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Attorneys for Defendant
The Rockbestos Company

SUPERIOR COURT OF CALIFORNIA - COUNTY OF SOLANO

In Re: No. 2830

COMPLEX ASBESTOS LITIGATION THE ROCKBESTOS COMPANY'S
RESPONSES TO GENERAL ORDER
NO. 30.00 INTERROGATORIES

The Rockbestos Company ("Rockbestos"), responds to
plaintiffs' standard interrogatories pursuant to General Order
No. 30.00 as follows:

I



PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Rockbestos objects to the interrogatories on the
grounds that they exceed the permissible scope of discovery as
defined by CCP 2017, and seek information which is neither
relevant to the subject matter of this action nor reasonably
calculated to lead to the discovery of admissible evidence.

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1 at the hearing on the motion for the order consolidating
2 discovery and has had no opportunity to be heard with regard to
3 that order or to the form of discovery propounded. Rockbestos
4 further objects on the ground that it has never stipulated to
5 adoption of these interrogatories by the Solano County Superior
6 Court. As such Rockbestos asserts that any obligation to respond
7 to plaintiff's standard interrogatories is unenforceable under
8 the Code of Civil Procedure and is a denial of due process of
9 law. Thus, to the extent the interrogatories do not comply with
10 the Civil Discovery Act of 1986, C.C.P. Section 2016 et seq.,
11 which sets forth the California legislature's governing
12 provisions pertaining to interrogatories, Rockbestos objects.

13
14 More specifically, Rockbestos objects to the
15 interrogatories in that the interrogatories and their subparts
16 exceed the Statutory number permitted by CCP 2030(c). In
17 addition, Rockbestos objects to the interrogatories to the extent
18 that many of the interrogatories are not complete in and of
19 themselves, or contain subparts, are compound, conjunctive or
20 disjunctive in violation of CCP 2030(c)(5). Moreover, the
21 interrogatories contain instructions and "definitions" which do
22 not comply with CCP 2030(c)(5), are overbroad, vague,
23 inconsistent with normal usage and meaning and are
24 unintelligible. Accordingly, the responses utilize those terms
25 as they are commonly understood.

26
27 Rockbestos objects to the interrogatories on the
28 grounds that they seek "corporate knowledge" because it is

1 impossible for Rockbestos to set forth a collective knowledge of
2 all Rockbestos employees, past and present. The information
3 contained in the interrogatory responses has been assembled by
4 authorized employees and counsel for Rockbestos. It is
5 impossible to reconstruct each step in the information gathering
6 process or to state that all pertinent documents have been
7 discovered and examined. It is also impossible to state that all
8 individuals with relevant knowledge have been contacted to this
9 point. Investigation continues and Rockbestos specifically
10 reserves the right to revise, correct, supplement and amend these
11 interrogatory responses.

12
13 Rockbestos has never mined asbestos fiber or
14 manufactured asbestos thermal insulation. Many of the
15 interrogatories request information relating to the mining of
16 asbestos and the processes utilized in manufacturing raw
17 asbestos. Rockbestos objects to these and other interrogatories,
18 propounded as a boilerplate set of interrogatories in that they
19 are not designed to elicit discoverable information from
20 Rockbestos.

21
22 Rockbestos does not waive any objection, on any ground,
23 whether or not asserted herein, to the interrogatories or to the
24 admission of the interrogatories and responses at trial.
25 Furthermore, Rockbestos reserves the right to assert further
26 objections to the interrogatories. The preliminary statement and
27 general objections contained herein are specifically made a part
28

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1 of and incorporated by reference into each of the responses set
2 forth below.

3
4 Response to Interrogatory No. 1:

5
6 See Preliminary Statement and General Objections.
7 Notwithstanding these objections, Rockbestos responds:

8
9 a. George Littlehales;

10
11 b. The Rockbestos Company, 285 Nicoll Street, New
12 Haven, Connecticut 06504;

13
14 c. Quality Assurance Manager;

15	16 d. Dates of Employment	17 Position Held
18	1967-1968	Personnel Mgr.
19	1968-1971	Materials Mgr.
20	1971-1973	Superintendent
21	1973-Present	Quality Assurance Mgr.

22
23
24 Response to Interrogatory No. 2:

25
26 See preliminary statement and general objections.
27 Notwithstanding these objections, Rockbestos responds:
28

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1 a. - e. The Rockbestos Company was incorporated on
2 March 1, 1923. It is a Delaware Corporation with its principal
3 place of business at 285 Nicoll Street, New Haven, Connecticut
4 06504.

5
6 Response to Interrogatory No. 3:

7
8 See Preliminary Statement and General Objections.
9 Notwithstanding these objections, Rockbestos responds:

10
11 Rockbestos was known as Rockbestos Products Corporation
12 dating from March 1, 1923. In 1959 it became a division of Cerro
13 Corporation. In 1984, it became The Rockbestos Company.

14
15 Response to Interrogatory No. 4:

16
17 See Preliminary Statement and General Objections.
18 Notwithstanding these objections, Rockbestos responds:

19
20 Rockbestos has maintained a Certificate of Authority to
21 do business in California from January 29, 1981 to the present
22 date.

23
24 Response to Interrogatory No. 5:

25
26 See Preliminary Statement and General Objections.
27 Rockbestos further objects to this interrogatory on the grounds
28

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1 that it is overbroad, burdensome and oppressive. Notwithstanding
2 these objections, Rockbestos responds:

3
4 Rockbestos has never had a department, division,
5 subdivision, branch or group specifically responsible for the
6 design, development, manufacture, testing and use of
7 asbestos-containing products. Refer to Response to Interrogatory
8 No. 8.

9
10 Response to Interrogatory No. 6:

11
12 See Preliminary Statement and General Objections.
13 Rockbestos further objects to this interrogatory on the grounds
14 that it is overbroad, burdensome and oppressive. The
15 interrogatory requests detailed information not reasonably
16 calculated to lead to the discovery of admissible evidence and
17 which falls outside the scope of this litigation.
18 Notwithstanding these objections, Rockbestos responds:

19
20 No.

21
22 Response to Interrogatory No. 7:

23
24 See Preliminary Statement and General Objections.
25 Rockbestos further objects to this interrogatory on the grounds
26 that it is overbroad, burdensome and oppressive. The
27 interrogatory requests detailed information not reasonably
28 calculated to lead to the discovery of admissible evidence and

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1 which falls outside the scope of this litigation.

2 Notwithstanding these objections, Rockbestos responds:

3
4 No.

5
6 Response to Interrogatory No. 8:

7
8 See Preliminary Statement and General Objections. The
9 subparts of this interrogatory request information so burdensome
10 to ascertain, as to be unjust, harassing, annoying and oppressive
11 because the information relates to numerous products manufactured
12 during a 61 year period and the request is not limited to
13 products allegedly used by plaintiff/plaintiff's decedent or
14 allegedly sold and/or supplied to plaintiff's/plaintiff's
15 decedent's employers during the period of plaintiff's/plaintiff's
16 decedent's employment. In addition, the interrogatory requests
17 detailed information not reasonably calculated to lead to the
18 discovery of admissible evidence and which falls outside the
19 scope of this litigation. Notwithstanding these objections,
20 Rockbestos responds:

21
22 Plaintiff has not established that
23 plaintiff/plaintiff's decedent utilized any product manufactured
24 by Rockbestos. Rockbestos will attempt to provide all known,
25 pertinent information for products identified by
26 plaintiff/plaintiff's decedent.

27
28 a. Since 1930 Rockbestos has manufactured and marketed

1 wire and cable products, some of which contained encapsulated and
2 saturated asbestos. These products included: apparatus and
3 motor lead wire, appliance and fixture wire, control cable, power
4 cable, switchboard wire, high temperature wire, furnace and mud
5 gun cable, shipboard cable and instrumentation cable, and may
6 also have been referenced by National Electric Code and other
7 specifications and designations. Rockbestos utilized various
8 brand names and trademarks during this period, including,
9 Firezone, Firewall, Rocktherm, Pyrotrol, Phosroc, Cryozone and
10 H-Zone;

11
12 b. - c. Refer to Response to Interrogatory No. 8 a.;

13
14 Some of the following wire and cable products contained
15 encapsulated and saturated asbestos during the indicated periods.

16	17 <u>Wire/Cable Products</u>	18 <u>Approx. Dates of Manufacture</u>
19	Apparatus wire	1936 to 1985
20	Motor lead wire	1930 to 1985
21	Appliance and fixture wire	1930 to 1985
22	Control cable	1930 to 1985
23	Power cable	1930 to 1985
24	Switchboard wire	1930 to 1985
25	High temperature wire	1938 to 1985
26	Furnace and mud gun cable	1974 to 1980
27	Shipboard cable	1930 to 1979
28	Instrument cable	1930 to 1977

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1 d. (i)-(iii) It would be unduly burdensome to provide the
2 chemical composition of each such product because Rockbestos
3 manufactured many different wire and cable products during the
4 sixty-one year period and the percentage of asbestos utilized in
5 each product varied broadly over time and with the size of the
6 wire and cable. To the extent possible, Rockbestos will attempt
7 to provide this information for products to which
8 plaintiff/plaintiff's decedent alleges exposure. Rockbestos used
9 only chrysotile asbestos in manufacturing wire and cable products
10 with insulation containing encapsulated and saturated asbestos.

11
12 The following are examples:

13
14 **YEAR 1981**

15
16 Product

17 #14 Firezone 101
18 (High Temperature TAGT)

19 Components

20 Nickel clad conductor	47.4
21 Teflon tape	9.3
22 Teflon coated glass yarn	13.0
23 Teflon finish compound	1.6
24 Glass yarn	4.9
25 Silicone and resin finish compounds	9.7
26 Lap: Asbestos	12.1
27 Other non asbestos components	2.0

28

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1 YEAR: 1979

2

3 Product:

4 #14 AVA

5 Components

%

6 Copper conductor

55.5

7 Tape

.5

8 Mylar

.7

9 Saturant

29.5

10 Varnished cambric tape

12.8

11 Lap and yarn: Asbestos

23.6

12 Other non-asbestos components

4.1

13

14 YEAR: 1981:

15

16 Product

17 #8 AVA

18 Components

%

19 Copper conductor

55.5

20 Nomex tape

.4

21 Mylar

.5

22 Varnished cambric tape

9.2

23 Saturant

18.4

24 Lap and yarn: Asbestos

13.4

25 Other non-asbestos components

2.4

26

27

28 e. Wire and cable;

1 f. It would be unduly burdensome to provide a
2 description of the physical appearance and nature of each
3 product. To the extent possible, Rockbestos will attempt to
4 provide this information for products to which
5 plaintiff/plaintiff's decedent alleges exposure. The wire and
6 cable products generally did not have any external markings,
7 although the boxes, spools or reels containing the products
8 generally were marked or tagged with the names Cerro or
9 Rockbestos, the brand or trade names Firezone, Firewall,
10 Rocktherm, Pyrotrol, Phosroc, Cryozone or H-Zone, an hourglass
11 within a circle or other distinctive markings. In general, wire
12 and cable products were marked internally with marker threads;

13
14 g. It would be unduly burdensome to provide a
15 detailed description of the intended use of each product. To the
16 extent possible, Rockbestos will attempt to provide this
17 information for products to which plaintiff/plaintiff's decedent
18 alleges exposure. The intended use of wire and cable products
19 with insulation containing encapsulated and saturated asbestos is
20 in those applications requiring resistance to high temperature
21 and flame, and as required in military, government and trade
22 specifications for certain wire and cable construction;

23
24 h. - i. The suppliers of asbestos containing products
25 include:

26 1. Raybestos-Manhattan Corp.

27 Products: Lap, roving yarn.

28 Dates: 1945-1986

1 2. Amatex Corp.

2 Products: Roving yarn.

3 Dates: 1976-1986

4 3. Harco Chemical

5 Products: Cable filler

6 Dates: 1950-1986

7 4. Manning Paper Co.

8 Products: S.A. Asbestos tape

9 Dates: 1970-1986

10 5. Facile Div. Sun Chemical Corp.

11 Products: AM - Asbestos Mylar Tape

12 Dates: 1970-1986

13 6. Johns-Manville Corp.

14 Products: AM - Asbestos Mylar Tape

15 Dates: 1976-1986

16
17 j. Currently unknown, but investigation is continuing.

18
19 Response to Interrogatory No. 9:

20
21 See Preliminary Statement and General Objections.

22 Rockbestos further objects to this interrogatory on the grounds
23 that it is overbroad, burdensome and oppressive. The
24 interrogatory requests detailed information not reasonably
25 calculated to lead to the discovery of admissible evidence and
26 which falls outside the scope of this litigation.

27 Notwithstanding these objections, Rockbestos responds:

28 No.

Response to Interrogatory No. 10:

See Preliminary Statement and General Objections. Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 11:

See Preliminary Statement and General Objections. Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 12:

See Preliminary Statement and General Objections. Rockbestos further objects to this interrogatory on the grounds

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1 that it is overbroad, burdensome and oppressive. The
2 interrogatory requests detailed information not reasonably
3 calculated to lead to the discovery of admissible evidence and
4 which falls outside the scope of this litigation.

5 Notwithstanding these objections, Rockbestos responds:

6
7 No.

8
9 Response to Interrogatory No. 13:

10
11 See Preliminary Statement and General Objections.

12 Rockbestos further objects to this interrogatory on the grounds
13 that it is overbroad, burdensome and oppressive. The
14 interrogatory requests detailed information not reasonably
15 calculated to lead to the discovery of admissible evidence and
16 which falls outside the scope of this litigation.

17 Notwithstanding these objections, Rockbestos responds:

18
19 No.

20
21 Response to Interrogatory No. 14:

22
23 See Preliminary Statement and General Objections.

24 Rockbestos further objects to this interrogatory on the grounds
25 that it is overbroad, burdensome and oppressive. The
26 interrogatory requests detailed information not reasonably
27 calculated to lead to the discovery of admissible evidence and
28 which falls outside the scope of this litigation.

1 Notwithstanding these objections, Rockbestos responds:

2
3 Currently unknown, but investigation is continuing.

4
5 Response to Interrogatory No. 15:

6
7 See Preliminary Statement and General Objections.
8 Rockbestos further objects to this interrogatory on the grounds
9 that it is overbroad, burdensome and oppressive. The
10 interrogatory requests detailed information not reasonably
11 calculated to lead to the discovery of admissible evidence and
12 which falls outside the scope of this litigation.

13 Notwithstanding these objections, Rockbestos responds:

14
15 285 Nicoll Street
16 New Haven, Connecticut 06504

17
18 Response to Interrogatory No. 16:

19
20 See Preliminary Statement and General Objections.
21 Rockbestos further objects to this interrogatory on the grounds
22 that it is overbroad, burdensome and oppressive. The
23 interrogatory requests detailed information not reasonably
24 calculated to lead to the discovery of admissible evidence and
25 which falls outside the scope of this litigation.

26 Notwithstanding these objections, Rockbestos responds:

27
28 a. Approximately 1920;

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1 b. They continue to operate today;

2 c. Refer to Response to Interrogatory No. 8.

3
4 Response to Interrogatory No. 17:

5
6 See Preliminary Statement and General Objections.
7 Rockbestos further objects to this interrogatory on the grounds
8 that it is overbroad, burdensome and oppressive. The
9 interrogatory requests detailed information not reasonably
10 calculated to lead to the discovery of admissible evidence and
11 which falls outside the scope of this litigation.
12 Notwithstanding these objections, Rockbestos responds:

13
14 Currently unknown, but investigation is continuing.

15
16 Response to Interrogatory No. 18:

17
18 See Preliminary Statement and General Objections.
19 Rockbestos further objects to this interrogatory on the grounds
20 that it is overbroad, burdensome and oppressive. The
21 interrogatory requests detailed information not reasonably
22 calculated to lead to the discovery of admissible evidence and
23 which falls outside the scope of this litigation.
24 Notwithstanding these objections, Rockbestos responds:

25
26 a. - g. February 7, 1967; Patent # 3,303,270
27
28

Response to Interrogatory No. 19:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. In addition, this information is equally available to plaintiffs by inquiry to the United States Patent and Trademark Office in Washington, D.C. Notwithstanding these objections, Rockbestos responds:

Refer to Response to Interrogatory No. 8 for trademark names. Other information is currently unknown, but investigation is continuing.

Response to Interrogatory No. 20:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Notwithstanding these objections, Rockbestos responds:

No.

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Response to Interrogatory No. 21:

See Preliminary Statement and General Objections.
Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Notwithstanding these objections, Rockbestos responds:

Currently unknown, but investigation is continuing.

Response to Interrogatory No. 22:

See Preliminary Statement and General Objections.
Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Notwithstanding these objections, Rockbestos responds:

a. A compilation of sales data for the period 1981 to 1985 is maintained by Rockbestos. Pre-1980 sales records and data for California are not in existence with the exception of some records reflecting sales of wire and cable products, some of which contained encapsulated and saturated asbestos, to nuclear power plants;

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1 b. The Rockbestos Company, 285 Nicoll Street, New
2 Haven Connecticut, 06504;

3
4 c. Edward Randall.

5
6 Response to Interrogatory No. 23:

7
8 See Preliminary Statement and General Objections.
9 Rockbestos further objects to this interrogatory on the grounds
10 that it is overbroad, burdensome and oppressive. The
11 interrogatory requests detailed information not reasonably
12 calculated to lead to the discovery of admissible evidence and
13 which falls outside the scope of this litigation.
14 Notwithstanding these objections, Rockbestos responds:

15
16 Numerous uncatalogued documents responsive to this
17 request are maintained at The Rockbestos Company, 285 Nicoll
18 Street, New Haven, Connecticut 06504 and arrangements may be made
19 to inspect these documents at that location.

20
21 Response to Interrogatory No. 24:

22
23 See Preliminary Statement and General Objections.
24 Rockbestos further objects to this interrogatory on the grounds
25 that it is overbroad, burdensome and oppressive. The
26 interrogatory requests detailed information not reasonably
27 calculated to lead to the discovery of admissible evidence and
28 which falls outside the scope of this litigation.

1 Notwithstanding these objections, Rockbestos responds:

2
3 Numerous uncatalogued documents responsive to this
4 request are maintained at The Rockbestos Company, 285 Nicoll
5 Street, New Haven, Connecticut 06504 and arrangements may be made
6 to inspect these documents at that location.

7
8 Response to Interrogatory No. 25:

9
10 See Preliminary Statement and General Objections.
11 Rockbestos further objects to this interrogatory on the grounds
12 that it is overbroad, burdensome and oppressive. The
13 interrogatory requests detailed information not reasonably
14 calculated to lead to the discovery of admissible evidence and
15 which falls outside the scope of this litigation.

16 Notwithstanding these objections, Rockbestos responds:

17
18 a. The Rockbestos Company, 285 Nicoll Street, New
19 Haven, Connecticut, 06504;

20 b. Edward Randall.

21
22 Response to Interrogatory No. 26:

23
24 See Preliminary Statement and General Objections.
25 Rockbestos further objects to this interrogatory on the grounds
26 that it is overbroad, burdensome and oppressive. The
27 interrogatory requests detailed information not reasonably
28 calculated to lead to the discovery of admissible evidence and

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1 which falls outside the scope of this litigation.

2 Notwithstanding these objections, Rockbestos responds:

3
4 Not applicable.

5
6 Response to Interrogatory No. 27:

7
8 See Preliminary Statement and General Objections.
9 Rockbestos further objects to this interrogatory on the grounds
10 that it is overbroad, burdensome and oppressive. The
11 interrogatory requests detailed information not reasonably
12 calculated to lead to the discovery of admissible evidence and
13 which falls outside the scope of this litigation.

14 Notwithstanding these objections, Rockbestos responds:

15
16 Not applicable.

17
18 Response to Interrogatory No. 28:

19
20 See Preliminary Statement and General Objections. The
21 interrogatory requests detailed information not reasonably
22 calculated to lead to the discovery of admissible evidence and
23 which falls outside the scope of this litigation. In addition,
24 the information sought is so burdensome to ascertain as to be
25 unjust, harassing, annoying and oppressive because it relates to
26 numerous products manufactured during a 61 year period and is not
27 limited to products allegedly used by plaintiff/plaintiff's
28 decedent or allegedly sold and/or supplied to

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1 plaintiff's/plaintiff's decedent's employer during the period of
2 plaintiff's/plaintiff's decedent's employment. Notwithstanding
3 these objections, Rockbestos responds:
4

5 Rockbestos is without sufficient information to
6 describe each package or container which contained products sold
7 and/or distributed by Rockbestos. Over the years the containers
8 consisted of boxes, spools, or reels in various materials,
9 dimensions, shapes and colors which were marked or tagged with
10 the names Cerro or Rockbestos, or the brand or trade names
11 previously identified.
12

13 Plaintiff has not established that
14 plaintiff/plaintiff's decedent utilized any product manufactured
15 by Rockbestos. Rockbestos will attempt to provide all known,
16 pertinent information for products identified by
17 plaintiff/plaintiff's decedent.
18

19 Response to Interrogatory No. 29:
20

21 See Preliminary Statement and General Objections. The
22 interrogatory requests detailed information not reasonably
23 calculated to lead to the discovery of admissible evidence and
24 which falls outside the scope of this litigation. In addition,
25 the information sought is so burdensome to ascertain as to be
26 unjust, harassing, annoying and oppressive because it relates to
27 numerous products manufactured during a 61 year period and is not
28 limited to products allegedly used by plaintiff/plaintiff's

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1 decedent or allegedly sold and/or supplied to
2 plaintiff's/plaintiff's decedent's employer during the period of
3 plaintiff's/plaintiff's decedent's employment. Notwithstanding
4 these objections, Rockbestos responds:

5
6 Rockbestos is without sufficient information to
7 describe each product's logo, design, marking or printing.
8 During the defined time period packaging or containers for
9 Rockbestos products, some of which contained encapsulated and
10 saturated asbestos, included boxes, spools, or reels which were
11 marked or tagged with the names Cerro or Rockbestos, the brand or
12 trade names Firezone, Firewall, Rocktherm, Pyrotrol, Phosroc,
13 Cryozone or H-zone, an hourglass within a circle or other
14 distinctive markings.

15
16 Plaintiff has not established that
17 plaintiff/plaintiff's decedent utilized any product manufactured
18 by Rockbestos. Rockbestos will attempt to provide all known,
19 pertinent information for products identified by
20 plaintiff/plaintiff's decedent.

21
22 Response to Interrogatory No. 30:
23

24 See Preliminary Statement and General Objections.
25 Rockbestos further objects to this interrogatory on the grounds
26 that it is overbroad, burdensome and oppressive. The
27 interrogatory requests detailed information not reasonably
28 calculated to lead to the discovery of admissible evidence and

1 which falls outside the scope of this litigation.

2 Notwithstanding these objections, Rockbestos responds:

3
4 a. - b. Examples of packaging or containers
5 substantially similar to those utilized by Rockbestos during the
6 defined time period may be inspected at the Rockbestos Company,
7 285 Nicoll Street, New Haven Connecticut 06504;

8
9 c. Edward Randall.

10
11 Response to Interrogatory No. 31:

12
13 See Preliminary Statement and General Objections.
14 Rockbestos further objects to this interrogatory on the grounds
15 that it is overbroad, burdensome and oppressive. The
16 interrogatory requests detailed information not reasonably
17 calculated to lead to the discovery of admissible evidence and
18 which falls outside the scope of this litigation.

19 Notwithstanding these objections, Rockbestos responds:

20
21 Not applicable.

22
23 Response to Interrogatory No. 32:

24
25 See Preliminary Statement and General Objections.
26 Rockbestos further objects to this interrogatory on the grounds
27 that it is overbroad, burdensome and oppressive. The
28 interrogatory requests detailed information not reasonably

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1 calculated to lead to the discovery of admissible evidence and
2 which falls outside the scope of this litigation. This
3 interrogatory incorrectly assumes that wire and cable products,
4 with insulation containing encapsulated and saturated asbestos,
5 were hazardous. Notwithstanding these objections, Rockbestos
6 responds:

7
8 a. - c. A warning was included between 1979 and 1986.
9 Refer to Exhibit 1; Between 1979 and 1986 a warning was included
10 on all boxes, spools or reels of cable and wire products
11 containing insulation with encapsulated and saturated asbestos.

12
13 Response to Interrogatory No. 33:

14
15 See Preliminary Statement and General Objections.
16 Rockbestos further objects to this interrogatory on the grounds
17 that it is overbroad, burdensome and oppressive. The
18 interrogatory requests detailed information not reasonably
19 calculated to lead to the discovery of admissible evidence and
20 which falls outside the scope of this litigation. In addition,
21 this interrogatory incorrectly assumes that wire and cable
22 products, with insulation containing encapsulated and saturated
23 asbestos, were hazardous. Notwithstanding these objections,
24 Rockbestos responds:

25
26 No such brochures or pamphlets relating to Rockbestos
27 products were distributed.
28

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1 Response to Interrogatory No. 34:

2
3 See Preliminary Statement and General Objections.
4 Rockbestos further objects to this interrogatory on the grounds
5 that it is overbroad, burdensome and oppressive. The
6 interrogatory requests detailed information not reasonably
7 calculated to lead to the discovery of admissible evidence and
8 which falls outside the scope of this litigation.
9 Notwithstanding these objections, Rockbestos responds:

10
11 Rockbestos has never had contract units. Refer to
12 Response to Interrogatory No. 32, a. - c. relating to warnings.

13 Response to Interrogatory No. 35:

14
15 See Preliminary Statement and General Objections.
16 Rockbestos further objects to this interrogatory on the grounds
17 that it is overbroad, burdensome and oppressive. The
18 interrogatory requests detailed information not reasonably
19 calculated to lead to the discovery of admissible evidence and
20 which falls outside the scope of this litigation. Notwithstanding
21 these objections, Rockbestos responds:
22

23
24 Not as far as is currently known, but investigation is
25 continuing.
26
27
28

1 Response to Interrogatory No. 36:

2
3 See Preliminary Statement and General Objections.

4 Rockbestos further objects to this interrogatory on the grounds
5 that it is overbroad, burdensome and oppressive. The
6 interrogatory requests detailed information not reasonably
7 calculated to lead to the discovery of admissible evidence and
8 which falls outside the scope of this litigation.
9 Notwithstanding these objections, Rockbestos responds:

10
11 None.

12
13 Response to Interrogatory No. 37:

14
15 See Preliminary Statement and General Objections.

16 Rockbestos further objects to this interrogatory on the grounds
17 that it is overbroad, burdensome and oppressive. The
18 interrogatory requests detailed information not reasonably
19 calculated to lead to the discovery of admissible evidence and
20 which falls outside the scope of this litigation.
21 Notwithstanding these objections, Rockbestos responds:

22
23 (i) b. IHF 1987 to currently unknown.

24 h. AIA 1979 to 1982.

25
26 Response to Interrogatory No. 38:

27
28 See Preliminary Statement and General Objections.

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1 Rockbestos further objects to this interrogatory on the grounds
2 that it is overbroad, burdensome and oppressive. The
3 interrogatory requests detailed information not reasonably
4 calculated to lead to the discovery of admissible evidence and
5 which falls outside the scope of this litigation.

6 Notwithstanding these objections, Rockbestos responds:

7
8 a. Refer to Response to Interrogatory No. 37;

9
10 b. - c. Currently unknown, but investigation is
11 continuing.

12
13 Response to Interrogatory No. 39:

14
15 See Preliminary Statement and General Objections.

16 Rockbestos further objects to this interrogatory on the grounds
17 that it is overbroad, burdensome and oppressive. The
18 interrogatory requests detailed information not reasonably
19 calculated to lead to the discovery of admissible evidence and
20 which falls outside the scope of this litigation.

21 Notwithstanding these objections, Rockbestos responds:

22
23 No such documents were received by Rockbestos on or
24 near the dates of their dissemination by the Saranac Laboratory
25 at the Trudeau Foundation.

26
27 a. Not applicable;
28

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(415) 832 9134

1 b. - c. Currently unknown, but investigation is
2 continuing;

3
4 Response to Interrogatory No. 40:

5
6 See Preliminary Statement and General Objections.
7 Rockbestos further objects to this interrogatory on the grounds
8 that it is overbroad, burdensome and oppressive. The
9 interrogatory requests detailed information not reasonably
10 calculated to lead to the discovery of admissible evidence and
11 which falls outside the scope of this litigation.
12 Notwithstanding these objections, Rockbestos responds:

13
14 No.

15
16 Response to Interrogatory No. 41:

17
18 See Preliminary Statement and General Objections.
19 Rockbestos further objects to this interrogatory on the grounds
20 that it is overbroad, burdensome and oppressive. The
21 interrogatory requests detailed information not reasonably
22 calculated to lead to the discovery of admissible evidence and
23 which falls outside the scope of this litigation.
24 Notwithstanding these objections, Rockbestos responds:

25
26 No.

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Response to Interrogatory No. 42:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 43:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Response to Interrogatory No. 44:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and

1 which falls outside the scope of this litigation.

2 Notwithstanding these objections, Rockbestos responds:

3
4 No.

5
6 Response to Interrogatory No. 45:

7
8 See Preliminary Statement and General Objections.
9 Rockbestos further objects to this interrogatory on the grounds
10 that it is overbroad, burdensome and oppressive. The
11 interrogatory requests detailed information not reasonably
12 calculated to lead to the discovery of admissible evidence, is
13 violative of the critical self-evaluation privilege and which
14 falls outside the scope of this litigation.

15
16 Response to Interrogatory No. 47:

17
18 See Preliminary Statement and General Objections.
19 Rockbestos further objects to this interrogatory on the grounds
20 that it is overbroad, burdensome and oppressive. The
21 interrogatory requests detailed information not reasonably
22 calculated to lead to the discovery of admissible evidence and
23 which falls outside the scope of this litigation.

24 Notwithstanding these objections, Rockbestos responds:

25
26 Refer to Response to Interrogatory No. 32, a. - c.
27
28

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Response to Interrogatory No. 48:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 49:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 50:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds

1 that it is overbroad, burdensome and oppressive. The
2 interrogatory requests detailed information not reasonably
3 calculated to lead to the discovery of admissible evidence and
4 which falls outside the scope of this litigation.

5 Notwithstanding these objections, Rockbestos responds:

6
7 Rockbestos has received numerous written communications
8 relating to lawsuits in which such allegations have purportedly
9 been made.

10
11 Rockbestos is currently unable to identify the first
12 such written communication, but investigation is continuing.

13
14 Response to Interrogatory No. 51:

15
16 See Preliminary Statement and General Objections.
17 Rockbestos further objects to this interrogatory on the grounds
18 that it is overbroad, burdensome and oppressive. The
19 interrogatory requests detailed information not reasonably
20 calculated to lead to the discovery of admissible evidence and
21 which falls outside the scope of this litigation.
22 Notwithstanding these objections, Rockbestos responds:

23
24 Yes

25
26 a. - f. Currently unknown, but investigation is
27 continuing.
28

Response to Interrogatory No. 52:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

Yes.

a. - f. Currently unknown, but investigation is continuing.

Response to Interrogatory No. 53:

See Preliminary Statement and General Objections.

Rockbestos further objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

1 Rockbestos contends it had general liability coverage
2 for the relevant time periods; the extent and application of
3 insurance coverage is currently disputed.

4
5 1930 - 1943, unknown;
6 1943 - 1959, Travelers;
7 1959 - 1976, Liberty Mutual;
8 1/1/76 - 9/1/76, Home;
9 9/1/76- Present, Self insured.

10
11 Response to Interrogatory No. 54:

12
13 See Preliminary Statement and General Objections.
14 Rockbestos further objects to this interrogatory on the grounds
15 that it is overbroad, burdensome and oppressive. The
16 interrogatory requests detailed information not reasonably
17 calculated to lead to the discovery of admissible evidence and
18 which falls outside the scope of this litigation.
19 Notwithstanding these objections, Rockbestos responds:

20
21 No.

22
23 Response to Interrogatory No. 55:

24
25 See Preliminary Statement and General Objections.
26 Rockbestos further objects to this interrogatory on the grounds
27 that it is overbroad, burdensome and oppressive. The
28 interrogatory requests detailed information not reasonably

1 calculated to lead to the discovery of admissible evidence and
2 which falls outside the scope of this litigation.

3 Notwithstanding these objections, Rockbestos responds:

4
5 No.

6
7 Response to Interrogatory No. 56:

8
9 See Preliminary Statement and General Objections.
10 Rockbestos further objects to this interrogatory on the grounds
11 that it is overbroad, burdensome and oppressive. The
12 interrogatory requests detailed information not reasonably
13 calculated to lead to the discovery of admissible evidence and
14 which falls outside the scope of this litigation.
15 Notwithstanding these objections, Rockbestos responds:

16
17 No.

18
19 Response to Interrogatory No. 57:

20
21 See Preliminary Statement and General Objections.
22 Rockbestos further objects to this interrogatory on the grounds
23 that it is overbroad, burdensome and oppressive. The
24 interrogatory requests detailed information not reasonably
25 calculated to lead to the discovery of admissible evidence and
26 which falls outside the scope of this litigation.

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Notwithstanding these objections, Rockbestos responds:

No.

DATED: May 20, 1991

BJORK, FLEER & LAWRENCE

By: Dorine R. Kohn

Dorine R. Kohn
Attorneys for Defendant
The Rockbestos Company

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CAUTION

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AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY
CAUSE SERIOUS BODILY HARM

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VERIFICATION

I, George G. Littlehales, am the Quality Assurance Manager for The Rockbestos Company, a party in the above-entitled action, and as such am authorized to make the following verification. I have read the foregoing RESPONSES TO GENERAL ORDER NO. 30.00 STANDARD PLAINTIFFS' INTERROGATORIES and know the contents thereof. No single official, employee, or former employee of The Rockbestos Company has personal knowledge of all such matters. The information contained herein has been compiled at my direction by counsel for The Rockbestos Company. I am informed and believe all the responses are true and verify the responses on that basis.

I declare under penalty of perjury under the laws of the State of California that the foregoing Answers are true and correct, insofar as it is possible to verify them.

Executed this 20th day of May, 1991, at New Haven, Connecticut.

By: George Littlehales

George Littlehales

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

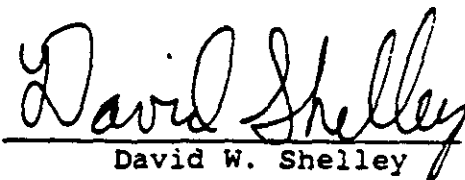
3 I am a citizen of the United States and a resident of
4 Alameda County. I am over the age of eighteen years and not a
5 party to the within action; my business address is 483 Ninth
6 Street, Oakland, California 94607.
7

8 On the date below, I served this The Rockbestos
9 company's Responses To General Order 30.00 Interrogatories by
10 placing a true copy thereof enclosed in a sealed envelope with
11 postage thereon fully prepaid, in the United States mail at
12 Oakland, Alameda County, California, addressed as follows:
13

14 SEE ATTACHED LIST(S)
15

16 I declare under penalty of perjury that the above is
17 true and correct.
18

19 Executed at Oakland, California on May 24, 1991.
20

21
22 
23
24 David W. Shelley
25
26
27
28

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IN RE COMPLEX ASBESTOS LITIGATION - ALAMEDA COUNTY

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