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 ATTORNEYS FOR MANVILLE CORPORATION ASBESTOS
 DISEASE COMPENSATION FUND

THOMAS GUNN and JULIA GUNN,)
 his wife; WILLIAM DEUTSCH and)
 MARIE DEUTSCH, his wife;)
 DANIEL INFANTI and CARMELLA)
 INFANTI, his wife; ANNETTE)
 JASKOWIAK, as Executrix of the)
 Estate of ARTHUR JASKOWIAK;)
 FRANK JUREWICZ; JAMES KING;)
 ROBERT LEARY and SHIRLEY)
 LEARY, his wife; ALLEN LEWIS)
 and JANET LEWIS, his wife;)
 ANTHONY MIGLIACCIO and)
 GERALDINE)
 MIGLIACCIO, his wife; PASQUAL)
 NAPPI; ANDREW STASIENKO and)
 GRACE STASIENKO, his wife;)
 ANDREW STASIK and IRMA STASIK,)
 his wife; RAYMOND STAVISH and)
 DELORES STAVISH, his wife;)
 JOHN THAYLER and FRANCES)
 THAYLER, his wife; BILLY WARD)
 and JANE WARD, his wife;)
 DOROTHY FROST, and ANDREW)
 FROST, her husband,)

Plaintiffs,)

v.)

THE CELOTEX CORPORATION,)
 successor-in-interest to the)
 PHILIP CAREY MANUFACTURING)
 COMPANY, PHILIP CAREY)
 CORPORATION, SMITH AND)
 KANZLER, BRIGGS MANUFACTURING,)
 AND PANACON CORPORATION;)
 A.C.&S., INC., a/k/a A CANDS,)
 INC., formerly known as)
 ARMSTRONG CONTRACTING AND)
 SUPPLY CORPORATION; ARMSTRONG)
 WORLD INDUSTRIES, INC.,)
 formerly known as ARMSTRONG)

UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY
 CIVIL ACTION NUMBER 86-5090

ASBESTOS LITIGATION

THIRD-PARTY COMPLAINT AGAINST
 THE MANVILLE PERSONAL INJURY
 TRUST

CORK COMPANY; BIRD & SONS,)
INC.; CAREY-CANADIAN MINES,)
LTD.; EAGLE-PICHER INDUSTRIES,)
INC.; NATIONAL LEAD)
INDUSTRIES; FIBREBOARD)
CORPORATION; JOHN DOE (1);)
JOHN DOE (2); JOHN DOE (3);)
JOHN DOE (4); JOHN DOE (4);)
JOHN DOE (5); JOHN DOE (6);)
JOHN DOE (7); KEENE CORPORA-)
TION, Individually and as)
successor-in-interest to)
KEENE BUILDING PRODUCTS and)
BALDWIN, EHRET, & HILL; CROWN)
CORK AND SEAL CORPORATION,)
successor-in-interest to)
MUNDET CORK CORPORATION;)
NICOLET, INC., Individually)
and as successor-in interest)
to KEASBEY & MATTISON COMPANY;)
OWENS-CORNING FIBREGLAS CORP-)
ORATION; OWENS-ILLINOIS, INC.;)
PITTSBURGH CORNING CORPORA-)
TION; RAYMARK INDUSTRIES, INC.)
Individually and formerly)
known as RAYBESTOS-MANHATTAN,)
INC.; SOUTHERN TEXTILE CORPOR-)
ATION, formerly known as)
SOUTHERN ASBESTOS, a wholly)
owned subsidiary of H. K.)
PORTER CO., INC.; GARLOCK,)
INC.; PORTER-HAYDEN COMPANY;)
JOHN CRANE-HOUDAILE, INC.,)

Defendants.)

and)

ARMSTRONG WORLD INDUSTRIES,)
INC.; ACandS, INC.; THE)
CELOTEX CORPORATION;)
FIBREBOARD CORPORATION; KEENE)
CORPORATION; OWENS-ILLINOIS,)
INC.; PITTSBURGH CORNING,)
INC.; and PORTER-HAYDEN COMPA-)
NY;)

Defendants-Third-)
Party Plaintiffs,)

v.
MANVILLE PERSONAL INJURY
TRUST.

Third-Party
Defendant

DEFENDANT MANVILLE CORPORATION ASBESTOS
DISEASE COMPENSATION FUND'S
ANSWERS TO INTERROGATORIES

Defendant Manville Corporation Asbestos Disease Compensation Fund (hereafter "the Fund"), by and through its attorneys, MCALLISTER, WESTMORELAND, VESPER & SCHWARTZ, P.A. hereby submits the following answers to Form B Interrogatories to Defendants.

PRELIMINARY MATTERS

The Fund objects to these Interrogatories to the extent that they ask for information relating to the Defendant's involvement in the asbestos industry. The Fund has never been involved in the manufacture, sale or distribution of asbestos or asbestos containing products. Nevertheless, the Fund interprets these questions to relate to Manville Corporation, its predecessors or subsidiaries (hereafter "related entities").

The Fund objects to these Interrogatories to the extent that they call for production of documents entitled to protection as privileged attorney client communications or attorney work product.

The Fund reserves the right to supplement these responses to the extent that new or different information becomes available to it.

ANSWERS TO PART A

A.1. Where is defendant's corporate headquarters located?

ANSWER: Not applicable.

A.2. Set forth the state in which defendant is incorporated in and the date of incorporation there.

ANSWER: Not applicable.

A.3. Has defendant ever been incorporated under the laws of the State of New Jersey? If so, set forth the inclusive date the defendant was incorporated here.

ANSWER: Not applicable.

A.4. Has defendant ever maintained an office in the State of New Jersey? If so, indicate where this office was located and set forth the inclusive dates of its operation here and describe what function it served. In addition, set forth names, addresses and job positions of the individuals who staffed the office.

a. describe the type of business defendant did in New Jersey.

ANSWER: Not applicable.

A.5. Does defendant have an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.

ANSWER: Not applicable.

A.6. Has defendant ever had an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.

ANSWER: Not applicable.

A.7. State the name and address of defendant's corporate officers and indicate the respective offices they hold.

ANSWER: Not applicable.

A.8. Has defendant ever done business in the State of New Jersey?

ANSWER: Not applicable.

A.9. If the answer to the previous interrogatory is in the affirmative, state:

a. the inclusive dates the defendant did do business in the State of New Jersey;

b. where in New Jersey it did business.

ANSWER: Not applicable.

A.10. Set forth the following information about each entity supplied in your answer to Interrogatory B.4.:

a. the State or County of each entity's incorporation;

b. the corporate business headquarters of each entity from the date it was established until the present.

ANSWER: Not applicable.

ANSWERS TO PART B

B.1. State the name, address and job position of each and every individual signing these interrogatories on behalf of the defendant.

a. state the name, address and employer and job position of each person, whether defendant's employees or otherwise, who were consulted with or who assisted in the answering of these interrogatories.

ANSWER: These answers to Interrogatories are signed by a representative of the Manville Personal Injury Settlement Trust, 1825 Eye Street, N. W., Washington, D.C. 20006-1202, who does not have personal knowledge of the facts contained in these responses. Rather, the answers have been prepared by attorneys representing the Fund using documents available to them.

B.2. Give a full and detailed description of the nature of the business that your company is engaged in.

ANSWER: The Manville Corporation Asbestos Disease Compensation Fund is the name under which the Manville Personal Injury Settlement Trust (hereafter "the Trust") can be sued in asbestos related litigation. The Trust was created pursuant to the

Manville Corporation Second Amended and Restated Plan of Reorganization, United States Bankruptcy Court, Southern District of New York, November 28, 1988 (hereafter "the Plan"). A full description of the Trust's responsibilities is contained therein. A copy of the Plan will be produced at the records repository maintained by the Trust in Denver, Colorado, at a time convenient to the parties.

Under the Plan, the Trust is to assume liability for all asbestos related personal injury claims against Manville Corporation, its predecessors and subsidiaries (hereafter "related entities"). The purpose of the Trust is to provide fair and equitable compensation to individuals who have been injured as a result of exposure to asbestos or asbestos containing products sold by Manville Corporation or related entities.

B.3. When did your company commence its business?

ANSWER: The Fund officially assumed the liability for all asbestos health claims against Manville Corporation and related entities on November 28, 1988. See also answer to Interrogatory No. B.4.

B.4.a. Are or have any of defendant's predecessors, affiliates, subsidiaries, or parent corporations engaged in the mining, sale and distribution of asbestos and/or asbestos fiber and/or asbestos containing insulation products? If so, state the name of each such entity, describe the nature of the involvement that each entity has or has had in the mining, distribution or sale of these products and materials, and set forth the inclusive dates each was involved in each aspect of this business.

b. as to each such entity referred to in (a) above, state:

1. the relationship between defendant and each such entity;

2. the date each such relationship began and terminated;

3. the names and addresses of each such entity's corporate officers and Board of Directors;

4. the names and addresses of your corporate officers and Board of Directors.

ANSWER: Yes. Manville Corporation or related entities engaged in the manufacture and sale of asbestos containing products, as well as the mining, milling and sale of asbestos fiber. The H.W. Johns Company, a predecessor to Manville Corporation, first commenced business in 1858. Manville

Corporation or related entities first began to mine, mill and sell asbestos fiber with the purchase of the Jeffrey Mine in Asbestos, Quebec, in 1916.

Johns-Manville Corporation was incorporated in 1926. Johns-Manville Products Corporation, organized in 1927, was responsible for the manufacture of asbestos containing products. Johns-Manville Sales Corporation, organized in 1929, was responsible for the sale of asbestos containing products. In 1975, Johns-Manville Products Corporation merged into Johns-Manville Sales Corporation.

Manville Corporation and related entities discontinued the manufacture and sale of most asbestos containing thermal insulation products in 1972 or 1973. Manville Corporation or related entities discontinued the mining, milling and sale of asbestos fiber on September 9, 1983. Manville Corporation or related entities discontinued the manufacture and sale of all asbestos containing products by 1985.

The companies listed below as current or previous subsidiaries of Manville or related entities may have been engaged in the mining, sale or distribution of asbestos or asbestos-containing products.

CURRENT MANVILLE SUBSIDIARIES

(once asbestos-related companies)

Cobra Canada, Inc. (50% owned by American Standard)

Name changed from Cobra Friction Products, Limited - 1981

Johns-Manville Corporation

Incorporated - 1926

Johns-Manville East Africa, Limited

Incorporated - 1968

Johns-Manville India, Limited

Incorporated - 1965

Manville (Great Britain) Limited

Name changed from Johns-Manville (Great Britain) Limited
- 1982

Manville De France S.A.

Name changed from Johns-Manville De France S.A. - 1982

Manville Do Brazil Ltda.

Name changed from Johns-Manville Do Brazil - 1982

Manville Italian S.p.A.

Name changed from Johns-Manville Italiana S.P.A. - 1982

Manville Japan, Limited

Name changed from Johns-Manville Japan, Limited - 1931

Manville Mexicana S.A. de C.V.

Name changed from Johns-Manville Mexicana, S.A. de C.V. - 1982

Manville Sales Corporation

Name changed from Johns-Manville Sales Corporation - 1985

Manville Sudamericana Ltda

Name changed from Johns-Manville Sudamericana, Limited - 1982

New Materials, Inc.

Incorporated - 1958

Railroad Friction Products (50% owned by American Standard)

Incorporated - 1954

Termoacusticos, S.A. de C.V.

Incorporated - 1973

PREVIOUS MANVILLE SUBSIDIARIES

Acoustical Construction Corporation

Incorporated - 1930 in New York

Dissolved - 1946

American Mineral Company

Name changed from Seehaver Clay & Mineral Company - 1947

Merged into Desert Minerals, Inc. - 1975

Asbestos Construction Company, Inc.

Incorporated - 1922

Name changed to Johns-Manville Insulation Contracting & Supply
Company - 1960

Asbestos and Danville Railway Company

Incorporated - 1897

Divestment - 1982

Banner Rock Corporation

Incorporated - 1929

Dissolved - 1938

Beton et Mollith S.A.

Incorporated - 1923

Name changed to Johns-Manville S.A

Canadian Johns-Manville Asbestos, Limited
Incorporated - 1954
Name changed to Johns-Manville Amiante Canada, Inc. - 1980

Canadian Johns-Manville Ontario, Limited
Incorporate - 1950
Dissolved - 1968

Celite Corporation
Name changed from Fibre Corporation - 1928
Dissolved - 1939

Chem Blend System Corporation
Incorporated - 1965
1970 - Acquisition
Dissolved - 1972

Coalinga Asbestos Company, Inc.
Incorporated - 1960
Merged into Johns-Manville Sales Corporation - 1975

Cobra Friction Products, Limited (50% Held by J-M - 1981)
Incorporated - 1960
Name changed to Cobra Canada, Inc.

Crown Tuft Carpet, Inc.
Incorporated - 1963
Merged into Johns-Manville Products Corporation - 1972
Divestment to Celotex Corporation - 1972

Delaware Johns-Manville Corporation
Incorporated - 1927
Name changed to Johns-Manville Corporation of Delaware - 1927

Desert Minerals, Inc.
Incorporated - 1956
Merged into L. Grantham Corporation - 1975

Fibre Corporation
Incorporated - 1914
Name changed to Celite Corporation - 1928

Grantham Mines Corporation
Incorporated - 1969
Name changed to L. Grantham Corporation - 1969

Holophane Company, Limited (The)
Incorporated - 1911
Amalgamated with Canadian Johns-Manville Company, Limited
- 1978

Holophane S.A. de C.V.
Incorporated - 1962
Divestment - 1988

Interstate Flooring and Construction Company, Inc.
Incorporated - 1930
Dissolved - unknown

Jayem Exploration Company, Limited
Incorporated - 1961
Dissolved - 1980

John Brand Corporation
Name changed from Johns-Manville Dutch Brand Products - 1970
Dissolved - 1972

Johns-Manville (Great Britain) Limited
Name changed from Johns-Manville Company, Limited - 1966
Name changed to Manville (Great Britain) (Limited) - 1982

Johns-Manville (United Kingdom), Limited
Incorporated - 1959
Merged into Johns-Manville Company, Limited - 1965

H. W. Johns Manufacturing Company
Incorporated - 1858
Reorganized as H. W. Johns Manufacturing Company - 1874
Merged with Manville Covering to become H. W. Johns-Manville
Company - 1901

H. W. Johns-Manville Company
Merged with Manville Covering H. W. Johns Manufacturing
Company - 1901
Name changed to Johns-Manville, Inc. - 1920

Johns-Manville Amiante Canada, Inc.
Name changed from Canadian Johns-Manville Asbestos, Limited
- 1980
Sold - 1983

Johns-Manville Belgium, S.A.
Incorporated - 1961
Divestment - 1983

Johns-Manville Boley, Limited
Incorporated - 1931
Name changed to Johns-Manville Sudamericana, Limited - 1955

Johns-Manville Canada, Inc.
Incorporated - 1978
Sold - 1983

Johns-Manville Ceiling Corporation
 Incorporated - 1973
 Name changed to Southern Johns-Manville Products Corporation
 (Delaware) - 1973

Johns-Manville Company, Limited (United Kingdom)
 Incorporated - 1939
 Name changed to Johns-Manville (Great Britain), Limited - 1966

Johns-Manville Construction
 Incorporated - 1956
 Name changed to Johns-Manville Service Corporation - 1960

Johns-Manville Corporation of Delaware
 Name changed from Delaware Johns-Manville Corporation - 1927
 Name changed to Johns-Manville Products Corporation - 1932

Johns-Manville De France S.A.
 Name changed from Societe Anciens Etablissements Hordot and
 Chataignon, Flechet et Cie., Succs. - 1961
 Name changed to Manville de France S.A. - 1982

Johns-Manville De Ventas S.A. de C.V.
 Incorporated - 1962
 Name changed to Johns-Manville Mexicana, S.A. de C.V. - 1962

Johns-Manville Development Corporation
 Name changed to Johns-Manville Service Corporation - 1973
 Merged into Johns-Manville Sales Corporation - 1975

Johns-Manville Do Brazil Isolantes Termicos, Limited
 Name changed from Johns-Manville do Brazil S/A Isolantes
 Termicos - 1977
 Name changed to Manville Do Brazil, Limited - 1982

Johns-Manville Do Brazil S/A - Isolantes Termicos
 Name changed from Magnebras, S.A. - 1976
 Name changed to Johns-Manville Do Brazil Isolantes Termicos
 Ltda - 1977

Johns-Manville Dutch Brand Products Corporation
 Name changed from Van Cleef Brothers, Inc. - 1955
 Name changed to John Brand Corporation - 1970

Johns-Manville Equipment Corporation
 Incorporated - 1961
 Merged with Johns-Manville Sales Corporation - 1973

Johns-Manville, Inc.
 Name changed from H. W. Johns-Manville Company - 1920
 Dissolved - 1927

Johns-Manville Insulation Contracting & Supply Company, Inc.
Name changed from Asbestos Construction Company, Inc. - 1960
Merged into Johns-Manville Sales Corporation - 1962

Johns-Manville International Corporation
Incorporated - 1929
Merged into Manville Sales Corporation - 1986

Johns-Manville Italiana S.p.A.
Name changed from Silex S.p.A. - unknown
Name changed to Manville Italiana S.p.A. - 1982

Johns-Manville Japan, Limited
Name changed from New Materials Kabushiki Kaisha - 1978
Name changed to Manville Japan, Limited - 1981

Johns-Manville Mexicana S.A. de C.V.
Name changed from Johns-Manville de Ventas S.A. de C.V. - 1962
Name changed to Manville Mexicana S.A. de C.V. - 1982

Johns-Manville Mining and Trading
Incorporated - 1966
Merged into Johns-Manville Corporation - 1973

Johns-Manville (Overseas) Limited
Incorporated - 1958
Dissolved - 1981

Johns-Manville Products Corporation of California
Incorporated - 1956
Merged into Johns-Manville Products Corporation - 1972

Johns-Manville Products Corporation
Name changed from Johns-Manville Corporation of Delaware
- 1932
Merged with Johns-Manville Sales Corporation - 1975

Johns-Manville Products Corporation of Georgia
Incorporated - 1955
Merged into Johns-Manville Corporation - 1970

Johns-Manville Products Corporation of Massachusetts
Incorporated - 1939
Merged into Johns-Manville Products Corporation - 1972

Johns-Manville Products Corporation of Mississippi
Incorporated - 1958
Dissolved - 1966

Johns-Manville Products Corporation of Ohio
Incorporated - 1959
Dissolved - 1972

Johns-Manville Products Corporation of Oregon
Incorporated - 1956
Merged into Johns-Manville Corporation - 1962

Johns-Manville Products Corporation of Pennsylvania
Incorporated - 1940
Merged into Johns-Manville Sales Corporation - 1975

Johns-Manville S.A.
Name changed from Beton et Mollith
Divestment - 1983

Johns-Manville Sales Corporation
Incorporate - 1929
Name changed to Manville Sales Corporation - 1985

Johns-Manville Service Corporation
Name changed from Johns-Manville Construction Corporation
- 1960
Name changed to Johns-Manville Development Corporation - 1973

Johns-Manville Sudamericana, Limitada
Name changed from Johns-Manville Boley, Limited - 1955
Name changed to Manville Sudamericana, Limitada - 1982

Kingsey Falls Paper, Inc. (50% owned by Johns-Manville)
Incorporated - 1972
Sold - 1984

L. Grantham Corporation
Name changed from Grantham Mines Corporation - 1969
1972 - Acquisition
Merged into Johns-Manville Sales Corporation - 1978

Magnebras, S.A.
Incorporated - 1957
1973 - Acquisition
Name changed to Johns-Manville Do Brazil, S.A. - Isolantes
Termicos - 1976

Manvilglass, Limited
Incorporated - 1970
Name changed to Thermocoustic Insulations, Limited - 1976

Manville Covering Company
Incorporated - 1886
Merged into H. W. Johns Manufacturing Company - 1901

New Materials Kabushiki Kaisha
Incorporated - 1959
Name changed to Johns-Manville Japan, Limited - 1972

Nicely Corporation (The)
Incorporated - 1933
Dissolved - 1946

Revere Mills, Inc.
Incorporated - 1964
Name changed to Revere, Inc. - 1965

Revere, Inc.
Name changed from Revere Mills, Inc. - 1965
Merged into Crown Tuft Carpet, Inc. - 1972

Seehaver Clay and Mineral Company
Incorporated - 1946
Name changed to American Mineral Company - 1947

Silex S.p.A.
Name changed to Societa Anonima Immobiliare esari - 1940
Name changed to Johns-Manville Italiana S.p.A. - 1962

Societa Accomandita Semplice Silex
Incorporated - 1940
Merged into Societa Anonima Immobiliare Cesari - 1940

Societa Anonima Immobiliare Cesari
Incorporated - 1939
Name changed to Silex S.p.A. - 1940

Societe Anciens Etablissements Hordot and Chataignon, Flechet et Cie., Succs.
Incorporated - 1961
Name changed to Johns-Manville De France S.A. - 1961

Southern Johns-Manville Products Corporation (Delaware)
Name changed from Johns-Manville Ceiling Corporation - 1973
Merged into Johns-Manville Sales Corporation - 1979

Table Mountain Asbestos Company, Inc.
Incorporated - 1962
Dissolved - 1967

Thermocoustic Insulations, Limited
Name changed from Manvilglass, Limited - 1976
Merged into Johns-Manville Sudamericana Limitada - 1976

Van Cleef Brothers, Inc.
Name changed from Vee Cee Brothers, Inc. - 1947
Name changed to Johns-Manville Dutch Brand Products Corporation - 1955

Vee Cee Brothers, Inc.

Incorporated - 1947

Name changed to Van Cleef Brothers, Inc. - 1947

Additionally, the names of any consolidation, merger or purchase of assets of any company can be obtained by a review of the Annual Reports of Manville Corporation and related entities. Copies of such reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time agreed upon by the parties.

All of the entities identified below were engaged in the mining, milling or sale of asbestos fiber, or the manufacture or sale of asbestos containing products from their inception.

The names of the members of the Board of Directors can be obtained by a review of the Annual Reports of Manville and the related entities. Copies of such reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be made available for inspection and copying at a time convenient to the parties.

The officers of the principal Manville entities involved in the asbestos industry are as follows:

JOHNS-MANVILLE CORPORATION

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1926-27	None	H.E. Manville	A.C. Hoyt
1927-29	H.E. Manville	T.F. Merseles	L.H. Brown
1929-38	W.R. Seigle	L.H. Brown	E.M. Voorhees
1938-40	H.E. Manville	L.H. Brown	V. Brown
1940-46	None	L.H. Brown	V. Brown
1946-52	L.H. Brown	R.W. Lea	V. Brown
1952-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1957-60	A.R. Fisher	A.R. Fisher	H.M. Ball
1960-67	A.R. Fisher	C.B. Burnett	H.M. Ball
1967-71	None	C.B. Burnett	H.M. Ball
1971-73	None	W.R. Goodwin	H.M. Ball
1973-74	None	W.R. Goodwin	J.A. McKinney G.E. Parker
1974-75	None	W.R. Goodwin	A.B. Marchant G.E. Parker
1975-76	None	W.R. Goodwin	J.A. McKinney G.E. Parker
1976-77	None	J.A. McKinney	G.E. Parker
1977-78	J.A. McKinney	J.A. McKinney	G.E. Parker
1978-82	J.A. McKinney	F.L. Pundsack	G.E. Parker

1982-83	J.A. McKinney	J.A. McKinney	G.E. Parker
1983-84	J.A. McKinney	J.A. McKinney	R.A. Boardman
1984-86	J.A. McKinney	J.T. Hulce	R.A. Boardman
1986-Present	G.C. Dillon	W.T. Stephens	R.A. Boardman

JOHNS-MANVILLE SALES CORPORATION

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1929-30	None	L.R. Hoff	C.L. Sager
1931	L.H. Brown	L.R. Hoff	C.L. Sager
1932-35	L.H. Brown	L.R. Hoff	E.M. Voorhees
1936-45	L.H. Brown	L.R. Hoff	V. Brown
1946	None	L.H. Brown	V. Brown
1947-50	L.H. Brown	R.W. Lea	V. Brown
1951-52	L.M. Cassidy	A.R. Fisher	V. Brown
1953-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-68	None	C.B. Burnett	H.M. Ball
1969-72	None	G.H. Martens	H.M. Ball
1973	None	None	J.A. McKinney
1974-75	None	R.J. Cuje	J.A. McKinney
1976	None	W.R. Goodwin	J.A. McKinney
1976-81	None	J.A. McKinney	G.E. Parker
1/82-10/82	J.A. McKinney	F.L. Pundsack	G.E. Parker
10/82-83	J.A. McKinney	J.T. Hulce	G.E. Parker
1983-85	J.A. McKinney	J.T. Hulce	R.A. Boardman
12/31/85	Name changed to Manville Sales Corporation		
12/85-4/86	J.A. McKinney	J.T. Hulce	R.A. Boardman
4/86-10/86	J.A. McKinney	W.T. Stephens	R.A. Boardman
10/86-Present	None	W.T. Stephens	R.A. Boardman

JOHNS-MANVILLE PRODUCTS CORPORATION

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1927	None	W.R. Seigle	A.C. Hoyt
1928-31	None	W.R. Seigle	E.M. Voorhees
1932-42	L.H. Brown	S.A. Williams	V. Brown
1943	L.H. Brown	S.A. Williams	R. Hackney
1944-45	L.H. Brown	S.A. Williams	V. Brown
1946	None	L.H. Brown	V. Brown

1947-50	L.H. Brown	R.W. Lea	V. Brown
1951	None	L.M. Cassidy	V. Brown
1952	L.M. Cassidy	A.R. Fisher	V. Brown
1953-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-68	None	C.B. Burnett	H.M. Ball
1969-72	None	F.E. Dutcher	H.M. Ball
1973	None	F.E. Dutcher	J.A. McKinney
1974-75	None	J.E. Hesse	J.A. McKinney

Johns-Manville Products Corporation merged into Johns-Manville Sales Corporation effective 12/31/75.

JOHNS-MANVILLE CANADA, INC.

<u>Year</u>	<u>Chairman of The Board</u>	<u>President</u>	<u>Secretary</u>
1918-19	None	G.W. McDougall	J.G. Cartwright
1919-25	None	T.F. Manville	H.E. Manville
1925-27	None	H.E. Manville	H.E. Manville
1927-28	None	H.E. Manville	A.C. Hoyt
1928-29	None	T.F. Merseles	A.C. Hoyt
1929-30	None	T.F. Merseles	E.M. Voorhees
1930-37	None	L.H. Brown	E.M. Voorhees
1937-39	None	L.H. Brown	V. Brown
1939-45	L.H. Brown	S.A. Williams	V. Brown
1945-46	L.H. Brown	R.W. Lea	V. Brown
1946-51	L.H. Brown	L.H. Brown	V. Brown
1951-52	L.M. Cassidy	L.M. Cassidy	H.M. Ball
1952-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1957-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1959-61	A.R. Fisher	C.B. Burnett	H.M. Ball
1961-67	K.V. Lindell	A.G. Sinclair	W.H. Soutar
1967-71	K.V. Lindell	A.G. Sinclair	J. Kaczkowski
1971-72	None	A.G. Sinclair	G.A. Piche
1972-73	None	J.R.M. Hutcheson	G.A. Piche
1973-74	None	J.R.M. Hutcheson	G.A. Piche
1974-82	J.R.M. Hutcheson	G.P. Loubert	G.A. Piche
1982-83	J.P. Power	J.P. Power	G.A. Piche

Johns-Manville Canada, Inc. was sold 9/16/83.

JOHNS-MANVILLE INTERNATIONAL CORPORATION

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1929-32	L.H. Brown	W.R. Seigle	C.L. Sager
1932-36	L.H. Brown	W.R. Seigle	E.M. Voorhees
1936-37	L.H. Brown	W.R. Seigle	V. Brown
1937-46	L.H. Brown	E.S. Crosby	V. Brown
1946-50	R.W. Lea	E.S. Crosby	V. Brown
1950-51	L.H. Brown	R.W. Lea	V. Brown
1951-52	L.M. Cassidy	A.R. Fischer	V. Brown
1952-57	L.M. Cassidy	A.R. Fischer	H.M. Ball
1957-60	A.R. Fischer	A.R. Fischer	H.M. Ball
1960-68	None	C.B. Burnett	H.M. Ball
1968-72	None	D.T. Colton	H.M. Ball
1972-73	None	J.B. Jobe	W.P.S. Breese
1973-74	None	W.L. VanDerBeek	W.P.S. Breese
1974-75	None	H.B. Moreno	W.P.S. Breese
3/75-5/75	None	H.B. Moreno	J.T. Hulce
1975-80	None	H.B. Moreno	G.E. Parker
1980-83	None	A.L. Cini	J.L. Brown
1983-86	None	J.T. Hulce	J.L. Brown
1985-3/86	None	J.P. Cashman	J.L. Brown
3/86-12/86	None	S.R. Heath	J.L. Brown

Johns-Manville International Corporation merged into Manville Sales Corporation effective 12/22/86.

JOHNS-MANVILLE AMIANTE CANADA, INC.

<u>Year</u>	Chairman of <u>The Board</u>	<u>President</u>	<u>Secretary</u>
1954	None	R.D. Weldon	R.T. Clarkson
1954-57	L.M. Cassidy	A.R. Fisher	H.M. Ball
1958-59	A.R. Fisher	A.R. Fisher	H.M. Ball
1960	None	C.B. Burnett	H.M. Ball
1961-66	None	K.V. Lindell	W.H. Soutar
1967-70	None	K.V. Lindell	J. Kaczkowski
1971-81	None	J.R.M. Hutcheson	G.A. Piche
1982-83	J.P. Power	J.P. Power	G.A. Piche

Johns-Manville Amiante Canada, Inc. was sold 9/16/83.

B.5. From the year 1925 until the present, identify and state the address of any organization in which defendant, its officers, agents or employees have belonged, having anything to do

with setting standards, regulations or the conducting of research into the use of asbestos, asbestos products or asbestos fiber.

ANSWER: Manville Corporation or related entities belonged to the American Society for Testing and Materials hereafter referred to as "ASTM") which is a nonprofit corporation formed in 1898 for the development of standards on characteristics and performance of materials, products, systems, and services, and the promotion of related knowledge. The ASTM is the world's largest source of voluntary consensus standards. See also answer to Interrogatory No. B.6.

Manville Corporation or related entities belonged to the following organizations which conducted research regarding the health effects of exposure to asbestos or asbestos containing products:

Asbestos Cement Pipe Producers Association
1745 Jefferson Davis Highway
Arlington, VA 22209
(approximately 1972 to early 1980s)

Asbestos Information Association/North America
1745 Jefferson Davis Highway
Arlington, VA 22202
(approximately 1971 to early 1980s)

Asbestos Textile Institute
P.O. Box 471
Willow Grove, PA 19090
(November 16, 1944 to 1973)

Canadian Asbestos Information Centre
(formerly Institute of Occupational and Environmental Health)
1130 Sherbrooke Street West, Suite 410
Montreal, Quebec
H3A 2H8 CANADA
(1966 to 1983)

Industrial Health Foundation
(formerly Industrial Hygiene Foundation)
34 Penn Circle West
Pittsburgh, PA 15206
(1936 through 1980s)

National Insulation Contractors Association
address unknown
(1954 through 1980s)

National Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, NY 10017
(approximately 1958 to 1968)

Quebec Asbestos Mining Association
Suite 412, 5 Place Ville Marie
Montreal, Quebec
H3B 2G2 Canada
(approximately 1930 to 1983)

Thermal Insulation Manufacturers Association, Inc.
441 Lexington Avenue
New York, NY 10017
(approximately 1969 through 1980s)

B.6. Has defendant ever been a member of or affiliated with any trade groups, professional associations or organizations? If so, identify each such group, association or organization and set forth the inclusive dates of defendant's membership in each.

ANSWER: In addition to the organizations identified in answer to Interrogatory No. B.5., Manville Corporation or related entities belong or have belonged to the following organizations which related to asbestos or asbestos containing products:

American Society for Testing and Materials
1916 Race Street
Philadelphia, PA 19103
(approximately 1930s through 1980s)

Asbestos Cement Product Association (defunct)
New York, NY
(approximately 1955 to 1967)

Automotive Parts Rebuilders Association
6849 Old Dominion Drive
McLean, VA 22101
(approximately 1950 to 1972)

Brake Lining Materials Association (defunct)
370 Lexington Avenue
New York, NY 10017
(approximately 1926 to 1949)

Friction Materials Standards Institute
E-210 State Highway, Number 4
Paramus, NJ 07652
(approximately 1949 to 1972)

Mid-West Insulation Contractor's Association
2202 Hanscom Boulevard
Omaha, NE 68105
(approximately 1962 through 1980s)

National Building Material Distributors Association
1701 Lake Avenue
Glenview, IL 60025
(1966 through 1980s)

Resilient Floor Covering Institute
966 Hungerford Drive
Suite 12-B
Rockville, MD 20850
(1978 through 1980s)

Southwest Insulation Contractor's Association
1406 Third National Bank Building
Dayton, OH 45402
(sometime after 1958 to present)

Western Insulation Contractor's Association
83 Hazel Lane
Piedmont, CA 94611
(1955 to present)

B.7. Has defendant ever been a member of or affiliated with the Asbestos Textile Institute? If so, indicate when your company was affiliated or was a member of this organization.

ANSWER: See answer to Interrogatory No. B.5.

B.8. Does your company publish or distribute a manual or booklet which describes the nature of the business that defendant is engaged in? If so, set forth the title of such manual or booklet, indicate when it was published and attach a copy of same hereto.

ANSWER: Manville Corporation publishes an Annual Report to Shareholders, and also files quarterly and annual reports with the Securities and Exchange Commission. These reports are public records. Copies of the Annual Reports are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

The Fund prepares and files quarterly reports to the United States Bankruptcy Court, Southern District of New York. Copies of the Fund's quarterly reports to the Bankruptcy Court will be produced at a time and place agreed upon by the parties.

B.9. Has any employee or representative of your corporation ever attended a meeting of the Asbestos Textile

Institute? If so, identify each such individual who attended these meetings and set forth the dates on which each such individual went to such a conference or meeting.

ANSWER: Employees of Manville Corporation or related entities attended meetings of the Asbestos Textile Institute. The minutes of the Asbestos Textile Institute indicate the individuals in attendance at each meeting, as well as their affiliations. Copies of these minutes are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

B.10. Has your company ever been a member of, affiliated with or provided funding for the Industrial Hygiene Foundation? If so, indicate when your company was a member or affiliated with this organization and set forth the dates, if applicable, when you provided funding to this organization.

ANSWER: Yes. See answers to Interrogatories No. B.5 and B.24.

B.11. Does your company have a Board of Directors?

ANSWER: Manville Corporation has a Board of Directors. The Fund does not have a Board of Directors.

B.12. Does your company's Board of Directors conduct meetings?

ANSWER: The Board of Directors of Manville Corporation conducts meetings.

B.13. Have minutes of the Board of Directors meetings been taken and maintained by your company? If so, indicate who has custody of the minutes at this time.

ANSWER: Minutes are kept of the Manville Corporation Board of Directors meetings. Copies of the non-privileged portions of these minutes are located at the records repository maintained by the Fund in Denver, Colorado, and will be produced at a time convenient to the parties.

B.14. Has your company, and/or its subsidiaries or affiliates ever manufactured or distributed asbestos containing products?

ANSWER: Manville Corporation or related entities have manufactured or distributed asbestos and asbestos containing products.

B.15. Give a complete and detailed description of the particular qualities that asbestos has or had that caused your

company and/or its subsidiary or affiliate to utilize asbestos in your products.

ANSWER: Asbestos was used by Manville Corporation or related entities in a variety of products for a variety of reasons. Generally, however, asbestos was valued because of its strength, low conductivity, light weight, resistance to corrosion and fire, cost, availability, and the lack of substitute materials.

B.16. Did any of the entities from whom you received asbestos fiber or any of the entities referred to in B.6., B.7., B.9. and B.10. ever inform you or your company's employees that asbestos was potentially hazardous to the health of individuals who were exposed to it?

ANSWER: Yes. Some of the organizations listed sponsored or co-sponsored studies regarding the health effects of asbestos exposure, and the results of those studies were generally shared among members. In addition, some of these organizations prepared or distributed materials which addressed asbestos health issues. The Asbestos Cement Pipe Producers Association, Asbestos Information Association, Asbestos Textile Institute, the Canadian Asbestos Information Centre, Industrial Health Foundation, National Insulation Contractors Association, National Insulation Manufacturers Association and the Quebec Asbestos Mining Association have all been involved from time to time in either health research or in distribution and dissemination of information regarding the possible hazards associated with asbestos exposure. See answer to Interrogatory No. B.21.

All of these activities are reflected in the minutes of Association meetings and in correspondence between representatives of the various member organizations relating to asbestos health issues. Such documents will be produced at the records repository maintained by the Fund in Denver, Colorado at a time convenient to the parties. See answer to Interrogatory No. B.39.

B.17. If so, for each such company that transmitted such information to you and your company, set forth the following information:

- a. the name of each and every entity that informed your company that asbestos was potentially hazardous to health;
- b. the dates you received this information from each such company;
- c. indicate how this information was transmitted to you;
- d. the substance of each warning;

- e. annex hereto copies of each such warning.

ANSWER: See answer to Interrogatory No. B.16.

B.13. Has defendant distributed or sold asbestos or asbestos containing products in the State of New Jersey? If so, set forth the following information:

- a. the date that defendant commenced selling asbestos or asbestos containing products in the State of New Jersey;

- b. the date the defendant terminated the sale of asbestos or asbestos containing products in the State of New Jersey;

- c. the areas of New Jersey where asbestos or asbestos containing products were sold.

ANSWER: Manville Corporation or related entities sold asbestos and asbestos containing products in New Jersey for the past several decades. See answer to Interrogatory No. B.4.

B.19. Did defendant ever affix any warnings to any of the asbestos or asbestos containing products it marketed and distributed? If so, for each such product that contained a warning, set forth the following information?

- a. the brand and trade name of each such product that contained a warning;

- b. the date a warning was attached to each such product;

- c. the substance of each warning;

- d. annex hereto copies of each such warning.

ANSWER: Manville Corporation or related entities placed warning labels on the packaging of its industrial thermal insulation products containing asbestos which might release dust upon installation. These labels and dates of use are as follows:

1964 to 1970

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.

INHALATION OF ASBESTOS IN EXCESSIVE
QUANTITIES OVER LONG PERIODS OF TIME
MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT
IS HANDLED, AVOID BREATHING THE DUST.

IF ADEQUATE VENTILATION CONTROL IS NOT
POSSIBLE, WEAR RESPIRATORS APPROVED BY
THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS-
PRODUCING DUSTS.

1970 to 1972

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER.
AVOID BREATHING THE DUST. INHALATION
OF ASBESTOS IN EXCESSIVE QUANTITIES
OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT
IS HANDLED, USE PROPER PROTECTION.

IF PROPER DUST CONTROL CANNOT BE PROVIDED,
RESPIRATORS APPROVED BY THE U.S. BUREAU OF
MINES FOR PROTECTION AGAINST THE PNEUMOCONIOSIS-
PRODUCING DUSTS SHOULD BE WORN.

1972 to 1978

CAUTION

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

1978 to 1985

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID BREATHING DUST

BREATHING ASBESTOS DUST MAY
CAUSE SERIOUS BODILY HARM

SMOKING GREATLY INCREASES THE
RISK OF SERIOUS BODILY HARM

Manville began using such warning notices because in 1964 it was reported by a member of the medical profession that there might exist a risk to some persons who installed industrial insulation products containing asbestos, in that inhalation of excessive quantities of asbestos fibers over prolonged periods of time under certain conditions might create a risk of contracting asbestosis to some persons.

The label in use from 1972 to 1978 was prescribed by the United States Department of Labor, Occupational Safety and Health Administration (OSHA) pursuant to 29 C.F.R., Sec. 1910.1001, such regulation being promulgated by OSHA in 1972. This label was revised by Manville to include a no-smoking warning, implementation of which commenced in November 1978. In addition, product literature was available from sales personnel.

In addition, Manville placed warning notices on the packaging of its asbestos fiber. The warning labels and the dates of use are as follows:

1969 to 1972

CAUTION

THIS BAG CONTAINS ASBESTOS FIBER.

PERSONS EXPOSED TO THIS MATERIAL SHOULD
USE ADEQUATE PROTECTIVE DEVICES AS
INHALATION OF THIS MATERIAL OVER LONG
PERIODS MAY BE HARMFUL.

1972 to 1978

CAUTION

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

1978 to 1983

CAUTION
CONTAINS ASBESTOS FIBER
AVOID CREATING DUST
BREATHING ASBESTOS MAY CAUSE
SERIOUS BODILY HARM
SMOKING GREATLY INCREASES THE
RISK OF SERIOUS BODILY HARM

Use of warning labels commenced during 1969. The label in use from 1972 to 1978 was prescribed by the United States Department of Labor, Occupational Safety and Health Administration (OSHA) pursuant to 29 C.F.R., Sec. 1910.1001, such regulation being promulgated by OSHA in 1972. This label was revised by Manville to include a no-smoking warning, implementation of which commenced in November 1978. Manville also placed this warning on all bags containing asbestos fiber in five additional languages; i.e.: French, Dutch, German, Spanish and Japanese. Additional language may have been used from time to time.

See also answer to Interrogatory No. C.9. for identification of the brand or trade name of products, products containing a label, and the date the label was attached to such products.

B.20. Set forth the name, address and job position of each and every individual who took part in your company's decision to place a warning on its asbestos or asbestos containing products.

ANSWER: The selection of the wording of the text of the warning labels was made by a group of individuals representing the following departments at Manville: Environmental Control, Employee Relations, Executive, Legal and Product Marketing. The 1972 change in labeling was mandated by the federal government under the Occupational Safety and Health Act of 1970 and the standard promulgated thereunder for exposure to asbestos.

Beginning in the fall of 1974, all corporate labeling activities were within the jurisdiction of the Corporate Labeling Committee. Chairman of the Corporate Labeling Committee was Paul Kotin, M.D., Senior Vice President of Johns-Manville Corporation, Health, Safety and Environment Department, until his retirement in September, 1981.

On information and belief, the labeling of products at Manville Corporation is currently under the direct responsibility of each Product Manager in conjunction with the Corporate Labeling Committee, which consists of representatives from the operating

groups, Legal Department and Health Safety and Environment Department.

The following individuals have also been involved in the labeling of Manville Products:

Herbert M. Ball
(Deceased)

William P. S. Breese
255 Brookside Court
Knollwood, CO 80302

Edmund M. Fenner
(Deceased)

Hugh M. Jackson
5205 Sky Trail
Littleton, CO 80123

J. B. Jobe
2800 S. University, #64
Denver, CO 80210

J. P. Leineweber
(Deceased)

Irving J. Pedley
10015 Royal Oak Road, #348 3164
Sun City, AZ 85351

William B. Reitze
10870 Park Ridge Road
Littleton, CO 80123

Clifford L. Sheckler
(Deceased)

Kenneth W. Smith, M.D.
(Deceased)

B.21. Prior to 1964, did any employee of the defendant ever recommend that it utilize a warning on its asbestos containing products? If so, identify each such employee, indicate when he made such a recommendation, indicate what the recommendation was, to whom it was given and what action was taken thereon.

ANSWER: In 1944, Manville employees discussed a proposed California regulation which would have required the labeling of materials which contained one percent of asbestos or silica, if the materials "were to be used under conditions likely to give rise to dust." No warning or caution labels were adopted at that time.

In 1952, some employees of Manville or related entities discussed the possibility of placing a caution label on asbestos fiber shipped to Illinois, in an effort to observe rules and regulations promulgated by the Industrial Commission of Illinois which required the labeling of substances harmful to the health and safety of employees which, subsequently, may have included asbestos fiber.

In approximately July, 1958, some employees of Manville Corporation or related entities discussed the possibility of placing a caution label on sheets of Marinite and other asbestos products. The individuals involved in these discussions included the following:

Herbert M. Ball
William P. S. Breese
Thomas H. Eaton
E. D. Flavin
D. L. Hinmon
W. G. Hoffer
Hugh M. Jackson
J. B. Jobe
V. B. Padham
Irving J. Pedley
A. M. Schmidt
Kenneth W. Smith

It is not clear whether a recommendation was made, and if so, by whom. However, the decision was made to provide additional information regarding safe work practices in product literature relating to asbestos containing board products. No caution labels were adopted at that time.

See answer to Interrogatory No. B.20.

B.22. Has defendant ever established or maintained a library or libraries which in any way dealt with industrial hygiene, medicine, safety and engineering? If so, state:

- a. where the library was or is located;
- b. the names of all journals which that library subscribed to;
- c. for whom and for what purpose the library was established;
- d. whether there is an inventory of the books and publications which are or were in this library, and if so, attached a copy hereto.