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Responses to Requests for Admissions

*Hampshire's Supplemental Response to Requests for
Admission Abate II 11/23/93*

h. 1976-1980
i. 1981-1985

ANSWER TO REQUEST NO. 14:

Denied as to a through g. Admitted as to h and i.

REQUEST NO. 15:

That during the following time periods you maintained your home office on West 24th Street in Baltimore, Maryland:

a. 1911-1915
b. 1916-1920
c. 1921-1925
d. 1926-1930
e. 1931-1935
f. 1936-1940
g. 1941-1945
h. 1946-1950
i. 1951-1955
j. 1956-1960
k. 1961-1965
l. 1966-1970
m. 1971-1975
n. 1976-1980
o. 1981-1985

ANSWER TO REQUEST NO. 15:

Denied as to a through e. Admitted as to f through o.

REQUEST NO. 16:

That at various times from 1921 to the present you maintained branch offices in the following cities:

a. Bladensburg, Maryland
b. Richmond, Virginia
c. Roanoke, Virginia
d. Norfolk, Virginia
e. Charleston, W. Virginia
f. St. Albans, W. Virginia

ANSWER TO REQUEST NO. 16:

Admitted.

REQUEST NO. 17:

That in the following time period Hampshire Corporation sold, distributed, used, installed and/or applied acoustical products

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REQUEST NO. 77:

In connection with the manufacture of your asbestos-containing products, your own employees would at times perform the following functions with respect to your asbestos-containing products:

- a. mix;
- b. saw;
- c. cut;
- d. trim;
- e. test;
- f. spray or gun;
- g. handle;
- h. sand.

ANSWER TO REQUEST NO. 77:

Denied. See Answer to Request No. 6.

REQUEST NO. 78:

In connection with your own business, you employed individuals who performed duties of:

- a. pipecoverers;
- b. insulators;
- c. pneumatic gun operators;
- d. spray gun operators;
- e. plasterers;
- f. installing asbestos-containing ceiling floor tiles;
- g. installing asbestos-containing drywall/wallboard;
- h. brake and/or clutch mechanics;
- i. vehicle assembly workers or maintenance men;
- j. steamfitters;
- k. pipefitters;
- l. joiners;
- m. shipfitters;
- n. electricians;
- o. latherers;
- p. sheet metal workers;
- q. bricklayers;
- r. millwrights;
- s. welders;
- t. burners;
- u. ironworkers;
- v. laborers;
- w. carpenters;
- x. painters;
- y. boilermakers;
- z. plumbers;

LAW OFFICES
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- aa. roofers;
- bb. operating engineers;
- cc. automobile and/or truck mechanics.

ANSWER TO REQUEST NO. 78:

Admitted as to d, e, f, g, o, v, w, x, and aa. Otherwise denied.

REQUEST NO. 79:

At no time did you advise persons who used, handled or were exposed to your asbestos-containing products that:

(a) you had concluded that respirators in use were inadequate to assure prevention of illnesses and diseases arising out of exposure to asbestos dust, and

(b) you had knowledge that respirators procured for use by your employees exposed to asbestos were not capable of filtering asbestos fibers smaller than 3.5 microns in diameter.

ANSWER TO REQUEST NO. 79:

Denied. See Answer to Request No. 33.

REQUEST NO. 80:

You first installed vacuum and/or exhaust systems on equipment used in fabricating, processing, cutting, mixing or handling asbestos and/or asbestos-containing products at your manufacturing facilities in the following time period:

- | | |
|-----------------|---------------|
| a. before 1930; | b. 1930; |
| c. 1930-1939; | d. 1940-1949; |
| e. 1950-1959; | f. 1960-1964; |
| g. 1965-1969; | h. 1970-1975; |
| i. 1976-1979; | j. 1980-1985; |
| k. 1986-1990; | l. 1991-1993. |

ANSWER TO REQUEST NO. 80:

Denied. Not applicable. Hampshire is not a manufacturer.

REQUEST NO. 81:

You first required your employees to have regular chest x-rays in the following time period: