PLAINTIFF'S EXHIBIT

BOND-4

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PATRICIA HARAHAN, ADMX. OF THE ESTATE OF BERNARD HARAHAN DEC'D, PLAINTIFF, v. BONDEX INTERNATIONAL, INC., et al. DEFENDANT.	COURT OF COMMON PLEAS PHILADELPHIA COUNTY MAY TERM, 2000 NO. 0606 ASBESTOS CASE

BONDEX INTERNATIONAL, INC.'S RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION AND INTERROGATORIES DIRECTED TO DEFENDANT, BONDEX INTERNATIONAL, INC.

Bondex International, Inc. ("Bondex") hereby responds to Plaintiffs' First Set of Requests for Admission and Interrogatories Directed to Defendant Bondex International, Inc.

Bondex reserves the right to amend or supplement its Responses if it finds that inadvertent omissions or errors have been made or if additional or more accurate information becomes available that is required to be provided.

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GENERAL OBJECTIONS

Bondex objects to these Requests for Admissions and Interrogatories to the extent they seek it to respond on behalf of any other entity. Bondex was incorporated in the state of Ohio on May 22, 1972 as an independently operated, wholly owned subsidiary of RPM, Inc. On May 31, 1972, Bondex acquired the assets of and assumed the liabilities of The Reardon Company Division of RPM, Inc. ("Reardon"), which manufactured and sold, among other things, certain asbestos-containing products. Bondex continued the manufacture and sale of such products until the cessation of same at various times thereafter. Accordingly, Bondex's Responses to these Interrogatories and Requests for Production are limited (1) to such information as Bondex possesses relating to the activities of Reardon prior to May 31, 1972 and (2) to information relating to its own activities subsequent to May 31, 1972.

Bondex objects to these Requests for Admissions and Interrogatories to the extent they are not limited by time. Bondex ceased the manufacture of all asbestos-containing products in 1981. Bondex' Responses to these Requests for Admissions and Interrogatories are limited to the time period during which Reardon and Bondex engaged in the manufacture and sale of asbestos-containing products which ended no later than 1981.

Bondex objects to these Requests for Admissions and Interrogatories on the grounds that they are vague, ambiguous, overly broad, unduly burdensome, and seek information which is irrelevant and immaterial and which is not reasonably calculated to lead to the discovery of admissible evidence.

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Bondex objects to these Requests for Admissions and Interrogatories to the extent they are not limited in time to a period prior to or contemporaneous with the events underlying this lawsuit.

Bondex objects to these Requests for Admissions and Interrogatories to the extent they seek it to provide information protected by the attorney/client privilege or information otherwise protected from discovery on the grounds of privilege.

Bondex objects to these Requests for Admissions and Interrogatories to the extent they seek it to provide information prepared or obtained in anticipation of litigation or for trial.

These general objections are applicable to Bondex's Response to each and every Request for Admissions and Interrogatory herein, whether or not specifically stated in such Response.

I. REQUESTS FOR ADMISSION

1. You and/or your predecessors, subsidiaries, affiliates or parent corporations have directly or indirectly engaged in the business of mining, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce asbestos products.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex admits only that it has manufactured and sold certain

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asbestos containing products. The remaining allegations of this request are denied.

2. You have never affixed any warnings to any asbestos products manufactured, distributed and/or supplied by you. If denied, state date when warning was first affixed and content of such warning.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Denied. As required by the State of New York in approximately 1972, the following warning label was printed conspicuously on Bondex' packaging for those asbestos-containing products which were placed for sale in the New York State area and which could conceivably be sprayed by an applicator.

CONTAINS ASBESTOS—SPRAY APPLICATION PROHIBITED

IN THE STATE OF NEW YORK

As required by OSHA, the following asbestos warning label was printed conspicuously on packaging for Bondex' paint, patch and repair asbestos-containing products. Bondex is unable to determine the specific date on which this asbestos warning label was first placed on its packaging. However, Bondex believes this occurred during the 1972 to 1974 time frame.

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE

SERIOUS BODILY HARM.

Additionally, the following general warning label was printed conspicuously on Bondex' packaging for those asbestos-containing products which could conceivably be sprayed by an applicator. Bondex is unable to determine the date on which this general warning label was first placed on its packaging.

DO NOT SPRAY WHERE PROHIBITED BY LAW.

To the best of Bondex's knowledge, at least some of its roof coating products included the following warning:

CAUTIONS

Keep away from heat and open flame. Avoid prolonged contact with skin and breathing of vapor or spray mist. Do not take internally. Close container after each use.

Use only with adequate ventilation.

KEEP OUT OF REACH OF CHILDREN

CONTAINS ASBESTOS
Do not spray where prohibited by law.

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Bondex has been unable to determine the date on which this warning first appeared on its packaging.

3. Your corporate logo or insignia was placed on all packages of asbestos products you manufactured, distributed and/or supplied.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Denied.

4. You and/or your predecessors, subsidiaries, affiliates and/or parent corporations have, in their own right, or through a division, affiliate or subsidiary, contracted to install asbestos products in Pennsylvania.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Denied.

5. You and/or your predecessors, subsidiaries, affiliates and/or parent corporations have purchased or received asbestos products for use in your business or for manufacturing your products.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex admits that it has purchased chrysotile asbestos fiber which was used in the manufacturing of certain of its products. The remaining allegations of the request are denied.

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6. You have or had plants, factories or promotional facilities in the Commonwealth of Pennsylvania which are/were engaged in the importation, manufacture, processing, converting, compounding, packaging, distribution and/or sale of asbestos products.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Denied.

7. You and/or your predecessors, subsidiaries, affiliates and/or parent corporations have done business with or utilized distributors or contractors in the Commonwealth of Pennsylvania, counties of Bucks, Montgomery, Delaware, Philadelphia, Berks, Lancaster, Northampton, Lebanon, Chester, Lehigh, Dauphin and/or York for the purposes of selling or installing asbestos products.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex admits that it has done business with distributors in the Commonwealth of Pennsylvania. After reasonable inquiry, Bondex lacks information sufficient to determine whether its has done business with distributors in the specific counties referenced and therefore denies same. The remaining allegations of the request are denied.

8. You and/or your predecessors, subsidiaries, affiliates and/or parent corporations have from 1972 until 2000, contracted, supplied, distributed, marketed or

sold asbestos-containing products to Philadelphia Electric Company (PECO) in Pennsylvania.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Denied.

9. You have manufactured asbestos products which were re-labeled, distributed and/or sold by another entity or corporation under that other entity or corporation's name or trademark.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex admits that certain of its asbestos containing products were sold to a company which sold the product under the company's own name.

10. You have sold and/or marketed and/or supplied under your own name or trademark asbestos products which were manufactured and supplied by another corporation.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Admitted.

II. INTERROGATORIES

I. Please state whether or not you are a corporation. If so, state:

(a) Your correct corporate name;

(b) The state of incorporation;

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(c) The date of your incorporation;

(d) The address of your principal place of business;

(e) Whether or not you have ever held a certificate of authority to do business in Pennsylvania;

(f) Whether or not you have a registered agent for the purpose of accepting service in this state, and if so, the name and present address of that agent;

(g) State your corporate purposes;

(h) State whether or not you have or have had subsidiary or predecessor corporation(s), and if so:

1. The name of the subsidiary and/or predecessor;
2. Its date(s) of incorporation, if a corporation;
3. Its state(s) of incorporation;
4. Its corporate purposes.

(i) Whether your business entity is a product of merger, consolidation, or some other mechanism;

(j) Identify each such merger, consolidation and when it occurred.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states:**

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(a-d) Bondex International, Inc. was incorporated in the state of Ohio on May 31, 1972. Its principal place of business is located at 707 Spirit 40 Park Drive, Suite 130, Chesterfield, Missouri 63005.

(e) To the best of its knowledge, no.

(f) Bondex's registered agent is as follows:

The Prentice-Hall Corporation System, Inc.
2711 Centerville Road, Suite 400
Wilmington, DE 19808
(302) 636-5400.

(g) Bondex objects to this request on the grounds that it seeks information which is irrelevant and immaterial and which is not reasonably calculated to lead to the discovery of admissible evidence.

(h-j) Bondex objects to this Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information which is irrelevant and immaterial and which is not reasonably calculated to lead to the discovery of admissible evidence.

II. State whether you and/or predecessors, subsidiaries, affiliates or parent corporations have at any time directly or indirectly been engaged in the mining, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce asbestos products. If so, be specific in your answer and state as to each such asbestos product:

(a) The trade name, general name and/or other identification of each asbestos product;

(b) The dates during which you mined, manufactured, supplied, distributed, and/or otherwise placed in the stream of commerce each such asbestos product;

(c) The intended use of each such asbestos product;

(d) Furnish a complete description of each such asbestos product including the type of asbestos contained therein and the percentage of asbestos contained in said product;

(e) Describe the physical appearance including color of each such product specifying whether the said product was/is sold in a solid, loose, powdered or other form.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Yes. See Attachment A for a description of each of Bondex' asbestos containing products.

III. Describe in detail the packages in which you would distribute or deliver asbestos products:

(a) The type of box or package used;

(b) The date each type of box or package was used;

(c) A physical description thereof, including the size and color of the box or package;

(d) A description of size and color of any printed material that appeared on or in said box or package;

(e) Identify and produce a photograph or copy of said boxes or packages.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitatlons set forth therein, Bondex states: See response to Interrogatory II. Examples of the packaging for Bondex asbestos containing products that are known to exist are available for inspection and copying upon reasonable notice at the offices of Bowers Orr & Dougall, L.L.P., 8910 Two Notch Road, Suite 400, Columbia, SC 29223.

IV. Did defendant ever affix any warnings to any of the asbestos products it manufactured, distributed and/or supplied? If so, for each such product that contained a warning set forth the following information:

(a) The brand and trade name of each such product that contained a warning;

(b) The date a warning was attached to each such product;

(c) The substance of each warning;

(d) Identify and produce a photograph or copy of each such warning.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: See responses to Request for Admission number 2 and Interrogatory number III.

V. Did defendant ever affix its corporate logo or insignia to the packages of asbestos products that it manufactured, distributed and/or supplied?

If so, for each such corporate logo or insignia set forth the following information;

(a) A description of all logos or insignias used;

(b) The brand and trade name of each such product that contained a logo or insignia;

(c) The inclusive dates that each logo or insignia was utilized;

(d) Identify and produce a photograph or copy of each logo or insignia described in this answer.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Some of the packaging for Bondex's asbestos containing products included a depiction of a cartoon-like man wearing a Bondex hat. It is unknown exactly which products contained the depiction or the exact years that it appeared on the products. Also, see response to Interrogatory III above.

VI. Has defendant and/or its predecessors, subsidiaries, affiliates or parent corporations ever had a division, affiliate or subsidiary which was involved in contracting for or installation of asbestos products in Pennsylvania? If so, for each such entity involved in the contracting or installation of these products, set forth the following information:

(a) Name of each such entity and the nature of its relationship to the defendant;

(b) The inclusive dates that each of the above mentioned entities were in existence; The specific nature of the contracting for or installation of asbestos products in Pennsylvania.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: No.

VII. Has defendant and/or its predecessors, subsidiaries, affiliates or parent corporations ever purchased or received asbestos fiber for use in its business or for manufacturing its products? If so, set forth the following information:

(a) The inclusive dates that your company purchased asbestos fiber;

(b) The name and address of each and every entity that you purchased or received the asbestos fiber from;

(c) The nature and types of products that your company used asbestos fiber for;

(d) The type of asbestos fiber that your company purchased.

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex purchased chrysotile asbestos fiber which was used in the manufacture of Bondex products which contained asbestos. Bondex cannot identify with certainty the dates that said fiber was purchased. From at least 1964, Canadian Johns-Manville, Carey Canada, Inc., Lake Asbestos, and Pacific Asbestos were among the suppliers of asbestos purchased by Bondex.

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VIII. Does defendant have or has it had any plants, factories or production facilities located in the Commonwealth of Pennsylvania which was or is engaged in the importation, manufacture, processing, converting, compounding, packaging, distribution, and/or sale of asbestos products? If so for each such plant, factory or facility which is or has been located in Pennsylvania, set forth the following information:

(a) The name and address of each such plant, factory or production facility;

(b) The inclusive dates that each plant, factory or facility existed;

(c) A complete and detailed description of all products that each plant, factory or production facility was engaged in producing (include in your description the type of product and its generic trade name).

RESPONSE: Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: No.

IX. Did defendant and/or its predecessors, subsidiaries, affiliates or parent corporations ever do business with or utilize any distributors in the Commonwealth of Pennsylvania, counties of Bucks, Montgomery, Delaware, Philadelphia, Berks, Lancaster, Northampton, Lebanon, Chester, Lehigh, Dauphin and York for purposes of selling or installing its asbestos products? If so, identify each such entity, indicate and describe the nature of the business that you did with each such entity, and set forth the dates this business relationship existed.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex has done business with distributors in the Commonwealth of Pennsylvania. After reasonable inquiry, Bondex lacks information sufficient to determine whether its has done business with distributors in the specific counties referenced.**

X. Have you and/or your predecessors, subsidiaries, affiliates and/or affiliates and/or parent corporations from 1972 until 2000, contracted, supplied, distributed, marketed or sold asbestos-containing products to Philadelphia Electric Company (PECO) in Pennsylvania.

1. If yes, state, by brand and product name, the specific asbestos products:
2. State the specific dates, including month and year, for each asbestos product(s);
3. State the specific location or station to which each asbestos-containing product was supplied, distributed, marketed or sold and/or the specific location or station for which services were contracted which involved the use, sale and distribution of asbestos-containing products at PECO.
4. Attach to your interrogatory responses copies of all invoices, bills or lading, bills, receipts and/or any other document describing, reflecting or evidencing the contract, distribution, marketing or sale of the asbestos-containing products to PECO.

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RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: To the best of its knowledge, no.**

XI. Has defendant ever manufactured asbestos products which were distributed by another entity or corporation under that other entity or corporation's name or trademark? If so, identify each such entity which sold or distributed these asbestos products. Indicate which of your company's asbestos product(s) this company marketed and indicate the inclusive dates that this particular commercial arrangement existed.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Yes. Attachment A to these responses identifies other names under which Bondex asbestos-containing products are known to have been sold.**

XII. Has defendant sold and/or marketed and/or supplied under its own name or trademark any asbestos products which were manufactured or supplied by another corporation? If so, identify each and every asbestos product(s) which your company marketed which was manufactured or supplied by another corporation. Indicate the inclusive dates that you marketed each product and describe the name, trade name and generic name of each such product which your company marketed.

RESPONSE: **Bondex incorporates by reference its General Objections. Without waiving its objections, and subject to the limitations set forth therein, Bondex states: Bondex states: Certain of the waterproofing products described**

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in Attachment A, specifically Aluminum Roof Coating (also sold under the names Bondex Heavy Duty Liquid Aluminum Roof Coating); Bondek Roof Cement; Bondek Roof Coating (also sold under the name Bondek Black Mastic); and Mobile Home Aluminum Roof Coating, were manufactured at times for Bondex by Republic Powdered Metals, Inc.

Marshall, Dennehey, Warner, Coleman & Goggin

BY: _____
Daniel J. Ryan, Jr., Esquire

Attorneys for Bondex International, Inc.

Dated: November 30, 2001

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ATTACHMENT A

Reardon/Bondex Products

Bondex International, Inc. ("Bondex") was incorporated in the state of Ohio on May 22, 1972 as an independently operated wholly owned subsidiary of RPM, Inc. On May 31, 1972, Bondex acquired the assets of and assumed the liabilities of The Reardon Company Division of RPM, Inc. ("Reardon"), which manufactured and sold, among other things, certain asbestos-containing products. Bondex continued the manufacture and sale of such products until the cessation of same at various times thereafter.

The following list includes, to the extent that Bondex has been able to determine, information about those products manufactured and sold by Reardon prior to May 31, 1972 which contained chrysotile asbestos fiber as a deliberately added ingredient and information about those products manufactured and sold by Bondex after May 31, 1972 which contained chrysotile asbestos fiber as a deliberately added ingredient.

The list is based upon a diligent and protracted investigation and is believed to be accurate as of the date made. However, Bondex' investigation is a continuing process and Bondex cannot exclude the possibility that it may obtain more complete information. Bondex reserves the right to amend or supplement the list if additional or more accurate information becomes available.

I. Interior Paints and Finishes

A. Dramex Texture Paint

(1) Type of Product

A heavy-bodied durable interior texture finish.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

1.2 percent to 7.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

5, 15 and 25-pound containers.

(7) Method of Application

Applied with wide wall brush.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Dramex Interior Finish; Trax Texture Paint; Wards Texture (Under a private labeling agreement with Montgomery Ward & Co., Inc.); Dramex Spanish Texturing Paint; Metro Texturing (Marketed in New York City only).

B. Dramex Ready Mixed Textured Paint

(1) Type of Product

A heavy-bodied durable interior texture finish.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

5.9 percent to 7.2 percent by weight.

(5) Color and Physical Characteristics

White. A paste. Available in smooth, medium, and rough finishes.

(6) Packaging

1-gallon containers.

(7) Method of Application

Applied with wide wall brush or roller.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Dramex Ready Mixed Interior Finish; F.O. Pierce Dramex (Under an agreement with F.O. Pierce); Metro Interior Finish (Marketed in New York City only); Metro Texturing (Marketed in New York City only); Metro Spanish Texture Paint (Marketed in New York City only).

II. Patching Materials

A. Water Putty (Wood Putty)

(1) Type of Product

An all-purpose interior patching and resurfacing compound.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.4 percent to 6.5 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water to a paste consistency.

(6) Packaging

1, 4, and 25-pound containers.

(7) Method of Application

Applied by putty knife, broadknife, or trowel.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's Water Putty; Penncraft Water Putty (Under a private labeling agreement with J.C. Penney Company, Inc.); Wards Wood Putty (Under a private labeling agreement with Montgomery Ward & Co., Inc.).

B. Multi-Patch

(1) Type of Product

A quick setting interior patching and resurfacing compound.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.5 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

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1, 5, 15 and 25-pound containers.

(7) Method of Application

Applied by trowel or knife.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

None.

C. Handy Patch All Purpose Patcher

(1) Type of Product

A ready-to-use all-purpose interior and exterior patching compound.

(2) Date First Manufactured

1967.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

7.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A paste.

(6) Packaging

Pint, quart and 1 gallon containers.

(7) Method of Application

Applied with knife, trowel, or brush.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

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(9) Other Names

Reardon's Handy Patch All Purpose Patcher, Formula 1031.

III. Drywall Materials

A. SX Joint Cement

(1) Type of Product

A joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1976.

(4) Percentage of Chrysotile Asbestos Fiber

4.8 percent to 13.3 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

5, 15, and 25-pound containers. Also packaged with joint tape in 4 and 18-pound containers.

(7) Method of Application

Applied by trowel or broadknife.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's SX Joint Cement; Trax Joint Cement; Penncraft Joint Cement (Under a private labeling agreement with J. C. Penney Company, Inc.); NPD SX Joint Cement (Under

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a private labeling agreement with National Paint Distributors. Also sold as NPD SX Joint Cement Combination which included joint tape); Hi & Dri Joint Cement.

B. SX Topping Cement

(1) Type of Product

A joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.9 percent to 14.8 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by trowel or broadknife.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's SX Topping Cement; Trax Topping Cement; Hi & Dri Topping Cement.

C. Joint Compound - All Purpose

(1) Type of Product

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A joint compound for use in taping drywall. Also suitable for texturing.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.8 percent to 5.0 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A powder which required mixing with water.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by broadknife.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's All Purpose Joint, Topping and Texture Paint; Reardon's 500-C All Purpose Joint Cement; NPD All Purpose Joint Cement (Under a private labeling agreement with National Paint Distributors); Cook's Lifeline All Purpose Texture Joint and Topping Cement (Under a private labeling agreement with Cook Paint & Varnish Company); "Our Best Grade" Joint Cement (Marketed in the St. Louis, Missouri area only under a private labeling agreement with Hill Behan Stores); GSA Joint Compound (Sold pursuant to contracts with the General Services Administration and manufactured in accordance with federal specification SS-J-570a); Reardon's All Purpose Joint Cement; Bondex "Premium" Joint Compound; Bondex Joint

Compound; Bondex 100-A All Purpose Joint Cement; Bondex 200-B All Purpose Joint Cement; Bondex 500-C All Purpose Joint Cement.

D. Pre-Mixed Joint Cement

(1) Type of Product

A ready-to-use joint compound for use in taping drywall.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

3.4 percent to 3.8 percent by dry weight.

(5) Color and Physical Characteristics

Off-white. A paste.

(6) Packaging

12, 24, 50 and 62-pound containers.

(7) Method of Application

Applied by broadknife.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's Ready-Mixed Joint Cement; Reardon's Pre-Mixed Joint Cement; Wards All Purpose Joint Cement (Ready-Mixed) (Under a private labeling agreement with Montgomery Ward & Co., Inc.); Penncraft Pre-Mixed Joint Cement (Under a private labeling agreement with J.C. Penney Company, Inc.); Brod Dugan Red-I-Mix Joint Cement (Marketed in

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the St. Louis, Missouri area only under a private labeling agreement with Brod Dugan Paint Company).

IV. Primers

A. Block Filler and Primer

(1) Type of Product

A surface primer for porous concrete and masonry.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1977.

(4) Percentage of Chrysotile Asbestos Fiber

4.3 percent to 9.1 percent by dry weight.

(5) Color and Physical Characteristics

White. A powder which required mixing with water to a thick liquid consistency.

(6) Packaging

25-pound containers.

(7) Method of Application

Applied by brush.

(8) Produced After Removal of Chrysotile Asbestos Fiber

Yes.

(9) Other Names

Reardon's Block Filler and Primer;

Penncraft Block Filler (Under a private labeling agreement with J.C. Penney, Inc.)

V. Waterproofing Products

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A. Bontone Fibred Masonry Coating

(1) Type of Product

A heavy-bodied acrylic-based paint designed as an exterior waterproof masonry coating.

(2) Date First Manufactured

Unknown.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1974.

(4) Percentage of Chrysotile Asbestos Fiber

Bondex has been unable to locate a formula for Bontone Fibred Masonry Coating.

(5) Color and Physical Characteristics

White and ten basic colors. A heavy, viscous, ready-to-use liquid.

(6) Packaging

1 and 5-gallon containers.

(7) Method of Application

Applied by brush, roller, or spray.

(8) Produced After Removal of Asbestos

The product was discontinued in 1974.

(9) Other Names Under Which Product Was Sold

None.

B. Aluminum Roof Coating

(1) Type of Product

A ready-to-use asphalt based flexible heavy-bodied coating for previously installed roofing, metal and masonry surfaces.

(2) Date First Manufactured

1967.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

9.4 percent to 11.8 percent by weight.

(5) Color and Physical Characteristics

Silver-gray. A heavy-bodied liquid.

(6) Packaging

1, 5 and 55-gallon containers.

(7) Method of Application

Applied by brush, broom or spray.

(8) Produced After Removal of Chrysotile Asbestos Fiber

The product was discontinued in 1981.

(9) Other Names

Bondex Heavy Duty Liquid Aluminum Roof Coating; Alumanation 301 (Under an agreement with Republic Powdered Metals, Inc.).

C. Bondek Roof Cement (Bondex Roof Cement)

(1) Type of Product

A ready-mixed asphalt based trowel grade roofing cement.

(2) Date First Manufactured

1969.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

10 percent to 16.5 percent by weight.

(5) Color and Physical Characteristics

Black. A thick non-pourable paste.

(6) Packaging

Quart, 1 and 5 gallon containers.

(7) Method of Application

Applied by trowel.

(8) Produced After Removal of Chrysotile Asbestos Fiber

The product was discontinued in 1981.

(9) Other Names

Perma-Plastic (Under an agreement with Republic Powdered Metals, Inc.).

D. Bondek Roof Coating (Bondex Roof Coating)

(1) Type of Product.

A ready-to-use asphalt based flexible heavy-bodied coating for previously installed roofing, metal and masonry surfaces.

(2) Date First Manufactured

1969.

(3) Date Last Manufactured Containing Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

2.1 percent to 8.9 percent by weight.

(5) Color and Physical Characteristics

Black. A gooey semi-liquid.

(6) Packaging

1, 5 and 55-gallon containers.

(7) Method of Application

Applied by brush or heavy-duty spray equipment.

(8) Produced After Removal of Chrysotile Asbestos Fiber

The product was discontinued in 1981.

(9) Other Names

Bondek Black Mastic; Permaroof (Under an agreement with Republic Powdered Metals, Inc.).

E. Mobile Home Aluminum Roof Coating

(1) Type of Product

A ready-to-use asphalt based flexible heavy-bodied coating for previously installed roofing, metal and masonry surfaces.

(2) Date First Manufactured

1969.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

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9.4 percent to 11.8 percent by weight.

(5) Color and Physical Characteristics

Silver-gray. A heavy-bodied liquid.

(6) Packaging

Quart, 1, 2 1/2 and 5 gallon containers.

(7) Method of Application

Applied by brush or broom.

(8) Produced After Removal of Chrysotile Asbestos Fiber

The product was discontinued in 1981.

(9) Other Names

Alumanation 350 (Under an agreement with Republic Powdered Metals, Inc.).

F. "Stays White" Mobile Home Roof Coating

(1) Type of Product

A heavy-bodied vinyl latex coating formulated exclusively for use on mobile homes, recreational vehicles, and travel trailers.

(2) Date First Manufactured

1972.

(3) Date Last Manufactured Containing Chrysotile Asbestos Fiber

1981.

(4) Percentage of Chrysotile Asbestos Fiber

Bondex has been unable to locate a formula for "Stays White" Mobile Home Roof Coating.

(5) Color and Physical Characteristics

White. A heavy-bodied liquid.

(6) Packaging

1, 2-1/2, and 5-gallon containers.

(7) Method of Application

Applied by brush or roller.

(8) Produced After Removal of Chrysotile Asbestos Fiber

The product was discontinued in 1981.

(9) Other Names

None.

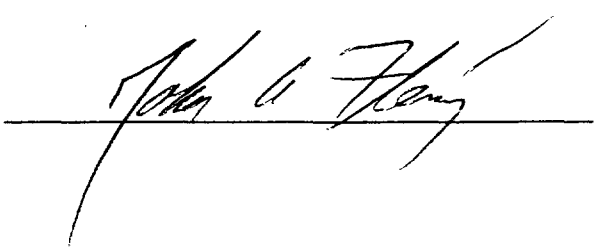
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COUNTY OF ST. LOUIS)

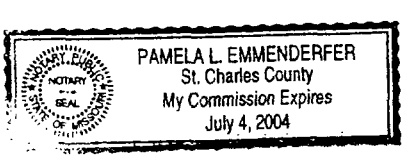
VERIFICATION

Personally appeared before me, the undersigned, who, being duly sworn, states that (s)he is a duly authorized representative of the defendant Bondex International, Inc., that (s)he has read the foregoing Bondex International, Inc.'s Responses to Plaintiff's First Set of Requests for Admission and Interrogatories Directed to Defendant Bondex International, Inc., and that to the best of his/her knowledge, information, and belief the answers contained therein are true and correct.



Sworn to and subscribed before
me this 27th day of November, 2001

Pamela L. Emmenderfer
Notary Public for the State of Missouri
My Commission Expires: 7/4/04



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