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AA-79-OH-01736

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OCT 18 1979
OWENS-CORNING
FIBERGLAS CORP.
LAW DEPARTMENT

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

GUY E. BELFI, et al.,	)	CASE NO. 79-003719
Plaintiffs	)	Judge Sam A. Zingale
-vs-	)	
JOHNS-MANVILLE SALES CORP., et al.,	)	PLAINTIFFS' INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT, OWENS-CORNING FIBERGLAS CORP.
Defendants	)	

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Plaintiffs, through their attorney, Timothy M. Bittel, and pursuant to the Ohio Rules of Civil Procedure and especially Rules 33 and 34, propound the following Interrogatories to the above-named defendant, to be answered by that defendant under oath, within twenty-eight (28) days of service hereof, and request that the defendant produce in accordance with Ohio Rule of Civil Procedure, Rule 34, at the office of Timothy M. Bittel, Ziegler, Metzger, Miller & Hoppe, 1670 Union Commerce Building, Cleveland, Ohio 44115, such documents as are identified in this request for production of documents within twenty-eight (28) days of service hereof.

As used in these interrogatories, the following words and terms shall mean and include the following:

1. "Defendant" refers to the named defendant to whom these interrogatories are propounded as identified in the caption of this document, and any predecessors by merger or acquisition, any contract units, any consultants, experts, investigators, agents, employees, or other persons acting on behalf of the defendant so identified.

2. "Plaintiffs" refer to the individuals named as plaintiffs in this case.

3. "Documents" includes all communications, any other written, printed, typed or recorded matter, including but not limited to, any document, paper, book, account, letter, photograph, tape recording, object,

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computer printout, microfilm, or other record retention device in the possession, custody or control of the defendant or any of his representatives, or known either to the defendant or any of his representatives.

4. "Identify" as the term is used herein shall have the following meaning:

(A) When identifying a person, to give such person's:

1. Full name;
2. Last known business adress and last known residence address;
3. Present or last known business affiliation, and position and business affiliation at the time in question.

(B) When identifying a document, to:

1. State the author thereof, any and all parties thereto and, if the case, the name of the person who signed the document;
2. State its title, number, code or other identifying data;
3. State the number of pages, if the documents contains more than one page;
4. Identify any attachments or supplemental items incorporated with the document;
5. State the date on which the document was prepared or, if not known, the approximate date;
6. State the date appearing on the document;
7. State the transaction, act or occurrence to which each document relates and the substance of the document;
8. State the general description of the document;
9. If the document was, but no longer is, in the possession of the defendant or subject to defendant's control, state what disposition was made of it;
10. State the names of the recipients of the original and every copy known to defendant;
11. State the subject matter of the document and further give sufficient identification to satisfy any requirement for identification or production of documents which defendant may require of this plaintiff in the future, in accordance with Rule 34 of the Ohio Rules of Civil Procedure;
12. Should the defendant deem any document requested to be identified herein to be privileged, defendant is requested to list such documents and to supply on such list, for each such document, the following information:

(a) The type of document, (e.g., letter, notebook, etc.);
(b) The date of the document;
(c) Identification of the author;
(d) Identification of the signatory or signatories of the document, if any;
(e) The location of the addressees of the document, if any;
(f) Identification of all persons shown as receiving or otherwise known to have received a copy of the document;
(g) The present whereabouts of the document and the name and address of the custodian thereof;

(h) A statement of the grounds on which the claim of privilege rests.

(C) When identifying an oral communication, to:

1. Identify the person who made the communication and the person to whom the communication was directed;
2. Give the date, time and place of the communication;
3. Give the contents of the communication in as verbatim a form as possible;
4. Identify any other persons present when the communication was made.

5. These Interrogatories shall be deemed continuing in nature, so as to require supplemental answers if the defendant obtains further information between the time answers are filed and the time of trial.

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1. When did the defendant first manufacture any product containing asbestos fibers of any type?

   May, 1958.

2. When did the defendant first sell any product containing asbestos fibers of any type?

   April, 1953.

3. Does the defendant now manufacture any product containing asbestos fibers of any type?

   No.

4. Does the defendant now sell any product containing asbestos fibers of any type?

   No.

5. Please identify each and every asbestos-containing product (including raw asbestos fibers) manufactured, sold, or distributed by the defendant since the year 1940 to the present time.

   This defendant did not sell asbestos containing insulation until 1953, and did not commence manufacture of such product until 1958. For products sold and/or manufactured see OCF Exhibit #30. This defendant did not mine or manufacture raw asbestos however this defendant did sell 889.3 tons of asbestos because of surplus or such products.

6. For each product identified in the immediately preceding interrogatory numbered 5, state the period or periods of time when each such product was manufactured, sold, or distributed by the defendant.

   See OCF Exhibit #30 (Product chart)

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7. If any of the products identified in response to interrogatory no. 5 have been discontinued by the defendant, state why such manufacture, sale, or distribution ceased, identify the products discontinued, and the dates of such discontinuance.

This defendant ceased the manufacture of asbestos containing products in November 1972 and the slae of such products in early 1973. This defendant ceased the manufacture of such product because of the desire to utilize it's own product-fiberglas as a component in insulation and also because of more definitive medical literature relative to asbestos inhalation and health.

8. For each product identified in response to interrogatory no. 5, give, by year-by-year basis commencing in 1940:

a) The total dollar volume of each product placed in the stream of commerce; and
b) The physical volume on a year-by-year basis placed in the stream of commerce, either by pound, numbers of cartons, or other consistent unit of physical measurement.

a-b) This information is not available. Defendant did not keep records for individual product sales.

9. For each product listed in response to interrogatory no. 5, state whether or not said product was ever sold or distributed:

a) In the State of Ohio;
b) Directly to the United States Government;
c) Directly to National Aeronautics & Space Administration of the United States Government.

a-c) Unknown at present.
See CCF Exhibit #35 (Kaylo Sales for 1958, 1959 and 1962-1972) excess of 100,000 invoices were found in defendant's storage warehouse and they are in the process of being indexed by "Who sold to" Where shipped," "dates" and "Amount" of insulation sold. This excersise is not expected to be completed until late December 1979 or early 1980. At that time we'll supplement answer.

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10. If your answer to any part of the immediately preceding interrogatory numbered 9 is in the affirmative, state:

I. The years each such product was sold or distributed:

a) In the State of Ohio;
b) Directly to the United States Government;
c) Directly to National Aeronautics & Space Administration of the United States Government.

II. The identity of each person or entity to whom each such product was distributed from the year 1940 to the present to:

a) In the State of Ohio;
b) Directly to the United States Government;
c) Directly to National Aeronautics & Space Administration of the United States Government.

III. The total dollar or physical volume of each such product sold to each identified customer:

a) In the State of Ohio;
b) Directly to the United States Government;
c) Directly to National Aeronautics & Space Administration of the United States Government.

I,II,III) See answer to #9.

11. With regard to each product identified in response to interrogatory no. 5, state:

a) The intended purpose of the product;
b) The intended method of application for each such product;
c) The intended method or manner of forming, shaping, or cutting or molding the product in field applications;
d) Describe any type of covering, wrapping, or other material intended to be applied in connection wich each such product; and
e) State whether each such product, at the time it left the control of the defendant, contained any trademark name or other identifying mark.

See attached sheet for answers.

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#11.

a.) Kaylo-Fyrcar. - The intended use for these products was for pipe, boilers, bulkheads, and doors or walls. SC-30 and SC40 - Cements could have been used alone or on existing layers of insulation on pipes or boilers.

b.) Kaylo-Fyrcar was manufactured in various sizes and thickness and when necessary it could be cut, sawed or routed. SC-30 and SC-40 was to be mixed with water and applied to prepared surfaces of pipes or boilers.

c.) See answer to "b" above.

d.) It was not necessary to covern or wrap the above described insulatio However if a customer chose to cover or wrap the insulation, it could be done.

e.) Above described products were packaged in corrugated cartons (SC-30 and SC-40 cements manufactured by Eagle Picher for OCF were packaged in bags) and the cartons bare defendant's trademark.

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12. From the date of first manufacture of asbestos-containing products by the defendant until the present time, did the asbestos products manufactured and/or sold by the defendant contain any caution, warning, caveat, or other statement or explanation on the product or its packaging?

    a) If so, when did the warning or statement first appear?
    b) What was the precise wording of the warning or other statement when it first appeared?
    c) Has the warning or statement been altered, amended, or changed in any manner? If so, how and when was it amended.

    a.) Yes. Kaylo products - 1967.
    Pyrcar products - 1970-71
    SC-30 and SC-40 Cements - 1964

    b.) See OCF Exhibits #13, 18, and 31.

    c.) This defendant ceased the manufacture of asbestos containing insulation in 1972, and the sale of such product in early 1973.

13. Do the asbestos products now manufactured and/or sold by the defendant contain any caution, warning, caveat, or other statement or explanation on the product or its packaging? If so, when did the warning or other statement first appear?

    This defendant ceased the manufacture of asbestos containing insulation in 1972; the sale of such product ceased in early 1973.

14. What now is the precise wording of the warning or statement? Where is it located on each product or packaging?

    See Answer to #13.

15. Please state if the defendant or anyone on behalf of the defendant ever conducted any studies or research to determine of the inhalation of asbestos fibers may be harmful. If so, please state:

    a) By whom the research was conducted, giving complete names and addresses;
    b) The dates and places that each such test was conducted;
    c) The complete results of each test or study, and pursuant to Rule 34, please provide a copy of each written report or other document indicating the results of each test or study.

    a-b) No. However please see OCF Exhibit #111 which is the Owens-Illinois, Saranac Lake Material obtained by outside counsel at the taking of a deposition in May, 1979.

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16. Did the defendant itself or through any insurance carrier, conduct or otherwise engage in, sponsor, or pay for studies at the Edward L. Trudeau Foundation and/or the Saranac Laboratory in Saranac Lake, New York, any time since defendant first manufactured and/or sold products containing asbestos. If so, please provide the details of periods of time that defendant and/or its insurance carrier conducted and/or participated in or sponsored such work and the results of any such findings of the studies conducted with respect to the relationship between the inhalation of asbestos dust and fibers and any resulting pulmonary pathologies. Further, pursuant to Ohio Rules of Civil Procedure, Rule 34, please provide a copy of any and all written reports relating to such studies, and any and all correspondence relating to such studies.

No.

17. Please state if the defendant or anyone on behalf of the defendant ever engaged in any research of asbestos fibers and their effect, if any, on persons coming in contact with the asbestos fibers. If so, please state:

a) The names and addresses of the individuals or groups engaged in such research;
b) The complete results of such research;
c) What recommendations, if any, were made as a result of said research;
d) If either the results or recommendations of such research were written, please, pursuant to Ohio Rules of Civil Procedure, Rule 34, produce copies of all such written documents.

No.

18. Please state the names and addresses of the defendant's chief medical officers from the date when defendant first manufactured any asbestos-containing products until the present time, listing the periods of time each such medical officer was employed by the defendant in that capacity.

This defendant did not commence the manufacture of asbestos containing insulation until 1958 and hired it's first medical director January, 1968 and he remains in that position. His name is
Dr. Jon L. Konzen
OCF
Fiberglas Tower
Toledo, Ohio 43659

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19. Please state to whom in the corporate structure each such previously identified chief medical officer reported or reports, and also give that person's position or job title with defendant.

Dr. Jon L. Konzen reports to R.A. Yudkin, Senior Vice President.

20. Please state the duties and responsibilities of each such corporate chief medical officer employed by the defendant.

The duties and responsibilities of defendant's corporate medical Director are to plan, organize, and direct medical programs for the employees in the operations of OCFC.

21. Did any medical officer ever employed by the defendant make, at any time, any recommendations and/or suggestions to the defendant pertaining to the risks or hazards to persons involved in the manufacturing or use of asbestos products? If so, please state:

a) When were such recommendations and/or suggestions made;
b) To whom were such recommendations and/or suggestions made;
c) By whom were these recommendations and/or suggestions made;
d) The substance of the recommendations and/or suggestions.

This defendant is presently reviewing records and when review is complete this defendant will supplement.

22. From the time the defendant first began manufacturing or selling products containing asbestos, please identify any and all organizations, groups, inter-company or industrial organizations to which the defendant belongs or belonged which conducted studies or researched the relationship between exposure to asbestos dusts and fibers, and specifically those asbestos-containing products manufactured by the defendant, any any resulting pulmonary pathologies.

None to the present knowledge of this defendant.

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23. In reference to the immediately preceding interrogatory numbered 22, please state:

a) The type or nature of the studies;
b) When the studies were conducted;
c) The complete results of the studies;
d) The recommendations of the studies;
e) The manner in which the recommendations were implemented by the defendant;
f) The date when first implemented.

N/A

24. Please state whether the defendant has a department, division, or section devoted to scientific and/or medical research during that period when the defendant first manufactured any asbestos-containing products until the present time. If so, please state when it was first formed.

No.

25. Please identify the scientific and medical periodicals to which the defendant, its medical department and its department of industrial hygiene subscribed during the period when defendant first manufactured any asbestos-containing products until the present time.

See attached sheet for the list of medical department and industrial hygiene department subscriptions.

26. Has the defendant, for the period 1940 to the present, manufactured, sold or distributed any asbestos-containing products under any tradenames, brandnames, or registered trademarks? If so, please state:

a) The name or tradename and with whom it was registered, and when.

a) This defendant did not commence the manufacture of asbestos containing insulation until 1958
Kaylo- OCF - 1958 (after purchase of Berlin, New Jersey Plant from O-I in 1958)

Pyrcar - OCF - 1958 (after purchase of Berlin, New Jersey Plant from Unarco in 1970)

Hy-lo - Tradename of Eagle-Picher

Armaglas - Tradename of Armstrong Cork

SC-30 and SC-40 - Cement re-branded for OCF by Eagle Picher Origin of brand name unknown at present.

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This list is as follows:

Journal of Occupational Medicine
Industrial Hygiene Digest (Literature Abstracts)
American Industrial Hygiene Association Journal
Journal of Occupational Safety and Health
New England Journal of Medicine
The Medical Letter
Archieves of Environmental Health
Occupational Safety and Health Reporter (BNA)
Chemical Reporter (BNA)
Journal of the American Medical Association
American Journal of Public Health
Archieves of Internal Medicine
British Journal of Industrial Medicine
The Medical Clinics of North American

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27. From the period 1940 until December 31, 1977, please identify all distributors of defendant's asbestos-containing products in Cuyahoga, Summit, Lorain, Lake, and Geauga Counties, Ohio.

Unknown if defendant had distributors in above named counties, however discovery continues.

28. Please state whether any of the distributors identified in the immediately preceding interrogatory were provided with any special instructions, oral or written, in regard to the use or application of defendant's asbestos-containing products. If so, please state:

a) When these instructions were given;
b) By whom these instructions were given;
c) Were the instructions oral or written;
d) The precise content of the instructions;
e) If the instructions were written, please, pursuant to Ohio Rules of Civil Procedure, Rule 34, produce a copy of such instructions.

N.A.R.

29. From the period 1940 until December 31, 1977, please identify all persons or entities in Cuyahoga, Summit, Lorain, Lake, and Geauga Counties, Ohio, to which the defendant directly sold asbestos-containing products.

See OCF Exhibit #35. Presently this is the only sales information available However, we are in the process of indexing in excess of 100,000 invoices (found recently in defendant's storage warehouse) as to "who sold to", "where shpped", "how much" sold and "volume." This excercise is not expected to be completed until late 1979 or early 1980.

30. With regard to those customers identified in response to interrogatory no. 29, please state whether any of those customers so identified were provided with any special instructions, oral or written, in regard to the use or application of defendant's asbestos-containing products. If so; please state:

See answer to #29.

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a) When these instructions were given;
b) By whom these instructions were given;
c) Were the instructions oral or written;
d) The precise content of the instructions;
e) If the instructions were written, please, pursuant to Ohio Rules of Civil Procedure, Rule 34, produce a copy of such instructions.

a-e) See answer to #29.

31. For each product identified in response to interrogatory no. 5, please identify all promotional and advertising material used by the defendant with regard to the sales, distribution, or general promotion of each such product. Pursuant to the Ohio Rules of Civil Procedure and Rule 34, please produce copies of such documents.

See OCF Exhibit #36.

32. For each product identified in response to interrogatory no. 5, state:

a) The brandname of such product;
b) The generic name of such product;
c) The chemical formulation or composition of such product;
d) The intended use of such product;
e) The manner in which each such product was packaged when it left the defendant's control.

a) See OCF Exhibit #30 (Product chart)
b) Insulation for pipe-boilers, bulkheads, and doors and walls.
c) See OCF Exhibit #30.
d) See answer to "5" above.
e) Kaylo was packaged in corrugated cartons.
Fyrcar was shipped on wooden pallets wrapped in corrugated cardboard material secured with steel straps.

33. Has the defendant, for the period 1940 through December 31, 1977, ever manufactured, sold, or distributed ceiling tiles or ceiling material containing asbestos fibers of any type? If so, state:

a) The dates of such sale;
b) The brand or tradename of each such product;
c) The generic name of each such product.

a-c) No.

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34. Did the defendant, at any time from the period 1940 until and including December 31, 1977, recommend that its employees use respirators or any other type of safeguard when working with asbestos-containing materials? If so, please state and identify:

a) The date upon which such recommendation was first made;
b) The precise wording of such recommendation, and to whom it was made;
c) Has defendant ever supplied respirators or other safeguards to its employees, and is so, please identify the type of manufacturer and model number or name.

a) The date such recommendation was made is presently unknown. However there were signs posted in defendant's Berlin Plant walls and bulletin board indicating the areas that required the use of Respirators. Also it was made a part of the written rules in plant in 1971.
b.) Signs are no longer available that would indicate the precise wording except as in plant rule book dated 1971 - See OCF Exhibit #4. Plant workers
c.) Yes, defendant supplied respirators to plant employees however the name and model number is unknown at present. Discovery continues.

35. For the period 1940 through December 31, 1977, has the defendant maintained a contract unit or contract units? If so, please identify:

a) The name or names of each such contract unit, and their addresses.

See attached list of defendant's contract units and their addresses. This defendant did not have a contract unti until 1950.

36. State whether any employee, or surviving spouse of a former deceased employee, of the defendant or of defendant's contract unit(s) has ever made a claim under the workers' compensation laws of any state, province, or country wherein such employee or surviving spouse claimed that the employee suffered from or died because of mesothelioma, asbestosis, or any type of cancer, as a result of that employee or former employee's exposure to or work with asbestos or asbestos-containing products? If so, identify:

a) Each such claimant;
b) The date each such claim was first received by defendant or its contract unit(s);
c) The occupation of each such employee or former employee;
d) The identifying number and jurisdiction of each such claim;
e) The disease which was primarily involved in each such claim.

a-d) We have received copies of workmen's compensation cases from our Atlanta, Ga, defendant counsel and these cases in some instances apparently involve employees of our contract units. We cannot state that these are the only cases filed, however we do not want to lead plaintiff's attorney into believing that we have no information what so ever concerning contract unit workmen's Compensation Cases.

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#35

...N, OHIO — area code 216
2950 W. Market St., 44313 867-5770

...NY, GEORGIA — area code 912
1011 Worth Street, 31705 883-8317
1011 Worth Street, 31705 883-8315

...NY, NEW YORK — area code 518
10 Wolf Rd., Suite 233, 12205 459-2952
4284 Albany St., 12205 456-6383

...QUERQUE, NEW MEXICO — area code 505
3004 Menaul N. E. 87112 294-5511

...ORAGE, ALASKA — area code 907
1907 Post Rd., 99501 272-8425
1007 Post Rd., 99501 274-7568

...NTA, GEORGIA — area code 404
1505 Marietta Blvd., N. W., 30318 352-3290
17 Dunwoody Park, Suite 110, 30341 394-9475
1605 Marietta Blvd., N. W., 30318 355-6822
One Dunwoody Park Suite 115 30341 394-1627
One Dunwoody Park Suite 115 30341 394-4520
17 Dunwoody Park, Suite 110, 30341 393-4422
17 Dunwoody Park, Suite 113, 30341 394-8403

...MORE, MARYLAND — area code 301
Baltimore customers only call 792-4424
COLUMBIA, MD
9519 Berger Road, 21043 730-9300
9519 Berger Road, 21043 465-6555
RIVERDALE, MD
5711 Sunnis Ave., 20840 779-7878

...RACUSE, LOUISIANA — area code 504
5700 Fivnga Blvd., Suite 424, 70805 926-4718

...E, WASHINGTON — area code 206
515 116th Ave N E., Suite 101, 98004 455-6478

... NEW JERSEY — area code 609
P O Box 100, Jackson Rd., 08009 787-3300

...EHEM, PENNSYLVANIA — area code 215
3710 Schoenersville Rd., 18017 865-0427

...DGE, IOWA — area code 319
2535 18th St., Suite 4E, 52722 359-3524

... MONTANA — area code 406
P O Box 1501, 59103 252-8496

[redacted]
Bldg. Mgr. Group Sales Officer
Test to See Office
[redacted]
Regional Office
Cust Service Center
Cust Service Center
Cust Service Center

BIRMINGHAM, ALABAMA — area code 205
D P.O. Drawer 2749, 35208 785-5180
EK P.O. Drawer 2749, 35208 786-3481

BOISE, IDAHO — area code 208
OLE P.O. Box 128, 83701 342-9311

BOSTON, MASSACHUSETTS — area code 617
EVERETT, MASS.
D 61 Commercial St. 02149 389-3330
WELLESLEY HILLS, MASS.
G 60 Williams St., 02181 235-7540

BUFFALO, NEW YORK — area code 716
G 3343 Harlem Rd., 14225 832-1410

CHARLESTON, WEST VIRGINIA — area code 304
SOUTH CHARLESTON, W. VA.
EK 4151/2 "D" Street, 25303 744-2291

CHARLOTTE, NORTH CAROLINA — area code 704
E 1 Charlottetown Ctr., Rm 215,28204 372-7565
F 1 Charlottetown Ctr., Rm 215,28204 372-2097
D Box 16388 University Park Sta.,28216 394-4376

CHERRY HILL, NEW JERSEY — area code 609
Y 409 Marlton Pike, Suite 108, 08034 428-8590

CHICAGO, ILLINOIS — area code 312
ELK GROVE VILLAGE, ILL.
D 2339 Estes, 60077 439-5530
SKOKIE, ILL.
GH 9933 Lawler Ave., 60076 583-0100
Y 9933 Lawler Ave., 60076 [redacted]
B 9933 Lawler Ave., 60076 675-6540

CINCINNATI, OHIO — area code 513
EK 2200 Victory Parkway, 45206 281-1173
D P.O. Box 41045 45241 563-2323
K 2937 Exon Drive, 45241 563-4275
L 2937 Exon Drive, 45241 563-2323

CLEVELAND, OHIO — area code 216
[redacted] 5700 Rent Road, Suite 104, 44129 884-9440
SOLON, OHIO
[redacted] 32500 Solon Rd., 44139 248-0744

COLONIE, NEW YORK — area code 518
[redacted] 4284 Albany Street, 12205 456-6383

COLUMBIA, SOUTH CAROLINA — area code 803
F 2817 Millwood Ave., 29205 252-7036
E 2817 Millwood Ave., 29205 254-7913

COLUMBUS, OHIO — area code 614
G 3360 Tremont Rd., 43221 451-6470
[redacted] 1525 Bethel Rd. Box 20458 43220 457-2220
[redacted] Columbus Filter Service Warehouse
P O Box 27150, 43227 497-1555

CUMBERLAND, RHODE ISLAND — area code 401
[redacted] Diamond Hill Rd., Box 158, 02864 333-6071

DALLAS, TEXAS — area code 214
D 12330 Hillcrest Rd. Suite 218 75233 233-9241
[redacted] 12830 Hillcrest Rd., Suite 209, 75230 233-7645
C 13245 Branchview Lane, 75234 243-8042

DENVER, COLORADO — area code 303
EK 8000 E.Evans, Suite 360,Bld. 1, 80220 757-6127
AURORA, COLORADO
L 3390 Peoria St., Suite 304, 80010 344-3851

DES MOINES, IOWA — area code 515
WEST DES MOINES, IOWA
EK 1025 Ashworth Rd., Suite 464, 50263 223-1205

DETROIT, MICHIGAN — area code 313
OAK PARK, MICH.
GDL 15300 W. Eight Mile Rd., 48237 967-1300
Y 26200 Greenfield Ave., 48237 968-9500
TROY, MICHIGAN
T 2075 West Big Beaver Rd., 48084 643-9505
F 2075 West Big Beaver Rd., 48084 649-2288

ELKHART, INDIANA — area code 219
E 700 E. Beardsley Ave., 46514 262-1546
Y 1761 Conant St., 46515 294-3627

EVANSVILLE, INDIANA — area code 812
F 1151 Diamond Ave., Rm. E, 47717 425-5134

FLINT, MICHIGAN — area code 313
E G-4039 Dolan Drive 48504 787-9573
D G-4099 Dolan Drive 48504 787-2586
L G-4099 Dolan Drive, 48504 787-2531

FORT WAYNE, INDIANA — area code 219
G 4410 Executive Blvd., 46808 485-9552

FRESNO, CALIFORNIA — area code 209
[redacted] 1744 N. Maricopa, Box 111 93707 268-4193

GEORGETOWN, SOUTH CAROLINA — area code 803
[redacted] 701 Front St., Box 1298, 29440 527-9523

GRAND RAPIDS, MICHIGAN — area code 616
[redacted] 1059 36th St., S. E., 49508 452-8799
D [redacted] 1059 36th St., S. E., 49508 241-0181
[redacted] 1059 36th St., S. E., 49508 452-8801

GREENSBORO, NORTH CAROLINA — area code 919
G 1821 Langaw St., Box 9825, 27408 273-0528

GREENVILLE, SOUTH CAROLINA — area code 803
EK 101 Executive Center Drive, 29615 288-6450
F P O Box 5798, 29606 288-6412

HARRISBURG, PENNSYLVANIA — area code 717
E 900 Nationwide Dr. Suite 104, 17100 652-6503

HARTFORD, CONNECTICUT — area code 203
EAST HARTFORD, CONN.
D Box 8148, 06108 289-0217
BLOOMFIELD, CONN.
E 870 Cottage Grove Rd., 06002 243-8808
EK 600 Cottage Grove Rd., 06002 242-7796

HONOLULU, HAWAII — area code 808
EK 567 Halekauwila St., 96813 537-3722

HOUSTON, TEXAS — area code 713
GR 256 North Belt East, 77060 445-9100
L 4203 North Interstate 45 77018 [redacted]
D P O Box 328, 77001 869-6211

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[illegible]NAPOLIS INDIANA — area code 317
[illegible] Keystone Crossing, 46240* — 844-1625
[illegible] Expy Drive, 46219 — 895-1140

[illegible]SON MISSISSIPPI — area code 601
[illegible] Galaxie Drive, 39208 — [illegible]

[illegible]SONVILLE, FLORIDA — area code 904
[illegible] Woodcock Dr., Suite 109,32207 — 396-2220
[illegible] W. First St., Box 6797,32205 — 786-5480

[illegible]NSAS CITY KANSAS — area code 913
MISSION, KAN.
[illegible] Broadmoor, Suite 702, 66202 — 384-5555
OVERLAND PARK, KAN.
[illegible] W. 110th St., Suite 200, 66210 — 341-9100
SHAWNEE MISSION, KAN.
P.O. Box 2198, 66201 — 888-6600

[illegible]NSAS CITY MISSOURI — area code 816
[illegible] Macon St., 64116 — 842-6446
[illegible] Macon St., 64116 — 842-0181

[illegible]OXVILLE, TENNESSEE — area code 615
[illegible] Baum Drive, 37919 — 584-6161

[illegible]SING MICHIGAN — area code 517
[illegible] Alpine St., 48910 — 372-4300

[illegible]LETTE, NEW JERSEY — area code 201
P.O. Box 365, 38735 — 830-3600

[illegible]LE ROCK ARKANSAS — area code 501
[illegible] N. University, Suite 205, 72207 — 664-2133

[illegible]NGELES, CALIFORNIA — area code 213
[illegible] Telegraph Rd., 90040 — 724-5383
P.O. Box 60317, 70060 — 728-8166
ORANGE, CALIFORNIA — area code 714
[illegible] W. Katella Ave., 92667 — 633-2302

[illegible]SVILLE, KENTUCKY — area code 502
P.O. Box 18090, 40218 — 456-4230
P.O. Box 18047, 40218 — 459-6800

[illegible]BOCK, TEXAS — area code 806
7212 Joliet St., 79423 — 792-6279*
7212 Joliet St., 79423 — 793-0508

[illegible]CON, GEORGIA — area code 912
[illegible] Vineville Ave., 31211 — 742-7758

[illegible]EMPHIS, TENNESSEE — area code 901
[illegible] Ridgeway Loop Rd., 38138 — 761-4770
Box 18414, 38118 — 363-1830

[illegible]AMI, FLORIDA — area code 305
N. MIAMI BEACH, FLA.
[illegible] N. E. 163 St., 33179 — 651-2113
[illegible] N. E. 163 St., 33179 — 651-7671
INTERNATIONAL: see last page

[illegible]LWAUKEE, WISCONSIN — area code 414
[illegible] N. Mayfair Rd., Rm. 150, 53226 — 259-0700

MINNEAPOLIS, MINNESOTA — area code 612
BLOOMINGTON, MINN.
Twin Cities Service Warehouse
Y — 1 Apple Tree Sq., Suite 1792, 55420 — 854-8835
G — 1 Apple Tree Sq., Suite 1252, 55420 — 854-4994
NEW HOPE, MINN.
D — 5121 International Pkwy., 55428 — 535-1444

MOBILE, ALABAMA — area code 205
E — 900 Bel Air Blvd., Suite 166, 36608 — 478-5571

NASHVILLE, TENNESSEE — area code 615
ELLENWOOD, TENN.
EP — Two Maryland Farms, Suite 238, 37027 — 373-2723

NEWARK, NEW JERSEY — area code 201
HARRISON, N. J.
K — 43-57 Harrison Ave., 07029 — 484-3682
D — 43-57 Harrison Ave., 07029 — 484-6800

NEW ORLEANS, LOUISIANA — area code 504
KENNER, LA.
D — P.O. Box 997, 70063 — 721-7673
METAIRIE, LA.
EK — 3525 N. Causeway Blvd., 70002 — 837-2902

NEW YORK, NEW YORK* — area code 212
TYXX — 717 Fifth Ave., 10022 — 7593810
SCARSDALE, N. Y. — area code 914
G — 700 White Plains Rd., 10583 — 472-3400

NORFOLK, VIRGINIA — area code 804
EK — 5127 Virginia Beach Blvd., 23502 — 461-4114

OKLAHOMA CITY, OKLAHOMA — area code 405
EK — 3037 N.W. 63rd, Suite 203, 73116 — 848-8781
D — 4810 N. Cooper, 73118 — 525-2727

OMAHA, NEBRASKA — area code 402
E — 10407 Gwenshire, Suite 100, 68114 — 397-2972

ORLANDO, FLORIDA — area code 305
E — 541-543 W. Grant St., 32806 — 843-2432
G — 2021 Directors Row, 32809 — 859-1640

PHILADELPHIA, PENNSYLVANIA — area code 215
BERWYN, PA.
D — 592 W. Swedesford Rd., 19312 — 647-6110
L — 592 W. Swedesford Rd., 19312 — 647-6304
WAYNE, PA.
68 — 997 Old Eagle School Rd., 19087 — 688-6650
H — 907 Old Eagle School Rd., 19087 — 687-7020
K — 995 Old Eagle School Rd., 19087 — 293-0572

PHOENIX, ARIZONA — area code 602
EK — 3151 N. 16th St., Rm. P131, 85016 — 277-6217
LO — P.O. Box 6020, 85005 — 258-4341

PITTSBURGH, PENNSYLVANIA — area code 412
GN — Gateway Tower, Fort Duquesne Blvd., 15222 — 765-3750

PORTLAND, OREGON — area code 503
G — P.O. Box 2718, 97208 — 620-1014
MILWAUKIE, ORE.
Y — 5509 S.E. Int'l. Way, Suite C, 97222 — 653-8631
TIGARD, ORE.
G — 14101 S.W. 72nd Ave., 97223 — 620-1014
D — 14101 S.W. 72nd Ave., 97223 — 620-1010
L — 14101 S.W. 72nd Ave., 97223 — 620-1018

PROVIDENCE, RHODE ISLAND — area code 401
RUMFORD, R.I.
D — 9 Newman Ave., 02916 — 434-7437

RALEIGH, NORTH CAROLINA — area code 919
E — 3700 Old Wake Forest Rd., 27609 — 872-0823

RICHMOND, VIRGINIA — area code 804
E — 1905 W. Huguenot Road, 23235 — 794-4472

ROCHESTER, NEW YORK — area code 716
PITTSFORD, N.Y.
G — 11 State St., 15434 — 381-0340

SACRAMENTO, CALIFORNIA — area code 916
EK — 1041 Fee Dr., P.O. Box F, 95813 — 927-1896
D — P.O. Box F, 94080 — 927-1341
L — 1041 Fee Dr., P.O. Box F, 95813 — 927-1814
NORTH HIGHLAND, CALIF.
S — 4340 Roseville Rd., 95660 — 482-9201

ST. LOUIS, MISSOURI — area code 314
G — 1009 Executive Parkway, 63141 — 434-6510
MARYLAND HEIGHTS, MO.
D — P.O. Box 1008, 63043 — 432-375
L — 2462 Schuetz Rd., 63043 — 432-3750

SALT LAKE CITY, UTAH — area code 801
E — 540 W. 2600 South St., 84119 — 972-6518
D — 540 W. 2600 South St., 84119 — 972-1383

SAN ANTONIO, TEXAS — area code 512
G — 6631 Tradeway Rd., 78217 — 829-9929
L — P.O. Box 5316, 78208 — 223-4186
D — P.O. Box 758, 78293 — 222-9544

SAN BERNARDINO, CALIFORNIA — area code 714
D — P.O. Box 5266, 92408 — 875-7441
Y — P.O. Box 6346, 92412 — 824-2501

SAN DIEGO, CALIFORNIA — area code 714
L — P.O. Box 13188, 92112 — 234-0823
E — 501 Mace St., 92103 — 239-2300

SAN FRANCISCO, CALIFORNIA* — area code 415
SOUTH SAN FRANCISCO, CALIF.
G — 477 Forbes Blvd., 94080 — 873-7060
DL — 477 Forbes Blvd., 94080 — 873-7400

SANTA CLARA, CALIFORNIA* — area code 408
Y — 980 Central Expressway, 95052 — 247-1050
T — 980 Central Expressway, 95052 — 247-1515
K — 3333 Bowers Ave., Suite 190, 95051 — 986-6744

SCARSDALE, NEW YORK — area code 914
N — 700 White Plains Rd., 10583 — 472-3900
G — 700 White Plains Rd., 10583 — 472-3400
K — 700 White Plains Rd., 10583 — 723-0286

SEATTLE, WASHINGTON — area code 206
G — P.O. Box 80099, 98108 — 762-4750
D — P.O. Box 24077, 98124 — 763-2930
L — 13135 W. Hanselroi, 98134 — 623-4750

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SHREVEPORT, LOUISIANA — area code 318
E — Lane Bldg., 810 Marshall, Suite 702, 71101 — 222-7100

SPOKANE, WASHINGTON — area code 509
[illegible] — Spokane Ind. Park, Bldg. 5, 99216 — 924-5532
[illegible] — Spokane Ind. Park, Bldg. 5, 99216 — 924-6011
[illegible] — P.O. Box 2349, 99220 — 924-6011

SUMMIT, ILLINOIS — area code 312
[illegible] — 5618 Archer Rd., 60501 — 458-7750

SYRACUSE, NEW YORK — area code 315
[illegible] — 5858 E. Molloy Rd., 13211 — 455-5401
— — 455-6680
[illegible] — 5858 E. Molloy Rd., 13211 — 455-1071

TAMPA, FLORIDA* — area code 813
[illegible] — 4950 W. Kennedy Blvd. Suite 301, 33609 — 877-7515
[illegible] — 701 Mariner Sq., Suite 130, 33609 — 872-2757
[illegible] — Box 3327, 33601 — 247-4602

TOLEDO, OHIO* — area code 419
[illegible] — Fiberglas Tower, 43659 — 248-8101
[illegible] — Telex, Fiberglas Tower, 43659 — 248-8043
[illegible] — Pope & Mannoles, Fiberglas Tower — 248-8078

TULSA, OKLAHOMA — area code 918
[illegible] — 7030 S. Yale, Suite 204, 74136 — 492-3624
[illegible] — 5558 E. 42 St., 74145 — 627-1220

WASHINGTON, D.C. — area code 202
[illegible] — 900 17th St., 20006 — 296-3226
— GREENBELT, MD. — area code 301
EN — 9111 Edmonton Rd., 20770 — 345-7300

WHITING, WISCONSIN — area code 715
[illegible] — 2715 Post Road, 54481 — 341-0602

WICHITA, KANSAS — area code 316
E — 250 North Rock Rd., 67206 — 683-5804

OWENS-CORNING FIBERGLAS INTERNATIONAL GROUP
INTERNATIONAL ADMINISTRATION:
TOLEDO, OHIO 43659* — 419-248-8010
Fiberglas Tower

EXPORT SALES,
BAYAMON, PUERTO RICO, 00619
[illegible] AVE Las Vertudes — 809-787-7591

MIAMI, FLORIDA 33131* — 305-377-0974
[illegible] S E 2nd Avenue

NEW YORK, NEW YORK 10022* — 212-759-3810
[illegible] Park Avenue

TOLEDO, OHIO 43659* — 419-248-8010
Fiberglas Tower

EUROPEAN OFFICES
B-1170 BRUSSELS, BELGIUM
Owens-Corning Fiberglas Europe, S.A.
Chaussee de La Hulpe 178 — 02/672.22.20
Cable address: Fiberglas Brussels — Telex 22204

B-4651 BATTICE, BELGIUM (plant)
Owens-Corning Fiberglas Europe, S.A.
Route de Maestricht — 087/68.55.11
Cable address: OCF Bat — Telex 49107

ASCOT, BERKSHIRE SL5OPY, ENGLAND
Owens-Corning Fiberglas (UK) Ltd.
Crossways, Silwood Road — 0990/24889
Cable address: Fiberglas Ascot — Telex 847568

B.P. 13, F-80290 D'ARDOISE, FRANCE (plant)
Owens-Corning Fiberglas France, S.A.
Siege de l'Ardoise, Laudun, France — (66) 890288
Cable address: Fiberglass l'Ardoise — Telex 49723

MADRID, SPAIN
Owens-Corning Fiberglas France, S.A.
Avenida Del Generalisimo 78-138 — 1/458.72.47
Cable address: — Telex 44347

F-95470 SURVILLIERS, FRANCE
Owens-Corning Fiberglas France, S.A.
rue des Fers 10 — 1/471.9210
Cable address: Octegres-Survi — Telex 690127

D-62 WIESBADEN, GERMANY
Owens-Corning Fiberglas Deutschland G.m.b.H.
Brunnenstrasse 3 — 06121/562031
Cable address: Fiberglas Wiesbaden — Telex 4186122

I-20125 MILAN, ITALY
Owens-Corning Fiberglas Ital. S.p.A.
Via Copernico 34 — 2/6887.451
Cable address: Fiberglas Milano — Telex 38452

LATIN AMERICAN OFFICES:
01000 SAO PAULO, SP, BRAZIL
OCFIBRAS Ltda.
Rua Araujo, 218—Andar Intermediario
Caixa Postal 3093 — 257-8966
Cable address: Fiberglas Sao Paulo — Telex 2811123813

9000 PORTO ALEGRE, RS, BRAZIL
OCFIBRAS Ltda.
Caixa Postal 3478 — 22-7505

135000 RIO CLARO, SP, BRAZIL (plant)
OCFIBRAS Ltda.
Caixa Postal 12
Cable address: Fiberglas Rio Claro — 34-3700

2000 RIO de JANEIRO, GB, BRAZIL
OCFIBRAS Ltda.
Caixa Postal 3478 — 222-0766

BOGOTA, COLOMBIA
Owens-Corning Fiberglas Colombia, S.A.
Carrera 9, No. 80-12 — 537900
Apartado Aereo 81932 — Telex 44483

MIDDLE EAST REGIONAL HOQRS:
ATHENS, GREECE
Athens Tower, Bldg. A. — 7795360
Cable address: 219378 OCF GR

OWENS-CORNING FIBERGLAS PLANTS
AIKEN, SOUTH CAROLINA — area code 803
P.O. Box 499, 29801 — 648-8351

AMARILLO, TEXAS — area code 806
1701 Hollywood Rd., 79109 — 622-1532

ANDERSON, SOUTH CAROLINA — area code 803
P.O. Box 1367, 29621 — 296-3511

ASHTON, RHODE ISLAND — area code 401
Front St., 02864 — 725-8100

BAKERSFIELD, CALIFORNIA — area code 805
115 Kentucky St., 93305 — 327-0694

BARRINGTON, NEW JERSEY — area code 609
P.O. Box 9, 08007 — 547-9200

BERLIN, NEW JERSEY — area code 609
P.O. Box 100, 08009 — 767-3370

BLOOMINGTON, ILLINOIS — area code 309
1111 W. Perry Street, 61701 — 828-1291

CONROE, TEXAS — area code 713
P.O. Box 1597, 77301 — 756-7731

DELMAR, NEW YORK — area code 518
P.O. Box 89, 12054 — 439-[illegible]

FAIRBURN, GEORGIA — area code [illegible]
P.O. Box 105, 30213 — 964-9811

HUNTINGDON, PENNSYLVANIA — area code 814
P.O. Box 352, 16652 — 643-3240

HUNTSVILLE, ALABAMA — area code 205
P.O. Box 6086 Stycemor, 35806 — 772-7066

JACKSON, TENNESSEE — area code 901
P.O. Box 2008, 38301 — 424-3300

KANSAS CITY, KANSAS — area code 913
P.O. Box 15139, Fairfax Sta., 66115 — 281-2511

MT. UNION, PENNSYLVANIA — area code 814
Rt. 522 South, 17066 — 542-8418

NEWARK, OHIO — area code 614
Case Avenue, 43055 — 345-3441

SANTA CLARA, CALIFORNIA — area code 408
Box 89, 950 Central Expressway, 95052 — 296-2525

TUKWILA, WASHINGTON — area code 206
496 Andover Park East, 98188 — 575-0850

VALPARAISO, INDIANA — area code 219
2252 Industrial Dr., 46383 (INCP) — 462-5178
2252 Industrial Dr., 46383 (R&C) — 464-4802

WAXAHACHIE, TEXAS — area code 214
P.O. Box 637, 75165 — 937-1343

OWENS CORNING ROOFING PLANTS
ATLANTA, GEORGIA — area code 404
4799 Frederick Drive, 30336 — 691-2910

BROOKVILLE, INDIANA — area code 317
W. Eighth Street, 47012 — 647-4131

COMPTON, CALIFORNIA — area code 213
1501 North Tamarind St., 90224 — 636-1191

DENVER, COLORADO — area code 303
5201 Fox Street, 80216 — 623-6796

DETROIT, MICHIGAN — area code 313
12500 Stocker Avenue, 48217 — 843-1700

EMMAUS, PENNSYLVANIA — area code 215
726 Broad Street, 18049 — 965-6629

FT. LAUDERDALE, FLORIDA — area code 305
1010 S. E. 20th Street, 33316 — 524-1556

HAZELWOOD, MISSOURI — area code 314
123 Brown Road, 63042 — 731-0472

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HOUSTON, TEXAS 5360 Market Street Rd., 77029	area code 713 672-8338
IRVING, TEXAS 201 N. Nursery Road, 75060	area code 214 438-1050
JACKSONVILLE, FLORIDA 1025 Talleyrand Ave., 32205	area code 904 353-7361
JESSUP, MARYLAND Dorsey Run & Patuxent, 20794	area code 301 792-4811
KEARNY, NEW JERSEY Newark Turnpike 07032	area code 201 998-5666
LUBBOCK, TEXAS 7802 Southeast Drive, 79406	area code 806 747-2691
MEDINA, OHIO 890 West Smith Rd., 44256	area code 215 725-4158
MEMPHIS, TENNESSEE 704 Comine Avenue 38107	area code 901 525-4556
MIAMI, FLORIDA 2745 N.W. 54th St., 33142	area code 305 633-4804
MINNEAPOLIS, MINNESOTA 1901 49th Ave. North 55430	area code 612 522-3235
MISHAWAKA, INDIANA E. Jefferson Road 46544	area code 219 259-5245
MOREHEAD CITY, NORTH CAROLINA 105 Atlantic Street, 28557	area code 919 725-4171
NO. KANSAS CITY, MISSOURI 525 Armour Road 64116	area code 816 471-3600
OKLAHOMA CITY, OKLAHOMA 510 N. Sheridan Avenue 73117	area code 405 236-5668
PORTLAND, OREGON 3750 N.W. [illegible] Avenue, 97208	area code 503 228-7868
SAN LEANDRO, CALIFORNIA 2005 Marina Blvd. 94577	area code 415 357-3910
SUMMIT, ILLINOIS 5822 Archer Road 60501	area code 312 458-2916
WALTHAM, MASSACHUSETTS Clematis Avenue 02154	area code 617 484-1600
WOODS CROSS, UTAH 990 West 1500 South 84087	area code 801 295-3431
[illegible]	
ATLANTA, GEORGIA 4775 [illegible] Dr., S.W., 30335	area code 404 691-5450
BROOKVILLE, INDIANA W. 6th Street 47012	area code 317 647-5421
COMPTON, CALIFORNIA 1720 Marina Blvd. 90224	area code 213 631-5946
DENVER, COLORADO 5201 N. Bannock St. 80216	area code 303 893-6925
DETROIT, MICHIGAN 12447 Brooker Road 48216	area code 313 843-4450
FT. LAUDERDALE, FLORIDA 1205 S.E. 22nd Street 33316	area code 305 524-4691
HAZELWOOD, MISSOURI 115 Brown Road 63042	area code 314 731-1315
HOUSTON, TEXAS 5360 Market Street Rd., 77029	area code 713 672-7371
IRVING, TEXAS 209 North Nursery, 75061	area code 214 438-2565
JACKSONVILLE, FLORIDA [illegible] Ave. 32205	area code 904 354-4401
JESSUP, MARYLAND 6205 Patuxent Range Dr. 20794	area code 301 792-4669
KEARNY, NEW JERSEY Newark Turnpike, 07032	area code 201 998-2534
LUBBOCK, TEXAS Route #10, Box 921, 79404	area code 806 744-5989
MARTINEZ, CALIFORNIA 120 Waterfront Road, 94553	area code 415 228-4219
MEDINA, OHIO 870 W. Smith Road, 44256	area code 218 725-4119
MEMPHIS, TENNESSEE 710 Comine St. No. Sta., 38107	area code 901 527-0412
MINNEAPOLIS, MINNESOTA 1701 49th Ave., North 55430	area code 612 522-3871
MOREHEAD CITY, NORTH CAROLINA 107 Arendell Avenue, 28557	area code 919 725-4101
N. KANSAS CITY, MISSOURI 533 Armour Road 64116	area code 816 471-4048
OKLAHOMA CITY, OKLAHOMA 3400 N. E. 4th St., 73115	area code 405 235-2491
PORTLAND, OREGON 3605 N.W. 35th St., 97208	area code 503 227-2668
SAN LEANDRO, CALIFORNIA 2005 Marina Blvd., 94577	area code 415 357-3715
SUMMIT, ILLINOIS 53rd & Archer Rd. 5050	area code 312 496-3300
WALTHAM, MASSACHUSETTS Waverly Street, 02154	area code 617 484-2560
WOODS CROSS, UTAH 991 West 1500 South, 84087	area code 801 295-3489
[illegible] TECHNICAL CENTER GRANVILLE, OHIO P.O. Box 415 43023	area code 614 587-0810
[illegible] CORPORATION GENERAL OFFICES* Fiberglas Tower, Toledo, Ohio 43659	area code 419 248-8000

*These locations can be reached by cable address
*Fiberglas

Owens-Corning Fiberglas Corporation

Pocket Directory

FIBERGLAS

January, 1979

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37. Identify the total number of employees, former employees, or surviving spouses of deceased employees, of defendant or of defendant's contract unit(s) now receiving or who at any time since 1940 received benefits under the workers' compensation laws of any state, province, or country as a result of a claim for mesothelioma, asbestosis, cancer of the respiratory tract, cancer of the colon, or cancer of the rectum.

See answer to #36.

38. If the answer to interrogatory no. 37 is other than negative, please identify the name of each such employee, former employee, or surviving spouse, and the identifying number and jurisdiction of each such claim.

See answer to #36.

39. Did the defendant at any time manufacture asbestos-containing products which it then sold to another manufacturer of asbestos-containing products?

Yes.

40. If the answer to the immediately preceding interrogatory is other than negative, please state:

a) The identity of the manufacturer to whom such asbestos products were sold;
b) The product or products so sold;
c) The date of such sales;
d) Pursuant to the Ohio Rules of Civil Procedure, and particularly Rule 34, please produce a copy of all written documents, invoices, contracts, or other papers related to such sales.

a-c) See OCF Exhibit #30 (Product chart)

d) Written documents, invoices, contract or other papers are not presently available however discovery continues.

41. Did the defendant ever purchase asbestos-containing products of any other manufacturer which this defendant then sold or distributed?

Yes.

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42. If the answer to the immediately preceding interrogatory is other than negative, please state:

a) The identity of the manufacturer(s) from whom such asbestos-containing products were purchased;
b) The identity of the products involved;
c) The exact dates or time periods of such purchases;
d) Pursuant to the Ohio Rules of Civil Procedure, and particularly Rule 34, please produce a copy of all written documents, invoices, contracts or other papers related to such purchases.

a-c) See OCF Exhibit #30 (Product chart)

d) See OCF Exhibits #8,15,27

43. Did the defendant at any time from the period 1940 until December 31, 1977, ever enter into any contracts with any other manufacturer of asbestos-containing products, whereby the defendant agreed to distribute or sell the asbestos-containing products of such other manufacturer?

Yes.

44. If the answer to the immediately preceding interrogatory is other than negative, please state:

a) The identity of the manufacturer(s) with whom such contracts were made;
b) Identify the products involved in such sales or distribution agreements;
c) Identify the effective date or dates of such agreements;
d) Pursuant to the Ohio Rules of Civil Procedure, and particularly Rule 34, please produce a copy of all such agreements.

a) Owens Illinois

b) Kaylo

c-d) See OCF Exhibit #24.

45. For the period 1940 through December 31, 1977, did the defendant ever purchase asbestos-containing products and rebrand such products or put defendant's brand on such products, or have someone else put defendant's brand on such products?

Yes.

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46. If the answer to the immediately preceding interrogatory is other than negative, please identify:

a) The name of all manufacturers whose products were so purchased, and the original brand name on such products;
b) The identity, either by brand name or generic description, of the product so involved;
c) The dates of purchase of the products identified in this interrogatory.

a-c) See OCF Exhibit #30.

47. With regard to the products identified in response to interrogatory no. 5, identify by number, all patents related either to the production or manufacture or such products. This interrogatory requests the defendant to list all such patents which it has owned at any time from the period 1940 through December 31, 1977, regardless of whether or not the patent is now expired.

See OCF Exhibit #28 (patent List)

48. At any time for the period 1940 through December 31, 1977, was the defendant a party, either as a licensor or licensee, to any licensing contract with regard to the manufacture of asbestos-containing products?

No.

49. If the answer to the immediately preceding interrogatory is other than negative, please state:

a) The identity of the other party or parties to this contract;
b) The date of the contract;
c) The products involved in or covered by such agreement;
d) Pursuant to the Ohio Rules of Civil Procedure, and particularly Rule 34, please produce a copy of all such licensing agreements.

N.A.R.

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50. For the period 1932 through December 31, 1977, has the defendant, its contract unit(s), or its subsidiaries, ever maintained a medical library?

Yes.

51. If the answer to the immediately preceding interrogatory is other than negative, please identify:

a) The address of each such library;
b) The dates of existence of each such library at each identified address;
c) The custodian of the records of each such library, including the period of time that person was custodian, and that person's current or last known address.

a.) OCF, Fiberglas Tower, Medical Center, Toledo, Ohio 43659

b.) 1968 to present.

c.) F.W. Lichtenberg - 4-1-75 to 3-1977 - OCF, Fiberglas Tower, Toledo, Ohio 43659.
S.D. Fansler - 3-1977 to present same address as above

52. For the period that the previously-identified library facilities were maintained, did your company subscribe to or receive the following identified medical or scientific journals, and if so, state the date of such subscription or receipt:

a) The Journal of the American Medical Association;
b) The British Medical Journal;
c) The Lancet;
d) The Journal of Industrial Hygiene;
e) Review;
f) Tubercle;
g) Public Health Reports;
h) Journal of Industrial Hygiene and Toxicology;
i) United States Government Public Health Service Bulletin No. 241;
j) American Journal of Public Health;
k) Publications from the American Society for the Control of Cancer;
l) The British Journal of Cancer;
m) Post Graduate Medical Journal;
n) American Journal of Clinical Pathology;
o) British Journal of Industrial Medicine;
p) Danish Medical Bulletin
q) A.M.A. Archives of Environmental Health;
r) South African Medical Journal;
s) Nature;
t) Medical Journal of Australia;
u) American Practitioner;
v) Thorax;
w) Annals;
x) New York Academy of Sciences;
y) British Journal of Diseases of the Chest;
z) Journal of Occupational Medicine;

aa) Archives of Environmental Health;
bb) American Journal of Medicine;
cc) Industrial Medicine and Surgery;
dd) Journal of the National Cancer Institute;
ee) Chest;
ff) Medicine;
gg) Annals of Internal Medicine;
hh) Human Pathology.

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a-hh) See answer to #25.

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53. For the period 1940 through 1977, for each calendar year, please state:

a) The total pound volume of chrystolite asbestos purchased by your company;
b) The total pound volume of chrystolite asbestos mined by your company;
c) The total pound volume of chyrstolite asbestos used by your company in all of its manufacturing processes;
d) The total pound volume of chrystolite asbestos sold by your company in unprocessed form;
e) The total pound volume of chrystolite asbestos acquired by your company in a manner other than purchase or mining, and if so, identify the manner of acquisition.

This defendant did not commence the manufacture of asbestos containing insulation until 1958 and such practice ceased in 1972. Presently available records are for 1964-1972 and they are not complete. Discovery continues.
a.) 8,236 tons of chrysotile.
b.) This defendant never mined asbestos.
c.) Unknown. This defendant only manufactured pipe insulation.
d.) Unknown what type asbestos was - but 889.3 tons was sold.

54. For the period 1940 through 1977, for each calendar year, please state:

a) The total pound volume of crocidolite asbestos purchased by your company;
b) The total pound volume of crocidolite asbestos mined by your company;
c) The total pound volume of crocidolite asbestos used by your company in all of its manufacturing processes;
d) The total pound volume of crocidolite asbestos sold by your company in unprocessed form;
e) The total pound volume of crocidolite asbestos acquired by your company in a manner other than purchase or mining, and if so, identify the manner of acquisition.

a-e.) None.

55. For the period 1940 through 1977, for each calendar year, please state:

a) The total pound volume of amosite asbestos purchased by your company;
b) The total pound volume of amosite asbestos mined by your company;
c) The total pound volume of amosite asbestos used by your company in all of its manufacturing processes;
d) The total pound volume of amosite asbestos sold by your company in unprocessed form;
e) The total pound volume of amosite asbestos acquired by your company in a manner other than purchase or mining, and if so, identify the manner of acquisition.

See preamble to Interrogatory #53.
a.) 11,786 tons
b.) This defendant never mined asbestos
c.) See answer to 53C.
d.) See answer to 53D.
e.) None.

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56. On what date did the defendant first gain knowledge that its asbestos-containing products might be harmful to human health?

See attached 3 page explanation/answer.

57. Identify each person who the defendant expects to call as an expert witness at trial, and state:

a) The subject matter on which the expert is expected to testify;
b) The name and address of each such expert witness;
c) A summary of the facts and opinions to which the expert is expected to testify;
d) A summary of the grounds for each such opinion held by each such expert witness.

This defendant has not determined who are to be witnesses for trial at this time.

58. Identify the name and address of each person who, on behalf of the defendant, provided any information used for the purposes of answering this set of interrogatories.

See attached Preamble.

59. Identify the name and address of all persons known to the defendant to have knowledge of discoverable facts relative to this case.

See answer to #58.

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PREAMBLE

As a part of its ongoing effort to insure discovery of all relevant documents pertaining to asbestos litigation, this defendant has searched its Technical Center in Granville, Ohio and its Berlin Plant, in Berlin, New Jersey and the Willis Day warehouse in Toledo, Ohio over the period from March through September, 1979. This defendant is continuing its search of corporate records at the present time and reserves the right to produce additional relevant documents subsequently discovered. To date this defendant has reviewed approximately 200,000 documents including those mentioned above and we have updated our information as to the period of time from 1940 to the present.

ANSWER

This defendant recognizes that insulating materials containing asbestos fibers may be harmful to human beings under certain conditions of prolonged and excessive exposure.

In the early 1940's, some employees of this defendant became aware of potential health hazards associated with the inhalation of asbestos fibers. This information came to the attention of these employees during a period of time when extensive studies were being conducted on fibrous glass.

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In 1953, this defendant began to distribute a hydrous calcium silicate reinforced with asbestos, called Kaylo, which was manufactured by Owens-Illinois. This defendant began to manufacture the product in 1958, when it purchased the Berlin, New Jersey plant from Owens-Illinois.

In 1956, prior to this acquisition, this defendant inquired into the information that Owens-Illinois had regarding the health aspects of the Owens-Illinois Kaylo product. This defendant was informed that a study at Saranac Lake, published in 1955, showed that animals, if exposed for a prolonged period of time to high concentrations of Kaylo dust, could develop a mild asbestosis reaction. However, this defendant was informed at the same time that experience in the manufacturing plants, including x-ray results, revealed no lung changes of any kind that could be attributed to occupational exposure to Kaylo.

Other documents, presumably received from Owens-Illinois around the time of the acquisition, informed this defendant that Owens-Illinois had concluded, based on its experience in the factories and in the field and its consideration of the Saranac report, that the actual hazard to the health of those handling Kaylo was considered to be small.

It was not until around 1964 that this defendant was made aware of new developments concerning the potential hazards of asbestos insulating materials. Around 1965, this defendant

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became aware of Dr. Selikoff's study of pipe insulators which questioned for the first time the conclusion of the 1946 Fleisher-Drinker study that the insulation trade was reasonably safe.

In 1964, this defendant had warnings placed on the asbestos containing cement manufactured by Eagle Picher, which was rebranded and sold by this defendant. In January, 1967, this defendant had warning labels placed on its Kaylo products. In 1971 this [illegible] had warning labels placed on its Fyrcor products

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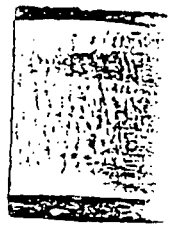

#62.

Answers to these interrogatories were prepared based upon a search of
esently existing corporate files and records regularly maintained in the
dinary course of business of Owens-Corning Fiberglas Corporation and also
formation contained during interviews with various employees of the com-
ny. No single officer, employee or agent of the company has the direct
owledge or the proper documents necessary to supply each and every answer
quired. All answers are derived from a number of sources, persons and
cuments. The person signing the answers to these interrogatories does so
lely to satisfy whatever requirement may exist under the applicable rule
civil procedure requiring an officer of the corporation answering the in-
rrogatories to affix his signature. Such signing officer does not, however,
ve direct knowledge regarding any specific answer but is informed that the
les, documents and interviews referred to above do support the responses
ted based upon information available as the date of signature. If informa-
n is later obtained which changes, modifies or enlarges any of the answers
re presented, such information will be conveyed to the parties submitting
ese interrogatories. These interrogatories are signed by Thurman W. Bretz, Senior
e President - Finance & Law, Owens-Corning Fiberglas Corporation, Fiberglas
wer, Toledo, Ohio 43659. The telephone number of the corporation is
C 419/248-8000.



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60. Identify the name and address of each non-expert witness which the defendant intends to use at the time of trial, and the general nature of the testimony anticipated from each such witness.

See Answer to #57.

61. For the period 1946 through 1977, state the beginning and ending date of each fiscal year used by the defendant for accounting purposes.

Objection.

62. For each fiscal year for the period 1946 through 1977, state:

a) The total sales dollar volume of asbestos or asbestos-containing products;
b) The net income generated by the company, before taxes, as a result of the sales identified in subpart (a) of this interrogatory;
c) The total gross dollar sales of the defendant for each fiscal year;
d) The net profit with regard to the total sales shown in subpart (c) of this interrogatory;
e) Pursuant to the Ohio Rules of Civil Procedure, and particularly Rule 34, please produce copies of the defendant's annual report for the period 1962 through 1978.

This defendant did not commence the sale of asbestos containing products until 1953. The sale of such product ceased in early 1973 and the manufacture of such product ceased in 1972.

a.) See OCF Exhibit #32 for presently available figures.

b-e) See OCF Exhibits #38 for Annual Reports from 1953-1973.

TIMOTHY M. BITTEL
ZIEGLER, METZGER, MILLER & HOPPE
1670 Union Commerce Building
Cleveland, Ohio 44115
781-5470

Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

The original and two copies of the foregoing Interrogatories and Request for Production of Documents were were mailed to the respective defendants at the addresses shown below, on this 15 day of October, 1979:

Johns-Manville Sales Corp.
Ken-Caryl Ranch
Denver, Colorado 80217

The Celotex Corporation
c/o C. T. Corporation System
Statutory Agent
Union Commerce Building
Cleveland, Ohio 44115

Raybestos-Manhattan, Inc.
c/o C. T. Corporation System
Statutory Agent
Union Commerce Building
Cleveland, Ohio 44115

Owens-Corning Fiberglas Corp.
c/o R. LaMar Frederick
Statutory Agent
Fiberglas Tower
Toledo, Ohio 43659

Owens-Illinois, Inc.
Madison and North St. Clair
Toledo, Ohio 43659

The Flintkote Co.
c/o C. T. Corporation System
Statutory Agent
Carew Tower
Cincinnati, Ohio 45202

Armstrong Cork Company
c/o C. T. Corporation System
Statutory Agent
Union Commerce Building
Cleveland, Ohio 44115

GAF Corporation, c/o C.T. Corp.
Statutory Agent
Carew Tower
Cincinnati, Ohio 45202

Atlas Asbestos Company
5600 Hochelaga Street
Montreal, Quebec, Canada

TIMOTHY M. BITTEL
ZIEGLER, METZGER, MILLER & HOPPE
1670 Union Commerce Building
Cleveland, Ohio 44115
781-5470

Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

A copy of the foregoing Answers to Plaintiff's Requests for Admissions and Interrogatories Propounded to Defendant, Owens-Corning Fiberglas Corporation, has been mailed this 5 day of November, 1979, to Timothy M. Sittel, attorney for plaintiff, at 1670 Union Commerce Building, Cleveland, Ohio 44114 and copies have been mailed to all defense counsel of record at the following address:

Robert C. Quandt, Esquire
Attorney for Armstrong Cork Company
800 Leader Building
Cleveland, Ohio 44114

James P. Conroy, Esquire
Attorney for Rock Wool Manufacturing
Co. and Atlas Asbestos Company
2500 Terminal Tower
Cleveland, Ohio 44113

Richard F. Stevens, Esquire
Attorney for Johns-Manville
Sales Corporation
2121 Superior Building
Cleveland, Ohio 44114

Parker M. Orr, Esquire
Attorney for GAF Corporation
1936 Union Commerce Building
Cleveland, Ohio 44115

Richard J. Disantis, Esquire
Attorney for Raybestos-
Manhattan, Inc.
1400 East Ohio Building
Cleveland, Ohio 44114

James L. Malone, Esquire
Attorney for Celotex Corporation
300 Leader Building
Cleveland, Ohio 44114

Barbara Arison
Attorney for The Flintkote
Company
c/o Thompson, Hine, Flory
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Michael E. McConnell
Attorney for Owens-Illinois
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Toledo, Ohio 43603

H. Vincent E. Mitchell

H. Vincent E. Mitchell
Attorney for Owens-Corning Fiberglas
Corporation
1800 Union Commerce Building
Cleveland, Ohio 44115

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STATE OF OHIO)
) SS:
COUNTY OF LUCAS)

THURMAN W. BRETZ, being duly sworn according to law, hereby deposes and says that he is Senior Vice President Finance and Law of Owens-Corning Fiberglas Corporation and is authorized to sign affidavits on its behalf and that the facts set forth in the Answers to the Plaintiffs' Interrogatories are true and correct to the best of his knowledge, information and belief.

Thurman W. Bretz

Sworn and Subscribed to before me
this 5th day of Dec, 1979.

Notary Public
SHARON L. TRAUDT
Notary Public, Lucas County, Ohio
My Commission Expires Nov. 19, 1981

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O.C.F.C.

EXHIBIT NO. 111

Correspondence between Saranac Laboratory and employees at Owens-Illinois for the years 1943 through 1952. Letter dated, 6/11/79, reviews the material contained in Exhibit #111.

This Exhibit contains a multitude of Correspondence between Saranac Laboratory, The Trudeau Foundation, Saranac Lake, New York, and employees at Owens-Illinois for the years 1943 through 1952. Also contained in this Exhibit are reports on the Laboratory's studies of Inhaled Kaylo Dust into the lung, various analyses of asbestos fibers/dust and results of sacrificed animals after being exposed to Kaylo dust. The material in this Exhibit was secured from old records from the Trudeau Institute (previously known as the Saranac Laboratory), Saranac Lake, New York. This Exhibit consists of 319 pages. Letter dated, June 11, 1979, reviews the material contained in Exhibit #111.