

IN RE: ALL ASBESTOS-RELATED § IN THE DISTRICT COURTS OF
PERSONAL INJURY OR §
DEATH CASES FILED OR TO § DALLAS COUNTY, TEXAS
BE FILED IN DALLAS §
COUNTY, TEXAS § 160TH DISTRICT COURT

**DEFENDANT CONGOLEUM CORPORATION'S OBJECTIONS,
ANSWERS AND RESPONSES TO PLAINTIFFS' MASTER INTERROGATORIES
AND REQUESTS FOR PRODUCTION PROPOUNDED TO DEFENDANT**

TO: Plaintiffs, by and through their attorneys of record, Mr. Russell Budd, Baron & Budd, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219 and Mr. Roger Worthington, Silber, Pearlman & Worthington, 1000 Highland Park Place, 4514 Cole Ave., LB 34, Dallas, Texas 75205-4185.

COMES NOW, CONGOLEUM CORPORATION, one of the Defendants in the above-entitled cause, and files the attached Objections, Answers and Responses to Plaintiffs' Master Interrogatories and Request for Production Propounded to all Defendants, pursuant to Rules 167 and 168 of the Texas Rules of Civil Procedure.

Respectfully submitted,

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By: 

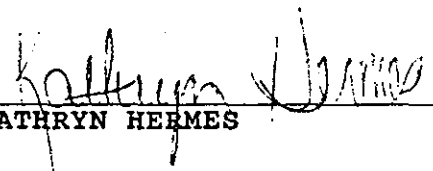
KATHRYN HERMES
SBN: 15156500



MAY 26 1992

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objections, Answers and Responses to Interrogatories and Request for Production has been sent to counsel for Plaintiffs by certified mail, return receipt requested, and to all other counsel by regular mail, all on this the 21st day of May, 1992.


KATHRYN HERMES

INTRODUCTION

Congoleum Corporation is a manufacturer of resilient flooring materials. The present management of Congoleum Corporation is not personally familiar with much of the corporate activity and organization of the companies who previously owned and operated the resilient flooring operations now owned and operated by it. The present Congoleum Corporation lacks personal knowledge, and largely, documents and other records of the entities.

Many of the events which may be relevant to the issues in this litigation occurred prior to the inception of the present Congoleum Corporation. In addition, much of the information being sought by Plaintiffs involves events which occurred decades prior to the commencement of this litigation. Many of the individuals who might have had personal knowledge of the matters to which Plaintiffs' discovery relates are deceased or otherwise unavailable to Congoleum Corporation. Congoleum Corporation does not know whether at least some documents which relate to the matters inquired about were discarded in the regular course of business prior to the commencement of the asbestos personal injury litigation. Furthermore, no single individual can be found who is aware of all facts relevant to this litigation. Information must be assimilated from those records which still exist and from former employees of companies other than Congoleum Corporation. Accordingly, Congoleum Corporation can only relay certain information. It cannot attest to the accuracy or truthfulness of information for which it has no personal knowledge. Information of this nature is being supplied because it may lead to the discovery of admissible evidence.

For these reasons, the information being provided may be incomplete. Congoleum Corporation is engaged in a continuing investigation of the subject matter sought by this discovery, and its responses are based on this investigation. Congoleum Corporation cannot exclude the possibility that its continued investigation may at sometime reveal more complete information, or even information which indicates that an answer which is now being supplied is incorrect.

This introduction is explicitly incorporated into each of the responses and answers now provided.

GENERAL OBJECTIONS

1. The questions as stated request information going back many years. CONGOLEUM CORPORATION has found it difficult, if not impossible, to reconstruct or retrieve much of the information requested. Therefore, the answers given are based on facts presently known by CONGOLEUM CORPORATION.
2. Given these Interrogatories are addressed to multiple Defendants who may be responsible for manufacturing, mining, designing, milling, applying or distributing various products, necessarily many of the questions are objectionable on the grounds of being overly broad, burdensome, vague and ambiguous. In addition, several of the questions are not sufficiently limited in time and/or use terms which do not refer to products manufactured or distributed by CONGOLEUM CORPORATION. Defendant accordingly objects on the grounds such Interrogatories are irrelevant and immaterial to the allegations against this Defendant.
3. CONGOLEUM CORPORATION does not now and never has sold asbestos and/or asbestos-containing insulation products as that term is commonly used and understood in this type of litigation. Therefore, CONGOLEUM CORPORATION objects to any questions referring to or assuming that such are or have been sold by CONGOLEUM CORPORATION.
4. CONGOLEUM objects to these requests to the extent that they seek information or documents protected from discovery by the attorney/client, work product, or other privilege, or which are otherwise immune or protected from disclosure.
5. CONGOLEUM objects to these interrogatories, requests, instructions, and definitions to the extent that they seek discovery beyond that required by the Texas Rules of Civil Procedure.
6. CONGOLEUM objects to these requests to the extent that they seek to require it to provide documents other than those which may be obtained through a reasonably diligent search of its records.
7. CONGOLEUM objects to these requests to the extent that they seek to require it to gather and produce documents that are already a matter of public record.
8. CONGOLEUM objects to these requests to the extent that they seek to require it to produce any document which is equally as available to the Plaintiff as to CONGOLEUM.

9. CONGOLEUM objects to these requests to the extent that they seek information or documents which are not relevant to the subject matter of this litigation, or are not reasonably calculated to lead to the discovery of admissible evidence.
10. CONGOLEUM objects to these requests to the extent that they are ambiguous, vague, or otherwise incomprehensible.
11. CONGOLEUM objects to these requests to the extent that they are overbroad and fail to set forth with reasonable particularity the information or documents requested.
12. CONGOLEUM objects to these requests to the extent that they seek information which is unduly burdensome to obtain.
13. CONGOLEUM objects to these requests to the extent that they seek information which is confidential, proprietary, a trade secret, or otherwise non-public as to CONGOLEUM.
14. CONGOLEUM hereby adopts the motions and objections of the other Defendants, as well as those previously filed by this Defendant, and reserves the right to adopt their future motions and objections, relating to Plaintiffs' Master Interrogatories and Request for Production of Documents.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER: Donald Golemme; Risk Manager, Congoleum Corporation, P.O. Box 3127, Trenton, New Jersey 08619. Mr. Golemme has been employed by Congoleum Corporation since 1967.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER: Yes. The correct corporate name is Congoleum Corporation. It is incorporated in the State of Delaware. The entity authorized to accept service of process is Prentiss-Hall, 807 Brazos, Suite 102, Austin, Texas 78701. Congoleum Corporation is currently authorized to do business in the State of Texas.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

ANSWER: No.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER: Congoleum objects to this Interrogatory on the grounds it is overbroad in scope, irrelevant, at least in part, and not reasonably calculated to

lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds: Congoleum-Nairn, Inc. manufactured asphalt and vinyl asbestos tile, inlaid vinyl sheet goods, cushioned inlaid vinyl sheet goods, homogeneous vinyl sheet goods, chemically embossed cushioned vinyl flooring, and vinyl sheet flooring. Certain product lines in each of these product categories contained asbestos.

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER: Congoleum objects to this Interrogatory on the grounds it is overbroad in scope, unduly burdensome, and requests information which is, at least in part, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant incorporates by reference its answer to Interrogatory No. 4.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.
- B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.
- C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.
- F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

- G. The date asbestos was removed from such products, if ever, and the reasons therefor.
- H. A description of the physical appearance of each of the named products.
- I. A detailed description of the intended uses of the named products.
- J. Identify the last year that you sold each asbestos-containing product.

ANSWER:

(A, B) The products listed in response to Interrogatory No. 4 were manufactured, marketed, and/or sold by Congoleum-Nairn, Inc.

(C) The trade or brand names of each of the products manufactured, marketed and/or sold are listed in the Product Summary, attached hereto as Exhibit "A".

(D) Congoleum refers to its Product Summary attached hereto as Exhibit "A".

(E) Congoleum Corporation objects to this question on the grounds that it seeks confidential trade secret information. Without waiving this objection, Defendant responds that chrysotile asbestos was the only type of asbestos used in Congoleum-Nairn, Inc.'s flooring products.

Vinyl asbestos tile products were manufactured by mixing together, through a trade secret process, vinyl resins, plasticizers, fillers, binders, pigments, and asbestos. The mixture was formed into a sheet and cut into tiles.

Inlaid vinyl sheet goods consisted of a vinyl design and wear layer on a support web of felt sheet. The design and wear layer was manufactured by mixing together, through a trade secret process, vinyl resins, plasticizers, pigments, binders and fillers. During the relevant time period, the design and wear layer did not contain asbestos. The support sheet was manufactured by mixing together, through a trade secret process, asbestos, fillers and binders. The asbestos constituted 75% to 85% of the support sheet.

Cushioned inlaid vinyl sheet goods were manufactured in a fashion similar to inlaid vinyl sheet goods, except that there was an addition of a foam cushion layer. The design and wear layer and foam cushion layer did not contain asbestos. The support sheet was manufactured as set forth above.

Homogeneous vinyl sheet goods were of uniform composition manufactured by mixing together, through a trade secret process, vinyl resins, plasticizers, pigments, fillers, and asbestos. Homogeneous vinyl sheet goods also used a backing similar to the backing used for inlaid vinyl sheet goods.

Chemically embossed vinyl sheet goods contained four layers: a backing or support sheet, a foam cushion layer, a design layer, and a clear wear layer. The support sheet was manufactured as set forth above. The other layers did not contain asbestos.

Vinyl sheet flooring contained three layers: a backing or support sheet, a design layer, and a clear wear layer. The support sheet was manufactured as set forth above. The other layers did not contain asbestos.

(F) Congoleum refers to its Product Summary attached hereto as Exhibit "A".

(G) Congoleum refers to its Product Summary attached hereto as Exhibit "A".

(H) Congoleum objects to this interrogatory on the ground it is unduly burdensome. Subject to this objection, and without waiving same, Defendant refers to its response to Interrogatory No. 4 and its Product Summary.

(I) The products were intended to be used as flooring.

(J) Congoleum refers to its Answer to Interrogatory No. 6(f).

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER: Congoleum objects to the extent this Interrogatory is overbroad in scope. Subject to that objection, and without waiving same, it responds that the only documents that may exist which are responsive to this Interrogatory consist of product

literature, such as pattern books and related materials, which will be made available for review and inspection at the office of the undersigned counsel at a mutually convenient date and time.

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.
- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.
- C. The results of the tests.

ANSWER: Congoleum objects to this Interrogatory on the grounds it is overbroad in scope, unduly burdensome, and requests information which is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Congoleum further objects to the extent this Interrogatory implies that Congoleum's flooring products contained airborne asbestos fibers, which they did not. Subject to these objections, and without waiving same, Congoleum responds that it did not conduct any such tests.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: Not applicable.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: Not applicable.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the dates of such tests.
- B. The name, address, and job title of each person who conducted those tests.
- C. The results of those tests.
- D. Whether, as a result of the tests, any products were removed from the market.
- E. The names of all products removed from the market as a result of these tests.

ANSWER: Congoleum objects to this Interrogatory on the grounds that it is overbroad in scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Further, it is unduly burdensome, vague, and violates the attorney/client privilege and work product doctrines. Subject to these objections, and without waiving same, Congoleum responds that it has conducted all appropriate tests, including a test in 1975 to determine if installation or use of its flooring products complied with the then applicable OSHA standards for asbestos exposure. This test was supervised by M.J. Sendeki, and performed, in part, by Hugh Toal. The results of those tests were, in summary, but not by way of limitation:

1. There was no significant asbestos exposure to installers during the actual installation procedures;
2. There was no significant asbestos exposure to installers when removing flooring using the delamination technique;
3. There was asbestos exposure exceeding OSHA standards when using the technique of sanding residual felt backing.

Following the confirmation of those test results, letters were forwarded to all distributors and retailers in July 1975 warning of a potential danger of asbestos exposure from removing residual felt by sanding and instructing installers to use the delamination technique. Thereafter, these warnings and instructions were made part of the instruction manuals and literature regularly distributed to all distributors and retailers. No changes were made in Congoleum's floor coverings as a result of the test.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

- A. The name of each product.
- B. A description of each document and how it relates to each product.
- C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: Congoleum objects to this interrogatory as overbroad in scope, unduly burdensome, harassing, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds that warnings and installation instructions are contained in product literature, which are available for review and inspection at the office of the undersigned counsel.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 10 or 13? If the answer is affirmative, state:

- A. The names of the products changed or modified.
- B. The name, address, and job title of each person responsible for having made a change or modification.
- C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER: Congoleum Corporation objects on the grounds Interrogatory No. 13 is overbroad in scope, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Further, it invades the attorney/client and work product privileges, and further on the grounds that it requests information which is confidential, proprietary, a trade secret, or otherwise non-public as to Congoleum. Subject to these objections, and without waiving same, Defendant responds that in approximately 1976, Congoleum began an extensive development program which permitted the company to remove asbestos from all of its vinyl flooring between 1982 and 1984. Congoleum undertook the program in response to the growing public concern about asbestos, even though the public concern focused on the potential dangers of free respirable asbestos, and the asbestos in vinyl flooring is totally encapsulated and not respirable. These changes were not made as a result of the tests in question.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or [sic] any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.
- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.
- F. The name, address, and job title of each person responsible for having drafted or issued the warning.

- G. The current location of any such printed material and the custodian thereof.
- H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: Defendant objects to the extent this Interrogatory is overbroad in scope, unduly burdensome, and requests information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Congoleum responds:

A. Congoleum placed warnings, cautions, or special instructions on vinyl flooring products processed or sold by it.

B.,C.,E. (1) In 1975, the following warning was placed on Congoleum products: "SOME RESILIENT FLOOR COVERINGS AND MOST FELT BACKINGS CONTAIN ASBESTOS FIBERS. WHEN REMOVING OR COVERING OVER SUCH FLOOR COVERING, UNDER NO CIRCUMSTANCES SHOULD IT BE SANDED. SUCH SANDING OF ASBESTOS-CONTAINING MATERIAL CAN PLACE FINE PARTICLES OF ASBESTOS IN THE AIR WHICH COULD CAUSE SERIOUS BODILY HARM."

(2) In 1985, the following warning was placed on Congoleum products: "WARNING. DO NOT SAND EXISTING RESILIENT FLOORING, BACKING OR LINING FELT. THESE PRODUCTS MAY CONTAIN ASBESTOS FIBERS THAT ARE NOT READILY IDENTIFIABLE. SANDING OF ASBESTOS-CONTAINING MATERIAL CAN PLACE FINE PARTICLES OF ASBESTOS IN THE AIR. THESE ASBESTOS PARTICLES, IF INHALED, MAY CAUSE SERIOUS BODILY HARM."

(3) In 1988, the following warning was placed on Congoleum products: "WARNING. Do not sand, grind, abrade, dryscrape, beadblast, or mechanically pulverize existing resilient flooring, backing, or lining felt. These products may contain asbestos fibers which are not readily identifiable. Using the above non-recommended procedures on asbestos-containing material can place fine particles in the air. These particles, if inhaled, may cause serious bodily harm. Smoking significantly increases the risk of serious bodily harm."

(4) In 1989, the following warning was placed on Congoleum products: "WARNING. DO NOT SAND, DRYSCRAPE, BEADBLAST OR MECHANICALLY PULVERIZE EXISTING RESILIENT FLOORING, BACKING OR LINING FELT. THESE PRODUCTS MAY CONTAIN ASBESTOS FIBERS WHICH ARE NOT READILY IDENTIFIABLE. USING THE ABOVE NON-RECOMMENDED PROCEDURES ON ASBESTOS-CONTAINING MATERIAL CAN CREATE ASBESTOS DUST. THE INHALATION OF ASBESTOS MAY CAUSE ASBESTOSIS OR OTHER SERIOUS BODILY HARM. SMOKING GREATLY INCREASES THE RISK OF SERIOUS BODILY HARM."

D. Congoleum enclosed installation sheets with the warnings set out above in the packaging of each roll or box of product. The letters and brochures were distributed as such.

F. Numerous people were consulted, including Michael Sapienza, Group Director of Quality, Testing, Installation and Development; Robert Aspy, Marketing Manager; Michael Pomianoski, Marketing General Manager; S. Arthur Giddings, Vice President of Research; and Donald Golemme, Risk Manager. The address for each of the individuals is 861 Sloan Avenue, Hamilton Township, Trenton, New Jersey 08619. Also consulted was Frank McKinney, retired, former Senior Vice President of Sales and Marketing, who it is believed now resides in Arkansas, and Harry F. Pearson, former President.

G.,H. Copies of such printed material, to the extent it is available, will be produced for inspection at the office of the undersigned counsel at a mutually convenient date and time.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Dallas County, Texas, is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.
- B. The date of notice of each claim.
- C. A description of the claim.
- D. The type of injuries allegedly sustained.
- E. The name and address of each attorney who represents each individual making a claim.
- F. The style and court number of each claim.
- G. The disposition of each claim that has been settled or taken to judgment.

ANSWER: No.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER: Congoleum Nairn, Inc. distributed its flooring products to wholesale distributors, who in turn sold to retail outlets, who in turn sold to consumers. Defendant objects to listing all distributors to whom it has sold as such request is overbroad in scope and requests information which is irrelevant to this litigation, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds: Refer to Answer to Interrogatory No. 17.

INTERROGATORY NO. 17:

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas, and Virginia? If so, state:

- A. The name and address of each such distributor or sales representatives.
- B. The years in which such company or person distributed, marketed, or sold your products.
- C. What products were distributed, marketed, or sold and in what years.

ANSWER: Defendant objects to this interrogatory as overbroad in scope and requesting information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Congoleum specifically objects to providing information as to distributors after 1983; after that date, Congoleum discontinued manufacturing or distributing any asbestos-containing products. Subject to these objections, and without waiving same, Defendant responds:

ALABAMA DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1956: Peaslee-Gaulbert Corp.
1312 1st Ave. N.
Birmingham, AL

McGowin-Lyons Hardware & Supply Co.
133 N. Water St.
Mobile, AL

Loeb Hardware Co. Inc.
120-122 Commerce St.
Montgomery, AL

1957: Peaslee-Gaulbert Corp.
Birmingham, AL

McGowin-Lyons Hardware & Supply Co.
Mobile, AL

Allison-Erwin
Montgomery, AL

1958: Same as '57 (Allison-Erwin changes name to
Johnston-Erwin)

1959-1963: Air Engineers Inc.
Birmingham, AL

McGowin-Lyons Hardware & Supply Co.
Mobile, AL

Teague Hardware
Montgomery, AL

1964-1970: McGowin-Lyons Hardware & Supply Co.
Mobile, AL

Teague Hardware
Montgomery, AL

Garrett-Albright Inc.
3016 8th Ave. North
Birmingham, AL

1971-1972: Garrett-Albright Inc.
Birmingham, AL

Teague Hardware
Montgomery, AL

1973: Teague Hardware
Montgomery, AL

1974-1983: Teague Hardware
Montgomery, AL

Stratton-Baldwin & Co.
1315 St. Stephens Rd.
Mobile, AL

FLORIDA DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1966: F.T. Kelly Co.
2300 Hubbard St.
Jacksonville, FL

1967-1970: F.T. Kelly Co.
Jacksonville, FL

Walton Wholesale Corp.
7110 N.E. 4th St.
Miami, FL

1971-1975: Atlantic Distributors
P.O. Box 15026
Tampa, FL

1976-1983: L.D. Brinkman & Co.
P.O. Box 15026
Tampa, FL

MISSISSIPPI DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1958: Stratton-Warren Hardware Co.
Jackson, MS

1959-1962: Stratton-Warren Hardware Co.
Jackson, MS

Orgill Bros. Hardware Co.
Jackson, MS

1963-1967: Stratton-Warren Hardware Co.
Jackson, MS

1968: Martin-Scott Flooring Supply Co., Inc.
429 So. Gallatin St.
Jackson, MS 39203

1969: Gibson Flooring & Supply Inc.
429 So. Gallatin St.
Jackson, MS 39203

1970-1983: Orgill Bros. & Co.
301 W. Pearl St.
P.O. Box 2930
Jackson, MS 39207

OREGON DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1958: Murray B. Marsh Co., Inc.
1810 W. Harbor Dr.
Portland, OR

Marshall-Wells Co.
P.O. Box 4200
Portland, OR

1959: Murray B. Marsh
Portland, OR

Pacific Yard Service
401 1st Ave. South
Eugene, OR

1960-1961: Pacific Yard Service
Eugene, OR

Wanke Panel Co.
2204 N. Clark Ave.
Portland, OR

1962-1983: Wanke Panel Co.
Portland, OR

WASHINGTON DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1958: Murray B. Marsh Co., Inc.
2030 8th Ave.
Seattle, WA

Marshall-Wells Co.
P.O. Box 3311
Seattle, WA

1959: Murray B. Marsh
Seattle, WA

Schwabacher Hardware Co.
Seattle, WA

Building Supplies
Spokane, WA

1960-1961: Sunset Electric Co.
Spokane, WA

Fidelity Electric Co.
Seattle, WA

Schwabacher Hardware Co.
Seattle, WA

1962-1969: Sunset Electric Co.
Spokane, WA

Schwabacher Hardware Co.
Seattle, WA

1970-1983: Cascade Sales of N.W.
4600 Utah Ave. S.
Helena, WA

Sunset Electric Co.
Spokane, WA

GEORGIA DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1955: Albany Hardware Co.
419 Hodges Ave.
Albany, GA

Peaslee-Gaulbert Corp.
300 Peters St., S.W.
Atlanta, GA

Rosenfeld Co.
221 Ivy St. N.E.
Atlanta, GA

1956-1957: Allison-Erwin Co.
Atlanta, GA

1958: Johnston-Erwin Co.
Atlanta, GA

1959: Albany Hardware Co.
Atlanta, GA

Johnston Dist. Co.
Atlanta, GA

Jernigan Hardware Co.
918-924 Walker St.
Augusta, GA

Peeler Hardware Co.
6th & Poplar
Macon, GA

Charles B. Martin Dist. Co.
Savannah, GA

1960-1961: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
1088 Huff Rd.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

Peeler Hardware Co.
Macon, GA

1962-1968: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

Peeler Hardware Co.
Macon, GA

F.T. Kelly
477 W. Boundry St.
Savannah, GA

1969: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

Peeler Hardware Co.
Macon, GA

F.T. Kelly
Savannah, GA

Southern Wholesale Flooring Co.
Albany, GA

1970: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

Peeler Hardware Co.
Macon, GA

F.T. Kelly
Savannah, GA

Southern Wholesale Flooring Co.
Albany, GA

Genuine Parts Co.
7260 Delta Circle
Atlanta, GA

1971: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

Peeler Hardware Co.
Macon, GA

F.T. Kelly
Savannah, GA

Southern Wholesale Flooring Co.
Albany, GA

Genuine Parts Co.
Atlanta, GA

Altantic Dist. of Savannah
477 W. Boundry St.
Savannah, GA

1972: Albany Hardware Co.
Atlanta, GA

Stan Rich Co.
Atlanta, GA

Jernigan Hardware Co.
Augusta, GA

F.T. Kelly
Savannah, GA

Southern Wholesale Flooring Co.
Albany, GA

Genuine Parts Co.
Atlanta, GA

Atlantic Dist. of Savannah
Savannah, GA

1973-1975: Albany Hardware
Albany, GA

Southern Wholesale Flooring Co.
Albany, GA

Atlantic Dist. of Savannah
Savannah, GA

Beck & Gregg Ind.
7260 Delta Circle
Atlanta, GA

1976-1977: Albany Hardware
Albany, GA

Southern Wholesale Flooring Co.
Albany, GA

Beck & Gregg Ind.
Atlanta, GA

L.D. Brinkman & Co.
760 D. King George Blvd.
Savannah, GA

1978: Albany Hardware
Albany, GA

Beck & Gregg Ind.
Atlanta, GA

L.D. Brinkman & Co.
Savannah, GA

1979-1982: Beck & Gregg Ind.
Atlanta, GA

L.D. Brinkman & Co.
Savannah, GA

1983: L.D. Brinkman & Co.
Savannah, GA

TENNESSEE DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952: Chattanooga Paper & Woodenware Co.
Main & Williams
Chattanooga, TN

C.M. McClung & Co. Inc.
510 W. Jackson Blvd.
Knoxville, TN

Peaslee-Gaulbert Corp.
243 Jefferson Ave.
Memphis, TN

Stratton-Warren Hardware Co.
Memphis, TN

Keith Simmons Co.
13 Cummings Station
Nashville, TN

1953-1955: Chattanooga Paper & Woodenware Co.
Chattanooga, TN

C.M. McClung & Co. Inc.
Knoxville, TN

Peaslee-Gaulbert Corp.
Memphis, TN

Stratton-Warren Hardware Co.
Memphis, TN

Keith Simmons Co.
Nashville, TN

Woodenware Co.
Chattanooga, TN

1956-1958: C.M. McClung & Co. Inc.
Chattanooga, TN

Peaslee-Gaulbert Corp.
Memphis, TN

Stratton-Warren Hardware Co.
Memphis, TN

Keith Simmons Co.
Nashville, TN

1959-1971: C.M. McClung & Co. Inc.
Chattanooga, TN

Orgill Bros.
2100 Latham
Memphis, TN

Stratton-Warren Hardware Co.
Memphis, TN

Keith Simmons Co.
Nashville, TN

1972-1980: Orgill Bros.
Memphis, TN

Stratton-Warren Hardware Co.
Memphis, TN

Keith Simmons Co.
Nashville, TN

1981-1983: Orgill Bros.
Memphis, TN

Keith Simmons Co.
Nashville, TN

TEXAS DISTRIBUTION 1952 - 1983:
(Prior information is not available)

1952: Morrow-Thomas Hardware Co.
Amarillo, TX

Peaslee-Gaulbert Corp.
2700 Canton St.
Dallas, TX

The Shoellkopf Co. Ltd.
P.O. Box 5358
Dallas, TX

Momsen-Dunnegan-Ryan Co.
Houston, TX

Brinton & Co.
1505 Gentry St.
Houston, TX

1953-1954: Morrow-Thomas Hardware Co.
Amarillo, TX

Peaslee-Gaulbert Corp.
Dallas, TX

The Shoellkopf Co. Ltd.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
Houston, TX

Brinton & Co.
Houston, TX

Carpenter Paper Co.
Harlingen, TX

1955: Morrow-Thomas
Amarillo, TX

Peaslee-Gaulbert Corp.
Dallas, TX

Brinton & Co.
Houston, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Medaris Co. Inc.
Dallas, TX

1956-1957: Morrow-Thomas
Amarillo, TX

Peaslee-Gaulbert Corp.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Medaris Co. Inc.
Dallas, TX

1958: Morrow-Thomas
Amarillo, TX

Peaslee-Gaulbert Corp.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Medaris Co. Inc.
Dallas, TX

Sun Appliance & Electric
741 North 5th St.
Abilene, TX

Wilson Dist. Co.
San Antonio, TX

1959: Morrow-Thomas
Amarillo, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Medaris Co. Inc.
Dallas, TX

Sun Appliance & Electric
Abilene, TX

Wilson Dist. Co.
San Antonio, TX

1960:

Morrow-Thomas
Amarillo, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Medaris Co. Inc.
Dallas, TX

Sun Appliance & Electric
Abilene, TX

Wilson Dist. Co.
San Antonio, TX

Bakoring Inc.
Houston, TX

1961-1962:

Sun Appliance & Electric
Abilene, TX

Morrow-Thomas Hardware Co.
Amarillo, TX

Wilson Dist. Co.
San Antonio, TX

L.D. Brinkman & Co.
P.O. Box 47586
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Bakoring Inc.
Houston, TX

1963-1964: Sun Appliance & Electric
Abilene, TX

Morrow-Thomas Hardware Co.
Amarillo, TX

Wilson Dist. Co.
San Antonio, TX

L.D. Brinkman & Co.
P.O. Box 47586
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Bakoring Inc.
Houston, TX

David C. Campbell Co. Inc.
109 Labbranch St.
Houston, TX

1965: Sun Appliance & Electric
Abilene, TX

Morrow-Thomas Hardware Co.
Amarillo, TX

Wilson Dist. Co.
San Antonio, TX

L.D. Brinkman & Co.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Bakoring Inc.
Houston, TX

David C. Campbell Co. Inc.
Houston, TX

Stryco Sales
151 N. Lee St.
El Paso, TX

Central Dist. Co.
724 N. San Marcos
San Antonio, TX

1966-1967: Sun Appliance & Electric
Abilene, TX

Morrow-Thomas Hardware Co.
Amarillo, TX

Wilson Dist. Co.
San Antonio, TX

L.D. Brinkman & Co.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Bakoring Inc.
Houston, TX

David C. Campbell Co. Inc.
Houston, TX

1968: Morrow-Thomas Hardware Co.
Amarillo, TX

Wilson Dist. Co.
San Antonio, TX

L.D. Brinkman & Co.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
El Paso, TX

Bakoring Inc.
Houston, TX

David C. Campbell Co. Inc.
Houston, TX

1969-1973: L.D. Brinkman & Co.
Dallas, TX

Momsen-Dunnegan-Ryan Co.
Houston, TX

Central Dist. Co.
San Antonio, TX

1974-1975: L.D. Brinkman & Co.
Dallas, TX

Central Dist. Co.
San Antonio, TX

1976-1983: L.D. Brinkman & Co.
Dallas, TX

Central Dist. Co.
San Antonio, TX

The Stephens Co.
6415 Allegheny
Houston, TX

VIRGINIA DISTRIBUTION 1952 - 1983:
(Prior information not available)

1952-1959: Williams & Reed Inc.
238 Court St.
Norfolk, VA

Richmond Hardware Co.
Roseneath Rd. & Leigh St.
Richmond, VA

Hix-Palmer Co. Inc.
302-306 Salem Ave.
Roanoke, VA

Boyer Dist. Co.
Woodstock, VA

1960-1961: Cuthrell's Inc.
Norfolk, VA

Richmond Hardware Co.
Richmond, VA

Williams & Reed Inc.
Richmond, VA

Bluefield Hardware Co.
Roanoke, VA

J. Carroll Boyer, Inc.
Woodstock, VA

1962-1964: Cuthrell's Inc.
Norfolk, VA

Williams & Reed Inc.
Richmond, VA

Bluefield Hardware Co.
Roanoke, VA

J. Carroll Boyer, Inc.
Woodstock, VA

Thomas E. Dickerson Co.
Richmond, VA

1965-1966: Cuthrell's Inc.
Norfolk, VA

Williams & Reed Inc.
Richmond, VA

J. Carroll Boyer, Inc.
Woodstock, VA

Thomas E. Dickerson Co.
Richmond, VA

Hafo Dist.
2026 Salem Ave. S.W.
Roanoke, VA

1967-1968: Cuthrell's Inc.
Norfolk, VA

Williams & Reed Inc.
Norfolk, VA

Linoleum Dist.
10th & Canal
Richmond, VA

Woody Dist. Inc.
1122 Rockland Avenue N.W.
Roanoke, VA

1969-1970: Cuthrell's Inc.
Norfolk, VA

Williams & Reed Inc.
Norfolk, VA

Woody Dist. Inc.
Roanoke, VA

1971-1975: Hillsman Co. Inc.
2107 Loumour Ave.
Richmond, VA

Woody Dist. Inc.
Roanoke, VA

1976-1983: Woody Dist. Inc.
Roanoke, VA

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: Defendant Congoleum objects on the grounds this interrogatory is overbroad in scope and requests information which is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections and without waiving same, Congoleum responds that to the extent Congoleum had any persons with this function, their function was either related to employee testing or unrelated to the presence of asbestos in Congoleum's facilities and offices.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.
- B. The date of publication and the names of the author and publisher (if any).
- C. The date received by Defendant, if known.
- D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER: Congoleum objects to the extent this interrogatory is overbroad in scope, unduly burdensome, violates the attorney-client and work product doctrines and is irrelevant and not

reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds that product literature prepared and distributed by Congoleum contain the warnings set out in Answer to Interrogatory No. 14 above, and are available for review and inspection at the office of the undersigned counsel at a mutually convenient date and time. Also available for review and inspection are the Resilient Floor Covering Institute report. Any other documents which may be responsive to this Interrogatory, and which are not subject to privilege, are located at the business offices of Congoleum Corporation in Trenton, New Jersey.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each such association or organization.
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.
- D. Whether any of those publications are still in your possession, and if so:
 1. A description of the publications, including the date.
 2. The current location of such publications.
 3. The custodian of such publications.
 4. The method or manner in which such publications are maintained.

ANSWER:

A.,B. Congoleum objects on the grounds this Interrogatory is overbroad in scope, and requests information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Congoleum responds that it has participated in the Resilient Floor Covering Institute ("RFCI") from December 1975 to

September 1980, and February 1987 to present. The RFCI is located at 966 Hungerford Drive, Suite 12B, Rockville, Maryland 20850. Participation included membership on the board of directors and the technical affairs committee. Persons who have participated include:

Michael A. Sapienza, Group Director of Quality, Testing, Installation and Development;

R. Sturdevant, former Vice President, Deceased;

W. Powell, Consultant and former Quality Manager;

J. Stetson, former Vice President, Deceased;

S. Feller, former Chemist;

L. Haemer, Consultant, former Installation Department Manager;

R. Bennett, former President;

F. McKinney, former Senior Vice President of Sales and Marketing;

Leonard Franckowiak, Senior Vice President of Manufacturing.

Congoleum participated in the Asbestos Information Association ("AIA") from 1972 until February 24, 1984. The AIA was located at 1745 Jefferson Davis Highway, Crystal Square 4, Suite 509, Arlington, Virginia 22202. Participation included membership on the executive and technical committees. Persons who participated included:

Robert Rucker, Manager of Environmental Protection and Occupational Safety and Health;

Nicholas DeCandia, Vice President of Manufacturing;

Martin J. Sendeki, former Manager of Environmental Protection;

Fraser Morton, Chemist.

C.,D. The only documents responsive to this Interrogatory will be produced in response to Interrogatory No. 19.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER: Congoleum objects on the grounds this interrogatory is overbroad in scope, unduly burdensome, and requests information which is irrelevant to this litigation, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds that vinyl asbestos tile products were manufactured at Kearny, New Jersey. Inlaid vinyl sheet goods were manufactured in Wilmington, Delaware and Trenton, New Jersey. Other vinyl sheet goods were manufactured in Trenton, New Jersey and Marcus Hook, Pennsylvania. The backing or support sheets were manufactured in Finksburg, Maryland.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

- A. The name, address, and job title of each person or entity who prepared such materials.
- B. The name, address, and job title of each person who currently has possession of such materials and their present location.
- C. The date the materials were prepared.
- D. The media used to disseminate the sales materials.

ANSWER: Defendant Congoleum objects to the extent this interrogatory is overbroad in scope, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds: Documents responsive to this interrogatory are available for review and inspection at the office of the undersigned counsel at a mutually convenient date and time.

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.

- B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.
- D. The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER: Defendant Congoleum objects to the extent this interrogatory is overbroad in scope, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving same, Defendant responds: Documents responsive to this interrogatory are available for review and inspection at the office of the undersigned counsel at a mutually convenient date and time.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER: See Exhibit "B" attached.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant became aware of the existence of the disease.
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: Congoleum Corporation objects to Interrogatory No. 25 as same is overly broad, and requests information which is in part irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds this Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of pulmonary disorders. Further, this Defendant would defer to the judgment and opinions of its medical expert witnesses on questions of human diseases, their causes, and diagnoses. Subject to these objections, and without waiving same, Defendant responds that it became generally aware of the environmental effort directed at asbestos-containing products in approximately 1973-1975. Congoleum was the first manufacturer of asbestos-containing flooring to issue warnings, which it did in 1975.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.

- F. Who is the custodian of such information.
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: Congoleum Corporation objects to Interrogatory No. 26 as same is overly broad, and requests information which is in part irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds this Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of lung cancer. Further, this Defendant would defer to the judgment and opinions of its medical expert witnesses on questions of human diseases, their causes, and diagnoses. Subject to these objections, and without waiving same, Defendant responds that it became generally aware of the environmental effort directed at asbestos-containing products in approximately 1973-1975. Congoleum was the first manufacturer of asbestos-containing flooring to issue warnings, which it did in 1975.

INTERROGATORY NO. 27:

As to pleural disease, pleural thickening or pleural plaques, state:

- A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.
- B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

F. Who is the custodian of such information.

ANSWER: Congoleum Corporation objects to Interrogatory No. 27 as same is overly broad, and requests information which is in part irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds this Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of pleural disease, pleural thickening or pleural plaques. Further, this Defendant would defer to the judgment and opinions of its medical expert witnesses on questions of human diseases, their causes, and diagnoses. Subject to these objections, and without waiving same, Defendant responds that it became generally aware of the environmental effort directed at asbestos-containing products in approximately 1973-1975. Congoleum was the first manufacturer of asbestos-containing flooring to issue warnings, which it did in 1975.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.
- B. The date on which Defendant first received knowledge that mesothelioma was caused by inhalation of asbestos dust and fibers.
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.
- H. Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER: Congoleum Corporation objects to Interrogatory No. 28 as same is overly broad, and requests information which is in part irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Further, this Defendant would defer to the judgment and opinions of its medical expert witnesses on questions of human diseases, their causes, and diagnoses. Subject to these objections, and without waiving same, Defendant responds that it became generally aware of the environmental effort directed at asbestos-containing products in approximately 1973-1975. Congoleum was the first manufacturer of asbestos-containing flooring to issue warnings, which it did in 1975.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

- A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.
- B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?
- C. The date on which Defendant first received knowledge that these other cancers were caused by asbestos inhalation.
- D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.
- E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.
- F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.
- G. Who is the custodian of such information.

ANSWER: Congoleum Corporation objects to Interrogatory No. 29 as same is overly broad, and requests information which is in part irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds this Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos

exposure can result in the development of forms of cancer such as those listed. Further, this Defendant would defer to the judgment and opinions of its medical expert witnesses on questions of human diseases, their causes, and diagnoses. Subject to these objections, and without waiving same, Defendant responds that it became generally aware of the environmental effort directed at asbestos-containing products in approximately 1973-1975. Congoleum was the first manufacturer of asbestos-containing flooring to issue warnings, which it did in 1975.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER: In manufacturing flooring, the heat and pressure to which the asbestos is subjected causes the resins to completely encapsulate the materials, including the asbestos fibers. The encapsulation changes the biological properties of the asbestos so that it becomes biologically inactive and the inhalation of encapsulated asbestos fibers cannot cause asbestos-related disease. OSHA has always recognized that encapsulated asbestos fibers such as those in Congoleum's flooring are non-friable and are not a health hazard. From OSHA's first promulgation of regulations requiring permissible levels of exposure to asbestos and warning requirements, to the present, OSHA has always exempted from any regulatory compliance, including the warning label requirement, any product in which asbestos fibers have been encapsulated to the extent that no airborne concentrations of asbestos fibers in excess of the OSHA exposure limits will be released. This exemption is applicable to Congoleum's flooring. The Environmental Protection Agency recently also determined that encapsulated asbestos products such as flooring are non-friable products and gave a regulatory exemption. Any asbestos fibers in flooring adhesives used to apply flooring are also fully encapsulated and, like the encapsulated asbestos fibers in the flooring, do not create a health hazard if emitted.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of

package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER: Congoleum Corporation objects to the extent this Interrogatory is overbroad in scope and requests information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections and without waiving same, Defendant refers to its catalog, which is available for inspection at the office of the undersigned counsel.

INTERROGATORY NO. 32:

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

- A. The name of the company manufacturing the asbestos products.
- B. The trade name affixed to those products.
- C. The periods of time covered by each such agreement.
- D. The volume, in dollar amount, of each transaction.
- E. The initial purchaser of the products.

ANSWER: No.

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER: Congoleum does not know the source of asbestos used during the relevant time period, but based on reasonable belief, Congoleum responds that its primary sources of asbestos were Canadian Johns-Manville Asbestos Ltd., P. O. Box 1500, Asbestos, Quebec, Canada; Carey Canada, Inc., P. O. Box 190, East Broughton Station, Quebec, Canada GON 1H0; Lac D'Amiante Du Quebec Ltd., 120 Broadway, New York, New York 10005.

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessor [sic] currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- A. The name, address, and job title of each person having custody of each of those documents and their current location.
- B. A brief description of each such document, including the dates and the parties signatory.

ANSWER: Not applicable.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: No.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting.

- B. The general subject matter discussed at each meeting.
- C. Who was in attendance at each meeting.
- D. Where and by whom the written minutes are presently maintained.
- E. By whom the minutes were taken and put into final format.
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: No.

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.
- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER: No.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: Congoleum sold to distributors, who in turn sold to retailers, who sold to the public. Accordingly, no documents are available relating to shipments of asbestos-containing products, other than to distributors.

INTERROGATORY NO. 39:

May you call company representatives as witnesses at the trial of any of these cases? If so, list:

- A. The name, address, and job title of each company representative who may be called.
- B. A summary of the testimony expected to be given by each such witness.
- C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER: Congoleum objects to this interrogatory on the grounds that it calls for the disclosure of work product and attorney-client thought processes as to which company representatives it may call as a witness in this case. Subject

to these objections, and without waiving same, Defendant responds that such information, when it is determined, will be supplemented.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

- A. Full and correct name;
- B. Principal place of business;
- C. State of incorporation;
- D. Date of acquisition by Defendant;
- E. Whether or not the business entity was ever authorized to transact business in the State of Texas.

ANSWER: Congoleum Corporation (Congoleum) is a manufacturer of resilient flooring materials. In 1984, a corporation different from Congoleum was organized under the name Congoleum Corporation (hereinafter referred to as 1984 Congoleum). At that time, Congoleum was an operating division of 1984 Congoleum, known as the Resilient Flooring Division. In 1984, Congoleum had other operating divisions and subsidiaries which carried on businesses other than the resilient flooring business. On March 31, 1986, 1984 Congoleum incorporated a wholly owned subsidiary, Resilco, Inc. On April 16, 1986, 1984 Congoleum transferred to Resilco, Inc. all the assets of its Resilient Flooring Division.

On or before April 29, 1986, 1984 Congoleum transferred the stock of Resilco, Inc. to its parent, Congoleum Industries, Inc. 1984 Congoleum merged into an independent subsidiary named Bath Iron Works Corporation, with Bath Iron Works Corporation being the surviving entity. Resilco, Inc. changed its name to Congoleum Corporation. Thus, by April 19, 1986, Congoleum was a wholly owned subsidiary of Congoleum Industries, Inc., owning and operating the resilient flooring business.

On August 20, 1986, the current corporate parent of Congoleum acquired it by causing a newly formed subsidiary called Resilient Acquisitions, Inc., to merge into Congoleum, as a result of which all of the stock of Congoleum was acquired by its

current parent. Congoleum Industries, Inc., which by then had changed its name to BIW Industries, Inc., ceased to own any stock of Congoleum.

Furthermore, in 1984, 1980, 1968, and 1959, several significant purchases, sells, and reorganizations, transferred ownership of the flooring operations among various entities.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER: Yes.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER: Congoleum objects to this interrogatory to the extent it calls for speculation as to who the ultimate or foreseeable users are or were. Subject to this objection, and without waiving same, Defendant responds that Congoleum distributed its flooring products to wholesale distributors, who in turn sold to retail outlets, who in turn sold to consumers. Such foreseeable consumers include floor tile mechanics.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.

B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.

ANSWER: Yes. In further answer, Congoleum incorporates by reference its response to Interrogatory No. 30.

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER: Defendant objects to Interrogatory No. 44 on the ground it calls for speculation. Subject to this objection, and without waiving same, Defendant responds that it is up to the consumer whether to replace flooring materials. Congoleum flooring products are extremely durable and maintenance-free. If a consumer wishes to update or change flooring, new flooring materials can be installed over the old flooring.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: No.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER: Assuming this Interrogatory refers to the information requested in Interrogatory No. 45, Defendant responds: Not applicable.

INTERROGATORY NO. 47:

Has your company or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- A. Name of the person or firm conducting such studies;
- B. The date the studies began and the date they were completed;
- C. Any publication or other written dissemination of the results of the studies;
- D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

ANSWER: Congoleum refers to its Objections and Answer to Interrogatory No. 11, and incorporates same by specific reference.

INTERROGATORY NO. 48:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

- A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
- B. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?
- C. State in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER: Congoleum objects to this Interrogatory on the ground same is overbroad in scope and not sufficiently limited in time or to asbestos products. Subject to this objection, and without waiving same, Defendant responds that it has had a Technical Operations Center which participates in the development of flooring products. There are no feasible means or methods for this Defendant to determine the information requested in subparts B and C.

INTERROGATORY NO. 49:

Does your company have, or has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;
- B. Whether or not such Medical Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department.

ANSWER: Defendant Congoleum objects on the grounds this interrogatory is overbroad in scope and requests information which is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections and without waiving same, Congoleum responds that to the extent Congoleum had a medical department, its function was either related to employee testing or unrelated to the presence of asbestos in Congoleum's facilities and offices.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s) and year said warning was first applied.

ANSWER: Congoleum incorporates by specific reference its objections and answer to Interrogatory no. 14.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER: No, not applicable.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER: Congoleum discontinued manufacturing and marketing any products containing asbestos in 1983. Please refer to the Product Summary, Exhibit "A", for dates on which asbestos was removed from specific products.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- C. The dates of recall;
- D. The purpose for the recall.

ANSWER: No.

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER: Congoleum objects to this Interrogatory on the grounds it is vague, ambiguous and overbroad in scope. Whether Congoleum flooring can be substituted depends on the customer's specifications. In further answer, without waiving its

objections, Congoleum refers to its Product Summary, attached hereto as Exhibit "A", for those products which contained asbestos and the dates they were available.

INTERROGATORY NO. 55:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER: Not applicable.

INTERROGATORY NO. 56:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER: Congoleum objects to this Interrogatory on the grounds it is overbroad in scope, and requests information which is or may be irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, Defendant incorporates by specific reference its objections and answer to Interrogatory No. 11.

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.

ANSWER: Without waiving its general objections, Congoleum responds that it lacks documents or other information that would indicate whether such information was provided or received.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 63 for total dust, and not asbestos dust alone?

ANSWER: Not applicable.

INTERROGATORY NO. 59:

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

ANSWER: Congoleum objects to this Interrogatory on the grounds it is overbroad in scope, and requests information which is or may be irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and without waiving same, Defendant incorporates by specific reference its objections and answer to Interrogatory No. 11.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- (a) The name, address, and job classification of each such expert 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 and a summary of the grounds for each opinion;
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above;

- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER: Defendant objects on the grounds that this Interrogatory is overly broad, unduly burdensome and harassing. This Defendant does not know nor have possession or custody of the information requested in section (f). Notwithstanding those objections, the following individuals may be used as expert witnesses:

(a) Dr. Elvin Adams, General Conference of SDA's, 6840 Eastern Avenue, N.W., Washington, D.C. 20012.

Dr. Oscar Auerbach, 158 Long Hills Drive, Short Hills, NJ 07078;

Dr. Stephen Ayers, Sanger Hall, Room 1-014, Box 565, MCV Station, Richmond, VA 23298-0001;

Kenneth J. Boudreaux, Ph.D., Consulting Economist, A.B. Freeman School of Business, Tulane University, 1424 Bordeaux, New Orleans, Louisiana 70115;

Dr. Sam Cade, Jr., Radiology Department, Baylor University Medical Center, 3500 Gaston Ave., Dallas, TX 75242;

Dr. Edwin Cadman, M.D., University School of Medicine, 333 Cedar Street, New Haven, CT 06510;

Dr. Phillip Cagle, 6565 Fannin, MS 205, Houston, Texas 77030;

Andrew Churg, M.D., The University of British Columbia, 2211 Wesbrook Mall, Vancouver, B.C., Canada V6T1W5, (604) 228-7111;

Dr. Joseph Cimino, New York Medical College, 50 Willard Avenue, North Tarryton, NY 10591;

Dr. Bobby F. Craft, Industrial Health, Inc., 640 East Wilmington Avenue, Salt Lake City, Utah 84106.

John E. Craighead, M.D., Pathology Department, University of Vermont, Burlington, VT 05401;

Dr. George Delclos, Pulmonary Consultants, 6550 Fannin, Smith Tower, Suite 2403, Houston, TX 77030;

Dr. Harry Demopoulos, 550 First Avenue, New York, NY 10016;

Dr. Scott R. Donaldson, North Texas Pulmonary Associates,
375 Municipal Drive, Suite 140, Richardson, TX 75080, (214) 680-
0666;

Dr. Gregory Foster, North Texas Pulmonary Associates, 375
Municipal Drive, Suite 140, Richardson, TX 75080;

Dr. Edward A. Gaensler, Boston University Medical Center, 80
East Concord Street, Boston, Massachusetts 02118.

Dr. Joe G.N. Garcia, Department of Medicine, Wilshard
Memorial Hospital, Indianapolis, Indiana 46202;

Dr. Milton Gray, 521 Crestbend, Houston, Texas;

Dr. Donald Greenburg, The Methodist Hospital, Department of
Pathology, 6565 Fannin, 2nd Floor, Houston, Texas 77030;

Dr. Peter Heidbrink, Southwest Pulmonary Associates, St.
Paul Professional Building #2, 5959 Harry Hines Boulevard, Suite
711, Dallas, TX 75235;

Dr. Michael D. Henderson, 330 Rittiman Road, San Antonio,
Texas 78209;

Elliott Hinkes, M.D., 301 N. Prairie Avenue, Suite 311,
Inglewood, CA 90301;

Dr. H. Corwin Hinshaw, 450 Sutter Street, San Francisco, CA;

Gerald Kerby, M.D., Pulmonary Specialist, University of
Kansas Medical Center, 3900 Cambridge, Kansas City, KS 66103;

B.K. Kwon,

Dr. Jeffrey S. Lee, Building 512, University of Utah, Salt
Lake City, Utah 84112.

James E. Lockey, M.D., M.S., Institute of Environmental
Health, University of Cincinnati Medical Center, Clinical Studies
Division 5251 Medical Science Building, M.L. 182, 231 Bethesda
Avenue, Cincinnati, Ohio 45267-0182;

Dr. Forde A. McIver, Pathology Associates, P.A., 135
Rutledge Avenue, Charleston, South Carolina 29401.

Dr. Joseph M. Miller, Box 365, New Hampton, New Hampshire.

Dr. William K.C. Morgan, University Hospital, University of
Western Ontario, P.O. Box 5339, Postal Station A, London, Ontario
N6A 5 A5;

Robert M. O'Neal, M.D., The University of Mississippi Medical Center, 2500 N. State St., Jackson, MS 39216-4505;

A. Mitchell Polinsky, Stanford University, Professor of Law and Economics, Crown Quadrangle, Stanford, CA 94306-8610;

Bill Powell,

Dr. Lee B. Reichman, University of Medicine, New Jersey Medical School, Two Brook Road, Tenafly, NJ 07670;

Mr. John Sartain, Consulting Economist, Sartain & Company, 3811 Turtle Creek Centre, Suite 760, Dallas, Texas 75219;

Dr. James Robert Shepherd III, University of Texas Health Center at Tyler, Department of Radiology, P. O. Box 2003, Tyler, TX 75710;

Dr. Allan Shulkin, Medical City Dallas Hospital, 7777 Forest Lane, Suite 202, Dallas, Texas 75230.

Dr. Lewis Solmon, Associate Dean, Graduate School of Education, U.C.L.A., 308 Moore Hall, Los Angeles, CA 90024;

Dr. Jessie Steinfield

Dr. Paul Stevens, Baylor College of Medicine, 6516 Bertner, Houston, TX 77030;

Hans Weill, M.D., 1700 Perdido St., New Orleans, LA 70310;

Thomas M. Wheeler, M.D., One Baylor Plaza, Baylor College of Medicine, Houston, TX 77030;

Dr. R. Keith Wilson, 6535 Fannin, Mail Station F-907, Houston, TX 77030;

Any and all medical experts retained by the law firms of DeHay & Blanchard, Baker & Botts, and Butler & Binion, in their role as liaison defense counsel;

Any and all of Plaintiffs' treating physicians whose names, addresses and qualifications are already known to Plaintiffs' attorneys to testify as to Plaintiffs' physical condition;

Defendant reserves the right to call any expert witnesses designated by Plaintiffs or any other Defendant in this cause. This includes all treating physicians, healthcare providers, and medical record custodians.

At this time Defendant CONGOLEUM CORPORATION has made an effort to identify the witnesses it presently contemplates calling. However, this Defendant anticipates that on-going

discovery being conducted by the parties may produce further information concerning theories of liability and alleged medical condition. Therefore, this Defendant reserves the right to reserve a supplementary list of expert witnesses, based on discovery conducted subsequent to the date of preparation of this designation of expert witnesses.

(b),(c) Dr. Elvin Adams will testify on asbestos-related diseases' effects, and in particular on smoking's effects.

Dr. Oscar Auerbach is a pathologist; he will testify to all matters pertaining to scientific study and research concerning exposure to asbestos in regard to the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion regarding whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and all other matters concerning plaintiff's medical condition.

Dr. Stephen Ayers is a pulmonary specialist; he will testify to all matters pertaining to the history of scientific knowledge, research, and study concerning exposure to asbestos and its effects on the human body; to all state-of-the-art issues; to his expert opinion regarding safe levels of asbestos exposure and the basis of such opinions; regarding the exposure to asbestos and development of respiratory diseases, including but not limited to asbestosis, lung cancer, and mesothelioma; to the effects of exposure to the chrysotile fiber and other asbestos fibers.

Dr. Boudreaux is an economic consultant and may testify regarding the economic loss incurred by the death of a Plaintiff.

Dr. Sam Cade is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Cadman is a licensed physician and Professor of Medicine who specializes in oncology. He is expected to testify as to the history and development of medical knowledge concerning asbestos-related disease. He may also testify regarding the relationship, if any, between asbestos and Plaintiff's medical condition.

Dr. Cagle is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition.

Dr. Andrew Churg is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and to the effects of exposure to chrysotile fibers on the human body.

Dr. Cimino is presently Professor and Chairman of the Department of Community and Preventive Medicine, New York Medical College, Valhalla, New York. Dr. Cimino may be expected to testify generally about research in the area of pulmonary pathology and about the process by which medical knowledge evolved. He may also be expected to testify regarding the state of medical knowledge from the early part of the century to the middle 1960's as it regards pathological changes due to exposure to asbestos. This Defendant believes that Dr. Cimino is of the opinion that prior to the 1960's the state of the medical art was that exposure to large amounts of asbestos over an extended period of time could cause asbestosis; however, there was an accepted, safe level of exposure below which there was no risk of harm; that this level was accepted by the medical and scientific community; and that there was no acceptance of a link between asbestosis and mesothelioma or any form of cancer until the 1960's. The opinions of Dr. Cimino are based upon his training in medicine, his extensive professional qualifications, his research in pulmonary pathology and his review of the relevant medical literature.

Dr. Bobby F. Craft will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos-related diseases in the late 1960's or early 1970's.

Dr. John E. Craighead is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to

asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and the effects of exposure to chrysotile fibers on the human body.

Dr. Delclos is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Harry Demopoulos is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition; and to all state-of-the-art issues.

Dr. Scott R. Donaldson is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Gregory H. Foster is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Edward A. Gaensler, Boston University Medical Center, 80 East Concord Street, Boston, Massachusetts 02118. Dr. Gaensler, will testify as to the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestos and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases particularly means of establishing the differential diagnosis of alleged asbestos-related differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis, compared with non-asbestotic asbestos workers and with the general population; cigarette smoking and its effect on the lung; the relationship of cigarette smoking to cancer of the lung and cancers of other sites with referenced to epidemiological studies and physiologic effect; difference between impairment and disability; effect of asbestosis on disability and life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; and the history of evolution and knowledge of asbestos-related diseases.

Dr. Joe G.N. Garcia is a medical doctor. He may testify about the medical condition of the Plaintiff and about asbestos-related diseases.

Dr. Gray is a medical doctor and a board certified specialist in internal medicine. His testimony will discuss the structure and function of the respiratory system, the effects of cigarette smoking, and the diseases of the lungs, including asbestos-related diseases.

Dr. Donald Greenburg is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to plaintiff's medical condition; to all state-of-the-art issues.

Dr. Peter Heidbrink is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's

family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Henderson may testify concerning the relationship of asbestos and smoking to the development of cancer. Dr. Henderson may also testify concerning the incidence of lung cancer among individuals with asbestosis or exposure to asbestos-containing products. Dr. Henderson may also testify regarding general pathology and the pathology of the Plaintiff and/or Plaintiff's decedent.

Dr. Elliott Hinkes is a specialist in the area of oncology; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. H. Corwin Hinshaw is a pulmonary diseases specialist; he will testify to all matters pertaining to the effects of asbestos exposure on the human body, medical and scientific research and study on the effects of asbestos exposure; all state-of-the-art issues; to the combined effects of cigarette smoking and exposure to asbestos.

Dr. Gerald Kerby is a pulmonary diseases specialist; he will testify to all matters pertaining to scientific knowledge, research and study of the effects of exposure to asbestos on the human body; to the latency periods of asbestos-related diseases; to the various types of asbestos fibers and their effects on the human body; to the effects of exposure chrysotile fiber in regard to asbestos-related diseases, including but not limited to asbestosis, lung cancer, mesothelioma, to all matters pertaining to the plaintiff's medical condition; to all state-of-the-art issues.

B.K. Kwon is a toxicologist and industrial hygienist who will testify concerning the manufacturing process and material used in the manufacture of asphalt tile and vinyl asbestos tile, and the fact that any asbestos contained in these Congoleum flooring materials was encapsulated. He will further testify that encapsulation changes the biological properties of the asbestos so that it becomes biologically inactive, and inhalation of encapsulated asbestos fibers cannot cause asbestos-related diseases. He will also testify concerning government regulations as they pertain to encapsulated asbestos fibers and products such as that manufactured or sold by this Defendant.

Dr. Jeffrey S. Lee will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos-related diseases in the late 1960's or early 1970's.

Dr. Lockey will testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system.

Dr. Forde A. McIver will testify on state-of-the-art and the Saranac papers, to the effect that the Defendants could not have known that users were at risk until approximately the late 1960's.

Dr. Joseph M. Miller will testify on state-of-the-art and the Saranac papers, to the effect that the Defendants could not have known that users were at risk until approximately the late 1960's.

Dr. Morgan is a professor of medicine and director of chest diseases services at the University of Western Ontario. He was educated in England and Scotland, and among other appointments is a member of the Advisory Board for Occupation Health & Safety Resource Centre at the University of Western Ontario. He has knowledge of the pathology, diagnosis, testing and causation of pulmonary and related disease, including mesothelioma, lung cancer and asbestosis. He will testify about the state-of-the-medical-art as it relates to knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. He may testify about the Plaintiffs' medical condition.

Dr. Robert M. O'Neal is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination review of the plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestos, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition; to all state-of-the-art issues.

Dr. Polinsky is an expert who will testify about the inappropriateness of punitive damages in this and similar cases based upon research he and others have conducted.

Bill Powell is a chemist, and former director of quality testing at Congoleum Corporation. He has authored several patents on behalf of Congoleum, has been involved in the

developmental work of different methods of floor covering manufacturing processes, and is familiar with the history of the chemistry of the floor covering industry. He is also familiar with the types of products manufactured and sold by Congoleum Corporation. He will testify on those issues, as well as the fact that the manufacturing process of asphalt asbestos floor tile and vinyl asbestos floor tile are such that any asbestos fibers were encapsulated.

Dr. Lee B. Reichman is a pulmonary disease specialist; he will testify to all matters pertaining to respiratory diseases, including the effects of asbestos exposure on the human body, development of asbestosis, lung cancer, mesothelioma; asbestos fiber type and its effects on the human body; research and study on the effects of the chrysotile fiber on the human body and in relation to the development of respiratory diseases; scientific study, research and opinion regarding exposure to asbestos dust and its effects on the human body; the diagnostic criteria for diagnosing asbestosis, mesothelioma and other respiratory diseases; all state-of-the-art issues; his examination of the plaintiff and plaintiff's medical records; x-rays of the plaintiff; opinion as to whether or not plaintiff suffers from a respiratory disease and the basis of such opinion.

Mr. Sartain is an economic consultant and may testify regarding the economic loss incurred by the death of a Plaintiff.

Dr. James Robert Shephard III is a specialist in the area of radiology; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Allan Shulkin is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Solmon is an expert who will testify about the historical sales and market shares of asbestos insulation manufacturers.

Dr. Jessie Steinfield will testify concerning government warnings, smoking, and some areas of state-of-the-art.

Dr. Paul Stevens is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Hans Weill is a pulmonary diseases specialist; he will testify to all matters pertaining to scientific knowledge, research and study in regard to exposure to asbestos and its effects on the human body; to the latency periods of asbestos-related diseases; to the various types of asbestos fibers and their effects on the human body; to the effects of exposure to chrysotile fiber in regard to asbestos-related diseases; scientific criteria used to diagnose respiratory diseases, including but not limited to asbestosis, lung cancer and mesothelioma; to all matters pertaining to the plaintiff's medical condition; and to all state-of-the-art issues.

Dr. Thomas M. Wheeler is a pathologist; he will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition; to all state-of-the-art issues.

Dr. R. Keith Wilson is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

(d) If and when Defendants' experts prepare a report which will be used at trial, Plaintiffs will be provided a copy of same.

(e) This answer will be supplemented pursuant to the Texas Rules of Civil Procedure.

INTERROGATORY NO. 61:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

- (a) identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.
- (b) Each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;
- (c) the negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;
- (c) each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER: Congoleum will identify those individuals with knowledge of relevant facts as discovery progresses.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER: This Defendant objects to this Interrogatory and the identification of such documents on the grounds that it is overly broad and unduly burdensome. Defendant further objects on the grounds that it calls for the disclosure of work product and attorney/client thought processes. Subject to these objections, and without waiving same, Defendant responds that this Answer will be supplemented pursuant to the Texas Rules of Civil Procedure and Dallas County Local Rules.

INTERROGATORY NO. 63:

Please state when you first received a copy of the Fleischer/Drinker Reports published in 1945/1946.

ANSWER: Based on reasonable belief, Congoleum never received a copy of this report.

ANSWERS TO REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

RESPONSE: To the extent photographs are available, they will be produced for inspection at the office of the undersigned counsel at a mutually convenient date and time.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE: None.

STATE OF NEW JERSEY §
COUNTY OF MERCER §

BEFORE ME, the undersigned authority, on this day personally appeared Don Golemme, to me well known to be an authorized representative for the Defendant, CONGOLEUM CORPORATION, in the above-entitled and numbered cause, and being by me duly sworn, stated upon oath that he is duly qualified and authorized to make the attached Answers to Interrogatories pursuant to Rules 167 and 168 of the Texas Rules of Civil Procedure, that he has read the answers, and they are true and correct in every respect, and that he did execute the answers in his stated capacity.

[Signature]
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME this 8th day of MAY, 1992, to certify which witness my hand and official seal.

[Signature]
Notary Public of _____

My Commission Expires: _____

[Faint circular notary seal]

ASPHALT TILE 1947 - 1951

<u>Congoleum Nairn</u>	<u>Nairn Asphalt Tile</u>		
		MA4	1947 - 1948
		MA2	1947 - 1951
		MA5	1947 - 1951
		MB-21	1947 - 1949
		MB-22	1947 - 1951
		MB-23	1950 - 1951
		MB-25	1947 - 1951
		MB-26	1947 - 1951
		MB-27	1947 - 1949
		MB-28	1947 - 1951
		MB-29	1947 - 1951
		MB-11	1947 - 1948
		MB-12	1947 - 1948
		MC-100	1947 - 1951
		MC-101	1949 - 1951
		MC-102	1947 - 1951
		MC-103	1947 - 1951
		MC-106	1947 - 1948
		MC-121	1947 - 1951
		MC-122	1951
		MC-123	1947 - 1951
		MC-124	1947 - 1951
		MC-126	1947 - 1951
		MC-127	1947 - 1951
		MC-128	1947 - 1951
		MD-280	1947 - 1951
		MD-223	1947 - 1951
		MD-213	1948 - 1950
		MD-210	1950 - 1951
		MD-202	1950 - 1951

TILE 1952 - 1955

Congoleum
Nairn

Gold Seal
Vinyl Tile

PT01	1952 - 1955
PT02	1952 - 1955
PT03	1953 - 1955
PT04	1952 - 1955
PT05	1952
PT06	1953 - 1955
PT07	1952 - 1954
PT08	1952 - 1954
PT09	1953 - 1955
PT10	1954 - 1955
PT11	1953 - 1955
PT12	1952 - 1955
PT13	1953 - 1955
PT14	1953 - 1954
PT15	1953 - 1954
PT17	1954 - 1955
PT18	1954 - 1955
PT19	1955
PT20	
PT21	
PT22	
PT23	
PT24	
PT25	
PT26	
PT27	

TILE 1952 - 1955

Congoleum
Nairn

Gold Seal
Vinyl Tile

Bermuda Hues



PT30	1953 - 1955
PT31	1953 - 1955
PT32	1953 - 1955
PT33	1953 - 1954
PT34	1953 - 1955
PT35	1953 - 1955
PT36	1953 - 1955
PT37	1953 - 1954
PT38	1953 - 1955
PT39	1953 - 1955
PT40	1954 - 1955
PT41	
PT42	

TILE 1956 - 1958

Congoleum
Nairn

Gold Seal
Nairn Standard
Title

PT01	1956 - 1958
PT02	1956 - 1958
PT04	1956 - 1958
P506	1956 - 1958
PT09	1956 - 1958
PT10	1956 - 1958
PT11	1956 - 1957
PT13	1956
PT17	1956 - 1958
PT18	1956 - 1957
PT19	1956 - 1958
PT21	1956 - 1957
PT22	1956
PT23	1956 - 1958
PT24	1956 - 1958
PT25	1956
PT26	1956
PT27	1956
PT28	1956
PT29	1956
PT38	1958
PT40	1958
PT50	1957 - 1958



TILE 1956 - 1958Congoleum
NairnGold Seal
Nairn Standard
TileBermuda Hue

PT30	1956 - 1957
PT31	1956 - 1957
PT32	1956
PT34	1956 - 1957
PT35	1956 - 1957
PT36	1956 - 1957
PT38	1956 - 1957
PT39	1956
PT40	1956 - 1957
PT41	1956
PT42	1956

↓

Gold Seal
Nairn Standard
Tile

Berylstone

B-70	1958
B-71	
B-72	
B-73	
B-74	
B-75	
B-76	
B-77	
B-78	

↓

TILE 1956 - 1958

Congoleum
Nairn

Gold Seal
Nairn Custom
Title

Sequin (1956-1957), Standard (1958)

5000 1956 - 1958
5001 1956 - 1957
5002 1956 - 1958
5003 1956 - 1958
5004 1956 - 1947
5005 1956 - 1957
5006 1956 - 1958
5007 1958
5008
5009
5010
5011
5012



Sequin (1956 - 1957), Designer (1958)

5100 1956 - 1958
5101 1956 - 1958 5200 1958
5102 1956 - 1958 5201
5103 1956 5530
5104 1956 - 1957 5551
5105 1956 - 1958 5552
5106 1956 - 1958 5553
5107 1956 - 1957 5554
5108 1956 - 1958 5510
5109 1956 - 1957 5511
5110 1958 5512
5111 5513
5112 5514
5513
5514
5515
5516
5517
5518
5519
5520
5521

TILE 1956 - 1958

Congoleum
Nairn

Gold Seal
Nairn Custom
Tile

Plain

5200 1956 - 1957
5201 1956 - 1957

Venetian

5251 1956 - 1958
5252 1956 - 1958
5253 1956 - 1958
5254 1956 - 1958
5255 1956 - 1958
5256 1957 - 1958
5257 1957 - 1958
5258 1957 - 1958
5259 1957 - 1958

Marble

5500 1956 - 1957
5501
5502
5503
5504
5505
5506



TILE 1959

Congoleum
Nairn

Flor-Ever
Vinyl Tile

PT01

1959

PT02

PT04

PT09

PT10

PT19

PT24

PT38

PT40

PT51

PT52

PT53

PT54

P-800

P-804

P-806

P-807

P-809

P-810

P-811

P-812

P-815

P-816

P-817

Berylstone

B-71

B-72

B-73

B-75

B-77

TILE 1959 - 1961

<u>Congoleum</u> <u>Nairn</u>	Nairn Custom <u>Tiffany Vinyl Tile</u> (1959 - 1960)	5410	1959 - 1961
	↓	5411	1959 - 1961
	Nairn Custom <u>Translucent Vinyl</u> <u>Tile (1961)</u>	5412	1959 - 1961
		5413	1959 - 1961
		5414	1919 - 1961
		5415	1959 - 1961
		5300	1959 - 1961
		5301	1959 - 1961
		5302	1959 - 1961
		(55302)	
		5303	1959 - 1961
	✓	5304	1959 - 1961
	Nairn Custom <u>Vinyl Dynasty</u> <u>Tiles & Tile Inserts</u> (1959 - 1960)	D5000	1959 - 1961
		D5108	
		D5115	
	Nairn Custom <u>Dynasty Vinyl</u> <u>Tiles & Tile Inserts</u> (1961)	D5116	
		D5200	
	↓	D5201	

TILE 1959 - 1962

Congoleum
Nairn

Nairn Custom
Vinyl Tile

Standard

5000 1959 - 1961
5002 1959 - 1961
5003 1959 - 1961
5006 1959 - 1961
5007 1959 - 1961
5008 1959 - 1961
5009 1959 - 1961
5010 1959 - 1961
5011 1959 - 1961
5012 1959 - 1961
5200 1960 - 1961
5201 1960 - 1961
5510 1960 - 1961
5511 1960 - 1961
5512 1960 - 1961
5513 1960 - 1961
5514 1960 - 1961

Congoleum
Nairn

Nairn Custom
Vinyl Tile

Venetian

5251 1959, 1961 - 1962
5252 1959
5253 1959
5354 1959 - 1962
5255 1959 - 1962
5256 1959 - 1962
5257 1959 - 1962
5258 1959 - 1962
5259 1959 - 1962
5260 1959
5261 1959 - 1962
5262 1959 - 1962
5263 1959 - 1962
5264 1961 - 1962
5265 1961 - 1962
5266 1961 - 1962
5267 1961 - 1962
5268 1961 - 1962
5269 1961 - 1962
5270 1961 - 1962

TILE 1959 - 1962

<u>Congoleum Nairn</u>	<u>Nairon Custom Vinyl Tile</u>	<u>Designer</u>	
		5100	1959 - 1961
		5101	
		5102	
		5105	
		5106	
		5108	
		5110	
		5111	
		5112	
		5113	
		5114	
		5115	
		5116	
		5117	
		5118	✓
		5119	1959 - 1960
		5120	
		5121	
		5122	✓
		5200	1959
		5201	1959
		5550	1959 - 1961
		5551	
		5552	
		5553	
		5554	✓

A-14

ASPHALT TILE 1952 - 1958

<u>Congoleum Nairn</u>	<u>Gold Seal Asphalt Tile</u>		
		MA-2	1952 - 1958
		MA-5	1952 - 1958
		MB-32	1952 - 1958
		MB-33	1952 - 1956
		MB-35	1952 - 1958
		MB-36	1952 - 1958
		MB-38	1952 - 1956
		MB-39	1952 - 1956
		MC-111	1952 - 1957
		MC-114	1952 - 1956
		MC-116	1952 - 1956
		MC-118	1952 - 1957
		MC-131	1952 - 1958
		MC-132	1952 - 1958
		MC-133	1952 - 1956
		MC-134	1952 - 1955
		MC-136	1952 - 1958
		MC-137	1952 - 1955
		MC-138	1952 - 1956
		MC-139	1953 - 1958
		MC-140	1955 - 1958
		MC-141	1956 - 1958
		MC-142	1956 - 1958
		MC-143	1956 - 1958
		MC-203	1953, 1955 - 1957
		MD-212	1952 - 1958
		MD-213	1953
		MD-214	1953 - 1958
		MD-215	1953 - 1958
		MD-216	1953 - 1958
		MD-220	1952 - 1958
		MD-233	1952 - 1958
		MD-243	1952 - 1953, 1955 - 1956
		MD-290	1952 - 1958

ASPHALT TILE 1955 - 1958Congoleum
NairnGold Seal
Asphalt TileSequin

B-405	1955 - 1958
B-432	1955 - 1958
B-435	1955 - 1956
C-431	1956 - 1958
C-439	
C-440	
C-441	
D-412	1955 - 1958
D-413	
D-414	
D-415	
D-450	1955 - 1956



ASPHALT TILE 1959 - 1971

Congoleum Nairn (1959-1968)	Asphalt Tile	<u>Gala</u>	(1961 - 1965)
		MC-50	1961 - 1962
		MC-51	1961 - 1962
		MC-52	1961 - 1962
		MC-53	1961 - 1962
		MC-54	1961 - 1968
		MC-55	1961 - 1966
		<u>Corkette</u>	(1961 - 1965)
		MK-101	1959 - 1961
		MK-102	1959 - 1961
		MK-103	1959 - 1961
		MK-104	1962 - 1969
		MK-105	1962 - 1969
		MK-106	1962 - 1965
		<u>Tweed Texture</u>	(1963 - 1965)
		MK-112	1963 - 1968
		MK-113	1963 - 1968
		MK-114	1963 - 1965
		MK-115	1963 - 1965

ASPHALT TILE 1959 - 1971

Congoleum Nairn (1959 - 1968)	Asphalt Tile	Feathervein, Featherveining (1959 - 1965)
		MA-2 1959 - 1961
		MA-5 1959 - 1961
		MB-12 1959 - 1971
		MB-15 1959 - 1971
		MB-16 1959 - 1960
		MB-17 1961 - 1969
		MB-19 1959 - 1968
		MC-31 1959 - 1969
		MC-32 1959 - 1968
		MC-35 1961 - 1969
		MC-36 1959 - 1960
		MC-37 1961 - 1970
		MC-38 1961 - 1971
		MC-39 1959 - 1970
		MC-40 1961 - 1971
		MC-41 1959 - 1971
		MC-42 1959 - 1968
		MC-43 1959 - 1960
		MC-44 1961 - 1970
		MC-45 1959 - 1971
		MD-70 1959 - 1960]
		MD-72 1959 - 1964
		MD-74 1959 - 1960
		MD-75 1959 - 1960
		MD-76 1959 - 1964
		MD-77 1961 - 1969
		MD-78 1961 - 1965
		MD-80 1959 - 1969

CT 1

COUNTER TOPS, ETC. 1952 - 1955

<u>Congoleum Nairn</u>	<u>Sold Seal Vinyl Inlaids</u>	<u>Vinyl Top</u>
		3000 1952 - 1955
		3001 1953 - 1954
		3002 1952 - 1955
		3003 1952 - 1955
		3006 1953 - 1954
		3007 1953 - 1954
		3009 1952 - 1955
		3011 1952 - 1955
		3014 1953 - 1954
		3015 1953 - 1954
		3017 1954 - 1955
		3020 1955
		3021 1955
		3022 1955
		3030 1954 - 1955
		3031 1954 - 1955
		3032 1955
		3034 1955
		3037 1954
		3038 1954 - 1955
		3039 1954 - 1955
		3041 1955
		3054 1955

COUNTER TOP, ETC. 1956 - 1958

<u>Congoleum</u> <u>Nairon</u>	<u>Gold Seal</u> <u>Nairon Standard</u>	<u>Nairon Top</u>	
		3000	1956 - 1958
		3002	1956 - 1958
		3009	1956 - 1958
		3011	1956 - 1957
		3017	1956 - 1958
		3021	1956 - 1957
		3022	1956
		3023	1957 - 1958
		3030	1956 - 1957
		3031	1956 - 1957
		3032	1956
		3034	1956 - 1957
		3038	1956 - 1958
		3039	1956
		3041	1956
		3042	1956 - 1957
		3043	1957
		<u>Viscount</u>	
		3050	1958
		3051	1958
		3052	1958
		3053	1958
		3054	1958
		3055	1958

COUNTER TOPS, ETC. 1959 - 1960

<u>Congoleum</u> <u>Nairn</u>	<u>Flor-Ever</u> <u>Vinyl Top</u>	<u>Marble</u>	
		3000	1959 - 1960
		3001	1959 - 1960
		3002	1960
		3004	1959
		3009	1960
		3038	1959 - 1960
		<u>Viscount</u>	
		3050	1959
		3051	1959
		3052	1959 - 1960
		3053	1959
		3054	1959 - 1960
		3055	1959 - 1960
		3056	1959 - 1960
		3057	1959
		3058	1959 - 1960

6' SHEET FLOORING 1952 - 1954

<u>Congoleum</u> <u>Nairn</u>	<u>Gold Seal</u> <u>Vinyl Inlaids</u>	<u>Vinylflor</u>	
		2000	1952 - 1954
		2001	1952 - 1954
		2002	1952 - 1954
		2003	1952 - 1954
		2004	1952 - 1954
		2005	1952
		2006	1952 - 1954
		2007	1952 - 1954
		2008	1952 - 1954
		2009	1952 - 1953
		2011	1952 - 1953
		2012	1952 - 1953
		2013	1952 - 1953
		2014	1952 - 1954
		2015	1952 - 1953
		2016	1954
		2017	1954

6' SHEET FLOORING 1955 - 1958

<u>Congoleum</u> <u>Nairn</u>	<u>Gold Seal</u> <u>Vinyl Inlaids</u> (1955)		
	↓	2000	1955 - 1957
		2001	1955 - 1958
		2002	1955 - 1957
	Gold Seal Nairn Standard (1956 - 1958)	2003	1955
	↓	2004	1955 - 1958
		2006	1955 - 1958
		2009	1955 - 1958
		2011	1955 - 1957
		2012	1955
		2013	1955 - 1956
		2017	1955 - 1958
		2018	1955 - 1957
		2019	1955 - 1958
		2020	1955
		2021	1955 - 1957
		2022	1955 - 1956
		2023	1955 - 1958
		2024	1955 - 1958
		2025	1955 - 1956
		2026	1955 - 1956
		2027	1955 - 1956
		2028	1956
		2029	1956
		2050	1957 - 1958

6' SHEET FLOORING 1957 - 1958

<u>Congoleum</u> <u>Nairn</u>	<u>Gold Seal</u> <u>Nairn Standard</u>	<u>Berylstone</u>	
		2070	1957 - 1958
		2071	1957 - 1958
		2072	1957 - 1958
		2073	1957 - 1958
		2074	1957 - 1958
		2075	1957 - 1958
		2076	1958
		2077	1958
		2078	1958
<u>Congoleum</u> <u>Nairn</u>	<u>Gold Seal</u> <u>Nairn Deluxe</u>	6000	1957 - 1958
		6001	1957 - 1958
		6003	1957 - 1958
		6005	1957 - 1958
		6006	1957 - 1958
		6007	1957 - 1958
		6008	1957 - 1958
		6009	1958
		6010	1958
		6011	1958

VINYL ASBESTOS TILE 1959 - 1962

Congoleum

Vinylbest

Gala

Nairn

Tile

VA 520

1960 - 1962

VA 521

VA 522

VA 523

VA 524

VA 525

1960 - 1961

VA 526

1960 - 1961

VA 527

1960 - 1962

VA 528

VA 529

VA 530

1960 - 1961

VA 531

1960 - 1962

VA 532

VA 533

VA 534

VA 535

VA 536

VA 540

VA 541

VA 542

VA 543

1960 - 1961

VINYL ASBESTOS TILE 1959 - 1962

Congoleum
Nairn

Vinylbest
Tile

Featherveining

VA 11 (VA 612)	1959-1961-1962
VA 12 (VA 612)	1959-1962
VA 13 (VA 613)	1959-1960
VA 14	1959-1960
VA 15	1959
VA 16 (VA 616)	1959
VA 17	1959-1960
VA 18	1959-1960
VA 19 (VA 619)	1959-1960
VA 20	1959
VA 21	1959
VA 22	
VA 23	
VA 24	
VA 25	
VA 26 (VA 626)	1960-1962
VA 27 (VA 627)	1960-1962
VA 28 (VA 628)	1960-1962
VA 29 (VA 629)	1960-1962
VA 30 (VA 630)	1960-1962
VA 31 (VA 631)	1960-1962
VA 32 (VA 632)	1960-1962
VA 33 (VA 633)	1960-1962
VA 34 (VA 634)	1960-1962
VA 35 (VA 635)	1960-1962
VA 36 (VA 636)	1960-1962
VA 37 (VA 637)	1960-1962
VA 38 (VA 638)	1960-1962
VA 39 (VA 639)	1960-1962
VA 40 (VA 640)	1961-1962
VA 641	1961-1962
VA 642	1961-1962
VA 43 (VA 643)	
VA 44 (VA 644)	

6' SHEET FLOORING 1959 - 1960

Congoleum
Nairn

Flor-Ever Vinyl

Marble

2000

1959 - 1960

2001

2004

2009

2019

2024

2053

2054

Berylstone

2071

1959

2072

2073

2075

2077

Picnic

2800

1959 - 1960

2804

2806

2807

1959

2809

1959 - 1960

2810

1959

2811

1959

2812

1959

2815

1959 - 1960

2816

1959

2817

1959

6' SHEET FLOORING 1959 - 1960Congoleum
NairnFlor-Ever
Deluxe Vinyl

6000	1959 - 1960
6001	1959
6005	1959
6006	1959 - 1960
6007	1959
6009	1959
6011	1959
6012	1959 - 1960
6013	1959
6014	1959
6015	1960
6016	1960
6017	1960

VINYL ASBESTOS TILE 1963 - 1968

Congoleum

Nairn

Sparklewood

VA 511

1963

VA 512

VA 514

VA 515

VA 516

VA 518

VA 519



VINYL ASBESTOS TILE 1963 - 1968

Congoleum
Nairn

Gala

VA 520 1963 - 1964

VA 522

VA 524

VA 527

VA 531

VA 533

VA 535

VA 536

VA 541

VA 542

Feathervein

VA 11 (611)(211) 1963 - 1968

VA 12 (612)(212) 1963 - 1968

VA 26 (626) 1963 - 1965

VA 27 (627) 1963 - 1968

VA 28 (628)

VA 29 (629)(229)

VA 30 (630)(230)

VA 31 (631)

VA 32 (632) 1963 - 1965

VA 33 (633) 1963 - 1968

VA 34 (634)

VA 36 (636)(236)

VA 37 (637) 1963 - 1965

VA 38 (638)(238) 1963 - 1968

VA 39 (639)(239)

VA 41 (641)

VA 42 (642) 1963 - 1965

VA 43 (643) 1963 - 1968

VA 44 (644) 1963 - 1965

VA 45 (645) 1963 - 1965

VA 47 (647) 1963 - 1965

VA 48 (648) 1963 - 1968

VA 49 (649)

VA 50 (650)

VA 51 (651)

VA 52 (652) 1963 - 1965

VINYL ASBESTOS TILE 1963 - 1968

Congoleum
Nairn

Feathervein

VA 53 (653)(253)	1963 - 1966 & 1968
va 54 (654)	1963 - 1965
va 55 (655)	1963 - 1966 & 1968
va 684	1963 - 1968
VA 685	1963 - 1968
VA 19	1967 - 1968
VA 20 (220)(620)	
VA 21	
VA 22 (220)(620)	
VA 23	
VA 24 (224)	
VA 25	

Thru-Style

VA 70	1963 - 1968
VA 71	
VA 72	
VA 73	1963 - 1965, 1967 - 1968
VA 74	1963
VA 75	1963 - 1968
VA 76	
VA 77	
VA 78	
VA 79	1963
VA 80	1963 - 1968
VA 81	1963 - 1965, 1967 - 1968
VA 82	1963 - 1965
VA 83	
VA 84	
VA 85	

Vinylstone

VA 595	1964 - 1968
VA 596	
VA 597	
VA 598	
VA 599	
VA 600	1964 - 1968
VA 601	

VINYL ASBESTOS TILE 1963 - 1968

Congoleum
Nairn

Romanaire

VA 575 1964 - 1968

VA 576

VA 577

VA 578

VA 579

VA 580

VA 581

VA 582

VA 583 1965 - 1968

VA 584

Rondelle

VA 720 1965 - 1968

VA 721 1965 - 1967

VA 722 1965 - 1968

VA 723

VA 724

VA 725

Dominique

VA 700 1965 - 1968

VA 701

VA 702

VA 703

VA 704

VA 705

VA 706

VA 707

VA 708

VA 709

Woodgrain and Travertine

VA 800 1966 - 1968

VA 801 1966 - 1968

VA 805 1966 - 1967

VA 806 1966 - 1967

VA 807 1966 - 1968

VA 808 1966 - 1968

VINYL ASBESTOS TILE 1963 - 1968Congoleum
NairnCanyon Stone

VA 815 1967 - 1968

VA 816

VA 817

VA 818

Ranch Tile

VA 827 1967 - 1979

VA 828

VA 829

VA 825 1968

VA 826 1968

English Brick

VA 240 (840) 1967 - 1968

VA 241 (841)

VA 243 (843)

VA 242 (842)

Corsicana

VA 830 1967 - 1968

VA 831

VA 832

VA 833

VA 834

VA 835

Corinthian

VA 120 1968

VA 121

VA 122

VA 123

VA 124

VA 125 1968

VA 126

VINYL ASBESTOS TILE 1963 - 1968Congoleum
NairnSelect Color Series

VA 300 1968

VA 301

VA 302

VA 303

VA 304

VA 305

VA 306

VA 307

VA 545

VA 721

VA 805

VA806

VA850

VA 851

VA 852

VA 853

VA 854

VA 855

VINYL ASBESTOS TILE 1954 - 1958

Congoleum
Nairn

Gold Seal
Vinylbest Tile

VA 311	1954 - 1958
VA 312	1954 - 1958
VA 313	1954 - 1957
VA 314	1954 - 1957
VA 317	1954 - 1956
VA 321	1954 - 1955
VA 322	1954 - 1958
VA 324	1954 - 1958
VA 325	1954 - 1957
VA 326	1954 - 1957
VA 327	1954 - 1957
VA 328	1954 - 1958
VA 329	1954 - 1958
VA 331	1954 - 1957
VA 332	1954 - 1958
VA 333	1954 - 1955
VA 336	1954 - 1958
VA 337	1954 - 1958
VA 338	1955 - 1956
VA 339	1956 - 1958
VA 340	1956 - 1958

BRUSHWOOD

VA 500	1957 - 1958
VA 501	
VA 502	
VA 503	
VA 504	
VA 505	
VA 506	
VA 507	
VA 508	1958
VA 509	1958

VINYL ASBESTOS TILE 1959 - 1962

Congoleum
Name

Vinylbest
Tile

Brushwood

VA 500

1959 - 1961

VA 501

VA 502

VA 503

VA 504

VA 505

VA 506

VA 507

VA 508

VA 509

Sparklewood

VA 510

1960 - 1962

VA 511

VA 512

VA 513

VA 514

VA 515

VA 516

VA 517

VA 518

VA 519

Thru Style

VA 70

1962

VA 71

VA 72

VA 73

VA 74

VA 75

VA 76

VA 77

VA 78

VA 79

VINYL ASBESTOS TILE 1969 - 1972

Congoleum

Dominique

VA 701 1969

VA 702

VA 703

VA 704

VA 708

VA 709

Select Color Series

VA 300 1969 - 1972

VA 301

VA 302

VA 303

VA 304

VA 305

VA 306

VA 307

VA 545

VA 721

VA 805 1969 - 1970

VA 806

VA 850

VA 851

VA 852

VA 853

VA 854

VA 855

Catalina

VA 740 1969 - 1972

VA 741

VA 742

VA 743

VA 744

VA 745

VA 746

VA 747

VA 748

VA 749

VINYL ASBESTOS TILE 1969 - 1972

Congoleum

Vinyl Stone

VA 595 1969

VA 596

VA 597

VA 598

VA599

VA 600

VA 601



Rondelle

VA 720 1969

VA 722

VA 723

VA 724

VA 725



Woodgrain

VA 800 1969 - 1972

VA 801



Canyon Stone

VA 815 1969

VA 817

VA 816

VA 818



Caribbean

VA 730 1969 - 1972

VA 731

VA 732

VA 733

VA 734

VA 735

VA 736



Corsicana

VA 830 1969

VA 831

VA 832

VA 833

VA 834

VA 835



VINYL ASBESTOS TILE 1969 - 1972

Congoleum

Parthenon

VA 870 1969 - 1972
 VA 871
 VA 872
 VA 873
 VA 874



Corinthian

VA 120 1969 - 1972
 VA 121
 VA 122
 VA 123
 VA 124
 VA 125
 VA 126



Feathervein

VA 11 (211)(611) 1969 - 1972
 VA 12 (212)(612)
 VA 19
 VA 20 (220)(620)
 VA 21
 VA 22 (222)
 VA 23
 VA 29 (229)(629)
 VA 30 (230)(630)
 VA 31 (631)
 VA 33 (633) 1969 - 1971
 VA 34 (634)
 VA 36 (236)(636) 1969 - 1971
 VA 38 (238)(638)
 VA 39 (239)
 VA 641 1969
 VA 43 1969 - 1972





Congoleum

Feathervein

VA 48 (648)	1969 - 1972
VA 49	↓
VA 50	1969 - 1971
VA 51 (651)	↓
VA 53 (253)(653)	↓
VA 55	↓
VA 684	1969
VA 685	1969
VA 24	1970 - 1972
VA 25	↓
VA 27	↓
VA 28	↓

Thru Style

VA 70	1969 - 1972
VA 71	1969 - 1971
VA 72	1969 - 1972
VA 73	↓
VA 75	↓
VA 76	↓
VA 77	↓
VA 78	1969 - 1970
VA 80	1969 - 1972
VA 81	1969 - 1970
VA 82	1969 - 1972
VA 83	↓
VA 84	↓
VA 85	↓

Grandview

VA 102	1970 - 1972
VA 103	↓
VA 104	↓
VA 105	↓
VA 106	↓
VA 107	↓
VA 108	↓
VA 109	↓
VA 110	1971 - 1972
VA 111	1971 - 1972

VINYL ASBESTOS TILE 1969 - 1972

Congoleum

Cameo

VA 420	1970 - 1972
VA 421	1970 - 1972
VA 422	
VA 423	↓
VA 424	1970 - 1971
VA 425	1970 - 1971

Carillon

VA 430	170 - 1971
VA 432	
VA 434	
VA 436	↓

Manor Wood

VA 450	1970 - 1971
VA 451	
VA 452	
VA 453	↓

Aztec

VA 410	1970 - 1971
VA 411	
VA 412	
VA 413	
VA 414	
VA 415	
VA 416	
VA 417	↓

San Paulo

VA 400	1970 - 1971
VA 401	
VA 402	
VA 403	
VA 404	1970 - 1971
VA 405	
VA 406	↓

VINYL ASBESTOS TILE 1969 - 1972CongoleumCinnarron

VA 755	1970 - 1972
VA 756	1970 - 1971
VA 757	1970 - 1972
VA 758	1970 - 1971
VA 5 9	1970 - 1972
VA 760	↓
VA 761	
VA 762	
VA 763	

Samara

VA 460	1971 - 1972
VA 461	↓
VA 462	
VA 463	
VA 464	
VA 465	

Libra

VA 935	1972
VA 936	↓
VA 937	
VA938	
VA939	

Capella

VA 930	1972
VA 931	↓

Venus

VA 920	1972
VA 921	↓
VA 922	
VA 923	1972
VA 924	↓

VINYL ASBESTOS TILE 1969 - 1972

Congoleum

Orion

VA 900	1972
VA 901	↓
VA 902	↓
VA 903	↓
VA 904	↓
VA 905	↓
VA 906	↓
VA 907	↓

Fontenay

VA 470	1972
VA 471	↓
VA 472	↓
VA 473	↓
VA 474	↓
VA 475	↓
VA 476	↓

Vinyl Best

El Camino

VA 940	1972
VA 941	↓
VA 942	↓
VA 943	↓
VA 944	↓

Ventura

VA 490	1972
VA 491	↓
VA 492	↓
VA 493	↓
VA 494	↓

Shelburne

VA 480	1972
VA 481	↓
VA 482	↓
VA 483	↓
VA 484	↓

VINYL ASBESTOS TILE 1973 - 1975

Congoleum

Vinylbest

Thru Style

VA 70 1973

VA 72

VA 73

VA 75

VA 76

VA 80

VA 82

VA 83

Grandview

VA 102 1973 - 1974

VA 103

VA 104

VA 105

VA 106

VA 107

VA 108

VA 109

VA 110

VA 111

Corinthian

VA 120 1973

VA 121

VA 122

VA 123

VA 124

VA 125

VA 126



VINYL ASBESTOS TIL 1973 - 1975

Congoleum

Vinylbest

Vinylbest

Wonderflor

(Self Adhering)

(1974 - 1975)

Selected Color Series

VA 300 1973 - 1975

VA 301

VA 302

VA 303

VA 304

VA 305

VA 306

VA 307

VA 545

VA 721

Cameo (W)

VA 420 1973 - 1975

VA 421

VA 422

VA 423

VA 424

VA 425

Samara (W)

VA 460 1973 - 1975

VA 461

VA 462

VA 463

VA 464

VA 465

Fontenay (W)

VA 470 1973 - 1975

VA 471

VA 472

VA 473

VA 474

VA 475

VA 476

VINYL ASBESTOS TILE 1973 - 1975

Congoleum

Vinylbest

Shelburne

Vinylbest/
Wonderflor
(Self Adhering)
(W)
(1974 - 1975)

VA 480 1973
VA 481
VA 482
VA 483
VA 484

Regalwood

VA 500 1973 - 1974
VA 501
VA 502
VA 503

Sunburst (W)

VA 510 1974 - 1975
VA 511
VA 512
VA 513

Bedford Slate

VA 520 1974
VA 521
VA 522
VA 523

Canyon Stone (W)

VA 530 1974
VA 531
VA 532
VA 533

English Brick (W)

VA 540 1975
VA 541

Park Ridge (W)

VA 550 1975
VA 551
VA 552

Sonoma (W)

VA 560 1975
VA 561
VA 562
VA 563
VA 564



VINYL ASBESTOS TILE 1973 - 1975

Congoleum

Vinylbest

Caribbean

Vinylbest/
Wonderflor
(Self Adhering)
W
(1974 - 1975)

VA 730 1973 - 1975
VA 731
VA 732
VA 733
VA 734
VA 735
VA 736

Catalina (W)

VA 740 1973 - 1975
VA 741
VA 742
VA 743
VA 744
VA 745
VA 746
VA 747
VA 748
VA 749

Woodgrain

VA 800 1973 - 1974
VA 801

Cimarron

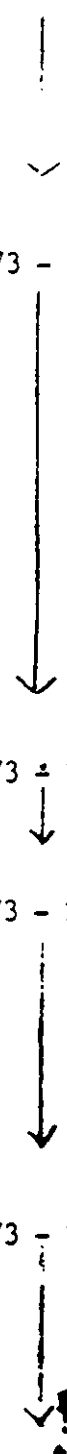
VA 755 1973 - 1974
VA 757
VA 759
VA 760
VA 761
VA 762

Parthenon (W)

VA 870 1973 - 1975
VA 871
VA 872
VA 873
VA 874

Capella

VA 930 1973
VA 931



VINYL ASBESTOS TILE 1973 - 1975

Congoleum

Vinylbest

Orion

Vinylbest/
Wonderflor
(Self Adhering)
W
(1974 - 1975)

VA 900 1973 - 1974
VA 901
VA 902
VA 903
VA 904
VA 905
VA 906
VA 907

EL CAMINO

VA 940 1973
VA 941
VA 942
VA 943
VA 944

Feathervein

VA 11 1973
VA 12
VA 19
VA 20
VA 21
VA 22
VA 23
VA 25
VA 27
VA 28
VA 29
VA 30
VA 31
VA 38
VA 39
VA 48
VA 49
VA 51
VA 53
VA 55



Featherveining cont'd

VA 45 (VA 645)	1962
VA 46 (VA 640)	↓
VA 641	1961-1962
VA 684	1962
VA 685	1962
VA 675	1959-1960
VA 676	1959-1960
VA 677	1959-1960
VA 678	1959
VA 679	1959
VA 680	1959
VA 681	1959-1960
VA 682	1959

SHEET FLOORING WITH ASBESTOS FELT 1965 - 1969

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Luxury Cushioned</u>	<u>Spring</u>	<u>Pebble</u>	4010	1965 - 1966
<u>Nairn</u>	<u>Vinyl</u>		(C) 1966	4011	
				4012	
				4013	
				4014	
				4015	
				4016	
				4017	
				4007	
				4008	
			↓		
			<u>Brick</u>	4020	1966
			↓	4021	
			↓	4022	
			↓	4023	
			<u>Colony Square</u>	4028	1966 - 1967
			↓	4029	
			↓	4030	
			↓	4031	
			<u>Georgian Marble</u>	4040	1967 - 1969
			↓	4041	
			↓	4042	
			↓	4043	
			↓	4044	
			↓	4045	
			<u>Persian Tile</u>	4060	1967 - 1969
			↓	4061	
			↓	4062	
			↓	4063	
			↓	4064	
			↓	4065	
			↓	4066	
			↓	4067	
			↓	4068	
			<u>Casa Grande</u>	4070	1967 - 1969
			↓	4071	
			↓	4072	
			↓	4073	
			↓	4069	
			↓	4075	

SHEET FLOORING WITH ASBESTOS FELT 1965 - 1969

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Luxury Cushioned</u>	<u>Spring</u>	<u>Town & Country</u>	4076	1968 - 1969
<u>Naim</u>	<u>Vinyl</u>			4077	
				4078	
1969					
<u>Congoleum</u>			<u>Williamsburg</u>	4032	1968 - 1969
			<u>Brick</u>	4033	
			<u>The Rembrandt</u>	4085	1969
				4086	
				4087	
			<u>The Stuart</u>	4090	1969
				4091	
				4092	
			<u>The Degas</u>	4095	1969
				4096	
				4097	
			<u>The Goya</u>	4100	1969
				4101	
				4102	
				4103	
	<u>Textured Inlaid</u>		<u>Cabana</u>	6400	1965 - 1969
	<u>Vinyl</u>			6401	
				6402	
				6403	
				6404	
				6405	
				6406	
				6407	
				6408	
				6409	
				6410	
				6411	
				6412	

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<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Textured Inlaid</u>	<u>Spring</u>	<u>Jamaican Pebble</u>	7300	1965 - 1966
<u>Nairn</u>	<u>Vinyl</u>			7301	
				7302	
				7303	
				7304	
				7305	
				7306	
				7307	
				7308	
				7309	
				7310	
				7311	
				7312	
				7313	
				7314	
				7315	
			<u>Illustra</u>	7150	1965 - 1967
				7151	
				7152	
				7153	
				7154	
				7155	
				7156	
				7157	
				7158	
				7159	
				7160	
	<u>Inlaid Vinyl</u>		<u>Spanish Stone</u>	7420	1968 - 1969
				7421	
				7422	
				7423	
				7424	
				7425	
				7426	
				7427	
				7428	
				7429	
				7430	
				7431	
				7432	
				7433	
				7434	
				7435	
				7436	

SHEET FLOORING WITH ASBESTOS FELT 1965 - 1969

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Vinyl</u>		<u>Pavillion</u>	7380	1966 - 1969
<u>Nairn</u>				7381	
				7382	
				7383	
				7384	
				7385	
				7386	
				7387	
				7388	
				7389	
				7390	
				7391	✓
			<u>Ranchero</u>	6041	1965 - 1966
				6042	
				6043	
				6044	
				6045	
				6046	
				6047	
				6049	
				6040	
				6048	
				6050	
				6051	✓
			<u>Congoleum</u>	6000	1965
			<u>Plank</u>	6001	✓
				6002	
			<u>Brittany</u>	2630	1967 - 1968
				2631	
				2632	
				2633	
				2634	
				2635	
				2636	✓

SHEET FLOORING WITH ASBESTOS FELT 1965 - 1969

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Vinyl</u>		<u>Hawaiian Coral</u>	7450	1967 - 1968
<u>Salm</u>			↓	7451	↓
✓				7452	
1969				7453	
<u>Congoleum</u>				7454	
				7455	
				7456	
				7457	
			<u>Prestige</u>	7460	1968
			↓	7461	↓
				7462	
				7563	
				7464	
				7465	
				7466	
				7467	
			<u>Palisade</u>	6430	1968 - 1969
			↓	6431	↓
				6432	
				6433	
				6434	
				6435	
				6436	
			<u>Grandeur</u>	7320	1968 - 1969
			↓	7323	↓
				7322	
				7321	
				7325	
			<u>Citadel</u>	7470	1968 - 1969
			↓	7471	↓
				7472	
				7473	
				7474	
				7475	
				7476	
				7477	
				7478	
				7479	
				7480	
			<u>Contempora</u>	7440	1969
			↓	6441	↓
				6442	
				6443	
				6444	
				6445	
				6346	

SHEET FLOORING WITH ASBESTOS FELT 1965 - 1969

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Vinyl</u>	<u>Spring</u>	<u>Colonnade</u>	7550	1967 - 1969
<u>Nairn</u>				7551	
				7552	
1969				7553	
<u>Congoleum</u>				7554	
				7555	
				7556	
				7557	
				7558	
				7559	
				7560	
				7561	
			<u>Belmondo</u>	7520	1967 - 1968
				7521	
				7522	
				7523	
				7524	
				7525	
				7526	

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Fashionflor</u> <u>Cushioned Inlaid</u> <u>vinyl</u>	<u>Fashionflor</u>	<u>Royal Court</u>	7575 7576 7577 7578 7579 7580 7581	1970 - 1973 ↓
			<u>Caliente</u>	7565 7566 7567 7568 7569	1970 - 1971 ↓
			<u>Hempstead Brick</u>	7605 7606 7607	1970 - 1973 ↓
			<u>Westbury</u>	7595 7596 7597 7598 7599 7600 7601	1970 - 1973 ↓ 1972 - 1973
			<u>Fairmont</u>	7610 7611 7612 7613	1972 - 1973 ↓
			<u>Topaz</u>	7585 7586 7587 7588 7589 7590 7591	1972 - 1973 ↓
			<u>La Mesa</u>	7620 7621 7622 7623 7624 7625	1972 - 1973 ↓

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushioned Inlaid Vinyl</u>		<u>Colonnade</u>	7550 7551 7552 7553 7556	1972 ↓
	↓				
	<u>Peerless Cushioned Vinyl</u>		<u>Majesty</u>	6500 6501 6502 6503 6504 6505 6506	1970 - 1973 ↓
	↓		↓		
			<u>Guildhall</u>	6510 6511 6512 6513	1970 - 1971 ↓
			↓		
			<u>Parkridge</u>	6520 6521 6522 6523	1970 - 1973 ↓
			↓		
			<u>El Greco</u>	4110 4111 4112 4113 4114	1971 ↓
			↓		
			<u>Hillbrook</u>	6540 6541 6542 6543 6544 6545 6546	1972 - 1973 ↓
			↓		
			<u>Janiero</u>	6550 6551 6552 6553 6554	1972 - 1973 ↓
			↓		
			↓		

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Peerless Cushioned Vinyl</u>		<u>Aquarius</u>	6530 6531 6532 6533 6534 6535 6536	1972 ↓
			<u>Custom Terrace</u>	6570 6571 6572 6573	1973 ↓
			<u>Terrace Brick</u>	6560 6561	1973 ↓
			<u>El Greco</u>	4110 4111 4112 4113 4114	1970 & 1973 ↓
			<u>Rembrandt</u>	4082 4083 4084 4085 4086 4087	1970 - 1971 ↓
			<u>Goya</u>	4100 4101 4102 4103 4104 4105 4106	1970 - 1973 ↓
			<u>Stuart</u>	4090 4091 4092	1970 - 1971 ↓
			<u>Degas</u>	4095 4096 4097	1970 ↓
	<u>Spring Luxury Cushioned Vinyl</u>				

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Spring Luxury</u> <u>Cushioned Vinyl</u>		<u>Town & Country</u>	4076 4077 4078	1970 - 1971
			↓		✓
			<u>Persian Tile</u>	4060 4061 4063 4064 4065 4066 4067 4068	1970 - 1973
			↓		✓
			<u>Brentwood</u>	4150 4151 4152	1970 - 1973
			↓		✓
			<u>Georgian Marble</u>	4040 4041 4042 4045	1970 - 1973
			↓		↓
			<u>Williamsburg</u> <u>Brick/('72/'73)</u> <u>Williamstown Brick</u>	4032 4033	1970, 1972, 1973
			<u>Holly Hill</u>	4170 4171 4172 4173 4174	1971 - 1973
			↓		✓
			<u>Casa Grande</u>	4070 4073 4075 4079 4080 4081	1971 - 1973
			↓		✓
			<u>Park Terrace</u>	4190 4191 4192 4193	1972 - 1973
			↓		✓
			<u>El Jarrin</u>	4180 4181 4182 4183 4184 4185	1972 - 1973
			↓		✓

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Spring Luxury</u> <u>Cushioned Vinyl</u>	<u>Spring</u>	<u>Sovereign</u>	4160 4161 4162 4163 4164 4165	1972
			✓		
			<u>Esteem</u>	4200 4201 4202 4203 4204	1973
			↓		
	<u>Pacemaker</u> <u>Cushioned Vinyl</u>	<u>Pacemaker</u>	<u>Lindero</u>	3170 3171 3172 3173 3174 3175	1970 - 1973
			↓		
			<u>Hacienda</u>	3180 3181 3182 3183 3184 3185	1970 - 1971
			↓		
			<u>Allura</u>	3150 3151 3152 3153 3154 3155 3156	1970 - 1973
			↓		
			<u>Parian Marble</u>	3160 3161 3162 3163 3164	1970 - 1973
			↓		
			<u>Montebello</u>	3200 3201 3202 3203 3204 3205	1970 - 1973
			✓		
			<u>Roman Accent</u>	3215 3216	1970 - 1971
			✓		

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Pacemaker</u>	<u>Pacemaker</u>	<u>Kingwood</u>	3220	1972 - 1973
	<u>Cushioned Vinyl</u>		↓	3221	1970, 1971
			<u>Village Square</u>	3225	1970 - 1973
			↓	3226	
				3227	
			↓	3228	
			<u>Green Brier</u>	3235	1971
			↓	3236	1971 - 1972
			↓	3237	
			↓	3238	
			↓	3239	✓
			<u>Del Rio</u>	3255	1972 - 1973
			↓	3256	
			↓	3257	
			↓	3258	
			↓	3259	
			↓	3260	✓
			<u>Amberley</u>	3265	1972 - 1973
			↓	3266	
			↓	3267	
			↓	3268	
			↓	3269	✓
			<u>Heirloom</u>	3245	1972
			↓	3246	
			↓	3247	
			↓	3248	
			↓	3249	
			↓	3250	
			↓	3251	✓
			<u>Sheffield Brick</u>	3090	1972 - 1973
			↓	3191	
			↓	3192	✓
			<u>Ovation</u>	3275	1973
			↓	3276	
			↓	3277	
			↓	3278	
			<u>Citadel</u>	7470	1970 - 1971
			↓	7171	
			↓	7472	
			↓	7473	
			↓	7474	
			↓	7475	
			↓	7478	
			↓	7479	
			↓	7480	
	<u>Inlaid Vinyl</u>				
	↓				

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Vinyl</u>		<u>Spanish Stone</u>	7420 7421 7421 7423 7424 7425 7427 7429	1970 - 1971
			<u>Pavillion</u>	7381 7382 7383 7387	1970
			<u>Contempora</u>	6440 6441 6442 6443 6444 6445 6446	1970 - 1971
			<u>Cabana</u>	6400 6401 6403 6405 6409 6412	1970 - 1971
	<u>Cushioned Vinyl</u>	<u>Easy Does It</u>		3601 3602 3603 3604 3605 3606 3632 3651 3670 3673 3675 3691	1970 - 1972
			<u>Now Floor</u>	10000 10001 10002 10003 10004 10005 10006 10015 10016 10017 10018	1972 - 1973

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushioned Vinyl</u>		<u>Now Floor</u>	10019 10025 10026 10027 10028 10029	1972 - 1973 1973 ✓
	↓		↓		
	<u>Cushionflor Supreme</u>		<u>Deloro</u>	9500 9501 9502 9503 9504 9505	1970 - 1973 ↓
	↓		↓		
			<u>Melody</u>	9510 9511 9512 9513 9514 9515	1970 - 1973 ↓ ✓
	↓		↓		
			<u>Paramount</u>	9520 9521 9522 9523 9524	1970 - 1971 ↓
	↓		↓		
			<u>Regal Crest</u>	9530 9531 9532 9533 9534 9535	1970 - 1973 ↓
	↓		↓		
			<u>Chelsea Brick</u>	9550 9551	1970 - 1971 ↓
	↓		↓		
			<u>Rondelle</u>	9575 9576 9577 9578 9579 9580	1972 - 1973 ↓
	↓		↓		

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushionflor Supreme</u>		<u>Coventry</u>	9565 9566 9567 9568 9569	1972 - 1973
			↓		↓
			<u>Courtland</u>	9554 9555 9556 9557 9558 9559	1972 - 1973
			↓		↓
			<u>Martinique</u>	9540 9541 9542 9543 9544 9545	1972 - 1973
			↓		↓
			<u>Keyport</u>	9595 9596 9597 9598	1973
			↓		↓
			<u>Bella Vista</u>	9585 9586 9587 9588 9589 9590	1973
			↓		↓
	<u>Vinyl Cushionflor</u>		<u>Sienna Marble</u>	8406 8407 8408 8409 8410 8411	1971 - 1973
			↓		↓
			<u>Novella</u>	8396 8397 8398 8399 8400	1971 - 1973
			↓		↓
			<u>Chaparral</u>	8465 8466 8467 8468 8469 8470	1972 - 1973
			↓		↓

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Bright & Breezy</u>	8455 8456 8457 8458 8459	1972 - 1973
			↓		↓
			<u>Corsicana</u>	8445 8446 8447 8448 8449 8450	1972 - 1973
			↓		↓
			<u>Bellaire</u>	8435 8436 8437 8438 8439	1972 - 1973
			↓		↓
			<u>Graphic</u>	8425 8426 8427 8428 8429	1972
			↓		↓
			<u>Sumatra</u>	8415 8416 8417 8418 8419 8420 8421	1972 - 1973
			↓		↓
			<u>Safari</u>	8380	1972 - 1973
			<u>Spanish Motif</u>	8342 8343	1972
			↓		↓
			<u>Fairfield</u>	8260 8262 8264	1972
			↓		↓
			<u>Coraltone</u>	8215 8217 8218 8221 8223	1972 - 1973
			↓		↓

SHEET FLOORING WITH ASBESTOS FELT 1970 - 1973

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Navara</u>	8181	1972
			↓	8182	
				8183	✓
			<u>Monaco</u>	8142	1972
			↓	8143	✓
			<u>Georgetown Brick</u>	8211	1972 - 1973
			↓	8212	✓
			<u>Parquet</u>	8110	1972 - 1973
			<u>Malamar</u>	8134	1972 - 1973
			↓	8135	
				8137	✓
			<u>Fieldstone</u>	8060	1972 - 1973
			<u>Cobblestone</u>	8047	1972 - 1973
			<u>San Mateo</u>	8475	1973
			↓	8476	
				8477	
				8478	
				8479	
				8480	
			↓	8481	✓

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Reflection</u>	<u>Reflection</u>	<u>Espana</u>	20000 20001 20002 20003 20004 20005	1974 - 1975
			↓		
			<u>Palace Court</u>	20010 20011 20012 20013 20014 20015	1974 - 1976
			↓		
			<u>Hearthside</u>	20020 20021 20022 20023 20024	1974 - 1976
			↓		
			<u>Monoco</u>	20029 20030 20031 20032 20033 20034	1975, 1976
			↓		
	<u>Reflection 2</u>	<u>Reflection 2</u>	<u>Camelot</u>	24040 24041 24042 24043 24044 24045	1976
			↓		
			<u>Colonnade</u>	24020 24021 24022 24023 24024	1976, 1977
			↓		
			<u>Espana</u>	24030 24031 24032 24033 24034	1977
			↓		
			<u>Palace Court</u>	24010 24011 24012 24013	1977
			↓		

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Prestige</u>	<u>Prestige</u>	<u>Persian Accent</u>	45028 45029 45030 45031	1976, 1977
			↓		
			<u>Colonial Charm</u>	45021 45022 45023 45024 45025	1976, 1977
			↓		
			<u>African Mood</u>	45010 45011 45012 45013	1976, 1977
			↓		
			<u>European Profile</u>	45016 45017 45018	1976, 1977
			↓		
			<u>Roman Elegance</u>	45000 45001 45002 45003 45004	1976, 1977
			↓		
			<u>Oriental Majesty</u>	45007 45008	1976
			↓		
			<u>Amsterdam Square</u>	45035 45036 45037 45038	1977
			↓		
	<u>New Dimension Cushioned Vinyl</u>	<u>New Dimension</u>	<u>Monterrey</u>	7500 7501 7502 7503 7504 7505	1974
			↓		
			<u>Spanish Villa</u>	7520 7521 7522 7523 7524 7525	1974, 1975
			↓		
			<u>Dorian Marble</u>	7510 7511 7512 7513 7514	1974, 1975
			↓		

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>New Dimension</u> <u>Cushioned Vinyl</u>	<u>New Dimension</u>	<u>Barrington Court</u>	7540 7541 7542 7543 7544	1975
	↓	↓	↓		
			<u>Pavillion</u>	7550 7551 7552 7553 7554	1976
			↓		
	<u>Highlight</u> <u>Cushioned Vinyl</u>	<u>Highlight</u>	<u>Martinique</u>	40000 40001 40002 40003 40004	1976, 1977
	↓	↓	↓		
			<u>Brazilian Tile</u>	40010 40011 40012 40013 40014 40015	1976, 1977
			↓		
			<u>Cristallo</u>	40020 40021 40022 40023 40024 40025	1976, 1977
			↓		
			<u>Gracefield</u>	40030 40031 40032 40033 40034	1977
			↓		
	<u>Fashionflor</u> <u>Cushioned Vinyl</u>	<u>Fashionflor</u>	<u>Hempstead Brick</u>	2500 2501 2502 7605 7606 7607	1974 - 1977
	↓	↓	↓		
			<u>La Mesa</u>	7620 7621 7622 7623 7624 7625 2534 2535	1974
			↓		

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Fashionflor</u> <u>Cushioned Vinyl</u>	<u>Fashionflor</u>	<u>Royal Court</u>	7575 7576 7578 7581 2505 2506 2507	1974 - 1976 ↓
			<u>Topaz</u>	7585 7587 7588 7590 2514 2515 2516	1974 - 1977 ↓
			<u>Westbury</u>	7595 7596 7596 7597 7598 7599 2524 2525 2526	1974 - 1977 ↓
			<u>Manorwood</u>	2544 2545 2546	1976 ↓
			<u>Hearthside</u>	2549 2550 2551 2552	1977 ↓
			<u>Woodbridge</u>	2555 2556 2557 2558 2559 2560	1977 ↓
			<u>Torrington</u>	2563 2564 2565 2566	1977 ↓
	<u>Peerless</u> <u>Cushioned Vinyl</u>	<u>Peerless</u>	<u>Hillbrook</u>	6540 6541 6542 6543 6544 6545 6546	1974 - 1977 ↓

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Peerless</u> <u>Cushioned Vinyl</u>	<u>Peerless</u>	<u>Janiero</u> ↓	6550 6551 6552 6553 6554	1974 - 1977 ✓
			<u>Terrace Brick</u> ↓	6560 6561	1974 - 1979 ✓
			<u>Custom Terrace</u> ↓	6570 6571 6572 6573	1974, 1975 ✓
			<u>Adrian Hall</u> ↓	6580 6581 6582 6583 6584 6585 6586	1974 - 1977 ✓
			<u>Messina</u> ↓	6590 6591 6592 6593 6594	1975 - 1977 ✓
			<u>Carillon</u> ↓	6514 6515 6516	1976, 1977 ✓
	<u>Spring Luxury</u> <u>Cushioned Vinyl</u>	<u>Spring</u>	<u>Georgian Marble</u> ↓	4041 4042	1974 - 1977 ✓
			<u>Persian Tile</u> ↓	4060 4063 4064 4065 4066 4068	1974 - 1976 ✓
			<u>Casa Grande</u> ↓	4070 4073 4075 4079	1974, 1975 ✓

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Spring Luxury</u> <u>Cushioned Vinyl</u>	<u>Spring</u>	<u>El Greco</u>	4110 4111 4112 4113 4114 4115 4116 4117 4118	1974 - 1976 ↓
			<u>Brentwood</u>	4150 4151 4152	1974 - 1977 ↓
			<u>Holly Hill</u>	4170 4171 4172 4173 4174	1974 - 1977 ↓
			<u>El Tarrin</u>	4180 4181 4182 4183 4184 4185	1974 - 1977 ↓
			<u>Park Terrace</u>	4190 4191 4192 4193	1974 - 1977 ↓
			<u>Esteem</u>	4200 4201 4202 4203 4204	1974 ↓
	<u>Spring</u>	<u>Spring</u>	<u>Mission Oak</u>	4210 4211 4212 4213	1974 - 1977 ↓
			<u>Americana</u>	4220 4221 4222 4226 4227 4228 4232	1974, 1975 ↓

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Spring</u>	<u>Spring</u>	<u>Jamestown Brick</u>	4235 4236 4237	1974 - 1977
			<u>Dutch Tile</u>	4220 4121 4122 4123 4124	1975 - 1977
			<u>El Camino</u>	4130 4131 4132 4133 4134 4135 4136 4137	1976, 1977
			<u>Colony Square</u>	15000 15001 15002 15003 15004 15005	1976, 1977
			<u>Corsicana</u>	15010 15011 15012 15013 15014	1976, 1977
			<u>Castle Harbor</u>	15018 15019 15020 15021 15022 15023	1977
			<u>Allura</u>	3150 3151 3152 3153 3154 3155 3156	1974 - 1976
			<u>Parian Marble</u>	3160 3161 3162 3163 3164	1974 - 1977
	<u>Spacemaker wide width</u>				
	<u>Pacemaker Cushioned Vinyl</u>	<u>Pacemaker</u>			

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Pacemaker</u>	<u>Pacemaker</u>	<u>Lindero</u>	3172 3173 3174	1974 - 1977 ✓
			↓		
			<u>Sheffield Brick</u>	3190 3191 3192	1974, 1975 ↓
			↓		
			<u>Montebello</u>	3200 3201 3202 3203 3204 3205	1974 - 1977 ↓
			↓		
			<u>Kingwood</u>	3220 3221	1974 - 1977 ↓
			✓		
			<u>Village Square</u>	3225 3226 3227 3228	1974 - 1977 ↓
			↓		
			<u>Del Rio</u>	3255 3256 3257 3258 3259 3260	1974 - 1977 ↓
			↓		
			<u>Amberley</u>	3265 3266 3267 3268 3269	1974, 1975 ↓
			✓		
			<u>Ovation</u>	3275 3276 3277 3278	1974 ↓
			↓		
			<u>Torino</u>	3285 3286 3287 3288 3289 3290	1974 - 1977 ↓
			↓		

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Pacemaker</u>	<u>Pacemaker</u>	<u>Corvallis</u>	3295 3296 3297 3298	1975 - 1977
			↓		
			<u>Westfield</u>	3305 3306 3308	1975
			↓		
			<u>Plymouth Brick</u>	3208 3209 3210	1976, 1977
			↓		
			<u>Flamenco</u>	3310 3311 3312 3313 3314	1977
			↓		
			<u>Brookdale</u>	3320 3321 3322 3323 3324	1977
			↓		
	↓	↓			
	<u>Cushioned Vinyl</u>	<u>Cushioned Vinyl</u>	<u>The Now Floor</u>	10000 10001 10002 10003 10004 10005 10006 10015 10016 10017 10018 10019 10025 10026 10027 10028 10029 10035 10036 10037 10038 10039 10040	1974, 1975
	↓	↓	↓		

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>The Now Floor</u> <u>Cushioned Vinyl</u>	<u>The Now Floor</u>	<u>Accent</u>	10000 10001 10002 10003 10004 10005 10006	1976, 1977
			<u>Safari</u>	10008 10009	1976, 1977
			<u>Now Flower</u>	10025 10026 10027 10028 10029	1976, 1977
			<u>Horizon</u>		1976, 1977
				10035 10036 10037 10038 10039 10040	
			<u>Playland</u>	10048 10049 10050	1976, 1977
			<u>Deloro</u>	9500 9501 9502 9503 9504 9505	1974 - 1977
			<u>Melody</u>	9510 9512 9515	1974 - 1977
			<u>Regal Crest</u>	9530 9531 9532 9533 9534 9535	1974 - 1977
	<u>Cushionflor</u> <u>Supreme</u>	<u>Cushionflor</u> <u>Supreme</u>			

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushionflor</u>	<u>Cushionflor</u>	<u>Martinique</u>	9540	1974
	<u>Supreme</u>	<u>Supreme</u>	↓	9541	
			↓	9542	
			↓	9543	
			↓	9544	
			↓	9545	
			<u>Chelsea Brick</u>	9550	1974 - 1977
			↓	9551	
			<u>Courtland</u>	9554	1974 - 1977
			↓	9556	
			↓	9559	
			<u>Coventry</u>	9565	1974 - 1977
			↓	9566	
			↓	9567	
			↓	9568	
			↓	9569	
			<u>Rondelle</u>	9576	1974 - 1977
			↓	9577	
			↓	9578	
			<u>Belle Vista</u>	9586	1974, 1975
			↓	9587	
			↓	9588	
			↓	9589	
			↓	9590	
			<u>Keyport</u>	9595	1974
			↓	9596	
			↓	9597	
			↓	9598	
			<u>Venetian Tile</u>	9605	1974, 1975
			↓	9606	
			↓	9607	
			↓	9608	
			↓	9609	
			↓	9610	
			<u>Kensington</u>	9615	1974 - 1977
			↓	9616	
			↓	9617	
			↓	9618	
			↓	9619	
			↓	9620	
			<u>Harbor Mist</u>	9625	1975
			↓	9626	
			↓	9627	
			↓	9628	

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushionflor</u> <u>Supreme</u>	<u>Cushionflor</u> <u>Supreme</u>	<u>Court Stone</u>	9633 9634 9635 9636 9637	1976, 1977
			↓		
			<u>Brandywine</u>	9640 9641 9642 9643 9644 9645	1976, 1977
			↓		
			<u>Calcutta</u>	9650 9651 9652 9653 9654 9655	1977
			↓		
			<u>Troy Hills</u>	9660 9661 9662 9663 9664	1977
			↓		
			<u>Flor-Ever</u>	50000 50001 50002 50003 50004 50005 50006 50007	1977
			↓		
			<u>Cobbletone</u>	8047	1974
			↓		
			<u>Fieldstone</u>	3060	1974
			↓		
			<u>Parquet</u>	8110 8114	1974 - 1977
			↓		
			<u>Malamar</u>	8134 8135 8137	1974 - 1977
			↓		
			<u>Laurel Wood</u>	8000 8001 8002 8003 8004	1976, 1977
			↓		
	<u>Commercial Vinyl</u> <u>Flooring</u>				
	↓				
	<u>Vinyl Cushionflor</u>				
	↓				

ASBESTOS SHEET FLOORING

1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Coraltone</u>	8215 8217 8218 8221 8223	1976 - 1977
			↓		
			<u>Georgetown Brick</u>	8211 8212	1974 - 1977
			✓ <u>Fairfield</u>	8260 8262 8264	1974 - 1977
			↓ <u>Safari</u>	8380	1974, 1975
			↓ <u>Murano</u>	8280 8281 8283	1974 - 1976
			↓ <u>Sienna Marble</u>	8409 8410	1974
			↓ <u>Sumatra</u>	8415 8417 8420 8421	1974, 1975
			↓ <u>Bellaire</u>	8435 8436 8438	1974 - 1976
			↓ <u>Corsicana</u>	8445 8446 8447 8448 8449 8450	1974
			↓ <u>Novella</u>	8397 8399	1974, 1975
			↓ <u>Chaparral</u>	8465 8467 8469 8470	1974
			↓ <u>San Mateo</u>	8475 8476 8477 8478 8479 8480 8481	1974 - 1977

ASBESTOS SHEET FLOORING 1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Hollydale</u>	8485 8486 8487 8488 8489	1974 - 1977
	↓		↓		
	<u>Vinyl Cushioned</u>		<u>Windsor</u>	8495 8496 8497 8498 8499	1974 - 1977
	↓		↓		
			<u>Gardena</u>	8800 8801 8802	1974 - 1977
			↓		
			<u>San Juan</u>	8810 8811 8812 8813 8814	1975 - 1977
			↓		
			<u>Willow Springs</u>	8830 8831 8832 8833 8834	1975 - 1977
			↓		
			<u>Crestmont</u>	8100 8101 8102 8103 8104	1976, 1977
			↓		
			<u>Damascus</u>	8819 8820 8821 8822 8823 8824	1976
			↓		
			<u>Fair Haven</u>	8808 8809 8010 8011 8012 8013	1977
			↓		
			<u>Hawaiian Dream</u>	8015 8016 8017 8018	1977

ASBESTOS SHEET FLOORING 1974 - 1977

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Summer Picnic</u>	8030	1977
	↓		↓	8031	
				8032	
				8033	
				8034	

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Cushioned Vinyl</u>	<u>Reflection 2</u>	<u>Palace Court</u>	24010 24011 24012 24013	1978 - 1980 ↓
			<u>Espana</u>	24030 24032 24033	1978 - 1979 ↓
			<u>Pennhurst</u>	24060 24061 24062 24063 24064 24065	1978 - 1980 ↓
			<u>Camelot</u>	24070 24071 24072 24073 24074 24075	1978 ↓
			<u>Italian Terrazzo</u>	24080 24081 24082 24083 24084	1979, 1980 ↓
			<u>Willowbrook</u>	24090 24091 24092 24093 24094	1980 ↓
		<u>Fashionflor</u>	<u>Hempstead Brick</u>	2500 2501 2502 2503 2504	1978 - 1980 ↓
			<u>Topaz</u>	2572 2573	1978 - 1980 ↓
			<u>Westbury</u>	2524 2525	1978 - 1980 ↓
			<u>La Mesa</u>	2534	1978
			<u>Hearthside</u>	2549 2550 2551 2552	1978 - 1980 ↓

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Cushioned Vinyl</u>	<u>Fashionflor</u>	<u>Woodbridge</u>	2555 2556 2557 2558 2559 2560	1975 ↓
			↓ <u>Torrington</u>	2563 2564 2565 2566	1975 - 1980 ↓
			↓ <u>Chesterfield</u>	2580 2581 2582 2583 2584 2585	1979, 1980 ↓
			↓ <u>Union Square</u>	2588 2589 2590 2591 2592	1979, 1980 ↓
	↓ <u>Cushioned Vinyl</u>	↓ <u>Prestige</u>	↓ <u>Roman Elegance</u>	45000 45001 45002 45003 45004	1978 - 1980 ↓
			↓ <u>European Profile</u>	45016 45017	1978 ↓
			↓ <u>Colonial Charm</u>	45022 45023 45025	1978 - 1980 ↓
			↓ <u>Trinity Harbor</u>	45045 45046 45047 45048 45049 45050	1978 - 1980 ↓
			↓ <u>Casa Grande</u>	45055 45056 45057 45058 45059 45060 45061	1979, 1980 ↓

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Inlaid Cushioned Vinyl</u>	<u>FashionFlor</u>	<u>Geneva Court</u>	4506 45068 45069 45070 45071	1979 ↓ ↓ ↓ ↓
	<u>Spacemaker Seamless Cushioned Vinyl</u>	<u>Spacemaker</u>	<u>Colony Square</u>	15000 15001 15002 15003	1978 ↓ ↓ ↓
			<u>Corsticana</u>	15010 15011 15012	1978 ↓ ↓
			<u>Castle Harbor</u>	15018 15019 15020 15021 15022 15023	1978 ↓ ↓ ↓ ↓ ↓
			<u>Fashion Wood</u>	15027 15028 15029	1978 ↓ ↓
	<u>Spring Luxury Cushioned Vinyl</u>	<u>Spring</u>	<u>Dutch Tile</u>	4120 4121 4122	1978 ↓ ↓
			<u>Georgian Marble</u>	4041 4042	1978 ↓
			<u>Brentwood</u>	4150 4151	1978, 1979 ↓
			<u>Holly Hill</u>	4173	1978 ↓
			<u>El Camino</u>	4132 4134 4136 4137	1978, 1979 ↓ ↓ ↓
			<u>El Tannin</u>	4181 4183 4184	1978 ↓ ↓
			<u>Park Terrace</u>	4190 4192 4193 4197 4198 4199	1978 - 1980 ↓ ↓ ↓ ↓ ↓

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Spring Luxury</u> <u>cushioned Vinyl</u>	<u>Spring</u>	<u>Mission Oak</u>	4210 4212 4214	1978 - 1980
			↓		↓
			<u>Jamestown Brick</u>	4235 4236 4233	1978 - 1980
			↓		↓
			<u>Castle Harbor</u>	4010 4011 4012 4013 4014 4015	1979, 1980
			↓		↓
			<u>Fashion Wood</u>	4020 4021 4022	1979, 1980
			↓		↓
	<u>Highlight</u> <u>Cushioned Vinyl</u>	<u>Highlight</u>	<u>Martinique</u>	40000 40001 40002 40003 40004	1978 - 1980
			↓		↓
			<u>Cristallo</u>	41122 40023 40025 40026 40027 40028	1978 - 1980
			↓		↓
			<u>Coral Springs</u>	40040 40041 40042 40043 40044	1978 - 1980
			↓		↓
			<u>Town & Country</u>	40050 40051 40052 40053 40054 40055 40056	1979, 1980
			↓		↓
			<u>Calverez</u>	40061 40062 40063 40064 40065	1979, 1980

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Highlight Cushioned Vinyl</u>	<u>Highlight</u>	<u>Bay Stone</u>	40070 40071 40072 40073 40074	1980 ↓
	↓	↓	↓		
	<u>Cushionflor Supreme</u>		<u>Melody</u>	9510 9512 9513 9515	1978 - 1980 ↓
	↓		↓		
			<u>Regal Crest</u>	9533 9534 9535	1978 - 1980 ↓
			↓		
			<u>Chelsea Brick</u>	9550 9551	1978 - 1980 ↓
			↓		
			<u>Courtland</u>	9554 9559	1978 - 1980 ✓
			↓		
			<u>Coventry</u>	9565 9567	1978 - 1980 ↓
			↓		
			<u>Rondelle</u>	9576 9578	1978 - 1980 ↓
			↓		
			<u>Kensington</u>	9616 9618 9619 6620	1978 - 1980 ↓
			↓		
			<u>Court Stone</u>	9634 9635 9636	1978 - 1980 ↓
			↓		
			<u>Brandywine</u>	9640 9641 9642 9644	1978 - 1980 ↓
			↓		
			<u>Calcutta</u>	9650 9651 9652 9653	1978 - 1980 ↓
			↓		
			<u>Somerset</u>	9665 9666 9667 9668 9669 9670	1978, 1979 ↓

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushionflor</u> <u>Supreme</u>		<u>Torentino</u>	9675 9676 9677 9678 9679	1979, 1980 ↓
	↓		↓		
			<u>Essex Square</u>	9520 9521 9522 9523 9524	1980 ↓ ✓
			↓		
	<u>Pacemaker</u> <u>Cushioned Vinyl</u>	<u>Pacemaker</u>	<u>Parian Marble</u>	3193 3194 3195 3196	1978, 1979 ↓
	↓	↓	↓		
			<u>Plymouth Brick</u>	3208 3209 3210	1978 - 1980 ↓
			↓		
			<u>Lindero</u>	3173 3174	1978 ↓
			↓		
			<u>Kingwood</u>	3220 3221	1978 - 1980 ↓
			↓		
			<u>Torino</u>	3285 3286 3289 3290	1978 - 1980 ↓
			↓		
			<u>Corvallis</u>	3295 3296 3297	1978, 1979 ↓
			↓		
			<u>Brookdale</u>	3320 3321 3322 3323 3324	1978 - 1980 ↓ ✓
			↓		
			<u>Village Square</u>	3326 3327 3328 3329	1978 - 1980 ↓
	↓	↓	↓		

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Cushionflor</u>		<u>Malamar</u>	8135 8137	1973 - 1980 ↓
			↓		
			<u>Georgetown Brick</u>	8209 8212	1978 - 1980 ↓
			↓		
			<u>Coraltone</u>	8215 8217 8218 8223	1973 - 1980 ✓
			↓		
	<u>Vinyl Cushionflor</u>		<u>Fairfield</u>	8260 8262 8264	1978 - 1980 ↓
			↓		
			<u>Hollydale</u>	8487 8489	1978 - 1980 ↓
			↓		
			<u>Windsor</u>	8495 8496 8497 8498 8499	1978 - 1980 ✓
			✓		
			<u>Gardena</u>	8800 8801 8802	1978 - 1980 ✓
			✓		
			<u>Willow Springs</u>	8832 8833 8834	1978 - 1979 ↓
			↓		
			<u>Maple Knolls</u>	8019 8020 8021	1979, 1980 ↓
			↓		
			<u>Fontana</u>	8036 8037 8038 8039 8040	1979, 1980 ↓
			↓		
			<u>English Brick</u>	8079 8080 8081 8082 8083	1979, 1980 ↓
			↓		
			✓		

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Conzoleum</u>	<u>Pacemaker</u> <u>Cushioned Vinyl</u>	<u>Pacemaker</u>	<u>Cedar Grove</u>	3235 3236 3237 3238 3239 3240	1979, 1980 ↓
	↓		<u>Spring Valley</u>	3335 3336 3337 3338	1979, 1980 ↓
	<u>Cushionflor</u>		<u>Pasadena</u>	8050 8051 8052 8053 8054	1978 - 1980 ↓
	↓		<u>Crestmont</u>	8101 8102 8104	1978 - 1980 ↓
			<u>Parquet</u>	8110 8114	1978 - 1980 ↓
			<u>San Mateo</u>	8478 8480	1978 ↓
			<u>Jericho Square</u>	8120 8121 8122 8123 8124 8125	1978 ↓

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Vinyl Cushionflor</u>		<u>Bellaire</u>	3190 3191 3192 3193 3194	1980
	↓		↓		
	<u>Flor-Ever</u> <u>Commercial Vinyl</u>	<u>Flor-Ever</u>	<u>Marble</u>	50000 50001 50002 50003 50004 50005	1978 - 1980
	↓	↓	↓		
			<u>Travertine</u>	50012 50013 50014 50015	1978 - 1980
			↓		
			<u>Inverrary</u>	50020 50021 50022 50023 50024 50025	1980
			↓		
	<u>Dynasty Vinyl</u>		<u>Arden Marble</u>	12000 12001 12003 12003 12004 12005 12002	1979, 1980
	↓		↓		
			<u>Camarillo</u>	12011 12012 12013 12014 12015	1979, 1980
			↓		
	<u>Villager Vinyl</u>		<u>Fairlawn</u>	6100 6101 6102 6103	1979, 1980
	↓		↓		
			<u>Barclay Square</u>	6110 6111 6112 6113 6114 6115	1979, 1980

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Villager Vinyl</u>		<u>Harmony Court</u>	6121 6122 6123 6124 6125	1979, 1980
	↓		↓		
			<u>Claremont</u>	6130 6131 6132 6133 6134	1978
			↓		
	<u>Builderflor</u>		<u>Seascape</u>	2001 2002 2003	1979, 1980
	↓		↓		
			<u>San Paulo</u>	2010 2011 2012 2013 2014	1979, 1980
			↓		↓
			<u>Briley Park</u>	2038 2041	1979, 1980
			↓		
			<u>Town Brook</u>	2047 2048 2049 2050	1979, 1980
			↓		
	<u>Ultraflor Esteem</u>		<u>Fairmont</u>	62010 62011 62012 62013 62014 62015	1980
	↓		↓		↓
			<u>Monterrey</u>	62026 62031	1980
			↓		
	<u>Ultraflor Imperial</u>		<u>Sebring</u>	61000 61001 61002	1980
	↓		↓		
			<u>Royal Gallery</u>	61006 61007	1980
			↓		
	<u>Ultraflor Majestic</u>		<u>Cameo</u>	60016 60017 60018 60019	1980
	↓		↓		

SHEET FLOORING WITH ASBESTOS FELT 1978 - 1980

<u>Manufacture</u>	<u>Family</u>	<u>Commodity</u>	<u>Pattern</u>	<u>Colors</u>	<u>Years</u>
<u>Congoleum</u>	<u>Ultraflor Majestic</u>		<u>Romanaire</u>	60000	1980
	↓		↓	60001	
				60002	
				60003	
				60010	
				60011	
				60012	✓
	<u>Ultraflor Regal</u>		<u>Kentucky Manor</u>	57000	1980
	↓		↓	57001	
			✓	57002	
				57003	✓

ASBESTOS SHEET FLOORING 1981 - 83

Manufacture Congoleum	Family Ultraflor <u>Esteem</u>	Commodity Ultrafloor <u>Esteem</u>	Pattern Oriental <u>Majesty</u>	Colors 62000 ↓ 05	Years 1981 - 83 ↓
			<u>Fairmont</u>	62010 ↓ 15	1981 - 83 ↓
			<u>Monaco</u>	62020 ↓ 25	1981 - 83 ↓
			<u>Monterrey</u>	62026 ↓ 31	1981 - 82 ↓
			<u>Grandview</u>	62037 ↓ 41	1982 - 83 ↓
			<u>Lawrenceville</u>	62025 ↓ 50	1983 ↓
			<u>Versailles</u>	62054 ↓ 59	1983 ↓

Ultraflor	Ultraflor <u>Imperial</u>	<u>Sebring</u>	61000 01 02	1981 - 83 ↓
		<u>Royal Gallery</u>	61006 07	1981 - 83 ↓
		<u>Wyndemere</u>	61010 ↓ 14	1982 - 83 ↓
		<u>La Mesa</u>	61018 ↓ 22	1982 - 83 ↓
		<u>Palisade</u>	61026 ↓ 30	1982 - 83 ↓
		<u>Sienna</u>	61037 ↓ 39	1982 - 83 ↓
		<u>Old Forge</u>	61043 ↓ 46	1983 ↓

Ult lor Majestic	Ultraflor Majestic	<u>Cameo</u>	60016 ↓ 19	1981 ↓
		<u>Romanaire</u>	60000 ↓ 03	1981 ↓
			60010 11 12	↓
Ultraflor <u>Regal</u>	Ultraflor <u>Regal</u>	<u>Kentucky Manor</u>	57000 ↓ 03	1981 - 82 ↓
Reflection	<u>Reflection</u>	<u>Palace</u>	24010 11 13	1981 ↓
		<u>Pennhurst</u>	24061 63	1981 ↓
		<u>Italian Terrazzo</u>	24080 81 83 84	1981 ↓
		<u>Willow Brook</u>	24090 ↓ 93	1981 ↓
Fashionflor	<u>Fashionflor</u>	<u>Hempstead Brick</u>	2500 03 04	1981 - 83 ↓
		<u>Westbury</u>	2524 25	1981 - 82 ↓
		<u>Hearth Side</u>	2549 50	1981 - 82 ↓
		<u>Torrington</u>	2563 ↓ 66	1981 - 83 ↓
		<u>Topaz</u>	2572 73	1981 - 83 ↓
		<u>Chesterfield</u>	2580 82 84 85	1981 - 83 ↓
		<u>Union Square</u>	2588 89 90 2592	1981 - 83 ↓

Prestige	Prestige	Roman <u>Elegance</u>	45000 ↓ 04	1981 - 83 ↓
		Colonial <u>Charm</u>	45022 23 25	1981 - 82 ↓
		Trinity <u>Harbor</u>	45047 48 50	1981 - 82 ↓
		Casa <u>Grande</u>	45056 ↓ 61	1981 ↓
		<u>Clabourne</u>	45076 ↓ 81	1981 - 83 ↓
		Union <u>Grove</u>	45085 ↓ 90	1982 - 83 ↓
		<u>Ventura</u>	45094 ↓ 98	1982 - 83 ↓
		<u>Sedgefield</u>	45101 ↓ 5	1983 ↓
		<u>Allura</u>	45110 ↓ 5	1983 ↓
Dynasty	Dynasty	Arden <u>Marble</u>	12000 1 3 4 5	1981 - 82 ↓
		<u>Camarillo</u>	12011 ↓ 15	1981 - 82 ↓
		Country <u>Wood</u>	12030 ↓ 33	1983 ↓
Pavillion	Pavillion	<u>Americana</u>	52000 ↓ 5	1983 ↓
		<u>Woodmont</u>	52009 10	1983 ↓

<u>Pavillion</u>	<u>Pavillion</u>	<u>Citadel</u>	52016 ↓ 20	1983 ↓
		<u>Gracefield</u>	52024 ↓ 28	1983 ↓
		<u>Chadwick</u>	52031 ↓ 35	1983 ↓
		<u>English Tapestry</u>	52038 ↓ 42	1983 ↓
<u>Spring</u>	<u>Spring</u>	<u>Castle Harbor</u>	4010 11 13 14 15	1981 - 83 ↓
		<u>Fashion Wood</u>	4021 22	1981 - 82 ↓
		<u>Park Terrace</u>	4190 92 93 97 99	1981 - 83 ↓
		<u>Mission Oak</u>	4210 12 14	1981 - 83 ↓
		<u>Jamestown Brick</u>	4233 34 35	1981 - 83 ↓
		<u>Chester Ridge</u>	4240 ↓ 44	1981 - 82 ↓
		<u>Colonnade</u>	4250 ↓ 54	1981 - 83 ↓
		<u>Caliente</u>	4260 ↓ 65	1982 - 83 ↓
		<u>Quail Ridge</u>	4270 ↓ 74	1983 ↓
		<u>Brinwood</u>	4280 81	1983 ↓

<u>Spring</u>	<u>Spring</u>	<u>Cabana</u>	4285 ↓ 88	1983 ↓
<u>Highlight</u>	<u>Highlight</u>	<u>Martinique</u>	40000 1 2 4	1981 - 82 ↓
		<u>Cristallo</u>	40022 23 25 28 26	1981 - 83 ↓
		<u>Coral Springs</u>	40040 41 43 44	1981 - 83 ↓
		<u>Town & Country</u>	40050 51 53 56	1981 - 83 ↓
		<u>Calverez</u>	40061 65	1981 - 82 ↓
		<u>Brittany</u>	40075 78	1981 - 82 ↓
		<u>Country Hearth</u>	40090 94	1982 - 83 ↓
		<u>Pennington Square</u>	40106 110	1982 - 83 ↓
		<u>Parthenon</u>	40100 103	1983 ↓
		<u>Meadow View</u>	40115 9	1983 ↓
		<u>Carillon</u>	40130 130	1983 ↓
<u>Cushionflor Supreme</u>	<u>Cushionflor Supreme</u>	<u>Regal Crest</u>	9533	1981 - 82

Cushionflor	Cushionflor	<u>Chelsea</u>	9550	1981 - 82
		<u>Brick</u>	51	↓
		<u>Courtland</u>	9554	1981 - 83
		<u>Coventry</u>	9565	1981 - 83
			67	↓
		<u>Rondelle</u>	9576	1981 - 83
			78	↓
		<u>Brandywine</u>	9640	1981 - 82
			41	↓
			42	↓
			44	↓
		<u>Calcutta</u>	9650	1981 - 83
			53	↓
		<u>Torantino</u>	9676	1981 - 83
			79	↓
		<u>Classic</u>	9680	1982 - 83
		<u>Elegance</u>	84	↓
		<u>Strathmore</u>	9688	1982 - 83
			92	↓
Villager	<u>Villager</u>	<u>Fairlawn</u>	6100	1981 - 82
			02	↓
			03	↓
		<u>Barclay</u>	6111	1981 - 82
		<u>Square</u>	3	↓
			4	↓
			5	↓
		<u>Harmony</u>	6121	1981 - 82
		<u>Court</u>	25	↓
Pacemaker	<u>Pacemaker</u>	<u>Plymouth</u>	3208	1981 - 82
		<u>Brick</u>	9	↓
Pacemaker 2 ('83)		<u>Kingwood</u>	3220	1981 - 83
			21	↓
		<u>Cedar Grove</u>	3235	1981 - 82
			6	↓
			8	↓
			9	↓
		<u>Torino</u>	3289	1981 - 83
			90	↓

<u>Manorwood</u>	3186 7	1982 ↓
<u>Brookdale</u>	3321 3 4	1981 - 83 ↓
<u>Village Square</u>	3327 9	1981 - 83 ↓
<u>Spring Valley</u>	3335 ↓ 8	1981 - 83 ↓
<u>Ralston Park</u>	3344 ↓ 48	1981 - 83 ↓
<u>Harmony Court</u>	3230 ↓ 34	1983 ↓
<u>Fairlawn</u>	3280 ↓ 3	1983 ↓
<u>Shelby Court</u>	3299 ↓ 3303	1983 ↓
<u>Brecken-Ridge</u>	3360 1	1983 ↓
<u>Country Lane</u>	3367 ↓ 70	1983 ↓

<u>Profile</u>	<u>Profile</u>			
↓	↓	<u>Harbor Hill</u>	7200 1 2	1981 - 83 ↓
		<u>Amberly</u>	7206 ↓ 10	1981 - 83 ↓
		<u>Wimbledon</u>	7213 ↓ 17	1981 - 83 ↓
		<u>Ashford</u>	7226 ↓ 24	1981 - 83 ↓
		<u>Ashlyn Hall</u>	7228 ↓ 33	1982 ↓

		<u>Addison</u>	7236 ↓ 39	1983 ↓
<u>Vinyl Cushionflor</u>	<u>Vinyl Cushionflor</u>	<u>Maple Knolls</u>	8019 21	1981 ↓
		<u>Fontana</u>	8036 ↓ 40	1981 - 82 ↓
		<u>Cobblestone</u>	8045 ↓ 49	1981 ↓
		<u>Venetian Tile</u>	8084 ↓ 88	1981 - 83 ↓
		<u>Crestmont</u>	8101 4	1981 - 83 ↓
		<u>Parquet</u>	8110 4	1981 - 83 ↓
		<u>Bellaire</u>	8190 ↓ 4	1981 - 83 ↓
		<u>Swiss Tile</u>	8073 ↓ 7	1983 ↓
		<u>Catalina</u>	8225 ↓ 9	1981 - 82 ↓
		<u>Coralstone</u>	8215 7 8 23	1981 - 83 ↓
		<u>Georgetown Brick</u>	8209 12	1981 ↓
		<u>Fairfield</u>	8260 2 4 5 6	1981 - 83 ↓
		<u>Hollydale</u>	8487	1981
		<u>Gardenia</u>	8800	1981
		<u>Windsor</u>	8495 9	1981 ↓

<u>Capetown</u>	8316	1982 - 83
	↓ 20	↓
<u>Hollyhill</u>	8323	1982 - 83
	↓ 27	↓
<u>Timberlane</u>	8805	1983
	↓ 6	↓
<u>Devonshire</u>	8843	1983
	↓ 47	↓

<u>Flor-Ever</u>	<u>Flor-Ever</u>	<u>Marble</u>	50000	1981 - 83
↓	↓		↓ 5	↓
		<u>Inverrary</u>	50020	1981 - 83
			↓ 25	↓
		<u>Stanhope</u>	50030	1983
			↓ 35	↓
		<u>Sedona</u>	50040	1983
			↓ 43	↓

<u>TERM</u>	<u>CARRIER</u>	<u>POLICY #</u>	<u>EACH OCCURRENCE</u>	<u>AGGREGATE</u>
1926-1/70	Liberty Mutual	LGI-632-004138-	unknown	unknown
1/70-1/71	Liberty Mutual	LGI-632-004138-040	100,000	100,000
1/71-1/72	Liberty Mutual	LGI-632-004138-041	100,000	100,000
1/72-1/73	Liberty Mutual	LGI-632-004138-042	100,000	100,000
1/73-3/76	Wausau	052--00-084282	1,000,000	1,000,000
3/76-1/77	Liberty Mutual	LGI-641-004051-046	1,000,000	1,000,000
1/77-1/78	Liberty Mutual	LGI-641-004051-047	1,000,000	1,000,000
1/78-1/79	Liberty Mutual	LGI-641-004051-048	1,000,000	1,000,000
1/79-1/80	Liberty Mutual	LGI-641-004051-049	1,000,000	1,000,000
1/80-1/81	Liberty Mutual	LGI-641-004051-040	1,000,000	1,000,000
1/81-1/82	Liberty Mutual	LGI-612-004157-041	1,000,000	1,000,000
1/82-1/83	Liberty Mutual	LGI-612-004157-042	1,000,000	1,000,000
1/83-1/84	Liberty Mutual	LGI-612-004157-043	1,000,000	1,000,000
1/84-1/85	Liberty Mutual	LGI-612-004157-044	1,000,000	1,000,000
1/85-1/86	Liberty Mutual	LGI-612-004157-045	1,000,000	1,000,000
1/86-1/87	Liberty Mutual	LGI-612-004157-046	2,000,000	2,000,000
8/86-8/87	Liberty Mutual	LGI-612-004207-046	1,000,000	1,000,000
7/87-7/89	National Union	RMGLA4300960	1,000,000	1,000,000
7/89-7/90	National Union	RMGLA4596920	1,000,000	1,000,000