

FILE NAME: DuPont (DUP)

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5/24/93

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

DANIEL P. MACMURRAY, Indivi- :
dually and as Executor of the :
Estate of MABEL P. MACMURRAY, :
Plaintiff, :
v. : C.A. No. 91C-10-9
E. I. DUPONT DE NEMOURS & : (Asbestos)
COMPANY, INC., et al., :
Defendants. :

DANIEL P. MACMURRAY, AS EXECUTOR OF THE
ESTATE OF MABEL P. MACMURRAY SUPPLEMENTAL
ANSWERS TO INTERROGATORIES DIRECTED
TO MABEL P. MACMURRAY BY ALL DEFENDANTS

11. With respect to any products containing asbestos manufactured, packaged, furnished, supplied, or sold by each defendant named in this action that you claimed to have worked with or around, state the following for each defendant.

(a) The name of the product or products;

ANSWER: In addition to plaintiff's previous answers, plaintiff Daniel MacMurray believes he was also exposed to asbestos as follows:

Mr. MacMurray helped develop a DuPont product which contained asbestos. During the late 1950s or early 1960s, while Mr. MacMurray was working at the DuPont Engineering Development Laboratory he worked with a DuPont product known as polyimide, where with the help of Mr. Ewing, he combined raw asbestos with polyimide to make a brake block. After he learned this product was resistant to heat, he came up with the idea of using it as a binder in asbestos friction products, to prevent "break fade". It is Mr. MacMurray's understanding that this procedure was later patented and that in the late 1960s DuPont opened a plant in

Glasgow to make products with polyimide resins. During the time periods when Mr. MacMurray lived in Wilmington, Delaware with his wife, she would be exposed each evening to the asbestos he brought home on his clothing, as well as each time she washed the clothes he wore while working with asbestos.

It is Mr. MacMurray's understanding that at the DuPont Buffalo, New York, River Road Plant, in the early 1960s, there was a process in which Tedlar film was used as a laminate for wallboards containing asbestos, supplied by Johns-Manville. Mr. MacMurray was present during the use of Tedlar at the DuPont Buffalo, New York plant during the early 1960s. During this time, Mr. MacMurray was involved with a plastic product called celuseal in the area where the Tedlar lamination work was being done. While he was working at the DuPont Buffalo plant where he was exposed to asbestos, he regularly returned home to Wilmington, Delaware every weekend. He routinely took his asbestos contaminated clothing home which would be washed by his wife.

Mr. MacMurray also was exposed to the asbestos used in the wadding for shotgun shells used in Remington firearms at the DuPont Bridgeport, Connecticut plant where he worked for 2 years. While he was working at the DuPont Bridgeport, Connecticut plant where he was exposed to asbestos, he regularly returned home to Wilmington, Delaware every weekend. He routinely took his asbestos contaminated clothing home which would be washed by his wife.

He also was exposed to asbestos by the use of asbestos gloves in the Forge Shop where he made modifications to a rolling

mill for forging shotgun and rifle barrels at the Remington Arms, Ilion, New York plant. He now understands asbestos was used in the manufacture of nylon stocks for Remington firearms at the Remington, Ilion, New York plant, but presently is unaware that he was exposed to asbestos during this process. Mrs. MacMurray lived with him in Ilion, New York. During the time periods when Mr. MacMurray lived in Ilion, New York with his wife, she would be exposed each evening to the asbestos he brought home on his clothing, as well as each time she washed the clothes he wore while working with asbestos.

At all of the locations Mr. MacMurray worked, no special precautions were taken, or special clothing was worn by him when working with asbestos.

In addition, two different asbestos-containing tile samples of tile Mr. MacMurray installed in his home, which he referred to in his deposition, have been analyzed. The attached report reveals that they did indeed contain asbestos.

During his deposition, Mr. MacMurray described his exposure to asbestos insulation at various DuPont plants. An example of this is contained in the pictures from the DuPont Spruance plant in Richmond, Virginia, which Mr. MacMurray has just found (See attached pictures).

Finally, plaintiff 's counsel is now aware that DuPont used raw asbestos in the manufacture of the following products and Mr. MacMurray and his counsel are presently investigatng into whether he, and therefore his wife, may have been exposed to asbestos as a result of their operations:

1. Paint films.

2. Radiator stop leak products.
3. Cement block primers (a paint like material).
4. Undetermined products in the elastomers
laboratory.

5. As a component of talc, an ingredient in DuPont
paints and primers.

JACOBS & CRUMPLAR, P.A.

By: Thomas C. Crumplar
Thomas C. Crumplar
2 East 7th Street
P.O. Box 1271
Wilmington, DE 19899
(302) 656-5445
Attorney for Plaintiffs

Date: 5/24/93

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