

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

**DEFENDANT, CRANE CO.'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' MASTER SET OF INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

TO: PLAINTIFFS by and through their attorney of record, Brent Coon & Associates, 917 Franklin, Suite 210, Houston, Texas 77002; Baron & Budd, 3102 Oak Lawn Ave., Suite 1100, Dallas, TX 75219-4201; Law Offices of Robert Kientz, 600 Congress, Suite 1330, Austin, TX 78701; Waters & Kraus, 3219 McKinney Ave., Suite 300, Dallas, TX 75204; Kaeske Law Firm, 6301 Gaston Ave., Suite 735, Dallas, TX 75214; Jackson Crane Law Firm, 4245 North Central Expressway, Suite 600, Dallas, TX 75205

Defendant Crane Co. hereby serves its Objections and Responses to Plaintiffs' Master Set of Interrogatories and Request for Production of Documents to Defendants to Defendants.

Respectfully Submitted,

DUNN, KACAL, ADAMS, PAPPAS & LAW, P.C.

BY: _____

Robert L. Adams SBOT# 00878000
One Riverway, Suite 1200
Houston, Texas 77056
713/529-3992; 713/529-1416

**ATTORNEYS FOR DEFENDANT,
CRANE CO.**

**PLAINTIFF'S EXHIBIT
WK CC 5061**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Crane Co.'s Objections and Responses to Plaintiffs' Master Set of Interrogatories and Request for Production Propounded to Defendants was served on Plaintiffs' counsel via first class mail this the 4th day of February, 2003.

ROBERT L. ADAMS

**PRELIMINARY STATEMENT/GENERAL OBJECTIONS/
RESERVATION OF RIGHTS**

A. The following responses are based upon the information that is presently known and reasonably available to Crane Co. Crane Co. believes these responses are accurate as of the date made. Many matters inquired about in Plaintiffs' Master Set of Interrogatories and Request for Production of Documents to Defendants. ("Discovery Requests") took place decades ago. Due to the passage of time, information may be incomplete or no longer available. Moreover, information sought in the Discovery Requests may be contained in documents housed in various document repositories. Due to the time and expense involved, it would not be practical to review all of those documents in connection with preparing responses to the Discovery Requests. Nevertheless, Crane Co. has endeavored to investigate all relevant facts and circumstances. The following answers are based upon its investigation. Crane Co. cannot exclude the possibility that its continued investigation may reveal more complete information. Crane Co.'s investigation into the matters inquired into in these Discovery Requests continues. The investigation is dependent upon locating knowledgeable individuals and relevant documents. No finite completion date can be placed upon those efforts. Crane Co. has made a reasonable effort to answer these Discovery Requests to the best of its present knowledge, information, and belief.

B. Crane Co. objects to the Discovery Requests to the extent they (1) are unduly burdensome and overbroad, or (2) seek information that is not relevant to this lawsuit and that is not reasonably calculated to lead to the discovery of admissible evidence. Information not presently known to or readily ascertainable by Crane Co. may be located in various document repositories Crane Co. maintains. Crane Co. has not reviewed the documents stored at those locations, because the expense involved with such an effort would be prohibitive and unduly burdensome. The documents located at the repositories are not organized; and Crane Co. is not

able to ascertain whether any documents located within the repositories contain information responsive to the Discovery Requests. The repositories, however, contain numerous documents that are not responsive to the Discovery Requests and which, Crane Co. presumes, may be protected by the attorney-client privilege, the work product doctrine, and/or other applicable privileges and/or protections. Should plaintiffs wish to review the documents located at any of the repositories, Crane Co. will make certain of those documents available to plaintiffs if plaintiffs agree, in writing, that (i) Crane Co. has not waived any objections it may have with respect to the discoverability of those documents on any ground, all of which objections are expressly reserved, and (ii) Crane Co. may conduct a post-designation review to remove privileged and irrelevant documents from any collection of documents that may be copied for production to plaintiffs, even if plaintiffs had specifically designated the privileged or irrelevant documents for copying. The burden of obtaining responsive information from those documents is the same for plaintiffs as it is for Crane Co.

C. Crane Co. does not concede that any of its answers to the Discovery Requests are or will be admissible evidence at a trial of this action. Crane Co. does not waive any objection on any ground, whether or not asserted herein, to the use of any such answer at trial.

D. Crane Co. objects to the definitions contained in the Discovery Requests to the extent they render the Requests vague, overbroad, and unduly burdensome. In responding to the Discovery Requests, Crane Co. will use the commonly understood, everyday meanings of the terms used. The breadth and volume of the definitions plaintiffs seek to propound would complicate tremendously the task of responding to the Discovery Requests.

E. The foregoing Preliminary Statement and General Objections are incorporated by reference into each of the responses provided hereinafter.

I. INTERROGATORIES

INTERROGATORY NO. 1:

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

ANSWER: Crane Co.'s answers to these Interrogatories were prepared by Crane Co.'s litigation counsel and are based upon review of numerous documents and interviews with past and present employees.

INTERROGATORY NO. 2:

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

ANSWER: Crane Co. is a corporation that was originally incorporated in Illinois in or about 1865. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters are located at 100 First Stamford Place, Stamford, Connecticut 06902.

Crane Co. is authorized to do business in the State of Texas. Its agent for service is CT Corporation, 350 North St. Paul Street, Dallas, Texas 75201.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location

of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in asbestos litigation.

ANSWER: Subject to and without waiving the foregoing General Objections, to the best of Crane Co.'s present knowledge, no.

INTERROGATORY NO. 4:

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

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action, and because it is overly broad and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Crane Co.'s response to this Interrogatory shall not be construed as an admission that Crane Co. was involved in any activity with respect to asbestos-containing products that are relevant in any way to this lawsuit.

Subject to and without waiving the foregoing objections, Crane Co. was not a manufacturer of any asbestos-containing product, as that term is commonly used in asbestos litigation. Crane Co. is and has been a manufacturer of certain types of industrial equipment. Crane Co.'s principal line of industrial equipment has been industrial valves. Industrial valves manufactured by Crane Co. were made of steel, bronze, and other metals; the valves themselves were not composed of asbestos. Many of those valves bore the name "Crane," marked directly on the valve. Certain of the valves had enclosed within their metal structure asbestos-containing gaskets, packing, or discs. Crane Co. did not

manufacture the asbestos-containing components that may have been encapsulated within the valves, but purchased them from other companies. Any components that may have been enclosed within the metal structure of Crane Co. valves did not emit friable or respirable asbestos fibers while enclosed within that structure. Any asbestos-containing components were completely encapsulated within the metal structure of the valves. Furthermore, any asbestos contained in the components themselves was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. acquired around and subsequent to 1961 the assets of several industrial pump companies that became divisions of Crane Co. Subsequent to those acquisitions, Crane Co. manufactured industrial pumps that may have incorporated within their metal structure an encapsulated asbestos-containing gasket and/or asbestos-containing packing. Crane Co. did not, however, manufacture the asbestos-containing components, such as gaskets or packing, contained in the industrial pumps. It purchased those components from other companies. Any components that may have contained asbestos were enclosed within the metal structure of Crane Co. industrial pumps and did not emit friable or respirable asbestos fibers while enclosed within that structure. Furthermore, any asbestos contained in the components themselves was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. manufactured boilers in the late 1800s, a practice which it appears to have discontinued prior to 1900. Crane Co. resumed manufacturing boilers in or about 1931, suspended those operations during World War II, and discontinued that practice in the 1950s. At least some of the boilers Crane Co. manufactured through, at least, the early 1940s contained asbestos insulation. For a brief period of time after it ceased

manufacturing boilers, Crane Co. sold boilers that were manufactured, at least in part, by another company. In the 1960s, Crane Co. purchased the assets of two boiler companies, which it resold a few years later. To the best of Crane Co.'s knowledge, however, the boilers, water heaters, and furnaces that Crane Co. manufactured with those acquired assets contained fiberglass, not asbestos, insulation. After it sold those assets, Crane Co. may have sold boilers, water heaters, and furnaces that it purchased from other entities. It is believed, however, that those items contained fiberglass, not asbestos, insulation.

For a period of time believed to be less than two years during the early 1960s, Crane Co., through its division, Crane-Midwest Piping, was involved with the erection of piping systems in limited geographic areas. In connection with that erection business, Crane Co. is presently aware of one project to which Crane Co. sent flat gaskets that, most likely, contained some asbestos as part of their chemical and physical composition.

Crane Co., through a division, sold industrial water treatment systems, including deaerators, water conditioners, multi-port steam relief valves, drainers, sample coolers, and condensate boosters. Those products were composed primarily of metal; they were not composed of asbestos. Depending on the application for which it was to be used, some of this equipment incorporated internal components, primarily cloth gaskets, manufactured by others, that may have contained some asbestos as part of their chemical composition. Those components were enclosed within the equipment and were not exposed during installation or normal use of the product. Prior to the mid 1980s, Crane Co. may have sold replacement gaskets for use in the industrial water treatment systems. To the best of Crane Co.'s knowledge, Crane Co. did not manufacture any of the internal components, but purchased them from other companies.

Crane Co. also offered for sale certain products manufactured by other companies. A small quantity of those products may have contained asbestos. Crane Co. offered for sale gaskets, packing, and discs manufactured by other companies that may have contained asbestos. Material called Cranite was manufactured exclusively for resale by Crane Co., during the relevant time period through what appears to be the early-to-mid 1970s, but perhaps extending to the early 1980s. The finished "Cranite" products had the name "Cranite" stamped directly upon them. Any asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of any friable asbestos fibers. In addition, Crane Co. offered for sale products manufactured by others at many of its branch locations. Some of these products contained asbestos. Most of those products are listed in Crane Co. catalogs, which will be made available to plaintiffs at a mutually agreeable time and place. See also Preliminary Statement, § B.

INTERROGATORY NO. 5:

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

- (a) As to each product, state whether such product was mined, manufactured, marketed, distributed, installed, and/or sold;
- (b) The names of the companies mining, manufacturing, marketing, distributing installing, and/or selling each product mined, manufactured, marketed, distributed, installed and/or sold;
- (c) The trade or brand name of each of those products mined, manufactured, marketed, distributed, installed, and/or sold;
- (d) The date each of the named products was placed on the market;

- (e) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product;
- (f) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor;
- (g) The date asbestos was removed from such products, if ever, and the reasons therefor;
- (h) A description of the physical appearance of each of the named products;
- (i) A detailed description of the intended uses of the named products; and
- (j) Identify the last year that you sold each asbestos-containing product.

ANSWER: Crane Co. objects to this Interrogatory, because (i) it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence; (ii) it is not in any way limited to the alleged exposure of the plaintiff in this actions, and (iii) it is unduly burdensome because of the multitude of different types of industrial equipment and components that are discussed in response to Interrogatory No.4.

Subject to and without waiving the foregoing objections, Crane Co. believes that information responsive to this Interrogatory can be derived from Crane Co.'s annual reports. Crane Co. is willing to make its annual reports for the years 1960 through the present available to plaintiffs upon request. The burden of deriving responsive information from these reports is the same for plaintiff as it is for Crane Co.

By way of further answer, see Crane Co.'s Response to Interrogatory No. 4. Crane Co. placed on the market industrial valves that may have contained asbestos-containing materials within their metal structure as early as 1858. Asbestos was removed as a component from Crane Co.'s industrial valves in the mid-1980's, with the exception of one specific type of valve designed for petroleum industry applications, which incorporated an

asbestos component until the early 1990's. In all cases, asbestos was eliminated as a component of Crane Co. products because of decreased consumer demand for products that incorporated asbestos and/or Crane Co.'s inability to obtain asbestos-containing components. Except for Cranite "sheet packing", Crane Co. cannot state the amount of asbestos that may have been a component of any of its products, because, inter alia, the asbestos-containing components were manufactured by others. Cranite "sheet packing" was comprised of 75%-85% chrysotile asbestos, the balance consisting of a natural rubber binder and inert fillers. Cranite "sheet packing" was sold in sheet and pre-cut gasket form. Crane Co. sold Cranite sheet packing from approximately 1920 until, to the best of its belief, 1972. To the best of Crane Co.'s knowledge, the product was never manufactured without asbestos.

INTERROGATORY NO. 6:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products identified in your answers to these Interrogatories still exist? If so, state:

- (a) A description of each such document;
- (b) The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, other companies manufactured, designed,

prepared and introduced into the market the asbestos-containing component parts identified in Crane Co.'s response to Interrogatory No. 4. By way of further answer, to the extent relevant, to its knowledge, Crane Co. presently possesses drawings and technical specification data relating to various items of industrial equipment. Crane Co. further possesses technical specifications for Cranite "sheet packing". See also Preliminary Statement, § B.

INTERROGATORY NO. 7:

Before distributing, selling, or placing the products identified in your answers to these Interrogatories into the stream of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials; such as asbestos, contained in those products? If the answer is affirmative, state:

- (a) The names of the products tested and the date; of each test;
- (b) The name, address, and job title of each person conducting the tests or involved with conducting the tests; and
- (c) The results of the tests.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and (ii) that there were any health hazards involved with Crane Co.'s products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful

when used as intended, and therefore Crane Co. did not conduct any tests regarding any potential health hazards associated with asbestos.

INTERROGATORY NO. 8:

Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products identified in your answers to these Interrogatories now exist? If so, state:

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

ANSWER: See objections and response to Interrogatory No. 7.

INTERROGATORY NO. 9:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests identified in your answers to these Interrogatories? If the answer is affirmative, state:

- (a) The trade names of the products changed;
- (b) The nectars of the changes made and the date of such changes or modifications;
- (c) The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER: See objections and response to Interrogatory No. 7.

INTERROGATORY NO. 10:

After releasing the products identified in your answers to these Interrogatories to the public, were any tests conducted on them to determine potential health hazards resulting from the

use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- (a) The names of the products tested and the dates of such tests;
- (b) The name, address, and job title of each person who conducted those tests;
- (c) The results of those tests;
- (d) Whether, as a result of the tests, any products were removed from the market;
- (e) The names of all products removed from the market as a result of these tests.

ANSWER: Crane Co. objects to the phrase "releasing the products" as it is used in this Interrogatory. Crane Co.'s products were sold primarily to industrial customers, who were sophisticated users of those products. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and (ii) that there were any health hazards involved with Crane Co.'s products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful when used as intended, and therefore, Crane Co. did not conduct any tests regarding any potential health hazards associated with asbestos.

INTERROGATORY NO. 11:

Do any documents, including, but not limited to, written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products identified in your answers to these Interrogatories now exist? If so, state:

- (a) The name of each product;
- (b) A description of each document and how it relates to each product; and
- (c) The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and (ii) that there were any health hazards involved with Crane Co.'s products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful when used as intended, and therefore, Crane Co. is not presently aware of any such documents requested by this Interrogatory. See Preliminary Statement, Section B.

INTERROGATORY NO. 12:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests identified in your answers to these Interrogatories? If the answer is affirmative, state:

- (a) The name of the products changed or modified;
- (b) The name, address, and job title of each person responsible for having made a change or modification;
- (c) The nature of the hazard or defect which resulted in such change or modification.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies (i)

that Crane Co. manufactured any asbestos-containing products and (ii) that there were any health hazards involved with Crane Co.'s products. Subject to and without waiving the foregoing objections, Crane Co. did not ever believe that any product it sold was harmful when used as intended, and therefore, Crane Co. did not conduct any tests regarding any potential health hazards associated with asbestos. Accordingly, Crane Co. has no information responsive to this Interrogatory.

INTERROGATORY NO. 13:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets catalogs packaging or other written material of any kind or character containing any warnings concerning the possibility of injury resulting; from the use of the asbestos-containing products identified in your answers to these Interrogatories? If so, state;

- (a) The names of each relevant product;
- (b) The exact wording of each warning statement on each printed material;
- (c) A description of the printed material other than the warning statement;
- (d) The method used to distribute the warning to persons likely to use the product;
- (e) The date each warning was first issued, distributed, or placed on packaging;
- (f) The name, address and job title of each person responsible for having drafted or issued the warning;
- (g) The current location or any such printed material and the custodian thereof;
- (h) The form in which such literature or printed materials can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Crane Co. further objects to this Interrogatory as being ambiguous, overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, the only "warning" associated with any Crane Co. industrial product regarding asbestos was a notification which first appeared in the mid-1980s, attached to certain industrial valves that informed the user that asbestos-containing materials were contained within the valve. That warning read as follows: "CAUTION – Contains Asbestos Packing or Gasket". See Preliminary Statement, §B.

INTERROGATORY NO. 14:

Before 1970, had you received notice that any individual or individuals claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;
- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney who represents each individual making a claim;
- (f) The style and court number of each claim;
- (g) The disposition of each claim that has been settled or taken to judgment.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome, overbroad and seeks information that is not relevant to this action and it is

not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, §B.

INTERROGATORY NO. 15:

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome, in that it is not limited as to time or geographical area, and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. sold products through its own branches as well as through third-party distributors, although it is not presently aware of the identities of all of those entities.

INTERROGATORY NO. 16:

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

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome and overbroad, in that it is not limited in time, and seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waving the foregoing objections, Crane Co. maintained branch houses at the following locations during some portion of the time at which it supplied at least some of the products referenced in its response to Interrogatory No. 4. With respect to the products sold from the branches listed below, Crane Co. has some invoices available from certain branches that it will produce to plaintiffs at a mutually agreeable time and place. The burden of obtaining responsive information from those documents is the same for plaintiffs as it is for Crane Co.

720 Fannin St., Beaumont, TX;
1212 North Toncahau St., Corpus Christi, TX;
814 Young St., Dallas, TX;
1609 Texas St., El Paso, TX;
201 West C St., Harlingen, TX;
2204 Pease Ave., Houston, TX;
1200 East Houston St., San Antonio, TX;

Beginning in or around the last 1950s and ending in 1987, Crane Co. began closing or selling its supply branch locations in the United States. The Dallas branch was closed in 1978. The San Antonio branch was sold in 1979. The Houston branch was sold in 1987. Crane Co. believes that the remainder of the above mentioned branches were closed or sold prior to the early 1970s. See Preliminary Statement, § B.

INTERROGATORY NO. 17:

List each employee who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists,

and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it does not know of any physician or industrial hygienist that Crane Co. employed with respect to asbestos issues, outside those retained in connection with the asbestos litigation. See Preliminary Statement §, B.

INTERROGATORY NO. 18:

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

- (a) The name of each such publication;
- (b) The date of publication and the names of the author and publisher (if any);
- (c) The date received by Defendant, if known; and
- (d) The name, job title, and address: of each person who currently has possession of each publication and its present location.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects on the grounds that this Interrogatory seeks to invade Crane Co.'s attorney work product. Subject to and without waiving the foregoing objections, Crane Co. is not

aware of any documents, other than documents it obtained in connection with asbestos litigation, that address asbestos-related hazards relating to Crane Co.'s products. See Preliminary Statement, § B.

INTERROGATORY NO. 19:

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

- (a) The name and address of each such association or organization;
- (b) The dates during which Defendant or any of its subsidiaries or predecessors were members;
- (c) The names and dates of any publications, minutes, or reports published, written or disseminated by any of the named associations or organizations; and
- (d) Whether any of those publications are still in your possession, and if so:
 - (i) A description of the publications, including; the date;
 - (ii) The current locution of such publications;
 - (iii) The custodian of such publications; and
 - (iv) The method or manner in which such publications are maintained.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of receiving information of the type requested in this Interrogatory from any organization of which it was a member. See Preliminary Statement, Section B.

INTERROGATORY NO. 20:

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products.

Subject to and without waiving the foregoing objections, to the best of its present knowledge and according to its annual reports, without limitation, Crane Co. assembled and/or manufactured valves at plants located in Chicago, Illinois; Chattanooga, Tennessee; Indian Orchard, Massachusetts; Jonesboro, Arkansas; Rogers, Arkansas; Long Beach, California; and Washington, Iowa; pumps at plants located in Rogers, Arkansas; Salem, Ohio; and Warrington, Pennsylvania; deaerators at a plant located in King of Prussia, Pennsylvania; and boilers at plants located in Pennsylvania, New York, and New Jersey.

Crane Co. also manufactured other products at other locations. Crane Co. did not ever manufacture any of the asbestos-containing components that may have been included in the pumps, valves, deaerators, or boilers. Accordingly, those components would not have been manufactured at any of the locations listed above. See response to Interrogatory No. 4; see also Preliminary Statement, § B.

INTERROGATORY NO. 21:

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

- (a) The name, address, and job title of each person or entity who prepared such materials;
- (b) The name, address, and job title of each person who currently has possession of such materials and their present location;
- (c) The date the materials were prepared; and
- (d) The media used to disseminate the sales materials.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products, and on the grounds that it is vague and ambiguous and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s knowledge, it distributed catalogs that would have referenced products identified in Interrogatory No. 4. Crane Co. will produce catalogs to plaintiffs at a mutually agreeable time and place. Crane Co. further believes that it produced other promotional materials that mentioned those products. However,

Crane Co. is not presently aware of any formal collection of such promotional materials.

See Preliminary Statement, § B.

INTERROGATORY NO. 22:

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

- (a) The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation;
- (b) The name, address and job title of each person who currently has possession of such material or instructions and their present location;
- (c) The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors; and
- (d) The year each such written material or instruction was prepared and disclosed to potential customers.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions and is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory as being unduly burdensome because it is not limited in time or geographical area. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, with respect to the products sold by Crane Co. is not presently aware of having distributed any such materials in North America. See Preliminary Statement, Section B.

INTERROGATORY NO. 23:

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. is liable on any of the claims made by Plaintiff herein. Subject to and without waiving the foregoing objections, the following chart identifies the confirmed primary insurance coverage available to Crane Co. Additional primary coverage may be available for prior years, but is subject to dispute by certain carriers:

Carriers	Policy Number	Term	Limits
Globe Indemnity	GLC 011930	1/1/60-1/1/61	1 M OCC/2M AGG
Globe Indemnity	GLC 011931	1/1/61-1/1/62	1M OCC/2M AGG
CCC	CL 4293679R	7/1/61-7/1/64	1M OCC/2M AGG PER YEAR
Liberty Mutual	LG1621004017028	2/1/68-2/1/69	1M OCC/2M AGG
Liberty Mutual	LG1621004017029	2/1/69-2/1/70	1M OCC/2M AGG
Liberty Mutual	LG1621004017020	2/1/70-2/28/71	1M OCC/2M AGG
Hartford	10 CA 46800	2/28/71-7/1/72	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/72-7/1/73	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/73-7/1/74	1M OCC/1M AGG
Aetna	01AL260803SCA	7/1/76-7/1/77	1M OCC/1M AGG
Aetna	01AL260851SCA	7/1/77-7/1/78	1M OCC/2M AGG
Aetna	01GL8SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01AL265932SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01GL1475SCA	7/1/79-7/1/80	1M OCC/2M AGG
Aetna	01AL265996SCA	7/1/79-7/1/80	1M OCC/2M AGG
Continental	SRL3636025	7/1/80-7/1/81	1M OCC/2M AGG
Continental	SRL3636199	7/1/81-7/1/82	1M OCC/2M AGG
INA	CFG209262	7/1/82-7/1/83	1M OCC/2M AGG
INA	CFG209868	7/1/83-7/1/84	1M OCC/2M AGG
INA	CFG3141403	7/1/84-7/1/85	1M OCC/2M AGG
INA	CFG G07749673	7/1/85-7/1/86	1M OCC/3M AGG

INTERROGATORY NO. 24:

As to the disease asbestosis, state:

- (a) The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by human;
- (b) How Defendant became aware of the existence of the disease;
- (c) Who within the company first discovered, recognized or understood the adverse consequences or effects of, the disease and/or of asbestos exposure;
- (d) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects;
- (e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form;
- (f) Who is the custodian of such information and
- (g) The date on which you first received knowledge or information that asbestos was caused by inhalation of asbestos fibers.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental

Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 25:

As to the disease lung cancer, state:

- (a) The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans;
- (b) How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure;
- (c) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure,

- (d) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects;
- (e) Whether any such information is still maintained by Defendant or its subsidiaries or predecessors, in any written form;
- (f) Who is the custodian of such information; and
- (g) The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately

1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO: 26:

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

- (a) The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans;
- (b) How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos;
- (c) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure;
- (d) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects;
- (e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form;
- (f) Who is the custodian of such information; and
- (g) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 27:

As to the disease mesothelioma, state:

- (a) The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans;
- (b) The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers;
- (c) How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos;
- (d) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects asbestos exposure;
- (e) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects;
- (f) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form;
- (g) Who is the custodian of such information; and
- (h) Whether Defendant agrees that there is no known medical cure for mesothelioma

ANSWER: Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans.

Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in

scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's.

INTERROGATORY NO. 28:

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

- (a) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans;
- (b) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers;
- (c) The date on which Defendant first suspected other cancers were caused by asbestos inhalation;
- (d) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure;
- (e) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such, adverse consequences or effects;
- (f) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form;
- (g) Who is the custodian of such information; and
- (h) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of

human disease, its cause, and its diagnosis. Subject to and without waiving the foregoing objections, Crane Co. is not aware of any established causal link between the diseases referred to in this Interrogatory and asbestos exposure.

INTERROGATORY NO. 29:

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects because this Interrogatory seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to Crane Co.'s products. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Nevertheless, Crane Co. did not ever believe that any product it sold was harmful when used as intended. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products.

Subject to and without waiving the foregoing objections, any asbestos dust or fibers that may have been emitted from the asbestos-containing components encapsulated within Crane Co.'s valves was at a de minimis level and significantly below OSHA regulatory

levels. Moreover, at such low levels, there has never been an OSHA requirement that warnings or precaution labels regarding asbestos be placed on these components or their packaging. Accordingly, without regard for other products, Crane Co. contends that the asbestos-containing components contained within its valves did not pose health hazards to workers who came into contact with them.

INTERROGATORY NO. 30:

Describe in detail the types or packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products, and on the grounds that it is vague and ambiguous. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any particular "packages" or "packaging" that may have been associated with its products.

INTERROGATORY NO. 31:

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

- (a) The name of the company manufacturing the asbestos products;
- (b) The trade name affixed to those products;

- (c) The periods of time covered by such agreement;
- (d) The volume, in dollar amount, of each transaction; and
- (e) The initial purchaser of the products.

ANSWER: Crane Co. objects to this Interrogatory because the term "rebranding" is vague and ambiguous. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s knowledge, it never engaged in the "rebranding" of asbestos-containing products, as it understands those terms. See also objections and response to Interrogatory No. 4; Preliminary Statement, Section B.

INTERROGATORY NO. 32:

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome, overbroad and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products.

Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of all of the entities from which it obtained asbestos-containing components for its industrial products. Nevertheless, based upon available documents, it appears that, at various times, Crane Co.'s approved suppliers may have included B.F. Goodrich Co.,

Goodyear Tire & Rubber Co., and Sweet Rubber Co. of Akron, Ohio, with respect to "Cranite" material, Raybestos-Manhattan, Inc., Garlock, Inc., Johns-Manville, Inc., "Klingerit" and Nicolet, Inc., with respect to sheet gasket material, Crane Packing Co. (later John Crane-Houdaille, Inc.), Anchor Packing, Raybestos-Manhattan, Greene-Tweed, Garlock, Inc., Johns-Manville, Inc., Lindstrom & King, and R.M. Industrial Products with respect to valve packing, Flexitallic, Spirotallic, Lamons Gasket Co., and R-Way Gasket & Supply Co., with respect to spiral wound gaskets, Aberden Industries, Inc., with respect to discs, Johns Manville and Keasby Mattison with respect to cement pipe, and Johns-Manville, Inc. with respect to miscellaneous products. The foregoing list is not intended to be an exhaustive list of Crane Co.'s suppliers. See Preliminary Statement, § B.

INTERROGATORY NO. 33:

Does Defendant or any of its subsidiary or predecessor companies currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 31? If the answer is affirmative, state:

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

ANSWER: See objections and response to Interrogatory No. 31.

INTERROGATORY NO. 34:

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

- (a) A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim;
- (b) The disease alleged in each such claim.
- (c) A brief summary of the disposition of each such claim; and
- (d) The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence. To the best of Crane Co.'s present knowledge, plaintiff neither worked at nor has alleged that he was exposed to asbestos-containing products at a Crane Co. facility. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no.

INTERROGATORY NO. 35:

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

- (a) The dates of each such meeting;
- (b) The general subject matter discussed at each meeting;
- (c) Who was in attendance at each meeting;
- (d) Where and by whom the written minutes are presently maintained;
- (e) By whom the minutes were taken and put into final format; and
- (f) Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome and overbroad, in that it is not limited to Crane Co.'s products, and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it seeks to invade attorney client privilege and work product. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, there are no board of directors minutes addressing asbestos issues outside of those that discuss the defense of asbestos litigation, which are protected by attorney client privilege and/or the work product doctrine. See Preliminary Statement, § B.

INTERROGATORY NO. 36:

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

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

ANSWER: Crane Co. objects to this Interrogatory because it is not limited in geographical scope. Crane Co. further objects to the use of the phrases "subsidiaries" and "foreign business entities" as being vague, ambiguous, argumentative and/or seeking a legal conclusion. As Crane Co. stated in the Preliminary Statement, Crane Co.'s answers to these Discovery Requests are limited to Crane Co., upon whom the Discovery Requests were served. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s knowledge, Crane Co. did not ever and does not presently manufacture any asbestos containing products. See objections and response to Interrogatory No. 4.

INTERROGATORY NO. 37:

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

- (a) The location of such documents;
- (b) The name and address of the custodian of the documents; and
- (c) The format in which the documents are kept, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER: Crane Co. objects to this Interrogatory on the grounds that the scope of the inquiry is so broad that this inquiry is nothing more than a prohibited fishing expedition. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, in that it is not limited in any way to plaintiff's exposure. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the

foregoing objections, Crane Co. has no organized collection of sales records related to asbestos issues. Records relevant to the issues raised in this Interrogatory may be located in various document repositories or operating facilities. Nevertheless, as presently worded, this Interrogatory is overbroad. See Preliminary Statement § B.

INTERROGATORY NO. 38:

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

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

ANSWER: Crane Co. objects to this interrogatory as being premature. Crane Co. will submit information regarding witnesses pursuant to the rule of civil procedure and any court order regarding disclosure of witnesses entered in this matter. Subject to and without waiving the foregoing objections, Crane Co.'s use of company representatives as witnesses will depend upon the product identification relevant to plaintiff's case. Those witnesses will be identified at the appropriate time, after Crane Co. receives product identification evidence from the plaintiffs.

INTERROGATORY NO. 39:

Has Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold,

processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state,

- (a) Full and correct name;
- (b) Principal place of business;
- (c) State of incorporation;
- (d) Date of acquisition by Defendant; and
- (e) Whether or not the business entity was ever authorized to transact business in this state.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that it not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, see objections and response to Interrogatory No. 4. In addition, information responsive to this Interrogatory covering the time period 1960 to the present may be ascertained by reviewing Crane Co.'s annual reports, copies of which for the period 1960 to 2000 will be produced to plaintiff at a mutually agreeable time and place.

INTERROGATORY NO. 40:

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that the terms "altered" or "substantially changes" are vague and ambiguous, and to the extent it implies

that Crane Co. manufactured any asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. generally expected the products referenced in its Answer to Interrogatory No. 4 to reach the purchaser in the same condition in which they were delivered.

INTERROGATORY NO. 41:

For each asbestos-containing product identified in your answers to these Interrogatories, identify all foreseeable users, such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. did not control the products referenced in its answer to Interrogatory No. 4 once they left its possession. The subsequent use of those products was within the control of the purchaser, not Crane Co.

INTERROGATORY NO. 42:

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

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

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects to this Interrogatory to the extent it is framed in the present tense. Subject to and without waiving the foregoing objections, Donna M. Ringo CIH, the expert industrial hygienist whom Crane Co. has retained to assist it in this litigation, has opined that "the fiber release associated with the use, handling, and removal of asbestos-containing gaskets and packing products do not present a hazard to users in the workplace or bystanders. The de minimus, if any, fiber release associated with the use, handling, installation, and removal of these products is significantly below current OSHA regulatory exposure levels."

INTERROGATORY NO. 43:

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Subject to and without waiving the foregoing objections, gaskets, packing and discs contained in Crane Co. industrial equipment may have needed to be replaced from time to time.

INTERROGATORY NO. 44:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where

your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 45:

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

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, in the 1980s, Crane Co. performed dust monitoring at two of its valve plants. The results of that monitoring revealed the presence of fibers at no greater than background levels. Accordingly, no action was necessary.

INTERROGATORY NO. 46:

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

- (a) Name of the person or firm conducting such studies;

- (b) The date the studies began and the date they were completed;
- (c) Any publication or other written dissemination of the results of the studies; and
- (d) The nature of any action to eliminate or minimize the inhalation of asbestos dull fibers.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, as a result of, inter alia, the knowledge that was available during the time that Crane Co. sold valves with asbestos-containing components and the dust monitoring at the two plants described above, Crane Co. did not believe any studies responsive to this Interrogatory were necessary.

INTERROGATORY NO. 47:

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

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and

without waiving the foregoing objections, to the best of Crane Co.'s knowledge, it presently knows of no individuals or departments who, on its behalf, were responsible for researching any particular asbestos-containing products.

INTERROGATORY NO. 48:

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

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome, and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have a Medical Department devoted to asbestos issues. See Preliminary Statement, §B.

INTERROGATORY NO. 49:

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

ANSWER: **See objections and response to Interrogatory No. 13.**

INTERROGATORY NO. 50:

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

ANSWER: **See objections and response to Interrogatory No. 4.**

INTERROGATORY NO. 51:

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects to this Interrogatory to the extent it implies that there was a product that "could be substituted for" asbestos-containing components that may have been associated with any Crane Co. product. Subject to and without waiving the foregoing objections, in the late 1970s and early 1980s, as a result of changes in customer preferences, Crane Co. began to explore the prospect of replacing the asbestos-containing components in its industrial products. At that time, Crane Co. encountered difficulty locating suitable substitute components. Nevertheless, Crane Co., modified its engineering specifications in 1985 to phase out

asbestos-containing components from all valves manufactured in the United States other than one specific valve designed for petroleum industry applications, which required the use of asbestos-containing packing material.

INTERROGATORY NO. 52:

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

- (a) All details of such recall;
- (b) The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;
- (c) The dates of the recall; and
- (d) The purpose for the recall.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to the term "recall" as being vague and ambiguous. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

INTERROGATORY NO. 53:

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

ANSWER: Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects to this Interrogatory, because it is ambiguous in its reference to a product that "could be substituted for" asbestos-containing components that may have been associated with any Crane Co. product. Subject to and without waiving the foregoing objections, with respect to the valve packing and gasket materials that may have been incorporated into Crane Co. valves, prior to at least 1970, there were not any non-asbestos materials of which Crane Co. is presently aware that could perform the same functions to the same level of performance as asbestos-containing components that were used during that time period.

INTERROGATORY NO. 54:

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

ANSWER: Crane Co. objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects that the phrase "not performed as intended" is vague and ambiguous. Subject to and without waiving the foregoing objections, because Crane Co. does not know what is meant by "not performed as intended" it cannot respond to this Interrogatory.

INTERROGATORY NO. 55:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the

date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, in the 1980s, Crane Co. performed dust monitoring at two of its valve plants. The results of that monitoring revealed the presence of fibers at no greater than background levels.

INTERROGATORY NO. 56:

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

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

ANSWER: Crane Co. objects to this interrogatory because it is unduly burdensome. Subject to and without waiving the foregoing objections, while Crane Co. is today aware of the applicable regulations governing asbestos exposure levels, Crane Co. has no present knowledge of the precise circumstances regarding how or when it first became aware of such limits.

INTERROGATORY NO. 57:

Were the threshold limit values or maximum allowable concentrations inquired about in the previous Interrogatory for total dust, and not asbestos dust alone?

ANSWER: See objections and response to Interrogatory No. 56. By way of further response, Crane Co. objects to this Interrogatory on the grounds that it is unduly burdensome because the answer requires industrial hygiene expertise and is a matter for expert testimony.

INTERROGATORY NO. 58:

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

ANSWER: Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, in the 1980s, Crane Co. performed dust monitoring at two of its valve plants. The results of that monitoring revealed the presence of fibers at no greater than background levels.

INTERROGATORY NO. 59:

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

- (a) The name, address, and job classification of each such expert witnesses;

- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify and produce each such document or report;
- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above; and
- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER: Crane Co. objects to the Interrogatory as being premature. Crane Co. will provide this information pursuant to the Rules of Civil Procedure and/or Court Order. Crane Co. cannot identify the expert witnesses it intends to call without knowing the product identification evidence that plaintiffs will offer. As such, Crane Co. will supplement this response when appropriate.

INTERROGATORY NO. 60:

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

- (a) Identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case;

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

ANSWER: Crane Co. objects to this Interrogatory as being premature. Crane Co. will provide the information requested by this Interrogatory pursuant to the Rules of Civil Procedure or applicable Court Order. Subject to and without waiving the foregoing objections, in addition to the plaintiff, Crane Co. believes that the following categories of witnesses have knowledge of relevant facts, which include plaintiff's co-workers, plaintiff's employers, and manufacturers and suppliers of asbestos-containing products to which plaintiff was exposed.

INTERROGATORY NO. 61:

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

ANSWER: Crane Co. objects to this interrogatory as an improper inquiry into defendant's "core work product" and trial strategy, and thus not subject to discovery under the Texas Rules of Civil Procedure. Crane Co. will however, comply with any court order relating to the preparation of an exhibit list or list of proposed deposition testimony to be used at the trial of this case.

INTERROGATORY NO. 62:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

- (a) Identify the name and position of the employee or officer who received same;
- (b) Please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;
- (c) Please produce all documents upon which your responses above are based;
- (d) Please identify the name(s) and address(es) of any person(s) who can verify your above response;
- (e) Did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander.
- (f) If so, please produce every document which evidences in any way, that Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 62(e) above; and
- (g) If your answer to 62(c) is yes, when was the first date Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in 64(c) above?

ANSWER: Subject to and without waiving the foregoing General Objections, to the best of Crane Co.'s present knowledge, it never received a copy of the article identified in this interrogatory, outside of the asbestos litigation. See Preliminary Statement, § B.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in

Public Health Bill, No. 241, U.S. Public Health Service; and authored by W. C. Dreessen ("the Dreessen Report")?

- (a) Identify the name and position of the employee or officer who received same;
- (b) Please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;
- (c) Please produce all documents upon which your responses above are based;
- (d) Please identify the name(s) and address(es) of any person(s) who can verify your above response;
- (e) Did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;
- (f) If so, please produce every document which evidences in any way, that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory No. 63(c) above;
- (g) If your answer to 63(e) is yes, when was the first date Defendant relied on the Dreessen Report in whole or in part for the proposition stated in 64(e) above?

ANSWER: Subject to and without waiving the foregoing General Objections, to the best of Crane Co.'s present knowledge, it never received a copy of the article identified in this interrogatory outside of the asbestos litigation. See Preliminary Statement, § B.

II. REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

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

RESPONSE: Crane Co. objects to this Request to the extent it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co.

will produce to plaintiff copies of the catalogs referenced in response to Plaintiffs' Interrogatories at a mutually agreeable time and place.

REQUEST FOR PRODUCTION NO. 2:

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

RESPONSE: Crane Co. objects to this Request because it is ambiguous and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any diagrams or schematics providing the information requested by this Request, as it understands those terms. However, information responsive to this Request may be available from Crane Co.'s annual reports, copies of which will be produced to plaintiff at a mutually agreeable time and place.

VERIFICATION

I, Anthony D. Pantaleoni, the undersigned declare as follows:

I am Anthony D. Pantaleoni of Crane Co., one of the answering defendants in the above-entitled matter, and I have been authorized to make this verification on its behalf.

I have read the foregoing **CRANE CO.'S RESPONSES TO PLAINTIFFS' MASTER SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANTS** and know the contents thereof. The answers given are true and accurate to the best of my knowledge, information, belief, and as I am informed by others based upon a review of existing business records and interviews of former employees of the company.

Dated: _____

Signed: _____
Anthony D. Pantaleoni

DUNN, KACAL, ADAMS, PAPPAS & LAW

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

ONE RIVERWAY, SUITE 1200

HOUSTON, TEXAS 77056

TELEPHONE (713) 529-3992

FACSIMILE (713) 529-8161

ROBERT L. ADAMS

SHAREHOLDER

radams@dkapl.com

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Scott
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DALLAS

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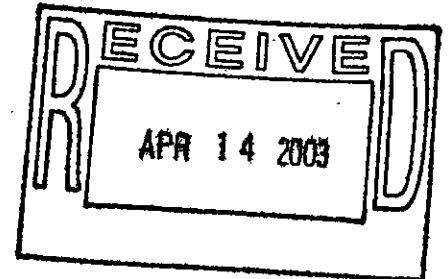
DALLAS, TEXAS 75202

TELEPHONE (214) 651-8100

FACSIMILE (214) 651-8116

April 11, 2003

Mr. Scott Hendler
The Hendler Law Firm, P.C.
816 Congress Avenue, Suite 1230
Austin, Texas 78701



RE: Crane Co. discovery responses

Dear Mr. Hendler

As per your request, enclosed please find a copy of Crane Co.'s answers to discovery which you have requested.

Very truly yours,

A handwritten signature in cursive script that reads 'Robert L. Adams'.

Robert L. Adams

RLA:mo
21882\8\ltr2.rla
Enclosure