucks, tractors. We've even got a disc brake for underwater applications.

Goodyear has been in the forefront of disc brake technology for more than 35 years. We manufacture all our own linings. And, we have some of the finest test equipment available in the industry today, plus a full force of service engineers to handle any field problems.

That's how Goodyear can help you get the best value out of your disc brake dollar. To learn more, call or write Goodyear Industrial Brakes, Berea, KY 40003 (606) 986-9381.

**GOODYEAR**  
INDUSTRIAL BRAKES



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I am over the age of 18 years, employed in the County of Contra Costa, and am not a party to the within action. My business address is 1304 Willow Street, Martinez, CA 94553.

I served the following: THE GOODYEAR TIRE & RUBBER COMPANY's ANSWERS TO PLAINTIFFS' STANDARD INTERROGATORIES TO DEFENDANTS, GENERAL ORDER NO. 30.00 by placing true and correct copies thereof in an envelope, sealing, placing for collection and mailing following ordinary business practices, and addressed as follows:

I declare, under penalty of perjury, and under the laws of the State of California, that the foregoing is true and correct.

Linda King  
LINDA KING

**LINDA KING**

SOLANO PROOF OF SERVICE

ABEX CORPORATION  
Sullivan Roche & Johnson  
333 Bush Street, 18th Floor  
San Francisco, CA 94104-3559

THE BENDIX CORPORATION  
Gordon & Rees  
Embarcadero Center West  
275 Battery Street, 20th Floor  
San Francisco, CA 94111  
Attn: Michael Lucey, Esq.

BORG-WARNER CORPORATION  
McGlynn, McLorg & McDowell  
188 Embarcadero Center  
Suite 200  
San Francisco, CA 94105

THE CARLISLE CORPORATION  
Archer & McComas  
2900 Newall Hill Plaza  
Suite 300  
P.O. Box 8035  
Walnut Creek, CA 94596

FORD MOTOR COMPANY  
Lawrence A. Margoles, Esq.  
Barfield, Barfield, Dryden  
& Ruane  
One California Street  
Suite 3125  
San Francisco, CA 94111

GENERAL MOTORS CORPORATION  
John Krebs, Esq.  
Parichan, Renberg, Crossman  
& Harvey Corporation  
2350 West Shaw, Suite 130  
Fresno, CA 95115

INTERNATIONAL HARVESTER  
COMPANY  
Harrington, Fox, Dubrow,  
Canter & Keene  
611 W. Sixth Street  
9th Floor  
Los Angeles, CA 90017

KAISER ALUMINUM  
Daven G. Lowhurst, Esq.  
Thelen, Harrin, Johnson &  
Bridges  
One Kaiser Plaza  
Suite 1950  
Oakland, CA 94612

LEAR-SIEGLER, INC.  
HOPEMAN BROTHERS  
Robert M. Thompson Esq.  
Thompson & Michel  
3500 American River Drive  
Suite 101  
Sacramento, CA 95825

BABCOCK & WILCOX COMPANY  
Martin J. Everson, Esq.  
Anderson, Galloway & Luccchese  
1676 W. California Blvd.  
Suite 500  
Walnut Creek, CA 94596

UNIROYAL, INC.  
Leonard Cook, Esq.  
McNamara, Houston, Dodge,  
McClure & Ney  
P.O. Box 5288  
Walnut Creek, CA 94596-1285

UNIROYAL, INC.  
Nancy E. Hudgins  
Law Offices of Nancy E. Hudgins  
605 Market Street, Suite 700  
San Francisco, CA 94105

COMBUSTION ENGINEERING  
Rupert M. Ricksen, Esq.  
Knox, Ricksen, Snook,  
Anthony & Robbins  
1999 Harrison St., Ste. 1700  
Oakland, CA 94612

WESTERN MACARTHUR COMPANY  
Eugene Brown, Esq.  
Hardin, Cook, Loper,  
Engel & Bergez  
One Kaiser Plaza, Suite 2300  
Oakland, CA 94612

GARLOCK, INC.  
Glaspy & Glaspy  
201 W. Civic Center Drive  
Suite 245  
Walnut Creek, CA 94596

NICOLET INDUSTRIES, INC.  
Anthony Griffin, Esq.  
St. Clair, Zappetini,  
McFetridge & Griffin  
One Montgomery Street  
Suite 1400  
San Francisco, CA 94101

RAYMARK INDUSTRIES/CELOTEX/  
CAREY-CANADA  
Bjork, Fleer, Lawrence & Harris  
192 9th Street  
Oakland, CA 94607  
Attn: Robert Bjork, Jr., Esq.

Berry & Berry  
A Professional Law Corporation  
505 Fourteenth Street  
12th Floor  
Oakland, CA 94612

HAMILTON MATERIALS, INC./  
HAMILTON DISTRIBUTING  
Walsworth, Franklin & Bevins  
111 Sutter Street  
19th Floor  
San Francisco, CA 94104  
Attn: Helen H. Kong, Esq.

W. R. GRACE & COMPANY, INC.  
Clapp, Maroney, Bellgamba,  
Davis & Vucinich  
4400 Bohnannon Drive, Suite 100  
Menlo Park, CA 94025  
Attn: Eve T. Contente, Esq.

KAISER CEMENT CORPORATION/  
KAISER GYPSUM, INC.  
Michael Hoggard, Esq.  
Kincaid, Gianunzio, Caudle &  
Hubert  
200 Webster Street, Suite 200  
P.O. Box 1828  
Oakland, CA 94604

OWENS-CORNING  
John M. Ingle, Esq.  
Popelka, Allard, McCowan,  
Jones & Howard  
700 Ygnacio Valley Road  
Suite 330  
Walnut Creek, CA 94596

OWENS-CORNING  
Susan Bennett, Esq.  
Wright, Robinson, McCammon,  
Osthimer & Tatum  
44 Montgomery Street  
18th Floor  
San Francisco, CA 94104

KELLY MOORE PAINT COMPANY  
Kathleen S. Farley, Esq.  
Burnhill, Morehouse, Burford,  
Schofield & Blunden  
1220 Oakland Blvd., Suite 200  
P.O. Box 5168  
Walnut Creek, CA 94596

UNITED STATES MINERAL PRODUCTS  
Maureen Brooks  
Richard L. Reynolds, Jr., Esq.  
Bennett, Samuelsen,  
Reynolds & Allard  
1951 Webster Street, Suite 200  
Oakland, CA 94612-3466

THE SYNKOLOID COMPANY  
Branson, Fitzgerald & Howard  
P.O. Box 2189  
643 Bair Island Road  
Suite 400  
P.O. Box 2189  
Redwood City, CA 94064

EXCELSIOR  
Stumbos & Mason  
800 Ninth Street, Suite 200  
P.O. Box 868  
Sacramento, CA 95804

KELLY-MOORE PAINT COMPANY, INC.  
Bullen, McKone, McKinley, Gay  
Keitges & Pach  
Christopher Center  
1000 "G" Street, 5th Floor  
Sacramento, CA 95814-0884

SOLANO PROC OF SERVICE

JOHN CRANE, INC.  
McDonald, Cullom & Burland  
635 Sacramento Street  
Suite 720  
San Francisco, CA 94111

PARKER HANNIFIN  
Wilkes Morgan, Esq.  
Bronson, Bronson & McKinnon  
100 B Street, Suite 400  
Santa Rosa, CA 95401

THE FLINTKOTE COMPANY  
Landels, Ripley & Diamond  
450 Pacific Avenue  
San Francisco, CA 94133

H.K. PORTER  
Bogle & Gates  
1400 KOIN Center  
222 S.W. Columbia Street  
Portland, OR 97201  
Attn: Richard Hayden

THIOL CORPORATION  
Gilles & Nicora  
1900 Embarcadero, Ste. 300  
Oakland, CA 94606  
Attn: Timothy J. Minor, Esq.

PLANT INSULATION  
Tarkington, O'Connor &  
O'Neill  
Spear Street Tower  
One Market Plaza, 41st Floor  
San Francisco, CA 94105

CHRYSLER CORPORATION  
Crosby, Heafy, Roach & May  
1999 Harrison Street  
Oakland, CA 94612  
Attn: John Dittoe, Esq.

FIRESTONE TIRE & RUBBER  
~~Rooney E. Pryor, Esq.~~  
~~Erickson, Arbuthnot, Brown,~~  
~~Kilguff & Day~~  
1304 Willow Street  
Martinez, CA 94553

SACOMO MANUFACTURING COMPANY  
Wilkes Morgan, Esq.  
Bronson, Bronson & McKinnon  
100 B Street, Suite 400  
Santa Rosa, CA 95401

MANVILLE PERSONAL INJURY  
SETTLEMENT TRUST  
Ropers, Majeski, Kohn,  
Bentley, Wagner & Kane  
1001 Marshall Street  
Redwood City, CA 94063  
Attn: Daniel E. Alberti, Esq.

HOPEMAN BROTHERS  
Thompson & Heller  
3600 American River Drive  
Suite 150  
Sacramento, CA 95864

THORPE INSULATION  
Law Offices of Richard Hildebrandt  
757 West 9th Street  
San Pedro, CA 90731  
Attn: Richard Hildebrandt, Esq.

EAGLE-PICHER INDUSTRIES  
JACKSON, WALLACE & HAYDEN  
33 New Montgomery Street  
18th Floor  
San Francisco, CA 94105  
Attn: Gabriel A. Jackson, Esq.

RILEY STOKER CORPORATION  
Reba W. Thomas, Esq.  
Latham & Watkins  
633 West Fifth Street  
Suite 4000  
Los Angeles, CA 90071

E.J. BARTELLS  
Finan, White & Paetzold  
150 Spear Street, Suite 1725  
San Francisco, CA 94105

Law Offices of John Ladd  
1683 Folsom Street  
San Francisco, CA 94102  
Attn: John Ladd, Esq.

ACandS  
HASSARD, BONNINGTON, ROGERS  
& HUBER  
5 Fremont Center  
50 Fremont Street, Suite 3400  
San Francisco, CA 94104  
Attn: James N. Penrod, Esq.

Owens-Illinois  
MORGENSTEIN & JUBELIRER  
Federal Reserve Bank Building  
101 Market Street, 6th Floor  
San Francisco, CA 94105  
Attn: Laurie K. Anger, Esq.

MICHAEL P. STANLEY, ESQ.  
BROBECK, PHLEGER & HARRISON  
One Market Plaza  
Spear Street Tower  
San Francisco, CA 94105

BRAYTON & ASSOCIATES  
P.O. Box 2109  
Novato, CA 94948

SHIELD & SMITH  
580 California St., #1400  
San Francisco, CA 94104  
CCR