

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS.

SUPERIOR COURT
CIVIL NO.

EILEEN A. DUNN, Executrix of the
Estate of William F. Dunn,
deceased, and in her own behalf;
and CAROLINE M. DUNN,

Plaintiffs,

v.

MONSANTO COMPANY; THE DOW
CHEMICAL CO.; B.F. GOODRICH CO.;
GREAT AMERICAN CHEMICAL CORP.,

Defendants.

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF
TO BE ANSWERED UNDER OATH BY THE DEFENDANT,
GREAT AMERICAN CHEMICAL CORPORATION, SET I

Instructions

Whenever you are requested to identify a document or other written material, please do so with sufficient particularity to enable the material to be made subject to a motion for production of documents, including present location of such document, and name, business address, and business telephone number of the person now having custody of it.

GACC 00378

Definitions

All references to defendant "Monsanto Company" include all subsidiaries and predecessor corporations of the Monsanto Company.

As regards all defendants, these interrogatories are addressed to and seek information concerning any subsidiary or predecessor corporation of said defendants.

Interrogatories:

1. Please state your corporate name, state and date of incorporation, corporate purpose, address of principal place of business, names of all subsidiaries and predecessor corporations, corporate purposes of all subsidiaries and predecessor corporations, and the date of acquisition by you of all subsidiaries, and the dissolution of all predecessor corporations.

2. For all products or materials containing polyvinyl chloride ("PVC") and/or vinyl chloride ("VC") or for which PVC and/or VC was a product of decomposition sold or supplied by you to the Monsanto Company between the years 1954 and 1979, please state:

- a. trade name;
- b. the name and address of the plant to which the product or material was shipped;
- c. the dates during which the product was shipped to that plant.

3. For each product identified in response to Interrogatory 2, please state the following:

- a. composition, including amount and nature of PVC and/or VC;
- b. intended use;
- c. form of product or material and manner of packaging;
- d. place of manufacture, marketing, sale and distribution;
- e. dates during which you manufactured, produced, shipped, marketed, sold or distributed this product.

4. For all products containing PVC and/or VC or for which PVC and/or VC was a product of decomposition sold or supplied by you to the Monsanto Company during the years 1954-1979, please identify:

- a. all purchase orders evidencing such sales or supply;

- b. all invoices evidencing such sales or supply;
- c. all statements of account evidencing such sales or supply;
- d. any other written materials including office memoranda relating to such sales or supply;
- e. all correspondence with or between officers or agents of the Monsanto Company relating to such sales.

5. For each individual in your employ at any time subsequent to 1953, who has knowledge of the sales or supply by you of PVC and/or VC-containing products or materials, or products or materials for which PVC and/or VC is a product of decomposition, to the Monsanto Company between the years 1954 and 1979, please state:

- a. the individual's name;
- b. his or her present address and telephone number;
- c. his or her present employment and job classification if still in your employ;
- d. his or her job title during the time that he or she had such knowledge, with dates for each job title.

6. Please state the full name, home address and telephone number, business address and telephone number, and employment

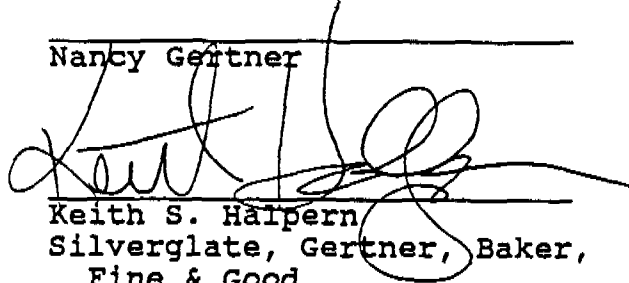
capacity or title of the individual signing these interrogatories on behalf of the answering defendant, and of all other individuals who have supplied information in answer to these interrogatories, specifying next to the name of each such individual the number of the interrogatory or interrogatories to which that individual contributed the response.

Dated: August 6, 1985

Respectfully submitted,

By their attorneys,

Nancy Gertner

A large, stylized handwritten signature in dark ink, likely belonging to Keith S. Halpern, is written over a horizontal line. The signature is cursive and somewhat abstract, with long, sweeping strokes.

Keith S. Halpern
Silverglate, Gertner, Baker,
Fine & Good
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