FILE NAME: Johns-Manville (JMA)

DATE: 1980 Jan 21

DOC#: JMA253

DOCUMENT DESCRIPTION: Letter from Clark, Gagliardi & Miller to Fulton Height, Esq. RE St. Jacque vs. Johns-Manville, et al.

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January 21, 1980

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FEB
LEGAL DEPARTMENT

Fulton Haight, Esq.
Haight, Dickson, Brown & Bonesteel
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Re: St. Jacque v. Johns-Manville, et al.

Dear Mr. Haight:

At your request we appeared on behalf of the Johns-Manville entities at the deposition of J. P. Stevens Company on January 18, 1980. The witness produced by J. P. Stevens was Charles F. Langston. Mr. Langston makes an excellent appearance and possesses an extensive knowledge of the J. P. Stevens Company. He was first employed by Stevens in or around 1950 and has held numerous positions with increased responsibility since his employment.

Mr. Langston testified that during the period 1957 to 1961 the Stevens Company manufactured some synthetic fabrics which contained asbestos fibers. These fabrics were used in the manufacture of protective fire suiting, ironing board covers and electrical substraits. The protective fire suiting was sold to the government and was manufactured pursuant to military specifications. The military specifications were produced and marked for identification. The iron board covers and electrical substraits were not supplied to the government. The manufacture of all of the above products was discontinued in the early 1970's for economic reasons. Mr. Langston testified that he was the individual who made the decision to discontinue the manufacturing of these products.

Mr. Langston testified that he first became aware of a potential health hazard associated with asbestos in 1969 when the Stevens Company received a letter from Owens-Corning which had attached to it correspondence from the Department of the Navy which listed the possibility of a hazard associated with asbestos. Mr. Langston doesn't know what date Stevens received this letter.

Mr. Langston testified that the asbestos containing products aforementioned where manufactured at a Stevens plant located in Slater, North Carolina. Stevens purchased their asbestos fibers from H.K. Porter, Southern Asbestos, Raybestos-Manhattan and the U.S. Rubber Company. Mr. Langston testified that, to his knowledge, the Stevens

Company has had one compensation claim filed against it by an employee for an asbestos related injury. The employee who filed this claim worked at the Slater plant. Mr. Langston did not have any recollection of the disposition of this claim.

Mr. Langston testified that after receiving the abovementioned letter from the Department of the Navy the Stevens Company increased efforts to develop fiberglas materials and fabrics which would be suitable for insulation purposes. They increased their efforts in an attempt to obtain a great share of the insulation market. The Stevens Company was not influenced by the Navy's letter warning of potential asbestos health hazard because it was their feeling that the letter did not apply to any of the products manufactured by Stevens.

Mr. Langston testified that the Stevens Company has manufactured and supplied the U.S. Government with shipboard insulation materials and that some of these materials were delivered to the Long Beach Naval Shipyard. According to Mr. Langston none of the insulation shipped to Long Beach contained asbestos. Stevens stopped supplying the Long Beach Shipyard with insulation material in 1976. Mr. Langston further testified that the Sevens Company has never manufactured any kind of insulation containing asbestos. Following this line of questioning the deposition of Mr. Langston was concluded.

If I can be of any further assistance in this matter, please feel free to contact me.

Very truly yours,

John J. Burke

JJB:mjm

cc: James K. Green, Esq.
Jerome Passman, Manager