



IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

ANTHONY MARIO GRECO et al.,	:	CASE NOS. 323629-323678
	:	(HANNA, J.)
Plaintiffs,	:	
VS.	:	IN RE: ALL BARON & BUDD
	:	ASBESTOS CASES
A-BEST PRODUCTS COMPANY, et al.,	:	
	:	
Defendants.	:	

**ANSWERS TO PLAINTIFFS' MASTER SET OF INTERROGATORIES
PROPOUNDED TO PPG INDUSTRIES, INC.**

CORPORATE NAME

1. For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include job title, length of time employed by Defendant and a year by year list of all other positions, titles, or jobs held when working for Defendant.

ANSWER:

The information herein is being provided by Ken Linge with the assistance of outside counsel for PPG Industries, Inc. Ken Linge has held the following positions with PPG Industries, Inc.:

1/17/97	Vice President, Associate General Counsel and Secretary
8/1/94-pr	Associate General Counsel and Secretary
10/1/91	Treasurer
2/1/88	Corporate Counsel & Assistant Secretary
3/1/87	Senior Counsel & Assistant Secretary
11/1/80	Senior Counsel

7/1/77 Senior Attorney
4/16/73 Attorney

Outside counsel for PPG also assisted in answering these interrogatories.

1.1 Please identify all documents used, related to, or referred to in connection with the preparation of or answers to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

ANSWER:

PPG objects to this Interrogatory as burdensome, oppressive and not calculated to lead to the discovery of admissible evidence. PPG will produce, however, the documents relied upon in answering these Interrogatories.

2. Please state whether or not Defendant is a corporation. If so, please state:

- (a) Your correct corporate name;
- (b) The state of your incorporation;
- (c) The address of your principal place of business;
- (d) Your registered agent for service in the state of Ohio;
- (e) For each Defendant claiming that this Court lacks personal jurisdiction, list year by year the total amount of income received by the Defendant from entities in Ohio, any and all years that Defendant, as defined, has been licensed to do business in Ohio, and any real property owned at any time by

Defendant or its present or past subsidiaries.

ANSWER:

The proper name of this Defendant is PPG Industries, Inc., a Pennsylvania corporation; the corporation was incorporated in 1883 as "Pittsburgh Plate Glass Company" and changed its name in 1968 to PPG Industries, Inc. PPG is incorporated under the laws of the Commonwealth of Pennsylvania and maintains its principal place of business at One PPG Place Pittsburgh, Pennsylvania 15272. The certificate of authority to do business in Ohio may be obtained from the Secretary of State of Ohio. PPG's registered agent in Ohio is Prentice Hall d/b/a CFC The United States Corporation Company.

Since its early days, PPG has been a major employer in Pennsylvania and elsewhere, a diversified global manufacturer, a leading supplier of products for manufacturing, building, processing and numerous other world industries. The Pittsburgh-based company makes flat glass and decorative and protective coatings, industrial and specialty chemicals, and fiberglass.

3. State Defendant's complete corporate or business history, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs. In addition:

- a. if defendant or any of its predecessors or subsidiaries at any time purchased, assumed, or in any other manner acquired ANY of the assets and/or liabilities of any corporation or entity at any prior time engaged in any aspect of the placing of asbestos-containing products into the stream of commerce or the insuring of asbestos-related risks, then please state the following as to each acquisition:

- b. the name or description of each corporation, entity or assets acquired by Defendant, that entity's state of incorporation and principal place of business, its date of in/corporation, and the name of Defendant at the time of acquisition;
- c. the manner by which each such corporation, entity or interest therein, was acquired (e.g., merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- d. the date of each such acquisition;
- e. the state in which each such acquisition was effected;
- f. the state law governing each such acquisition if specified by contract;
- g. whether Defendant became legally responsible for the past torts of each such corporation or entity;
- h. identify each document reflecting or related to the history and/or transaction(s) set forth in answer to this Interrogatory.

ANSWER:

See Answer to Interrogatory No. 2. In addition, PPG knows of no mergers, consolidations, asset purchases, acquisitions or spin-offs that had anything to do with asbestos or asbestos-containing products, other than identified in answer to Interrogatory No. 5.

4. Please state whether or not the Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liabilities of any corporation or

entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products.) If so, please state the following:

- a. the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;
- b. the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- c. the date of each such acquisition;
- d. the state in which each such acquisition was effected;
- e. the state law governing each such acquisition if specified by contract;
- f. whether Defendant became legally responsible for the past torts of each such corporation or entity;
- g. whether the acquisition concerned asbestos-containing products.

ANSWER:

No. However, PPG owns 50% of the stock of Pittsburgh Corning Corporation, which manufactured an asbestos-containing thermal insulation product from 1962 to 1972. Pittsburgh Corning Corporation, at all relevant times, has been an independent corporation with its own officers, employees, facilities, products, research and sales force, and has operated as an independent corporation. PPG has held its 50% stock interest in Pittsburgh Corning since 1937; the other 50% shareholder is Corning, Inc.

4.1 For each corporation, other than the answering defendant ("the entity"), that has at any time in the past been involved in the placing of asbestos-containing products into the stream of commerce for which officers of the answering defendant's corporation have also served as officers, directors or served in any managerial position while employed by the answering defendant, state:

- a. the name of the entity involved in the placing of asbestos products into the stream of commerce;
- b. the manner in which the entity was involved in the placing of asbestos-containing products into the stream of commerce (i.e., mining, milling, manufacturing, distributing, installing, rebranding, etc.);
- c. the specific products placed into the stream of commerce by the entity year by year and by brand or trade name;
- d. the name, positions and a brief description of the responsibilities of the person or persons serving the answering defendant and the entity simultaneously including the positions held with the entity and with the answering defendant.

ANSWER:

PPG employees have, from 1937 forward, from time to time served on the Board of Directors of Pittsburgh Corning Corporation. The following is a listing of such persons:

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
February 1961

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
H. B. Higgins		PPG	Director
D. C. Hill	Chairman	PPG	Director, President and Chief Executive Officer
F. T. Hughes		PPG	Vice President, General Manager
G. D. Macbeth		CGW	Honorary Vice President
W. C. Decker		CGW	Chairman of the Board
A. Houghton, Jr.		CGW	President
A. Houghton, Sr.		CGW	Chairman Executive Committee
R. Brittingham			

June 1961

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
K. Baumler	VP- Mfg.	--	--
F. R. Maston	Secretary	--	--
R. E. Doehla	Asst. Treas.	--	--
E. A. Heil	Asst. Sec.	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
April 1961

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
H. B. Higgins		PPG	Director
D. C. Hill	Chairman	PPG	Director, President and Chief Executive Officer
F. T. Hughes		PPG	Vice President, General Manager
G. D. Macbeth		CGW	Honorary Vice President
W. C. Decker		CGW	Chairman of the Board

A. Houghton, Jr.	CGW	President
A. Houghton, Sr.	CGW	Chairman Executive Committee
R. Brittingham		

June 1961

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP- Sales	--	--
K. Baumler	VP- Mfg.	--	--
F. R. Maston	Secretary	--	--
R. E. Doehla	Asst. Treas.	--	--
E. A. Heil	Asst. Sec.	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
April 1962

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
H. B. Higgins			
D. C. Hill	Chairman	PPG	Chairman of the Board, President
F. T. Hughes		PPG	Vice President and General Manager
G. D. Macbeth		CGW	Honorary Vice President
W. C. Decker		CGW	Chairman of the Board
A. Houghton, Jr.		CGW	President
A. Houghton, Sr.		CGW	Chairman Executive Committee
R. Brittingham			

June 1962

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP- Sales	--	--
K. Baumler	VP- Mfg.	--	--

F. R. Maston	Secretary	--	--
R. E. Doehla	Asst. Treas.	--	--
E. A. Heil	Asst. Sec.	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
April 1963

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
H. B. Higgins			
D. C. Hill	Chairman	PPG	Chairman of the Board, President
F. T. Hughes		PPG	Vice President and General Manager
G. D. Macbeth		CGW	Honorary Vice President
W. C. Decker		CGW	Chairman of the Board
A. Houghton, Jr.		CGW	President
A. Houghton, Sr.		CGW	Chairman Executive Committee
R. Brittingham			

June 1963

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
K. Baumler	VP - Mfg.	--	--
F. R. Maston	Secretary	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
April 1964

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
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R. Brittingham	Chairman		
D. C. Hill		PPG	Chairman of the Board, President
F. T. Hughes		PPG	VP
R. F. Barker		PPG	VP
G. D. Macbeth		CGW	Honorary VP
W. C. Decker		CGW	Chairman, Executive Committee
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1964

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
K. Baumler	VP - Mfg.	--	--
F. R. Maston	Secretary	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1965

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		
D. C. Hill		PPG	Chairman of the Board, President
F. T. Hughes		PPG	VP
R. F. Barker		PPG	Director, VP
G. D. Macbeth		CGW	Honorary VP
W. C. Decker		CGW	Chairman, Executive Committee
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1965

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
D. D'Eustachio	VP - Research	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1966

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		
D. C. Hill		PPG	Chairman of the Board and Chief Executive Officer
F. T. Hughes		PPG	VP
R. F. Barker		PPG	Director, President
G. D. Macbeth		CGW	Honorary VP
W. C. Decker		CGW	Chairman, Executive Committee
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1966

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
D. D'Eustachio	VP - Research	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1967

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		
D. C. Hill		PPG	Director
F. T. Hughes		PPG	VP
R. F. Barker		PPG	Chairman of the Board, Chief Executive Officer
G. D. Macbeth		CGW	Honorary VP
W. C. Decker		CGW	Chairman, Executive Committee
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1967

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
D. D'Eustachio	VP - Research	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1968

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		

D. C. Hill	PPG	Director
F. T. Hughes	PPG	VP
R. F. Barker	PPG	Chairman of the Board and Chief Executive Officer
G. D. Macbeth	CGW	Honorary VP
W. C. Decker	CGW	Chairman, Executive Committee
A. Houghton, Jr.	CGW	Chairman of the Board
A. Houghton, Sr.	CGW	Honorary Chairman

June 1968

OFFICERS

R. Brittingham	President	--	--
R. E. Buckley	VP - Inter.	--	--
J. H. Price, Jr.	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
D. D'Eustachio	VP - Research	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

August 1968

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		
J. H. Bierer			
D. C. Hill		PPG	Director
F. T. Hughes		PPG	VP
R. F. Barker		PPG	Chairman of the Board and Chief Executive Officer
W. C. Decker		CGW	Honorary Vice Chairman
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

August 1968

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
J. H. Price, Jr.	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
D. D'Eustachio	VP - Research	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1969

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
R. Brittingham	Chairman		
J. H. Bierer			
D. C. Hill		PPG	Director
F. T. Hughes		PPG	VP
R. F. Barker		PPG	Chairman of the Board and Chief Executive Officer
W. C. Decker		CGW	Honorary Vice Chairman
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1969

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
E. W. Holman	VP - Technical	--	--
J. H. Price, Jr.	VP - Sales	--	--
B. M. Stout	VP - Mfg.	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1970

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
J. H. Bierer R. F. Barker	Chairman	PPG	Chairman of the Board and Chief Executive Officer
F. T. Hughes		PPG	VP
D. C. Hill		PPG	Director
W. C. Decker		CGW	Honorary Vice Chairman
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1970

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
E. W. Holman	VP- Technical & Mfg.	--	--
J. H. Price, Jr.	VP - Marketing	--	--
B. M. Stout	VP - Asst. to Pres.	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1971

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
J. H. Bierer R. F. Barker	Chairman	PPG	Chairman of the Board and Chief Executive Officer
F. T. Hughes		PPG	VP
D. C. Hill			
W. C. Decker		CGW	Honorary Vice Chairman

A. Houghton, Jr.	CGW	Chairman of the Board
A. Houghton, Sr.	CGW	Honorary Chairman

June 1971

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
E. W. Holman	VP- Technical & Mfg.	--	--
J. H. Price, Jr.	VP - Marketing	--	--
B. M. Stout	VP - Asst. to Pres.	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION

April 1972

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
J. H. Bierer	Chairman		
R. F. Barker		PPG	Chairman of the Board and Chief Executive Officer
F. T. Hughes		PPG	VP
D. C. Hill			
W. C. Decker		CGW	Honorary Vice Chairman
A. Houghton, Jr.		CGW	Chairman of the Board
A. Houghton, Sr.		CGW	Honorary Chairman

June 1972

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
E. W. Holman	VP- Technical & Mfg.	--	--
J. H. Price, Jr.	VP - Marketing	--	--
B. M. Stout	VP - Asst. to Pres.	--	--

F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

OFFICERS AND DIRECTORS OF PITTSBURGH CORNING CORPORATION
September 1972

BOARD OF DIRECTORS

<u>NAME</u>	<u>PCC TITLE</u>	<u>CGW/PPG</u>	<u>CGW/PPG TITLES</u>
J. H. Bierer R. F. Barker	Chairman	PPG	Chairman of the Board and Chief Executive Officer
F. T. Hughes D. C. Hill		PPG	VP
J. A. Neubauer		PPG	Director, President and Chief Operating Officer
W. C. Decker A. Houghton, Jr.		CGW CGW	Honorary Chairman Chairman of the Board
A. Houghton, Sr. A. W. Dawson		CGW CGW	Chairman Emeritus Executive VP

September 1972

OFFICERS

J. H. Bierer	President & CEO	--	--
R. E. Buckley	VP - Inter.	--	--
E. W. Holman	VP - Technical & Mfg.	--	--
B. M. Stout	VP - Asst. to Pres.	--	--
R. W. Gaenzle	VP - Marketing	--	--
F. R. Maston	Secretary Treasurer	--	--
R. E. Doehla	Asst. Treasurer	--	--
E. A. Heil	Asst. Secretary	--	--

EVER SELL ASBESTOS

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, or Defendant's subsidiary);
- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
 - 1. The trade or brand name.
 - 2. Its identification number (model, serial number, etc.)
 - 3. The time period it was manufactured, mined, marketed, distributed or sold.
 - 4. Its physical description including color, general composition, and form.
 - 5. A detailed description of its intended use and purpose.
 - 6. A detailed description of the type package in which it was sold, listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.
 - 7. The percent of asbestos which it contained.
 - 8. The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite).
- (c) The time period during which each of these products were on the market;
- (d) The material components/ingredients of each such product, giving specific or approximate percentage

both by weight and by volume of each material component/ingredient (this interrogatory is not limited to the asbestos component of the product but seeks information as to the nature, weight and volume of non-asbestos ingredients, as well) of each such product;

- (e) How each of these asbestos-containing product can be distinguished from those of competitors;
- (f) A description of the physical appearance of such product;
- (g) A detailed description of the intended uses.

ANSWER:

PPG objects to Interrogatory No. 5 insofar as it seeks information about products to which plaintiffs do not claim exposure as not being calculated to lead to the discovery of relevant information. Without waiving this objection, PPG answers as follows: PPG is unable to vouch for the contents of all products made or sold by PPG in its more than 110 year corporate history. PPG is also unable to ascertain whether some products at some times may have contained asbestos containing components.

PPG has never manufactured an asbestos containing thermal insulation product, and is not a member of the "asbestos industry" in the sense typically used in asbestos litigation. However, from 1969-1971, PPG purchased and resold, under an oral rebranding agreement, a limited amount of asbestos containing thermal insulation manufactured by Fibreboard Corporation, under the trademark Pyrocal. The Fibreboard Pyrocal product was designed, manufactured, processed, boxed, patented, labeled and shipped by Fibreboard Corporation directly to the customer. Such product was resold by PPG without any further testing, change or alteration, or with any change in the container or labeling. To the best of PPG's knowledge, the Fibreboard Pyrocal product was supplied by Fibreboard at all relevant times with the following warning label:

"Caution. This product contains asbestos fiber. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by the U.S. Bureau of Mines."

To the best of PPG's knowledge and information, this label was placed on Fibreboard's products starting in 1966, before the oral rebranding agreement took effect.

For an unknown period prior to 1962 through 1962, PPG manufactured a sound-deadener (no trade name) which contained a minimal amount (less than 5%) of chrysotile asbestos. To the best of PPG's knowledge, this specialty product was manufactured in very limited amounts and was used as a sound-deadener on the interior of housings for steam turbines. To the best knowledge of PPG, the asbestos in this product was encapsulated and non-friable. From 1965-1975, this sound-deadener product was manufactured by another entity (unrelated to PPG) and distributed by PPG.

In addition, for a period of time, PPG offered for sale as one of a number of possible configurations an insulated spandrel window framing system with the trademark Insulated Spandrelite that, upon request from a customer, contained an asbestos containing cement board inside the unit. To PPG's belief, the majority of the Insulated Spandrelite units sold by PPG contained either fiberglass or mineral wool insulation. PPG believes that such an option was available from approximately 1974-1977, but has not located records of to whom, if anybody, such units were sold; how much was sold; or any more definite information of the time period involved. The Insulated Spandrelite unit described above was fabricated by PPG before installation, was installed as fabricated without change at a job site, and as used in construction was self-contained and the asbestos containing cement board was not exposed to the atmosphere.

Between 1974 and 1976, PPG was a distributor of an asbestos-containing architectural wall board manufactured by a Belgian company called Eternit. PPG has not located records of the sales of this product, or how much was distributed by PPG. The trade names for this product were Flexweld and Glasweld. At all times these products were stamped with the OSHA mandated warning label and precautionary instructions.

PPG does not presently have knowledge of any other products manufactured, sold, or distributed by PPG for industrial use that contained asbestos. PPG has never been engaged in the mining of asbestos.

6. Does Defendant or any of its subsidiary companies claim that any patent would cover any product listed in answer to Interrogatory No. 5? If so, please state the following:

- (a) The date of each patent;
- (b) The date same was issued;

- (c) The number of each patent application that is pending.

ANSWER:

PPG knows of no such patents.

7. Have any of the products listed above in answer to Interrogatory No. 5 been altered in chemical composition since first being marketed? If so, please state the following:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER:

See formulation sheets for the sound deadener product, which reflects some changes in the product. PPG has no further information on any of the products listed in the Answer to Interrogatory No. 5.

8. Have any of the asbestos-containing products listed in response to Interrogatory No. 5 ever been marketed, distributed, packaged, labeled, and/or sold by any other company or business? If so, please state the following:

- (a) The name and address of each such company.
- (b) The names and address of Defendant's distributors in Ohio and Illinois since 1940.
- (c) The date of each sale.

- (d) The name of the person at each location with whom you primarily dealt.
- (e) A list of all asbestos-containing products that you sold to each location from 1945 to 1980.
- (f) The amount of each asbestos product sold to each location during this period.
- (g) Please identify all documents relating to this distributor for the particular location.

ANSWER:

See Sales Chart for the Fibreboard Pyrocal product, attached. PPG has no information about any other product listed in answer to Interrogatory No. 5.

8.01 Has this defendant ever purchased asbestos-containing products from any other defendant?

ANSWER:

PPG is sure that, over the course of a 110 year history of the company, it has purchased asbestos-containing products for installation in its manufacturing facilities, but PPG has no way, at this remove, from identifying what company's products were purchased.

8.02 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each defendant from whom this defendant purchased any asbestos-containing product;
- (b) list each product purchased from each co-defendant;

- (c) list the dates of each purchase of asbestos-containing products from each co-defendant.

ANSWER:

See Answer to Interrogatory No. 8.01.

8.03 Has this defendant ever sold asbestos-containing products to any other defendant?

ANSWER:

See Sales Chart for the Fibreboard Pyrocal product, attached. PPG has no information about any other product listed in answer to Interrogatory No. 5.

8.04 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each defendant to whom this defendant sold any asbestos-containing product;
- (b) list each product sold to each co-defendant;
- (c) list the dates of each sale of asbestos-containing products to each co-defendant.

ANSWER:

See answer to Interrogatory No. 8.03.

8.05 Has Defendant engaged in the manufacture and/or sale and/or distribution and/or marketing and/or supply and/or purchase and/or use of non-

asbestos-containing products for use in connection with temperatures above 125°

Fahrenheit since 1930. If so, please state:

- (a) the date such activity began;
- (b) the years during which such activity took place;
- (c) the date when such activity was terminated;
- (d) if such activity was terminated, the reason(s) why;
- (e) the geographical area into which you claim the product(s) were sold, purchased, or used;
- (f) identify the organizational unit of defendant so engaged;
- (g) the site(s) at which each such product was manufactured;
- (h) the material components of each such product, giving specific or approximate percentage both by weight and by volume of each material component of each such product;
- (i) the temperature ranges for which each product(s) was intended to be used;
- (j) the product's generic name;
- (k) the product's trade or brand name;
- (l) the container in which the product was shipped (i.e., paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings

which appeared on the product, as well as a description of the package used, the dates that type of package was used, and any logos, product names, trademarks, etc. which appeared on the package;

- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

ANSWER:

PPG objects to Interrogatory No. 8.05 as burdensome, harassing and not calculated to lead to the discovery of admissible evidence, as it asks about products unrelated to plaintiff's claims of injury.

8.06 Did Defendant ever market or distribute any asbestos-containing product manufactured in whole or in part by someone else? If so, please state the following for each such product:

- (a) the name and address of the manufacturer;
- (b) the product's trade and brand name;
- (c) the organizational unit of Defendant who did so;
- (d) date(s) beginning, ending and during which the marketing or distributing took place;

- (e) whether the product was distributed through the same channels as those used for products manufactured by Defendant, and if not, please explain the exact channels of distribution;
- (f) identify all documents relating the marketing or distribution.

ANSWER:

See Answer to Interrogatory No. 5.

8.1 Does Defendant have reason to believe that any of the asbestos-containing products listed in response to Interrogatory No. 5 were used at any of the sites listed on Exhibit A, attached hereto. If your answer is "yes", please state:

- (a) The basis of your answer.
- (b) Please state which of Defendant's asbestos-containing products listed in Interrogatory No. 5 were used at each job site listed on Exhibit A.

ANSWER:

No.

8.2 For each company or business that Defendant knows may have marketed, distributed, installed, and/or sold, those products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A.

- (a) The name and address of each such company;

- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from 1950 to 1974.
- (e) Please identify all documents relating to the sales to each such company.

ANSWER:

None.

8.3 If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed, distributed, installed and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of those companies, please state the following:

- (a) Name and address of each such company;
- (b) The dates of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt;
- (d) The names of the asbestos-containing products that Defendant marketed,

distributed, and/or sold to each such company from 1950 to 1974.

ANSWER:

None.

8.4 Does Defendant have records and/or any knowledge that reflects sales of their asbestos-containing products to any of the sites listed on Exhibit A, attached hereto? If so, please state the following as to each job site listed on Exhibit A:

- (a) The names and last known addresses of those people with such knowledge.
- (b) The location of such records.

ANSWER:

Not applicable.

9. Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

- (a) The name and last known address of each such representative and whether they are still employed by Defendant;
- (b) The period of time they acted as your representative;
- (c) Their general responsibility as to each facility;

- (d) Whether that person is still alive; and
- (e) Any documents relating, referring or pertaining thereto.

ANSWER:

No.

9.1 Identify all managers and sales personnel responsible for your sales or installation of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

ANSWER:

Not applicable.

10. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products? If so, please state:

- (a) The name of each subdivision;
- (b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and
- (c) Whether said division or subsidiary conducted such business at any of the sites listed on Exhibit A, from 1940 to 1975? If so, please state the following as to each job site listed on Exhibit A:
 - (1) The dates of such contracts;

- (2) The specific asbestos-containing products that were used or removed in each contract.

ANSWER:

No.

11. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

ANSWER:

No.

12. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER:

See Answer to Interrogatory No 5. In addition, prior to 1962 the sound deadener product was produced by PPG at a facility on the North Side of Pittsburgh, which was demolished in 1962-1963.

13. Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

- (a) The name of the company manufacturing the asbestos products under such agreement;
- (b) The trade name affixed to such products;
- (c) The periods of time covered by each such agreement;
- (d) The volume (in dollars amounts) of each such transaction;
- (e) The purchaser of such products;
- (f) Does Defendant currently have in its possession any of the writings or contracts concerning such rebranding agreement?

ANSWER:

See Answer to Interrogatory No 5.

13.1 Have you ever owned or operated a business or portion thereof which engaged in construction, erection or tear out of furnaces, pipes, boilers, turbines, lehrs, ovens, kilns, etc? If so, please state:

- (a) the same of said business;
- (b) the date of commencing business and cessation of business, if applicable;
- (c) type of construction or tear out performed;
- (d) state whether said business installed or supplied asbestos-containing products on the furnaces, pipes, boilers, turbines, leers, etc., i.e., gaskets, pipecovering, block, cement, rope, cloth, clothes, etc.,

containing asbestos, asbestos pipe, board, etc.;

- (e) state the trade name and/or manufacturer of any asbestos-containing product which you installed or supplied to any site on Exhibit A.
- (f) provide the dates for the applicable construction, installation or tear-out project.

ANSWER:

No.

13.2 Do you have, within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;
- (b) the present location and custodian of each such package;
- (c) the date or approximate date on which each such package was produced.

ANSWER:

No.

INFORMATION ABOUT DESIGN/TESTING

14. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed above in answer to Interrogatory No. 5?

ANSWER:

Unknown.

15. As to each product listed in response to Interrogatory No. 5, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. (In answering this question, give particular reference as to whether or not the materials were to be sawed or cut on the job, blown into confined areas, mixed with water in a cement or paste.)

ANSWER:

For the Fibreboard Pyrocal product, and for Glasweld and Flexweld, unknown. As for sound deadener, the product was applied by metal fabricators as a paste to metal turbine housings, which solidified to a cement-like hardness. As for the Insulated Spandrelite, this came as an enclosed unit and no handling was necessary.

16. Based upon the material contents of the asbestos-containing products, the method of manufacturing, and the method of application, please state which products listed in Interrogatory No. 5 could be applied by a worker without creating dust.

ANSWER:

Sound deadener. As to the remaining products, unknown.

17. Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the products listed in answer to Interrogatory No. 5? If so, please:

- (a) List each such written material or document;
- (b) Identify the person or persons presently in possession of each such document;
- (c) State where each such document is located.

ANSWER:

See product formulation sheets for sound deadener. PPG has no other documents.

18. Prior to releasing the products listed in Interrogatory No. 5 for sale and usage, were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER:

No.

18.1 Prior to releasing any products for sale and usage (whether asbestos-containing or not), were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER:

PPG objects to Interrogatory No. 18.01 as burdensome, harassing and not calculated to lead to the discovery of admissible evidence, as it asks about products unrelated to plaintiff's claims of injury.

19. Does Defendant have or control any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character relating to the testing of the products listed in Interrogatory No. 5 hereinabove?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;
- (c) State where each such document is located.

ANSWER:

No.

20. Were any design changes or modifications made as a result of such

tests listed in answer to Interrogatory No. 18 hereinabove? If so, please state:

- (a) The trade name of the product changed or modified;
- (b) The nature of the change made and the date of such changes or modifications;
- (c) The name, address, and job classification of each person in charge of making a change.

ANSWER:

Not applicable.

21. After releasing for sale, distribution or marketing the products listed in answer to Interrogatory No. 5, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials and/or products?

- (a) The names of the products tested and the dates of said tests;
- (b) The name, address, and job classification of each person and/or agency conducting said tests;
- (c) The results of said tests;
- (d) Whether, as a result of any tests conducted, any products were removed from the market;
- (e) The names of all products removed from the market as a result of said tests.

ANSWER:

No.

22. Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

- (a) The dates and nature of such studies;
- (b) The names and addresses of persons conducting such studies;
- (c) The purpose of such studies;
- (d) Identify and list those persons to whom such reports were given and the date of such dissemination;
- (e) State any publication or other written dissemination of the results of such studies;
- (f) State the nature of any action to eliminate or minimize the inhalation of asbestos dust fibers; and
- (g) Attach a copy of reports based upon such studies.

ANSWER:

PPG did not perform, direct to be performed, finance, or sponsor any such studies or tests. However, PPG did contribute financially to some studies by IHF on fiberglass materials which also included some research on asbestos. PPG does not know when or under what circumstances someone with the company may have received the results of any such studies. These studies were

performed in the late 1960's and early 1970's and were published. A copy of this study is attached.

INFORMATION ABOUT SAFETY

23. Before placing in the market the asbestos-containing products that Defendant, mined, manufactured, sold, marketed, installed or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

- (a) The date of said studies;
- (b) What studies were done; and
- (c) The titles of each study.

ANSWER:

No.

24. Please state whether or not Defendant ever conducted or caused to be conducted any tests in the field (where asbestos-containing products were applied, removed or utilized) to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees, or other workers removing and/or tearing out asbestos-containing products, and/or other workers in the vicinity thereof? If so, please identify:

- (a) The date, place and nature of each and every test;
- (b) The particular asbestos-containing products to which each test applied;

- (c) The results of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site; and
- (d) The persons to whom the results said tests were given and the date of such dissemination.

ANSWER:

Not to PPG's knowledge.

25. Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

- (a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;
- (b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained;
- (c) What information was disseminated within Defendant's company, or its subsidiary or predecessor regarding such adverse consequences or effects;
- (d) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- (e) The name, address and job classification of the custodian of such information.

ANSWER:

PPG states that in an organization of PPG's size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. PPG believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To PPG's present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is PPG's present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos do not result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published threshold limit values for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and the specific diseases listed in this Interrogatory. It is defendant's present information that credible medical experts are questioning whether "asbestos" causes the other forms of cancer listed in this Interrogatory and others are questioning whether all types of "asbestos" pose the same risks. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

PPG believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the mid-1960's.

26. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma, lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER:

See Answer to Interrogatory No. 25.

27. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER:

PPG has employed, at various times, the following as Medical Directors. These individuals were not employed specifically for research, investigation or study concerning asbestos or asbestos-related diseases; however, such persons may have dealt with such issues while employed at PPG.

Medical Directors

LB. Grant, 506 Ridgewood Dr., Belview, NE 68005
F.R. Jones, deceased
C.B. Meyers, deceased
George W. Lovett, 10829 North 23rd Street, Phoenix, AZ 85028
Alberto Colombi, One PPG Place, Pittsburgh, PA 15272

In addition, PPG has had physicians at other individual locations throughout the country.

PPG has employed, at various times, the following as Industrial Hygienists. These individuals were not employed specifically for research, investigation or

study concerning asbestos or asbestos-related diseases; however, such persons may have dealt with such issues while employed at PPG

Industrial Hygienists

Zeb Bell, One PPG Place, Pittsburgh, PA 15272

James DeStefano, 531 Deauville Dr., Monroeville, PA 15146

Robert Rubino, One PPG Place, Pittsburgh, PA 15272

Charles Powell 1897 Tilton Drive, Gualala, CA 15445

In addition, PPG has had industrial hygienists at other individual locations throughout the country.

28. As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

ANSWER:

See Answer to Interrogatory No. 27.

29. Please state if any medical office or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER:

PPG knows of no such recommendations or suggestions made to PPG relating to manufacturing facilities; but PPG is aware that Dr. Lee B. Grant made

recommendations and suggestions to Pittsburgh Corning as a medical consultant to Pittsburgh Corning See documents produced by PPG.

30. Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 and 1975.

ANSWER:

PPG believes that individual employees may have subscribed to various medical journals over the years, particularly PPG's Medical Director during this time, L.B. Grant, M.D.; however, PPG has not maintained a record of such subscriptions. PPG is still attempting to determine what medical journals to which he may have subscribed; so this interrogatory answer may be supplemented if additional information is developed. PPG believes that Dr. Grant was a subscriber to journals in the field of occupational medicine. Please see Dr. Grant's deposition of April 1 and 2, 1997 in Gladys Forrestier, et us., v. ACandS, Inc., et al. In the 58th Judicial District Court of Jefferson County, Texas for Dr. Grant's memory of these matters.

30.1 Please state whether Defendant, its medical officer or industrial hygienist or medical consultant or physicians were ever involved in testing or received literature or correspondence from the Mellon Institute.

ANSWER:

Unknown.

30.2 Has any engineer, industrial hygienist or physician in your employ been a member in any professional group, trade group or any of the following groups:

Asbestos Textile Institute

National Insulation Manufacturers Association
Thermal Insulation Manufacturers Association
Quebec Asbestos Mining Association
Asbestos Information Association
Industrial Health Foundation
Industrial Hygiene Foundation
Iron and Steel Institute
National Safety Council
Refractories Institute
Air Hygiene Foundation of America, Inc.
Sprayed Mineral Fiber Association

If the answer is yes, state the following:

- (a) The name of the group or groups in which the individual(s) were members;
- (b) The name and position individual(s) within the Defendant, as defined, who were members;
- (c) The years the individual(s) were members of the groups;
- (d) Whether the Defendant paid the individual(s) dues or membership fees or reimbursed the individual(s) for dues or membership fees in the group.

ANSWER:

PPG cannot ascertain which memberships individual employees may have had to any trade organization. However, PPG had corporate memberships in the Industrial Health Foundation (earlier called the Industrial Hygiene Foundation) from 1937 to date; is a member of the National Safety Council, and was a member of NIMA from 1958-1973 as a manufacturer of fiberglass insulation.

31 . State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.

ANSWER:

To the best of PPG's knowledge, information and belief, the answer to this question is none.

32. For each test described in Interrogatory No. 31, please give the name of the person conducting the test, the date of the test, and attach true copies of any documents, including but not limited to, reports, findings or memoranda concerning such tests or studies.

ANSWER:

Not applicable.

33. Please state the year that Defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee/official of the company receiving such advice.

ANSWER:

In an organization of PPG's size and duration it is impossible to determine when a responsible employee first learned of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists. PPG believes that its knowledge may have come from employees reading publications but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom. Although an exact date is unknown, PPG believes that PPG was aware of TLV's as early as or before 1962.

33.1 State whether this defendant at any time caused to be conducted on any job site, any air sampling, dust counts, tests or other activities to determine air quality or worker safety. If your answer is in the affirmative, please indicate:

- (a) the date of any such air samples, tests, or activities;
- (b) by whom such activities were performed;
- (c) where such activities were performed;
- (d) the results of any such activities.

ANSWER:

PPG has conducted air monitoring at its own facilities. PPG objects to answering this Interrogatory as to its own facilities as burdensome, harassing and not calculated to lead to the discovery of admissible evidence.

34. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;
- (c) The name(s) of the librarian(s) since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER:

Objection. This Interrogatory is overly broad and burdensome; not limited to the appropriate scope of relevancy to this lawsuit, is not reasonably

calculated to lead to the discovery of admissible evidence, and is vague, oppressive, unlimited in time and ambiguous. Without waiving this objection, PPG states that it never maintained such a facility. Additionally, PPG has no way of knowing which employees collected what literature over its 110 year corporate history.

35. Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.

ANSWER:

No.

36. When was Defendant first aware of reports of studies of the Trudeau Foundation at Saranac Lake, New York, entitled "Effects of the Inhalation of Asbestos Dust in the Lungs of Asbestos Workers" by A.J. Lanza, Assistant Medical Director published in the J. Public Health Report, Vol. 50, No. 1, dated January 4, 1935 ("Lanza Report")?

ANSWER:

PPG does not know if any individual employed by PPG was ever aware of these reports before becoming aware of such studies through the course of litigation.

36.1 Did you ever contract with Saranac Laboratories to study the hazards of any dust producing product manufactured by you (whether asbestos-containing or not)? If so, identify by date and author all documents concerning or any way related to such study.

ANSWER:

PPG objects to Interrogatory No. 36.1 as burdensome, harassing and not calculated to lead to the discovery of admissible evidence, as it asks about products unrelated to plaintiff's claims of injury.

36.2 Did you ever contract with Saranac Laboratories to analyze dust or products? If so, identify by date and author all documents concerning or any way related to such analysis.

ANSWER:

PPG objects to Interrogatory No. 36.2 as burdensome, harassing and not calculated to lead to the discovery of admissible evidence, as it asks about products unrelated to plaintiff's claims of injury.

37. Please state whether the Defendant at any time has been a member of any "trade organization" or "trade association" composed by other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER:

See Response to Interrogatory No. 30.2.

38. With respect to each trade organization or association listed in answer to Interrogatory No. 37, please state whether the minutes of the group's meetings and any correspondence between the members of such groups concerning the hazards of asbestos exposure are available.

ANSWER:

Yes.

39. Please identify by name the technical and trade association periodicals to which the Defendant subscribed, and state whether Defendant had knowledge of any articles being printed, or withheld from printing, in said periodicals pertaining to the potential hazards of asbestos. If so, please state the following:

- (a) The title of each such article;
- (b) The periodical in which each such article was published;
- (c) The date each such article was published;
- (d) A detailed explanation of the reason for withholding any such article for printing;
- (e) Produce documentation which refers, alludes or mentions articles which were withheld for publication.

ANSWER:

PPG received copies of the IHF Digest. PPG knows of no studies withheld from publication by this organization.

40. Please state whether, prior to 1975, the Defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

ANSWER:

PPG is certain that individuals employed by PPG with responsibilities in the area of occupational health attended such meetings before 1975; but PPG has no way of determining when or where.

WARNINGS/SALES PROMOTION

41. As to each product listed in response to Interrogatory No. 5, please state whether Defendant, at any time, published and/or distributed any printed materials, including but not limited to brochures, pamphlets, catalogs, packagings or other written materials of any kind or character that contain any warnings, cautions, caveats or directions concerning the possible health effects of the products on a person. If so, please state as to each product:

- (a) The name of each relevant product;
- (b) The wording of each such warning;
- (c) A description of each such printed material;
- (d) The method used to distribute the warning to persons who are likely to use the products;
- (e) The date each such warning was issued;
- (f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
- (g) Please attach a copy of the warning and date said warning was issued;
- (h) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or

containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER:

See Answer to Interrogatory No. 5. Also, see brochures attached.

42. Has sales material been prepared by Defendant or its agents for purposes of marketing or advertising the asbestos products listed in answer to Interrogatory No. 5? If so, please state:

- (a) The name and address of each person or entity who prepared same;
- (b) The name, address and job title of each person who presently has possession of same;
- (c) The date same was prepared;
- (d) The media used to disseminate the sales material.

ANSWER:

See Answer to Interrogatory No. 5 and 41.

43. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 5 should be used or maintained by the ultimate user or those working in facilities or at job sites where the product was used, installed or removed, including, but not limited to, those sites listed on the job site list attached as Exhibit A. If so, please state the following:

- (a) The name, address and job classification of each person who prepared same;
- (b) The name, address and job classification of each person who presently has possession of same;
- (c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

ANSWER:

See Answer to Interrogatory No. 5 and 41.

44. Was any written material of any kind prepared by Defendant and distributed to those individuals listed in response to Interrogatory No. 9? If so, please state the following:

- (a) Identify the written material by content and date;
- (b) To whom was it delivered.

ANSWER:

No.

45. Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or applying same? If so, please state the following:

- (a) The date that Defendant first determined that another product could be used in place of asbestos;
- (b) The chemical of the substitute;
- (c) Whether the substitute is suitable for the purpose for which they are to be used;

- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER:

See answer to Interrogatory No. 5.

46. Did Defendant give any warnings to any individuals at the sites listed on Exhibit A, including any individuals who owned, operated, or managed the facilities at the sites listed on Exhibit A, regarding the potential health hazards of any product listed in response to Interrogatory No. 5. If yes, please state:

- (a) Name of person most knowledgeable about this communication.
- (b) Name of person at the sites listed on Exhibit 1, attached hereto most knowledgeable about this communication.
- (c) Dates of each communication.
- (d) Contents of each communication.

ANSWER:

Not applicable.

KNOWLEDGE OF PREVIOUS INJURIES

47. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
- (b) The disease alleged in each such claim;
- (c) A brief summary of the disposition of each such claim; and
- (d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

ANSWER:

No.

47.1 Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

ANSWER:

PPG has no such documents.

47.2 Has any person or company from which you purchased asbestos-containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

ANSWER:

Not to PPG's knowledge.

47.3 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

ANSWER:

Not applicable, PPG was not a manufacturer of asbestos-containing products.

47.4 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;
- (b) state when such action was taken;
- (c) state what written material exists related to such action;
- (d) state the names, job titles and last known address of the individuals who undertook such actions.

ANSWER:

See PPG's Asbestos Health Manual for 1973, attached. In addition, PPG has long had a policy of making respiratory protection available to persons working in dusty conditions.

48. Did Defendant receive notice prior to 1968 that any person was claiming injury as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;
- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney representing the individuals making such claims;
- (f) The style and court number of each such claim;
- (g) The resolution of each claim.

ANSWER:

No.

48.1 Describe the method by which you have maintained records concerning the manufacturer, sale, supply, distribution, use, advertising, delivery and/or installation or tear-out of each of asbestos-containing products.

For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g., boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacturer, sale, supply, distribution, use, advertising, delivery, and/or

installation or tear-out which such record keeping system covers;

- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

ANSWER:

Defendant objects to this interrogatory because it is overly broad and seeks irrelevant information which is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection defendant states that PPG has a corporate document retention policy manual which is to be followed by all employees on a regular basis. This document retention manual will be produced. Pursuant to PPG's document retention policy, sales records for any of the products listed in Answer to Interrogatory No. 5 have long ago been discarded. However, PPG does have a sales summary for the Fibreboard Pyrocal product, derived from sales records, a copy of which is attached

48.2 State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

ANSWER:

See Answer to Interrogatory No. 48.1.

48.3 For all documents, other than invoices, work orders and/or purchase orders, which relate to matters relevant to the all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER:

See Answer to Interrogatory No. 48.1.

48.4 For all invoices, work orders and/or purchase orders, which relate to matters relevant to the all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER:

See Answer to Interrogatory No. 48.1.

PLAINTIFF/DECEDENT

49. Has Defendant obtained statement from any witnesses including the Plaintiffs? If so, please:

- (a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER:

No.

50. Do you contend that the Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set out in detail in what respect the product was improperly used.

ANSWER:

PPG contends that plaintiff used no such products.

51. As to the sites listed on Exhibit A, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other than asbestos which contributed or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- (a) The facts upon which you rely;
- (b) The identity of the sources upon which you rely which substantiate these facts.

ANSWER:

Unknown.

RESPIRATORS

52. Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so, state:

- (a) When the respirator was sold;
- (b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- (c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers;
- (d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;
- (e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

ANSWER:

PPG is not a manufacturer of respirators, masks or other breathing devices. However, PPG contends that appropriate devices, properly used, would reduce any risk inherent in exposure to asbestos dust and fibers, and, as the warning label on the Fibreboard product Pyrocal stated, the user of such product was encouraged to use a U.S. Bureau of Mine safety-approved respirator for such purpose.

53. Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

- (a) Their identity, last known address;

- (b) The subject matter on which the expert is expected to testify;
- (c) The expert's specific conclusion and specific opinions and the specific basis therefore;
- (d) The expert's qualifications to render the opinions set forth above;
- (e) Whether any person identified in sub-paragraph (a) above has provided a report or other documentation to you, and if so, identify such document or report;
- (f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and
- (g) Describe in detail the education and work history of, and identify any books, treatises, article, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to sub-paragraph (a) above. Alternatively, in lieu, of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.

ANSWER:

PPG has not yet decided who will testify as an expert witness at the trial of this matter.

54. Please state the name and last know address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

ANSWER:

See Answer to Interrogatory No. 53.

55. Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

ANSWER:

Yes.

55.1 For each and every affirmative defense asserted in the answering defendant's Answer to Plaintiffs' Complaint, the Cross-Claims or Counter-Claims of any party against this answering defendant state:

- (a) the facts upon which the answering defendant relies for each and every affirmative defense;
- (b) each and every document which will be offered to prove each and every affirmative defense; and
- (c) each and every witness who will testify in support of each and every affirmative defense.
- (d) the substance and subject matter of the anticipated testimony of each witness identified in the preceding response.

ANSWER:

PPG will supplement this answer at the conclusion of discovery.

56. Does Defendant have policies of insurance that might cover the claims that have been made by the Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

ANSWER:

Yes. PPG will make available its insurance policies at a mutually convenient time and place.

56.1 Have you ever been involved in any litigation concerning potential insurance coverage for asbestos products liability matters? If so, please state:

- (a) the case caption, court and date of filing of each case in which you have been involved;
- (b) whether you were plaintiff or defendant;
- (c) a brief statement of the issues;
- (d) identify by date, author and recipient(s), (including recipients of carbon copies) all documents listed as exhibits by either party in this litigation;
- (e) identify by deponent and date all individuals who were deposed in these cases;
- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;
- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

ANSWER:

PPG Industries, Inc. v. Aetna, U.S. District Court for the Western District of Pennsylvania, No. 95-340

Pittsburgh Corning Corp. v. Travelers Indemnity Co., et al., U.S. District Court for the Eastern District of PA, No. 84-3985

Commercial Union Insurance Company v. Pittsburgh Corning Corporation, et al., U.S. District Court for the Eastern District of Pennsylvania, No. 81-2129.

Continental Casualty Company v. PPG Industries, Inc., et al., U.S. District Court for the Northern District of Illinois, Eastern Division, No. 87-0269

Continental Casualty Company v. PPG Industries, Inc., et al., U.S. District Court for the Northern District of Illinois, No. 86-6076

57. Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

ANSWER:

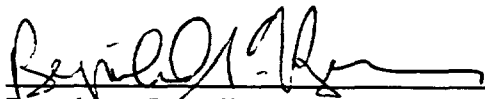
Unknown at this time.

58. State the last date that this Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

ANSWER:

See Answer to Interrogatory No. 5.

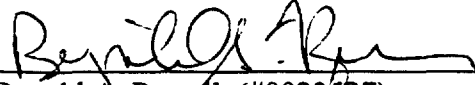
As to objections:

A handwritten signature in black ink, appearing to read 'Donald A. Powell', written over a horizontal line.

Donald A. Powell
Reginald S. Kramer

Attorneys for Defendant,
PPG Industries, Inc.

Respectfully submitted,



Donald A. Powell (#0023527)

Reginald S. Kramer (#0024201)

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(412) 281-7272

Attorneys for Defendant,

PPG Industries, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Answers to Plaintiffs' Master Set of Interrogatories Propounded to PPG Industries, Inc., was served upon Steven D. Wolens, Esq. and Ladd Gibke, Esq., Attorneys for Plaintiffs, at Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281, by regular U.S. Mail, first-class postage prepaid, this 10th day of September, 1997.



Donald A. Powell (#0023527)

Reginald S. Kramer (#0024201)

Attorneys for Defendant,

PPG Industries, Inc.

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

ANTHONY MARIO GRECO et al., : CASE NOS. 323629-323678
: (HANNA, J.)
Plaintiffs, :
VS. : IN RE: ALL BARON & BUDD
: ASBESTOS CASES
A-BEST PRODUCTS COMPANY, et al., :
Defendants. :

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF ALLEGHENY

} §§:

I, H. Kennedy Linge, Associate General Counsel of PPG Industries, Inc., a Pennsylvania corporation, being first duly sworn, depose and say, I am authorized to make this Verification on behalf of PPG Industries, Inc., and while I have no personal knowledge, based on review of records and information received, the statements made in the Answers to Plaintiffs' Master Set of Interrogatories Propounded to PPG Industries, Inc. are true and correct.

FURTHER THE AFFIANT SAYETH NOT.

H. Kennedy Linge

H. Kennedy Linge
Associate General Counsel
PPG Industries, Inc.

SWORN to and subscribed
before me this 26 day
of August, 1997.

Jeanette E. Mooney
NOTARY PUBLIC

Notarial Seal
Jeanette E. Mooney, Notary Public
Mt. Oliver Boro. Allegheny County
My Commission Expires April 1, 2000
Member, Pennsylvania Association of Notaries