



(vi) Which products or ingredients were mined, which were manufactured and which were distributed by answering defendants.

ANSWER OF BOTH HERCULES AND CCC: The following information is answered only in relation to those asbestos-containing products produced, manufactured and sold by Haveg Industries, Inc. for the years 1940 to 1979. Haveg Industries, Inc. produced, manufactured and sold corrosion-resistant chemical process equipment, "Haveg" designed for the maintenance free handling of sulfuric, hydrochloric and phosphoric acids and chlorinated solvents. For more further and detailed information, refer to the Product Catalogs in possession of defense counsel, Biggs and Battaglia, which have been produced for review, inspection and copying at request, and are contained in Request/Subpoena File A-49. For information regarding suppliers, refer to files A1-57 and A2-58-77.

Briefly, the information contained in those Product Catalogs is as follows:

HAVEG PIPE AND FITTINGS are designed for handling abrasive environments ( which tend to erode protective coatings on line pipe). Pipes and Fittings may also be used in a submerged state or in areas having severe atmospheric corrosion problems.

Split Flanged Pipe - designed for standard application, i.e., handles abrasive environments.

Threated Pipe and Bell End Pipe - for applications where immersed pipe required.

Pipe Fittings - connect pipe systems. Fittings include:

Sleeves	Rings
Couplings	Crosses
Flanges	45° Lateral
Discs	Caps
Ells: 90°, 45°, 60°, 30°, 22-1/2°	
Reducers	Plugs

Fume Duct and Fittings - handle gases or fumes in ventilator lines, gas distribution systems and similar applications.

Expansion Joints are for piping lines which may be subject to bending, distortion or vibration regardless of temperature.

Expansion Joint Sleeves - method of connecting piping to allow for expansion.

Valves - designed for which all the surfaces of the valve in contact with a solution are made of HAVEG. Regulates liquid flow. Furnished with an asbestos graphite packing unless otherwise specified.

Types of valves include:

Y, Diaphragm, Flush, Check (vertical and horizontal), Foot, Angle, Butterfly damper (regulates gas flow), Gate damper.

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TANKS AND TOWERS are construction materials designed for maximum corrosion resistance and physical strength in the chemical process industries.

Types of tanks and towers include:

Cylindrical tanks - used as pressure reactors, horizontal and vertical tanks in the chemical process industry.

Cylindrical towers - used for adsorbing, absorbing, stripping, scrubbing and fractionating columns in the chemical process industry.

Rectangular tanks - used in the chemical process industry for storage, reaction tanks, filters; also, pickling, cleaning and etching by the metallurgical industry.

Tank and tower accessories are designed primarily for use with tanks and towers.

Accessories include:

Grid bars - standard Haveg packing support.

Distributor Trough - standard Haveg liquid distributor.

Nozzles - pipe connectors on tanks and towers.

Dished Cover - used to cover cylindrical tanks vented to the atmosphere; can also be supplied as a loose cover, i.e., resting and not fastened to the top of the tank.

Scrubber Cover - designed to cover cylindrical tower.

Thermowells - container for temperature sensing devise;  
internally installed on tanks and towers.

Gauge glasses

Sight glasses - designed to be mounted on tanks with or  
without valve cut-offs to permit observation of the tank  
contents.

Heater & Coil Supports - designed to support any type  
heater, either plate or coil type, either molded or placed  
loosely in the tank.

Plug Outlets are designed for use as drop valves, emergency  
closures for storage tanks.

Plugs - for use in conjunction with plug outlets.

Circulating Tank Heaters and Steam Pipes

Liquid Seals and Stuffing Boxes for use as seal on agitator  
shafts.

Manholes - covers vessels, tanks and towers.

Bubble Cap

Carbon Bed Support - are perforated plates with a filter  
cloth in between, designed as method to support carbon particles  
in adsorption towers.

Agitators are designed for stirring free-flowing liquids and  
thin sludges.

Haveg Rolls - designed for use in textile agers, dye tubs, pickling tanks.

Cements - manufactured and designed for the repair, alteration and installation of Haveg chemical equipment; a putty-like molding mixture for general use in alteration of Haveg equipmet, which provides hard and strong joints or building-ups on the original equipment.

Sheet Stock - constructional material used in towers, vessels and pipes to make parts, e.g., to construct rectangular vessels.

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The above-referenced Haveg equipment was available in a variety of different formulations, depending on the precise nature of the chemical application involved. The different Haveg formulations or grades were as follows:

Grade Haveg 41 produced for the years 1940-1979

Haveg 41 consisted of approximately 50% (by weight) or an acid-leached anthophyllite asbestos which was completely encapsulated in a phenol-formaldehyde resin approximately 50% (by weight). Haveg 41 was a thermoset type plastic, i.e., the resin is "set" and cannot be fostened when subjected to heat. Grade 41 was recommended for processes involving mineral acids, salts and chlorinated hydrocarbons.

Grade Haveg 61 produced for the years from approximately  
1955-1979

Haveg 61 consisted of approximately 50% (by weight) of an acid-digested anthophyllite asbestos filler which was completely encapsulated in a furfuryl alcohol-formaldehyde resin approximately 50% (by weight). Haveg 61 was a thermoset type plastic, i.e., the resin is "set" and cannot be softened when subjected to heat. Grade 61 was recommended for processes involving acids, alkalis and chlorinated aromatic hydrocarbons.

Haveg 4120 consisted of approximately 50% (by weight) of an acid-digested anthophyllite asbestos filler which was completely encapsulated in a modified phenol-formaldehyde resin, approximately 50% (by weight). Haveg 4120 had exceptional resistance to some chemicals for which neither Haveg 41 nor 61 are recommended, e.g., monochloroacetic acid.

Haveg 31 consisted of approximately 50% (by weight) of an acid-digested anthophyllite asbestos filler which was completely encapsulated in a modified phenolic resin approximately 50% by weight). Haveg 31 was recommended for use in the chlorine industry in the form of cell connectors, headers and chlorine coders; 31 provided excellent resistance to we chlorine gas.

Haveg 91

Acid Washed/Digested Anthophyllite Asbestos, sold under  
trademark HAVESTOS - acid leaching process which removed  
soluble materials, making material more chemically resistant.  
Mixed with resin to make Haveg equipment or plastic products.

Acid Washed/Digested produced for the years 1932 through  
1979

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CHEMTITE piping systems - designed for conveying corrosive  
fluids for demanding process operations on drain conditions  
indoor, outdoor or underground. Piping systems were designed for  
high pressure or low pressure applications with complimentary  
fittings.

Fittings - connect the piping systems. Fittings include  
Couplings, Flanges (external or internal), Ells - 90°,  
threaded, flanged or socket, close nipples, Reducing bushings,  
Tees (threaded or flanged), Valve body (internal thread or  
flanged), Countersink plug, Step plug, Repair sleeve.

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CHEMTITE DIAPHRAGM VALVE - designed to seal off fluids and  
gases from working parts.

Chemtite equipment was available in two formulations:  
Produced for the years 1971-1979

Chemtite PB consisted of approximately 40% (by weight) of crocidolite asbestos paper or chrysotile asbestos which was completely embedded in an inert phenolic resin matrix approximately 60% (by weight).

Produced for the years from approximately 1971-1976

Chemtite EB consisted of approximately 40% (by weight) of crocidolite asbestos paper or chrysotile asbestos which was completely imbedded in an inert epoxy resin matrix approximately 60% (by weight).

Crocidolite is a complex sodium-iron silicate of the flat, solid fiber (amphibole) group. Chrysotile is an hydrous magnesium silicate of the bubular fiber type. Anthophyllite is magnesium-iron silicate of the flat, solid fiber (amphibole) group.

Hercules objects to responding beyond the information provided and limits its answer to the operations of the Marshallton plant on the bases that such information is not relevant or calculated to lead to the discovery of any relevant or admissible evidence.

In addition, Aerospace products were manufactured at the Haveg Marshallton plant during the early 1960's until 1965. For information concerning the composition of those products, refer to the deposition of Jack Mertz taken in June 1985; also the

depositions of Leon DeBrabander taken on 10/4/83, 11/18/84, 1/19/84 and 2/21/84 and the depositions of Eugene O'Neill taken on 10/7/83, 1/17/84, 2/22/84 and 2/23/84 would contain information concerning the chemical and raw material composition of Haveg products.

2. If any product identified in answer to Interrogatory No. 1 was produced, manufactured and/or sold under a trade name, identify that trade name(s) and state the time period that each such product was sold under such trade name.

ANSWER OF HERCULES AND CCC:

HAVEG	1940-1980
CHEMTITE	1971-1980
HAVESTOS	from approx. 1962-1968

Further information may be found in the Product Catalogs contained in File A-49. Refer to the answer to Interrogatory #1

3. For each product identified in answer to Interrogatory No. 1, state:

(a) The address of each plant where it was manufactured, processed or packaged;

(b) Whether you were the sole producer, manufacturer and/or distributor of the product and, if not:

(i) The name and address of each other person, firm or other entity engaged in the production, manufacture and/or distribution of the product (including companies which rebranded for the answering defendant);

(ii) Whether any other manufacturer produced the product by virtue of a franchise or license from you;

(iii) The persons or firms who produced the product for distribution in the United States;

(iv) The person or firms who produced the product for distribution in the State of Delaware.

(c) All products the answer defendant manufactured, mined or sold which it would relabel for others and the name of any entity such relabeling occurred for, including when, where and with whom defendant dealt with.

(d) Any changes answering defendant made in the product or packaging for others of its products and any changes answering defendant requested be made in products or packaging of products others rebranded for the answering defendant.

ANSWER OF HERCULES AND CCC:

(a) 900 Greenbank Road, Wilmington, DE 19808

(b) Each product identified in Answer to Interrogatory No. 1 was produced, manufactured and distributed from 900 Greenbank Road, Wilmington, DE 19808. Also, from approximately 1962 to 1968, HAVESTOS was sold by Asbestos Corporation of America, 31 North Avenue, Garwood, New Jersey.

(ii) No.

(iii) Other than Haveg, no other firm known to defendants Haveg and Hercules produced the products for distribution in the United States.

(iv) Refer to answer to Interrogatory No.

3(b)(iii).

4. For each product identified in answer to Interrogatory No. 1, state:

(a) How the product was sold and/or distributed for use in the United States and/or the State of Delaware;

(b) (i) Identify all persons, firms or other entities to whom these products were sold for distribution during the period 1936 to 1980;

(ii) Identify all entities to which a sale was made from 1936 to 1980 in Delaware, Pennsylvania, New Jersey and Maryland between 1936 and 1980.

- (c) For each such person, firm or other entity identified in answer to subpart (b) above, state the following:
- (1) The specific product sold and/or distributed;
  - (2) The quantity (i.e. boxes, linear feet) of the product sold and/or distributed;
  - (3) The dates which these products were sold, shipped and delivered to each entity;
- (d) Identify each individual who has any knowledge of these sales and/or distribution and state with specificity and particularity the substance of each individual's knowledge;
- (e) Identify and produce all documents which refer, reflect or relate to all sales and/or distribution of each such product to each such entity identified above.

ANSWER OF HERCULES AND CCC: Sales representatives were employed by Haveg Industries, Inc. in various states to promote sales.

5. For each product identified in answer to Interrogatory No. 1, state whether you, your subsidiaries or predecessors in business engaged in any advertising program to promote the sale of that product and, if so state:

- (a) The name or description of each advertising media that you have used to promote the product during the period 1936 to 1980;
- (b) The name of each national magazine or periodical in which you have advertised the product during the period 1936 through 1980.
- (c) The date of each issue of such magazine or periodical in which such advertisement appeared;
- (d) The name and address of each newspaper in which it advertised the product during the period 1936 through 1980;
- (e) The date of each publication of each newspaper in which the advertisement appeared;
- (f) Identify and produce each document which refers, reflects or pertains to each such advertisement which was published in each such magazine, periodical and/or newspaper;
- (g) State whether the advertising of the product was handled by an agency and, if so, state the name and address of each advertising agency that handled any portion of the advertising of the product during the period 1936 through 1980.

ANSWER OF HERCULES AND CCC: Sales were through sales representatives, trade journals and product catalogs. Refer to Exhibit "A" attached for listing of advertising agents.

6. With regard to each form of asbestos fibers identified in the answer to Interrogatory 1(a) and 1(c), state:

- (a) Where it was purchased, if it was not purchased where it was obtained;
- (b) From whom it was purchased;
- (c) The manner in which it was received, stored and used in the production of the product.

ANSWER OF HERCULES AND CCC: In response to this interrogatory, refer to Request/Subpoena documents already produced, in particular Files A1-57, A2-58-77. In addition, refer also to the deposition of Jack Mertz for Aerospace purchases and the depositions of Eugene O'Neill and Leon DeBrabander for the identity of suppliers, storage and use of the materials purchased. Also, the depositions of Paul Reynier from 2/10/81, 9/15/82 and 8/16/84 regarding suppliers and contacts with suppliers.

7. If you have ever manufactured or had a subsidiary or predecessor in the corporate chain manufacture any insulation products which are commonly used by insulators and which contain asbestos;

(a) Describe the process or method of how the products listed in 1 are cut, shaped, mixed and applied on the jobs giving particular reference as to whether or not the materials have to be sawed or cut on the job, blown into confined areas, or mixed with water into a cement or paste;

(b) State if there is any way known to the defendant that the products listed below can be used and applied without the worker inhaling any of the asbestos dust or fibers:

- (1) Asbestos cement; Asbestos Finishes;
- (2) Asbestos pipe covering;

- (3) Asbestos bricks or blocks;
- (4) Asbestos sheeting;
- (5) Asbestos insulation used to cover extremes of heat as well as cold;
- (6) Asbestos insulation in loose form which may be blown into homes or buildings;
- (7) Asbestos in spray form;
- (8) Asbestos mineral in fiber form or particulate form;
- (9) Asbestos Millboard, rope, gaskets, paper gloves or blanket.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that it appears to request information not relevant to the plaintiffs involved in this case nor the issues presently involved in this matter, and is not calculated to lead to the discovery of further relevant or admissible evidence. The purpose of this interrogatory is confusing and unclear to these answering defendants. Based upon defendants' understanding of this question and not waiving any objects that have been raised previously, Haveg Industries, Inc. manufactured asbestos containing products which could have been used by insulators. Neither defendant has any knowledge as to how each product was used by each customer on each job.

8. If any piece of equipment which was used at any time to install, cut, shape, etc. products identified in answer to Interrogatory No. 1 or 7(b) was invented, developed or first made by answering defendant or any person associated with you or any related company or association, state:

(a) When it was invented, developed or made (including changes or improvements to previously available equipment);

(b) The identity of each individual who participated therein and describe in detail the extent of his participation;

(c) The identity of each document which reflects, refers or relates to any information set forth in answers to this interrogatory.

(d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: To the best of defendants' present knowledge, no equipment was invented, developed or first made by them for the use in applying any of the products listed in response to Interrogatory No. 1.

However, any patents regarding the Haveg product are available for inspection and review. To the best of defendants' knowledge, none were attributed or developed by Hercules.

9. For each process and/or method identified in answer to Interrogatory No. 7(a) developed or first made by you or any person associated with you or any related company or association, state:

(a) When and where it was developed;

(b) The identity of each individual who participated therein and describe in detail the extent of his participation;

(c) The identity of each document which reflects, refers or relates to any information set forth in answer to this Interrogatory;

(d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: To the best of these defendants' knowledge, Hercules did not develop the process and/or method by which any products listed in response to Interrogatory No. 1 would be applied or contained in Interrogatory No. 7(a).

ANSWER OF CCC: To the best of defendant's knowledge, it did not develop the process and/or method by which any products listed in response to Interrogatory No. 1 would be applied as contained in Interrogatory No. 7(a). To the extent that information is sought regarding the patents of Haveg products, these records are available for review, inspection and copying.

10. For each product identified in the answer to Interrogatory No. 1, describe what, if any, tests were made to determine the safety of said product and:

- (a) State when and where each such test was made;
- (b) Describe the results of each such test;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this interrogatory;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: The tests presently known to defendants performed by Haveg Industries, Inc. were tests that fall into the category of corrosion resistance tests and physical property tests. For more detailed information regarding tests, refer to the depositions of Leon DeBrabander.

11. For each label, brochure, or other written material describing or relating to the use of each product identified in answer to Interrogatory No. 1, produced by you or any entity associated with you or any related company or association;

- (a) Describe its contents;
- (b) State when, where, how and to whom it was distributed;
- (c) State the manner in which it was placed on or in the product container or whether it was separate from the product

container, or whether it was separate from the product or container;

(d) State whether any written, printed or graphic matter was present to warn of any potentially toxic ingredient including asbestos it might contain. If so, state:

(i) Whether a signal word, i.e. "danger", "warning" or "caution" was present;

(ii) Whether the signal word was printed in boldface, capital letters or different colored inks. Which?

(iii) The wording of the statements describing any toxic ingredient.

(iv) The wording of all directions and/or instructions pertaining to any method of use to avoid any danger resulting from the toxic ingredient.

(v) List the instructions provided for each product's use.

(e) Identify each individual who participated in the writing of the label, brochure or other written materials and describe in detail the extent of his participation;

(f) Identify each document which reflects, refers or relates to the information contained on the labels, brochurs or other written materials and/or the decision to include such information (if there are multiple documents, list any index of the documents and how and where stored).

(g) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC:

(a) and (b): Product catalogs would have been distributed to customers or potential customers of Haveg products.

(c) and (d): Refer to Product Catalogues File A49 in which loose sheets regarding Haveg Cement can be found. These sheets were attached to all Haveg cement, that is Cement 41F and Cement 61F.

Effective on January 17, 1973, all acknowledged copies of customer orders or mill orders for Haveg chemical equipment and Chemtite were sent with the following information sheet.

"HAVEG PROCESSING EQUIPMENT CONTAINS ASBESTOS ENCAPSULATED IN A BONDING AGENT WHICH PREVENTS THE DISPERSION OF ASBESTOS FIBERS. IF THIS PRODUCT IS MODIFIED, E.G. BY SAWING, GRINDING OR DRILLING, IT IS POSSIBLE THAT AIRBORNE DUST WOULD BE GENERATED. IN THIS REGARD, YOUR ATTENTION IS DIRECTED TO PART 1910 OF TITLE 29 OF THE CODE OF FEDERAL OCCUPATIONAL FEDERAL REGULATIONS, SECTION 1910.1001 OF THE OCCUPATIONAL SAFETY AND HEALTH ACT OF 1970, WHICH REGULATION PRESCRIBES METHODS AND PROCEDURES FOR THE PROTECTION OF WORKMEN."

Effective 2/14/77 the information sheet above, with the exact wording typed in red ink was applied to every piece of Haveg and Chemtite products in the form of a pressure-sensitive label. Material Safety Data Sheets are contained in C70 and were distributed to customers upon request.

Warning tags and labels are found in File C65.

(e) The identity of those individuals presently known who assisted in the wording of any warning labels, including the pressure sensitive label, are as follows: Emil Christofano, Edmund Painter and Dudley Barton. There may have been other individuals who assisted from Hercules' legal department, such as Edward Wolper.

Refer also to the deposition of Dudley Barton dated  
2/1/83.

12. For each product identified in answer to Interrogatory 1, state whether warnings or any harmful or potentially harmful effects of the product were printed on the cartons or packing cases in which individual containers were packed and if so:

- (a) State the printed warning's contents;
- (b) State when the warning was used;
- (c) Describe the manner in which it was placed on or in the product container;
- (d) Identify each individual who participated in writing of the label or brochure and describe in detail the extent of his participation;
- (e) Identify each document which reflects, refers or relates to the information contained on the cartons or packing cases and the decision to include that information;
- (f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: Refer to the answer to Interrogatory No. 11.

13. With regard to the production, distribution and/or sale of each product identified in answer to Interrogatory 1, state whether you have ever been accused of violating any of the provisions of the Federal Labeling of Hazardous Substances Act, OSHA (P.L. 91-596, 29 U.S.C. Section 651 et seq and regulations promulgated thereunder or NIOSH and its regulations and, if so, state:

- (a) The date of each indictment, complaint or information that accused you of such violation;
- (b) The court in which the proceedings were instituted;
- (c) The plea you entered;
- (d) The verdict and/or judgment in each such case;
- (e) The date set for trial of any pending case;
- (f) Identify each document which reflects, refers or relates to information pertaining to such accusation;
- (g) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Neither defendant has been cited for any violations for labeling in relation to Haveg products.

14. For each product identified in answer to Interrogatory 1, state whether you contend it is a "hazardous substance" as defined in 15 United States Code, Section 1261(f) and, if so, state with specificity and particularity the facts which you rely on to support the contention.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that the reference, 15 U.S.C.A. §1261(f) is misleading and is not relevant to the issues in the present action. It is part of the consumer safety act in reference to that code section which deals with the protection of users and consumers. No reference in that section is made to employees.

15. With regard to each product identified in answer to Interrogatory 1, state whether any quantity of that product has ever been seized by any agency of any government because of its containing a toxic ingredient and not having a proper label or required instructions for use; and if so,

- (a) State the date of each such occurrence;
- (b) State the name or description of the violations of which you were accused;
- (c) State the court in which the action was filed;
- (d) Describe the judgment that was rendered;
- (e) State the date that has been set for trial of any pending case;
- (f) Identify each document which reflects, refers or relates to information pertaining to such seizure;
- (g) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: To the best of defendants' knowledge, no product manufactured at the Haveg Marshallton plant has ever been seized by any government agency.

16. State what action and when it was undertaken, if any, you have taken since 1935 to reduce or eliminate any risk of occupational disease or personal injury to those using your asbestos containing products which arises from the inhalation of dust and fibers.

ANSWER OF HERCULES AND CCC: The portion of the interrogatory relating to the use of asbestos products is objected to on the basis that it is not relevant to any of the issues involved in this case as related to these defendants and the bases of the actions against them, irrelevant to the plaintiffs involved in this matter and is not calculated to lead to the discovery of any further relevant or admissible evidence. However, in an effort to be responsive, the following measures were taken at the Haveg plant to reduce or eliminate the risk of occupational disease or personal injury to those employed in the manufacture of asbestos products. They are as follows: mask and respirators, ventilation system, dust collecting system, and vacuum system, change rooms, encouraged non-smoking, films and brochures regarding asbestos and smoking, safety meetings (education of employees), health evaluations and programs and medical treatment made available through the company, issuance of protective clothing, issuance of warning to employees who violated the safety procedures and the placing of warning signs throughout the Marshallton plant, isolation and enclosure of certain areas of the plant and the monitoring of the air.

Refer to files C1, 4-11, 19, 23, 27-28, 30, 32, 34, 36, 39-45, 48, 50-55, 58-62, 69, 71, 72, 75, 76. In addition, air monitoring records were maintained since 1972 and can be found in files B1-24, 26.

For further explanation of safety measures taken, refer to the depositions of Robert Good 2/3/83, Leon DeBrabander, John Ward 2/1/83, Martha Vogler (safety) (plant nurse) 8/3/82, Dudley Barton 9/15/82 and 2/1/83, Clare Deptula (plant nurse) 10/5/83, Elizabeth Elliott (plant nurse) 10/5/83, Barbara Genereaux (plant nurse) 2/2/83, Elizabeth Tull (plaintiff and personnel manager) 2/1/83.

17. Describe in full and complete detail each of the activities which you have undertaken with the intention of warning the public of the effects of any product identified in answer to Interrogatory 1 as to the health of the user or general public and give the inclusive dates of each such activity, and:

(a) Identify each individual who participated therein and describe the nature of his participation;

(b) Identify each document which reflects, refers to or relates to information pertaining to such warning;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that it is irrelevant to the plaintiffs in this matter, irrelevant to the issues involved in this case and is not calculated to lead to the discovery of any further relevant or admissible evidence. However, in an attempt to be responsive and not waiving the objections raised, refer to the answer to Interrogatory No. 11. In so responding to this interrogatory, defendants are not referring to workers or employees.

18. Have you or any of your subsidiaries or corporate predecessors (defendant) conducted or contracted to have any entity conduct studies concerning the effects of inhalation of asbestos dust or fibers on a person using or being exposed to any of the asbestos materials manufactured by "defendant"? In answer to this question, please state:

- (a) The date, nature and location of the studies;
- (b) The name or names of the persons conducting the studies and their address and describe in detail the extent of their participation;
- (c) The purpose of the studies;
- (d) The identity of each document which refers or relates to any information set forth in answer to this interrogatory;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: None known presently. However, air monitoring studies at other Hercules plants were analyzed at the

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that it is irrelevant to the plaintiffs in this matter, irrelevant to the issues involved in this case and is not calculated to lead to the discovery of any further relevant or admissible evidence. However, in an attempt to be responsive and not waiving the objections raised, refer to the answer to Interrogatory No. 11. In so responding to this interrogatory, defendants are not referring to workers or employees.

18. Have you or any of your subsidiaries or corporate predecessors (defendant) conducted or contracted to have any entity conduct studies concerning the effects of inhalation of asbestos dust or fibers on a person using or being exposed to any of the asbestos materials manufactured by "defendant"? In answer to this question, please state:

(a) The date, nature and location of the studies;  
(b) The name or names of the persons conducting the studies and their address and describe in detail the extent of their participation;

(c) The purpose of the studies;  
(d) The identity of each document which refers or relates to any information set forth in answer to this interrogatory;

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: None known presently. However, air monitoring studies at other Hercules plants were analyzed at the

Marshallton plant. In addition, air monitoring studies were analyzed at the Marshallton plant on behalf of defendant Herty. Information concerning these studies may be found at files B25, D3-12.

19. Has the answering defendant (see definition in No. 18) conducted any studies designated to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of any of the products containing asbestos materials manufactured by it? If so:

- (a) The date, nature and location of your studies.
- (b) The name or names of the persons conducting such studies and their address and describe in detail the extent of this participation;
- (c) State what action, if any, was taken based upon such studies in an effort to minimize or eliminate the effects of inhalation of asbestos dust or fibers upon those using or being exposed to the dust and fibers contained in such products as manufactured by your company;
- (d) Identify each document which refers or relates to any information set forth in answer to this interrogatory.
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: The wording of this interrogatory suggests studies done for the benefit of customers. None were done by Hercules or CCC for that purpose, nor were any requested. However, air monitoring, warnings and other safety measures were done and instituted at the Haveg Marshallton plant.

20. What technique, if any, did and/or do you use to make dust samplings in the manufacturing and packaging production environment or at job sites where your materials have been used?

- (a) Set forth in detail the technique used, when it was commenced and when, if ever, it was concluded;
- (b) State the purpose for administering such samplings;

- (c) State the results of such samplings;
- (d) State what action, if any, has been taken in response to the findings as to the dust samples;
- (e) Identify each document which refers or relates to such sampling;
- (f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.
- (g) Identify the living person who has the most knowledge of matters discussed herein.

ANSWER OF HERCULES AND CCC: Refer to the answer to Interrogatories No. 16 and 19 and File in B. To the best of these defendants' knowledge, any studies by these defendants were not done at job sites where Haveg asbestos containing products were used.

21. State what, if any safety measures were taken since 1935 by defendant with regard to its employees, during the processing, manufacturing and packaging of products containing asbestos which relate to dust abatement or elimination of the discharge into the work environment of asbestos particles. If any such safety measures were taken, state:

- (a) The reason for the use of such measures, equipment or clothing;
- (b) The date of implementation of safety measures;
- (c) Identify each document relating to safety procedres taken by employees or plant personnel in the manufacture, processing and packaging of such products;
- (d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information.

ANSWER OF HERCULES AND CCC: Refer to the answers to Interrogator ies No. 16 and 19. Those individuals who provided information in responding to this interrogatory, in addition to those individuals whose depositions are referred to in the answer to

Interrogatory No. 16, Edward Painter, Drs. Flanders, Heckler and Reed, and Emil Christofano.

22. State for the period of time the answering defendant manufactured or used at its own plants asbestos containing products the following:

(a) Knowledge as to any respirator or other breathing device which was on the market during the relevant period which would prevent the inhalation of asbestos dust and fibers;

(b) A detailed description of such respirator or other breathing device, together with all information as to how such device prevents the inhalation of asbestos dust and fibers.

(c) What tests, if any, were conducted, by whom and where, with regard to the effectiveness of any such device;

(d) Identify each document in any defendant's possession which refers or relates to the subject matter of this interrogatory.

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Refer to files A1, C1-3, 6-11, 16, 19, 23, 25, 28, 30, 34, 36, 41, 43-44, 50, 53, 58-62, 76. Robert Good is believed to be the individual having the most knowledge regarding the respirators used at Marshallton, and reference should be made to his deposition. In addition, other individuals having knowledge regarding respirators are Dudley Barton, John Ward, Emil Christofano, Edmund Painter, Eugene O'Neill and Leon DeBrabander.

23. Has the "defendant" or any entity (including associations to which the defendant is or has been a member) conducted or had conducted any investigation of the statistical and/or epidemiological relationship between the use of any product identified in answer to Interrogatory 1 and the contraction by humans or animals of cancer including but not limited to mesothelioma. If so:

- (a) Identify each person participating in such investigation and describe in detail the extent of this participation;
- (b) State when the investigation was conducted;
- (c) Identify the person or persons who authorized the investigation;
- (d) Identify each document which refers or relates to any information set forth in answer to this interrogatory;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF CCC: To the best of defendant CCC's knowledge, no formal investigation was conducted by this defendant. However, safety measures were instituted at the Haveg plant and health records of its employees were maintained. Refer to the answer to Interrogatory No. 16.

24. Has the "defendant" or any entity (including associations to which the "defendant" is or has been a member) conducted or had conducted any investigation of the statistical and/or epidemiological relationship between the use of any product identified in answer to Interrogatory 1 and the contraction by humans of pulmonary asbestosis. If so:

- (a) Identify each person participating in such investigation and describe in detail the extent of his participation;
- (b) State when the investigation was conducted;
- (c) Identify the person or persons who authorized the investigation;
- (d) Identify each document which refers or relates to any information set forth in answer to this interrogatory;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF CCC: None presently known.

25. If the answering defendant did not respond affirmatively to interrogatory 1, but undertook the types of

inquiries indicated in interrogatories 23 and 24, answer said interrogatories under this question, including all subparts.

ANSWER OF HERCULES AND CCC: These answering defendants did respond to Interrogatory No. 1, but have no idea what information is being requested in Interrogatory No. 25.

26. Describe in detail all written and oral reports including those reports concerning users of any of the products identified in answer to Interrogatory 1, including doctors, insurance companies, employees and agents of the defendants concerning any relationship between the use of these products and the development of pulmonary asbestosis in humans or animals;

(a) Identify all persons making said reports and to whom said reports were made;

(b) State whether any report or series of reports initiated changes and/or reevaluation of the production, sale or use, or recommendations for sue, of any of those products;

(c) Identify each document which refers or relates to any information set forth in answer to this interrogatory.

(d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: None except the information contained in Files A16, 18, C57. Medical articles and newspaper articles are contained in files C66 and 68. Some information was forwarded to Marshallton by Hercules Medical or Hercules Safety department, such as changes in OSHA regulations found in files D14-15, 16-17, 20. It is believed that no such information was supplied to CCC by users of Haveg products. Refer also to the reports of Liberty Mutual and Employers of Wausau found in files C2-3.

Doctors employed by defendant CCC prepared lists of employees who had contracted asbestosis as contained in file C72 and the OSHA Logs, file 71.

27. Describe in detail all written and oral reports including those reports concerning users of any of the products identified in answer to Interrogatory 1, including doctors, employees and agents of the defendants concerning any relationship between the use of any of those products and the development of cancer including but not limited to mesothelioma in humans or animals:

- (a) Identify all persons making said reports and to whom said reports were made;
- (b) State whether any report or series of reports initiated changes and/or reevaluation of the production, sale or use, or recommendations for use, of any of those products;
- (c) Identify each document which refers or relates to any information set forth in answer to this interrogatory;
- (d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Refer to the answer to Interrogatory No. 26.

28. For each product identified in answer to Interrogatory 1, state whether the production and/or sale of the product has been discontinued, limited or curtailed, and, if so:

- (a) State when it was discontinued;
- (b) State with specificity and particularity all the reasons for the discontinuance.
- (c) Identify each individual who participated in the decision to discontinue production and/or sale and describe in detail the extent of his participation;
- (d) Identify all documents which reflect, refer or relate to each such discontinuance;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that it is overly burdensome to determine when each and every Haveg product containing asbestos was discontinued and specific dates. The invoices and supplier information already produced for plaintiffs found in files A1-57, A2-58-77 and the depositions taken of former Haveg personnel and Hercules personnel indicate that asbestos was used at the plant, but removed entirely by the time of the sale to Ametek on October 8, 1980. Refer also to C54-55, files concerning the clean-up.

29. Do you contend that each of the products identified in Interrogatory 1 or 70 do not or did not create any health risk to one who applies or uses the product?

(a) If so, state the factual basis for each such contention;

(b) If not, state:

(i) The degree and kind of risk which is created by such use;

(ii) The conditions under which such risk is created, increased or decreased;

(iii) Identify each document which reflects, refers or relates to your answers to this interrogatory;

(iv) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: (a) These defendants do not presently contend that loose airborne asbestos does not cause any risk to one who uses or applies the product;

(b) Refer to the warning label information as contained in response to Interrogatory No. 11 and the documents already produced.

Asbestos products manufactured at Marshallton contained encapsulated asbestos. Potential for exposure to asbestos related conditions depended upon the amount of and type of alterations done to the finished product, the length, degree and extent of exposure, the safety protection devices used and also upon the working habits and conduct of the worker.

30. Do you contend that it was not your responsibility to warn the ultimate user listed in interrogatories 1 or 70 of any health risk related to products/asbestos?

- (a) State the factual basis for such response;
- (b) Identify each document which reflects, refers or relates to your answers to this interrogatory;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: This interrogatory is objected to since the exposure alleged was the result of employment at the Marshallton plant. Whether or not there was any responsibility to main users of Haveg products is not in issue as to those defendants and therefore is not relevant.

31. Do you contend that it was only the responsibility of the employing company involved, or entities other than the answering defendant, to so warn the workers of the health risks or harm to users health arising from the use of your product or of the danger of asbestos to their health?

- (a) State the basis for such contention;
- (b) Identify which others were so responsible;
- (c) Identify each document which reflects, refers or relates to your answer to this interrogatory;
- (d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: It is the position of these defendants that a responsibility existed on the part of suppliers and insurers to provide warnings. Hercules was in an advisory or consultant capacity only when and if information was requested. For the factual bases, refer to the depositions of Dr. Frawley, Reed, Flanders and Heckler, John Ward, Dudley Barton and Robert Good.

32. Do you contend that the health danger to any plaintiff was not foreseeable by the answering defendant at the time the products alleged to have caused plaintiff's injuries were sold? If so, as to each plaintiff:

- (a) State the factual basis for such contention;
- (b) Identify each document relied upon in support of such contention;
- (c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Plaintiffs were made aware of the risks and dangers to asbestos exposure at Haveg Marshallton. Plaintiffs were also advised of the potential hazards by the physicians employed at Haveg Marshallton, the plant nurses, and by the administration. Refer to plaintiffs' medical, employment and personnel files, files C4-5, 7-11, 16, 19, 23, 25, 28, 30, 34, 36 that deal with the safety committee minutes which were posted, 39 (dealing with employee suggestions), 41 (dealing with safety talks), 42 (safety memos), 43 (safety programs), 44 (safety rules), 49 (OSHA folders), 5 (asbestos booklets,

pamphlets and movies which were distributed and shown throughout the plant and 51 (chest x-ray program memos), 52 (physical examinations and memos), 58-62 (memos and warnings to employees), 69 (physical exam and x-ray procedure manual), 71 (OSHA logs which were posted and 76 (films), the depositions of Barbara Generaux (plant nurse), Robert Good, Dr. Howard Reed, Clare Deptula, Elizabeth Elliott, Martha Vogler, Dudley Barton and John Ward regarding the advice and information orally provided.

33. Do you contend that the health consequences to each plaintiff from the use by each plaintiff of products containing asbestos was obvious? If so, as to each plaintiff:

(a) State the factual basis for such contention;

(b) Identify all documents relied upon in support of such contention;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Plaintiffs were made aware of the risks and dangers to asbestos exposure by Haveg. Plaintiffs were also advised of the potential hazards by the physicians employed by Haveg, the plant nurses, and by the administration. Refer to the answer to Interrogatory No. 32.

34. Do you contend that each plaintiff knew, understood and appreciated the danger to his/her health arising from his contact with asbestos products which the answering defendant mined, distributed, manufactured or allowed to be used within their production facilities? If so, as to each plaintiff:

(a) State the factual basis for such contention;

(b) Identify each document relied upon in support of such contention;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Plaintiffs were made aware of the risks and dangers to asbestos exposure by Haveg. Plaintiffs were also advised of the potential hazards by the physician employed by Haveg, the plant nurses, and by the administration. Refer to the answer to Interrogatory No. 32.

35. Do you contend that plaintiff unreasonably exposed himself to the danger arising from his contact with asbestos products which the answering defendant mined, distributed, manufactured or allowed to be used within the confines of a facility of the answering defendant? If so, as to each plaintiff:

(a) State the factual basis for such contention;

(b) Identify each document relied upon in support of such contention;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Plaintiffs were made aware of the risks and dangers to asbestos exposure to Haveg. Plaintiffs were also advised of the potential hazards by the physicians employed by Haveg, the plant nurses, and by the administration. Refer to the answer to Interrogatory No. 32. After receiving such warnings as indicated above and having the information noted, failure to follow the procedures recommended by their employer would be unreasonable.

36. Do you contend that plaintiffs used any asbestos product in other than their usual, customary and expected manner? If so, as to each plaintiff:

(a) State the name and chemical composition of the product claimed to have been used in other than its usual, customary and expected manner;

(b) State in detail the manner in which plaintiffs used said product in other than its usual, customary and expected manner;

(c) Identify each document relied upon in support of such contention;

(d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Hercules did not manufacture asbestos products. Haveg products manufactured contained asbestos (chemical equipment and cement). Plaintiff-employees did not use said products, but were employed in the manufacture, production and processing of said products. Plaintiff-spouses, to the best of defendants' present knowledge, never used or came in direct contact with the products made at Marshallton.

37. Has the answering defendant ever been named as a defendant in a proceeding including any other civil action, Workmen's Compensation actions, filing of Workmen's Compensation consent agreements, or other proceedings, to recover damages for injuries resulting from any accident or alleged occupational disease (including asbestosis, cancer, etc.) as a result of exposure at the complainant in such proceedings to asbestos from 1925 to 1975;

(a) State the name and address of each plaintiff;

(b) State the name and address of each co-defendant;

(c) State the date it was filed;

(d) State the name of the Court in which it was filed;

(e) Describe the judgment rendered;

(f) State the date that has been set for hearing or trial of any case still pending;

- (g) Describe the terms of any settlement reached before or during trial;
- (h) State whether any appeal is pending from any judgment that has been rendered;
- (i) State the exact nature of the condition alleged in such action to have resulted from the plaintiffs' use of or contact with said product and identify the product involved;
- (j) Identify each document which reflects, refers or relates to any information pertaining to that complaint.
- (k) State the first date any notice of the complainants' problems came to the attention of the answering defendant.
- (l) State whether any appeal is pending from any judgment that has been rendered.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to in that it refers to injuries received as a result of using products identified in Answer to Interrogatory No. 1. Plaintiffs in the instant action were involved in the manufacture of certain of these products, and not in their use.

By way of further objection, the only claims which are considered relevant are those filed against either defendant prior to October 8, 1980, the date of the sale of the Marshallton plant, since defendants believe the intent of this interrogatory is to establish knowledge of alleged injuries due to exposure to asbestos or asbestos-containing products. Without waiving the objection, refer to Exhibit B.

38. With respect to the period from 1940 through 1980, state the names, addresses and company title of position of each person who at any time during that period was in charge of the following activities with regard to each of the products identified in answer to Interrogatory 1:

- (a) Production;
- (b) Marketing;

- (c) Labeling;
- (d) Advertising;
- (e) Product evaluation;
- (f) Research and development;
- (g) Distribution.

ANSWER OF CCC: This interrogatory is difficult to answer by the categories established by the plaintiffs. However, in an attempt to be responsive, the following individuals held the following titles related to the activities contained in this interrogatory:

(a) Plant Manager or General Manager, whose responsibilities would include some degree of involvement in and final responsibility for all of the activities contained in this interrogatory: P.L. McWhorter (deceased), 1950-1960; J.V. Norris (deceased), approximately 1951-1960; J.M. Ward, 1962-1976; H. Dudley Barton, 1976-present; G.P. Lynam (prod. superintendent, then plant manager), 1952-1954; G.L. Squire (plant manager), 1976-10/80.

(b) Superintendent or manufacturing manager, whose responsibilities would include production activities: R.W. Laird (superintendent), 1950-1952; E. Bryden, 3/64-12/70; J.W. Cregg, 12/70-6/73; E.G. McDowell, 3/75 to present.

(c) There was no one person in charge of labeling. Explained in the deposition of Dudley Barton and answer to Interrogatory No. 11 was the development of warning or safety labels. Regarding any other labels or brochures pertaining to the properties and uses of the products themselves, it is presently unknown who would have been "in charge" of that activity.

(d) Regarding advertising, this is presently unknown.

(e) and (f) Leon DeBrabander.

ANSWER OF HERCULES: (a) None

(b) None;

(c) Refer to the answer to Interrogatory No. 11 and the deposition of Dudley Barton regarding preparation of warning labels;

(d) Refer to Exhibit A;

(e) and (f) There was no person presently known to Hercules who would have been "in charge" of these activities as related to Haveg products.

39. Identify the living parties or persons who are the most knowledgeable about asbestos mined and products containing asbestos sold and/or distributed by you from 1940 to present. Identify all documents which relate to such sales and/or distribution.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to on the following bases: the action against defendants is by employees and their spouses related to exposure in the workplace. No claim has been raised outside this relationship on or based upon exposure to products after sold or distributed. Neither defendant has been sued in the capacity of a supplier or distributor. The information requested is not relevant to the issues involved, nor calculated to lead to the discovery of further relevant or admissible evidence.

40. Has the answering defendant or has anyone on its behalf attended and/or participated in any conference, seminar, lecture of symposium dealing with the health hazards of using any product identified in answer to Interrogatory 1 or 7 or of asbestos in general and, if so, state:

(a) The date and place of such conference, seminar, lecture or symposium;

(b) The person or persons conduction such conference, seminar, lecture or symposium;

(c) The person or persons who attended on your behalf;

(d) The subject matter of such conference, seminar, lecture or symposium;

(e) The speakers and/or moderators at such conference, seminar, lecture or symposium;

(f) Whether any reports or memoranda were made concerning the subject matter of such conference, seminar, lecture or symposium; identifying each such report or memorandum.  
ANSWER OF CCC: From the information presently available, refer to the deposition of Robert Good regarding the seminars or conferences that he attended. It is believed that Mr. Good attended two AIA meetings in Arlington, VA, in either 1977 or 1979 or possibly one in each year. He also attended a conference in New York City sponsored by the New York Academy of Science in either 1978 or 1979. It is believed that Leon DeBrabander and technicians within his department (Laboratory) attended the NIOSH training seminar or conference in the late 60's or early 70's to be educated and trained in the method of measuring dust counts. Refer to his depositions.

In February 1979, Ed Painter attended a NIOSH seminar in Cincinnati, Ohio dealing with the sampling and evaluation of airborne asbestos.

No presently known formal memoranda or reports were made regarding those conferences; however, the information learned were included in the safety policies and procedures at Marshallton. Information learned from those seminars or conferences would be contained in files B1-26.

ANSWER OF HERCULES: Refer to the deposition of Dr. Flanders pertaining to the conferences or seminars he attended.

It is believed that Dr. Heckler attended the annual meetings of the American Occupational Medical Association, at which asbestos and asbestos related conditions may have been discussed. He also attended the annual meetins of the Academy of Occupational Medicine in alternate years beginning in 1975, at which asbestos and asbestos related conditions may have been discussed. Dr. Heckler attended the International Chest Disease Conference in 1979 that did deal with asbestos. Refer to his deposition.

41. Is the answering defendant, any association it belonged to or any carrier that it had asbestos product liability with, submit to make a statement at the hearing concerning the dangers of asbestos conducted in March, 1967 before the House of Representatives of the United State Congress Sub-Committee on Labor? If so, identify those persons who are or were associated with you that participated, and identify any writing concerning said participation.

ANSWER OF HERCULES AND CCC: Without more specific information to identify the hearing, defendants Hercules and CCC are unable to form a response to this Interrogatory. At present, neither defendant has any knowledge.

42. State when, if at all, answering defendant received knowledge of the following publications or matters discussed therein, who received such knowledge and identify all documents relating to such knowledge:

(a) Fleischer, Viles, Gade and Drinker, "A Health Survey of Pipe-Covering Operations in Construction Naval Vessels," 28 J. Indus. Hyg. 9-16.

- (b) Selikoff, et al., "Asbestosis and Neoplasia," 42 Am. J. Med. (1967);
- (c) Selikoff, Churg and Hammon, "The Occurrence of Asbestosis Among Industrial Insulation Workers," 132 An.. New York Acad. Sc. 139 (1965);
- (d) "Documentation of the Threshold Limit Vlaues for Substances in Workroom Air," A.C.G.I.H. (3rd 1971);
- (e) "Threshold Limit Values for 1961," A.C.G.I.H. (1961).
- (f) 1906 report by Dr. H. Montague Murray.
- (g) 1934 study by Dr. Anthony J. Lanza, Assistant Medical Director of Metropolitan Life Insurance Company.

ANSWER OF HERCULES: Hercules has no present knowledge of receiving publications (a)-(c) and (e). Hercules does have a copy of (d). Date received is believed to be around the date of publication and contained in Hercules Medical Library.

ANSWER OF CCC: CCC has no specific recollection of these particular publications. Information regarding publications contained in (d) and (e) may be contained in any files found in Box C.

43. Identify each publication contained in your research library, or otherwise in your custody, including but not by way of limitation, your Research and Development Center, all medical journals, industrial medical journals, industrial hygiene journals, technical literature in the area of asbestos mining, manufacture, application and use, and Governmental publications, dealing with occupational diseases arising from the manufacture and use of asbestos-containing products. As to all such publications, state the volumes which are in your custody and control, when each such volume was received and the present location of such publications.

ANSWER OF HERCULES: Refer to Exhibit C. Defendant Hercules is unable to state when the publications identified in Exhibit C

were received. The publications are located in Hercules' Medical Library.

ANSWER OF CCC: Haveg did not maintain a medical or research library. Any such publications presently known that were received by CCC which were retained have been produced.

44. As to any threshold limit values published by the American Conference of Governmental Industrial Hygienists, state whether you have brought such information to the attention of those using your products or asbestos products on your premises. (If yes, how?) If you have not done so, state the reasons why you have not done so.

ANSWER OF HERCULES: Defendant Hercules is not aware of informing CCC's customers of threshold limit values published by the A.C.G.I.H. Contacts with customers were made by CCC's employees.

ANSWER OF CCC: This defendant at present is unable to state whether or not such matters were orally discussed with its many customers over the relevant time period of this litigation. However, this defendant has no evidence and documentation that such levels were discussed with customers.

45. Has answering defendant or any of its employees been: (a) a member of or (b) affiliated in any manner with or (c) received reports or (d) subscribed for reports or publications to the Industrial Hygiene Foundation organized in Pittsburgh, Pennsylvania?

ANSWER OF CCC AND HERCULES: (a), (b) and (d): No, to the best of these defendants' knowledge. With regard to (c), reports or publications of the Industrial Hygiene Foundation may have been received from time to time.

46. With regard to Interrogatory 45, what years did answering defendant or its employee(s) participate under (a), (b), (c) or (d)?

ANSWER OF HERCULES AND CCC: See answer to Interrogatory No.

45.

47. With regard to Interrogatory 45, do you have any documents obtained from the Industrial Hygiene Foundation? If so:

- (a) List all such documents;
- (b) Who currently has them in their possession?
- (c) When was each received?
- (d) State the name of the individuals who received such documents or information contained in such documents.

ANSWER OF HERCULES AND CCC: To the best of these defendants' knowledge, neither has any such documents in their possession. If any such reports or publications were received by employees of CCC or Hercules, such documents were not retained pursuant to Hercules' Record Retention Policy.

48. Have you received any reports or documents prepared by Metropolitan Life Insurance Company from 1929 to about 1960, concerning statistical and other studies of asbestos workers? If so, state:

- (a) The documents received;
- (b) Who received them and when;
- (c) The current location of the documents.

ANSWER OF CCC AND HERCULES: No, to the best of these defendants' present knowledge.

49. State all chemical, industrial, medical or trade associations to which you have belonged since 1936.

ANSWER OF HERCULES AND CCC: Contained in file D19 at Biggs & Battaglia for review.

50. With regard to the associations enumerated in the answer to Interrogatory 49, state:

(a) The names of each individual associated with the answer defendant since that date who have had dealings with each said association;

(b) Describe the nature of their dealings with each such association;

(c) State their last known address;

(d) If still employed, their current job and title.

(e) List all documents related to said affiliation.

ANSWER OF CCC AND HERCULES: Defendants object to this

interrogatory as overly broad, burdensome and not likely to lead to relevant and/or admissible evidence.

51. Name each corporate officer and/or member of corporate management who attended any meeting and/or conference concerning the health, safety or medical aspects of asbestos and/or the use of products containing asbestos, and for each person identified, state the nature of his participation in each such meeting or conference.

(a) If any papers were received or given by the individuals listed for answer to 51, list each such document and who has copies of them.

ANSWER OF CCC AND HERCULES: To the best of these defendants'

present knowledge, no corporate officer or member of corporate management attended any such meetings. For the purpose of responding to this interrogatory, these defendants consider corporate officers and corporate management as synonymous.

52. State the sources of all asbestos and/or asbestos containing products which have been incorporated in any product manufactured or distributed by answering defendant in its own facility (including installing on its equipment or buildings) or utilized from 1936 to 1980.

(a) State the names of all individuals associated with the above stated sources who dealt with or handled your account;

(b) Identify any such document which refers, reflects or relates to any information provided in answer to this interrogatory;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Hercules was not a purchaser of raw asbestos or asbestos material to be used in the manufacturing of any of Haveg products. As to CCC, the information regarding suppliers has been provided to plaintiffs by reference to Interrogatory No. 1 and Files A1-57, A2-58-77.

The individual at Marshallton who is most knowledgeable regarding suppliers was Paul Reynier. Dudley Barton and John Ward also have knowledge. Refer to their depositions. Contained in the files referring to suppliers are the names of those persons associated with the various suppliers who dealt with or handled the Marshallton account.

53. State the names of all individuals associated with you who had any dealings with the requisition and/or procurement of asbestos or products containing asbestos as indicated in answer to Interrogatory 52 and for each such person:

(a) Identify the nature of his association(s), the locations and the dates of their occurrence;

(b) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER OF HERCULES AND CCC: Refer to the answer to Interrogatory No. 52.

54. State the names of all individuals who dealt with or handled the account with and/or made any sales to the employers of the plaintiff of asbestos and/or products containing asbestos.

(a) Describe in detail the nature and dates of each such association with the said accounts;

(b) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory.

ANSWER OF HERCULES AND CCC: This interrogatory appears to be directed solely to suppliers to which no response is required. However, for such information, refer to files A1-57, A2-58-77.

55. Identify each individual whom you expect to call as an expert witness at the trial of this litigation, and for each person identified:

(a) The subject on which the expert is expected to testify and the substance of the facts and opinions to which he or she is expected to testify and a summary of the grounds for each opinion;

(b) Identify each document referring, relating or containing any such facts and/or opinions and identify each individual having custody of each document identified.

ANSWER OF HERCULES AND CCC: No experts have been retained for trial.

56. Identify each individual who you have retained or employed or anticipate retaining or employing in any way in preparation of or anticipation of trial in this litigation who is not expected to be called as a witness at trial, and for each such individual:

(a) State the substance of any facts or opinion which he or she has discussed with any agent, employee or representative of the answering defendant, together with a summary of the grounds for each opinion;

(b) Identify each document referring to or containing such facts and/or opinions, and identify each person having custody of each document identified.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to on the basis that it requests information beyond the scope of Superior Court Civil Rule 26(b)(4).

57. State the names, last known addresses and telephone numbers of each and every person whom you intend to call as a witness at the trial of this litigation.

(a) State the substance of any facts or opinion which he or she has discussed with any agent, employee or representative of the answering defendant, together with a summary of the grounds for each opinion;

(b) Identify each document referring to or containing such facts and/or opinions, and identify each person having custody of each document identified.

(c) Specify witnesses you intend to use at the trial of this case with respect to the occurrences and/or cause of plaintiffs' illnesses or with respect to the claimed damages or with respect to your liability.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to on the basis that it requests information beyond the scope of F.R.C.P. Civil Rule 26, including information subject to the attorney-client privilege and attorney work product.

Those persons whom defendants presently intend to call as witnesses at trial are those present and former Hercules and Haveg personnel and Ametek personnel who have been deposed and identified to date.

58. State whether your corporation is and has been insured for:

(a) product liability insurance, including "excess or umbrella" policies;

(b) Workmens' compensation

(c) For product liability coverage, state:

(i) If so, the limits of coverage;

(ii) The name of the insurance company;

(iii) Whether this claim has been accepted or whether a letter of intent to deny coverage has been received.  
ANSWER OF HERCULES AND CCC: Refer to Exhibit "D".

59. In whose possession are your and your predecessors' annual reports from 1936 to the present?

ANSWER OF CCC: The corporate minutes have been produced and are contained in files F1-24. The only available annual reports are from 1955-1963 in the possession of H. Dudley Barton.

ANSWER OF HERCULES: From 1964 to 1980, the Hercules Annual reports are in the office of the Secretary for Hercules Incorporated, available for inspection at Hercules.

60. Describe in detail your policy with respect to the destruction of records pertaining to each of the products identified in answer to Interrogatory 1.

(a) Identify all documents pertaining to your policy, if any, regarding the destruction of such records;

(b) Identify the person or persons having custody of such policy documents;

(c) Identify the person or persons in charge of destroying records pertaining to each such product;

(d) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory.

(e) Describe what steps, if any, you have taken since the institution of this action or other actions involving asbestos to prevent the destruction of any documents relating to asbestos.

ANSWER OF HERCULES AND CCC: There was no known records retention or destruction program at Haveg Marshallton before Hercules' purchase of the plant. Retention and destruction of records depended upon the department or individual with whom the records were kept.

61. State the names of all individuals who aided in the preparation of these answers, and for each such person, state:  
(a) Which interrogatories they helped prepare or the particular subject area for which they supplied information.  
(b) Their current position with the company;  
(c) Their current or last known home and business address and phone numbers.

ANSWER OF HERCULES AND CCC: Dudley Barton, General Manager of Ametek, home address contained in his deposition;

Elizabeth Tull, Personnel Manager, Ametek, home address contained in her deposition;

Dr. Howard Reed, retired Medical Director of Hercules, address contained in his deposition;

Dr. James F. Flanders, retired Medical Director of Hercules, address contained in his deposition;

Dr. George B. Heckler, present Medical Director of Hercules, address contained in his deposition;

Emil Christofano, toxicologist employed at Hercules, work address: 900 Market Street, Wilmington, DE;

Robert Good, address and position contained in deposition;

Barbara Generaux, address and position contained in deposition;

Eugene O'Neill, address and position contained in deposition;

Leon DeBrabander, address and position contained in deposition;

Clare Deptula, address and position contained in deposition;

John Ward, address and position contained in deposition;

Harold Haney, retired, address and position contained in deposition;

Paul Graybeal, retired, address and position contained in deposition;

Martha Vogler, address and position contained in deposition.

62. State all processes used by plaintiff's employer, known to any defendant where asbestos was an ingredient.

ANSWER OF HERCULES AND CCC: Refer to the answer to Interrogatory No. 1.

63. State all use of asbestos insulation by plaintiff's employer, known to any defendant.

- (a) Types of asbestos insulation used;
- (b) Manufacturer and/or brand names;
- (c) Locations in said plants where said insulation was used;
- (d) The person most knowledgeable in said corporation about the purchasing of insulation by distributors that covered the states of New Jersey, Delaware Pennsylvania and Maryland.

ANSWER OF HERCULES AND CCC: Not applicable to these defendants.

The only information available is contained in file A2-62.

64. State whether you have entered into any agreement, either oral or written, with any other defendant in this action regarding:

- (1) Settlement or non-settlement and/or
- (2) allocation of damages, should the plaintiffs prevail on liability.

If the answer is yes to either of the above, state the substance

of each such agreement and such parties who have entered into this agreement:

(a) Identify those persons who participated in the preparation of each such agreement and describe in detail the nature and extent of his participation; and

(b) Identify each document which contains, refers or relates to each such agreement.

ANSWER OF HERCULES AND CCC: This interrogatory is objected to on the basis that it requests information not relevant to the issues in this matter. However, without waiving this objection, the answer is no, except for the indemnification provisions in the contract of sale to Ametek.

65. Do you or your attorneys know of any person or persons not listed in the preceding answers having knowledge of facts relevant to the allegations in this lawsuit including witnesses to the accident, injury, illnesses, etc. in question? If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you, the present whereabouts of all such persons, and which of said persons you intend to produce as witnesses in the trial of this action.

ANSWER OF HERCULES AND CCC: Those individuals who may have knowledge include any family members of plaintiffs, the physicians who performed examinations at the Marshallton plant (Dr. Renzulli, Joseph F. Kestner, M.D., Parviz Sorouri, M.D., Roger Thomas, M.D.), treating physicians of plaintiffs as contained in their medical records, and co-workers of plaintiffs. At present, defendants would expect to call any and all treating physicians of plaintiffs.

66. Do you or your attorneys have any written statements from any persons having knowledge of facts relevant to the subject matter of this lawsuit, including witnesses to the

accident, injury, illnesses, etc. in question? If yes, please state the names, addresses, home telephone numbers, places of employment, relationship to you and the present whereabouts of all such persons.

ANSWER OF HERCULES AND CCC: None presently known, except for the depositions presently taken to date.

67. State whether you were a member of the Asbestos Information Association (A.I.A.) or in any manner received information or participated in any of the association's activities.

ANSWER OF HERCULES AND CCC: Neither defendant was a member of the Asbestos Information Association. Haveg Industries, Inc. did receive copies of this organization's monthly newsletter. The originals of thhse newsletters are contained in File A50 and have been provided to plaintiffs' counsel. As an approximation, it is believed Haveg Industries, Inc. received copies of the A.I.A. Newsletter from 1976 to 1980.

According to the deposition of Robert Good while in the employ of Haveg, it is believed that Mr. Good attended some A.I.A. meetings in Arlington, VA in either 1977 or 1978 or possibly one in each year.

68. If your answer to any part of Interrogatory No. 67 is in the affirmative, please state:

(a) The date, times and places of any A.I.A. meetings attended.

(b) The date and time period during which you received any publication of the A.I.A.

(c) The name, address and telephone number of each and every person who attended such meetings and to whom any such publications were sent.

(d) The nature of the information that was furnished at meetings or in such publications.

(e) Name, address and telephone number of the present or last known custodian of any copies of A.I.A. newsletters, correspondence or publications.

ANSWER OF HERCULES AND CCC: Refer to the answer to Interrogatory No. 67.

69. If answering defendant or any of its agents or employees received Asbestos Magazine, please state:

(a) The date and time periods during which you received such publication.

(b) The frequency of receipt, e.g., regularly, occasionally, rarely, etc.

(c) The terms, circumstances or requirements of receipt of such publication, e.g., free, by subscription, distributed at meetings, etc.

(d) Name, address and telephone number of the present or last known custodian of any copies of such magazine.

ANSWER OF HERCULES: To the best of defendant's knowledge, this magazine was not a publication received directly by Hercules.

ANSWER OF CCC: This publication was received at the Marshallton plant through subscription on a monthly basis from 1973-1981.

Copies of these magazines were in the custody of Dudley Barton at the time litigation was instituted. Copies of magazines available have been produced and are contained in File A-3.

70. Does the answering defendant have in its possession any medical records, not previously produced in this case relating to any of the plaintiffs, including, but not limited to, charts, x-rays, physical examination reports, summaries, tape recordings of interviews and any and all other records pertaining to the medical condition of the plaintiffs? If so, plaintiffs request that such records be produced in accordance with Rule 34.

ANSWER OF HERCULES AND CCC: None presently known.

71. With respect to each denial and affirmative defense contained in your response to the Complaint, state the following:

- (a) Identify which defense it relates to;
- (b) Each fact upon which your contention is based;
- (c) The names and present or last known addresses and present or last known employer of all persons having knowledge of any of the facts set out in answer to subparagraph (b) hereof;
- (d) The description or designation of each document which in any way reflects, relates or refers to any of the facts set out in answer to subparagraph (b) hereof.

ANSWER: To be provided.

72. Describe in detail, with specificity and particularity each product which was being installed, repaired, removed or otherwise used on the answering defendant's premises at all relevant times which contained asbestos, and for each such product describe:

- (a) Its chemical ingredients;
- (b) For each ingredient contained therein state:
  - (i) The name or chemical composition of each substance, what harmful effect, if any are known, that it produces in man or mammals and whether it produces its harmful effects through ingestion, inhalation, absorption or a combination of these;
  - (ii) When you determined and/or learned that the substance produced harmful effects and how such effects were produced;
  - (iii) Identify each individual who participated in such determination and/or obtained such knowledge;
  - (iv) Identify each document that refers, reflects or relates to any information pertaining to the properties of each of the ingredients and/or how the harmful effects are produced as well as your determination of those toxic effects and the manner by which they are produced;
  - (v) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied;
- (c) Whether any of these products were mined, manufactured or distributed by answering defendant;
- (d) The location within defendants' premises where said product was being installed, repaired or removed.

ANSWER: To be provided.

73. Provide the information requested in Interrogatory No. 2 for products listed in No. 72.

ANSWER: To be provided.

74. For each product identified in answer to Interrogatory No. 72, identify:

(a) The general contractor on the project which was responsible for or participated in the installation, repair or removal of said product;

(b) Any subcontractor or other contractor which was responsible for or participated in the installation, repair or removal of said product; and state:

(i) The type of agreement under which each named contractor was responsible for or participated in such installation, repair or removal (e.g. subcontractor, independent subcontractor);

(ii) The extent of each named contractor's expressed responsibility or participation under said agreement.

(c) Any other person, firm or entity who was responsible for or participated in the installation, repair or removal of said products;

(d) Each document which refers, reflects or pertains to any information provided in the answer to this interrogatory;

(e) As to any information received orally in answer to this interrogatory, identify each person who has supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

75. Identify any supervisory personnel of answering defendant or the entity performing the functions enumerated in Interrogatory No. 72 who were present during some or all of the installation, repair or removal of the products identified in answer to Interrogatory Number 72, and for each such person, state:

(a) The name of the person, firm or other entity who had the authority to hire him/her;

(b) The name of the person, firm or other entity who had the authority to fire him/her;

(c) The name of the person, firm or other entity who actually paid his/her wages;

(d) The name of the person, firm or other entity who had control over his/her day to day performance.

ANSWER: To be provided.

76. Identify each and every worker on any job site who participated in the installation, of the products identified in answer to Interrogatory No. 72, at all relevant times, and for each such person, state:  
(a) His job title at the job site;  
(b) His duties at the job site;  
(c) The local union to which he belongs, if any;  
(d) The name of the person, firm or other entity that had the authority to:  
(i) Hire him/her;  
(ii) Fire him/her;  
(iii) Pay his/her wages;  
(iv) Control his/her day to day activities on the job.

ANSWER: To be provided.

77. For each product identified in answer to Interrogatory No. 72, state what person, firm or other entity obtained said product or participated in providing said product to the job site?  
(a) How was the product purchased or otherwise acquired, before being distributed for use on the job site?

ANSWER: To be provided.

78. For each product identified in answer to Interrogatory Number 72 state:  
(a) What person, firm or other entity obtained said product;  
(b) Where it was purchased, and/or obtained;  
(c) From whom it was purchased;  
(d) The dates it was purchased;  
(e) The manner in which it was received and distributed for use on the job site.

ANSWER: To be provided.

79. State whether asbestos products were being repaired or removed on answering defendant's premises at any relevant time in areas where electrical construction was required to work. If so, describe:  
(a) Whether and when answering defendant's premises were repaired or removed of these circumstances;

(b) Any action which defendant took to insure safety of such workers under these circumstances.

ANSWER: To be provided.

80. State what action, if any, you have taken since reduce or eliminate any risk of occupational disease or injury to those using asbestos products or to those in close proximity to those using such products while on your premises which arises from the inhalation of dust and fibers.

ANSWER: To be provided.

81. Describe in full and complete detail each of the activities which you have undertaken with the intention of warning workers on your premises of the effects of any product identified in answer to Interrogatory 1 as to the health of the user or those in close proximity to the user and give the inclusive dates of each such activity, and

(a) Identify each individual who participated and describe the nature of his participation;

(b) Identify each document which reflects, reflects or relates to information pertaining to such warning;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

82. State what if any safety measures were taken by you to your employees, or other workers on your premises during the installation, repair or removal of products containing asbestos. If any such safety measures were taken, state:

(a) The reason for the use of such measures, equipment or clothing;

(b) Identify each document relating to safety procedures taken by such employee or workers;

(c) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

83. Describe in detail all written and oral reports including those reports originating from suppliers of any

products identified in answer to Interrogatory 72, including doctors, and employees and agents of the suppliers concerning the relationship between the use of or proximity to the use of such products and the development of asbestos related illnesses in humans or animals:

(a) Identify all persons making said reports and from whom said reports were made;

(b) State whether any report or series of reports initiated changes and/or re-evaluation of the use, or recommendations for use, of any of those products;

(c) Identify each document which refers or relates to any information set forth in answer to this interrogatory;

(d) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

84. For each product identified in answer to Interrogatory 72, state whether the product has been removed from any premises and equipment owned by answering defendant, and,

(a) State when it was removed;

(b) State with specificity and particularity all reasons for the removal;

(c) Identify each individual who participated in the decision to remove said product and describe in detail the nature of his participation;

(d) Identify all documents which reflect, refer to, or relate to each such discontinuance;

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

85. For each product identified in answer to Interrogatory 72, state whether the use of that product in any or all of the premises has been limited and/or curtailed, reduced or discontinued and, if so:

(a) Describe how it was so limited or curtailed or reduced;

(b) State when it was so limited, curtailed or reduced;

(c) State with specificity and particularity the reasons for the limitation, curtailment, or reduction

(d) Identify each individual who participated in the extent of his participation in the decision to so limit, or reduce production and/or sale;

(e) Identify each document which reflects, reflects, or relates to the limitation, curtailment or reduction and/or decision to implement the limitation, curtailment or reduction

(f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER: To be provided.

86. Identify the living parties or persons who are knowledgeable about the installation, repair or removal of asbestos products on your premises during the relevant dates.

ANSWER: To be provided.

87. State what person, entity or firm was responsible for determining whether asbestos containing products would be installed, repaired or removed from your premises during the relevant dates.

ANSWER: To be provided.

88. (a) Identify the dates of all sales of asbestos-containing products by answering defendant (or its alleged corporate predecessors as set forth in plaintiffs' complaints) to the railroad defendants in these cases (Amtr Penn Central Transportation Company and the Pennsylvania Railroad.)

(b) Identify all documents concerning such sales of these railroads.

ANSWER OF HERCULES AND CCC: No answer is required of these defendants.

89. Identify all documents concerning sale of asbestos-containing products by answering defendant to the railroad defendants and their predecessors to the railroad defendants:

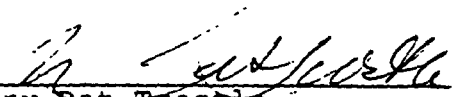
- (a) Wilmington, DE railroad shops;
- (b) Philadelphia, PA railroad shops.

ANSWER OF HERCULES AND CCC: No answer is required of these defendants.

90. (a) Describe below in detail each and every asbestos-containing product sold or manufactured by answer defendant or its alleged corporated predecessors as set forth in plaintiffs' complaints.

(b) Describe all similar products that were non-asbestos-containing.

ANSWER OF HERCULES AND CCC: No answer is required of these defendants.

  
Mary Pat Prostie  
Biggs & Battaglia  
1206 Mellon Bank Center  
P.O. Box 1489  
Wilmington, DE 19899  
Attorney for Defendants  
Hercules Incorporated and  
Champlain Cable Corporation

STATE OF DELAWARE:  
SS.  
NEW CASTLE COUNTY:

This is to certify that copies of the attached docu  
were mailed this 22<sup>nd</sup> day of May  
to the below-listed attorneys.

Keith K. O'Donoghue

SWORN TO AND SUBSCRIBED before me, a Notary  
Public, this 22<sup>nd</sup> day of May, 1986.

[Signature]  
Notary Public

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EXHIBIT A

Advertising - Asbestos Products (Prior to 10/9/80)

A. Agencies

1. Aloysius, Butler and Clark - Approximately May 1980 through October 8, 1980.
2. It is believed Hercules Incorporated Advertising Dept.- (From approximately 2/80 back to approximately 1969-1970) provided assistance.
3. Prior to the above, neither Haveg nor Hercules has any files to indicate any agencies involved.

B. Media Advertising

1. 8/80 through 10/80 - (proposed and assumed)
  - a. Chemical Engineering - August and October 1980;
  - b. Chemical Processing - September and October 1980;
  - c. Chemical Equipment - September 1980;
  - d. Consulting Engineer - October 1980;
  - e. Thomas Register - 1980 Edition.
2. Prior to 8/80 it is believed advertising divided between B.1 a, b and c plus Chemical Week. Neither defendant has file retention prior to this.

EXHIBIT B

RE: INTERROGATORY NO. 36

Workmen's Compensation Actions

Answer of Defendant CCC:

Refer to workmen's compensation claims produced in these actions, as well as the state court actions.

Answer of Defendant Hercules:

There have been no workmen's compensation actions against defendant Hercules with regard to use of products identified in answer to Interrogatory No. 1.

Civil Action

Answer of Defendant CCC: Subject to the objection and limitation contained in answer to Interrogatory No. 36, defendant Haveg has been named as defendant in the following civil actions: Quattrini v. Armstrong Cork Company, et al.

(a) Joseph Quattrini, 92 Wheaton Road, East Haven, Connecticut 06512;

(b) Co-defendants: Armstrong Cork Company; Amatex Corporation; Carey Canada; Celotex Corporation; Combustion Engineering, Inc.; Eagle-Picher Industries; Empire Ace Insulation Manufacturing Corp.; Fibreboard Corporation; Forty-Eight Insulation, Inc.; G.A.F. Corporation; Gale Corporation; Garlock Inc.; H.K. Porter & Co.; Haveg Industries, Inc.; J.P. Stevens Company, Inc.; Johns-Manville Sales Corporation; Nicolet, Inc.; Owens-Corning Fiberglass Corporation; Owens-Illinois, Inc.; Pittsburgh Corning Corporation; Rock Wool Manufacturing Co., Inc.; Southern Textile Corporation, Inc.; and Unarco Industries Inc.

Defendant does not have addresses for the co-defendants;

(c) and (d) Filed in the U.S. District Court, District of Connecticut, September 18, 1980;

(e) No judgment has been rendered;

(f) No date has been set for trial;

17  
ODE (g) This portion of Interrogatory No. 36 is objected to as beyond the scope of Rule 26(b);

FR (h) Not applicable;

ODE (i) Mesothelioma; plaintiff claims he came in contact with the following Haveg products: Haveg tanks and pipes;

(j) Pleadings filed in this actions.

DE=  
-MO

DOCUMENTS 1 TO 51 PAGE = 1 OF  
 02000 108 DOCUMENT= 1 OF 51  
 CLASS = RP  
 YEAR = 71

GENERAL YEAR=71 DOCNO= 108 DOCCODE=RP REFCODE= DATACOD  
 REFERENCE EPA BACKGROUND INFO FRPSD STANDS (DEC 1971)  
 TERMS \* ASBESTOS / BERYLLIUM / MERCURY / STANDARD NATL EMISSION F  
 02000 1482 DOCUMENT= 2 OF 51

CLASS = RP  
 YEAR = 73

GENERAL YEAR=73 DOCNO= 1482 DOCCODE=RP REFCODE= DATACOD  
 REFERENCE NEW YORKER 16PP (1973) BRODEUR P  
 TERMS \* ASBESTOS / ASBESTOSIS WORKER //  
 02000 3508 DOCUMENT= 3 OF 51

CLASS = RP  
 YEAR = 70

GENERAL YEAR=70 DOCNO= 3508 DOCCODE=RP REFCODE= DATACOD  
 REFERENCE ARCH ENVIR HEALTH 20, 481-2(1970) MT SINAI SCHOOL MED  
 TERMS CMC USE / VINYLPIRIDINE-N-OXIDE POLYMER USE / DRUG ANTIHE  
 \* - CMC / ASBESTOS FIBER HEMOLYTIC / ANTAGONISM //

02000 3523 DOCUMENT= 4 OF 51

\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 2 OF 17

CLASS = RP

YEAR = 68

GENERAL YEAR=68 DOCNO= 3523 DOCCODE=RP REFCODE= DATACODE= FI

REFERENCE ANN OCCUP HYG 11, 1-6(1968) PHS, EDWARDS GH, LYNCH JR

TERMS \* ASBESTOS DETN / AIR ANAL / ANAL PROC PHS //

02000 3895 DOCUMENT= 5 OF 51

CLASS = RP

YEAR = 71

GENERAL YEAR=71 DOCNO= 3895 DOCCODE=RP REFCODE= DATACODE= FI

REFERENCE IND HYG REV 13, 3-5(JAN 1971) NY DIV IND HYG, SHEINBAUM

TERMS \* ASBESTOS SPRAYING / HANDLING //

02000 3896 DOCUMENT= 6 OF 51

CLASS = RP

YEAR = 68

GENERAL YEAR=68 DOCNO= 3896 DOCCODE=RP REFCODE= DATACODE= F.

REFERENCE HMSO, FACTORY INSPECTORATE ASBESTOS REGS 1968, 4PP

TERMS \* ASBESTOS / REGS FACTORY INSPECTORATE / ENG //

02000 3906 DOCUMENT= 7 OF 51

CLASS = RP

YEAR = 68

. \*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 3 OF 17  
GENERAL YEAR=68 DOCNO= 3906 DOCCODE=RP REFCODE= DATACODE= FI  
REFERENCE J OCCUP MED 10, 38-41(JAN 1968) PHS, CRALLEY LJ ET AL  
TERMS \* ASBESTOS / HANDLING / RES REV //  
02000 3907 DOCUMENT= 8 OF 51  
CLASS = RP  
YEAR = 68  
GENERAL YEAR=68 DOCNO= 3907 DOCCODE=RP REFCODE= DATACODE= FI  
REFERENCE J OCCUP MED 10, 25-31(JAN 1968) UNIV CAL, BALZER JL  
TERMS \* ASBESTOS USE / HANDLING / INSULATION //  
02000 3908 DOCUMENT= 9 OF 51  
CLASS = RP  
YEAR = 68  
GENERAL YEAR=68 DOCNO= 3908 DOCCODE=RP REFCODE= DATACODE= FI  
REFERENCE MED TIMES 96, 1223-9(DEC 1968) NY DEPT LABOR, KLEINFELD M  
TERMS \* ASBESTOS / ASBESTOSIS / CA MAN //  
02000 3909 DOCUMENT= 10 OF 51  
CLASS = RP  
YEAR = 68  
GENERAL YEAR=68 DOCNO= 3909 DOCCODE=RP REFCODE= DATACODE= FI  
REFERENCE J OCCUP MED 10, 21-4(JAN 1968) PHS, LYNCH JR, AYER HE  
\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 4 OF 17  
TERMS \* ASBESTOS / TLV / TEST PROC //  
02000 3910 DOCUMENT= 11 OF 51  
CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3910 DOCCODE=RP REFCODE= DATACODE= FIA  
REFERENCE J OCCUP MED 10, 32-7(JAN 1968) UNIV CAL, TABERSHAW IR

TERMS \* ASBESTOS / HANDLING / CA MAN //  
02000 3911 DOCUMENT= 12 OF 51  
CLASS = RP  
YEAR = 66

GENERAL YEAR=66 DOCNO= 3911 DOCCODE=RP REFCODE= DATACODE= FIA  
REFERENCE MED SER BULL NO 11, 16PP (1966)

TERMS \* ASBESTOS / HANDLING / RES IND REV //  
02000 3912 DOCUMENT= 13 OF 51  
CLASS = RP  
YEAR = 05

GENERAL YEAR=05 DOCNO= 3912 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE INTL OCCUP SAFETY HEALTH INF CENTRE CIS BIBLIO NO 6, 39PP

TERMS \* ASBESTOS / HANDLING / ASBESTOSIS / CA MAN / LIT SURVEY //  
02000 3913 DOCUMENT= 14 OF 51  
\*\* STAIRS/VS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 5 OF 17  
CLASS = RP  
YEAR = 69

GENERAL YEAR=69 DOCNO= 3913 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE OCCUP HEALTH NEWS + VIEWS (FA DEPT HEALTH) 7, 2(WINTER 1969)  
TERMS \* ASBESTOS / LABELING //

02000 3914 DOCUMENT= 15 OF 51  
CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3914 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE DIS CHEST 54, 17-19(JULY 1968)INST OCCUP HEALTH (FINLAND)  
TERMS \* ASBESTOSIS ULTRASONIC EXAMN //

02000 3915 DOCUMENT= 16 OF 51  
CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3915 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE NEW YORKER, 27PP(OCT 12, 1968) BRODEUR P  
TERMS \* ASBESTOS / HANDLING / LIT SURVEY //

02000 3916 DOCUMENT= 17 OF 51  
CLASS = RP  
YEAR = 68

\*\* STAIRS/VS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 6 OF 17  
GENERAL YEAR=68 DOCNO= 3916 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FCT 6, 565-6(1968) ROYAL CANCER HOSPITAL LONDON, ROE FJC  
TERMS \* ASBESTOS / ASBESTOSIS / CA MAN //  
02000 3917 DOCUMENT= 18 OF 51

CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3917 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FCT 6, 566-8(1968) ROYAL CANCER HOSPITAL LONDON, ROE ET AL  
TERMS \* ASBESTOS / CA MICE //  
02000 3918 DOCUMENT= 19 OF 51

CLASS = RP  
YEAR = 70

GENERAL YEAR=70 DOCNO= 3918 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FCT 8, 207-10(APR 1970) ANONYMOUS  
TERMS \* ASBESTOS / ASBESTOSIS / CA MAN //  
02000 3919 DOCUMENT= 20 OF 51

CLASS = RP  
YEAR = 69

GENERAL YEAR=69 DOCNO= 3919 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FCT 7, 649(NOV 1969) ANONYMOUS

\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 7 OF 17  
TERMS \* ASBESTOS / HANDLING / REGS STATUTORY INSTRUMENT NO 690 / ENG //  
02000 3920 DOCUMENT= 21 OF 51  
CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3920 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FCT 6, 657-9(DEC 1968) ANONYMOUS  
TERMS \* ASBESTOS / ASBESTOSIS / CA MAN //  
02000 3922 DOCUMENT= 22 OF 51  
CLASS = RP  
YEAR = 67

GENERAL YEAR=67 DOCNO= 3922 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE ARCH ENVIR HEALTH 15, 177-80(1967) NY DIV IND HYG, KLEINFELD+  
TERMS \* ASBESTOS / CA MAN //  
02000 3923 DOCUMENT= 23 OF 51  
CLASS = RP  
YEAR = 65

GENERAL YEAR=65 DOCNO= 3923 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE ARCH ENVIR HEALTH 11, 221-9(AUG 1965) INTL UNION AGAINST CA  
TERMS \* ASBESTOS / CA //  
02000 3924 DOCUMENT= 24 OF 51  
\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 8 OF 17  
CLASS = RP  
YEAR = 66

GENERAL YEAR=66 DOCNO= 3924 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE ARCH ENVIR HEALTH 13, 171-84(AUG 1966) UNIV CINCINNATI KEANE W+  
TERMS \* ASBESTOS USE / GLASS FIBER USE / INSULATION / PIPE / LIT SURVEY //  
02000 3925 DOCUMENT= 25 OF 51  
CLASS = RP  
YEAR = 66

GENERAL YEAR=66 DOCNO= 3925 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE ARCH ENVIR HEALTH 13, 619-21(NOV 1966) PA DEPT HEALTH, LIEBEN  
TERMS \* ASBESTOS / ASBESTOSIS / CA MAN //  
02000 3926 DOCUMENT= 26 OF 51  
CLASS = RP  
YEAR = 68

GENERAL YEAR=68 DOCNO= 3926 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE AM IND HYG ASSN J, 195-201(1968) INST OCCUP HEALT, NORO  
TERMS \* ASBESTOS / ASBESTOSIS / FIN //  
02000 3927 DOCUMENT= 27 OF 51  
CLASS = RP  
YEAR = 70

\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 9 OF 17  
GENERAL YEAR=70 DOCNO= 3927 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE AM IND HYG ASSN J, 598-604(SEPT-OCT 1970) HEW, LYNCH JR, AYER  
TERMS \* ASBESTOS / EXP INDEX //  
02000 3928 DOCUMENT= 28 OF 51  
CLASS = RP  
YEAR = 69  
GENERAL YEAR=69 DOCNO= 3928 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE AM IND HYG ASSN J, 236-44(1969) NIH/NCI, STATON MF+  
TERMS \* ASBESTOS / CA RAT //  
02000 3929 DOCUMENT= 29 OF 51  
CLASS = RP  
YEAR = 66  
GENERAL YEAR=66 DOCNO= 3929 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE CHEM WEEK, P 32(SEPT 10, 1966) ANONYMOUS  
TERMS \* ASBESTOS / POLLUTION AIR / CA MAN //  
02000 3930 DOCUMENT= 30 OF 51  
CLASS = RP  
YEAR = 66  
GENERAL YEAR=66 DOCNO= 3930 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE CHEM WEEK, 1 P(OCT 8, 1966) LETTER TO ED:JOHNS-MANVILLE, HACKNEY  
\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 10 OF 17  
TERMS \* ASBESTOS / POLLUTION AIR / CA MAN / CRITICISM //  
02000 5763 DOCUMENT= 31 OF 51  
CLASS = RP  
YEAR = 62

GENERAL YEAR=62 DOCNO= 5763 DOCCODE=RP REFCODE=SM DATACODE= FLAG  
REFERENCE CLIN PHARM THERAP 3, 774-813(1962) HUEPER WC  
TERMS CHEM / ORG COMPD / METAL / POLYMER / CA / LIT SURVEY //  
FOOD ADD / FOOD COLORANT / CA / LIT SURVEY //  
CA LUNG / ENG / CONN / OHIO / LIT SURVEY //  
CA / WORKER / JOB / LIT SURVEY //

\* ASBESTOS / CHROMATE / CA / LIT SURVEY //  
02000 6590 DOCUMENT= 32 OF 51  
CLASS = RP  
YEAR = 74

GENERAL YEAR=74 DOCNO= 6590 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE BRIT J CANCER 29, 252-69(1974) LLANDOUGH HOSPITAL, WAGNER .03+  
TERMS \* ASBESTOS / ASBESTOSIS / CA / INHAL DUST A,C:RAT //

02000 6591 DOCUMENT= 33 OF 51  
CLASS = RP  
YEAR = 74

\*\* STAIRS/V5 UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 11 OF 17  
GENERAL YEAR=74 DOCNO= 6591 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE BRIT J IND MED 31, 105-12(1974)FIN CA REGISTRY, MEURMAN LO+  
TERMS \* ASBESTOS ANTHOPHYLLITE / MORTALITY WORKER MINE / CA LUNG SMOKING /  
FIN //  
\* ASBESTOS ANTHOPHYLLITE / ILLNESS WORKER MINE / CA LUNG SMOKING /  
FIN //  
\* ASBESTOS ANTHOPHYLLITE / ASBESTOSIS / CA LUNG SMOKING / FIN //  
02000 6592 DOCUMENT= 34 OF 51  
CLASS = RP  
YEAR = 75  
GENERAL YEAR=75 DOCNO= 6592 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE OCCUP SAFETY+HEALTH REPORTER 4, 865(1975)  
TERMS \* ASBESTOS / REGS OSAHRC //  
02000 6593 DOCUMENT= 35 OF 51  
CLASS = RP  
YEAR = 75  
GENERAL YEAR=75 DOCNO= 6593 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE FED REG 40, 47652-65(10-09-75)  
TERMS \* ASBESTOS / REGS OSHA FRPSD //  
02000 7042 DOCUMENT= 36 OF 51  
\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 12 OF 17  
CLASS = RP  
YEAR = 75

GENERAL YEAR=75 DOCNO= 7042 DOCCODE=RP REFCODE= DATACODE= FLAG=  
REFERENCE AIHAJ 36, 83-90 (FEB 1975) AIHA-ACGIH COMM  
TERMS \* ASBESTOS DETN / AIR ANAL / ANAL PROC AIHA-ACGIH //  
02000 9040 DOCUMENT= 37 OF 51

CLASS = RP  
YEAR = 76

GENERAL YEAR=76 DOCNO= 9040 DOCCODE=RP REFCODE= DATACODE= FLAG=  
REFERENCE EXPERIENTIA 32, 602-4(1976)CASE WESTERN RESERVE, EPSTEIN SS+  
TERMS \* ASBESTOS CHRYSOTILE / A OR:MONKEY /  
PANCREAS DNA INCREASE 9-D POST DOSE //

02000 9364 DOCUMENT= 38 OF 51

CLASS = RP  
YEAR = 75

GENERAL YEAR=75 DOCNO= 9364 DOCCODE=RP REFCODE= DATACODE= FLAG=  
REFERENCE J PHARM SCI 64, 1435-49(SEPT 1975)FDA, HALEY TJ  
TERMS \* ASBESTOS- / TOX / CA / LIT SURVEY //

\* ASBESTOSIS / TOX / CA / EPIDEMIOLOGY / LIT SURVEY //

02000 9461 DOCUMENT= 39 OF 51

\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 13 OF 17  
CLASS = RP  
YEAR = 72

GENERAL YEAR=72 DOCNO= 9461 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE BRIT J EXP PATH 53, 190-201(1972) CAMBRIDGE UNIV, DAVIS J  
TERMS MINERAL / PLEURAL INJECTION:MICE(DUST) / FIBROSIS VS FIBER SIZE //  
\* ASBESTOS CHRYSOTILE / PLEURAL INJECTION:MICE(DUST)CONTROL /  
FIBROSIS //

0200010014 DOCUMENT= 40 OF 51  
CLASS = RP  
YEAR = 73

GENERAL YEAR=73 DOCNO=10014 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE LANCET, 807-09(APR 14, 1973) IMP CANCER RES, MAROUDAS NG ET AL  
TERMS \* ASBESTOS / MESOTHELIOMA RAT(FIBER LENGTH) / CA //

0200010253 DOCUMENT= 41 OF 51  
CLASS = RP  
YEAR = 71

GENERAL YEAR=71 DOCNO=10253 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE NATL ACAD SCI, 40PP (1971)  
TERMS \* ASBESTOS / EPIDEMIOLOGY / LIT SURVEY //

0200010289 DOCUMENT= 42 OF 51  
\*\* STAIRS/V5 UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 14 OF 17  
CLASS = RP  
YEAR = 72

GENERAL YEAR=72 DOCNO=10289 DOCCODE=RP REFCODE=SM DATACODE= FLAG  
REFERENCE NIOSH 1972 PH, CRITERIA FOR RECOMMENDED STD  
TERMS \* ASBESTOS MANUF / INHAL WORKER / REGS NIOSH / LIT SURVEY //  
0200010773 DOCUMENT= 43 OF 51  
CLASS = RP  
YEAR = 60

GENERAL YEAR=60 DOCNO=10773 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE CANCER PROG 1960, 81-97(1960) BIDSTRUP FL  
TERMS \* CHROMATE / NICKEL / ASBESTOS / CA WORKER / LIT SURVEY //  
0200011064 DOCUMENT= 44 OF 51  
CLASS = RP  
YEAR = 71

GENERAL YEAR=71 DOCNO=11064 DOCCODE=RP REFCODE= DATACODE= FLAI  
REFERENCE ANN NY ACAD SCI 172, 757-72(1971)MT SINAI SCHOOL MED, SCHNITZER R  
TERMS \* ASBESTOS FIBER / DIVEMA / CMC / ANTAGONISM / HEMOLYSIS IN VITRO //  
0200011641 DOCUMENT= 45 OF 51  
CLASS = RP  
YEAR = 74

\*\* STAIRS/VS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 15 OF 17  
GENERAL YEAR=74 DOCNO=11641 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE BRIT J IND MED 31, 105-12 (1974)  
TERMS \* ASBESTOS ANTHOPHYLLITE / HEALTH / MORTALITY / WORKER MINE / FIN //

0200013679 DOCUMENT= 46 OF 51  
CLASS = RP  
YEAR = 73

GENERAL YEAR=73 DOCNO=13679 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE FED REG 38, 27876-81 (SEPT 28, 1973)  
TERMS \* ASBESTOS / FOOD FILTRATION / DRUG FILTRATION / REGS FDA PRESD //

0200014294 DOCUMENT= 47 OF 51  
CLASS = RP  
YEAR = 78

GENERAL YEAR=78 DOCNO=14294 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE NIH 105P (MAY 1978) PH  
TERMS \* ASBESTOS / MONOGRAPH NIH / LIT SURVEY //

0200015330 DOCUMENT= 48 OF 51  
CLASS = RP  
YEAR = 79

GENERAL YEAR=79 DOCNO=15330 DOCCODE=RP REFCODE= DATACODE= FLA  
REFERENCE NIOSH 75P (APR 79)PH

\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS 1 TO 51 PAGE = 16 OF 17  
TERMS \* ASBESTOS / FIBERGLASS / FIBER DEPOSITION PULMONARY,GI //  
MINERAL(GLASS)WOOL / FIBER DEPOSITION PULMONARY,GI //  
0200015514 DOCUMENT= 49 OF 51  
CLASS = RP  
YEAR = 76

GENERAL YEAR=76 DOCNO=15514 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE NIOSH 96P (DEC 1976) PH REVISE CRITERIA DOC  
TERMS \* ASBESTOS / REGS NIOSH REVISE / LIT SURVEY //  
0200015714 DOCUMENT= 50 OF 51  
CLASS = RP  
YEAR = 79

GENERAL YEAR=79 DOCNO=15714 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE SCIENCE 204, 195-8 (APR 1979) EPA, COOK P + OLSON G  
TERMS \* ASBESTOS / PERSORPTION INTESTINAL //  
0200017379 DOCUMENT= 51 OF 51  
CLASS = RP  
YEAR = 80

GENERAL YEAR=80 DOCNO=17379 DOCCODE=RP REFCODE= DATACODE= FLAG  
REFERENCE NIOSH 106P (FEB 1980) PH  
TERMS \* TALC / ASBESTOS / WORKER EXP / MORTALITY / EPIDEMIOLOGY //  
\*\* STAIRS/VIS UNDER IMS \*\*

DOCUMENTS

1 TO

51

PAGE =

17 OF

17

diag

R0601 \* END OF DOCUMENTS IN LIST - ENTER RETURN OR ANOTHER COMMAND.  
\*\* STAIRS/VS UNDER IMS \*\*

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621.319	Asbestos.
M55	Monkhouse, Allan. Electrical insulating materials. 1926. (Page 188.)

Vert. F.	Asbestos.
Canada	National Research Council of Canada Effects of asbestos in the environment, by Stephen Shugar. 19

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Asbestos	U.S. Environmental Protection Agency. EPA 601/9-78-004.	

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P28	Peters, George A. and Peters, Barbara J. Sourcebook on asbestos diseases: medical, legal, and engineering aspects. N.Y., Garland, 1980. var. pagd. Bibliography. References.
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 Willow Grove, PA, 1974  
 Various pagings \$20.00  
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Textiles	Handbook of asbestos textiles. 3rd. ed. 1967.

EXHIBIT D

SCHEDULE OF INSURANCE COVERAGE  
HAVEG INDUSTRIES

WORKERS' COMPENSATION/EMPLOYERS' LIABILITY

<u>Carrier</u>	<u>Policy Period</u>	<u>Policy Number</u>	<u>Limits</u>	
			<u>W.C.</u>	<u>E.L.</u>
<u>Primary</u>				
Liberty Mutual	1/1/45-1/1/59	Unavailable	Statutory	Unknown
INA	1/1/59-1/1/60	"	"	"
	1/1/60-1/1/61	"	"	"
	1/1/61-1/1/62	WC-306958	"	"
	1/1/62-1/1/63	WC-349396	"	"
Employers Mutuals of Wausau	1/1/63-1/1/64	0514-00-062374	"	"
	1/1/64-1/1/65	0515-00-062374	"	"
	1/1/65-1/1/66	0516-00-062374	"	"
	1/1/66-1/1/67	0517-00-062374	"	"
	1/1/67-1/1/68	0518-00-062374	"	"
	1/1/68-1/1/69	0518-00-062374	Statutory	\$5MM
	1/1/69-1/1/70	0510-02-062374	"	"
	1/1/70-1/1/71	0511-11-062374	"	"
	1/1/71-1/1/72	0512-02-062374	"	\$2MM
	This policy was endorsed to exclude Haveg, Marshallton Location effective 9/1/71.			
Self-Insured	9/1/71-10/8/80 (Haveg's Marshallton Location only)			
<u>CGL, INCLUDING PRODUCTS LIABILITY</u>				
Employers Mutuals	1/1/63-1/1/64	0524-00-062374	B.I. \$100,000/person; \$100,000/occurrence. Aggregate Products \$300,000. (Same from 1/1/63-73)	
	1/1/64-1/1/65	0525-00-062374		
	1/1/65-1/1/66	0526-00-062374		
	1/1/66-1/1/67	0527-00-062374		
	1/1/67-1/1/68	0528-00-062374		
	1/1/68-1/1/69	0529-00-062374		
	1/1/69-1/1/70	0520-00-062374		
	1/1/70-1/1/71	0521-00-062374		
	1/1/71-1/1/72	0522-00-062374		
	1/1/72-1/1/73	2223-00-03841	Hercules named as an Additional Insured. "	
Aetna C&S	1/1/73-1/1/74	04AL-240547SCA(Y)	\$2MM/\$2MM B.I., P.D.	
	1/1/74-4/1/75	04AL-133108SCA(Y)	"	
	4/1/75-4/1/76	04AL-243531SCA	"	
	4/1/76-4/1/77	04AL-243596SCA	"	
	4/1/77-4/1/78	04AL-247719SCA	"	
	4/1/78-6/1/78	04AL-251330SCA	"	
	6/1/78-4/1/79	04AL-251330SCA	\$1MM/\$4MM B.I., P.D.	
	4/1/79-4/1/80	04AL-251382SCA	"	
	4/1/80-10/8/80	04GL-55409SCA	\$2MM/\$4MM B.I., P.D.	

SCHEDULE OF INSURANCE COVERAGE CONTINUED

<u>Carrier</u>	<u>Policy Period</u>	<u>Policy Number</u>	<u>Limits</u>	
			<u>W.C</u>	<u>E.L.</u>
<u>Excess</u> Employers Mutuals of Wausau	1/1/68-1/1/71	0521-06-062374	Excess policy - \$5MM limit of liability; aggregate product limit of \$5MM. Employers' Liability \$100,000 limit.	
	1/1/71-1/1/74 Policy canceled effective 1/1/73	0524-06-062374	Excess Policy - \$2MM limit of liability; aggregate product limit of \$2MM; Employers' Liability B.I., \$100,000/persc \$100,000/occurrence.	