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6 Attorneys for Defendant
 7 RILEY STOKER CORPORATION

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

9
 10 IN RE:) NO. 828684
 COMPLEX ASBESTOS LITIGATION))
 11) DEFENDANT RILEY STOKER
) CORPORATION'S AMENDED RESPONSES
 12) TO PLAINTIFFS' STANDARD GENERAL
) ORDER 129 INTERROGATORIES
 13)
)
 14)

15
 16
 17 Riley Stoker Corporation "Riley Stoker" or the "Company"),
 18 pursuant to and under the protection of the California Rules of
 19 Civil Procedures, hereby files these responses to Plaintiffs'
 20 Standard Asbestos Case Interrogatories (hereinafter
 21 "Interrogatories") pursuant to San Francisco Superior Court
 22 General Order No. 129.

23 RESPONSE NO. 1

24 James S. Brantl, General Counsel, DB Riley, Inc., P.O. Box
 25 15040, Worcester, MA. 01615-0040.

26 RESPONSE NO. 2

27 James S. Brantl, Esquire, joined Riley Stoker as an
 28 Attorney in October of 1976. He became Senior Corporate Attorney

1 in 1984. Since January of 1988, he has held the position of
2 General Counsel.

3 RESPONSE NO. 3

4 Riley Stoker states that it is a corporation.

5 A. Riley Stoker Corporation.

6 B. Commonwealth of Massachusetts.

7 C. 1921.

8 D. 5 Neponset Street, Worcester, Massachusetts 01613.

9 E. If this interrogatory is asking whether Riley Stoker
10 is licensed to do business in California, Riley Stoker
11 states that it is licensed to do business in
12 California.

13 F. Not applicable.

14 G. No business offices in California.

15 RESPONSE NO. 4

16 Yes.

17 RESPONSE NO. 5

18 See Exhibit 1.

19 RESPONSE NO. 6

20 Not applicable.

21 RESPONSE NO. 7

22 Not applicable.

23 RESPONSE NO. 8

24 Not applicable.

25 RESPONSE NO. 9

26 Norman Sarkisian, who is the manager of Administrative
27 Services and Facilities.

28 /////

1 RESPONSE NO. 10

2 Riley Stoker does not concede that its boilers are or were
3 "asbestos-containing products." Riley Stoker Corporation nor any
4 company it controlled, purchased, or acquired any interest in has
5 ever made, mined, manufactured, distributed or processed, as
6 Riley Stoker Corporation understands these terms, raw asbestos or
7 asbestos-containing products, which Riley Stoker Corporation
8 understands to mean thermal insulation products that contain
9 asbestos as an ingredient. Furthermore, this interrogatory
10 appears to be directed to manufacturers of asbestos-containing
11 products. As Riley Stoker did not manufacture asbestos-
12 containing products, this interrogatory is inapplicable.

13 Riley Stoker states that it has supplied asbestos-
14 containing products manufactured by others as a component of some
15 of the boilers it has fabricated. Riley Stoker followed the
16 directions and specifications of owners or their agents in
17 selecting material for boilers and relied upon sales information
18 supplied by manufacturers of asbestos-containing products. Riley
19 Stoker cannot answer further since no identification of specific
20 boilers has been made.

21 RESPONSE NO. 11

22 Riley Stoker has no knowledge of ever employing a medical
23 director, industrial hygienist or physician.

24 RESPONSE NO. 12

25 Riley Stoker has no knowledge of any employee who has
26 testified by deposition or at trial/ on Riley Stoker's behalf.

27 RESPONSE NO. 13

28 Riley Stoker has no knowledge of membership or of ever

1 paying dues for a representative to be a member of the listed
2 organizations.

3 RESPONSE NO. 14

4 Not applicable.

5 RESPONSE NO. 15

6 Riley Stoker has no knowledge of ever receiving documents
7 containing results or conclusions of any studies and/or tests
8 conducted by Bonsib for Standard Oil of New Jersey.

9 RESPONSE NO. 16

10 Riley Stoker has no knowledge of having received a copy or
11 any portion of any studies and/or tests conducted by any
12 insurance company prior to 1973 relating to asbestos exposure in
13 the place of work.

14 RESPONSE NO. 17

15 Riley Stoker has no knowledge of having received any
16 documents containing results or conclusions of any studies and/or
17 tests conducted by any laboratory relating to asbestos exposure
18 prior to 1973.

19 RESPONSE NO. 18

20 Riley Stoker has no knowledge of ever maintaining any
21 library which contained materials related to the subjects of
22 asbestos, industrial hygiene, medicine, safety and/or
23 occupational disease.

24 RESPONSE NO. 19

25 Riley Stoker has no knowledge that prior to 1980 it
26 exchanged documents or communicated with any person or other
27 company expressly regarding the results of tests and/or studies
28 relating to asbestos exposure in the place of work or the human

1 health consequences of exposure to asbestos.

2 RESPONSE NO. 20

3 Riley Stoker has no knowledge of any employee or designer
4 of Riley Stoker that has testified as a representative of Riley
5 Stoker before the Occupational Safety and Health Administration,
6 the National Institute of Occupational Safety and Health, or any
7 committee or subcommittee of the United States Congress relating
8 to asbestos exposure.

9 RESPONSE NO. 21

10 Riley Stoker states that it does not concede that its
11 boilers are or were "asbestos-containing products." Riley Stoker
12 Corporation nor any company it controlled, purchased, or acquired
13 any interest in has ever made, mined, manufactured, distributed
14 or processed, as Riley Stoker Corporation understands these
15 terms, raw asbestos or asbestos-containing products, which Riley
16 Stoker Corporation understands to mean thermal insulation
17 products that contain asbestos as an ingredient. Furthermore,
18 this interrogatory appears to be directed to manufacturers of
19 asbestos-containing products. As Riley Stoker did not
20 manufacture asbestos-containing products, this interrogatory is
21 inapplicable.

22 RESPONSE NO. 22

23 Riley Stoker does not concede that its boilers are or were
24 "asbestos-containing products." Riley Stoker Corporation nor any
25 company it controlled, purchased, or acquired any interest in has
26 ever made, mined, manufactured, distributed or processed, as
27 Riley Stoker Corporation understands these terms, raw asbestos or
28 asbestos-containing products, which Riley Stoker Corporation

1 understands to mean thermal insulation products that contain
2 asbestos as an ingredient. Furthermore, this interrogatory
3 appears to be directed to manufacturers of asbestos-containing
4 products. As Riley Stoker did not manufacture asbestos-
5 containing products, this interrogatory is inapplicable.

6 RESPONSE NO. 23

7 Riley Stoker does not concede that its boilers are or were
8 "asbestos-containing products." Riley Stoker Corporation nor any
9 company it controlled, purchased, or acquired any interest in has
10 ever made, mined, manufactured, distributed or processed, as
11 Riley Stoker Corporation understands these terms, raw asbestos or
12 asbestos-containing products, which Riley Stoker Corporation
13 understands to mean thermal insulation products that contain
14 asbestos as an ingredient. Furthermore, this interrogatory
15 appears to be directed to manufacturers of asbestos-containing
16 products. As Riley Stoker did not manufacture asbestos-
17 containing products, this interrogatory is inapplicable.

18 RESPONSE NO. 24

19 Riley Stoker has no knowledge of a medical examination
20 program that was made available to its employees to determine the
21 absence or presence of asbestos-related disease.

22 RESPONSE NO. 25

23 Riley Stoker does not concede that its boilers are or were
24 "asbestos-containing products." Riley Stoker Corporation nor any
25 company it controlled, purchased, or acquired any interest in has
26 ever made, mined, manufactured, distributed or processed, as
27 Riley Stoker Corporation understands these terms, raw asbestos or
28 asbestos-containing products, which Riley Stoker Corporation

1 understands to mean thermal insulation products that contain
2 asbestos as an ingredient. Riley Stoker was named in two
3 workers' compensation proceedings in which the claimants sought
4 compensation for alleged asbestos-related injuries. Ernest R.
5 Moreno v. Marine Engineering & Supply Co., et. al., claim number
6 L.A. 76-144, was brought in the Industrial Accident Commission of
7 the State of California in 1947. The suit was dismissed as to
8 Riley Stoker. In or around August 1956, Riley Stoker appears to
9 have received a Notice of Hearing from the Workers' Compensation
10 Department of the State of Michigan in connection with Lewis
11 Munger v. Armstrong Cork Co., Travelers Insurance Co.. So far as
12 Riley Stoker is able to determine, neither claim included any
13 "report or communication" regarding the alleged hazards of
14 asbestos apart from the making of the claim itself. Discovery is
15 continuing. Riley Stoker therefore reserves the right to amend
16 or supplement this response.

17 RESPONSE NO. 26

18 Riley Stoker anticipates it has sufficient insurance
19 coverage with which to satisfy reasonable judgments in these
20 cases.

21 RESPONSE NO. 27

22 Riley Stoker does not concede that its boilers are or were
23 "asbestos-containing products." Riley Stoker Corporation nor any
24 company it controlled, purchased, or acquired any interest in has
25 ever made, mined, manufactured, distributed or processed, as
26 Riley Stoker understands these terms, raw asbestos or asbestos-
27 containing products, which Riley Stoker Corporation understands
28 to mean thermal insulation products that contain asbestos as an

1 ingredient.

2 RESPONSE NO. 28

3 Riley Stoker has never mined, milled, supplied, imported,
4 processed, distributed, marketed, sold or brokered raw asbestos.

5 RESPONSE NO. 29

6 Not applicable.

7 RESPONSE NO. 30

8 Riley Stoker does not concede that its boilers are or were
9 "asbestos-containing products." Riley Stoker Corporation nor any
10 company it controlled, purchased, or acquired any interest in has
11 ever made, mined, manufactured, distributed, processed, imported,
12 marketed, labeled or brokered as Riley Stoker Corporation
13 understands these terms, asbestos-containing products, which
14 Riley Stoker Corporation understands to mean thermal insulation
15 products that contain asbestos as an ingredient. At times
16 between 1930 and 1985, Riley Stoker supplied asbestos-containing
17 products manufactured by others as a component of some of the
18 boilers it has fabricated. Riley Stoker followed the directions
19 and specifications of owners or their agents in selecting
20 material for boilers and relied upon sales information supplied
21 by manufacturers of asbestos-containing products. Riley Stoker
22 cannot answer further since no identification of specific boilers
23 has been made.

24 RESPONSE NO. 31

25 Riley Stoker does not concede that its boilers are or were
26 "asbestos-containing products." Riley Stoker Corporation nor any
27 company it controlled, purchased, or acquired any interest in has
28 ever made, mined, manufactured, distributed, processed, imported,

1 marketed, labeled or brokered as Riley Stoker Corporation
2 understands these terms, asbestos-containing products, which
3 Riley Stoker Corporation understands to mean thermal insulation
4 products that contain asbestos as an ingredient. At times
5 between 1930 and 1985, Riley Stoker supplied asbestos-containing
6 products manufactured by others as a component of some of the
7 boilers it has fabricated. Riley Stoker followed the directions
8 and specifications of owners or their agents in selecting
9 material for boilers and relied upon sales information supplied
10 by manufacturers of asbestos-containing products. Riley Stoker
11 cannot answer further since no identification of specific boilers
12 has been made.

13 RESPONSE NO. 32

14 Not applicable.

15 RESPONSE NO. 33

16 Not applicable.

17 RESPONSE NO. 34

18 Not applicable.

19 RESPONSE NO. 35

20 Riley Stoker does not concede that its boilers are or were
21 "asbestos-containing products." Riley Stoker Corporation nor any
22 company it controlled, purchased, or acquired any interest in has
23 ever made, mined, manufactured, distributed or processed, as
24 Riley Stoker understands these terms, raw asbestos or asbestos-
25 containing products, which Riley Stoker Corporation understands
26 to mean thermal insulation products that contain asbestos as an
27 ingredient. Riley Stoker Corporation has no knowledge of
28 entering into any agreements for the rebranding of products.

1 RESPONSE NO. 36

2 Riley Stoker does not concede that its boilers are or were
3 "asbestos-containing products." Riley Stoker Corporation nor any
4 company it controlled, purchased, or acquired any interest in has
5 ever made, mined, manufactured, distributed or processed, as
6 Riley Stoker understands these terms, raw asbestos or asbestos-
7 containing products, which Riley Stoker Corporation understands
8 to mean thermal insulation products that contain asbestos as an
9 ingredient. Riley Stoker Corporation has no knowledge of
10 entering into any agreements for the rebranding of products.

11 RESPONSE NO. 37

12 Riley Stoker does not concede that its boilers are or were
13 "asbestos-containing products." Riley Stoker Corporation nor any
14 company it controlled, purchased, or acquired any interest in has
15 ever made, mined, manufactured, distributed, processed, imported,
16 marketed, labeled or brokered as Riley Stoker Corporation
17 understands these terms, asbestos-containing products, which
18 Riley Stoker Corporation understands to mean thermal insulation
19 products that contain asbestos as an ingredient. At times
20 between 1930 and 1985, Riley Stoker supplied asbestos-containing
21 products manufactured by others as a component of some of the
22 boilers it has fabricated. Riley Stoker followed the directions
23 and specifications of owners or their agents in selecting
24 material for boilers and relied upon sales information supplied
25 by manufacturers of asbestos-containing products. Riley Stoker
26 cannot answer further since no identification of specific boilers
27 has been made.

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1 RESPONSE NO. 38

2 Riley Stoker does not concede that its boilers are or were
3 "asbestos-containing products." Riley Stoker Corporation nor any
4 company it controlled, purchased, or acquired any interest in has
5 ever made, mined, manufactured, distributed, processed, imported,
6 marketed, labeled or brokered as Riley Stoker Corporation
7 understands these terms, asbestos-containing products, which
8 Riley Stoker Corporation understands to mean thermal insulation
9 products that contain asbestos as an ingredient. At times
10 between 1930 and 1985, Riley Stoker supplied asbestos-containing
11 products manufactured by others as a component of some of the
12 boilers it has fabricated. Riley Stoker followed the directions
13 and specifications of owners or their agents in selecting
14 material for boilers and relied upon sales information supplied
15 by manufacturers of asbestos-containing products. Riley Stoker
16 cannot answer further since no identification of specific boilers
17 has been made. Riley Stoker further states that an identifying
18 name plate was attached to each Riley Stoker boiler.

19 RESPONSE NO. 39

20 Riley Stoker does not concede that its boilers are or were
21 "asbestos-containing products." Riley Stoker Corporation nor any
22 company it controlled, purchased, or acquired any interest in has
23 ever made, mined, manufactured, distributed, processed, imported,
24 marketed, labeled or brokered as Riley Stoker Corporation
25 understands these terms, asbestos-containing products, which
26 Riley Stoker Corporation understands to mean thermal insulation
27 products that contain asbestos as an ingredient.

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1 RESPONSE NO. 40

2 Riley Stoker does not concede that its boilers are or were
3 "asbestos-containing products." Riley Stoker Corporation nor any
4 company it controlled, purchased, or acquired any interest in has
5 ever made, mined, manufactured, distributed, processed, imported,
6 marketed, labeled or brokered as Riley Stoker Corporation
7 understands these terms, asbestos-containing products, which
8 Riley Stoker Corporation understands to mean thermal insulation
9 products that contain asbestos as an ingredient. At times
10 between 1930 and 1985, Riley Stoker supplied asbestos-containing
11 products manufactured by others as a component of some of the
12 boilers it has fabricated. Riley Stoker followed the directions
13 and specifications of owners or their agents in selecting
14 material for boilers and relied upon sales information supplied
15 by manufacturers of asbestos-containing products. Riley Stoker
16 cannot answer further since no identification of specific boilers
17 has been made.

18 RESPONSE NO. 41

19 Riley Stoker does not concede that its boilers are or were
20 "asbestos-containing products." Riley Stoker Corporation nor any
21 company it controlled, purchased, or acquired any interest in has
22 ever made, mined, manufactured, distributed or processed, as
23 Riley Stoker Corporation understands these terms, raw asbestos or
24 asbestos-containing products, which Riley Stoker Corporation
25 understands to mean thermal insulation products that contain
26 asbestos as an ingredient. Riley Stoker states that it has
27 supplied asbestos-containing products manufactured by others as a
28 component of some of the boilers it has fabricated. Riley Stoker

1 followed the directions and specifications of owners or their
2 agents in selecting material for boilers and relied upon sales
3 information supplied by manufacturers of asbestos-containing
4 products. Riley Stoker cannot answer the remainder of the
5 interrogatory since no identification of specific boilers has
6 been made.

7 RESPONSE NO. 42

8 Riley Stoker has no knowledge of contract units within its
9 corporate structure.

10 RESPONSE NO. 43

11 Not applicable.

12 RESPONSE NO. 44

13 Sometime after 1972 Riley Stoker became aware that some
14 diseases were alleged to be associated with exposure to asbestos.

15 RESPONSE NO. 45

16 Riley Stoker has no knowledge of how it became aware of
17 that there was an association between asbestos exposure and
18 disease in human beings.

19 RESPONSE NO. 46

20 See response to interrogatory numbers 44 and 45.

21 RESPONSE NO. 47

22 Riley Stoker does not concede that its boilers are or were
23 "asbestos-containing products." Riley Stoker Corporation nor any
24 company it controlled, purchased, or acquired any interest in has
25 ever made, mined, manufactured, distributed or processed, as
26 Riley Stoker Corporation understands these terms, raw asbestos or
27 asbestos-containing products, which Riley Stoker Corporation
28 understands to mean thermal insulation products that contain

1 asbestos as an ingredient. Furthermore, this interrogatory
2 appears to be directed to manufacturers of asbestos-containing
3 products. As Riley Stoker did not manufacture asbestos-
4 containing products, this interrogatory is inapplicable.

5 RESPONSE NO. 48

6 Riley Stoker states that it does not concede that its
7 boilers are or were "asbestos-containing products." Riley Stoker
8 Corporation nor any company it controlled, purchased, or acquired
9 any interest in has ever made, mined, manufactured, distributed
10 or processed, as Riley Stoker Corporation understands these
11 terms, raw asbestos or asbestos-containing products, which Riley
12 Stoker Corporation understands to mean thermal insulation
13 products that contain asbestos as an ingredient. Furthermore,
14 this interrogatory appears to be directed to manufacturers of
15 asbestos-containing products. As Riley Stoker did not
16 manufacture asbestos-containing products, this interrogatory is
17 inapplicable.

18 RESPONSE NO. 49

19 Riley Stoker states that it does not concede that its
20 boilers are or were "asbestos-containing products." Riley Stoker
21 Corporation nor any company it controlled, purchased, or acquired
22 any interest in has ever made, mined, manufactured, distributed
23 or processed, as Riley Stoker Corporation understands these
24 terms, raw asbestos or asbestos-containing products, which Riley
25 Stoker Corporation understands to mean thermal insulation
26 products that contain asbestos as an ingredient. Furthermore,
27 this interrogatory appears to be directed to manufacturers of
28 asbestos-containing products. As Riley Stoker did not

1 manufacture asbestos-containing products, this interrogatory is
2 inapplicable as to Riley Stoker. Riley Stoker states that it has
3 supplied asbestos-containing products manufactured by others as a
4 component of some of the boilers it has fabricated. Riley Stoker
5 followed the directions and specifications of owners or their
6 agents in selecting material for boilers and relied upon sales
7 information and warnings supplied by manufacturers of asbestos-
8 containing products. Riley Stoker cannot answer the remainder of
9 the interrogatory since no identification of specific boilers has
10 been made.

11 RESPONSE NO. 50

12 Riley Stoker states that it does not concede that its
13 boilers are or were "asbestos-containing products." Riley Stoker
14 Corporation nor any company it controlled, purchased, or acquired
15 any interest in has ever made, mined, manufactured, distributed
16 or processed, as Riley Stoker Corporation understands these
17 terms, raw asbestos or asbestos-containing products, which Riley
18 Stoker Corporation understands to mean thermal insulation
19 products that contain asbestos as an ingredient. Furthermore,
20 this interrogatory appears to be directed to manufacturers of
21 asbestos-containing products. As Riley Stoker did not
22 manufacture asbestos-containing products, this interrogatory is
23 inapplicable.

24 RESPONSE NO. 51

25 Riley Stoker Corporation has no knowledge of ever owning or
26 operating a railroad.

27 RESPONSE NO. 52

28 Riley Stoker Corporation has no knowledge of ever owning or

1 operating a shipyard.

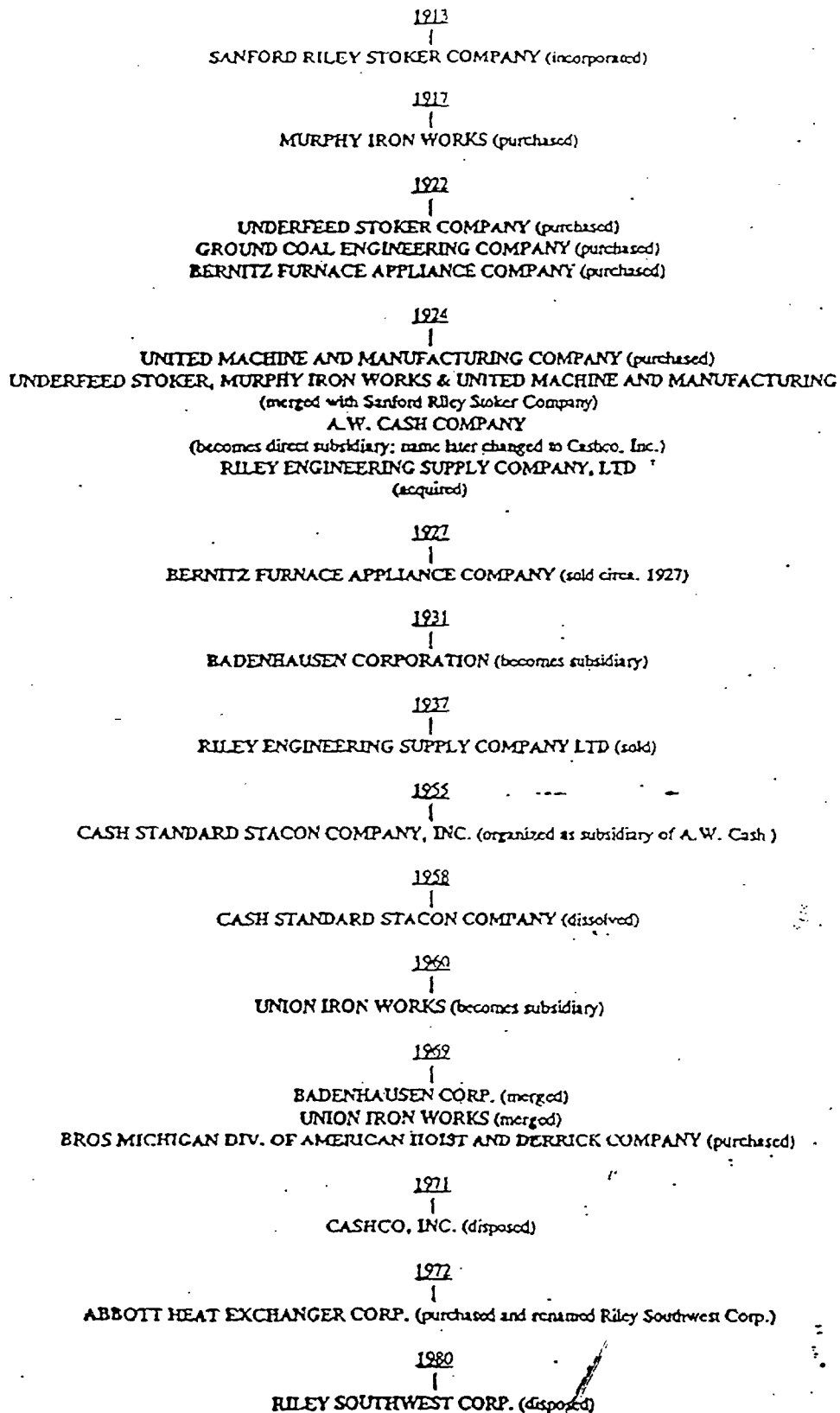
2 RESPONSE NO. 53

3 Riley Stoker does not concede that its boilers are or were
4 "asbestos-containing products." Riley Stoker Corporation nor any
5 company it controlled, purchased, or acquired any interest in has
6 ever made, mined, manufactured, distributed or processed, as
7 Riley Stoker Corporation understands these terms, raw asbestos or
8 asbestos-containing products, which Riley Stoker Corporation
9 understands to mean thermal insulation products that contain
10 asbestos as an ingredient. Furthermore, this interrogatory
11 appears to be directed to manufacturers of asbestos-containing
12 products. As Riley Stoker did not manufacture asbestos-
13 containing products, this interrogatory is inapplicable.

14 DATED: December 8, 1997

15 By Thomas E. Pfalzer
16 Thomas E. Pfalzer
17 Attorneys for Defendant RILEY STOKER
18 CORPORATION
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RILEY STOKER CORPORATE HISTORY



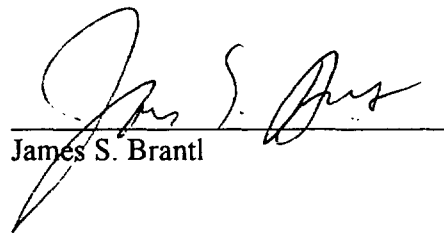
VERIFICATION

COMMONWEALTH OF MASSACHUSETTS)

COUNTY OF WORCESTER)

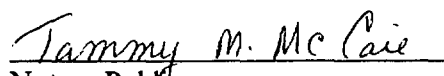
ss

JAMES S. BRANTL, being duly sworn, deposes and says that he is an authorized agent of DB Riley, Inc., and that he verifies the foregoing Defendant, DB Riley, Inc.'s Amended Responses to Plaintiffs' Standard Asbestos Case Interrogatories for and on behalf of DB Riley, Inc.; that of the matters stated therein are not within the personal knowledge of deponent; that the facts stated therein have been assembled by authorized employees and counsel of DB Riley, Inc., and deponent is informed that the facts stated therein are true.


James S. Brantl

SWORN TO BEFORE ME and subscribed in my presence this 17th day of

December, 1997.


Notary Public

My commission expires: July 3, 2003

1 PROOF OF SERVICE BY MAIL (C.C.P. §§ 1013a, 2015.5)

2 I hereby declare that I am a citizen of the United States, am
3 over the age of eighteen years, and not a party to the within
4 action; my business address is 1211 Newell Avenue, Second Floor,
5 Walnut Creek, California 94596.

6 On this date I served the foregoing RILEY STOKER
7 CORPORATION'S AMENDED RESPONSES TO PLAINTIFFS' STANDARD GENERAL
8 ORDER 129 INTERROGATORIES on the parties in said action, by placing
9 a true copy thereof enclosed in a sealed envelope with postage
10 thereon fully prepaid, in the United States Post Office mail box at
11 Walnut Creek, California, addressed as follows:

12 Bruce L. Ahnfeldt, Esq.
13 LAW OFFICES OF BRUCE L. AHNFELDT
14 P.O. Box 6078
Napa, CA 94581

15 Alan R. Brayton, Esq.
16 BRAYTON, HARLEY & CURTIS
222 Rush Landing Road
17 P.O. Box 2109
Novato, CA 94948

18 Jack K. Clapper, Esq.
19 LAW OFFICES OF JACK K. CLAPPER
Marine Office Plaza
20 2330 Marinship Way, Suite 140
Sausalito, CA 94965

21 Christopher E. Grell, Esq.
22 LAW OFFICES OF CHRISTOPHER E. GRELL
685 Market Street, Suite 540
San Francisco, CA 94105

23 Steven Kazan, Esq.
24 KAZAN, McCLAIN, EDISES, SIMON & ABRAMS
171 Twelfth Street, Suite 300
Oakland, CA 94607

25 Harry F. Wartnick, Esq.
26 WARTNICK, CHABER, HAROWITZ, SMITH & TIGERMAN, INC.
101 California Street, Suite 2200
27 San Francisco, CA 94111

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I declare under penalty of perjury that the foregoing is true
and correct.

Executed on January 12, 1998, at Walnut Creek, California.

Rowena Walker
ROWENA WALKER