

COPY

PLAINTIFF'S EXHIBIT

RS-145a

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RILEY STOKER CORPORATION

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

IN RE:) NO. 828684
)
COMPLEX ASBESTOS LITIGATION) DEFENDANT RILEY STOKER
) CORPORATION'S RESPONSES TO
) PLAINTIFFS' STANDARD GENERAL
) ORDER 129 INTERROGATORIES

Riley Stoker Corporation ("Riley Stoker" or the "Company"), pursuant to and under the protection of the California Rules of Civil Procedure, hereby files these responses to Plaintiffs' Standard Interrogatories (hereinafter "Interrogatories").

PRELIMINARY STATEMENT

These Interrogatories concern events which occurred years ago. The responses are believed to be accurate as of the date of filing, but Riley Stoker Corporation's investigation of the underlying facts is continuing. If further discovery of additional facts, adds meaning to the known facts, or establishes new factual conclusions or legal contentions, these responses will be supplemented if required by applicable law. Thus, the following

1 responses are made without prejudice to Riley Stoker Corporation's
2 right to produce evidence of any subsequently discovered fact or
3 facts Riley Stoker Corporation may later recall. Riley Stoker
4 Corporation accordingly reserves the right to amend or supplement
5 any and all responses herein, if permitted or required by ap-
6 plicable law, as additional facts are ascertained, or as the
7 contentions of the plaintiffs herein may be discovered or amended.

8 Plaintiffs' Interrogatories are addressed to a corporation
9 which has no independent knowledge of the information supplied in
10 these responses. Riley Stoker Corporation refers to and is limited
11 to the officers and directors of Riley Stoker Corporation located
12 in Worcester, Massachusetts, and those Riley Stoker Corporation
13 employees who the Company believes are responsible for and in
14 possession of corporate documents or information that is responsive
15 to plaintiffs' Interrogatories. The information supplied in these
16 responses is based on the knowledge of Riley Stoker Corporation's
17 employees and authorized agents as to which the affiant may not
18 have personal knowledge of the matter stated herein.

19 The responses contained herein are made in a good faith
20 effort to supply as much factual information and as much
21 specification of legal contentions as is presently known, but in no
22 way should prejudice Riley Stoker Corporation in relation to
23 further discovery, research or analysis.

24 Neither Riley Stoker Corporation nor any company it
25 controlled, purchased, or acquired any interest in has ever made,
26 mined, manufactured, distributed or processed, as Riley Stoker
27 Corporation understands these terms, any asbestos-containing
28 products, which Riley Stoker Corporation understands to mean

1 thermal insulation products that contain asbestos as an ingredient.
2 Certain boilers designed by Riley Stoker, however, had components
3 that contained asbestos.

4 Riley Stoker Corporation's product line of industrial and
5 utility fuel burning equipment is marketed and sold primarily to
6 large, sophisticated and knowledgeable commercial customers whose
7 architects, engineers, consultants or other agents frequently
8 specified the type, brand and quality of component parts to be
9 utilized in the installation of their boilers. Moreover, component
10 manufacturers supplied product selection and instructions for
11 proper and safe application, use and installation of their asbestos
12 products.

13 Riley Stoker Corporation incorporates by reference this
14 preliminary statement into the response to each interrogatory.

15 GENERAL OBJECTIONS

16 Riley Stoker Corporation objects to these Interrogatories on
17 the grounds that they are overly broad, unduly burdensome, beyond
18 the scope of product identification in this litigation and not
19 reasonably calculated to lead to the discovery of relevant or
20 admissible evidence. Riley Stoker Corporation also objects to the
21 form, as well as the ambiguous and compound nature of many of the
22 Interrogatories, in addition to the false predicate contained
23 therein.

24 Moreover, these Interrogatories call for information which is
25 necessarily outside of the scope of Riley Stoker's knowledge, and
26 therefore, any response is formulated on the basis of the best
27 information available to Riley Stoker.

28 Any response by Riley Stoker Corporation to these

1 Interrogatories does not in any way constitute a waiver as to any
2 information which is protected by the attorney-client and/or
3 attorney work product privileges, or any other proprietary rights
4 or material including, but not limited to, trade secrets.

5 Moreover, Riley Stoker Corporation objects to any
6 interrogatory which implies or assumes that any individual
7 plaintiff actually has an asbestos related disease or any injury
8 allegedly related to asbestos. Riley Stoker Corporation in no way
9 admits, by responding to these Interrogatories, that any plaintiff
10 has an asbestos related disease or injury. The burden of proof is
11 on each plaintiff to prove that he/she has an asbestos related
12 disease, and Riley Stoker has a constitutional right to deny same.

13 Moreover, Riley Stoker Corporation objects to any
14 interrogatory which is not reasonably calculated to lead to the
15 discovery of admissible evidence. All of these objections are
16 incorporated by reference and adopted as to each and every
17 interrogatory contained herein.

18 LIMITATIONS

19 1. Trial preparation and factual investigation are ongoing.
20 Accordingly, Riley Stoker Corporation's responses to these
21 Interrogatories are based solely on information known to it at the
22 time of the service of these answers. Riley Stoker Corporation
23 reserves the right, therefore, to make reference at trial, or in
24 any other hearings, in this action, to facts and documents not
25 identified in these answers, the existence or relevance of which is
26 subsequently discovered by Riley Stoker or its counsel.

27 2. Plaintiff's Interrogatories are addressed to persons who
28 have no independent personal knowledge of the information supplied

1 in these responses. The information supplied in these responses to
2 Interrogatories is based upon information as to which the affiant
3 may not have personal knowledge of the matter stated herein.

4 INTERROGATORY RESPONSES

5 RESPONSE NO. 1

6 Riley Stoker objects to this interrogatory on the grounds
7 that it is irrelevant to the subject matter of the pending
8 litigation, and not reasonably calculated to lead to the discovery
9 of admissible evidence. Riley Stoker further objects to this
10 interrogatory on the grounds that it requests information protected
11 by the attorney-client privilege and/or the attorney work-product
12 doctrine. Furthermore, Riley Stoker states that it compiled the
13 information in these responses from various sources. In doing so,
14 Riley Stoker has complied with its obligations under applicable
15 rules of court to conduct a reasonable investigation in order to
16 prepare its responses, and objects to identifying individuals as
17 neither relevant nor reasonably calculated to lead to the discovery
18 of admissible evidence. Without waiving its objections, Riley
19 Stoker states: James S. Brantl, General Counsel, DB Riley, Inc.,
20 P.O. Box 15040, Worcester, MA. 01615-0040.

21 RESPONSE NO. 2

22 See Answer to Interrogatory No. 1 which, together with
23 objections stated therein, is incorporated by reference.

24 RESPONSE NO. 3

25 Riley Stoker objects to this interrogatory on the grounds
26 that it is irrelevant to the subject matter of the pending
27 litigation and not reasonably calculated to lead to the discovery
28 of admissible evidence. Without waiving its objections, Riley

1 Stoker states that it is a corporation organized under the laws of
2 the Commonwealth of Massachusetts. See attached corporate history.
3 Riley Stoker further states that if this interrogatory is asking
4 whether Riley Stoker is licensed to do business in California,
5 Riley Stoker states that it is licensed to do business in
6 California.

7 RESPONSE NO. 4

8 See Answer to Interrogatory No. 3 which, together with
9 objections stated therein, is incorporated by reference. See also
10 attached corporate history.

11 RESPONSE NO. 5

12 See Answer to Interrogatory No. 4 which, together with
13 objections stated therein, is incorporated by reference.

14 RESPONSE NO. 6

15 See Answer to Interrogatory No. 3 which, together with
16 objections stated therein, is incorporated by reference.

17 RESPONSE NO. 7

18 See Answer to Interrogatory No. 3 which, together with
19 objections stated therein, is incorporated by reference.

20 RESPONSE NO. 8

21 See Answer to Interrogatory No. 3 which, together with
22 objections stated therein, is incorporated by reference.

23 RESPONSE NO. 9

24 Riley Stoker objects to this interrogatory on the grounds
25 that it is irrelevant to the subject matter of the pending
26 litigation and not reasonably calculated to lead to the discovery
27 of admissible evidence. Without waiving its objections, Riley
28 Stoker states that none of its employees is designated as the

1 "custodian of business records."

2 RESPONSE NO. 10

3 Riley Stoker objects to this interrogatory on the grounds
4 that it is vague, ambiguous, unduly burdensome, and not reasonably
5 calculated to lead to the discovery of admissible evidence.
6 Without waiving its objections, Riley Stoker states that it does
7 not concede that its boilers are or were "asbestos-containing
8 products." Riley Stoker Corporation nor any company it controlled,
9 purchased, or acquired any interest in has ever made, mined,
10 manufactured, distributed or processed, as Riley Stoker Corporation
11 understands these terms, raw asbestos or asbestos-containing
12 products, which Riley Stoker Corporation understands to mean
13 thermal insulation products that contain asbestos as an ingredient.

14 RESPONSE NO. 11

15 Riley Stoker objects to this interrogatory on the grounds
16 that it is vague, ambiguous, unduly burdensome, irrelevant to the
17 subject matter of the pending litigation, and not reasonably
18 calculated to lead to the discovery of admissible evidence. Without
19 waiving its objections, Riley Stoker states that it does not
20 concede that its boilers are or were "asbestos-containing
21 products." Riley Stoker Corporation nor any company it controlled,
22 purchased, or acquired any interest in has ever made, mined,
23 manufactured, distributed or processed, as Riley Stoker Corporation
24 understands these terms, raw asbestos or asbestos-containing
25 products, which Riley Stoker Corporation understands to mean
26 thermal insulation products that contain asbestos as an ingredient.
27 Riley Stoker further states that it has never employed a medical
28 director, industrial hygienist or physician.

1 RESPONSE NO. 12

2 Riley Stoker objects to this interrogatory on the grounds
3 that it is vague, ambiguous, irrelevant to the subject matter of
4 the pending litigation, and not reasonably calculated to lead to
5 the discovery of admissible evidence.

6 RESPONSE NO. 13

7 Riley Stoker objects to this interrogatory on the grounds
8 that it is vague, ambiguous, unduly burdensome, and not reasonably
9 calculated to lead to the discovery of admissible evidence.
10 Without waiving its objections, Riley Stoker states that it does
11 not concede that its boilers are or were "asbestos-containing
12 products." Riley Stoker Corporation nor any company it controlled,
13 purchased, or acquired any interest in has ever made, mined,
14 manufactured, distributed or processed, as Riley Stoker Corporation
15 understands these terms, raw asbestos or asbestos-containing
16 products, which Riley Stoker Corporation understands to mean
17 thermal insulation products that contain asbestos as an ingredient.
18 Riley Stoker further states that it was never a member and never
19 paid dues for a representative to be a member of the listed
20 organizations.

21 RESPONSE NO. 14

22 See Answer to Interrogatory No. 13 which, together with
23 objections stated therein, is incorporated by reference.

24 RESPONSE NO. 15

25 Riley Stoker objects to this interrogatory on the grounds
26 that it is vague, ambiguous, unduly burdensome, and not reasonably
27 calculated to lead to the discovery of admissible evidence.
28 Without waiving its objections, Riley Stoker states that prior to

1 1973 it had never received any documents containing results or
2 conclusions of any studies and/or tests conducted by Bonsib for
3 Standard Oil of New Jersey relating to asbestos exposure in the
4 workplace or the human health consequences of exposure to asbestos.

5 RESPONSE NO. 16

6 Riley Stoker objects to this interrogatory on the grounds
7 that it is vague, ambiguous, unduly burdensome, and not reasonably
8 calculated to lead to the discovery of admissible evidence.
9 Without waiving its objections, Riley Stoker states that prior to
10 1973 it had never received a copy of any portion of any studies
11 and/or tests conducted by any insurance company, including but not
12 limited to Metropolitan Life Insurance Company and Aetna Insurance
13 relating to asbestos exposure in the workplace or the human health
14 consequences of exposure to asbestos.

15 RESPONSE NO. 17

16 Riley Stoker objects to this interrogatory on the grounds
17 that it is vague, ambiguous, unduly burdensome, and not reasonably
18 calculated to lead to the discovery of admissible evidence.
19 Without waiving its objections, Riley Stoker states that prior to
20 1973 it had never received any documents containing results or
21 conclusions of any studies and/or tests conducted by any
22 laboratory, including but not limited to, the Saranac Laboratory
23 relating to asbestos exposure in the workplace or the human health
24 consequences of exposure to asbestos.

25 RESPONSE NO. 18

26 Riley Stoker objects to this interrogatory on the grounds
27 that it is vague, ambiguous, unduly burdensome, irrelevant to the
28 subject matter of the pending litigation, and not reasonably

1 calculated to lead to the discovery of admissible evidence. Without
2 waiving its objections, Riley Stoker states that prior to 1973 it
3 never maintained a library (or libraries) which contained books,
4 articles, periodicals, journals, and/or reference materials that
5 related to the subjects of asbestos, industrial hygiene, medicine,
6 safety and/or occupational disease.

7 RESPONSE NO. 19

8 Riley Stoker objects to this interrogatory on the grounds
9 that it is vague, ambiguous, unduly burdensome, and not reasonably
10 calculated to lead to the discovery of admissible evidence.
11 Without waiving its objections, Riley Stoker states that it has no
12 record indicating that prior to 1980 it exchanged documents or
13 communicated with any person or other company expressly regarding
14 the results of tests and/or studies relating to asbestos exposure
15 in the workplace or the human health consequences of exposure to
16 asbestos. Discovery is continuing. Riley Stoker therefore
17 reserves the right to supplement this answer.

18 RESPONSE NO. 20

19 Riley Stoker objects to this interrogatory on the grounds
20 that it is vague, ambiguous, unduly burdensome, and not reasonably
21 calculated to lead to the discovery of admissible evidence.
22 Without waiving its objections, Riley Stoker states that no
23 employee or designee of Riley Stoker has testified as a
24 representative of Riley Stoker before the Occupational Safety and
25 Health Administration, the National Institute of Occupational
26 Safety and Health, or any committee or subcommittee of the United
27 States Congress relating to asbestos exposure in the workplace or
28 the human health consequences of exposure to asbestos.

1 RESPONSE NO. 21

2 Riley Stoker objects to this interrogatory on the grounds
3 that it is vague, ambiguous, unduly burdensome, and not reasonably
4 calculated to lead to the discovery of admissible evidence.
5 Without waiving its objections, Riley Stoker states that it does
6 not concede that its boilers are or were "asbestos-containing
7 products." Riley Stoker Corporation nor any company it controlled,
8 purchased, or acquired any interest in has ever made, mined,
9 manufactured, distributed or processed, as Riley Stoker Corporation
10 understands these terms, raw asbestos or asbestos-containing
11 products, which Riley Stoker Corporation understands to mean
12 thermal insulation products that contain asbestos as an ingredient.
13 Furthermore, this interrogatory appears to be directed to
14 manufacturers of asbestos-containing products. As Riley Stoker did
15 not manufacture asbestos-containing products, this interrogatory is
16 inapplicable as to Riley Stoker.

17 RESPONSE NO. 22

18 Riley Stoker objects to this interrogatory on the grounds
19 that it is vague, ambiguous, unduly burdensome, and not reasonably
20 calculated to lead to the discovery of admissible evidence.
21 Without waiving its objections, Riley Stoker states that it does
22 not concede that its boilers are or were "asbestos-containing
23 products." Riley Stoker Corporation nor any company it controlled,
24 purchased, or acquired any interest in has ever made, mined,
25 manufactured, distributed or processed, as Riley Stoker Corporation
26 understands these terms, raw asbestos or asbestos-containing
27 products, which Riley Stoker Corporation understands to mean
28 thermal insulation products that contain asbestos as an ingredient.

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

5 RESPONSE NO. 23

6 Riley Stoker objects to this interrogatory on the grounds
7 that it is vague, ambiguous, unduly burdensome, and not reasonably
8 calculated to lead to the discovery of admissible evidence. Without
9 waiving its objections, Riley Stoker states that it does not
10 concede that its boilers are or were "asbestos-containing
11 products." Riley Stoker Corporation nor any company it controlled,
12 purchased, or acquired any interest in has ever made, mined,
13 manufactured, distributed or processed, as Riley Stoker Corporation
14 understands these terms, raw asbestos or asbestos-containing
15 products, which Riley Stoker Corporation understands to mean
16 thermal insulation products that contain asbestos as an ingredient.
17 Furthermore, this interrogatory appears to be directed to
18 manufacturers of asbestos-containing products. As Riley Stoker did
19 not manufacture asbestos-containing products, this interrogatory is
20 inapplicable as to Riley Stoker.

21 RESPONSE NO. 24

22 Riley Stoker objects to this interrogatory on the grounds
23 that it is vague, ambiguous, unduly burdensome, irrelevant to the
24 subject matter of the pending litigation, and not reasonably
25 calculated to lead to the discovery of admissible evidence. Without
26 waiving its objections, Riley Stoker states that it does not
27 concede that its boilers are or were "asbestos-containing
28 products." Riley Stoker Corporation nor any company it controlled,

1 purchased, or acquired any interest in has ever made, mined,
2 manufactured, distributed or processed, as Riley Stoker Corporation
3 understands these terms, raw asbestos or asbestos-containing
4 products, which Riley Stoker Corporation understands to mean
5 thermal insulation products that contain asbestos as an ingredient.
6 Furthermore, this interrogatory appears to be directed to
7 manufacturers of asbestos-containing products. As Riley Stoker did
8 not manufacture asbestos-containing products, this interrogatory is
9 inapplicable as to Riley Stoker. Riley Stoker further states: no.

10 RESPONSE NO. 25

11 Riley Stoker objects to this interrogatory on the grounds
12 that it is vague, ambiguous, unduly burdensome, irrelevant to the
13 subject matter of the pending litigation, and not reasonably
14 calculated to lead to the discovery of admissible evidence. Without
15 waiving its objections, Riley Stoker states that it does not
16 concede that its boilers are or were "asbestos-containing
17 products." Riley Stoker Corporation nor any company it controlled,
18 purchased, or acquired any interest in has ever made, mined,
19 manufactured, distributed or processed, as Riley Stoker Corporation
20 understands these terms, raw asbestos or asbestos-containing
21 products, which Riley Stoker Corporation understands to mean
22 thermal insulation products that contain asbestos as an ingredient.
23 Riley Stoker further states that it was named in two workers'
24 compensation proceedings in which the claimants sought compensation
25 for alleged asbestos-related injuries. Ernest R. Moreno v. Marine
26 Engineering & Supply Co., et. al., claim number L.A. 76-144, was
27 brought in the Industrial Accident Commission of the State of
28 California in 1947. The suit was dismissed as to Riley Stoker. In

1 or around August 1956, Riley Stoker appears to have received a
2 Notice of Hearing from the Workers' Compensation Department of the
3 State of Michigan in connection with Lewis Munger v. Armstrong Cork
4 Co., Travelers Insurance Co. So far as Riley Stoker is able to
5 determine, neither claim included any "report or communication"
6 regarding the alleged hazards of asbestos apart from the making of
7 the claim itself. Discovery is continuing. Riley Stoker therefore
8 reserves the right to amend or supplement this response.

9 RESPONSE NO. 26

10 Riley Stoker objects to this interrogatory on the grounds
11 that it is vague, ambiguous, unduly burdensome, irrelevant to the
12 subject matter of the pending litigation, and not reasonably
13 calculated to lead to the discovery of admissible evidence.
14 Without waiving its objections, Riley Stoker states that it
15 anticipates it has sufficient insurance coverage with which to
16 satisfy reasonable judgments in these cases.

17 RESPONSE NO. 27

18 Riley Stoker objects to this interrogatory on the grounds
19 that it is vague, ambiguous, unduly burdensome, and not reasonably
20 calculated to lead to the discovery of admissible evidence. Without
21 waiving its objections, Riley Stoker states that it does not
22 concede that its boilers are or were "asbestos-containing
23 products." Riley Stoker Corporation nor any company it controlled,
24 purchased, or acquired any interest in has ever made, mined,
25 manufactured, distributed or processed, as Riley Stoker Corporation
26 understands these terms, raw asbestos or asbestos-containing
27 products, which Riley Stoker Corporation understands to mean
28 thermal insulation products that contain asbestos as an ingredient.

1 RESPONSE NO. 28

2 Riley Stoker objects to this interrogatory on the grounds
3 that it is vague, ambiguous, unduly burdensome, and not reasonably
4 calculated to lead to the discovery of admissible evidence.
5 Without waiving its objections, Riley Stoker states that it has
6 never mined, milled, supplied, imported, processed, distributed,
7 marketed, sold or brokered raw asbestos.

8 RESPONSE NO. 29

9 See Answer to Interrogatory No. 28 which, together with
10 objections stated therein, is incorporated by reference.

11 RESPONSE NO. 30

12 Riley Stoker objects to this interrogatory on the grounds
13 that it is vague, ambiguous, unduly burdensome, and not reasonably
14 calculated to lead to the discovery of admissible evidence. Without
15 waiving its objections, Riley Stoker states that it does not
16 concede that its boilers are or were "asbestos-containing
17 products." Riley Stoker Corporation nor any company it controlled,
18 purchased, or acquired any interest in has ever made, mined,
19 manufactured, distributed, processed, imported, marketed, labeled
20 or brokered as Riley Stoker Corporation understands these terms,
21 asbestos-containing products, which Riley Stoker Corporation
22 understands to mean thermal insulation products that contain
23 asbestos as an ingredient.

24 RESPONSE NO. 31

25 See Answer to Interrogatory No. 30 which, together with
26 objections stated therein, is incorporated by reference.

27 RESPONSE NO. 32

28 Not applicable.

1 RESPONSE NO. 33

2 Not applicable.

3 RESPONSE NO. 34

4 See Answers to Interrogatory Nos. 29 and 31 which, together
5 with objections stated therein, are incorporated by reference.

6 RESPONSE NO. 35

7 Riley Stoker objects to this interrogatory on the grounds
8 that it is vague, ambiguous, unduly burdensome, and not reasonably
9 calculated to lead to the discovery of admissible evidence.
10 Without waiving its objections, Riley Stoker states that it did not
11 enter into any agreements for the rebranding of products.

12 RESPONSE NO. 36

13 See Answer to Interrogatory No. 35 which, together with
14 objections stated therein, is incorporated by reference.

15 RESPONSE NO. 37

16 See Answers to Interrogatory Nos. 29 & 31 which, together
17 with objections stated therein, are incorporated by reference.

18 RESPONSE NO. 38

19 Riley Stoker objects to this interrogatory on the grounds
20 that it is vague, ambiguous, unduly burdensome, and not reasonably
21 calculated to lead to the discovery of admissible evidence. Without
22 waiving its objections, Riley Stoker states that it does not
23 concede that its boilers are or were "asbestos-containing
24 products." Riley Stoker Corporation nor any company it controlled,
25 purchased, or acquired any interest in has ever made, mined,
26 manufactured, distributed or processed, as Riley Stoker Corporation
27 understands these terms, raw asbestos or asbestos-containing
28 products, which Riley Stoker Corporation understands to mean

1 thermal insulation products that contain asbestos as an ingredient.
2 Furthermore, this interrogatory appears to be directed to
3 manufacturers of asbestos-containing products. As Riley Stoker did
4 not manufacture asbestos-containing products, this interrogatory is
5 inapplicable as to Riley Stoker. Riley Stoker further states that
6 an identifying name plate was attached to each Riley Stoker boiler.

7 RESPONSE NO. 39

8 Riley Stoker objects to this interrogatory on the grounds
9 that it is vague, ambiguous, unduly burdensome, and not reasonably
10 calculated to lead to the discovery of admissible evidence. Without
11 waiving its objections, Riley Stoker states that it does not
12 concede that its boilers are or were "asbestos-containing
13 products." Riley Stoker Corporation nor any company it controlled,
14 purchased, or acquired any interest in has ever made, mined,
15 manufactured, distributed or processed, as Riley Stoker Corporation
16 understands these terms, asbestos-containing products, which Riley
17 Stoker Corporation understands to mean thermal insulation products
18 that contain asbestos as an ingredient.

19 RESPONSE NO. 40

20 Riley Stoker objects to this interrogatory on the grounds
21 that it is vague, ambiguous, unduly burdensome, and not reasonably
22 calculated to lead to the discovery of admissible evidence. Without
23 waiving its objections, Riley Stoker states that it does not
24 concede that its boilers are or were "asbestos-containing
25 products." Riley Stoker Corporation nor any company it controlled,
26 purchased, or acquired any interest in has ever made, mined,
27 manufactured, distributed or processed, as Riley Stoker Corporation
28 understands these terms, asbestos-containing products, which Riley

1 Stoker Corporation understands to mean thermal insulation products
2 that contain asbestos as an ingredient.

3 RESPONSE NO. 41

4 Riley Stoker objects to this interrogatory on the grounds
5 that it is vague, ambiguous, unduly burdensome, and not reasonably
6 calculated to lead to the discovery of admissible evidence.
7 Without waiving its objections, Riley Stoker states that it does
8 not concede that its boilers are or were "asbestos-containing
9 products." Riley Stoker Corporation nor any company it controlled,
10 purchased, or acquired any interest in has ever made, mined,
11 manufactured, distributed or processed, as Riley Stoker Corporation
12 understands these terms, raw asbestos or asbestos-containing
13 products, which Riley Stoker Corporation understands to mean
14 thermal insulation products that contain asbestos as an ingredient.

15 RESPONSE NO. 42

16 Riley Stoker objects to this interrogatory on the grounds
17 that it is vague, ambiguous, unduly burdensome, and not reasonably
18 calculated to lead to the discovery of admissible evidence.
19 Without waiving its objections, Riley Stoker states that it did not
20 have a contract unit.

21 RESPONSE NO. 43

22 See Answer to Interrogatory No. 42 which, together with
23 objections stated therein, is incorporated by reference.

24 RESPONSE NO. 44

25 Riley Stoker objects to this interrogatory on the grounds
26 that it is vague, ambiguous, unduly burdensome, and not reasonably
27 calculated to lead to the discovery of admissible evidence.
28 Without waiving its objections, Riley Stoker states that sometime

1 after 1972, Riley Stoker became aware that some diseases were
2 alleged to be associated with exposure to asbestos. Riley Stoker
3 does not know precisely how or when it became aware of such
4 allegation.

5 RESPONSE NO. 45

6 Riley Stoker objects to this interrogatory on the grounds
7 that it is vague, ambiguous, unduly burdensome, irrelevant to the
8 subject matter of the pending litigation, and not reasonably
9 calculated to lead to the discovery of admissible evidence.
10 Without waiving its objections, Riley Stoker states that sometime
11 after 1972, Riley Stoker became aware that some diseases were
12 alleged to be associated with exposure to asbestos. Riley Stoker
13 does not know precisely how or when it became aware of such
14 allegation.

15 RESPONSE NO. 46

16 See Answers to Interrogatory Nos. 45 & 46 which, together
17 with objections stated therein, are incorporated by reference.

18 RESPONSE NO. 47

19 Riley Stoker objects to this interrogatory on the grounds
20 that it is irrelevant to the subject matter of the pending
21 litigation and not reasonably calculated to lead to the discovery
22 of admissible evidence. Without waiving its objections, Riley
23 Stoker states that it does not concede that its boilers are or were
24 "asbestos-containing products." Riley Stoker Corporation nor any
25 company it controlled, purchased, or acquired any interest in has
26 ever made, mined, manufactured, distributed or processed, as Riley
27 Stoker Corporation understands these terms, raw asbestos or
28 asbestos-containing products, which Riley Stoker Corporation

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

6 RESPONSE NO. 48

7 Riley Stoker objects to this interrogatory on the grounds
8 that it is irrelevant to the subject matter of the pending
9 litigation and not reasonably calculated to lead to the discovery
10 of admissible evidence. Without waiving its objections, Riley
11 Stoker states that it does not concede that its boilers are or were
12 "asbestos-containing products." Riley Stoker Corporation nor any
13 company it controlled, purchased, or acquired any interest in has
14 ever made, mined, manufactured, distributed or processed, as Riley
15 Stoker Corporation understands these terms, raw asbestos or
16 asbestos-containing products, which Riley Stoker Corporation
17 understands to mean thermal insulation products that contain
18 asbestos as an ingredient. Furthermore, this interrogatory appears
19 to be directed to manufacturers of asbestos-containing products.
20 As Riley Stoker did not manufacture asbestos-containing products,
21 this interrogatory is inapplicable as to Riley Stoker.

22 RESPONSE NO. 49

23 Riley Stoker objects to this interrogatory on the grounds
24 that it is vague, ambiguous, unduly burdensome, and not reasonably
25 calculated to lead to the discovery of admissible evidence.
26 Without waiving its objections, Riley Stoker states that it does
27 not concede that its boilers are or were "asbestos-containing
28 products." Riley Stoker Corporation nor any company it controlled,

1 purchased, or acquired any interest in has ever made, mined,
2 manufactured, distributed or processed, as Riley Stoker Corporation
3 understands these terms, raw asbestos or asbestos-containing
4 products, which Riley Stoker Corporation understands to mean
5 thermal insulation products that contain asbestos as an ingredient.
6 Furthermore, this interrogatory appears to be directed to
7 manufacturers of asbestos-containing products. As Riley Stoker did
8 not manufacture asbestos-containing products, this interrogatory is
9 inapplicable as to Riley Stoker.

10 RESPONSE NO. 50

11 Riley Stoker objects to this interrogatory on the grounds
12 that it is vague, ambiguous, unduly burdensome, and not reasonably
13 calculated to lead to the discovery of admissible evidence.
14 Without waiving its objections, Riley Stoker states that it does
15 not concede that its boilers are or were "asbestos-containing
16 products." Riley Stoker Corporation nor any company it controlled,
17 purchased, or acquired any interest in has ever made, mined,
18 manufactured, distributed or processed, as Riley Stoker Corporation
19 understands these terms, raw asbestos or asbestos-containing
20 products, which Riley Stoker Corporation understands to mean
21 thermal insulation products that contain asbestos as an ingredient.
22 Furthermore, this interrogatory appears to be directed to
23 manufacturers of asbestos-containing products. As Riley Stoker did
24 not manufacture asbestos-containing products, this interrogatory is
25 inapplicable as to Riley Stoker.

26 /////

27 /////

28 /////

1 RESPONSE NO. 51

2 Riley Stoker objects to this interrogatory on the grounds
3 that it is vague, ambiguous, unduly burdensome, irrelevant to the
4 subject matter of the pending litigation, and not reasonably
5 calculated to lead to the discovery of admissible evidence.
6 Without waiving its objections, Riley Stoker states that it never
7 owned or operated a railroad.

8 RESPONSE NO. 52

9 Riley Stoker objects to this interrogatory on the grounds
10 that it is vague, ambiguous, unduly burdensome, irrelevant to the
11 subject matter of the pending litigation, and not reasonably
12 calculated to lead to the discovery of admissible evidence.
13 Without waiving its objections, Riley Stoker states that it never
14 owned or operated a shipyard.

15 RESPONSE NO. 53

16 Riley Stoker objects to this interrogatory on the grounds
17 that it is vague, ambiguous, unduly burdensome, and not reasonably
18 calculated to lead to the discovery of admissible evidence. Without
19 waiving its objections, Riley Stoker states that it does not
20 concede that its boilers are or were "asbestos-containing
21 products." Riley Stoker Corporation nor any company it controlled,
22 purchased, or acquired any interest in has ever made, mined,
23 manufactured, distributed or processed, as Riley Stoker Corporation
24 understands these terms, raw asbestos or asbestos-containing
25 products, which Riley Stoker Corporation understands to mean
26 thermal insulation products that contain asbestos as an ingredient.
27 Furthermore, this interrogatory appears to be directed to
28 manufacturers of asbestos-containing products. As Riley Stoker did

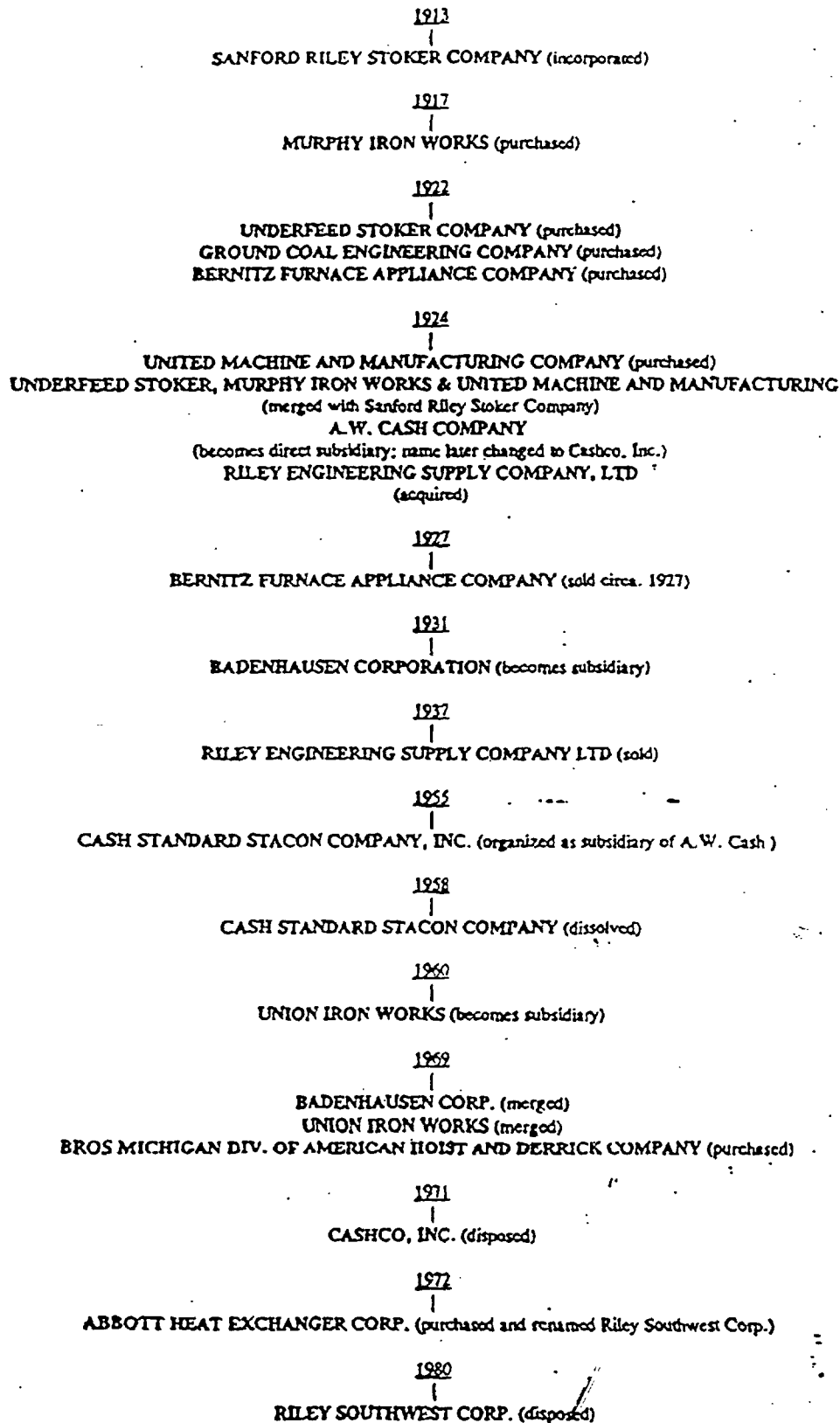
1 not manufacture asbestos-containing products, this interrogatory is
2 inapplicable as to Riley Stoker.

3 DATED: June 20, 1997

4 McNAMARA, HOUSTON, DODGE, McCLURE & NEY

5
6 By Joseph F. Fabel for
7 Thomas E. Pfalzer
8 Attorneys for Defendant RILEY STOKER
9 CORPORATION
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RILEY STOKER CORPORATE HISTORY



COMMONWEALTH OF MASSACHUSETTS) SS
COUNTY OF WORCESTER)


James S. Brantl

May, 1997.

Tammy M. McCune
Notary Public
My commission expires: July 3, 2003

McNAMARA, HOUSTON, DODGE, McCLURE & NEY

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DANIEL J. McNAMARA, RETIRED

June 27, 1997

Jack K. Clapper, Esq.
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Sausalito, CA 94965

Re: In Re Complex Asbestos Litigation
Ct. & Action No.: SFSC #828684
Our Client: Riley Stoker Corporation

Dear Mr. Clapper:

Per your request, enclosed please find **DEFENDANT RILEY STOKER CORPORATION'S RESPONSES TO PLAINTIFFS' GENERAL ORDER 129 INTERROGATORIES.**

Very truly yours,

McNAMARA, HOUSTON, DODGE, McCLURE & NEY

Rowena Walker
Rowena Walker

Enclosure

JUL - 1 1997

C