

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

Viola Foster, Individually and as the Personal Representative of the Estate of John W. Murray, Deceased,	)	Civil Action No. 88-1222
	)	
Paul H. Sligh, Sr. and Sallie Sligh,	)	Civil Action No. 88-475
	)	
Charles Berglund	)	Civil Action No. 88-112
	)	
Barbara A. Piquet, Individually and as the Personal Representative of the Estate of Agusta D. Picquet, Deceased,	)	Civil Action No. 88-1876
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
Owens-Illinois, Inc., et al.,	)	
	)	
Defendants.	)	

RESPONSES OF DEFENDANT NATIONAL GYPSUM
COMPANY TO PLAINTIFFS' REQUEST FOR ADMISSIONS

Defendant National Gypsum Company ("National Gypsum")
responds to Plaintiffs' Request for Admissions as follows:

GENERAL OBJECTIONS

Defendant National Gypsum objects to any request that
purports to impose upon defendant any objection not expressly set
forth in the Federal Rules of Civil Procedure.

National Gypsum objects to these requests as irrelevant,
since conditions in National Gypsum's plants are not at issue in



these cases. All of the compensation claims that are the subject of these requests were filed by workers employed at plants which used large amounts of raw asbestos fiber and portland cement to manufacture asbestos-cement products, such as siding and flat sheets. None of these employees worked with or installed finished products.

RESPONSES

1. Do you admit that a claim was filed by Peter Paul Armenti prior to January 27, 1959, alleging asbestosis and naming National Gypsum as a defendant in the action?

RESPONSE: Admitted.

2. Do you admit that a judgment was entered on January 27, 1959, in the matter referred to in request no. 1 above?

RESPONSE: Admitted.

3. Do you admit that a claim was filed on behalf of Louis D. Cavinato prior to April 19, 1965, alleging asbestosis and that judgment was entered on April 19, 1965?

RESPONSE: Admitted.

4. Do you admit that a claim was filed on behalf of Alton Eugene Bass on February 28, 1968, alleging injuries including asbestosis?

RESPONSE: Admitted.



5. Do you admit that a claim was filed on behalf of Louis Gremillion prior to May 31, 1968, alleging injuries including asbestosis and that judgment was entered on May 31, 1968?

RESPONSE: Admitted.

6. Do you admit that National Gypsum was an associated non-voting member of the Asbestos Textile Institute from September 1959 to December 1962?

RESPONSE: Admitted.

7. Do you admit that National Gypsum had notice of each of the claims listed in Request Numbers 1, 3, 4 and 5 at the time listed above for each claim?

RESPONSE: Admitted.

NELSON, MULLINS, RILEY & SCARBOROUGH

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Attorneys for Defendant National
Gypsum Company

Columbia, South Carolina

Dec 22, 1988.



85.

By:

PLAINTIFF'S
EXHIBIT
5567-14

CERTIFICATE OF SERVICE

I, the undersigned, of the law offices of Nelson, Mullins, Riley & Scarborough, attorneys for National Gypsum, Corporation do hereby certify that I have served Counsel for the Plaintiff in this action with a copy of the pleadings herein below specified by causing a copy of the same to be mailed by United States Mail, postage prepaid, to Counsel for the Plaintiff at the following address:

Pleadings: DEFENDANT'S RESPONSE TO PLAINTIFF'S
REQUEST TO ADMIT

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