

**PLAINTIFF'S
EXHIBIT**

GF-653

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR DADE
COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 80-9227

JOHN L. GORDON, et ux.,)

Plaintiffs,)

vs.)

JOHNS-MANVILLE SALES)
CORPORATION, et al.,)

Defendants.)

GAF CORPORATION ANSWERS TO
PLAINTIFFS INTERROGATORIES

COMES NOW, Defendant GAF Corporation by and through
its undersigned attorney and files its answers to Plaintiffs
Interrogatories filed March 6, 1981, as follows:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the
foregoing Defendant, GAF Corporation Answers to Plaintiffs
Interrogatories was mailed this 17th day of April, 1981, to
all counsel on the attached mailing list.

FOWLER, WHITE, BURNETT, HURLEY,
BANICK & STRICKROOT, P.A.
Attorneys for GAF Corporation
City National Bank Building
5th Floor
25 West Flagler Street
Miami, Florida 33130
(305) 358-6550

By: Thomas F. Martin
Thomas F. Martin

PRELIMINARY STATEMENT

GAF Corporation rejects the Preliminary Statement of the Plaintiff. GAF CORPORATION answers these Interrogatories in accordance with, and only in accordance with, the Florida Rules of Civil Procedure.

Proposed Answers:

1. On May 26, 1967, GAF merged with the Ruberoid Co., a New Jersey Corporation. Ruberoid began the manufacturer of industrial thermal insulation products containing asbestos in late 1920's or early 1930's.

2a, c and d.

"Calsilite". A high temperature pipe covering and built-in block containing approximately 10 percent amosite asbestos fiber and the remaining consisting of hydrous lime silicate and diatomaceous earth. Calsilite was manufactured at Gloucester, New Jersey, from the early 1940's until mid 1970 at which time GAF commenced the production of asbestos-free Calsilite ("Calsilite II").

Calsilite was intended to withstand up to 1,200 degrees Fahrenheit.

"115" and "214 Insulating Cements". Known generically as 7M and 7K cements, respectively, these insulating cements were composed entirely of chrysotile asbestos fibre. These cements were manufactured at Hyde Park, Vermont, from 1936, through September 1975.

"T/NA-100" Insulation Jacketing. A two-ply, laminated product consisting of a layer of asbestos paper in which chrysotile asbestos fibers were bonded with Neoprene and a layer of polyvinyl fluoride (Tedlar) plastic film attached by adhesive on one side. T/NA-100 was manufactured at South Bound Brook, New Jersey, from 1962 to September 1971.

TNA-100 was designed to withstand temperatures of 100 to 200 degrees Fahrenheit.

Asbestos Paper and Millboard. Chrysotile insulating paper, used as a jacketing or pipe wrap; manufactured at Erie, Pennsylvania, from approximately 1928. Millboard was used primarily as an industrial fire barrier.

Most Ruberoid and GAF industrial thermal insulation products were sold in corrugated cardboard boxes bearing the companies' respective names or "logos". The insulating cement was sold in heavy duty bags. For warning language: See Answer to Interrogatory No. 7. The specific descriptive language, if any, appearing on the package is unknown, except to the extent that the trade name of the product did appear thereon.

- 2b. Calsilite, 10% amosite and 2% chrysotile fiber; 115 and 214 Insulation Cements, 100% chrysotile fiber; T/NA-100 Insulation Jacketing, 40% chrysotile fiber; Asbestos Paper and Millboard, asbestos fiber content varies from 20% to 40% chrysotile.
- 2e. Dry ingredients, principally asbestos fibers, silica sand and Portland cement, are measured and mixed with water. The mix or slurry is piped to a series of vats, in each of which a cylinder covered with wire mesh rotates slowly. As the cylinder turns, a layer of fibers and cement is deposited onto the wire mesh face, and, in turn, is pressed onto an endless felt cloth belt moving above the cylinder; the belt travels from cylinder to cylinder picking up a layer of slurry from each to give a lamination of several layers.
- When the moving belt has passed over all cylinders, the sheet clinging to it is partially dried by suction and then is pressed onto an accumulator drum. On this revolving drum, the sheet is further laminated up to desired thickness and then is cut off, after which it is conveyed under a series of gas burners which remove more water.
3. GAF recalls that Ruberoid packaged 8-S for Johns-Manville in 1948 or 1949.
4. 8-S, an asbestos waste product, was a gray sand.
5. Neither Ruberoid Corporation nor GAF Corporation had facilities or equipment designed for medical research and therefore conducted no tests or studies of the nature specified.
6. GAF Corporation sold Calsilite to the following entities in Florida as follows:

<u>COMPANY</u>	<u>JOBSITE</u>	<u>YEAR</u>
A.C. & S.	Merritt Island	1964
Adamo Insulation	Tampa	1965
Davidson Chemical	Ridgewood	1965
Ebasco Services	Pt. Everglades	1965
George L. Simonds	Tampa	1965
Foster Wheeler	Tollson	1965
A.C. & S.	Jacksonville Merritt Island	1965
Riley Stoker	East Tampa	1965
Bighan Insulating & Supply	Ft. Lauderdale	1965
Lakeview Siding	Ft. Lauderdale	1965
Coleman Insulation	Lake Worth	1965
U.S. Sugar Corp.	Canal Point	1965
National Cork	Pensacola	1965
Adamo Inc.	Occidental	1966

Adamo Insulation	Tampa Port St. Joe Crystal River	1966
Occidental Corp.	Occidental	1966
Hudson Pulp & Paper	Palatka	1966
Bigham Insulating & Supply	Ft. Lauderdale	1966
Lakeview Siding	Ft. Lauderdale	1966
Pratt & Whitney Aircraft	Ft. Lauderdale	1966
National Cork	Pensacola	1966
Bigham Insulating & Supply	Ft. Lauderdale	1969
Lakeview Siding	Ft. Lauderdale	1969
Adamo Insulation	Tampa	1970
Gulf & Western American Corp.	Tampa	1970
Western Electric	Florida City	1970
A.C. & S.	Jacksonville Savannah	1970
Tompkins & Beckwirth	Jacksonville	1970
Rec Off Direct Turn- over	Yukon	1970
Lakeview Siding	Ft. Lauderdale	1970
Florida Power Corp.	Red Level Junction	1970
A.C. & S.	Jacksonville Pensacola	1971
Bigham Insulating & Supply	Ft. Lauderdale	1971
Eagle-Picher Indus.	Cincinnati	1971
Babcock & Wilcox	Gainesville	1971
Great Barrier Insul.	Tallahassee	1971

7. In approximately 1965 Ruberoid began placing warning notices on the packaging of its industrial products which contained asbestos.

I have read the foregoing Answers to Interrogatories and do swear that they are true and correct to the best of my knowledge and belief.

Patricia Carbutt

STATE OF New York
COUNTY OF New York

Before me the undersigned authority personally appeared Patricia Carbutt who swears and deposes that he has read the Answers to Interrogatories and that same are true and correct to the best of his knowledge and belief.

Sworn to and subscribed before me this 7th day of April, 19 81.

Geraldine Ruth
NOTARY PUBLIC

My Commission Expires:

GERALDINE RUTH
Notary Public, State of New York
No. 31-3409815
Qualified in New York County
Commission Expires March 27, 1993

SEAL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Answers to Interrogatories was mailed this _____ day of _____, 19 _____ to:

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By: _____
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April 28, 1981

PLEASE REPLY TO:

Rodger Wilson, Esq.
Johns-Manville Corp.
Ken Caryl Ranch
Denver, Colorado 80217

RECEIVED

MAY 4 1981

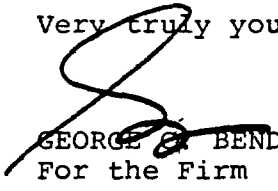
LEGAL DEPARTMENT

Re: Gordon v. Johns-Manville

Dear Rodger:

Enclosed is a copy of the Answers to Interrogatories which were filed by GAF Corporation in the above captioned matter.

Very truly yours,


GEORGE C. BENDER
For the Firm

GCB/dkt
Enclosure
cc: Lively Wilson, Esq.
Elizabeth Slack
Ronald J. Sheeran

*note
I
file
let
P. Ferris
review
before
filing*