



DISTRICT COURT, BOULDER COUNTY, COLORADO

Civil Action No. 89 CV 2000

**W.R. GRACE & CO.--CONN.'S ANSWERS AND OBJECTIONS TO PLAINTIFF'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

IN RE ASBESTOS CASES- BOULDER

GENERAL OBJECTIONS

W.R. Grace & Co.--Conn., formerly known as W.R. Grace & Co., ("Grace"), incorporates by reference its General Objections to its Amended Answers and Objections to Plaintiff's First Set of Interrogatories and Request for Production of Documents as if set forth in full herein.

RESPONSES TO INTERROGATORIES

1. Please state the name, address and position of employment of the person signing responses to these discovery requests.

RESPONSE: John V. Port, Controller, LSG, W.R. Grace & Co.--Conn., One Town Center Road, Boca Raton, FL 33486.

2. Does the person identified in the response to Interrogatory No. 1, above, have personal knowledge of any of the information supplied in response to these discovery requests? If so, identify the information of which that person has personal knowledge.

RESPONSE: No.

3. Did W.R. Grace (as defined herein) ever have an employee named Otto Ambros?

RESPONSE: Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states that it has never had an employee named Dr. Otto Ambros.

4. If the answer to Interrogatory No. 3 is affirmative, state the following:
- a. The date that Otto Ambros was first employed by W.R. Grace.
 - b. The date that Otto Ambros was last employed by W.R. Grace.
 - c. Each job title or position of employment that Otto Ambros had while an employee of W.R. Grace.
 - d. The duties and responsibilities of Otto Ambros during the time of his employment with W.R. Grace.
 - e. The last known address of Otto Ambros while an employee of W.R. Grace.
 - f. After the last date of employment of Otto Ambros by W.R. Grace, did he receive a pension or other monetary payment or benefit on account of his employment with W.R. Grace?
 - g. If the answer to Interrogatory No. 4.f. is affirmative please state the address to which all such pension or other payments or benefits were sent.

RESPONSE: Not applicable.

5. Did W.R. Grace ever pay Otto Ambros for consulting services, apart from any time that Otto Ambros was an employee of W.R. Grace?

RESPONSE: Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states it did pay Dr. Ambros for certain consulting services.

6. If the answer to Interrogatory No. 5 is affirmative state the following:
- a. The date that Otto Ambros was first hired by W.R. Grace as a consultant.
 - b. The date that Otto Ambros was last hired by W.R. Grace.

- c. Each job title or position of employment that Otto Ambros had while an employee of W.R. Grace.
- d. A description of the duties and responsibilities of Otto Ambros each time he was hired as a consultant by W.R. Grace.
- e. The last known address of Otto Ambros when hired by W. R. Grace as a consultant.

RESPONSE: Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states the following:

- a. 1951;
- b. Upon information and belief, Dr. Ambros continued to provide services to Grace until his death in 1990;
- c. Dr. Ambros was never an employee of Grace, and was always referred to as a consultant;
- d. Dr. Ambros provided general consulting services, primarily in the field of organic chemistry, as requested by Grace;
- e. Dr. Ambros' address at the time of his death was Kneibisstrasse 14, 6800 Mannheim, Germany.

7. Did Otto Ambros ever own any stock of W.R. Grace?

RESPONSE: Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states that it has no record of Dr. Ambros ever being a Grace shareholder.

8. The name, address and position of employment or job title of the person who is the custodian of Otto Ambros' complete and unexpurgated W.R. Grace employment or personnel file.

RESPONSE: Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states that it has no payroll, employment or personnel file on Dr. Ambros.

9. The name, address and position of employment or job title of the person who is the custodian of W.R. Grace payroll department, finance department and or W.R. Grace personnel department records concerning Otto Ambros.

RESPONSE: See response to Interrogatory No. 8, above.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Copies of Otto Ambros' complete and unexpurgated employment or personnel file from W.R. Grace.

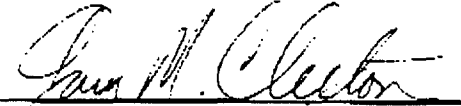
RESPONSE: Grace objects to this request on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection and the General Objections interposed above, Grace states that it has no such files.

2. Copies of W.R. Grace payroll department, finance department and or W.R. Grace personnel department records concerning Otto Ambros.

RESPONSE: See answer to Response No. 1, above.

DATED this 8th day of September, 1994.

PENDLETON & SABIAN, P.C.

By: 

Alan C. Friedberg (6042)

Gary M. Clextion (17419)

Attorneys for Defendant W.R. Grace & Co.--
Conn.

303 East 17th Avenue, Suite 1000

Denver, Colorado 80203

Telephone: (303) 839-1204

Telefax: (303) 831-0786

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