

1953 Directory of Memberships and Representatives

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Academy of Political Science	E. & C. Div.	C. D. Ulmer	
Advertising Club of Baltimore	Metal Products	J. L. Tunstead	
Advisory Council on Federal Reports	Washington Off.	G. W. Naylor	
Aircraft Owners & Pilots Assn.	Metal Products	S. H. Fedan	
Air Pollution & Smoke Prevention Assn. of America	Metal Products	W. F. Perkins Edward Salner	
Akron Rubber Group	Chemical Division	J. W. Pool, Jr.	
Alabama Lumberman's Club	Wood Preserving	S. L. Taylor	
Alabama Road Builders Assn.	Tar Products	F. G. Owen, Sr. H. A. Van Orman	
Allegheny County Bar Assn.	Law Dept.	C. M. Crick J. M. Grimmins T. H. Hamilton B. A. Horn, Jr. E. S. Ruffin, Jr. Templeton Smith	
Allegheny Regional Advisory Board	Traf. & Trans.	J. F. Haley John B. Keeler	Members of the Exec. Committee
Allied Railway Supply Assn.	Metal Products	J. E. Onnen	
American Arbitration Assn.	Koppers General	V. H. Vlot	
American Assn. for the Advancement of Science	Tar Products E. & C. Div.	E. O. Rhodes C. D. Ulmer	
American Assn. of Textile Chemists and Colorists	Chemical Div.	J. F. Corwin	Indiv. M'brship.
American Bar Assn.	Research Dept. Law Dept.	Dr. Monacelli C. M. Crick J. M. Grimmins T. H. Hamilton B. A. Horn, Jr. E. S. Ruffin, Jr.	Also member of Tax Section. Also member of Anti-Trust Sect. Also member of Corp., Banking & Business Law Sec.

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Bureau of Shipping	E. & C. Div.	R. L. Cuthbert	Certified Marine Chemist.
American Ceramic Society	Research Dept.	C. R. Austin	
American Chemical Society	Chemical Div. E. & C. Div.	C. F. Winans A. J. Abrams F. A. Bendre J. L. Bradley C. W. Clarke R. L. Irvine R. E. Petty E. V. Schulte W. E. Simmat B. Smith B. F. Tattersson C. D. Ulmer	Indiv. M'brship.
	Gas & Coke Div.	H. J. Meredith	
	Metal Products	F. R. Winter	
	Research Dept.	Dr. D'Allelio Dr. Thiessen	Rubber Chemistry Division.
	Tar Products	E. C. Rhodes W. H. Carter R. C. Stromquist	Local & National National "
	Wood Pres. Div.	R. H. Bescher	
American Chemical Society, Div. of Gas & Fuel Chemistry.	Tar Products	E. O. Rhodes	
American Coke & Coal Chemicals Institute.	Chemical Div. E. & C. Div.	D. M. Rugg J. H. Taussig, Jr. C. D. Ulmer G. P. Wilson, Jr.	Indiv. M'brship.
	Gas & Coke Div. (Brooklyn)	H. F. Fisher	
	(Pittsburgh)	L. C. Biery M. T. Herreid J. E. Spears	
	(Minnesota)	A. W. Lundquist	
	(Seaboard)	H. R. Wesenberg K. R. Hare P. C. McConnaughey	Member of Domestic Coke Committee. Member, Joint Anthracite & Bituminous Coal & Coke Committee.
	Law Department	J. M. Spees	
	Sales Dept.	J. M. Crimmins	
	Tar Products	D. MacArthur H. B. Cummings T. H. Bartholomew J. D. Saylor	Indiv. M'brship.
	Traf. & Trans.	C. R. Willetts J. B. Keeler	Coal Chem. Comm. Traffic Committee

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Concrete Assn.	E. & C. Div.	R. A. Jewett	
American Economic Assn.	Sales Dept. E. & C. Div.	F. M. Garfield C. D. Ulmer	Indiv. M'brship.
American Electroplaters Society	Metal Products	R. E. Gunkle	
American Forest Products Industries	Wood Pres. Div.	R. M. Milley P. E. Olsson	
American Forestry Assn.	Wood Pres. Div.	R. M. Milley	
American Foundrymen's Society	Gas & Coke Div. (Minnesota)	A. W. Lundquist H. R. Wesenberg Frank Parsons, Jr., Committee, Twin City Chapter	
	(Seaboard)	M. L. Heath	
	(Pittsburgh)	J. E. Spears	
	Metal Products	F. A. Newhart R. Di Biagio E. T. Stump J. J. Bronza J. R. Redmond	Educational Comm.
	Production		
American Gas Association	Chemical Div. E. & C. Div.	D. M. Ragg W. M. Africa Joseph Becker R. Berg E. N. Button G. E. Hake S. H. Kimmel W. A. Leech H. V. Nelson E. Preston J. A. Slater J. H. Taussig, Jr. J. van Ackeren C. D. Ulmer	Indiv. M'brship.
	Gas & Coke Div. (Pittsburgh)	M. T. Herreid J. E. Spears M. W. Gaylord H. J. Meredith J. M. Spragg	
	(Seaboard)		
	Metal Products	G. C. Hoff J. L. Tunstoad	Chairman, Carboni- zation & Coke Comm. Builders sub-comm.
	Production Dept.	Fred Denig	
	Research Dept.	A. A. Powell	
	Sales Dept.	M. W. Greene	Indiv. M'brship.
	Tar Products	H. B. Cummings T. H. Bartholomew J. D. Saylor H. E. Crane J. E. B. Gibbons W. H. T. Thornhill G. E. Boyd	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Institute of Accountants	E. & C. Div.	H. A. Semler	
American Institute of Chemical Engineers	Chemical Div.	B. J. C. van der Hoeven, Indiv.	M'brship.
	E. & C. Div.	A. J. Abrams J. M. Burgrad C. W. Clarke C. W. Fisher E. J. Felt M. Josephans J. S. Joseph	Jr. Member Jr. Member, Treasurer, Pgh. Section.
		R. L. Irvine H. W. Maurice G. A. Onchundro E. Preston E. V. Schulte B. Smith, Jr.	National & Pgh. Section. Member
	Production Dept.	Richard S. Rhodes	Member and on National Program Committee.
	Research Dept.	Dr. D'Alelio	
	Tar Products	E. O. Rhodes	
American Institute of Electrical Engineers	Chemical Div.	A. A. Sellers	Indiv. M'brship.
	E. & C. Div.	G. T. Bruun J. B. Castellano, Student Mbr. H. H. Douglass Gordon Fox Daniel Hemmender, Asso. Mbr. J. L. Hewett E. H. Lehman, Asso. Mbr. Buel McNeil G. A. Mollo R. O. Parker, Asso. Mbr. G. F. Ross P. A. B. Sahn H. W. Seavel J. W. White A. J. Whitecomb	
American Institute of Management	Control Section	T. J. McGinnis	
	E. & C. Div.	R. L. Irvine	
	Gas & Coke Div.	J. E. Spears	
American Institute of Mechanical Engineers	E. & C. Div.	Owen Rice	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Institute of Mining & Metallurgical Engineers	E. & C. Div. Research Dept.	A. J. Abrams Gordon R. Baer R. A. Blackburn W. B. Clemmitt R. E. Nagel H. Naismith W. A. Leech Dr. Mathesius F. W. Rys Dr. A. R. Powell	
American Iron and Steel Institute	Chemical Div. E. & C. Div. Production Dept. Research Dept.	D. M. Rugg Joseph Becker R. Berg G. M. Carvlin L. A. Kraemer J. van Ackeren Fred Denig C. R. Austin	Indiv. M'brship.
American Leather Chemists' Assn.	Chemical Div. Research Dept.	J. F. Corwin Dr. Thiessen	Indiv. M'brship.
American Legion	Wood Pres. Div.	J. H. Bade, Finney R. M. Killey, Charleston	
American Management Association	Finance Dept. Insurance Section Industrial Rela. Sales Dept.	E. A. Berry H. H. Hook Gen. Somervell N. L. Scanlon A. C. Tolson V. H. Viot M. S. Griffith Cooke Bausman, Jr.	Finance Council Insurance Div.
American Marketing Association	Sales Dept.	B. J. Korb M. W. Greene F. M. Garfield R. E. Garvin T. C. Parker L. W. Adams	Director Chairman, Co. M'brship Comm. Indiv. M'brship " " " " " "
American Materials Handling Soc.	Metal Products	R. C. Motter E. E. Seibert	Pres. Balti. Chap. Meetings Comm.
American Mining Congress	Wood Pres. Div.	D. C. Smith	
American Ordnance Association	E. & C. Div. Gas & Coke Div. Koppers Gen. Metal Products Tar Products	R. Berg M. T. Herreid J. H. Redmond J. L. Tunstead F. C. Foy	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Patent Law Association	Research Dept.	Dr. W. J. Monacelli	
American Petroleum Institute	E. & C. Div.	G. M. Carvlin	
American Petroleum Institute	Tar Products	H. E. Crane	Member Advisory Council.
		J. E. B. Gibbons	
American Plant Food Council	Tar Products	J. H. Carpenter C. G. Franklin	
American Pulp & Paper Mill Superintendents Assn.	Metal Products	E. A. Salner A. Swanson J. L. Tunstead	
American Railway Bridge & Building Assn.	Wood Pres. Div.	R. H. Bescher	
American Railway Engineering Assn.	Tar Products	J. N. Roche E. O. Rhodes	
	Wood Pres. Div.	R. H. Bescher	
American Road Builders Assn.	Tar Products	F. C. Foy E. O. Rhodes M. D. Chamberlain P. F. Phelan E. F. Bennett	Chairman, Comm. on Soil Compaction.
		R. A. Taylor	Director, Chairman-Comm. on Tar Stabilized Roads.
American Society of Ceramics	E. & C. Div.	W. Mathesius, Jr.	
American Society of Civil Engrs.	E. & C. Div.	J. M. Durfee G. J. Gialdini J. R. Hess L. J. Johnson R. D. Loadman L. L. Murray T. M. Osborne	Jr. Member Jr. Member Jr. Member
	Frankl Foundation Company	W. P. Eckert Arthur J. Bulger	
American Society of Corporate Secretaries	Law Dept.	E. S. Ruffin, Jr., also member of Securities Committee. T. H. Hamilton (Alternate) Pgh.	
American Society of Engineering Education.	E. & C. Div.	R. A. Jewett	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Society of Testing Materials (continued)	E. & C. Div.	R. P. Dodds	
	Franki Foundation	R. A. Biggs	
	Metal Products	G. V. Middaugh	
		G. F. Hyde	
	Production Dept.	J. G. Bradshaw	
	Research Dept.	Dr. Thiassen	Comm. Member
	Tar Products	E. O. Rhodes	Committee D-4,
	Road and Paving Materials.		
		M. G. Sturrock	- Committee D-4,
	Road and Paving Materials.		Subcommittees of
	D-4; B-5 Softening Point, B-6		Extraction and
	Recovery of Constituents from Bituminous		
	Mixtures; B-7 Viscosity and Float Tests;		
	B-17 Emulsion Tests; B-19 Accelerated Tests		
	for Durability of Bituminous Materials; B-21		
	Solubility Tests; B-26 Effect of Water on		
	Bituminous Coated Aggregates; C-2 Tar Pro-		
	ducts; C-11 Road-Mix Bituminous Surfaces		
	and Bases; C-13 Bituminous Paving Plant		
	Operations Subcommittee of D-7, Wood		
	VI Timber Preservatives Subcommittee of E-1,		
	Methods of Testing 9 Rheological Properties.		
	Task Group on Methods and Apparatus for		
	Absolute Viscosity Measurements; D-16, In-		
	dustrial Aromatic Hydrocarbons Subcommittees		
	of D-16: A Monocyclic Aromatics		
	B Polycyclic Aromatics		
	C Phenolic Compounds		
	D Nitrogen Heterocyclics		
		W. F. Fair, Jr.	- Committee D-1,
	Paint, Varnish, Lacquer and Related Products		
	Subcommittees of D-1		
	III Bituminous Emulsions		
	XXIX Painting of Metals		
	Committee D-8, Bituminous Waterproofing and		
	Roofing Materials. Advisory Committee, Sub-		
	committees of D-8.		
	IV Membrane, Waterproofing and		
	Built-Up Roofing.		
	V Bituminous Outback Coatings		
	for Cold Applications (Chairman)		
	VIII Accelerated Tests on Roofing		
	Materials.		
	IX Bituminous Emulsions		
	XIII Stain Properties of Bituminous		
	Materials; Committee E-1 Methods of Testing		
	Subcommittees of E-1. 9 Rheological Proper-		
	ties- Chairman (Rep D-8) Task Group on Soft-		
	ening Point. Task Group on Methods and		
	Apparatus for Absolute Viscosity Measure-		
	ments		

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American Society of Testing Materials (continued)	Tar Products (continued)	E. F. Bennett	Committee D-18
	Soils for Engineering Purposes of D-18.		Subcommittee
		R-4	Chairman-Physical Properties of Soils.
		R-8	Special and Construction Control Tests Section B Subgrades for Highways and Airports.
		R-9	Dynamic Properties of Soil Group S-Specifications and Methods of Tests.
		P. F. Phelan	Committee D-18
			Soils for Engineering Purposes Subcommittee
		R-3	Physical Characteristics of Soil Section C. Moisture Content and Density.
		R-5	Structural Properties of Soil Section B Direct Shear
		R-8	Special and Construction Control Tests Section D Stabilization with admixtures Group S-Specifications and Methods of Tests.
	Wood Pres. Div.	R. H. Bescher	
American Society of Tool Engineers	Metal Products	B. Hamilton	
		E. L. Russell	Chairman Constitution and by-laws Committee.
	Production Dept.	J. H. Redmond	
American Society of Traffic and Transportation	Traf. & Trans.	J. F. Haley	
		J. B. Keeler	
		E. A. Gorges	
American Society of Training Directors	Tar Products	R. B. Weidlein	
	Indus. Relations	L. A. Allen	
		D. D. Hicks	Secretary
		J. R. Blair	
		E. J. Martin	
		R. F. Dean	
		S. Hobbs	
American Standards Association, Inc.	Koppers General	K. E. Miller	
	Gas & Coke	M. W. Gaylord	Co. membership
	Production Dept.	K. E. Miller	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
American-Turkish Society	Koppers-General	T. M. Osborne	
American Water Works Assn.	Tar Products	H. E. Giese G. E. Boyd S. J. Kays M. G. Sturrock	Steel Water Pipe Manufacturers Technical Advisory Committee.
American Welding Society	E. & C. Div. Metal Products	J. L. Lynds J. H. Burnley F. Scharf E. Wirth	
American Wood Preservers Assn.	Research Dept. Tar Products	Dr. Goldstein F. C. Foy J. C. Macon D. S. Snow M. G. Sturrock M. D. Gill J. N. Fencil D. D. Hamilton S. J. Katz E. O. Rhodes J. T. Tierney F. G. Owen J. N. Roche, Special Committee on Fundamental Research on Hydro Carbon Oils as Wood Preservatives. Member of the Board of the Service Bureau.	
	Wood Pres. Div.	E. J. McGehee, Chairman, Comm. of Specifications.	
	(Texarkana)	M. F. Gravey Comm. # 12. C. F. Seyer	
	(Kansas City)	R. H. Devine	
	(Philadelphia)	C. C. Calvin	
	(Newport)	M. A. Hamrick	
	(Houston)	J. W. Sullivan	
	(Russell)	R. A. Piepho	
	(Finney)	J. H. Bade	
	(Baltimore)	M. R. Clifton	
	(New York)	D. F. Taylerson	
	(Pittsburgh)	D. C. Smith	
	(Charleston)	R. M. Killey	
	(Orrville)	R. H. Boscher	
	(Montgomery)	S. L. Taylor E. J. McGehee	
A.W.P.A. Expense - Convention			
Anthracite Club of Suburban Essex	Gas & Coke	A. J. Dressel F. L. Demmert	
Area Contractors Assn, Port Arthur, Texas.	E. & C. Div.	W. S. Scherffius	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Armed Forces Chemical Association	Chemical Div.	T. C. Keeling, Jr.,	Indiv. M'brship
Ashland Toastmasters Club	Wood Pres. Div.	R. A. Piepho	
Asphalt Roofing Industry Bureau	Tar Products	D. D. Hamilton, Comm. J. A. Seifert	Built-up Roofing OPS Advisory Comm.
Associated Industries of Alabama	Tar Products	F. G. Owen, Sr.	
Associated Industries of Missouri	Tar Products	T. O. Thiebes	
Assn. of Commerce, Superior	Wood Pres. Div.	S. G. McGlasson	
Assn. of General Contractors of America	Tar Products	H. E. Crane	
Assn. of Highway Officials of North Atlantic States	Tar Products	No one person designated	
Assn. of Iron and Steel Engineers	E. & C. Div.	G. T. Bruun F. W. Barrett D. Carle O. C. Callow W. B. Ferguson A. B. Fisher, Jr. Gordon Fox L. J. Hough Daniel Lillemoen Dr. Mathesius R. K. Matthews J. F. Mieler J. M. Orris W. C. Schofield D. C. Skinner J. A. Slater L. P. Staubitz A. J. Whitecomb, Dist. Sec.	
Assn. of Iron and Steel Engineers	Metal Products	H. C. Monroe	
Assn. of National Advertisers, Inc.	Public Relations	Ralph Winslow	
Baltimore Assn. of Commerce	Metal Products	W. F. Perkins	Director
Baltimore Jr. Assn. of Commerce	Metal Products	R. W. Dorsey	Public Relations Committee.
Bergen County Fuel Merchants Assn.	Gas & Coke Div.	T. J. Leather T. Dodds	
Bibliographical Society of America	E. & C. Div.	C. D. Ulmer	
Blacktop Roads Assn.	Tar Products	H. G. Nicholson	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Blast Furnace and Coke Oven Assn. (Chicago district)	E. & C. Div.	Gordon Baer Joseph Becker G. M. Carvlin C. W. Dillman Gordon Fox A. B. Fisher, Jr. H. W. Fricke S. H. Kimmel L. A. Kraemer R. K. Matthews H. W. Maurice Dr. Mathesius W. W. McWhorter E. Preston Owen Rice R. J. Sprott R. B. Stannard R. W. Vollmer G. P. Wilson, Jr. F. F. Wise	
	Metal Products Gas & Coke Div.	E. V. Harlow M. T. Herreid M. W. Gaylord	
Boston Better Business Bureau	Tar Products	M. D. Gill	
British Assn. for the Advancement of Science	E. & C. Div.	C. D. Ulmer	
British Institute of Fuel, London	E. & C. Div.	R. Berg	
British Institute of Metals	Metal Products	J. J. Brenza	
British Wood Preservers Assn.	Tar Products	F. C. Foy R. R. Holmes E. O. Rhodes	
Building Owners & Managers Assn. of Pittsburgh	Finance Dept.	J. B. Sellers J. L. Ralston H. A. Biber	Rental Committee
Business & Professional Lecturer Group	Wood Pres. Div.	J. H. Bade	
Canadian Gas Association	Tar Products E. & C. Division	W. F. Croft J. H. Taussig, Jr., Delegate	
Canadian Manufacturing Assn.	Tar Products	W. F. Croft R. A. Munson	
Canadian Water Works Assn.	Tar Products	W. F. Croft	
Carolina's Roofing & Sheet Metal Salesmen's Assn.	Tar Products	F. G. Owen, Sr. W. R. Hawkins	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Central N. J. Fuel Exchange	Gas & Coke	A. J. Dressel	
Chamber of Commerce - Alexandria	Wood Pres. Div.	E. L. O'Neill	
Bergen County	Gas & Coke	T. J. Leather	
Birmingham	Tar Products	F. G. Owen, Sr.	
Boston	Tar Products	M. D. Gill	
Brooklyn	Gas & Coke	H. F. Fisher L. C. Biery W. J. Brandenburg	
Buffalo	Tar Products	J. N. Curry	
Butler	Chemical Div.	C. D. Burton	
California	Tar Products	G. E. Traut	
Berkeley Hts. (Chemaco Plant)	Chem. Div.	H. M. Hartong	
Charleston	Wood Pres. Div.	R. M. Killey	
Chicago	Tar Products	W. E. Cunningham	
Clifton	Gas & Coke	T. J. Leather	V.P. Indus.Div.
Denver	Wood Pres. Div.	R. C. Johnson	
Elizabeth	Gas & Coke	A. J. Dressel	
Everett	Tar Products	H. W. Thistlethwaite	
Follansbee	Tar Products	F. M. Smith	
Fontana	Tar Products	G. E. Traut	
Hamilton	Tar Products	J. T. Smith	
Houston	Tar Products Wood Pres. Div.	R. M. Smith J. W. Sullivan	
Illinois	Wood Pres. Div.	R. P. Jackson	
Jersey City	Gas & Coke	K. R. Hare H. L. Francis	Mbr., Trans. Comm.
Kearny	Gas & Coke Tar Products	P. C. McConnaughey, Vice Pres. J. V. Ferris W. H. Carter	
Monaca	Chemical Div.	B. R. Sarchet	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Chambers of Commerce -			
Nashua	Wood Pres. Div.	C. F. Affeldt	
Newark	Gas & Coke	K. R. Hare H. L. Francis,	Chairman, Rivers & Harbors Comm. Mbr. Trans. Comm.
Newport	Wood Pres. Div.	M. A. Hamrick	
New Jersey	Gas & Coke	K. R. Hare H. L. Francis,	Mbr. Indus. Traff. Committee
		H. J. Meredith,	Mbr. Air Pollu- tion Committee
	Tar Products	J. V. Ferris,	Seaboard
		W. B. Jackson,	Garwood
		W. H. Carter,	Meadows
No. Little Rock	Wood Pres. Div.	P. I. Gibson	
Oil City	Chemical Div.	C. G. Youngquist	
Orrville	Wood Pres. Div.	R. H. Bescher	
Pa. State	Koppers General	Cooke Bausman	
	Tar Products	F. C. Foy	Member, Comm. on Nat. Legislation
Pa. Jr. Chamber	Koppers Gen.	R. A. Harper	
Pgh. Jr. Chamber	Koppers Gen.	R. A. Harper	
	Wood Pres. Div.	D. C. Smith	
	Sales Dept.	J. R. Rumisek	Indiv. M'brship
	Finance Dept.	F. W. Finney	
Pittsburgh	Tar Products	F. C. Foy	V.P. & Director Vice Chrman, National Affairs Comm. Member, Salary Comm., Member, Ed. Comm.
		H. B. Cummings	
	Traffic & Trans.	J. B. Keeler	Freight Traffic Committee
		J. F. Haley	
		E. A. Gorges	
	E. & C. Div.	R. Berg G. M. Carvlin	
	Finance Dept.	J. B. Sellers J. L. Ralston	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Chambers of Commerce, Pittsburgh	Production	J. H. Redmond	Vice Chrman., Plant & Internal Security Comm.
Port Arthur	Tar Products	R. A. Munson	
Providence	Tar Products	M. D. Gill	
Queens	- Gas & Coke	H. F. Fisher	
Richmond	Wood Pres. Div.	D. L. Skelkey	
Salida	Wood Pres. Div.	R. P. Williams	
Steubenville	Tar Products	F. M. Smith	
St. Louis	Tar Products	J. T. Tierney	
Texarkana	Wood Pres. Div.	C. F. Seyer	
Tulsa	Tar Products	R. C. Kenan	
Union County, N. J.	Tar Products	W. B. Jackson	
United States	Koppers General	F. C. Foy	
	Production	J. H. Redmond	Member Advisory Comm. on Maintenance of Post- Attack Produc.
	Tar Products	F. C. Foy	Member, Comm., Gov. Expenditures
	Washington Off.	G. W. Naylor	
Utica	Tar Products	W. R. Jones	
Warren	Tar Products	J. Little	
Youngstown	Tar Products	M. D. James	
Charleston Industrial Supervisor	Wood Pres. Div.	R. M. Killey	
Chemical Club of New England	Chemical Div.	J. W. LaBelle	Indiv. M'brship
Chemical Market Research Assn.	Chemical Div. Sales Dept.	C. B. Wagner B. J. Korb T. C. Parker L. W. Adams	Indiv. M'brship " " " " " "
Chemical Specialties Manufacturers Assn., Inc.	Tar Products	J. H. Carpenter, M. W. St. John	Tar Acid Comm. on Disinfectants

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Chemists Club of New York	Metal Products Tar Products	G. C. Pfaff E. O. Rhodes	
Chicago Assn. of Commerce and Industry	Tar Products	J. T. Tierney, Jr.	
Chicago Engineers Club	E. & C. Div.	Gordon Fox	
Chicago Railroad Diesel Club	Metal Products	J. E. Onnen	
Christiana Hundred	Wood Pres. Div.	M. A. Hamrick	
Cicero Manufacturing Assn.	Tar Products	W. E. Cunningham	
Cincinnati Lumbermans' Group	Wood Pres. Div.	J. H. Bade	
Civic Club of Allegheny County	Finance Dept.	J. B. Sellers	
Civic Engineers of Pittsburgh	E. & C. Div.	R. F. Ross	
Clapp Laboratories	Wood Pres. Div.	W. P. Arnold	
Cleveland Engineering Society	Metal Products	R. R. Day	
Coal Consumers Protective Assn., Inc.	Gas & Coke Div.	H. F. Fisher,	Sec. of Coal Con- sumers.
Coke Oven Ammonia Research Bureau, Inc.	Sales Dept. Gas & Coke	Cooke Bausman, Jr., Board of Dir. M. T. Herreid J. E. Spears	
Coke Oven Managers Assn.-England	E. & C. Div.	C. D. Ulmer	
Colorado Engineering Society	Wood Pres. Div.	R. C. Johnson	
Colorado Society of C.P.A.'s	E. & C. Div.	H. A. Semler	
Commerce for Transportation	T. & T. Dept.	J. F. Haley	Consultant to the Under-Sec.
Commercial Chemical Development Assn.,	Chem. Div. Research	C. F. Winans Dr. Thiessen	Indiv. M'brship
Commission of Governmental Efficiency and Economy	Metal Products	W. F. Perkins	
Committee for Economical Development,	Sales Dept.	Cooke Bausman, Jr.	
Committee for Major Group 28 - Review of Standard Industrial Classification Manual	Washington Off.	G. W. Naylor	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Comptrollers Institute of America	Metal Products Finance Dept. Treas. & Acct.	J. E. Tellman E. A. Berry J. M. Veeder E. B. Shuck R. E. Gray	Publicity Comm. Program Comm. Member of special Research Comm. on Centralization vs. Decentralization of Controller functions.
Connecticut Highway Assn.	Tar Products	M. D. Gill	
Corporation Aircraft Owners' Assn.	T & T Dept.	B. Q. Van Cott	
Country Club of Charleston	Wood Pres. Div.	R. M. Killey	
Dept. of the Army	T. & T. Dept.	J. B. Keeler	Consultant, Spec. Assignment
Diesel Engine Manufacturers Assn.	Metal Products	J. A. Worthington	
East Providence Better Business Assn.,	Tar Products	M. D. Gill	
Eastern Industrial Traffic League	Gas and Coke	H. L. Francis	Vice Pres.
Eastern States Blast Furnace and Coke Oven Assn.	Chemical Div. E. & C. Div.	D. M. Rugg Gordon Baer Joseph Becker R. Berg R. A. Blackburn J. D. Bradford. G. M. Carvlin O. H. Chambers H. A. Denny C. W. Dillman T. A. Donehoo A. B. Fisher, Jr. H. W. Fricke J. W. Greene H. A. Grosick J. A. Hartzell E. J. Helm O. L. Henry J. H. Kromer S. H. Kimmel L. A. Kraemer W. A. Leech, Jr. H. B. Lose R. K. Matthews H. W. Maurice D. J. McFarlin H. V. Nelson E. Preston	Indiv. M'brship Member, Board of Directors

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Eastern States Blast Furnace and Coke Oven Assn.(continued)	E. & C. Div.	Owen Rice R. F. Ross M. F. Scherr W. S. Scherffius E. V. Schulte F. M. Schweinberg R. J. Sprott G. M. Sturgeon C. K. Waibel G. P. Wilson, Jr. C. D. Ulmer	
	Gas & Coke Div.	M. W. Gaylord J. E. Spears	
	Metal Products	E. V. Harlow	
Elks Club	Wood Pres. Div.	R. M. Killey	
Engineers Civic Club of Pittsburgh	Metal Products	E. F. Cary	
Engineers Clubs	Wood Pres. Div.		
Baltimore Finney		M. R. Clifton J. H. Bade	
Engineers Society of Western Pa.	E. & C. Div.	R. A. Blackburn R. P. Dodds, Board of Dir. Mech. M. Josenhans B. L. Keim W. A. Leech, Jr. G. F. Ross R. F. Ross R. W. Vollmer G. P. Wilson, Jr.	
	Metal Products	E. F. Cary	
Exchange Club of Charleston	Wood Pres. Div.	R. M. Killey	
Exchange Club of Orrville	Wood Pres. Div.	R. H. Bescher	
Exchange Club of St. Paul	Tar Products	F. S. Franke	
Executives Club of Charleston	Wood Pres. Div.	R. M. Killey	
Faraday Society	Research Dept.	Dr. A. R. Powell	
Farm Fencing Assn.	Wood Pres. Div.	R. H. Devine	
Federation of Sewage Works Assn.	Tar Products	M. K. Cox	
Foreman's Club of New Haven	Tar Products	C. L. Farnsworth	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Forest Products Research Society	Chemical Div.	J. F. Corwin (Research Fund)	
	Research Dept.	Dr. I. Goldstein Dr. G. Thiessen	
	Tar Products	J. N. Roche	
	Wood Pres. Div.	R. H. Bescher	
40 and 8 Club	Wood Pres. Div.	J. H. Bade	
Freight Car Efficiency Committee	Wood Pres. Div.	R. C. Johnson	
Fuel Merchants Association of N.J.	Gas & Coke Div.	P. C. McConnaughey, T. J. Leather A. J. Dressel	Member of Finance Comm. Member, Legislative Comm.
Gas Appliance Manufacturers Assn.	E. & C. Div. Gas & Coke Div.	J. H. Taussig, M. T. Herreid	Delegate
Georgia Highway Contractors Assn.	Tar Products	F. G. Owen, Sr. H. A. Van Orman	
Harvard Engineering Society	Frankl Foundation Company	A. J. Bulger R. A. Biggs	
Highway Research Board, National Research Council	Tar Products	A. R. Taylor P. F. Phelan E. F. Bennett, Dept. of Soils Investigation. Chairman - Granular Road Bases and Sub-bases. Chairman-Frost Heave & Frost Action in Soils Surveying and Classifying Soils in place for Engineering Purposes Committee. E. O. Rhodes, Division of Engineering and Industrial Research E. W. McGovern	
History of Science Society	E. & C. Division	A. J. Abrams	
Hospital Board	Wood Pres. Div.	R. H. Bescher	
Houston Retail Lumber Dealers Assn.	Wood Pres. Div.	J. W. Sullivan	
Hudson Coal Credit Assn.	Gas and Coke Div.,	A. J. Dressel, Trustee W. W. Oeters	
Illinois Independent Telephone Assn.	Wood Pres. Div.	G. C. Rosenquist	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Illinois Manufacturers Assn.	Wood Pres. Div.	R. P. Jackson	
Improvement of the Poor	Finance Dept.	J. B. Sellers	Director
Indiana Independent Telephone Assn.	Wood Preserving	G. C. Rosenquist	
Industrial & Manufacturing Assn.	Tar Products	F. P. Schlax, Carrollville F. M. Smith, Follansbee W. R. Jones, Utica	
Industrial Assn. of the Mohawk Valley	Tar Products	W. R. Jones	
Industrial Club of Baltimore	Metal Products	M. S. Griffith	
Industrial Commission of Colorado	Wood Pres. Div.	R. C. Johnson	
Industrial Hygiene Foundation of America, Inc.	Indus. Relations	V. H. Viot A. K. Black III H. F. Ebken M. S. Griffith W. S. Scherffius N. L. Scanlon O. E. Stewart J. S. Magee	
Industrial Management Club	Wood Pres. Div.	C. F. Affeldt, Nashua R. M. Killey, Charleston	
Industrial Research Institute	Research Dept.	Dr. A. R. Powell, Committee for Legislation Information. Dr. G. F. D'Alelio	
Industrial Safety Alumni	Finance Dept.	H. A. Biber, Vice President	
I.C.C. Fractitioners Assn.	T. & T. Dept.	J. B. Keeler, Comm. on Legislation. R. E. Spatz	
Industrial Relations Assn. of Chicago	E. & C. Div.	R. H. Jackson J. B. Christerson	
Industrial Smoke Abatement Assn.	Gas & Coke	J. M. Spees W. P. Dittmar	
Industrial Traffic Managers Assn.	Metal Products	L. J. Canter H. V. Kraft	
Institute of Aeronautical Sciences	Metal Products	S. H. Fedan	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Instrument Society of America	E. & C. Div.	H. J. Fox, Exec. Chairman C. R. Williamson H. P. Newhouse G. E. Faudin F. Revell	
Insulation Society of Pittsburgh	E. & C. Div.	R. P. Dodds, Board of Directors A. J. Pepper, President	
Insurance Buyers of Pittsburgh	Finance Dept.	H. H. Hook, Ex-officio member of Board of Directors as past-pres. T.M.T. McKennan, Director	
Kentucky Assn. of Highway Contractors	Tar Products	D. D. Hamilton F. B. Long J. O. Power	
Kiwanis Club of Brooklyn	Gas & Coke	H. F. Fisher	
Lake County Contractors Assn.	E. & C. Div.	F. F. Wise	
Lions Club	Wood Pres. Div.	M. A. Hamrick R. R. Keister R. M. Killey	
Long Island Coal Merchants Assn.	Gas & Coke Div.	H. F. Fisher J. F. Graham	
Macadam Pavement, Inc.	Tar Products	D. D. Hamilton F. B. Long A. R. Taylor, Technical Comm. R. G. Falmer	
Maines Good Roads Assn.	Tar Products	M. D. Gill P. E. Bennett	
Maine Water Utilities Assn.	Tar Products	E. J. Titworth	
Manufacturers Assn. of Canada	Tar Products	W. F. Croft R. A. Munson	
Manufacturing Chemists' Assn.	Chemical Div.	D. M. Rugg, Member of Board of Directors, Plastics Comm., Public Relations Comm. B.J.C. van der Hoeven serves as alternate for Mr. Rugg	
	Tar Products	F. C. Foy R. R. Holmes	
	T. & T. Dept.	J. B. Keeler, Chrman. Traffic Comm. J. F. Haley, Safety Committee E. A. Gorges, Plastics Materials Committee T. P. Reynolds, Tank Car sub- Committee.	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Manufacturers Club of West Hudson	Gas & Coke Div.	K. R. Hare P. C. McConnaughey	
Maryland Industrial Marketers	Metal Products	R. W. Dorsey	
Maryland Society of Training Directors	Metal Products	J. M. Bell, Jr.	Treasurer
Massachusetts Selectmen's Assn.	Tar Products	M. D. Gill G. W. Dean	
Michigan Independent Telephone Assn.	Wood Pres. Div.	N. P. Matro	
Middle Atlantic Conference of Bldg. Owners and Managers	Finance Dept.	J. L. Ralston	Director
Mississippi Economic Council	Wood Pres. Div.	D. L. Wagner	
MCA Research Fund for Physical Properties of Plastics	Chemical Div.	W. J. Fitzgerald	
Montgomery Traffic & Transportation Club	Wood Pres. Div.	S. L. Taylor	
National Assn. of Corrosion Engrs.	Tar Products	W. F. Fair, Chairman, N.Y. Section; Chairman, Nominating Committee M. G. Sturrock R. C. Stromquist E. O. Rhodes J. G. Brich H. E. Crane	
National Association of Cost Accountants	Chemical Div. E. & C. Div. Tar Products Finance Dept. Metal Products	R. J. Hein C. E. Lindberg H. A. Semler J. D. May F. R. Stoveken C. J. Stewart J. A. Stemple	
National Association of Credit Men	Finance Dept.	W. G. Hunt	
National Assn. of Foremen	Wood Pres. Div.	D. C. Smith	
National Association of Manufacturers	Sales Dept. Indus. Relations Tar Products Koppers-General	Cooke Bausman, Jr. V. H. Viot, Member of Industrial Relations Committee F. C. Foy, Director-Chairman, Distribution Committee F. C. Foy Cooke Bausman	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position Representative In Organization</u>
National Assn. of Purchasing Agents	Procurement Dept.	R.D. King, Pittsburgh P. D. Snollar, Pittsburgh A. E. Jones, Chicago	
National Constructors Assn.	E. & C. Div.	W. S. Scherffius, Labor Comm. F. R. Griffin R. E. Atkinson, Alternate Mbr.	& Chairman, Great Lakes Regional Committee
National Council of Private Motor Truck Owners	T. & T. Dept.	J. F. Haley, M'brship Committee	
National Defense Transportation Assn.	T. & T. Dept.	J. B. Keeler, Life Member J. F. Haley, Pres., Pgh. Chap. E. A. Gorges	& Regional Vice Pres. of National Chapter.
National Farm Chemurgic Council	Research Dept.	Dr. D'Alelio	
National Fertilizer Assn.	Tar Products	J. H. Carpenter C. G. Franklin	
National Fire Protection Assn.	Chemical Div. Finance Dept.	E. J. Dean H. H. Hook, Member of Industrial Committee	
	Koppers-General Gas & Coke Production Dept. Wood Pres. Div.	H. H. Hook I. Trimmer A. N. Harrison R. H. Bescher	
National Foreman's Institute	Gas & Coke Div.	J. E. Spears	
National Freight Traffic Assn.	T. & T. Dept.	J. B. Keeler, Exec. Comm. J. F. Haley E. A. Gorges	
National Hardwood Lumbermans' Assn.	Wood Pres. Div.	M. F. Cravey	
National Industrial Advertisers Association (Pgh. Chapter)	Public Relations	R. B. Johnston	
National Industrial Conference Board	Gas & Coke Div. Finance Dept. Sales Dept.	M. T. Herreid E. A. Berry, Council of Financial Executives. B. J. Korb	Advisory Council of Marketing Research Directors.
	Koppers-General	Gen. Somervell Cooke Bausman	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position Representative In Organization</u>
National Industrial Traffic League	Metal Products T. & T. Dept.	J. J. Canter J. B. Keeler, J. F. Haley, E. A. Gorges	Mr. Board of Directors. Chairman, Ex Parte 104, Part 2 Comm. Special Comm. on Transportation, Outlook & Policy. Member of Special Comm. on Ex Parte 175. Chairman: Area Membership Comm. Rate Construction & Tariffs Comm. Admin. Comm. of Railroads and Cooperating Comm. of National Industrial Traffic League for Railroads' Tariff Research group.
National Security Industrial Association	Production Koppers-General	J. H. Redmond J. H. Redmond	
National Office Management Assn.	Finance Dept.	E. B. Shuck R. E. Gray,	Advisory Committee and Nominating Comm.
National Rifle Assn.	E. & C. Div.	P. G. Shanor	
<u>Safety Councils</u> Baltimore	Metal Products	W. F. Perkins M. S. Griffith, Jr.,	Industrial Committee
Buffalo	Tar Products	J. N. Curry	
Chicago	Tar Products	W. E. Cunningham	
Delaware	Wood Pres. Div.	M. A. Hamrick	
Garwood	Tar Products	W. B. Jackson	
Hamilton	Tar Products	J. T. Smith	
Illinois Ave., Chicago	Tar Products	L. Cherrone	
New Jersey State	Gas & Coke Div.	K. R. Hare F. C. McConaughay	
National Safety Council	Koppers-General	A. N. Harrison	
	Tar Products	R. C. Bauer	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
National Safety Council (continued)	Gas & Coke Div.	M. W. Gaylord L. C. Biery F. A. Buczkowski	
	E. & C. Div.	H. B. Wallace	
	Chemical Div.	E. J. Dean	
	Wood Pres. Div.	D. C. Smith	
	Production Dept.	A. N. Harrison	
Western Pa. Safety Council	Wood Pres. Div.	D. C. Smith	
	Chemical Div.	E. J. Dean	
	Production Dept.	J. H. Redmond	Director
Safety Council, Youngstown	Tar Products	M. D. James	
National Sales Executives, Inc.	Sales Dept.	Cooke Bausman, Jr.	
National Society of Professional Engineers	E. & C. Div.	W. S. Scherffius. P. G. Shanor R. B. Stannard	
	Franki Foundation,	R. A. Biggs	
National Society of Sales Training Executives	Sales Dept.	Robert Copel	
Natural Gasoline Supplymen's Assn.	Tar Products	R. C. Keenan	
New England Council	Tar Products	M. D. Gill	
	Wood Pres. Div.	C. F. Affeldt	
New England Gas Assn.	Metal Products	G. C. Pfaff	
	Tar Products	H. B. Cummings E. J. Titsworth	
New England Paint & Varnish	Chemical Div.	J. W. LaBelle	
New England Railroad Club	Metal Products	C. Kessler	
New England Road Builders Assn.	Tar Products	M. D. Gill	
New England Roofing Contractors Assn.	Tar Products	M. D. Gill G. H. Persch	
New England Water Works Assn.	Tar Products	E. J. Titsworth	
New Hampshire Federation of Taxpayers	Wood Pres. Div.	C. F. Affeldt	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
New Hampshire Good Roads	Tar Products	M. D. Gill T. A. Mulvanity	
New Hampshire Mfrs. Assn.	Wood Pres. Div.	C. F. Affeldt	
New Jersey Coal Dealers Association	Gas & Coke Div.	A. J. Dressel F. L. Demmert	
New Jersey Gas Association	Metal Products	G. C. Pfaff	
New Jersey Industrial Traffic League	Gas and Coke Div.	H. L. Francis	
New Jersey Motor Truck Association	Gas and Coke Div.	H. L. Francis	
New Jersey Self-Insurers Association, Finance Dept.		H. H. Hook	
New York Good Roads	Tar Products	J. N. Fencil E. F. Crosetto	
New York Railroad Club	Metal Products	R. J. Green	
New York State Bituminous Concrete Association	Tar Products	J. N. Fencil E. F. Crosetto	
New York Fuel Merchants Assn., Inc.	Gas and Coke Div.	H. F. Fisher	
New York State Highway Superintendents Assn.	Wood Pres. Div.	D. F. Taylerson	
New York State Independent Telephone Assn.	Wood Pres. Div.	D. F. Taylerson	
New York State Sewage Assn.	Tar Products Research Dept.	G. E. Boyd Dr. Powell	
New York State Telephone Assn.	Wood Pres. Div.	D. C. Smith	
New York State Town Superintendents Assn.	Tar Products	J. N. Fencil E. F. Crosetto	
Northeastern Wood Utilization Council, Research Dept.,		Dr. D'Alelio	
North Jersey Coal Dealers Assn.	Gas and Coke Div.	T. J. Leather	
Northwest Good Roads Assn.	Tar Products	J. T. Tierney H. G. Nicholson	
Ohio Florists' Assn.	Wood Pres. Div.	R. H. Bescher	
Ohio Forestry Association	Wood Pres. Div.	R. H. Bescher	
Ohio Independent Telephone Assn.	Wood Pres. Div.	D. C. Smith	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Ohio Manufacturers Assn. (Warren)	Tar Products Koppers-General	J. Little J. C. Macon, Jr. D. Grymes and J. Irvine	
Organized Business (Charleston)	Wood Pres. Div.	R. M. Killey	
Pacific Coast Gas Association	Research Dept. Tar Products	Dr. Powell S. J. Katz	
Paterson Fuel Dealers Assn.	Gas and Coke	T. J. Leather R. Williamson	
Pennsylvania Bar Association	Law Dept.	C. M. Crick, Also member of Tax Section E. S. Ruffin, Jr. Templeton Smith	
Pennsylvania Constructors Assn.	Tar Products	F. B. Long F. V. Oler	
Pennsylvania Counties Supervision and Auditors Association	Tar Products	D. D. Hamilton F. B. Long F. V. Oler J. H. Coulson G. W. Sanner	
Pennsylvania Economy League	Koppers-General	C. M. Crick	
Pennsylvania Gas Association	E. & C. Div.	J. H. Taussig, Jr., Delegate	
Pennsylvania Self-Insurers Assn.	Finance Dept.	H. H. Hook	
Pennsylvania Society of Professional Engineers	E. & C. Div.	R. A. Blackburn E. J. Helm W. M. Africa G. F. Ross, Membership Committee	
Personnel Association	Metal Products	M. S. Griffith	
Petroleum Electric Supply Assn.	Wood Pres. Div.	J. W. Sullivan	
Petrolia Volunteer Firemen's Assn.	Chemical Div.	D. Stroup, Indiv. M'brship	
Pipeline Contractors Assn.	Tar Products	H. E. Crane	
Pittsburgh Advertising Club	Public Relations	Ralph Winslow	
Pittsburgh Builders Exchange	Tar Products	J. A. Seifert	
Pittsburgh Chemists Club	E. & C. Div.	A. J. Abrams	
Pittsburgh Civic Business Council	Koppers-General	F. C. Foy	
Pittsburgh Ordnance Society	E. & C. Division	G. M. Carvlin	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Pittsburgh Paint and Varnish Production Club	Chemical Div. Research Dept.	E. E. Kimmel Dr. Thiessen	
Pittsburgh Personnel Association	E. & C. Div.	R. E. Atkinson,	Member Wage and Salary Adm. Com
	Industrial Relations	Van H. Viot L. A. Allen,	Member of Steering Committee-Research
		R. E. Brick B. R. Sheddan H. P. Clifton J. S. Magee R. R. Montgomery,	Vice Chairman Wage & Salary Com
		G. W. Colburn D. J. Newman G. M. Carvlin	
Pittsburgh Regional Planning Association	Koppers-General		
Plastic Engineer's Assn. (N. Y.)	Chemical Div.	D. B. Hunter	
Plastic Material Credit Assn.	Finance Dept.	W. G. Hunt H. E. Crawford A. G. Wilson	
Practical Refrigeration Engineering	Metal Products	J. E. Onnen	
Professional Engineers License	Metal Products	G. C. Pfaff	
Professional Engineers Society	Frankl Foundation,	A. J. Bulger R. A. Biggs	
	E. & C. Division	A. B. Fisher, Jr. F. M. Schweinberg	
Propeller Club	Wood Pres. Div.	R. M. Killey	
Public Relations Society of America	Public Relations	Ralph Winslow	
Purchasing Agents Ass'n. of Baltimore	Metal Products	J. M. Kalista,	Director
Purchasing Agents Assn. of Chicago	E. & C. Division	A. E. Jones	
Purchasing Agents Assn. of N. Y.	Gas and Coke Div.	C. E. Marquardt	
Railway Business Association	Tar Products	R. R. Holmes F. C. Foy	
	Wood Pres. Div.	W. P. Arnold	
Railway Supply Manufacturers Assn.	Wood Pres. Div.	R. P. Jackson	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Railway Tie Association	Tar Products	J. N. Roche,	Committee on checking and splitting of cross ties. Chairman, sub-comm. on coatings for ties
	Wood Pres. Div.	E. J. McGehee W. D. Jetton R. H. Beschert	
The Refractories Institute	Research Dept.	C. R. Austin	
<u>Registered Professional Engineers</u>			
Georgia	E. & C. Div.	W. S. Scherffius	
Illinois	E. & C. Div.	P. E. Lundquist	
Indiana	E. & C. Div.	R. Berg R. A. Blackburn	
New Jersey	E. & C. Div.	R. Berg	
New York	E. & C. Div.	R. Berg	
Ohio	E. & C. Div.	R. Berg R. A. Blackburn C. F. Schuman L. Silverblatt	
Pennsylvania	E. & C. Div.	R. A. Blackburn H. A. Denny, Civil E. J. Helm T. M. Osborne	
Texas	E. & C. Div.	A. H. Stube	
West Virginia	E. & C. Div.	R. A. Blackburn	
Rhode Island Highway Association	Tar Products	M. D. Gill	
Rhode Island Truck Owner's Assn.	Tar Products	M. D. Gill A. L. Nickerson	
Rifle Club	Wood Pres. Div.	R. M. Killey	
<u>Rotary Clubs</u>			
Boston	Tar Products	M. D. Gill	
Chemaco Plant	Chemical Div.	H. M. Hartong	
Charleston	Wood Pres. Div.	R. M. Killey	
Chicago	Tar Products	W. E. Cunningham	
Everett	Tar Products	H. W. Thistlethwaite	
Fontana	Tar Products	G. E. Traut	
Grenada	Wood Pres. Div.	D. L. Wagner	
Nashua	Wood Pres. Div.	C. F. Affeldt	
North Little Rock	Wood Pres. Div.	P. I. Gibson	
Oil City	Chemical Div.	C. G. Youngquist, Serves on Program Comm.	
Orrville	Wood Pres. Div.	R. H. Beschert	
Providence	Tar Products	J. H. McClurg	
Russell	Wood Pres. Div.	L. A. Piepho	
Superior	Wood Pres. Div.	S. G. McGlasson	
Texarkana	Wood Pres. Div.	C. F. Seyer	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Safety Engineers Club	Metal Products Tar Products	N. D. Tucker, R. C. Bauer	Visual Aid Comm.
Sales Executives Club of Pittsburgh	Sales Dept. Tar Products	Cooke Bausman, Jr. F. C. Foy	
Sales Executive Council of the Baltimore Assn. of Commerce	- Metal Products	J. L. Tunstead,	Education Comm.
Society for the Advancement of Management	Industrial Rela- tions Dept.	L. A. Allen, V. H. Viot D. D. Hicks R. F. Dean E. J. Martin S. Hobbs J. R. Blair	Chairman, Industri- al Relations Round table.
	Metal Products	J. Dennis D. R. Tarallo H. C. Lancaster	
Society of American Engineers	Wood Pres. Div.	M. F. Cravey	
Society of American Military En- gineers	E. & C. Div.	J. R. Clarke C. F. Schumann P. G. Shanor K. Yaromey R. Berg	
Society of Automotive Engineers	Metal Products	B. W. Deringer T. F. Naylor S. H. Fedan R. D. Taber	
	T. & T. Dept.	J. F. Haley,	Transportation and Maintenance Activ- ity.
Society of Automotive Engineers Technical Board	Metal Products	J. W. Pennington	
Society of Chemical Industry	E. & C. Div. Research Dept. Tar Products	C. D. Ulmer Dr. A. R. Powell E. O. Rhodes	
Society of Gas Lighting	Gas and Coke Chemical Div. Gas & Coke Div. Production Metal Products	K. R. Hare D. M. Rugg M. T. Herreid Fred Denig G. C. Pfaff	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Society of Military Engineers	Franki Foundation Company	A. J. Bulger	
Society for Non-Destructive Testing, Inc.	Metal Products	E. A. Hale	
Society of Plastic Engineers	Chemical Div.	W. J. Fitzgerald J. W. LaBelle,	Serves as National Secretary of this organization.
Society of Plastic Industry	Chemical Div.	D. M. Rugg T. C. Keeling, Jr., C. H. Pottenger,	Injection Molders Comm. for National Defense. Adhesives.
Society of Rheology	Tar Products	W. F. Fair	
S. C. Society of Safety Engineers	Wood Pres. Div.	R. M. Killey	
Southern and Southwestern Railway Club	Metal Products	A. F. Brown	
Southern Gas Assn.	Tar Products	H. E. Crane, J.E.B. Gibbons	Member Advisory Council.
Southern Seedmen's Association	Wood Pres. Div.	R. M. Killey	
Southwest Shippers Advisory Board	Wood Pres. Div.	C. F. Seyer	
Special Libraries Association	E. & C. Div.	C. D. Ulmer	
St. Andrew's Society of Charleston	Wood Pres. Div.	R. M. Killey	
St. Clair County Taxpayers Assn.	Tar Products	L. Cherrone	
St. Paul Engineers Society	Gas & Coke Div. (Minnesota Plant)	J. H. Brown W. D. Levie T. H. Rauen,	on Committee
St. Paul Association of Commerce	Gas & Coke Div. (Minnesota Plant)	A. W. Lundquist R. J. Wheeler	
St. Paul Association of Credit Men	Gas & Coke Div. (Minnesota Plant)	R. J. Wheeler	
Steel Club of Baltimore	Metal Products	J. M. Kalista,	Entertainment Comm.
Suburban Fuel Dealers Assn.	Gas & Coke Div. (Seaboard Plant)	T. J. Leather R. Williamson	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Synthetic Organic Chemical Manufacturers Association	Chemical Div.	D. M. Rugg	
Systems and Procedures Assn. of America	Chemical Div. Control Section	W. T. Gibson W. H. Donohue	
Tax Foundation	Koppers-General	C. M. Crick	
Technical Assn. of Pulp and Paper Industry	Chemical Div.	J. F. Corwin	
Tennessee Road Builders Assn.	Tar Products	F. G. Owen, Sr.	
Tennessee Valley Electric Institute	Wood Pres. Div.	W. D. Jetton	
Texas Manufacturers Assn.	Tar Products Wood Pres. Div.	R. M. Smith C. F. Seyer	
Traffic and Transportation Assn. of Pittsburgh	Traffic and Transportation	Various personnel of T. & T. Dept.	
<u>Traffic Clubs</u>			
Baltimore	Metal Products	L. J. Canter, Chairman, Nominating Committee H. V. Kraft	
Chicago	Wood Pres. Div.	C. E. Masini	
Charleston	Wood Pres. Div.	R. M. Killey	
Jersey City	Gas & Coke Div.	H. L. Francis	
New York	Gas & Coke Div.	H. L. Francis	
Newark	Gas & Coke Div.	H. L. Francis	
Pittsburgh	T. & T. Dept.	J. B. Keeler, Chairman, Reception Committee J. F. Haley, Annual Dinner Comm. E. A. Gorges, Board of Governors Vice Chairman, House Committee H. B. Wilson, Membership Comm. J. D. Counahan R. E. Spatz	
Texarkana	Wood Pres. Div.	C. F. Seyer	

<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Transportation Association of America	T. & T. Dept.	J. B. Keeler,	Alternate for Gen. Somervell.
Transportation Club of St. Paul	Gas & Coke Div. (Minnesota)	George Sack,	On Committee
Transportation Council to the Sec. of Commerce	T. & T. Dept.	J. B. Keeler,	Member (Special Assignment)
United Roofing Contractors Assn.	Tar Products	J. A. Seifert D. D. Hamilton J. T. Tierney F. G. Owen, Sr.	
U. S. Independent Telephone Assn.	Wood Pres. Div.	J. M. Irvine	
Virginia Manufacturers Assn.	Wood Pres. Div.	D. L. Skelky	
Water & Sewage Manufacturers Assn.	Tar Products	G. E. Boyd H. E. Crane	
West Coast Manufacturers Assn.	Tar Products	G. E. Traut	
West Coast Wood Preservers Assn.	Tar Products	S. J. Katz	
West Hudson Kiwanis	Tar Products	J. V. Ferris	
Western Railway Club	Metal Products Wood Pres. Div.	J. E. Onnen H. C. Busch	
Western Society of Engineers	E. & C. Div.	G. G. Bigelow W. B. Ferguson A. B. Fisher, Jr. Gordon Fox E. A. Lejeck R. K. Matthews E. J. McCormick H. W. Peterson W. C. Schofield E. J. Westcott M. F. Young	
Western States Blast Furnace and Coke Oven Association,	E. & C. Div.	F. M. Schweinberg	
West Tennessee Electric Institute	Wood Pres. Div.	W. D. Jetton	
West Virginia Contractors Assn.	Tar Products	F. B. Long	
West Virginia Independent Telephone Association	Wood Pres. Div.	D. C. Smith	
West Virginia Sewage and Industrial Wastes Assn.	Tar Products	W. M. Lee	

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<u>Name of Association</u>	<u>Division Membership</u>	<u>Company Representative</u>	<u>Position of Representative In Organization</u>
Wisconsin Independent Telephone Association	Wood Pres. Div.	A. R. Mickel	
Wood Preserving Industry Traffic Conference	Traffic and Transportation Dept.	E. A. Gorges,	Secretary

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IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

IN RE: ALL ASBESTOS LITIGATION
FILED BY THE SIMMONS FIRM, LLC,

Plaintiffs,

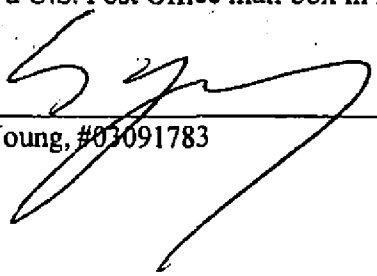
vs.

A.W. CHESTERTON, et al.,

Defendants.

PROOF OF SERVICE

The undersigned certifies that the foregoing Memorandum for Clerk was served upon Counsel to the above cause by enclosing the same in an envelope addressed to such attorney at their business address as disclosed on the attached service list with postage fully prepaid and by depositing said envelope in a U.S. Post Office mail box in Belleville, Illinois on the 26th Day of June, 2002 at 5:00 p.m.


Eric C. Young, #03091783

Plaintiff	Simmons Law Firm LLC 707 Berkshire Blvd. East Alton, IL 62024 618-251-2222; fax: 618-251-2251
Amoco Oil Atlantic Ritchfield (successor to Sinclair Oil) Sinclair Oil	Alan Zerkowitz/John v. Smith Pretzel and Stouffer One South Wacker Drive, Suite 2500 Chicago, IL 60606-4673 312-578-7456; fax: 312-346-8242
A. P. Green / Harbison Walker Anchor Packing / Chicago Fire Brick Foster Wheeler / Garlock Weavexx / Treedale (Pittsburgh Metals) Viking Pump, Inc. Albany International	Wm. Mahoney/ Cameron Turner/ Lawrence Finn Segal, McCambridge One IBM Plaza, 330 North Wabash, Suite 200 Chicago, IL 60611 312-645-7800; fax: 312-645-7711 clumer@smsm.com
A. W. Chesterton Congoleum Durabla / Plibrico Riley Stoker Sears, Roebuck & Company	John Kurowski Kurowski & Bailey, P.C. 24 Bronze Pointe Swansea, IL 62226 618-277-5500; fax: 618-277-6334
Abex Corporation	Robert Scott Swain, Hartshorn & Scott 411 Hamilton Blvd., #1806 Peoria, IL 61602 309-637-1700; fax: 309-637-1708
AcandS	Nicole Behnen / Andrew Cross Polsinelli Shalton & Welte 100 South Fourth Street, Suite 1110 St. Louis, MO 63102 314-231-1950; fax: 314-231-1776 e-mail: across@pswlaw.com
Bowater	Kurtis Reeg Leritz, Plunkert & Bruning, P.C. One City Centre, Suite 2001 St. Louis, MO 63101 314-231-9600; fax: 314-231-9480

Asten Group	Stacey Steneczko Hinshaw & Culbertson (Waukegan) 110 North West Street Waukegan, IL 60085-4330 847-244-0551; fax: 847-249-4755
Big River Zinc Corp.	David A. Nester Nester & Constance, P.C. 123 West Washington Street Belleville, IL 62220-2021 618-234-4440; fax: 618-234-6193
Borg-Warner / Certain-Teed A. T. Callas / C.E. Thurston Maremont / National Gypsum Shook & Fletcher Union Carbide / Amchem / Montello, Inc. Sinclair Oil / Atlantic Richfield (co-counsel) Southern IL Power Coop / Amoco Oil TH Agriculture / Harcross Chemicals D&F Distributing / Flexitallic / T&N PLC Ford Motor Company (co-counsel) Missouri Drywall Supply, Inc. Bombardier Capital, Inc., Bombardier Capital Rail, Inc., Bombardier Transit Corporation and Bombardier, Inc. Reynolds Metals Company	Kent L. Plottner / Jennifer Johnson Heyl, Royster, Voelker & Allen P. O. Box 467 Edwardsville, IL 62025 618-656-4646; fax: 656-7940
Beazer East, Inc.	Eric C. Young Dunham, Boman & Leskera 208 North High Street Belleville, IL 62220 618-235-7222; fax: 618-236-2800 e-mail: db1103@mvp.net
Quigley Pfizer	William Lucco Lucco, Brown & Mudge 224 St. Louis Street Edwardsville, IL 62025 618-656-2321; fax: 656-2363

B.F. Goodrich Company Brandon Drying Fabrics Inland Steel / Ispat Inland, Inc. Southern Illinois Power Coop (SIPCO)	H. Patrick Morris / Kevin Owens Johnson & Bell, Ltd. 55 East Monroe Street, Suite 4100 Chicago, IL 60603 312-372-0770; fax: 312-372-9818
Bondex / Georgia Pacific Georgia Pacific (Hudson Pulp & Paper) Carborundum / Lockport Dryer Felts Marathon Oil / Ameren UE / CIPS Grays Harbor Paper / Dow Chemical Hollingsworth & Vose / Marcal Paper Illinois Power / Swift & Co. Commonwealth Edison (co-counsel) Union Electric Company, a/k/a ameren UE	Jeffrey S. Hebrank Burroughs, Hepler, et al. P. O. Box 510 Edwardsville, IL 62025 618-656-0184; fax: 618-659-9277 e-mail: mkw@ilmolaw.com
Brauer Supply AEROJET	Francis Duda / Joel Monson Anderson & Gilbert 200 South Hanley Road, Suite 710 St. Louis, MO 63105 314-721-2777; fax: 314-721-3515
Sprinkman Sons Corp. Marley Cooling Tower Co. Sprinkman Sons Corporation of Illinois	Robert J. Brummond Foley & Mansfield POB 56580 St. Louis, MO 63156 314-367-7060; fax: 314-367-9945 Cathy Molchin Cathy Molchin, P.C. 4909 Sir Lionel Court Mapleton, IL 61547 309-633-0935; fax: 309-633-0936
Abex Carlisle Corporation General Dynamics Westvaco / Weyerhaeuser Longview Fibre Nestle Purina Petcare	Ray Fournie / Anita Kidd Armstrong Teasdale One Metropolitan Square, #2600 St. Louis, MO 63102-2740 314-621-5070; fax: 314-621-5065
Cerro Copper Products Company	Thomas Ducey Ducey & Associates, P.C. 20 Bronze Pointe Swansea, IL 62226 618-233-1358; fax: 618-234-9560

Combustion Engineering Triangle Insulation Westinghouse Electric Wise El Santo Mallinckrodt	Daniel G. Donahue / Ann Hatch Herzog, Cregs & McGhee 1 City Centre, 24th Floor 515 North 6th Street St. Louis, MO 63101 314-231-6700; fax: 314-231-4656
Commonwealth Edison (ComEd)	Michael Freeborn / Michael Franz Freeborn & Peters 311 South Wacker Drive, Suite 3000 Chicago, IL 60606 312-360-6000; fax: 312-360-6520
Corhart, Ingersoll-Rand, Sidener Supply Halliburton Technical Services Electric Engergy, George P. Reintjes Ferro Enginnering / Ogelbay Aurora / Hydromatic Pumps	Susan Gunty / Paul VanLysebettens Gunty & McCarthy 150 South Wacker Drive, Suite 1025 Chicago, IL 60606 312-541-0022; fax: 312-541-0033
Crown Cork & Seal	Stephen Maassen Hoagland, Fitzgerald, Smith & Pranaitis 410 Market Street, P O Box 130 Alton, IL 62002 618-465-7745; fax: 618-465-3744
CSR, Ltd. Nooter J-M A/C Pipe Corporation Consolidated Aluminum Cupples Products, Inc.	David Coffman Lewis, Rice & Fingersh 500 North Broadway, Suite 2000 St. Louis, MO 63102 314-444-7600; fax: 314-241-6056
Nooter (co-counsel)	W. Jeffrey Muskopf / Jim Mendillo Freeark, Harvey, Mendillo, et al. 115 West Washington, POB 546 Belleville, IL 62222 618-233-2686; fax: 618-233-5677
Delco-Moraine (GM)	John D. Warner, Jr. Gault & Warner, LLC 222 South Central, #500 Clayton, MO 63105 314-863-2230; fax: 314-863-2348

General Motors	Gregory Cerulo Quinn, Johnston, Henderson & Pretorius 227 N.E. Jefferson Street Peoria, IL 61602 309-674-1133; fax: 309-674-6503
Daimler Chrysler	Maureen McGlynn McGlynn & McGlynn, L.L.C. 222 South Central Avenue, Suite 1101 St. Louis, MO 63105 314-727-1000; fax: 314-727-2960
Ford Motor Company	John A. Krivicich Donohud, Brown Mathewson & Smyth 140 South Dearborn Street, Suite 700 Chicago, IL 60603 312-422-0900; fax: 312-422-0909
Doyle Equipment Company Kimberly - Clark Scott Paper	David T. Butsch Green, Schaaf & Jacobson, P.C. 7733 Forsyth Blvd., Suite 700 Clayton, MO 63105 314-862-6800; fax: 314-862-1606
Dresser Industries Halliburton Company Halliburton Energy Services Worthington Pump	Bryan Skelton Reed, Armstrong, et al. P. O. Box 368 Edwardsville, IL 62025 618-656-0257; fax: 618-692-4416
Flintkote	Bart Sullivan Sandberg, Phoenix & von Gontard One City Centre, 15th Floor St. Louis, MO 63101 314-231-3332; fax: 314-241-7604
General Electric ASARCO, Inc.	Ronald L. Hack Gallop, Johnson & Neuman 101 South Hanley, Suite 1600 St. Louis, MO 63105 314-615-6000; fax: 314-615-6001

General Gasket	A. J. Bronsky Brown & James, P.C. (St. Louis) 1010 Market Street, 20th Floor St. Louis, MO 63101 314-421-3400; fax: 314-421-3128
Azrock/Domco, Inc. Harwick Standard Distribution AlliedSignal/Bendix Honeywell International	Beth Kamp Veath Brown & James, P. C. (Belleville) 120 West Main Street, 2nd Floor Belleville, IL 62220-1502 618-235-5590; fax: 235-5591 e-mail: bveath@bjpc.com
General Refractories Young Insulation Boise Cascade Corp. American Biltrite / LaSalle Steel Sprinkmann Sons	Thomas Kernell Roberts, Perryman One USBank Plaza, Suite 2300 St. Louis, MO 63101 314-421-1850; fax: 314-421-4346
Dow Chemical	Gerard T. Noce / W. Allan Murray NOCE & BUCKLEY, LLC 515 Olive Street, Suite 800 St. Louis, MO 63101 314-621-3434; fax: 314-621-3485
Illinois Bell Telephone Company	Timothy Hayes & Associates 120 South Central Avenue, #1880 St. Louis, MO 63105 314-726-6767; fax: 314-726-6765
IREX	Steven W. Celba Celba & Des Rochers 4493 North Prospect Avenue Milwaukee, WI 53211 414-906-0626; fax: 414-906-0631
J. P. Bushnell Packing	Michael Noakes / Gregory Dioneda Moser & Marsalek, P.C. 200 North Broadway, Suite 700 St. Louis, MO 63102-2730 314-421-4364; fax: 314-421-5640

John Crane, Inc.	Edward M. Burns Law Office of William M. Koziol One Kemper Drive Long Grove, IL 60049-0001 fax: 847-320-4347
Kaiser McDonnell Aircraft & Missile Systems American Standard (of counsel) McDonnell Douglas/Boeing Gardner Denver	Becky Jackson / Dennis O'Connell Bryan, Cave 211 North Broadway, Suite 3600 St. Louis, MO 63102-2750 314-259-2000; fax: 314-259-2020
Metropolitan Life	Charles L. Joley Donovan, Rose, Nester 8 East Washington Street Belleville, IL 62220-2190 618-235-2020; fax: 618-235-9532 Ed Crane Skadden, Arps, Slate, Meagher & Flom 333 West Wacker Drive Chicago, IL 60606-1285 fax: 312-407-0411
3M (Minnesota Mining & Manufacturing) - Norfolk Southern / Norfolk & Western Illinois Central Railroad A. O. Smith	Richard Boyle / Tom Peters / Curtis Picou Gundlach, Lee, Eggmann, Boyle & Roessler 5000 West Main Street, Box 23560 Belleville, IL 62223 618-277-9000; fax: 618-277-4594
A. O. Smith	James R. Niquet Crivello, Carlson, Mentkowski & Steeves, S. C. 710 North Plankinton Avenue Milwaukee, WI 53203 fax: 414-271-4438

Lorillard Sherwin-Williams Bunge Corporation	Tracy Jonathan Cowan Thompson Coburn (St. Louis) One Firststar Plaza St. Louis, Mo 63101 314-552-6040; fax: 314-552-7597 e-mail: tcowan@thompsoncoburn.com Kurt Reitz / Thomas Alvey Thompson Coburn (Belleville) 525 West Main Street, POB 750 Belleville, IL 62222-0750 618-277-4700; fax: 618-236-3434
Mt. Vernon Mills, Inc.	Jerome Duchowicz O'Hagan, Smith & Amundsen, LLC 150 North Michigan Avenue., #3300 Chicago, IL 60601 312-894-3200; fax: 312-894-3210
Monsanto Olin Union Oil Company of California (Unocal) PolyOne	Mark Zellmer Husch & Eppenger 190 Carondelet Plaza, #600 St. Louis, MO 63105-3441 314-480-1500; fax: 314-480-1505
Occidental	William Schopf Schopf & Weiss 312 West Randolph, Suite 300 Chicago, IL 60606 312-701-9300; fax: 312-701-9335 e-mail: swedenborg@sw.com (Lisa Swedenborg)
Peavey Paper Mills	Scott A. Nielson Henson & Efron 400 Second Avenue South, Suite 1200 Minneapolis, MN 55401-2496 612-339-2500; fax: 612-339-6364 e-mail: snielson@hensonefron.com

PPG Rapid American	Dennis J. Graber Hinshaw & Culbertson (Belleville) 521 West Main Street, Suite 300, POB 509 Belleville, IL 62222 618-277-2400; fax: 618-277-1144 Craig Liljestrand / Daniel McGrath Hinshaw & Culbertson (Chicago) 222 North LaSalle Street, Suite 300 Chicago, IL 60601-1081 fax: 312-704-3001
Premcor Refining Group Clark Oil	Jaimy Hamburg / Susan Cowell Mayer Brown Rowe & Maw 190 South LaSalle Street Chicago, IL 60603-3441 312-782-0600; fax: 312-701-7711 e-mail: jhamburg@mayerbrown.com
Sager Corporation	James Carter Carter Law Offices 416 Main Street, Suite 529 Commerce Bank Bldg., 15th Floor Peoria, IL 61602 309-673-3517; fax: 309-673-3318
Anheuser-Busch Caterpillar Shell Goodyear Tire Kraft Foods, Inc.	Thomas Orris Williams, Venker & Sanders 10 South Broadway St. Louis, MO 63102 314-345-5000; fax: 314-345-5055
Simkins Industries, Inc.	Martin M. Ruken Meltzer, Purtill & Stelle LLC 1515 East Woodfield Road Second Floor Schaumburg, IL 61073-5431 847-330-2400; fax: 847-330-1231 e-mail: www.mpslaw.com
Surface Combustion	Richard R. Malone Malone, Ault & Farrell 405 Madison Avenue, Suite 2300 Toledo, OH 43604 419-242-6066; fax: 419-242-1605

Texaco	Michael Trucco Stamos & Trucco Ten North Dearborn, 5th Floor Chicago, IL 60602 312-630-7979; fax: 312-630-1183
Thermic Refractories, Inc.	Stephen J. Potter / James Corrigan Behr, McCarter & Potter, P.C. 7777 Bonhomme Avenue, #1810 St. Louis, MO 63105 314-862-3800; fax: 314-862-3953
Uniroyal (O'Hara) John Deere & Co. (Fischer) Mobil Corp./Socony (Burke)	Joseph O'Hara, Jr. / Matthew Fischer / Fiona Burke Schiff, Hardin & Waite 6600 Sears Tower 233 South Wacker Drive Chicago, IL 60606-6473 312-258-5500; fax: 312-258-5700 e-mail: mfischer@schiffhardin.com
Owens-Illinois	Robert Riley Schiff, Hardin & Waite 7200 Sears Tower Chicago, IL 60606 312- ; fax: 312-258-5600
Westinghouse Air Brake American Standard, Inc.	James Toohey / Joseph Janatka Ross & Hardies 150 North Michigan Avenue Chicago, IL 60601-7567 312-558-1000; fax: 312-750-8600
Wheeler Protective	Robert W. Wilkinson Dogán & Wilkinson, P.L.L.C. 726 Delmas Avenue, P. O. Box 1618 Pascagoula, MS 39568-1618 228-762-2272; fax: 228-762-8246
CSX Transportation, Inc.	Richard F. Nash Brasher Law Firm, L.C. 211 North Broadway, Suite 2300 St. Louis, MO 63102 314-621-7700; fax: 314-621-1088

Consolidated Rail	Donald J. Dahlman Walker & Williams, P.C. 4343 West Main Street Belleville, IL 62226 618- Thomas W. Alvey, Jr. Thompson Coburn (Belleville) 525 West Main Street, P. O. Box 750 Belleville, IL 62222-0750 618-277-4700; fax: 236-3434
United States Steel (USX)	Tad Armstrong 101 West Schwartz Street P. O. Box 565 Edwardsville, IL 62025 fax: 656-6808 Joseph Ostrowski Baughman & Associates 55 Public Square, Suite 2215 Cleveland, OH 44113 216-687-1244; fax: 216-621-4066 Edward J. Matushek / David A. Nilles Matushek & Associates One North LaSalle Street, #3210 Chicago, IL 60602 312-750-1215; fax: 312-750-1273 e-mail: danilles@matushek.com
SCAPA	Dan O'Connell / John O'Sullivan / John Tammes O'Connell & O'Sullivan 217 N. McLean Blvd., Suite 2-C Elgin, IL 60123 847-741-4603; fax: 847-741-4692
Hammermill Paper Company International Paper Company/Champion International Paper Company/Hammermill International Paper Company/Nicolet Champion International Corporation	Michael J. Kanute / Michael L. Volin Holland & Knight, LLP 55 West Monroe, Suite 800 Chicago, IL 60614 312-263-3600; fax: 312-578-6666

International Harvester Company	Martin H. Katz Katz Huntoon & Fieweger, P.C. 1705 Second Avenue, POB 3250 Rock Island, IL 61204-3250 309-788-5661; fax: 309-788-5688
Ashland, Inc.	Larry J. Chilton Chilton, Yambert, Porter & Coghlan 150 South Wacker Drive, Suite 2400 Chicago, IL 60606 312-460-8000; fax: 312-460-8299
Marcal Paper Mills, Inc.	Robert J. Luddy Windels Marx Lane & Mittendorf 156 West 56th Street New York, NY 10019 212-237-1000; fax: 212-262-1215 e-mail: rluddy@windelsmarx.com
ACME Steel Company	James Dobeus Cremer Kopon Shaughnessy & Spina LLC 180 North LaSalle, Suite 3300 Chicago, IL 60601 312-726-3800; fax: 312-726-3818
DuPont	Russell W. Baker, Jr. Spence Fane Britt & Brown (Kansas City) 1000 Walnut Street, Suite 1400 Kansas City, MO 64106-2140 816-474-8100; fax: 816-474-3216 e-mail: rbaker@spencerfane.com
Technical Products, Inc.	Leo W. Nelsen Holtkamp Liese Childress & Schultz 217 North 10th, Pennsylvania Bldg., #400 St. Louis, MO 63101-2003 314-621-7773; fax: 314-231-4384 e-mail: lnelsen@holtkampliese.com
Lear Siegler (Thomas & Betts)	Erin L. Alexander McBride Baker & Coles 500 West Madison, 40th Floor Chicago, IL 60661 312-715-5700; fax: 312-993-9350

Reynolds Metal Co.	Richard L. Miller, II Butler Rubin Saltarelli & Boyd 70 West Madison, Suite 1800 Chicago, IL 60602-4257 312-444-9660; fax: 312-444-9287
Air Products & Chemicals	Stephen Rovak Sonnenschein Nath & Rosenthal One Metro Square, Suite 3000 St. Louis, MO 63102 314-241-1800; fax: 314-259-5959
LTV Steel Co.	Ezio Listati 200 Public Square, #40-104 Cleveland, OH 44114 216-622-5701; fax: 216-642-7062
Lever Brothers Company	Cory D. Anderson Connelly Roberts & McGivney LLC One North Franklin, Suite 1200 Chicago, IL 60606-3401 312-251-9600; fax: 312-251-9601
Emmerson Electric	Daniel G. Nienhuls von Briesen, Purtell & Roper 735 North Water Street Milwaukee, WI 53202 414-273-7000; fax: 414-273-7897 e-mail: dnienhul@vonbriesen.com
Merck & Co., Inc.	Jennefer K. Fardy Seyfarth Shaw 55 East Monroe, Suite 4200 Chicago, IL 60603-5803 312-346-8000; fax: 312-269-8869 e-mail: jfardy@seyfarth.com
Gulf Coast Marine Supply Company	Marcy Bryan Forman Perry Watkins Krutz & Tardy PLLC One Jackson Place, Suite 1200 188 East Capitol Street (POB 22608) Jackson, MI 39225 601-960-8600; fax: 601-960-3241 e-mail: ctownsend@fpwk.com

J.S. Alberici Construction Co.	Lisa M. Warrer Rabbitt, Pitzer & Snodgrass, P.C. 800 Market Street, Suite 2300 St. Louis, MO 63101 314-421-5545; fax: 314-421-3144 e-mail: warrer@rabbittlaw.com
Missouri Drywall Supply, Inc.	Sona Rewari / Alexandra Brisky Hunton & Williams 1751 Pinnacle Drive, Suite 1700 McLean, VA 22102 703-714-7000; fax: 703-714-7410 e-mail: abrisky@burton.com
	CENTRAL RECORDS DEPOSITORY 203 West High Street Edwardsville, IL 62025

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

IN RE: ALL ASBESTOS LITIGATION	)	
FILED BY THE SIMMONS FIRM, LLC,	)	
	)	
Plaintiffs,	)	
vs.	)	
	)	
A.W. CHESTERTON, et al.,	)	
	)	
Defendants.	)	

**BEAZER EAST, INC., AS SUCCESSOR IN INTEREST TO KOPPERS COMPANY,
INC.'S OBJECTIONS AND ANSWERS TO INTERROGATORIES**

Now comes Beazer East, Inc., Individually, and as Successor to Koppers Company, Inc., and Incorrectly Identified as Successor in Interest to Thiem Corporation and Universal Refractories Company, and for its objections and answers to interrogatories submitted by The Simmons Firm, L.L.C., states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. Defendant objects to the overly broad and burdensome nature of these interrogatories. They are overly broad and unduly burdensome insofar as they request information and documents covering over 50 years and information which might be contained in over 27,000 boxes of material which are not indexed in any way relevant to this litigation. Many of the individuals who might have had personal knowledge of the matters to which these interrogatories relate are either deceased or otherwise unavailable to this defendant. Various divisions of this defendant were sold in the 1980's and information and/or documents which are in control of the acquiring companies are no longer available for review by this defendant. Investigation and discovery into the matters requested in these interrogatories is ongoing and this defendant states that it will make available to the plaintiffs

for inspection and copying non-privileged documents related to the products described which it has gathered to date and reserves the rights to supplement the responses as additional information becomes available. This preliminary statement and general objections apply to all of the discovery requests and responses. Notwithstanding this objection, Defendant believes that it has exercised due diligence to secure the information and refers Plaintiff to the response to Interrogatory #2 which sets forth the efforts made to respond. Defendant further objects because at this time it is unknown whether any individual Plaintiffs' alleged exposure was to roofing products or to products used in the steel making process and, therefore, the discovery requests are not limited to products relevant to this litigation.

PLAINTIFFS' INTERROGATORIES

Please take notice that pursuant to Illinois Supreme Court Rule 213(d), you are required to serve sworn answers upon the undersigned to the following interrogatories within twenty-eight (28) days after service hereof. The defendant corporation or company shall designate an officer or agent who will answer the interrogatories by providing all of the information available to the organization whether the answering individual personally knows it or not. Each interrogatory is to be answered fully and separately.

PLAINTIFFS' INSTRUCTIONS

With respect to all questions, all information is to be divulged which is within the knowledge, possession or control of the corporation or company to whom these interrogatories are addressed, as well as the corporation or company's attorneys, investigators, agents, employees or other representatives.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, then state and answer to the fullest extent possible, specifying

your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to acquire the information.

You are to answer the following interrogatories by placing your answers, when possible, in the spaces provided.

DEFINITIONS

- A. "Defendant," as used herein, includes the above-named defendant.
- B. "Predecessor" or "predecessor entity or company" as used herein means any entity which owned any assets or owner's equity of this defendant at any time prior to and including the present. The term predecessor or predecessor entity or company as used herein specifically includes any parent entity which now owns or has in the past owned ten percent or more of the named defendant either directly or indirectly through another entity.
- C. "Related company" is as defined in Judge Byron's Order of April 14, 2000.
- D. "Asbestos-containing product" as used herein means any product which included any form of asbestos as any part of its composition or ingredients. This term shall also mean any equipment or machinery, including but not limited to, boilers, generators and turbines, in or on which an asbestos-containing product as defined above was incorporated, added, utilized or applied prior to being sold, distributed or installed by this Defendant.
- E. "Documents," as used herein, include, without limitation, books, records, notes, letters, correspondence, memoranda, writings, invoices, purchase orders, contracts, sales ledgers, recordings, journals or books of account, in possession or control of Defendant or Defendant's attorneys, investigators, agents, or employees. Such reference to documents includes originals and copies, microfilms and transcripts made, recorded, produced or reproduced by any every means.

"Documents" also includes the content of any applicable computer database.

F. Where used with respect to documents, "identify" means to give the date, title, origin, author and addressee of the document and the name, address, position or title of the person who has custody of the document. Whenever identification is requested and Defendant is willing to produce the documents voluntarily, Defendant may respond by attaching a copy of the responsive document to the answers to these interrogatories.

Where used with respect to a person, "identify" means to give the person's name, employer, title or position with that employer, and business address and last known home address if the person is no longer so employed. If the person identified is, or has been, an employee, officer, director or agent of Defendant, also state the period of time during which he/she has been employed by Defendant, and all positions, titles or jobs that person has held with the Defendant and the years each position was held.

G. Where appropriate, the singular includes the plural and vice-versa.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the person answering these interrogatories on behalf of Defendant.

ANSWER:

Jill Blundon, former Vice-President and General Counsel of Thiem Corporation only on the issues of the corporate relationships of Thiem, Universal, Koppers and Beazer and Mary D. Wright, Esquire, Litigation Manager of Beazer East, Inc., in consultation with counsel.

INTERROGATORY NO. 2:

Has the person answering these interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely upon these answers as the truthful and complete

answers made on behalf of Defendant? List any and all such sources of information relied upon, including, but not limited to, identifying any and all records or documents reviewed and persons providing information.

ANSWER:

See the General Objections. Since there is no current employee with knowledge concerning all of the information requested, Mary Wright bases her knowledge upon corporate information, corporate documents and prior discovery responses and depositions including the depositions produced which are:

Charles Flickinger	06/11/98
	06/23/97
Donald McGraw, M.D.	06/24/97
Drew Bachman	06/20/97
Duane W. Caves	06/28/84
Edwin J. Davidson	07/21/94
Walter Richard Sylvester	10/27/93
	10/07/83
	05/09/88
	01/19/94
Byron Lee Allison, III	06/24/97
Elizabeth Lyle	06/23/97
Mary Dombrowski Wright, Esq.	06/27/97
Jill Blundon, Esq. -	04/13/94
	01/19/94
Regis Frederick	10/07/83
	06/07/88
	07/21/94

She is also familiar with the corporate history based upon her employment with the defendant since 1985 and based upon her review of the following documents:

Annual Reports: 1944 - 1988;
Material Safety Data Sheets on roofing;
Universal hot top product information;
State and SEC filing regarding the acquisition of Thiem and merger into Koppers subsidiary;
Sale of Thiem to National Starch;
Dissolution of Thiem Corporation, 1991;
Asset Purchase Agreement for Sale of Universal to Walt Sylvester;
Labels for rolled roofing;
Sweets Manuals from 1964 to 1985;

1953 Memberships and Representatives for Koppers;
Koppers Company and Beazer East, Inc. Insurance Coverage Information;
Thermal Insulation Manual by Koppers, 1952;
Subscriptions listing from Monroeville library;
EPA documents and EPA/roofing related information;
In-house memos re: OSHA/NIOSH regulations;
Information re: Aluminum Roof Coating 435;
Koppers Company Asbestos-Containing Roofing Products Listing;
Price List for some products including some asbestos roofing products;
Articles/memos from outside sources re: asbestos and asbestos in roofing materials;
Internal memo re: worker health and safety product liability claim;

INTERROGATORY NO. 3:

State the following concerning this Defendant:

- (a) Full and correct name;
- (b) The form in which Defendant presently conducts business (i.e. corporation, partnership, proprietorship, etc.);
- (c) Identify any and all predecessors and related companies as defined above;
- (d) Any and all other forms in which defendant has conducted business at any time, and the date(s) when business was conducted in each form;
- (e) Any and all names by which Defendant has been known or has conducted business, at any time, and the date(s) during which Defendant has been known by and/or conducted business, under each such name;
- (f) Defendant's principal place of business;
- (g) Defendant's present state of incorporation or state in which Defendant is registered as a partnership, association, etc., whichever is applicable; if Defendant has, at any time, been incorporated or registered in a different state, identify which state and when;
- (h) Most recent date of incorporation or reincorporation, and any and all prior date(s) of incorporation or reincorporation;
- (i) Whether this Defendant is authorized to transact business in the State of Illinois and, if so, the date such authority was first issued and last renewed;

- (j) If this Defendant has an agent, representative or place of business in Illinois, identify such agent, representative, or place of business; and,
- (k) If this Defendant has an agent for service in the State of Illinois, identify the registered agent.

ANSWER:

(a) Beazer East, Inc.; (b) Corporation; (c) See response to number 10; (d) Koppers Company, Inc. was incorporated as a Delaware corporation in 1944. On June 16, 1988, BNS, Inc. ("BNS"), a Delaware corporation and an indirect wholly owned subsidiary of Beazer PLC, acquired indirectly more than 90% of the outstanding common stock of Koppers Company, Inc. On November 14, 1988, BNS acquired indirectly the balance of the common shares. On January 26, 1989, the name of Koppers Company, Inc. was changed to Beazer Materials and Services, Inc. On April 16, 1990, Beazer Materials and Services, Inc. changed its name to Beazer East, Inc.; (f) Defendant does not have a principal place of business; (g) Delaware; (h) see Interrogatory 3(d); (i) yes, November 24, 1944; (j) no; (k) yes, CT Corporation System, 208 South LaSalle Street, Chicago, IL 60601.

INTERROGATORY NO. 4:

Has Defendant been sued under its correct legal name? If not, state the correct legal name of Defendant and provide the information requested in No. 3 above concerning the defendant as correctly named.

ANSWER:

Its correct name is Beazer East, Inc., formerly known as Koppers Company, Inc.

INTERROGATORY NO. 5:

Identify any and all persons or entities which own, or at any time have owned, more than a ten percent (10%) interest in this Defendant, and for each such person or entity identified, state the date(s) during which said person or entity owned more than a ten percent (10%) interest in Defendant and the specific type and amount of interest owned.

ANSWER:

Because Koppers Company, Inc. was in business from 1944 until 1988 and continued in business as Beazer East, Inc. until the present time, these Interrogatories are overly broad, burdensome and impossible of response. However, in an attempt to respond to the Interrogatories and pursuant to Illinois Supreme Court Rules, Defendant attaches copies of its annual reports from 1944 until 1988.

INTERROGATORY NO. 6:

Identify any and all companies, businesses, corporations, and/or joint ventures in which this Defendant owns, or at any time has owned, more than a ten percent (10%) interest and which engaged in the design, manufacture, selling, distributing, applying, installing or re-labeling of products containing asbestos.

ANSWER:

Defendant attaches copies of its annual reports from 1944 to 1988. At this time it is believed that only Thiem Corporation had asbestos products and only knew that its products contained asbestos at a time before Beazer had its interest in Thiem Corporation. In addition see response to number 10.

INTERROGATORY NO. 7:

With respect to each corporation, company, business or joint venture identified in response to Interrogatory No. 6 state:

- (a) The type of business, conducted by such related company;
- (b) The past and present business relationship(s) between said related company and Defendant;
- (c) The nature of the products or services which Defendant has sold to, or purchased from, said related company;
- (d) Whether or not said related company advertises or has advertised products or services supplied by Defendant;
- (e) Whether or not said related company sells or has sold Defendant's products or services within the State of Illinois and, if so, the approximate value of those sales from 1930 to date;

- (f) Whether or not said related company pays taxes of any type to the State of Illinois or to any political subdivision thereof and, if so, the type of taxes paid;
- (g) Whether or not Defendant controls or has controlled, directly or indirectly, in whole or in part, said related company's advertising; and,
- (h) The identity of any past or present officer or director of Defendant who, at any time, served as an officer or director of said related company.

ANSWER:

Because Koppers Company, Inc. was in business from 1944 until 1988 and continued in business as Beazer East, Inc. until the present time, these Interrogatories are overly broad, burdensome and impossible of response. However, in an attempt to respond to the Interrogatories and pursuant to Illinois Supreme Court Rules, Defendant attaches copies of its annual reports from 1944 until 1988. In addition see response to number 10.

INTERROGATORY NO. 8:

List all directors and officers of Defendant from 1940 to date and for each state all positions held and the date(s) during which each position was held.

ANSWER:

Because Koppers Company, Inc. was in business from 1944 until 1988 and continued in business as Beazer East, Inc. until the present time, these Interrogatories are overly broad, burdensome and impossible of response. However, in an attempt to respond to the Interrogatories and pursuant to Illinois Supreme Court Rules, Defendant attaches copies of its annual reports from 1944 until 1988.

INTERROGATORY NO. 9:

State whether any of Defendants' present or former officers or directors ever served (whether before, during or after becoming Defendants' officer or director) as an officer or director of any other company, corporation or business which manufactured, sold or distributed asbestos or asbestos-containing products and, if so, please:

- (a) Identify each officer and director of Defendant, who served as such other company's officer or director; and

- (b) Identify each company, corporation or business for which each such officer or director served, each position held by such officer or director for such other company, corporation or business, and the time periods each position was held.

ANSWER:

If any officer or director of the Defendant acted as an officer or a director of any other company, that person conducted that business beyond the scope of his or her capacity with this defendant. Thus, Defendant would have no information to allow it to respond to Interrogatory No. 9. The names of the officers and directors are included in the annual reports from 1944 until 1988 which are produced.

INTERROGATORY NO. 10:

Has Defendant ever acquired, through purchase, reorganization or merger, another company, corporation or business which manufactured, sold, processed, distributed or contracted to apply, asbestos and/or asbestos-containing products?

ANSWER:

Koppers Company, Inc. acquired the stock of Thiem Corporation. Thiem was an existing corporation having been incorporated in 1947. Thiem Corporation was merged into Koppers Subsidiary Company, a subsidiary corporation of Koppers, on March 4, 1977, and the surviving corporate entity was Thiem Corporation. Koppers owned the stock of Thiem as a wholly owned subsidiary corporation from 1977 until late 1988. The assets of Thiem Corporation were sold to National Starch and Chemical Company, now known as Henkel Surface Technologies, on December 28, 1988. Thereafter, Thiem existed only as a shell corporation until it was officially and legally dissolved on June 7, 1991 in Delaware.

Universal Refractories Corporation was incorporated in Wisconsin on October 23, 1957, as a wholly owned subsidiary of Thiem Corporation, and continued to operate as such until it was merged into Thiem on December 21, 1976. Universal's assets were sold to Walter R. Sylvester, an individual who had been employed as Vice-President of the Universal Division of Thiem, on December 27, 1983. At that point, Universal Refractories ceased to have any relationship with Koppers Company, Inc. or Thiem Corporation.

INTERROGATORY NO. 11:

If the answer to Interrogatory No. 10 is "Yes," with respect to each such predecessor:

- (a) State its full and correct name;

- (b) State its principal place of business;
- (c) State its State of incorporation;
- (d) State its date and manner of acquisition by Defendant;
- (e) Whether this predecessor was, at any time, authorized to transact business in the State of Illinois; and
- (f) Identify any and all documents referring to, relating to or reflecting the acquisition.

ANSWER:

- a-d. See the information provided in interrogatory #10 and see the documents produced.
- e. Investigation continues.
- f. See the documents produced as follows:

State and SEC filing regarding the acquisition of Thiem by Koppers subsidiary;
Sale of Thiem to National Starch;
Dissolution of Thiem Corporation, 1991;
Asset Purchase Agreement for Sale of Universal to Walt Sylvester.

INTERROGATORY NO. 12:

Has Defendant ever acquired from another corporation, company, or business, by any means other than those specified in Interrogatory No. 10, assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products?

ANSWER:

No.

INTERROGATORY NO. 13:

If the answer to Interrogatory No. 12 is "Yes," with respect to each such acquisition:

- (a) State the full and correct name of the company from which such assets or rights were acquired;
- (b) State the principal place of business of the company from which said assets or rights were acquired;

- (c) Describe the assets or rights acquired, including the specific asbestos-containing products to which said assets or rights related; and
- (d) Identify any and all documents referring to, relating to or reflecting the transaction.

ANSWER:

Not applicable.

INTERROGATORY NO. 14:

Other than any transaction identified in response to Interrogatories Nos. 10-13, has this Defendant ever been involved, in any capacity, including but not limited to, seller, transferor, grantor, franchisor, licensor, buyer, transferee, grantee, franchisee or subject of the transaction, in any transaction, of any kind, concerning any of the following:

- (a) the purchase/sale or transfer of ownership of a company, corporation or business which manufactured, sold, processed, distributed or contracted to apply asbestos and/or asbestos-containing products; or
- (b) the purchase/sale or transfer of ownership of the assets or rights to manufacture, sell, distribute or apply asbestos or asbestos-containing products; or
- (c) the purchase/sale or transfer of liabilities arising out of the manufacture, sale, processing, distribution or application of asbestos or asbestos-containing products.

ANSWER:

No.

INTERROGATORY NO. 15:

If the answer to any sub-part of Interrogatory No. 14 is "Yes," with respect to each such transaction:

- (a) Identify all parties to the transaction;
- (b) Identify the subject matter of the transaction;
- (c) State the date of the transaction; and,
- (d) Identify any and all documents, referring to, relating to or reflecting the transaction.

ANSWER:

Not applicable.

INTERROGATORY NO. 16:

State the first and last dates on which any asbestos-containing product was manufactured by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER:

(a) Beginning sometime in the mid to late 1960's when certain assets of Addex Company were acquired until sometime between 1984 and 1986, Beazer East, Inc. formally known as Koppers offered for sale certain asbestos containing roofing products. Koppers Company, Inc.'s roofing division offered for sale asbestos-containing felts saturated with either tar or asphalt from approximately 1964 until 1985. These products were sold as Koppers No. 15 Tar Saturated Asbestos Roofing Felt or Koppers No. 15 Asphalt Saturated Asbestos Roofing Felt. Koppers did not actually manufacture the felt, but merely saturated the felt purchase from third parties with tar or asphalt. In addition, see attached list of asbestos-containing roofing products manufactured by Koppers Company, Inc. and the Sweets Manuals which are produced. Further listing is contained in document entitled Koppers Company Asbestos Containing Roofing Products listing which has been produced. Finally, Koppers believed that for a brief period of time around 1980-1982, a roofing product named Exeltherm was produced which incorporated asbestos-containing paper. However, Defendant is continuing its investigation into this matter. As to the E and C division, see answer #22.; (b) Defendant has no predecessor company; and (c) during the time it was a wholly owned subsidiary of Thiem Corporation, Universal Refractories, Inc. manufactured asbestos containing products from 1969 until 1975 or January 1976 at the latest. Universal Refractories, Inc., while a wholly owned subsidiary of Thiem Corporation, manufactured foundry products called hot tops for the steel making industry. These products contained asbestos from approximately late 1969 until January 1976 at the latest. In late 1975, Universal substituted the asbestos in its product with Hedmanite that was purchased from a company called Hedman Mines. In 1979, Hedman began labeling its products "may contain asbestos." The Hedmanite was then removed from Universal's products.

As to the Beazer products, see the Sweets Manuals from 1964 to 1985, the information regarding Aluminum Roof Coating 435, the Koppers Company Asbestos-Containing Roofing Products Listing. For a more complete description of

the Universal Products, see the depositions of Davidson, Sylvester and Frederick and the Universal Hot Top Product information which have been produced.

INTERROGATORY NO. 17:

State the first and last dates on which any asbestos-containing product was specified, sold, distributed, applied and/or installed within the United States by:

- (a) Defendant;
- (b) each and every predecessor; and,
- (c) each and every related company.

ANSWER:

See Interrogatory No. 16.

INTERROGATORY NO. 18:

State the last date on which Defendant or any related company specified, sold, distributed, applied and/or installed any asbestos-containing product outside the United States and identify by brand or trade name the products so specified, sold, distributed, applied and/or installed.

ANSWER:

It is not believed that any of the roofing products were sold outside of the United States. It is not believed that any of the Universal hot top products were sold outside of the United States. The E & C Division was sold in 1984. Investigation continues as to locations outside of the United States where steel making facilities may have been constructed.

INTERROGATORY NO. 19:

Identify by full and complete trade name, any and all asbestos-containing products as defined above, which this Defendant, any related company, or any predecessor(s) has, at any time:

- (a) Designed;
- (b) Manufactured;

- (c) Processed;
- (d) Sold;
- (e) Distributed;
- (f) Applied;
- (g) Installed;
- (h) Patented;
- (i) Specified; or
- (j) Re-labeled.

ANSWER:

(a-e) See No. 16.; (f) None; (g) None. See No. 22; (h-j) None.

INTERROGATORY NO. 20:

With respect to each asbestos-containing product listed for each subpart of Interrogatory No.

19:

- (a) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product;
- (b) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product; and,
- (c) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, specified, sold, distributed, applied, installed, patented or re-labeled such product.

ANSWER:

See Interrogatory No. 16.

INTERROGATORY NO. 21:

Were any of the products, which were listed in response to Interrogatory No. 19 as having been specified, sold, distributed, applied or installed by Defendant, its predecessor or related company(ies), purchased from another company and relabelled for sale or distribution by Defendant, its predecessors or related companies? If so, identify those products, and with respect to each:

- (a) Identify the company from which Defendant, its predecessor or related company purchased the product; and,
- (b) Identify the company which manufactured the product; and,
- (c) State the date(s) during which said re-labeled product was sold, distributed or applied.

ANSWER:

No. Products were not re-labeled. Koppers did not actually manufacture any asbestos-containing felts, but merely saturated the felt purchased from third parties. The third parties were Carey, Celotex, GAF or Nicolette.

INTERROGATORY NO. 22:

Has this Defendant, at any time, applied, contracted to apply, installed or engaged in the business of applying or installing, asbestos-containing products? If so:

- (a) State the date(s) on which or during which Defendant applied, contracted to apply, installed or engaged in the business of applying or installing asbestos-containing products;
- (b) Identify any and all sites within the State of Illinois at which Defendant applied, installed or contracted to apply or install asbestos-containing products, and for each such site:
 - (i) State whether the products you applied, installed or contracted to apply or install were included as part of the project's contract price or whether you applied the products that were provided at the work site;
 - (ii) Identify by manufacturer and trade name each and every asbestos-containing product applied or installed;

- (iii) State the date(s) during which said application or installation took place;
- (iv) Identify the employee(s) of Defendant who was (were) in charge of the job;
- (v) Identify the person or entity for which the products were applied or installed; and
- (vi) Identify all documents relating to such contract, application or installation.

ANSWER:

The remainder of the interrogatory is objected to on the basis that it is overly broad and duly burdensome and not reasonably calculated to lead to the discovery of relevant information. **Koppers Company, Inc.'s Engineering and Construction Division designed and constructed steel making facilities.** Koppers E & C Division did not manufacture asbestos-containing products. Typically, the owners of facilities purchased the necessary material for projects from third parties who delivered these materials to the construction site. However, this practice varied with each customer and each contract. These materials may have included asbestos-containing products. Defendant is unable to identify all sites in Illinois, but if a specific plaintiff identifies the name of the location or job site, this defendant will make every reasonable effort to try to identify whether the E & C Division had any involvement with such facility.

INTERROGATORY NO. 23:

Has this Defendant, any predecessor or any related company, ever engaged in the business of mining asbestos? If so:

- (a) Identify which company(ies) whether (Defendant, predecessor or related company) engaged in said business;
- (b) State the date(s) during which each said company engaged in such business;
- (c) State each and every location at which such mining was done;
- (d) Identify each and every officer, employee and/or agent of said company who, at any time, was in charge of each mining operation; and,
- (e) Identify each and every entity, if any, to which said company sold the asbestos which was mined.

ANSWER:

No.

INTERROGATORY NO. 24:

Has this Defendant, any predecessor or any related company ever purchased and resold raw asbestos? If so, with respect to each such purchase and resale:

- (a) State the date(s) of the transaction;
- (b) Identify any and all parties from which the raw asbestos was purchased; and,
- (c) Identify any and all parties to which the raw asbestos was sold.

ANSWER:

No.

INTERROGATORY NO. 25:

Identify each and every source from which Defendant, any predecessor or related company, obtained raw asbestos and/or asbestos-containing material used by Defendant, any predecessor or related company, to manufacture or process any product listed in response to Interrogatory No. 19.

ANSWER:

To date, Defendant has been unable to identify any documents which would provide it with information regarding the companies from whom raw asbestos was purchased. As to Koppers and the roofing felts, see response to interrogatory #21. As to Universal and the hot tops, North American Asbestos, McCann Shields in Pittsburgh, Carey Canada, and perhaps J.M., and as to the lizardite which may have contained asbestos, Hedman Mines. Defendant will continue its investigation and will supplement this Interrogatory if and when any additional information is discovered.

INTERROGATORY NO. 26:

Is Defendant or any related company, as of the date of answering these interrogatories, still manufacturing, specifying, selling, distributing, applying or installing any asbestos-containing product? If so, give the brand/trade names of such products, type and percentage of asbestos in such product, and the date on which Defendant or any related company first manufactured, specified, sold, distributed, applied or installed said products.

ANSWER:

No.

INTERROGATORY NO. 27:

With respect to each and every product listed in response to Interrogatory No. 19, provide a full and complete description of the package in which the product was sold, including, but not limited to, type of package, size, color and writings thereon.

ANSWER:

Koppers' Roofing felts were sold in rolls with a paper wrapper around the roll and the labels are produced. In addition, see the Sweets Manuals which have been produced for a description of packaging. With respect to Universal Refractories, the hot top materials were shipped on palettes and wrapped with "shrink wrap." A label was placed on the shrink wrap identifying Universal as the manufacturer. There was a ladle hanging from a crane and the word UNRECO. For further descriptions of the Universal products, see the depositions of Sylvester, Frederick and Davidson. As to the E and C division of Koppers, see response 22.

INTERROGATORY NO. 28:

For each subpart below, state whether or not, to Defendant's knowledge, any items as described therein presently exist and, if so, identify any and all such existing items and state the present location of each:

- (a) any product listed in response to Interrogatory No. 19, including, but not limited to, any sample, part or piece thereof;
- (b) any package of the type in which any or all of the products listed in response to Interrogatory No. 19 were or would have been sold, including, but not limited to, any partial package;
- (c) any catalogue, brochure, sales literature or like item referring to, relating to or reflecting any or all of the products listed in response to Interrogatory No. 19;
- (d) any picture, drawing, photograph or like representation of the items described in subparts (a), (b) and/or (c) of this Interrogatory.

ANSWER:

(a) Defendant is not able to provide any samples or parts or pieces thereof of any product identified in Interrogatory No. 19; (b) As to the roofing products, see attached copies of labels; (c) see attached Sweets catalogs for roofing materials and attached copies of Universal Refractory brochures; (d) see (c).

INTERROGATORY NO. 29:

Did Defendant, any related company or any predecessor ever stamp or otherwise place (including affixing tags or labels) a company name, initials, or any identifying logo on any of the products listed in response to Interrogatory No. 19?

ANSWER:

As to the Beazer roofing products, see the labels which are produced, and see the Sweets catalogs to the extent they contain photographs of the packaging. As to Universal and the hot tops, see the depositions of Sylvester, Frederick and Davidson.

INTERROGATORY NO. 30:

If your answer to Interrogatory No. 29 is "Yes," identify each and every such product upon which such name, initials or identifying logo appeared and for each such product identified:

- (a) Describe each and every name, initials or identifying logo appearing on said product, at any time, by stating the wording, lettering, symbols, size, color and manner in which it was stamped, placed or affixed to said product;
- (b) State the date(s) during which each such name, initials, or identifying logo appeared on said product; and
- (c) Identify any and all documents referring to, relating to or reflecting the stamping, placing or affixing of names, initials or logos to said product, including, but not limited to, any pictures, photographs or like representations of such names, initials or logos

ANSWER:

See answer 29.

INTERROGATORY NO. 31:

Was each of the asbestos-containing products listed in response to Interrogatory No. 19 generally expected to reach, or was each packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Yes.

INTERROGATORY NO. 32:

If your answer to Interrogatory No. 31 is "No" with respect to any product(s), explain in what manner Defendant claims said product(s) were altered or substantially changed after sale or distribution and before reaching the consumer or user.

ANSWER:

Not applicable.

INTERROGATORY NO. 33:

With respect to each product listed in response to Interrogatory No. 19, state whether, based upon the material contents, the method of manufacturing, and the method of application, such product could generally be applied or installed without liberating asbestos fibers?

ANSWER:

Yes.

INTERROGATORY NO. 34:

With respect to each product listed in response to original Interrogatory number 19, could it be expected or anticipated that the product might have to be removed, stripped or replaced at any time after application or installation?

ANSWER:

Yes.

INTERROGATORY NO. 35:

Identify each person who participated in the design and/or preparation of manufacturing specifications for each product listed in response to Interrogatory No. 19.

ANSWER:

As of this time, defendant has been unable to determine who participated in the design and/or preparation of manufacturing specifications for roofing products. As to the hot tops, the deposition testimony of Universal employees, Sylvester, Davidson and Frederick describes the Universal employees involved in developing hot top products.

INTERROGATORY NO. 36:

Identify any and all documents, including, but not limited to, written memoranda, specifications, blueprints, formulas, patterns and designs, referring to, relating to or reflecting the design, preparation, application and/or installation of each product listed in response to Interrogatory No. 19.

ANSWER:

Defendant has been unable to locate any such documents except those listed in this interrogatory. As to the roofing products, the Sweets Manuals would contain information regarding the application or installation of the product. In addition, the information regarding aluminum roof coating 435 contains information regarding installation. As to the Universal hot top products, defendant is attempting to locate the document referred to in the deposition of Edwin Davidson taken July 21, 1994, which is referred to as a legendry for a 31" x 35" x 88" ingot mold. In addition, see the Universal hot top brochures.

INTERROGATORY NO. 37:

With respect to each product listed in response to Interrogatory No. 19, state:

- (a) The type of asbestos contained in the product as it was first manufactured;

- (b) The percentage of asbestos contained in the product as it was first manufactured;
- (c) Any modification to the product which altered the percentage or type of asbestos in the product and the dates of such modification;
- (d) The source of asbestos in each product;
- (e) The color, physical characteristics, and appearance of each product;
- (f) Any and all other names under which the product was sold, at any time;
- (g) The number and date of each patent or patent application for each product;
- (h) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person(s) who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (i) If the product is no longer produced, all reasons it was discontinued, the identity of the person(s) who made the decision to discontinue the product, the brand name of the replacement product, and the date the replacement product first went into production; and
- (j) The reasons why asbestos was used as an ingredient in each such product.

ANSWER:

With respect to roofing felts as follows: (a-e) felts were purchased from either Carey, Celotex, GAF or Nicolette, and this Defendant does not know the percentage of asbestos contained in the asbestos felt or the type. As to other roofing products see a document entitled Asbestos containing Roofing Products which contains percentages of asbestos. The asbestos felt was coated with either tar or asphalt resulting in a dark brown to black color to the felt.; (f) See the labels which are produced.; (g) None.; (h and i) Roofing felts without asbestos were manufactured and sold during the same period of time from the time of acquisition of Addex to a time between 1984 and 1986. Asbestos felts comprised a small portion of the sales and were sold by special order. There were discussions involving Drew Bachman, Ken Brozowski and others who are unidentified at this time who generally became aware of the health concerns involving asbestos, and it was decided to stop selling asbestos felts between 1984 and 1986. They were eliminated from the catalog in 1981. Further information is contained in the depositions which are produced.; (j) Unable to determine at this time, but investigation continues, but Jill Blundon stated that if a customer wanted asbestos felts they would specify so.

As to roof coatings, liquid asphalt and other products referred to on the list which is produced as follows: (a, b, c and d) Unknown; (e) aluminum or black; (f) see the Sweets Catalogs and Roofing Product Listing; (g) none; (h) for financial reasons, but it is unknown

who made the decision or if the decision making process was between 1984 and 1986; (i) see the commercial roofing announcement dated 1/10/86 signed by James Weideman which is produced in the category of EPA documents and EPA/roofing related information; (j) Unable to determine at this time, but investigation continues.

As to hot top products, (a) chrysotile at first and then a mixture of chrysotile and amosite with more amosite being used than chrysotile in the mix; (b) the side board was 11% asbestos and the ring, 18 to 20% asbestos; (c) none; (d) North American Asbestos and McCann Shields; (e) gray and tan; (f) see the hot top brochures and the depositions of Regis Frederick, Walter Sylvester and Ed Davidson; (g) see the depositions of Regis Frederick, Ed Davidson and Walter Sylvester; (h) see the depositions of Regis Frederick, Ed Davidson and Walter Sylvester; (i) see the depositions of Regis Frederick, Ed Davidson and Walter Sylvester; (j) see the depositions of Regis Frederick, Ed Davidson and Walter Sylvester.

INTERROGATORY NO. 38:

Identify any and all facilities at which Defendant, any predecessor or any related company, at any time, manufactured or processed asbestos-containing products, or processed raw asbestos.

For each such facility identified:

- (a) State the date(s) which said facility was owned and/or operated by Defendant, any predecessor or any related company;
- (b) State the date(s) during which asbestos-containing products and/or raw asbestos were manufactured or processed, at said facility; and,
- (c) Identify each person serving as the manager or supervisor of said facility during any time which the facility has been owned and/or operated by Defendant, any predecessor or any related company, and state the date(s) of the tenure as manager or supervisor for each.

ANSWER:

With respect to Universal Refractories, manufacturing was conducted in Wampum, Pennsylvania and Greenville, Pennsylvania, and Oak Creek, Wisconsin. Defendant, Beazer East, Inc., never owned the operating facilities of Universal Refractories. Universal Refractories manufactured asbestos-containing products during the years 1969 to probably January 1976 at the latest, when it was a wholly owned subsidiary of Thiem Corporation. Walter Sylvester was the general manager of Universal Refractories Corporation while it was a wholly owned subsidiary of Thiem Corporation and manufactured asbestos-containing products. Hedmanite may or may not have contained asbestos when it was used from 1975 to 1979.

With respect to roofing products, manufacturing was conducted at Youngstown, Ohio; Cicero, Illinois; Woodward, Alabama; and Wickliffe, Ohio between 1964 and 1987. Charles Kraynik was plant manager at Youngstown, Ohio, when it closed. Jerry Morris was at Woodward. Investigation continues as to the others.

INTERROGATORY NO. 39:

Identify any and all entities to which the defendant, any predecessor or related company, sold, distributed or otherwise provided any type of asbestos-containing product, including but not limited to, the products listed in response to original Interrogatory number 19, and which the defendant has any reason whatsoever to suspect, believe, think or otherwise conclude that said asbestos-containing product was installed, applied, stored, or anyway made use of at any site listed in Exhibit "A", at any site located in Madison County, Illinois, or at any site within a 200 mile radius of Madison County, Illinois.

ANSWER:

This defendant is unaware of any category or any lists which would give such information. If individual plaintiffs provide job site information on Exhibit A and products on Exhibit B, Defendant will make a good faith effort to identify whether it sold products identified in Interrogatories 19 and 42 to said employer or job site identified.

INTERROGATORY NO. 40:

Identify any and all persons known by you to have any knowledge concerning the manufacture, sale, distribution, possession, application, installation or use of the products listed in response to Interrogatory No. 19.

ANSWER:

This interrogatory is overly broad and could encompass any individuals in the plants where the products were made and, notwithstanding the objection, Koppers has identified and located the following. As to the roofing division materials of Koppers the following: Drew Bachman, Andrew Noble, Swen Swenson, Frank Moore, Joe Nusbaum, Tom Isaj, Jim Weideman, Mary Dombrowski Wright and other identified in the documents produced by this defendant. As to the E & C Division, it would

depend upon the facility being constructed and the time of construction. As to Universal Refractories: Walter Sylvester, Regis Frederick, Edwin Davidson and numerous others identified in the depositions of Sylvester, Davidson and Frederick.

INTERROGATORY NO. 41:

Has Defendant, any predecessor or any related company, at any time, designed, manufactured, processed, sold, distributed, supplied, applied, installed or contracted to apply or install any product which contained vermiculite?

ANSWER:

To the best of Defendant's knowledge, information and belief, no.

INTERROGATORY NO. 42:

If your answer to Interrogatory No. 41 is "Yes," identify by brand/trade name any and all such products which contained vermiculite and for each:

- (a) State the date(s) during which said product contained vermiculite;
- (b) State, in percentage terms, the amount of vermiculite contained in the product;
- (c) Identify the source of the vermiculite used in the product;
- (d) Identify the specific company (Defendant, predecessor, related company) which designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (e) State the year in which Defendant, its related company or its predecessor first designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (f) State the year in which the Defendant, its related company or predecessor last designed, manufactured, processed, sold, distributed, applied, installed or patented such product;
- (g) State whether any sample, part or piece of such product is still in existence; and
- (h) Identify all documents relating to such product, including but not limited to any package, brochure, catalog, picture, photograph or like representation of the product or packaging.

ANSWER:

Not applicable.

INTERROGATORY NO. 43:

With respect to the products listed in response to Interrogatory Nos. 19 and 42, did Defendant, any predecessor or related company or the manufacturer of the products ever conduct tests of any kind on any or all of said products concerning possible or potential health hazards involved in its use or in the use of materials contained therein?

ANSWER:

With respect to interrogatory #42, this is not applicable. With respect to the products listed in 19 and limiting response to tests regarding asbestos, as to the roofing products any asbestos would have been encapsulated and the answer is no. Furthermore, with respect to the roofing division, the United States EPA and OSHA exempted asbestos-containing roofing products from regulation because the asbestos incorporated into such products was completely encapsulated and the potential for the release of friable asbestos did not exist. Thus, Defendant did not conduct any such tests. With respect to Universal Refractories products, Beazer East, Inc. did not have an interest in Thiem Corporation when Thiem's wholly owned subsidiary, Universal Refractories, was aware it manufactured asbestos-containing products. Thus, no such testing could have been conducted by the Defendant.

INTERROGATORY NO. 44:

If your answer to Interrogatory No. 43 is "Yes," with respect to each product test:

- (a) State the location where the test was performed;
- (b) Identify each and every individual who conducted or participated in said test;
- (c) Describe the results of said test;
- (d) State the date or dates upon which said test was conducted;
- (e) Identify any and all documents referring to, relating to or reflecting said test or the results thereof; and
- (f) Identify each and every individual who received a copy of any document referring to, relating to or reflecting the results of said test.

ANSWER:

See Interrogatory No. 43.

INTERROGATORY NO. 45:

Did any person, including but not limited to, an officer, agent or employee of Defendant, any predecessor or related company recommend any design changes as a result of any test referenced in your response to the preceding interrogatory?

ANSWER:

Because no such tests were conducted, this Interrogatory is not applicable to this Defendant.

INTERROGATORY NO. 46:

If your answer to Interrogatory No. 45 is "Yes," with respect to each such recommended design change:

- (a) State the product or products involved;
- (b) State the test or tests involved;
- (c) State the nature of the change recommended;
- (d) Identify the person(s) making the recommendation;
- (e) State the nature and effective date of any change made; and
- (f) Identify each and every person who participated in the decision to make or not make the recommended design change.

ANSWER:

Not applicable.

INTERROGATORY NO. 47:

Identify any and all persons employed by Defendant, its predecessor or related company at any time from 1940 to date as an industrial hygienist or in a similar position.

ANSWER:

Charles Flickinger, who is no longer employed by this defendant; David Williams, who is no longer employed by this defendant.

INTERROGATORY NO. 48:

Identify any and all persons or entities, other than the employees listed above, which provided industrial hygienic or similar services or information to, or for the benefit of, this Defendant, at any time from 1940 to date, including, but not limited to, employees of, or anyone retained by, any predecessor or related company.

ANSWER:

Dr. Anna Baetjer who is deceased.

INTERROGATORY NO. 49:

Does Defendant have, or has Defendant, any predecessor or any related company ever had, a Research Department? If so:

- (a) State when such department was established, and whether or not such department has operated continuously since being established;
- (b) State how much Defendant, its predecessor and/or related company expended each year on research; and
- (c) State the percentage of said expenditure which was for research concerning the health affects of asbestos;
- (d) Identify the person(s) in charge of such department throughout its existence; and
- (e) Identify the person(s) in charge of any asbestos-related research conducted by such department throughout the years.

ANSWER:

Yes. Defendant has been unable to determine, based upon the documents available to it, information to respond to Interrogatory No. 49. Defendant will continue its investigation in this regard and will supplement this Interrogatory upon the discovery, if any, of additional information. This defendant produces the subscriptions listing

from the Monroeville library which contains information about a research department.

INTERROGATORY NO. 50:

Did Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so:

- (a) State the dates such library existed;
- (b) State the number of volumes maintained therein;
- (c) State the number of employees, part-time or full-time, assigned to the maintenance of said library; and
- (d) Identify the person(s) within the corporate structure to whom said library employees reported throughout the existence of the library.

ANSWER:

Based upon the documents available to it, defendant has been unable to determine whether there was a library for the medical department or any industrial hygiene division thereof, however, this defendant responds as follows: (a) It is uncertain when any such library began, but it was dismantled in 1989; (b) unknown, but see the subscriptions listing from the Monroeville Library for information on the library; (c) see the deposition of Elizabeth Lyle where she states at one point and time 6 employees; (d) Eugene Meckley at some point in time as further described in the depositions of Elizabeth Lyle.

INTERROGATORY NO. 51:

Identify any and all scientific or medical periodicals to which Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, subscribed from 1940 to the present, and for each periodical state the dates of such subscriptions.

ANSWER:

See answer 50.

INTERROGATORY NO. 52:

Has Defendant, any predecessor or any related company, at any time since 1940:

- (a) been a member of a medical and/or scientific library or library association?
- (b) been a member of any organization or association which maintained a medical and/or scientific library?
- (c) been a member of any organization or association through which members obtained the use of, or access to, a medical and/or scientific library?

ANSWER:

Defendant refers plaintiff to the 1953 memberships and representatives listing and subscription listing from Monroeville Library which it has produced. This defendant does not know the extent to which any of these organizations are considered medical, scientific or library associations or to the extent which those organizations maintained libraries.

INTERROGATORY NO. 53:

If your answer to any subpart of Interrogatory No. 52 is "Yes" :

- (a) Identify the library(ies) involved and state the years during which Defendant, its predecessor or related company was a member of, or otherwise had use of or access to said library; and
- (b) If applicable, identify the organization or association through which Defendant, its predecessor or related company, obtained the use of or access to, such library(ies).

ANSWER:

See answer 52.

INTERROGATORY NO. 54:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to, any insurance company, at any time, conducted any industrial hygiene surveys concerning any product identified in response to Interrogatory No. 19, including, but not limited to, surveys concerning the manufacture, processing, application,

installation, use and/or removal of said products?

ANSWER:

Universal Refractories was not aware it manufactured an asbestos-containing product during the years that Koppers Company, Inc. had an interest in Thiem Corporation. Therefore, no such surveys could have been conducted by this Defendant. With respect to the roofing division, the Defendant is unaware of any such surveys being conducted. As to Thiem, see the depositions of Sylvester, Frederick & Davidson. Also, see deposition of Regis Frederick wherein he testified that at some point after the Koppers acquisition of Thiem there was some monitoring conducted by Koppers personnel from Monroeville. As to the roofing division, see the 1997 deposition of Charlie Flickinger wherein he testified that some testing was done inside one of the plants. No such documents have been located regarding any testing so it is unknown whether this information is responsive to this interrogatory. Investigation continues.

INTERROGATORY NO. 55:

If your answer to Interrogatory No. 54 is "Yes," with respect to each such survey:

- (a) Identify the product(s) which was used in the survey;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said survey;
- (c) State the date(s) of said survey;
- (d) Describe the methodology, results and conclusions of said survey;
- (e) Identify any and all documents referring to, relating to, or reflecting said survey or the results and conclusions thereof; and,
- (f) Identify any and all persons to whom such document may have been sent.

ANSWER:

Not applicable.

INTERROGATORY NO. 56:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, including but not limited to any insurance company, at any time, gone into any area where any product identified in response to Interrogatory Nos. 19 and 42 was being manufactured,

used, applied or installed to perform a dust level count or similar test?

ANSWER:

This defendant has been unable to locate any such documents and does not have information at this time.

INTERROGATORY NO. 57:

If your answer to Interrogatory No. 56 is "Yes," identify each such count or test performed, by stating when and where it was conducted, and with respect to each count or test so identified:

- (a) Identify the product being manufactured, used, applied or installed;
- (b) Identify each and every person who conducted, participated in conducting, or analyzed the results of, said count or test;
- (c) State the purpose of said count or test;
- (d) State what, if any, actions were taken in response to the results of said count or test; and
- (e) Identify any and all documents referring to, relating to or reflecting said count or test, including, but not limited to, any actions taken in response to the results of such count or test.

ANSWER:

Not applicable.

INTERROGATORY NO. 58:

Has Defendant, any predecessor or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies), of any kind, concerning the effects of the inhalation of asbestos dust or asbestos fibers on one using or being exposed to asbestos or any asbestos-containing product, including, but not limited to, those identified in response to Interrogatory Nos. 19 and 42?

ANSWER:

See Interrogatory No. 54.

INTERROGATORY NO. 59:

If your answer to Interrogatory No. 58 is "Yes," with respect to each such study:

- (a) Describe the nature of said study, including, but not limited to, the purpose and objectives of the study, the product(s) involved, the date(s) conducted, the methodology employed and the results reached, both raw data and conclusions;
- (b) Identify any and all entities and/or persons conducting said study or participating in the conducting of said study;
- (c) Identify any and all documents referring to, relating to or reflecting said study, including but not limited to reports (both interim and final), notes, memoranda, work papers, data compilations and surveys;
- (d) Identify any and all directors, officers, agents or employees of Defendant who participated in the decision to have the study conducted; and,
- (e) Identify any and all entities and/or persons who received a copy of any document referring to, relating to or reflecting the results or conclusions reached.

ANSWER:

Not applicable.

INTERROGATORY NO. 60:

Did Defendant, its predecessor or related company, take any action as a result of any study or studies set forth in response to Interrogatory Nos. 56 and 58? If so, identify each and every study which resulted in some action being taken, and:

- (a) Describe the actions taken, including the effective date of said actions;
- (b) Identify any and all persons, including, but not limited to, directors, officers, agents and employees of Defendant who participated in the decision to undertake said actions; and
- (c) Identify any and all documents referring to, relating to or reflecting said actions, or any subsequent modification or discussion of the same.

ANSWER:

Not applicable.

INTERROGATORY NO. 61:

Has Defendant, any predecessor, or any related company, or any person or entity acting on behalf thereof, at any time, conducted any study(ies) designed to minimize or eliminate the inhalation of asbestos dust and fibers by those using, handling or exposed to any product listed in response to Interrogatory Nos. 19 and 42?

ANSWER:

Universal Refractories manufactured asbestos-containing products while it was a wholly owned subsidiary of Thiem Corporation, during years when this Defendant had no interest in Thiem Corporation. Thus, no such studies could have been conducted by this Defendant. In addition, see answer 54. With respect to the roofing division products of Koppers Company, Inc., because the U.S. EPA and OSHA exempted asbestos-containing roofing products from regulation because of the belief that the asbestos was completely encapsulated and not susceptible to the release of friable asbestos, no such studies were conducted.

INTERROGATORY NO. 62:

If your answer to Interrogatory No. 61 is "Yes," with respect to each such study:

- (a) Identify the product involved;
- (b) Identify the person(s) and/or entity(ies) conducting said study;
- (c) State the date said study began and the date on which it was completed;
- (d) Identify any and all persons, including, but not limited to, directors, officers, agents or employees of Defendant, who participated in the decision to have said study conducted;
- (e) Describe the nature of said study;
- (f) Describe the nature of any action to eliminate or minimize inhalation of asbestos dust or asbestos fibers undertaken as a result of said study;

- (g) Identify any and all documents referring to, relating to or reflecting said study or the results thereof; and,
- (h) Identify any and all persons receiving a copy of any document referring to, relating to or reflecting the results or conclusions of said study.

ANSWER:

Not applicable.

INTERROGATORY NO. 63:

Did Defendant, any related company, or any predecessor at any time, give to persons, who would be applying and/or removing any of the products listed in response to Interrogatory Nos. 19 and 42, any instructions or guidelines concerning precautions, warnings, procedures, and/or methods to use, in order to safely apply or remove such products? If so, describe such instructions, state to whom they were given, state the dates they were given, and describe the manner in which they were given.

ANSWER:

Please see attached labels from Koppers Company's roofing division. In addition, see the Sweets Manuals, which is the product catalog in the 1980, 1981 and 1982 manuals which contain the following warning regarding Exeltherm II Roof Insulation. The warning stated:

Warning:

The facers of this product contain asphalt saturated asbestos fiber. The Occupational Safety and Health Administration (OSHA), an agency of the United States government, believes that repeated inhalation of asbestos fiber is a health hazard and may cause various diseases including asbestosis and cancer.

This Defendant is unaware of any warnings being placed on Universal Refractories asbestos-containing products manufactured at a time when this Defendant did not have an interest in Thiem Corporation or at any time thereafter.

INTERROGATORY NO. 64:

Did Defendant, any predecessor or any related company, at any time, place any warning signs or labels on the containers in which any of the products listed in response to Interrogatory Nos. 19 and 42 were packaged?

ANSWER:

No as to the roofing division. Please see attached labels from Koppers Company's roofing division. This Defendant is unaware of any warnings being placed on Universal Refractories asbestos-containing products manufactured at a time when this Defendant did not have an interest in Thiem Corporation or at any time thereafter.

INTERROGATORY NO. 65:

If your answer to Interrogatory No. 64 is "Yes," identify each and every product upon which such a warning was placed, and with respect to each such product identified:

- (a) State the date on which any order directing that a warning be placed on said product first issued;
- (b) Identify any and all persons participating in the decision to issue that order;
- (c) State the first date on which such warning was actually placed on said product;
- (d) State the first date on which such product accompanied by such warning was first sold, distributed or installed;
- (e) State the exact wording of this first warning;
- (f) State the exact location and size of this first warning as it appeared on said product;
- (g) Identify any and all persons who participated in any phase of the drafting or design of said first warning, including, but not limited to, those who performed the actual drafting and design work, those who reviewed the work, those who edited the work and those who approved the warning;
- (h) State why you placed such warning on said product, including, but not limited to, whether you placed such warning on said product because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee,

association, attorney or institute; and

- (i) Identify any and all documents referring to, relating to or reflecting, said warning, its drafting, and/or the decision to place the warning on said product, including, but not limited to, any communication as described in subpart (h) of this Interrogatory.

ANSWER:

Not applicable.

INTERROGATORY NO. 66:

With respect to each product identified in response to Interrogatory No. 65 as having been accompanied by a warning, state whether, subsequent to the first warning described above, any different warning was ever placed upon said product. Any alteration, change or modification in the language, wording, capitalization, punctuation, style of type or printing, size, color, or location on the package or container, of the warning constitutes a different warning.

ANSWER:

Not applicable.

INTERROGATORY NO. 67:

With respect to each different warning which accompanied each product listed in response to Interrogatory No. 65:

- (a) State the date on which any order directing that such different warning be placed on said product first issued;
- (b) Identify any and all persons participating in the decision to issue that order;
- (c) State the first date on which such different warning was actually placed on said product;
- (d) State the first date on which such product accompanied by such different warning was sold, distributed or installed;
- (e) Describe, with specificity, any and all changes, modifications or differences between the different warning and the prior warnings(s);

- (f) Identify any and all persons who participated in any phase of the drafting or design of such different warning, including, but not limited to, those who performed the actual drafting and design work, those who reviewed the work, those who edited the work and those who approved the different warning;
- (g) State why you placed such different warning on said product, including, but not limited to, whether you placed such different warning on said product because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute; and
- (h) Identify any and all documents referring to, relating to or reflecting, said different warning, its drafting, and/or the decision to place the different warning on said product.

ANSWER:

Not applicable.

INTERROGATORY NO. 68:

Prior to the date on which Defendant first directed that a warning accompany any product identified in response to Interrogatory Nos. 19 and 42, did any person, firm, organization or other entity, within or without your employ, suggest, recommend, counsel, advise, or otherwise indicate in any manner, that a warning should accompany any or all such products or asbestos-containing products generally?

ANSWER:

Not applicable.

INTERROGATORY NO. 69:

If your answer to Interrogatory No. 68 is "Yes," with respect to each such suggestion, recommendation, counseling, advice or other indication:

- (a) Identify the person(s) and/or entity(ies) giving the same;
- (b) State the date(s) on which the same was given;

- (c) Identify any and all persons receiving notice of the same;
- (d) Describe what, if any, action Defendant took in response to or upon the same; and,
- (e) Identify any and all documents referring to, relating to or reflecting the same, or any action taken thereon or in response thereto.

ANSWER:

Not applicable.

INTERROGATORY NO. 70:

Did Defendant, any predecessor, or any related company ever place any warning directly upon any of the products listed in response to Interrogatory Nos. 19 and 42?

ANSWER:

See answer 64. To the best of the Defendant's knowledge, information and belief, no markings of any type were placed on Beazer's products. This Defendant did not have an interest in Thiem Corporation when its subsidiary, Universal Refractories, was aware it manufactured asbestos-containing products. Based upon documents provided to it, Defendant does not believe that any stamp of any type was placed directly on the products.

INTERROGATORY NO. 71:

If your answer to Interrogatory No. 70 is "Yes," identify each and every product upon which such a warning was placed and for each such product identified:

- (a) State, verbatim, each and every warning which ever appeared on said product;
- (b) State the size, color and location of each such warning and describe the manner in which it was placed upon the product;
- (c) State the dates on which each such warning first and last appeared in said product; and,
- (d) Identify any and all documents referring to, relating to or reflecting the placing of any warning directly upon said products, including, but not limited to, decisions not to place such a warning.

ANSWER:

Not applicable.

INTERROGATORY NO. 72:

Did any warning of any type concerning the products listed in response to Interrogatory Nos. 19 and 42 ever appear in any sales literature or other materials distributed or provided by Defendant, any predecessor or any related company, to the purchasers, consumers and/or users of such products?

ANSWER:

See sales brochures for roofing products and MSDS sheet for aluminum roof coatings. Investigation continues.

INTERROGATORY NO. 73:

If your answer to Interrogatory No. 72 is "Yes," identify each and every item of sales literature or other materials in which such a warning appeared, and for each item so identified:

- (a) State the date on which said item was first provided to distributors, sellers, purchasers, consumers or users;
- (b) List the products discussed in the literature;
- (c) Identify any and all other sales literature concerning the products listed in response to Interrogatory Nos. 19 and 42 which was provided to distributors, sellers, purchasers, consumers or users after the above date and which contained no warning.

ANSWER:

See sales brochures for roofing products and MSDS sheet for aluminum roof coatings. Investigation continues..

INTERROGATORY NO. 74:

Does Defendant or any related company have any of the following in its possession, custody or control:

- (a) any package, container, label or item of sales literature which Defendant claims constitutes or contains any warning which ever accompanies any product listed in

response to Interrogatory Nos. 19 and 42?

- (b) any picture, photograph or like reproductive representation of any item described in subpart (a)?

ANSWER:

See attached labels and sales brochures for roofing products.

INTERROGATORY NO. 75:

State the year that Defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust, promulgated by the American Conference of Governmental Industrial Hygienists, and identify the specific person(s) receiving such advise, and any and all documents communicating such advise.

ANSWER:

Based upon records available to it, the Defendant is unable to determine exactly when it became advised of threshold limit values or maximum allowable concentrations or the person who was first so advised. However, Defendant believes that it became generally advised when such information was published to the public.

INTERROGATORY NO. 76:

State whether such threshold limit values or maximum allowable concentrations referred to in Interrogatory No. 75 involved TOTAL dust or just asbestos dust?

ANSWER:

Threshold limit values were not applied to Koppers Roofing products when it manufactured asbestos-containing roofing products. Thus, Defendant is unable to respond to Interrogatory No. 76 as it does not apply to Defendant's products. Because Defendant, Beazer East, Inc., had no interest in Thiem Corporation when its wholly owned subsidiary, Universal Refractories Corporation, was aware it manufactured asbestos-containing products, this Defendant is unable to respond to Interrogatory No. 76 as it related to Universal Refractories' products.

INTERROGATORY NO. 77:

Describe, in detail, any and all tests, if any, conducted by Defendant, any predecessor or any related company, or anyone acting on behalf thereof, concerning the quantity, quality or threshold limit values of asbestos dust or particles to which applicators or consumers of asbestos-containing products were exposed while using any product identified in response to Interrogatory Nos. 19 and 42, including:

- (a) The product being used;
- (b) Identify any and all person(s), firm(s) or entity(ies) conducting or participating in the conducting of said test;
- (c) State the date(s) of said test;
- (d) Describe the methodology, results and conclusions of said test;
- (e) Identify any and all documents referring to, relating or reflecting said test or the results and conclusions thereof; and,
- (f) Identify any and all persons to whom any document referring to, relating to or reflecting the results or conclusions of said test was sent.

ANSWER:

Because the United States EPA and OSHA exempted asbestos-containing roofing products from TLV's, Koppers Company did not conduct such tests. With respect to Universal Refractories, it thought it had discontinued the manufacture of asbestos-containing products when the stock of Thiem Corporation was purchased by the Defendant.

INTERROGATORY NO. 78:

Did Defendant, any predecessor or any related company, at any time, directly advise the owners or management employees of any work site in which it sold or applied any product listed in response to Interrogatory Nos. 19 and 42, of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienist? If so, state the

date or dates that you so advised each such owner or employees, the manner in which you advised such owner or employee and the name of each such owner or employee.

ANSWER:

Because the U.S. EPA and OSHA exempted asbestos-containing roofing products from threshold limit values for exposure to asbestos dust, no such advise was required of Koppers Company, Inc. With respect to Universal Refractories, this Defendant had no interest in Thiem Corporation when Universal Refractories was aware it manufactured asbestos-containing products.

INTERROGATORY NO. 79:

State the date on which any official of Defendant or its predecessor(s) first had knowledge, notice, information or understanding that exposure to asbestos would, could or might cause each of the following diseases:

- (a) Pleural disease;
- (b) Asbestosis;
- (c) Mesothelioma;
- (d) Lung cancer;
- (e) Any other forms of cancer.

ANSWER:

Defendant objects to this Interrogatory as calling for a medical opinion. Without waiving such objection, Defendant is unaware of any documents or other information containing the exact date upon which it became aware that certain levels of exposure in certain workers can cause the development of certain diseases. However, Defendant believes that it became generally aware in the 1970's when the public became generally aware that certain high level exposures to asbestos could cause various diseases in certain workers. See the documents produced for additional information.

INTERROGATORY NO. 80:

With respect to each disease set forth in Interrogatory No. 79:

- (a) Identify the official who first obtained the knowledge, notice, information or understanding to which the interrogatory refers;

- (b) Identify any and all documents referring to, relating to or reflecting such knowledge, notice, information or understanding; and,
- (c) Describe what, if any, action said official, Defendant, any predecessor or any related company took in response to such knowledge, notice, information or understanding.

ANSWER:

See Interrogatory No. 79.

INTERROGATORY NO. 81:

Is Defendant aware, or does Defendant possess knowledge or information concerning, a causal connection between exposure to asbestos or asbestos-containing products and:

- (a) pleural disease?
- (b) asbestosis?
- (c) lung cancer?
- (d) mesothelioma?
- (e) other cancer?

ANSWER:

See Interrogatory No. 79.

INTERROGATORY NO. 82:

For each subpart of Interrogatory No. 81 to which you answered "Yes":

- (a) Describe when and how Defendant first obtained knowledge, or information concerning such connection;
- (b) If such knowledge or information was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting, any and all persons attending, and any and all documents referring to, relating to or reflecting the meeting;
- (c) If knowledge was obtained from medical or scientific studies, or work, published or unpublished, identify the same.

ANSWER:

See Interrogatory No. 79.

INTERROGATORY NO. 83:

With regard to any knowledge or information obtained subsequent to that identified in your answer to Interrogatory No. 82 (a), identify any and all documents or communications (oral and/or written) concerning the causal connection between exposure to asbestos-containing or asbestos products and any disease, which were sent to, or received by, Defendant, and identify any and all persons conveying and/or receiving such communications.

ANSWER:

See the documents produced.

INTERROGATORY NO. 84:

As to any knowledge or information referred to in Interrogatories 79-83, did Defendant, at any time, educate or inform its employees, distributors, purchasers or any persons working in the vicinity where any asbestos-containing product was being applied or installed as to the hazards known to Defendant or about which Defendant had information, and as to the safety precautions necessary to guard against cancer and other diseases arising from the use and handling of the products identified in response to Interrogatory No. 19?

ANSWER:

Defendant objects to this Interrogatory in that it assumes facts not in evidence. It assumes that there was a hazard known to the Defendant about which the Defendant had information connecting its asbestos-containing products to a hazard. On the contrary, Defendant believes and therefore avers that because the United States EPA and OSHA exempted asbestos-containing roofing products from regulation, Defendant had no such knowledge and no such hazard existed. This defendant did not have an interest in Thiem Corporation when its subsidiary, Universal Refractories, was aware it manufactured asbestos containing products and therefore even using this defendant had any obligation or duty regarding Universal or Thiem products the answer is no. As to the E & C Division, this defendant is unaware of any such information at this time.

INTERROGATORY NO. 85:

If your answer to Interrogatory No. 84 is "Yes," identify each such occasion on which Defendant so educated or informed its employees, distributors or purchasers, as follows:

- (a) Identify the persons or parties which you educated or informed;
- (b) State when, where and in what manner they were educated or informed;
- (c) Identify any and all documents referring to, relating to or reflecting the communication or other dissemination of such information; and
- (d) Identify any and all persons who so educated or informed said employees, distributors, purchasers or persons working in the vicinity of application or who participated in the same in any way, including, but not limited to, assembling, drafting, writing, rewriting, preparing or conveying such information in any format.

ANSWER:

Not applicable.

INTERROGATORY NO. 86:

Did Defendant or any predecessor entity perform, direct to be performed, finance in whole or in part, sponsor in whole or in part or receive the results of, any studies or tests concerning the relationship between asbestos exposure and asbestosis, cancer and/or mesothelioma?

ANSWER:

No.

INTERROGATORY NO. 87:

If your answer to Interrogatory No. 86 is "Yes," with respect to each such study or test:

- (a) State the nature of the involvement (performed, directed it to be performed, financed, sponsored, received results, etc.);
- (b) State when, where and at what intervals said study was performed;
- (c) Identify any and all persons, firms or entities which performed said study;

- (d) Identify any and all documents referring to, relating or reflecting said study or the results thereof; and
- (e) State all means by which the results of said study were disseminated including, if applicable, publication; and identify any and all persons who received said results and any and all publications in which said results appeared.

ANSWER:

Not applicable.

INTERROGATORY NO. 88:

Did Defendant at any time during the period that the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, sold, applied or installed, inform any purchaser or user of said products that such products could cause cancer, asbestosis, and/or other serious diseases?

ANSWER:

Defendant refers the plaintiff to the 1980 Sweets Manual on roofing products which contains the warning that reference to the Exeltherm II roof insulation that states "the occupational safety and health administration (OSHA) (an agency of the United States Government, believes that repeated inhalation of asbestos fiber is a health hazard and may cause various diseases including asbestosis and cancer". As to the E & C Division, this defendant is unaware of any such information. This defendant did not have an interest in Thiem Corporation when its subsidiary, Universal Refractories was aware it manufactured asbestos containing products and therefore the answer is no.

INTERROGATORY NO. 89:

Did Defendant, any predecessor or any related company, or any workers' compensation insurance carrier thereof, ever have any claims for lung diseases or death from lung disease, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or exposure to asbestos-containing products?

ANSWER:

Yes.

INTERROGATORY NO. 90:

If your answer to original Interrogatory number 89 was "yes", please provide the following information for each and every employee of the defendant, predecessor or related company with such a claim. If the claimant was a non-employee, please provide the information for the first 100 cases of which the defendant had notice.

- (a) Identify the claimant;
- (b) Identify the entity against which the claim was filed;
- (c) State the date upon which the claim was filed;
- (d) List the locations(s) at which claimant was exposed to asbestos;
- (e) Identify each and every board, administrative body, commission or court which handled or reviewed said claim and state the state the style and cause number applicable to said claim before each such body;
- (f) Identify the disease alleged by claimant;
- (g) State the final disposition of the claim including any and all benefits paid, and the entity making such payments;
- (h) If different from the date on which the claim was filed, state the date on which defendant first had notice of the claim; and
- (i) Identify any and all documents referring to, relating to or reflecting said claim.

ANSWER:

Defendant objects to the overly broad and burdensome nature of this request and states that it has no document or other information that would contain all of the information requested. But notwithstanding the objection, defendant states that it did not keep a chronological list of the earliest law suits or worker's compensation claims. As to the worker's compensation claims defendant refers plaintiff to the document in the materials entitled Internal Memo Regarding Worker Health and Safety Product Liability Claim which appears to indicate a workers compensation claim filed around 1984 by Joseph Vantoso. Investigation continues as to worker's compensation claims. Also in the materials produced it appears that the earliest claims were in the early 1980's. A memo in the documents entitled EPA Documents and EPA/Roofing Related Information from Mary Ann Marino dated July 23, 1980

references the case of Gardner v. Koppers. Memos in the file entitled Internal Memo Re: Worker Health and Safety Product Liability Claim dated February 25, 1985 seems to indicate litigation in Cleveland entitled Edward Vitu v. Armstrong Cork, et al., and another memo in that file dated January 3, 1985 indicates there may have been litigation involving Norfolk and Western. In addition, a letter from Koppers legal department to outside attorney, Robert Little, pertaining to a law suit entitled Sapp v. Universal Refractories seems to indicate the existence of litigation in 1981. This letter is further described in the privilege log. Investigation is continuing as to these law suits and as to other litigation that may have been pending in the 1980's. Depositions have been produced which give information on some of the law suits against Universal and Beazer East, Inc. Efforts are being made to obtain more information to the extent such information is available.

INTERROGATORY NO. 91:

How many past or present employees of Defendant, its predecessors or related companies are known by you to be suffering from, to have suffered from, or to have suffered deaths caused by:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?

ANSWER:

Based upon records available to it, the Defendant is unable to determine whether any of its employees or former employees allege suffering from diseases listed in Interrogatory No. 91.

INTERROGATORY NO. 92:

For each employee referenced in your answer to Interrogatory No. 91, state the date that Defendant first knew, or had notice or information, that such past or present employee was suffering, or had suffered from:

- (a) asbestosis;
- (b) lung cancer;
- (c) mesothelioma.

ANSWER:

Not applicable.

INTERROGATORY NO. 93:

Identify any and all material safety data sheets concerning the products listed in response to Interrogatory Nos. 19 and 42 prepared, at any time, by, or on behalf of, Defendant, any predecessor or any related company.

ANSWER:

As to the roofing products see attached the material safety data sheets. As to any Thiem or Universal products, defendant is unaware of any such MSDS sheets.

INTERROGATORY NO. 94:

Identify any and all trade organizations, associations, or other entities, including but not limited to American Textile Institute (ATI), Asbestos Information Association (AIA), Industrial Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which Defendant, any predecessor or any related company has belonged or in which any or all of the same have participated since 1925, and state the applicable dates of such membership or participation.

ANSWER:

See the documents entitled 1953 Memberships and Representatives for Koppers which provides the information available to this defendant at this time on this subject. In addition other documents produced might indicate other memberships to which Koppers or its employees belonged.

INTERROGATORY NO. 95:

Identify any and all persons attending, on behalf of Defendant, any predecessor or any related company, any meetings, seminars or symposiums held by the trade organizations, associations, or

other entities identified in response to Interrogatory No. 94.

ANSWER:

See the answer to 94.

INTERROGATORY NO 96:

Did any officer, employee, agent or representative of Defendant, of any predecessor, or of any related company, serve, at any time, as:

- (a) an officer, director or official of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (b) a member of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (c) the chair of any committee or subcommittee of any trade organization, association or entity identified in response to Interrogatory No. 94?
- (d) the representative or liaison for any trade organization, association or entity identified in response to Interrogatory No. 94 to any other trade organization, association or entity, including, but not limited to, A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., N.A.C., N.S.C., A.C.S., N.B.M.D.A., N.I.A., S.M.F.M.A.?

ANSWER:

Based upon records available to it, Defendant is unable to determine whether any of its officers, directors or employees was an officer, director or employee of a trade organization as outlined in Interrogatory No. 96, unless it is set forth in document referred to in interrogatory number 94.

INTERROGATORY NO. 97:

For each subpart of Interrogatory No. 96 to which your answer is "Yes," identify each and every person serving in such capacity and:

- (a) state the trade organization, association or entity for which such service was rendered;
- (b) specify the capacity of service, including identifying any specific committee, subcommittee or other trade organizations, associations or entities involved; and,

- (c) state the applicable dates of service.

ANSWER:

See Number 96.

INTERROGATORY NO. 98:

Identify any and all documents which Defendant, its predecessor(s) or any related company submitted to, or received from, the organizations listed in response to Interrogatory Nos. 94 and/or 97:

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; and/or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER:

Defendant is not in possession of any such documents therefore cannot identify any such documents, however, defendant refers plaintiff to the 1953 Membership list which is produced and the description listing to the extent that the information is contained herein.

INTERROGATORY NO. 99:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, created by, or on behalf of, any trade organization, association or entity listed in response to Interrogatory No. 94 and/or 97 or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER:

See response to Number 98.

INTERROGATORY NO. 100:

Identify any and all documents including, but not limited to, minutes, bulletins or reports, received by, or on behalf of, any trade organization, association or entity listed in response to Interrogatory No. 94 and/or 97, or any committee, subcommittee or subgroup thereof;

- (a) which refer to, relate to or reflect the subject of asbestos;
- (b) which refer to, relate to or reflect a relationship between asbestos exposure and any disease; or
- (c) which refer to, relate to or reflect the placement or providing of warnings with respect to hazardous products.

ANSWER:

See the response to Number 98.

INTERROGATORY NO. 101:

Identify any and all agreements, oral or written, between or among Defendant, any of the other defendants in this lawsuit, any organization, association or other entity including, but not limited to, those identified in your answer to Interrogatory No. 94 and/or any medical or scientific foundations, relating to the standardization of:

- (a) Specifications for asbestos cloth products;
- (b) Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos cement;
- (c) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (d) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public;

- (e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
- (f) Medical programs to be offered or sponsored by defendant.

ANSWER:

Defendant is unaware of any such agreements.

INTERROGATORY NO. 102:

Did Defendant, any predecessor or related company, direct to be performed, sponsor in whole or in part, finance in whole or in part, receive the results of, or become aware of, any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human health?

ANSWER:

No.

INTERROGATORY NO. 103:

If your answer to Interrogatory No. 102 is "Yes":

- (a) Identify any and all documents received by Defendant, its predecessor(s), or a related company referring to, relating to or reflecting any findings or results of those studies or tests, and state the date upon which each was first received;
- (b) Identify any and all communications (oral or written), between Defendant, its predecessor(s) or a related company and Saranac personnel, including but not limited to Gerrit W.H. Schepers, M.D.;
- (c) Identify any and all documents referring to, relating to or reflecting the Saranac studies received or submitted by Defendant, its predecessor(s) or a related company either directly, through related or predecessor companies, through other companies, or through any trade associations, organizations or other entities; and
- (d) Identify any and all documents referring to, relating to or reflecting recommendations or findings of such studies relating to:
 - (1) Adequacy or inadequacy of threshold limit values;

- (2) Substitution of materials other than asbestos to be used in the insulation process.

ANSWER:

Not applicable.

INTERROGATORY NO. 104:

With respect to each subject listed below, state whether said subject was, at any time, discussed at a meeting of the board of directors of Defendant, any predecessor or any related company:

- (a) The sale and/or marketing of any asbestos-containing product, including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42;
- (b) The health hazards resulting from exposure to asbestos, including, but not limited to, exposure resulting from the use, application or removal of asbestos-containing products;
- (c) The placement or possible placement of warning labels on asbestos-containing products or their packages, or in sales literature, therefore including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42; and
- (d) Any test, survey, study or similar matter concerning asbestos or asbestos-containing products, including, but not limited to, the products listed in response to Interrogatory Nos. 19 and 42.

ANSWER:

Based upon review of documents from the Board of Directors of the Defendant, no such discussions are reflected.

INTERROGATORY NO. 105

If your answer to any one or more of the subparts of Interrogatory No. 104 is "Yes," then with respect to each subpart for which you answered "Yes":

- (a) Identify each and every board meeting at which said subject was discussed by stating the date(s) on which, and the location(s) at which, each meeting was held;
- (b) Identify any and all persons present at each such meeting; and,

- (c) Identify any and all documents, including, but not limited to, minutes, referring to, relating to, or reflecting each such meeting.

ANSWER:

Not applicable.

INTERROGATORY NO. 106:

Identify any and all seminars, symposiums, conferences or like gatherings attended by any officer, agent or representative of Defendant, any predecessor or any related company, at which the subject of asbestos, the health hazards of asbestos exposure, or the placement or providing of warnings was discussed.

ANSWER:

This defendant has been unable to locate any such information at this time.

INTERROGATORY NO. 107:

Identify any and all documents, including, but not limited to, notes, reports, minutes or bulletins, which refer to, relate to or reflect any meeting identified in response to Interrogatory No. 106.

ANSWER:

This defendant has been unable to locate any such information at this time.

INTERROGATORY NO. 108:

With respect to each job site within 200 miles of Madison County and/or identified by any plaintiff (who has asserted claims against this defendant) (i) identify any and all documents referring to, relating to or reflecting the purchase, sale, delivery, use, application or ordering, of any of the products listed in response to Interrogatory Nos. 19 and 42 by, for, to or at said site; and, (ii) identify any and all persons known by Defendant to have knowledge concerning the same:

ANSWER:

To the extent that such documents exist, Defendant will produce documents at a mutually agreeable time. This defendant is unaware of any category or any lists which would give such information. If individual plaintiffs provide job site information on Exhibit A and products on Exhibit B, defendant will make a good faith effort to identify whether it sold products identified on Interrogatories 19 and 42 to said employer or job site identified.

INTERROGATORY NO. 109:

Identify any and all parties, located within a 200 mile radius of Madison County, Illinois, including, but not limited to, distributors, suppliers or contractors, known by you to have purchased, received, sold, distributed, applied or otherwise used, at any time, any or all of the products listed in response to Interrogatory Nos. 19 and 42.

ANSWER:

See interrogatory No. 108.

INTERROGATORY NO. 110:

Other than cases identified in Interrogatory numbers 89 and 90, has defendant, any predecessor or any related company, ever appeared as a party in any lawsuit involving a claim or claims based upon allegations of property damage or seeking recovery of the costs of abatement from the use, application, installation or presence of asbestos or asbestos-containing products?

ANSWER:

No.

INTERROGATORY NO. 111:

If your answer to Interrogatory No. 110 is "Yes," identify each such lawsuit as follows:

- (a) Identify the plaintiff(s);
- (b) Identify all other defendants;

- (c) State when and where the case was filed;
- (d) Identify each court in which the case was heard or is pending, including appeals, and state the style and cause number of the case in each court; and,
- (e) State the current status of the case if it remains pending or, if the case has been disposed of, state the final disposition.

ANSWER:

Not applicable.

INTERROGATORY NO. 112:

In any lawsuit, as described in Interrogatory numbers 89, 90, 110 and 111, has Defendant been subject to sanctions, a contempt citation or similar action for failing, or refusing to comply with, any court order, for discovery fraud, or for the failure to provide complete, accurate and truthful responses to discovery?

ANSWER:

No.

INTERROGATORY NO. 113:

If your answer to Interrogatory No. 112 is "Yes," with respect to each such occasion described:

- (a) Identify the lawsuit involved, the court which imposed the sanctions or issued the contempt citation, and any other court which reviewed the same;
- (b) Describe the violation for which sanctions or contempt was imposed;
- (c) If the violation involved the failure or refusal to produce any document(s), identify any and all such documents;
- (d) If the violation involved any failure to truthfully answer or to respond to interrogatories, identify any and all such interrogatories and your response thereto, including the person answering on your behalf;

- (e) State the present status or final disposition of the matter, which ever is applicable; and,
- (f) Identify any and all documents referring to, relating to or reflecting said matter, including, but not limited to, pleadings, exhibits and court orders.

ANSWER:

Not applicable.

INTERROGATORY NO. 114:

In any lawsuit involving a claim or claims based upon allegations of injury, impairment, disease or death allegedly caused by exposure to asbestos, has any document or conversation as to which the defendant, any predecessor or related company, asserted the attorney/client privilege been held by any court to be not privileged on the basis of the crime/fraud exception?

ANSWER:

No.

INTERROGATORY NO. 115:

If your answer to Interrogatory No. 114 is "Yes," identify any and all such documents or conversations described, and with respect to each:

- (a) Identify all persons whose actions were held to constitute a crime or fraud;
- (b) State the current status of the court's determination; and,
- (c) State whether you assert the privilege with respect to disclosing the document or conversation in this case.

ANSWER:

Not applicable.

INTERROGATORY NO. 116:

Identify any and all expert witnesses who have testified on behalf of the defendant, any predecessor or related company, in the last ten years in any lawsuits involving a claim or claims based upon allegations of injury, impairment, disease or death caused by exposure to asbestos, or a claim or claims based upon allegations of property damage from the use, application, installation or presence of asbestos or asbestos-containing products, or issues of insurance coverage for any claims of personal injury or property damage arising out of the exposure to, use of, application of, installation of, or presence of asbestos or asbestos-containing products.

ANSWER:

Pursuant to Court Order this interrogatory is withdrawn.

INTERROGATORY NO. 117:

Identify any and all present or former directors, officers, employees, or agents of defendant, any predecessor or related company, who have testified in any manner whatsoever including a discovery or evidence deposition, or in a trial, in the last 20 years on behalf of or against the defendant, any predecessor, or related company, in any lawsuits involving a claim or claims based upon allegations of personal injury or property damage caused by exposure to, the use of, the application of, the installation of, or the presence of any asbestos or asbestos-containing product, other than persons who testified as plaintiffs in their own cases. Specifically included within the scope of this request are any suits involving the issue of insurance coverage for claims of personal injury or property damage resulting from the exposure to, the use, application, installation or presence of asbestos or asbestos-containing products.

ANSWER:

Pursuant to Court Order this interrogatory is withdrawn.

INTERROGATORY NO. 118:

Identify any and all present or former directors, officers, employees, or agents of the defendant, any predecessor or any related company, other than persons appearing as adverse parties, who have testified against the defendant, any predecessor, or any related company in the last 20 years, in any proceeding involving the subject of asbestos, including, but not limited to, workers' compensation hearings, or any hearing before any governmental body.

ANSWER:

Pursuant to Court Order this interrogatory is withdrawn.

INTERROGATORY NO. 119:

With respect to your answers to Interrogatory numbers 116, 117, and 118, identify any and all documents, including, but not limited to, transcripts or notes of testimony, referring to, relating to or reflecting the testimony of such expert witnesses or employees, directors, officers, or agents.

ANSWER:

Pursuant to Court Order this interrogatory is withdrawn.

INTERROGATORY NO. 120:

Has Defendant, any predecessor or any related company, ever been cited, warned, fined, sanctioned or otherwise officially written up for, any violation of a federal, state or local statute, law, rule, ordinance, code, administrative order, executive order, or the like, by any federal, state or local governmental entity, which violation concerned asbestos in any way?

ANSWER:

No.

INTERROGATORY NO. 121:

If your answer to Interrogatory No. 120 is "Yes," with respect to each such violation:

- (a) Identify the governmental entity issuing the citation, warning, fine, sanction or write-up;
- (b) State the date of the citation, warning, fine, sanction or write-up;
- (c) Describe the violation and state the date(s) during which it occurred;
- (d) Identify the statute, law, rule, ordinance, code or order to which the violation related;
- (e) State what, if any, specific fine, penalty, or sanction was imposed;
- (f) State the date in which and the manner in which said violation was corrected;
- (g) Identify any and all officials of Defendant, its predecessor or its related company having knowledge or notice of said violation and state the date on which said knowledge or notice was received; and,
- (h) Identify any and all documents referring to, relating to or reflecting said violation.

ANSWER:

Not applicable.

INTERROGATORY NO. 122:

Has any federal, state or local government entity, at any time, conducted any inspection, test or survey concerning asbestos or asbestos exposure at any facility where the products listed in response to Interrogatory Nos. 19 and 42 were manufactured, processed, applied, used or removed?

ANSWER:

No.

INTERROGATORY NO. 123:

If your answer to Interrogatory No. 122 is "Yes," then with respect to each such inspection, test or survey:

- (a) Identify the governmental entity conducting the same;
- (b) State the date(s) on which the same was conducted;
- (c) Describe the nature of the inspection, test or survey including, but not limited to, the results or conclusions thereof; and,
- (d) Identify any and all documents referring to, relating to or reflecting the same.

ANSWER:

Not applicable.

INTERROGATORY NO. 124:

Identify:

- (a) Any expert whom you intend to call as a witness;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify;
- (d) A summary of the grounds for each opinion;
- (e) The address of such person and field of expertise;
- (f) Identify and produce each treatise, article or text upon which the expert will rely in testifying.

ANSWER:

These will be revealed according to the standard Order or any additional Orders in the case pertaining to the subject.

INTERROGATORY NO. 125:

Are there any policies of insurance which provide, or might provide, coverage on behalf of Defendant, any predecessor or any related company for the injuries alleged in Plaintiffs' complaints?

ANSWER:

Yes.

INTERROGATORY NO. 126:

If your answer to Interrogatory No. 125 is "Yes," identify each such policy of insurance as follows:

- (a) Identify the insurer(s);
- (b) Identify the insured(s);
- (c) State the date on which the policy was first purchased and the date on which the policy expired or was terminated;
- (d) Describe the coverage provided, including, but not limited to, the time period over which the policy applied, the nature of the acts, omissions and injuries covered, and whether the policy provides primary or excess coverage; and
- (e) State the dollar limits of the coverage provided, including, if applicable, the "per person" limitations and "per occurrence" limitation.

ANSWER:

As it relates to Koppers Company, Inc., please see produced list of insurance providers and policy information. With respect to Universal Refractories, (a) Travelers Insurance Company; (b) Thiem Corporation and its wholly owned subsidiaries; (c) 1975; (d) this policy has been referred to as a "1975-CUP policy." It is a general liability policy. This is a primary insurance policy; (e) Defendant is unaware of the per-occurrence or per-person limitation on the policy. However, Defendant believes that there is approximately \$25,000 remaining in policy limits, after which this insurance will be exhausted.

Carrier	Policy Term	Policy No.	GL Retention	Individual Limits
Travelers	3/31/61 to 3/31/62	KSL-9197398	N/A	\$ 200,000
Travelers	3/31/62 to 3/31/63	NSL-381869	N/A	\$ 200,000
Travelers	3/31/63 to 3/31/64	NSL-533025	N/A	\$ 500,000
Travelers	3/31/64 to 3/31/65	NSL-1422695	N/A	\$ 500,000
Travelers	3/31/65 to 3/31/66	NSL-1930716	N/A	\$ 500,000
Travelers	3/31/66 to 3/31/67	NSL-3097771	N/A	\$ 500,000
Travelers	3/31/67 to 3/31/68	NSL-6645306	N/A	\$ 500,000

Travelers	3/31/68 to 3/31/69	NSL-2263542	N/A	\$ 500,000
Travelers	3/31/69 to 3/31/70	NSL-2347279	N/A	\$ 500,000
Travelers	3/31/70 to 3/31/71	NSL-4147573	N/A	\$ 500,000
Travelers	3/31/71 to 3/31/72	NSL-6518948	N/A	\$ 500,000
Travelers	3/31/72 to 3/31/73	NSL-7611460	N/A	\$ 500,000
Travelers	3/31/73 to 3/31/74	650-335A237-A	N/A	\$1,000,000
Travelers	3/31/74 to 3/31/75	650-147B905-4	N/A	\$1,000,000
Travelers	3/31/75 to 3/31/76	650-147B905-4	N/A	\$ 300,000
Aetna	5/01/76 to 5/01/77	03AL-2532520-SRA	\$100,000	\$1,000,000
Aetna	5/01/77 to 5/01/78	03AL-253527-SRA	\$500,000	\$4,000,000
Aetna	5/01/78 to 5/01/79	03AL-253539-SRA	\$500,000	\$4,000,000
Aetna	5/01/79 to 5/01/80	03GL-9-SRA	\$500,000	\$4,000,000
Aetna	5/01/80 to 5/01/81	03GL-12-SRA	\$500,000	\$5,000,000
Travelers	5/01/80 to 2/02/81	TRL-NSL-180T450-A-81	\$500,000	\$5,000,000

INTERROGATORY NO. 127:

With respect to each policy described in response to Interrogatory No. 126, state:

- (a) the dollar amount of coverage which remains unexpended; and
- (b) whether any dispute exists between insurer and insured with respect to coverage.

ANSWER:

With respect to Koppers Company, Inc., Defendant has no knowledge regarding the current status of coverage unexpended. With respect to Thiem Corporation, see Interrogatory No. 126. Currently, there is no dispute between the insured and insurers with respect to this coverage.

INTERROGATORY NO. 128:

Other than the policies of insurance described in response to Interrogatory No. 126, do there exist any agreements providing for the benefit of Defendant, any predecessor or any related

company, complete or partial indemnification for any or all expenses incurred with respect to any or all of these cases, including, but not limited to, judgments, settlements, costs, experts' fees and/or attorneys' fees?

ANSWER:

No.

INTERROGATORY NO. 129:

If your answer to Interrogatory No. 128 is "Yes," for each such agreement:

- (a) Identify all parties to the agreement and state the capacity of each such party (i.e., indemnitor, indemnitee, etc.);
- (b) State the terms of the agreement, including the nature of the expenses covered and, if applicable, any limitations on payment, reimbursement or indemnification; and
- (c) Identify any and all documents referring to, relating to or reflecting said agreement.

ANSWER:

Not applicable.

INTERROGATORY NO. 130:

Was this Defendant ever allowed to use the trademark or logo of any other company, including but not limited to, its predecessor or related company, on any products Defendant sold, distributed or installed, and if so please state:

- (a) The trademark or logo used by you;
- (b) The company allowing such use of its trademark or logo;
- (c) The time period such use was allowed;
- (d) Whether such use was by written, verbal or implied agreement;
- (e) Each and every product such trademark or logo was placed upon;

- (f) Identify all documents which refer to, relate to or reflect the use of such trademark or logo.

ANSWER:

No.

INTERROGATORY NO. 131:

From 1940 to present, state whether Defendant and/or any predecessor or related company ever provided workers' compensation, health, accident and disability and/or life insurance coverage for its employees, and if so:

- (a) Identify each insurance carrier which provided workers' compensation, health, accident and disability and/or life insurance coverage to your employees and the dates such coverage was provided by each such carrier;
- (b) State whether such insurance carrier(s) ever conducted any dust counts or studies, industrial hygiene surveys or other tests relating to any asbestos-containing products that Defendant's employees may have been working with or around; and,
- (c) If your response to subpart (b) hereof is in the affirmative, please indicate the date of each such count, study, survey or other test and identify all documents relating thereto.

ANSWER:

Pursuant to Court Order subpart a has been withdrawn. As to 131 (b) and (c), Defendant is unaware of any such information.

INTERROGATORY NUMBER 132:

Other than cases identified in Interrogatories 89, 90, 110 and 111, has defendant, any predecessor or any related company, ever appeared as a party in any lawsuit involving a claim or claims based upon issues of insurance for any claim of personal injury, property damage or cost of abatement arising out of the exposure to, use of, application of, installation of or presence of asbestos or asbestos-containing products?

ANSWER:

No.

INTERROGATORY NUMBER 133:

If your answer to Interrogatories 89, 90, 110 and 111 is "yes", identify each such lawsuit as follows:

- (a) Identify all plaintiff(s);
- (b) Identify all defendant(s);
- (c) State when and where the case was filed;
- (d) Identify each court in which the case was heard or is pending, including appeals, and state the style and cause number of the case in each court; and
- (e) State the current status of the case if it remains pending or, if the case has been disposed of, state the final disposition.

ANSWER:

See responses to these interrogatories.

INTERROGATORY NUMBER 134:

Is the defendant, any predecessor or related company, claiming any document responsive to any interrogatory or any request for production filed by The Simmons Firm as being protected from disclosure because of a privilege claimed for any reason? If yes, please list each document being claimed as protected from disclosure in a privilege log providing the date of the document, the identity of the author, what individual or entity the document was addressed to, the identity of any individuals or entities provided copies of the document, a brief description of the nature of the document, and the particular privilege claimed as shielding the document from disclosure.

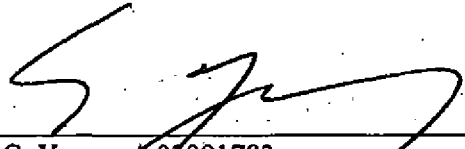
ANSWER:

See the attached Privilege Log.

Privilege Log

1. A February 19, 1998 letter from Michael Bucci, Attorney for Beazer East to Amy Gee, a paralegal in the law department at Beazer East, Inc. discussing hot tops and enclosing the letter from Thomas Reid, in-house counsel at Koppers, dated September 3, 1981 and the memos of Greg Curran in #3 below. A copy was sent to Mary Wright, in-house attorney at Beazer and James Zeszutek, an attorney representing Universal.
Attorney/Client Privilege
2. A September 3, 1981 letter from Thomas Reid, in-house counsel at Koppers Company, Inc. to Robert Little, attorney retained by Koppers Company, Inc. in the Sapp vs. Universal Refractories case regarding answers to interrogatories and analyzing case. A copy was sent to Walter Sylvester, President of Universal Refractories.
Attorney/Client Privilege
3. Memos from Greg Curran, Assistant Account Manager and in-house counsel at The Travelers, the insurer for Universal dated 7/05/94, 7/11/94 and 8/10/94. These memos were prepared in anticipation of litigation and prepared for use in pending litigation. The 7/05/94 memo discusses Universal's product lines, the memo discusses pending litigation. The 7/11/94 memo discusses corporate history and operations of Universal Refractories that was prepared in anticipation of litigation and for use in pending litigation. The 8/10/94 memo concerns a meeting with defense counsel Jim Zeszutek, independent counsel retained to defend Universal in pending lawsuits and concerns a meeting with President of Universal, Walt Sylvester, Executive Vice-President in charge of sales, Ed Davidson, and the Vice-President of Quality Control, Regis Frederick.
Attorney/Client and Work Product Privilege
4. An index of the contents of approximately 27,000 boxes of corporate records was compiled in approximately 1989-1990 at the direction and request of Beazer's law department for the purpose of addressing document requests in pending and anticipated litigation. The index was compiled in a manner using categories specified by the law department that could reveal the law department's strategy and litigation plans and a review of the index could give mental impression and theories. In addition the vast majority of the index has nothing to do with issues involving asbestos or issues relevant to these lawsuits. Thus, any disclosure of the index in this litigation could prejudice Beazer in other litigation. **Work Product Privilege**

DUNHAM, BOMAN & LESKERA

BY: 

Eric C. Young, # 03091783

Attorney for Defendant, Beazer East, Inc.,
Individually, and as Successor to Koppers
Company, Inc., and Incorrectly Identified as
Successor in Interest to Thiem Corporation
and Universal Refractories Company

208 North High Street
Belleville, IL 62220
618-235-7222; fax: 236-2800
e-mail: db1103@mvp.net

Commonwealth of Pennsylvania

County of Allegheny

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**AFFIDAVIT OF MARY
DOMBROWSKI WRIGHT**

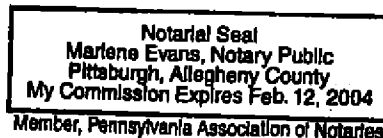
PERSONALLY CAME AND APPEARED BEFORE ME, the undersigned authority in and for the aforesaid jurisdiction, the within named MARY DOMBROWSKI WRIGHT, personally known to me to be the Litigation Manager and Assistant Secretary of BEAZER EAST, INC. F/K/A KOPPERS COMPANY, INC., who acknowledges that she is authorized to make this Affidavit on behalf of BEAZER EAST, INC. F/K/A KOPPERS COMPANY, INC. She further deposed and said that: the matters stated in the foregoing Objections and Responses to Plaintiff's Interrogatories and Requests for Production are not wholly within her personal knowledge, there is no current employee with personal knowledge of all such matters; and that the Objections and Responses have been made based upon corporate records and other information assembled or provided by authorized employees and she is informed and believes that the Objections and Responses are true and correct.

Mary Dombrowski Wright

MARY DOMBROWSKI WRIGHT

Sworn to and subscribed
before me this 21st day of
June, 2002.

Marlene Evans
Notary Public



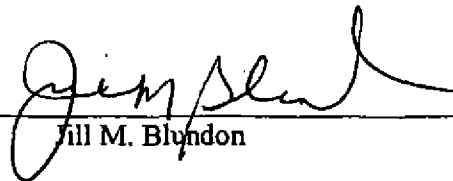
Commonwealth of Pennsylvania)

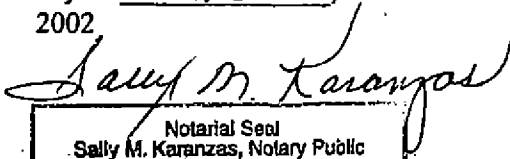
County of Allegheny)

ss: Affidavit of Jill M. Blundon

BEFORE ME, the undersigned Notary Public, on this day personally appeared Jill M. Blundon who, being by me duly sworn on her oath, deposed and said that she was the General Counsel of Thiem Corporation. That Universal Refractories Corporation was merged into Thiem Corporation and ceased to exist as a separate corporate entity in 1977. That Thiem Corporation was dissolved in 1991 pursuant to the Delaware Corporate Code. That she was General Counsel at the time of the dissolution of Thiem and that she is authorized to make this Affidavit on behalf of Universal Refractories, formerly a Division of Thiem Corporation and Thiem Corporation. She further deposed and said that: the matters stated in the foregoing **DEFENDANT BEAZER EAST, INC.'S OBJECTIONS AND ANSWERS TO PLAINTIFFS' INTERROGATOIRES AND REQUESTS FOR PRODUCTION OF DOCUMENTS** are not wholly within her personal knowledge, there is no current employee with personal knowledge of all such matters; and that the Answers have been made based upon corporate records and other information assembled or provided by authorized employees and affiant is informed and believes that the Responses are true and correct.

Sworn to and subscribed
before me this 21st
day of JUNE,
2002


Jill M. Blundon



Notarial Seal
Sally M. Karanzas, Notary Public
Pittsburgh, Allegheny County
My Commission Expires Apr. 27, 2003

Member, Pennsylvania Association of Notaries