PLAINTIFF'S EXHIBIT
CT-54

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

RONALD E. HAVENOR and FAYE W. HAVENOR;and LUIS MOLINA and ANNABELL MOLINA-MUNIZ, as next friend of GENEVIEVE LOLA MUNIZ, minor child,	§	No. CV99-09693
Plaintiffs,	§	
vs.	§	
W.D. INDUSTRIES, INC., et al.	§	
Defendants.	§	

DEFENDANT CERTAINTEED CORPORATION'S RESPONSE TO PLAINTIFFS' INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant CertainTeed Corporation ("CertainTeed"), by and through its undersigned attorneys, hereby responds to *Plaintiffs' Interrogatories and Request for Production of Documents* as follows:

ANSWERS TO INTERROGATORIES

INTERROGATORY NO.1:
State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

ANSWER:

Curtis M. Pontz
Associate General Counsel and Assistant Secretary
CertainTeed Corporation
750 E. Swedesford Road
Valley Forge, PA 19482

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INTERROGATORY NO.2:
State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of New Mexico.

ANSWER:

CertainTeed Corporation. The name was changed from Certain-teed Products Corporation in May 1976. CertainTeed's principal address is 750 E. Swedesford Road, Valley Forge, PA 19482. CertainTeed Corporation was originally incorporated in Maryland in 1917 and most recently incorporated in Delaware on February 23, 1988. It is registered to do business in New Mexico.

INTERROGATORY NO.3:
Please state the following with respect to each expert witness that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including: (a) The name, address, job classification and job qualifications of each such expert witness;

ANSWER:

CertainTeed Corporation has not yet determined the identity of any expert witnesses it may call at trial. CertainTeed Corporation reserves the right to supplement this response if, when, and as it makes such a determination. CertainTeed Corporation reserves the right to call any expert witness listed by any other party to this litigation. CertainTeed Corporation will identify its expert witnesses in accordance with Court-ordered schedules and the New Mexico Rules of Civil Procedure for the identification of expert witnesses and materials.

INTERROGATORY NO.4:
Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

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

ANSWER:

Defendant objects to this interrogatory as vague, premature, overly broad, unduly burdensome and impossible to answer. In the context of asbestos litigation, the phrase "knowledge of facts relevant to this case" is too vague and indefinite to enable defendant to respond. Without waiver of these objections, Defendant responds: At the present time, Defendant incorporates all disclosure

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statements, all discovery conducted by any party including, but not limited to, all discovery responses and all documents produced by all parties in this case. Defendant further states that it has not completed its discovery or review of discovery conducted in this case. Defendant may rely upon the testimony of plaintiffs and upon the testimony of various co-workers. Defendant reserves the right to supplement this response upon completion of its review and of completion of further discovery.

INTERROGATORY NO.5:
As to the disease asbestosis, state:

A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the existence of the disease.

C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.

F. Who is the custodian of such information.

G. The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER:

Defendant objects to this interrogatory as there is no allegation that plaintiffs have this disease. Moreover, no product of this Defendant has been identified in this case.

INTERROGATORY NO.6:
As to the disease lung cancer, state:

A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.

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C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.

F. Who is the custodian of such information.

G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER:

Defendant objects to this interrogatory as there is no allegation that plaintiffs have this disease. Moreover, no product of this Defendant has been identified in this case.

INTERROGATORY NO.7:
As to pleural disease, pleural thickening or pleural plaques, state:

A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

F. Who is the custodian of such information.

ANSWER:

Defendant objects to this interrogatory as there is no allegation that plaintiffs have this disease. Moreover, no product of this Defendant has been identified in this case.

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INTERROGATORY NO.8:
As to the disease mesothelioma, state:

A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.

B. The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.

C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.

G. Who is the custodian of such information.

H. Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER:

Unknown.

INTERROGATORY NO.9:
As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?

C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

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D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

F. Whether any such information is still maintained by defendant or its subsidiary or predecessor in written form.

G. Who is the custodian of such information.

ANSWER:

Defendant objects to this interrogatory as there is no allegation that plaintiffs have this disease. Moreover, no product of this Defendant has been identified in this case.

INTERROGATORY NO.10:
Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any defendants in the Dallas County asbestos litigation.

ANSWER:

No.

INTERROGATORY NO.11:
Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER:

ROOF CEMENTS AND ROOF COATINGS AND FOUNDATION COATING:

I. Asbestos Roof Coating - First placed on the market prior to 1930. Withdrawn from the market in 1982 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for use as a coating for smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

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II. Blind Nailing Cement - First placed on the market prior to 1930. Withdrawn from the market in 1979 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 13% 7M chrysotile asbestos fiber. It was designed for use in sealing the laps of roll roofing applied with no exposed nails and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be applied with a stiff brush or trowel and any atmospheric temperature was recommended.

III. Plastic Cement - First placed on the market prior to 1930. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, pulverized limestone and approximately 18% 7K chrysotile asbestos fiber and 18% 7M chrysotile asbestos fiber. It was designed for flashing, caulking, heavy duty roof repairs and patching roof flashings and was sold in 1 pint, 1 quart, 1/2 gallon and 1 gallon friction top steel cans, 3 and 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

IV. Sealing Cement - First placed on the market prior to 1930. Withdrawn from the market in 1976 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 29% 7M chrysotile asbestos fiber. It was designed for sealing down asphalt shingles and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

V. Cold Process Cement - First placed on the market in approximately 1940. Withdrawn from the market in 1967 (replaced by Cold Process Asphalt). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for use in applying rolls of smooth roofing to obtain a built-up roof and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VI. Cold Process Asphalt - First placed on the market in 1967. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. Cold process asphalt was the name given to "cold process cement" subsequent to 1967. It was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VII. Stabilized Roof Coating - First placed on the market in approximately 1940. Withdrawn from the market in 1967 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for

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coating cold process smooth surface built-up asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

VIII. Wet Seal Plastic Cement - First placed on the market in 1961. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, an amine wetting agent, pulverized limestone and approximately 18% 7K chrysotile asbestos and 18% 7M chrysotile asbestos. It was designed for use in providing adhesion to wet or damp surfaces in making heavy duty repairs to wet roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a black mastic that could be applied with a trowel and any atmospheric temperature was recommended.

IX. Asphalt Fibered Emulsion - First placed on the market sometime during the 1950's. Withdrawn from the market in 1983 due to economic considerations (poor profit margins). It was composed of asphalt, water, clay, electrolyte and an unknown quantity of asbestos fiber. It was designed for coating smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

X. Fibered Aluminum Roof Coating - First placed on the market in 1951. Withdrawn from the market in 1979 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, aluminum powder and an unknown quantity of asbestos fiber. It was designed for coating smooth surface asphalt roofs and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous aluminum colored liquid that could be spread with a brush or roller and any atmospheric temperature was recommended.

XI. Asphalt Foundation Coating - First placed on the market in approximately 1940. Withdrawn from the market in 1981 due to economic considerations (poor profit margins). It was composed of asphalt, mineral spirits, and approximately 6.7% 7M chrysotile asbestos fiber. It was designed for coating the exterior of foundations before backfilling and was sold in 1 gallon friction top steel cans, 5 gallon steel pails and 30 and 55 gallon steel drums. The CertainTeed name appeared on the container. It was a viscous black liquid that could be spread with a brush or sprayed and any atmospheric temperature was recommended.

At some point CertainTeed commenced affixing its logo (C and T with the stem of the T inserted sideways into the C) to the containers in which its roof coatings and roof cements and foundation coating were packaged.

BUILT-UP ROOFING PLY SHEET:

XII. No. 15 Perforated Saturated Asbestos Felt - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber and 58% asbestos fiber (type and grade unknown). It was designed for use as plys for built-up roofs and flashing and packaged with a kraft paper wrapper, was not color coded, and contained no logo or markings except for laying lines of aluminum paint. The CertainTeed name appeared on the wrap. It was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

XIII. Asbestos Base Sheet - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber, glass fiber, pulverized limestone, pulverized talc and 20% asbestos fiber (type and grade unknown). It was designed for use as the first ply in applying a built-up roof and packaged with a kraft paper wrapper, was not color coded, and contained no logo or other marking except for laying lines of orange-red paint. The CertainTeed name appeared on the wrap. It was a black roll good which was nailed or applied with hot asphalt and any atmospheric temperature was recommended.

XIV. Asbestos Base Flashing - First placed on the market in 1968. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber, pulverized limestone, pulverized talc, 19% asbestos fiber (type and grade unknown) and either glass, hemp or jute fiber. It was designed for use as one ply in installing flashing and packaged with a kraft paper wrapper, was not color coded and contained no logo or other markings. The CertainTeed name appeared on the wrap. It was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

XV. Asbestos Cap Sheet (mineral surfaced) - First placed on the market in 1973. Withdrawn from the market in 1976 due to lack of demand for the product. It was composed of asphalt, organic fiber, pulverized limestone, pulverized talc, coarse crushed rock and 13.8% asbestos fiber (type and grade unknown). It was designed for use as the top ply on built-up roofs and packaged with a kraft paper wrapper, was not color coded and contained no logo or other markings except for a laying line of orange-red paint. The CertainTeed name appeared on the wrap. It was a black roll good which was applied with hot asphalt and any atmospheric temperature was recommended.

ASBESTOS-CEMENT SIDING SHINGLES:

XVI. Asbestos-Cement Siding Shingles (manufactured by others)-First placed on the market in approximately 1950. Withdrawn from the market in approximately the early 1970's due to economic considerations (poor profit margins). Asbestos-cement siding shingles were flat slabs which came in various colors (type, grade and quantity of asbestos fiber unknown). They were designed for use on the exterior of homes and they were supplied in packages having a corrugated fiberboard band and sides held in place by two wire ties. The CertainTeed name appeared on the band and any

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atmospheric temperature was recommended

SPECIALTY RAILROAD INSULATION PRODUCTS:

XVII. Glass Fiber Blanket Insulation Faced with Asbestos Paper for Railroad Car Application - First placed on the market by Gustin-Bacon Manufacturing Company in 1945 (CertainTeed, through merger, acquired the Gustin-Bacon Manufacturing Company on July 1, 1966, and at the time of the merger all the ordinary liabilities of Gustin-Bacon were assumed by CertainTeed). Withdrawn from the market in 1947 because of poor moisture vapor transmission and as a result of the determination that there was no need for an incombustible facing. It was composed of nine-micron glass fiber blanket and reinforced asbestos paper facing. It was intended solely for use in insulating ceilings, walls and floors of railroad passenger cars and was packaged in cardboard or wrapped in heavy kraft paper. No writing is believed to have been on the product. The content of any writing on the packaging is unknown and the recommended temperature range is unknown.

XVIII. Flexible Trainline - First placed on the market by Gustin-Bacon Manufacturing Company in 1945. First manufactured and sold by CertainTeed in 1966. Withdrawn from the market in 1970 due to lack of demand for the product. It was composed of nine-micron glass fiber blanket, resin bonded and adhered with adhesive to neoprene coated asbestos cloth. It was intended solely for use in insulating railroad passenger car steam lines. It was packaged in cardboard or wrapped in heavy kraft paper. No writing is believed to have been on the product. The content of any writing on the packaging is unknown and the recommended temperature limit was 300°F.

JOINT TREATING COMPOUND:

XIX. Joint Treating Compound (may have carried the brand name Bestwall) - First placed on the market in 1937. Sales of this product were discontinued on June 30, 1956, when CertainTeed sold its gypsum assets. The composition is unknown other than it is believed to have contained approximately 4 percent asbestos fiber by weight. Joint treating compound was applied to the joints of gypsum wallboard and sold in bags (no additional information is known). It was grayish white and the recommended temperature range is unknown. This product was sold on a regional basis.

ASBESTOS-CEMENT PIPE:

XX. Asbestos-Cement Pipe (may have carried the brand name Fluid-Tite) - First placed on the market on June 1, 1962. CertainTeed ceased the manufacture of asbestos-cement pipe in 1992 due to lack of demand for the product. The asbestos fiber was bound into the asbestos-cement pipe by a combination of cement, silica and water through an autoclave (high pressure steam atmosphere) curing process.

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It contained the following amounts of asbestos by weight:

Pressure Pipe	15 - 20%
Sewer Pipe	10 - 15%
Irrigation Pipe	11 - 20%

Of the total asbestos content of the asbestos-cement pipe, anywhere from 0% to 24% was crocidolite (blue) fiber by weight, with the remaining fiber being chrysotile (white). The ratio of these fibers varied in accordance with various factors, including type of pipe and physical dimensions.

Asbestos-cement pipe was used for the underground transmission of water and sewage. No packaging was used in connection with this product. The sewer pipe contained black lettering, including the name "CertainTeed", the pressure pipe contained either black or orange lettering, including the name "CertainTeed," and the irrigation pipe had black lettering including the name "CertainTeed". It was installed in the form in which it was sold except to the extent that it may have required machining in order to meet a specific length.

Asbestos-cement pipe was cylindrical in shape, cement gray in color with a smooth interior, relatively rough textured exterior, with ends machined to given dimensions. Pipe lengths were connected with an asbestos-cement coupling with two rubber rings contained in machined grooves. The temperature limit was 200°F
ACOUSTICAL PLASTER:

XXI. Acoustical plaster (carried the tradename Kalite) - (for trowel application over standard gypsum plaster) which was sold prior to July 1, 1956. Sales commenced sometime between 1936 and 1940, but the product may not have been sold in asbestos-containing form until approximately 1943. Sales of this product were discontinued on June 30, 1956, when CertainTeed sold its gypsum assets. This plaster was a hard plaster and is believed to have contained approximately 2% asbestos by weight. It was packaged in kraft color 80 pound bags which contained the product name, name of manufacturer, and bag weight. This product was sold only in a limited portion of one south central state (not New Mexico).

INTERROGATORY NO.12:
Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER:

See answer to Interrogatory No. 11.

INTERROGATORY NO.13:
If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

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A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.

B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.

C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.

F. The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

G. The date asbestos was removed from such products, if ever, and the reasons therefor.

H. A description of the physical appearance of each of the named products.

I. A detailed description of the intended uses of the named products.

J. Identify the last year that you sold each asbestos-containing product.

ANSWER:

See answer to Interrogatory No. 11.

INTERROGATORY NO.14:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No.13 still exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.

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ANSWER:

No.

INTERROGATORY NO.15:
Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 10-13 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

A. The names of the products tested and the date of each test.

B. The name, and job title of each person conducting or involved with conducting the tests.

C. The results of the tests.

ANSWER:

No.

INTERROGATORY NO.16:
Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No.13 now exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER:

Not applicable.

INTERROGATORY NO.17:
Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No.15? If the answer is affirmative, state:

A. The trade names of the products changed.

B. The nature of the changes made and the date of such changes or modifications.

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C. The name, address, and job title of each person responsible for having caused a change to be make, or having made a change or modification.

ANSWER:

Not applicable.

INTERROGATORY NO.18:
After releasing the products listed in Interrogatory No. 13 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products?

If the answer is affirmative, state:

A. The names of the products tested and the dates of such tests.

B. The name, address, and job title of each person who conducted those tests.

C. The results of those tests.

D. Whether, as a result of the tests, any products were removed from the market.

E. The names of all products removed from the market as a result of these tests.

ANSWER:

No.

INTERROGATORY NO.19:
Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No.13 now exist? If so, state:

A. The name of each product.

B. A description of each document and how it relates to each product.

C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

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ANSWER:

No.

INTERROGATORY NO.20:
Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No.15, 17 or 18? If the answer is affirmative, state:

A. The names of the products changed or modified.

B. The name, address, and job title of each person responsible for having made a change or modification.

C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER:

Not applicable.

INTERROGATORY NO.21:
Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material of any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No.13? If so, state:

A. The names of each relevant product.

B. The exact working of each warning statement on each printed material.

C. A description of the printed material other than the warning statement.

D. The method used to distribute the warning to persons likely to use the product.

E. The date each warning was first issued, distributed, or placed on packaging.

F. The name, address, and job title of each person responsible for having drafted or issued the warning.

G. The current location of any such printed material and the custodian thereof.

H. The form in which such literature or printed material can be accessed, the manner in which such literature is indexed or stored.

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ANSWER:

Beginning in 1977 CertainTeed included in the comprehensive asbestos-cement pipe binder collation furnished to purchasers of its asbestos-cement pipe a booklet entitled "Recommended Work Practices for A/C Pipe" published by the A/C Pipe Producers Association. The entire booklet was intended to warn about improper pipe machining techniques. The booklet was incorporated into the CertainTeed Installation Guide for Fluid-Tite Asbestos-Cement Pressure Pipe as well as into the CertainTeed Asbestos-Cement Pressure Installation Guide.

In addition, CertainTeed printed a warning in certain of its brochures as follows:

(1) CertainTeed Installation Guide Asbestos-Cement Fluid-Tite Non-Pressure Sewer Pipe (Code No. 40-31-06). On page 21, it was stated, "CAUTION - Asbestos-cement pipe contains asbestos fibers. Do not cut or machine without protection. Breathing asbestos dust may cause serious bodily harm." Published early 1980 - use discontinued after document inventory depleted. This document was typically used only in comprehensive asbestos-cement pipe binder collations, which always included a copy of the booklet entitled "Recommended Work Practices for A/C Pipe" published by the A/C Pipe Producers Association.

(2) Installation Guide Fluid-Tite Pressure Pipe (Code No. 40-21-07). On inside front cover and on page 31, it was stated as cited in (1) above. Published early 1977 - replaced in 1982 by the A/C Pressure Installation Guide cited in subpart (3) below. Also incorporated a reproduction of the booklet entitled "Recommended Work Practices for A/C Pipe" published by A/C Pipe Producers Association.

(3) A/C Pressure Installation Guide - Distribution and Fluid Transmission Piping Systems (Code 40-23-07). On page 9 it was stated, "CAUTION - Asbestos-cement pipe contains asbestos fibers. Do not cut or machine without protection. Breathing asbestos dust may cause serious bodily harm. Refer to 'Recommended Work Practices for A/C Pipe.'" Pages 39-47 were a reproduction of the booklet entitled "Recommended Work Practices for A/C Pipe" published by the A/C Pipe Producers Association. Published March 1982.

With regard to warnings on products, the label placed on CertainTeed asbestos-cement pipe beginning in 1979 read as follows:

> "CAUTION: Always use recommended work practices. Do not use abrasive saws. When cutting, machining and tapping, refer to Recommended Work Practices Guide furnished by manufacturer to your employer."

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In approximately July 1985 the caution label was changed to read as follows:

CAUTION:
+ Contains asbestos fiber.
+ Avoid creating dust. Breathing asbestos dust can cause serious bodily harm, including cancer and asbestosis.
+ When cutting, machining and tapping always use recommended work practices (Refer to Recommended Work Practices Guide furnished by manufacturer to your employer).
Do not use Abrasive Disc Saws.

The warning was placed on the unmachined portion of pipe (quarter lengths and larger) at or near the end of the pipe.

No warnings were placed on any of the other products cited in the answer to Interrogatory No. 11.

INTERROGATORY NO.22:
Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in New Mexico, is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state.

A. The name and address of each claimant.

B. The date of notice of each claim.

C. A description of the claim.

D. The type of injuries allegedly sustained.

E. The name and address of each attorney who represents each individual making a claim.

F. The style and court number of each claim.

G. The disposition of each claim that has been settled or taken to judgment.

ANSWER:

No.

INTERROGATORY NO.23:
Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER:

No.

INTERROGATORY NO.24:
Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas, New Mexico, Arizona and Virginia? If so, state:

A. The name and address of each such distributor or sales representatives.

B. The years in which such company or person distributed, marketed, or sold your products.

C. What products were distributed, marketed, or sold and in what years.

ANSWER:

Certain Teed cannot respond to this Interrogatory since it has no log or registry or other source which would contain such information.

INTERROGATORY NO.25:
List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER:

CertainTeed has employed a Medical Director since 1973. Dr. J.L. Goodman served from March 1973 until December 1978 (he is deceased). Dr. L.J. Mellon has served in that capacity from December 1978 to the present.

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The Medical Director is responsible for CertainTeed's medical program, a program of preventive medical care to deal constructively with the health of employees in relation to their work. The basic objectives of the medical program are as follows:

(1) To protect employees against health and safety hazards in their work situation; (2) Insofar as practical and feasible, to protect the general environment of the community; (3) To facilitate the placement of workers according to their physical, mental and emotional capacities in work which they can perform with an acceptable degree of efficiency and without endangering their own health and safety or that of others; (4) To assure adequate medical care and rehabilitation of the occupationally ill and injured; and (5) To encourage and assist in measures for personal health maintenance, including the retention of a personal physician whenever possible.

The following individuals have been employed as industrial hygienists for CertainTeed Corporation:

Leon Horowitz was employed by CertainTeed Corporation at its offices in Valley Forge, PA from 1962 - 1967. Mr. Horowitz is no longer employed by CertainTeed.

Walter Gubar was employed by CertainTeed at its offices in Kansas City, Kansas from 1966 - 1984. Mr. Gubar is retired from CertainTeed.

Owen H. Kittilstad was employed by CertainTeed at its facilities in Valley Forge, PA from 1977 to 1988. Mr. Kittilstad, who was Corporate Director, Health & Safety, is retired from CertainTeed.

Thomas C. Shaffer was employed by CertainTeed at its facilities in Valley Forge, PA from 1978 - 1981. Mr. Shaffer is no longer employed by CertainTeed.

Janis L. Woodson has been employed by CertainTeed at its facilities in Valley Forge, PA since 1978.

Peter J. Norris was employed by CertainTeed at its facilities in Valley Forge, PA from 1981 - 1986. Mr. Norris is no longer employed by CertainTeed.

INTERROGATORY NO.26:

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

A. The name of each such publication.

B. The date of publication and the names of the author and publisher (if any)

C. The date received by Defendant, if known.

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D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER:

Certain Teed cannot respond to this Interrogatory since it has no log or registry or other source which would contain such information.

INTERROGATORY NO.27:
Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

A. The name and address of each such association or organization.

B. The dates during which Defendant or any of its subsidiaries or predecessors were members.

C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.

D. Whether any of those publications are still in your possession, and if so:

1. A description of the publications, including the date.

2. The current location of such publications.

3. The custodian of such publications.

4. The method or manner in which such publications are maintained.

ANSWER:

CertainTeed objects to this Interrogatory on the basis that it is overly broad and unduly burdensome. Without waiving said objection and subject thereto, CertainTeed has belonged to N.I.M.A. from 1967 through 1973, T.I.M.A. from 1973 through the present, A.I.A./N.A. since its founding in 1971, and the Association of Asbestos-Cement Pipe Producers since its formation in 1973. CertainTeed joined the Industrial Health Foundation in 1968 (we have no record of when CertainTeed ended its affiliation), and belonged to the Gypsum Association for an unknown period of time prior to 1956. Certain Teed has no log or registry or other source of information pertaining to publications, minutes or reports published or disseminated by any trade organizations.

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INTERROGATORY NO.28:
Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 10-13 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER:

Following is a list of all pertinent manufacturing locations (the dates in parenthesis represent date facility began operation and date it ceased operation):

Asbestos-cement pipe:
Ambler, PA (1938-1982)
South Main Street
Ambler, PA 19002

St. Louis, MO (1938-1979)
600 St. Cyr Road
St. Louis, MO 63137

Hillsboro, TX (1961-1987)
PO Box 403
U.S. Highway 77N
Hillsboro, TX 76645

Santa Clara, CA (1953-1982)
LaFayette & Kifer Roads
Santa Clara, CA 95050

Riverside, CA (1965-1992)
P.O. Box 706
2100 Avalon
Riverside, CA 92501

Specialty Insulation Products for Railroad Industry:
Kansas City, KS (1943-present)
103 Funston Road
Kansas City, KS 66115

Roofing Products:
Avery, OH (1972-present)
11519 U.S. Rt. 250 North
Milan, OH

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Chicago Heights, IL (1931-1984)
10th & States Streets
Chicago Heights, IL 60411

Dallas, TX (1946-1984)
79110 S. Central Expressway
Dallas, TX 75216

East St. Louis, IL (1901-1969)
Address Unknown

Kansas City, MO (1901-1981)
1248 Crystal Street
Kansas City, MO 64126

Marseilles, IL (unknown-1955)
Address Unknown

Minneapolis, MN (1934-1973)
Address Unknown

Niagara Falls, NY (unknown-1957)
Address Unknown

Oxford, NC (1979-present)
200 CertainTeed Road
Oxford, NC 27565

Richmond, CA (1915-1984)
1014 Chesley Avenue
Richmond, CA 94804

Savannah, GA (1930-1987)
Foundation Drive
Savannah, GA 31402

Shakopee, MN (1974-present)
3303 Fourth Avenue
Shakopee, MN 55379

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Tacoma, WA (1955-1984)
1718 Thorne Road
Tacoma, WA 98402

York, PA (1916-1981)
702 S. Richland Avenue
York, PA 17405

Joint treating compounds:

Acme, TX (unknown - 1956)
Address Unknown

Fort Dodge, IA (unknown - 1956)
Address unknown

Acoustical Plaster:

Acme, TX (unknown - 1956)
Address Unknown

INTERROGATORY NO.29:
Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

A. The name, address, and job title of each person or entity who prepared such materials.

B. The name, address, and job title of each person who currently has possession of such materials and their present location.

C. The date the materials were prepared.

D. The media used to disseminate the sales materials.

ANSWER:

It is not believed that any advertisements were prepared for the two specialty railroad insulation products, siding shingles, built-up roofing products or roof coatings and cements. CertainTeed has no knowledge as to whether advertising was prepared in connection with joint treating compounds or acoustical plaster.

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With respect to asbestos-cement pipe, it was advertised, but CertainTeed is unable to further respond because it maintains no log or registry on the subject.

The promotional literature of which CertainTeed has possession pertaining to asbestos-cement pipe is listed on Exhibit A attached hereto.

CertainTeed has the following such documents pertaining to roof coatings and cements: "CertainTeed Protective Products -- cements and coatings" (dated January 1972); and "CertainTeed Protective Products --cements and coatings" (dated August 1975), attached hereto as Exhibit B.

The only such literature in CertainTeed's possession regarding Flexible Trainline is a copy of a two page brochure which was published between 1966 and 1970, attached hereto as Exhibit C.

CertainTeed has no such documents pertaining to joint treating compound, asbestos-cement siding shingles, glass fiber blanket insulation faced with asbestos paper sold to the railroad industry, acoustical plaster, or roll roofing products.

The remainder of this interrogatory is objected to on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY NO.30:
Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.

B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.

C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.

D. The year each such written material or instruction was prepared and disclosed to potential consumers.

ANSWER:

See answer to Interrogatory No. 21.

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INTERROGATORY NO.31:

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

ANSWER:

Certain Teed is a member of the Center for Claims Resolution and therefore objects to this interrogatory on the basis that it is unduly burdensome and the information sought is not reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY NO.32:
Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER:

CertainTeed objects to this interrogatory on the basis that it is overly broad, vague, and not calculated to lead to relevant information.

INTERROGATORY NO.33:
Describe in detail the types of packages or packaging which defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER:

See answer to Interrogatory No. 11.

INTERROGATORY NO.34:
Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

A. The name of the company manufacturing the asbestos products.

B. The trade name affixed to those products.

C. The periods of time covered by each such agreement.

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D. The volume, in dollar amount, of each transaction.

E. The initial purchaser of the products.

ANSWER:

No.

INTERROGATORY NO.35:
List the name and address of each company from which defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER:

Between 1977 and 1983 CertainTeed bought roof cements and coatings from various companies which it in turn sold in the form purchased. In addition, CertainTeed may have purchased extremely small quantities of asbestos-cement pipe from Johns-Manville and Flintkote on isolated occasions, but CertainTeed has no records in that regard.

INTERROGATORY NO.36:
Does Defendant or any of its subsidiaries or predecessor currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No.34? If the answer is affirmative, state:

A. The name, address, and job title of each person having custody of each of those documents and their current location.

B. A brief description of each such document, including the dates and the parties signatory.

ANSWER:

Not applicable.

INTERROGATORY NO.37:
Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

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A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim, the disease alleged in each such claim.

B. A brief summary of the disposition of each such claim.

C. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER:

No.

INTERROGATORY NO.38:
Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such setoff minutes, state:

A. The dates of each such meeting.

B. The general subject matter discussed at each meeting.

C. Who was in attendance at each meeting.

D. Where and by whom the written minutes are presently maintained.

E. By whom the minutes were taken and put into final format.

F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER:

With respect to minutes of meetings other than those of the Board of Directors, Certain Teed cannot respond to this interrogatory since it has no log or registry or other source which would contain such information. The only pertinent minutes of the Board of Directors meetings are attached hereto as Exhibit D.

INTERROGATORY NO.39:
Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

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A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.

B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.

C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.

F. A description of the physical appearance of each product and its packaging.

G. A detailed description of the intended uses of each of the named products.

H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER:

No.

INTERROGATORY NO. 40:
State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

A. The location of such documents.

B. The name and address of the custodian of the documents.

C. The format in which the documents are kept, i.e., hardcopy, microfilm, microfiche, etc.

D. In what form the documents can be accessed, i.e, by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

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ANSWER:

Historically, CertainTeed has sold its construction materials through dealers or distributors, and accordingly, to the extent CertainTeed has any sales records in its possession, it has no such records which would typically indicate sales to particular sites.

CertainTeed's asbestos-cement pipe was sold to distributors and directly to end users. Certain Teed has no sales records for asbestos-cement pipe for the period 1962 (when CertainTeed commenced the manufacture of said product) to 1966. For the period 1967 to 1992, CertainTeed has invoices for sales for June 1967, October through December 1968, and 1969 through 1992, inclusive.

The approximate numbers of such invoices are as follows:

6/67, 10-12/68	2,500
1969	14,950
1970	13,900
1971	16,250
1972	15,050
1973	16,364
1974	23,000
1975	25,000
1976	25,000
1977	28,000
1978	30,800
1979	33,300
1980-1992	Unknown

These invoices have been maintained on microfilm and are filed only by invoice number, plant and year. If required, Certain Teed will make available said invoices, which are maintained at the headquarters of Certain Teed's Pipe Group in Valley Forge, Pennsylvania, for review and copying by proper counsel at a mutually convenient time, with all costs attendant to this inspection and copying to be assumed by the party conducting such inspection.

CertainTeed has no sales records for joint treating compound, asbestos-cement siding shingles, Flexible Trainline and glass fiber blanket faced with asbestos paper for railroad car application (the two latter products were sold exclusively to railroad companies), or asbestos bearing roofing products (the roofing products were sold through building material distributors and/or lumber yards).

INTERROGATORY NO.41:

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

A. The name, address, and job title of each company representative who may be called.

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B. A summary of the testimony expected to be given by each such witness.

C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER:

Unknown as of present date.

INTERROGATORY NO.42:
Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

A. Full and correct name;

B. Principal place of business;

C. State of incorporation;

D. Date of acquisition by Defendant;

E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER:

On July 1, 1966, CertainTeed, through merger, acquired the Gustin-Bacon Manufacturing Company (pursuant to an Agreement and Articles of Merger between Certain-teed Products Corporation and Gustin-Bacon Manufacturing Company dated April 19, 1966). At the time Gustin-Bacon Manufacturing Company merged into CertainTeed, all the ordinary liabilities of the former entity were assumed by CertainTeed. The only asbestos-bearing products with which Gustin-Bacon ever had any nexus were two specialty insulation products sold exclusively to railroad companies. One of these products, Flexible Trainline, which was made of fiber glass which had an asbestos cloth facing, was used to insulate steam lines on railway passenger cars, and the other, which had no trade name, was a glass fiber blanket faced with asbestos paper (previously cited as "glass fiber blanket insulation faced with asbestos paper") which was used to insulate the walls, floors and ceilings of railway passenger cars. Other than the two aforesaid specialty insulation products, CertainTeed has never made or sold any asbestos-bearing insulation products whatsoever.

On June 1, 1962, CertainTeed purchased from Keasbey & Mattison Company (pursuant to an Agreement between Keasbey & Mattison Company and Certain-teed Products Corporation dated

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April 1, 1962) its four asbestos-cement pipe plants and all of its machinery, fixtures, tools and supplies which related to and had been used by Keasbey & Mattison exclusively in the making of asbestos-cement pipe.

CertainTeed's purchase of Keasbey & Mattison's assets was limited to the four aforementioned asbestos-cement pipe plants and related machinery, etc. CertainTeed did not purchase any Keasbey & Mattison assets which had been used to manufacture insulation, textile or roofing materials. At the time of the purchase of the Keasbey & Mattison asbestos-cement pipe assets, there was no general assumption of liability by CertainTeed nor did CertainTeed specifically assume liability for claims growing out of the sale of any Keasbey & Mattison products manufactured prior to the date of purchase by CertainTeed of Keasbey & Mattison's asbestos-cement pipe assets.

The asbestos-cement pipe made by CertainTeed was used solely for the underground transmission of water and sewage, was not used in conjunction with insulation material, was typically installed by pipeline contractors, and was never installed inside buildings.

The remainder of this Interrogatory is objected to on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY NO.43:
Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If so, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER:

Yes.

INTERROGATORY NO.44:
For each asbestos-containing product identified in response to Interrogatory No.13, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER:

See answer to Interrogatory No. 11.

INTERROGATORY NO.45:
Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

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

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

ANSWER:

Yes.

INTERROGATORY NO.46:
Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER:

No except that it was foreseeable that the Flexible Trainline product might have to be removed.

INTERROGATORY NO.47:
Before 1970, did you or your subsidiaries or predecessor(s)ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER:

Certain Teed cannot respond to this Interrogatory since it has no log or registry or other source which would contain such information.

INTERROGATORY NO.48:
If Defendant performed or performed any dust level counts, what action, based on results, did your company take?

ANSWER:

See answer to Interrogatory No. 47.

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INTERROGATORY NO.49:

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

A. Name of the person or firm conducting such studies;

B. The date the studies began and the date they were completed;

C. Any publication or other written dissemination of the results of the studies;

D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

ANSWER:

No.

INTERROGATORY NO.50:

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

1. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?

2. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?

3. State in detail the purposes, duties, and responsibilities or such Research Department.

ANSWER:

Not with respect to the health aspects of asbestos.

INTERROGATORY NO.51:

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

A. The year such Medical Department was established;

B. Whether or not such Medical Department has operated continuously since being established;

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C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;

D. State the duties and responsibilities of such Medical Department.

ANSWER:

See answer to Interrogatory No. 25.

INTERROGATORY NO.52:
Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing product or on their packaging. If so, identify the product(s)and year said warning was first applied.

ANSWER:

See answer to Interrogatory No. 21.

INTERROGATORY NO.53:
Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER:

53 See answer to Interrogatory No. 11.

INTERROGATORY NO.54:
Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER:

No.

INTERROGATORY NO.55:
Did your company or its predecessor (s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

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A. All details of such recall;

B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place;

C. The dates of recall;

D. The purpose for the recall.

ANSWER:

No.

INTERROGATORY NO.56:
Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER:

No.

INTERROGATORY NO.57:
Have any products you identified in your response to Interrogatory Nos. 54 and 56 not performed as intended? Please list all such products that have not performed as intended.

ANSWER:

Not applicable.

INTERROGATORY NO.58:
Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER:

This Interrogatory is objected to on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence in as much as the plaintiffs were not employed by CertainTeed. Without waiving said objection and subject thereto, dust samples were taken periodically at CertainTeed's asbestos-cement pipe plants subsequent to June 1, 1962 (when CertainTeed began manufacturing asbestos-cement pipe), by state or federal agencies or by the loss control departments of CertainTeed's workers' compensation insurance carriers, and

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subsequent to 1973 by defendant's employees. Any such sampling results are in the custody of defendant and are on file in CertainTeed Corporation's Health and Safety Department in Valley Forge, Pennsylvania.

INTERROGATORY NO.59:
As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;

B. The name of the employee or official of the company receiving such advice;

C. How Defendant received notice of such limits or concentrations.

ANSWER:

Unknown.

INTERROGATORY NO.60:
Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No.59 for total dust, and not asbestos dust alone?

ANSWER:

Unknown.

INTERROGATORY NO.61:
State in detail what tests, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

ANSWER:

None.

INTERROGATORY NO.62:
Please identify documents which will be used at time of trial, (Exhibit List, Deposition List) , which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

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ANSWER:

Defendant has not yet determined the documents or depositions which will be used at time of trial. At the present time, Defendant incorporates all documents identified in any parties' disclosure statements, all discovery conducted by any party including, but not limited to all discovery responses, all documents produced by all parties in this case and all deposition transcripts and exhibits identified by any party in this case. Defendant reserves the right to supplement this information if, when, and as it makes such a determination. Defendant reserves the right to use any exhibit listed by any other party to this litigation. Defendant will identify its exhibits in accordance with Court-ordered schedules and the New Mexico Rules of Civil Procedure for the identification of exhibits and documents.

INTERROGATORY NO.63:
Please state when you first received a copy of the Fleischer/Drinker Report published in 1945/1946.

ANSWER:

CertainTeed cannot respond to this Interrogatory since it has no log or registry or other source which would contain such information.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO.1:
Please produce a true and correct copy of each photograph of each asbestos-containing product identified in Answer to Interrogatory No.11.

RESPONSE:

CertainTeed objects to this interrogatory on the basis that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant information. Without waiving said objection and subject thereto, CertainTeed does not have photographs with regard to the products mentioned in Interrogatory No. 11 except for pictures contained in the promotional literature cited in the response to Interrogatory No. 29.

REQUEST FOR PRODUCTION NO.2:
Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 2 of these Interrogatories and Request for Production.

RESPONSE:

None.

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REQUEST FOR PRODUCTION NO.3:
Please provide a copy of all documents and other materials and reports identified in Answer to Interrogatory No. 3(d), other than Depositions and Medical History provided by Plaintiff.

RESPONSE:

Not applicable. See response to Interrogatory No. 3.

REQUEST FOR PRODUCTION NO.4:
Please provide a copy of all documents and reports other than Deposition and Medical History provided by Plaintiff identified in Answer to Interrogatory No. 3(e).

RESPONSE:

Not applicable. See response to Interrogatory No. 3.

REQUEST FOR PRODUCTION NO.5:
Please provide a copy of all documents, reports and other materials identified in Answer to Interrogatory No.62.

RESPONSE:

Not applicable. See response to Interrogatory No. 62.

REQUEST FOR PRODUCTION NO.6: Please produce any and all x-rays, MRI's, CT-scans, videotapes or other electronically or technologically created representations, depictions, picturizations, imaging or imagery collected by Defendant in the course of discovery.

RESPONSE:

Defendant objects to this request as vague, indefinite and overly broad as stated, and to the extent that it requests materials protected from discovery as attorney work product.

REQUEST FOR PRODUCTION NO.7:
All documents which support, contradict, or are otherwise relevant to Plaintiffs' claims of exposure to Defendants' products any worksite identified in Plaintiffs' response to discovery.

RESPONSE:

Defendant objects to this request as vague, indefinite, overly broad, unduly burdensome, premature and impossible to answer. This request fails to adequately specify the categories of documents to be produced, especially in the context of asbestos litigation. In addition, Defendant does not have sufficient information about Plaintiffs' claims to respond to this request at this time. Without

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waiving these objections, Defendant incorporates all disclosure statements, all discovery conducted by any party including, but not limited to, all discovery responses, all documents produced by all parties in this case and the testimony of plaintiffs, various co-workers and any other witnesses relating to or identified in this case. Defendant further states that it has not completed its discovery or review of discovery conducted in this case. Defendant reserves the right to supplement this response upon completion of its review and of completion of further discovery.

AS TO OBJECTIONS AND DEFENSES:

BAKER & HOSTETLER LLP

Colo. No. 31040

By Heidi L. Kuhlen for

Mary Price Birk, Colo. No. 10415
Ronald L. Hellbusch, Colo. No. 26094
303 E. 17th Avenue, Suite 1100
Denver, Colorado 80203
(303) 861-0600

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.
Tim L. Fields, Esq.
Wade Woodard, Esq.
500 Fourth Street NW
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

ATTORNEYS FOR DEFENDANT CERTAINTEED CORPORATION.

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VERIFICATION

CURTIS M. PONTZ, being duly sworn according to law, deposes and says that he is Associate General Counsel and Assistant Secretary of CertainTeed Corporation and is duly authorized to make this Verification on its behalf and that the facts set forth in the foregoing responses to the Plaintiffs' Interrogatories to Defendant are true and correct to the best of his knowledge, information and belief.

CERTAINTEED CORPORATION

BY: Curtis M Pontz
CURTIS M. PONTZ
Associate General Counsel and Assistant Secretary

DATED: May 25, 2000

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VERIFICATION

CURTIS M. PONTZ, being duly sworn according to law, deposes and says that he is Associate General Counsel and Assistant Secretary of CertainTeed Corporation and is duly authorized to make this Verification on its behalf and that the facts set forth in the foregoing responses to the Plaintiffs' Request for Production to Defendant are true and correct to the best of his knowledge, information and belief.

CERTAINTEED CORPORATION

BY: Curtis M Pontz
CURTIS M. PONTZ
Associate General Counsel and Assistant Secretary

DATED: May 25, 2000

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1. "Certain-teed Fluid-Tite Asbestos-Cement Pressure Pipe-CERTA-SPACER Band" Published 1964.

2. "Fluid-Tite Asbestos-Cement Pressure Pipe" Published 1966.

3. "Fluid-Tite Asbestos-Cement Pressure Pipe" Published 1970.

4. "Certain-teed Asbestos-Cement Non-Pressure Sewer Pipe" Published 1969.

5. "Certain-teed - We Have Specially Designed Our Coupling To Do A Sewer Job" Published 1967.

6. "The Modern Trend Underground/Certain-teed Fluid-Tite" Pulbished 1967.

7. "Fluid-Tite Asbestos-Cement Small Diameter Sewer Pipe and Accessories Made By Certain-teed" Published 1970.

8. "Certain-teed High Head Asbestos-Cement Irrigation Pipe" Published 1967.

9. "Certain-teed Type 25,75 and 125 Asbestos-Cement Irrigation Pipe" Published 1969.

10. "Certain-teed High Head Asbestos-Cement Irrigation Pipe" Published 1970.

11. Threaded Brass Insert Couplings, Published 7/75.

12. FLUID-TITE Asbestos Cement Non-Pressure Sewer Pipe (Specification Sheet), Published 10/75.

13. Installation Guide Asbestos Cement FLUID-TITE Non-Pressure Sewer Pipe, Published 3/73

14. Asbestos-Cement Non-Pressure Sewer Pipe Designed for Modern, Economical, Long Life, Non-Pressure Sewer Systems, Published 8/74.

15. Installation Guide CT FLUID-TITE Pressure Pipe, Published 2/74.

16. Avoiding Surge in Asbestos Cement Pipe Lines, Published 6/75.

17. Epoxy-Lined Asbestos-Cement Pipe, Published (estimated date) 1975.

18. FLUID-TITE Asbestos-Cement Gravity Sewer Pipe (ASTM C644) Specifications, Published 8/77.

19. FLUID-TITE Asbestos Cement Small Diameter Sewer Pipe, Published 3/74.

20. Pipe Class Selection - FLUID-TITE Asbestos-Cement Non-Pressure Sewer Pipe, Published 4/74.

EXHIBIT A

21. Engineering Drawings and Dimensions, Asbestos-Cement Non-Pressure Pipe, Couplings and Fittings, Published 7/73.

22. CertainTeed FLUID-TRANSMISSION ASBESTOS-CEMENT PIPE, Design and Specification Manual, Published 1971.

23. How to Make the Toughest Joint In Town Go Dry, Published 5/75.

24. The Right Way To: Receive - Unload - Handle - Store - Install CERTAIN-TEED ASBESTOS CEMENT PIPE AND PIPE ACCESSORIES, Published (estimated) 1978.

25. Asbestos-Cement Pressure Pipe & FLUID-TITE COUPLING, Engineering Drawings And Dimensions And How To Connect To Other Pipe, Published 12/75.

26. FLOW CHART For CertainTeed FLUID-TITE, Asbestos-Cement Pressure Pipe, Published 7/75.

27. A/C Pressure Installation Guide - Distribution and Fluid Transmission Piping Systems (March 1982).

28. Installation Guide Asbestos Cement Fluid-Tite Non-Pressure Sewer Pipe (early 1980).

29. Installation Guide Fluid-Tite Pressure Pipe (early 1977).

30. How to Install A/C Utilizing Closure Couplings & Closure Lengths (June 1986).

EXHIBIT A

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Certain-teed protective products

cements and coatings

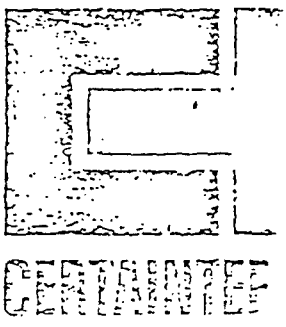


EXHIBIT B

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CERTAINTEED

SPECIFICATIONS

Plastic Cement — Asphalt-solvent blend with asbestos fibers and mineral stabilizer. Easy troweling consistency. Used between plies and as a top coating in flashing specifications. Used to repair damaged roof flashings, caulking, membranes and sheet metal. Good adhesive and anti-sagging properties. FEDERAL SPEC. NO. SS-C-153 TYPE I, ASTM SPEC. NO. D-2822-69.	Apply to dry surface at 40 degrees F or above.	55 gallon 30 gallon 5 gallon 3 gallon 2½ gallon 1 gallon (C
Wet Seal Plastic Cement — Asphalt-solvent blend with asbestos fibers, mineral stabilizers, and surface active agents combined to provide adhesion to wet or damp surfaces. Easy troweling consistency. Used to repair damaged roof flashings, sheet metal, and roof membranes where wet conditions exist. FEDERAL SPEC NO. SS-C-153 TYPE I, ASTM SPEC. NO. D-2822-69.	Apply to wet or dry surfaces at 40 degrees F or above.	5 gallon 1 gallon (G
Blind Nailing Cement — Asphalt-solvent blend with asbestos fibers. Easy troweling consistency. Used to seal laps of SELVAGE EDGE ROOFING applied by the blind nailing method. Provides strong waterproof bond. ASTM SPEC. NO. D-3019-72 TYPE II.	Apply to dry roofing surfaces at 50 degrees F or above.	55 gallon 5 gallon 1 gallon (6
Lap Cement — Asphalt-solvent blend. Very heavy brushing consistency. Used to provide waterproof seal for laps of SMOOTH ROLL ROOFING applied by the face nailed method. ASTM SPEC. NO. D-3019-72 TYPE IA.	Apply to dry roofing surfaces at 50 degrees F or above.	55 gallon 5 gallon 1 gallon (6 1/10 gallon (2
Sealdon Cement — Asphalt-solvent blend with asbestos fibers and mineral stabilizer. Used to seal down shingle tabs on steep slope or mansard roof application. Packaged in handy caulking gun cartridges.	On three tab shingles, apply quarter size portion under each tab; on no-cutout shingles, apply 3 portions equally spaced; on two tab shingles, use 2 portions per tab. Apply at 40 degrees F or above.	1/10 gallon (2 tube with
Cold Process Asphalt — Asphalt-solvent blend with asbestos fibers. Light brushing consistency. Used for cementing and coating plies of SMOOTH ROLL ROOFING applied by the cold process method.	Apply to dry roofing surfaces at 50 degrees F or above.	55 gallon 5 gallon 1 gallon (6

COATINGS

Asbestos Roof Coating — Asphalt and asbestos fiber composition in solvent. Light brushing consistency. Used for coating SMOOTH ROLL ROOFING to extend life and as a black protective paint for metal, wood, or masonry surfaces. FEDERAL SPEC NO. SSA-6940, ASTM SPEC. NO. D-2823-69 (meets specs on special orders only). D	Apply to dry surfaces at 40 degrees F or above.	55 gallon 5 gallon 1 gallon (
Asphalt Roof Coating — Non-fibrated asphalt composition in solvent. Light brushing or spraying consistency. Used for coating SMOOTH ROLL ROOFING in good conditions and to protect metal surfaces.	Apply to dry surfaces at 40 degrees F or above.	55 gallon 5 gallon 1 gallon (
Asphalt Foundation Coating — Asphalt paint with asbestos fibers. Medium brushing consistency. Used for waterproofing Concrete and Masonry surfaces in below grade applications.	Apply to dry concrete or masonry surfaces at 40 degrees F or above.	55 gallon 5 gallon
Asphalt Emulsion — Fibrated or non-fibrated asphalt emulsion. Superior weathering characteristics. Light brushing or spraying consistency. Used for coating SMOOTH ROLL ROOFING, metal and masonry surfaces. MILITARY SPEC NO. MIL-R-3472.	Apply to dampened surfaces at temperatures not below 50 degrees F. Product must not be subjected to temperatures below 40 degrees F prior to application.	55 gallon 5 gallon 1 gallon (

SPECIALTY PRODUCTS

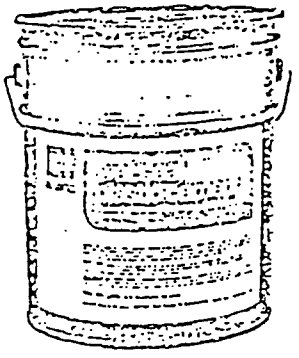
Asphalt or Concrete Primer — Asphalt-solvent blend. Used for priming and waterproofing concrete, metal, and masonry surfaces prior to application of hot asphalt, coatings, or cement. Light brushing consistency. FEDERAL SPEC. NO. SS-A-701, ASTM SPEC. NO. D-41-70.	Apply to dry surfaces at 40 degrees F or above.	55 gallon 5 gallon

EXHIBIT B

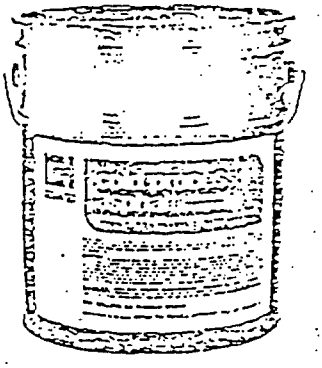
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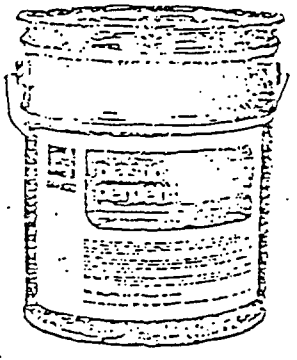
CERTAIN-TEED PROTECTIVE PRODUCTS—CONTROLLED QUALITY

[illegible]	12 @ 1/8" thickness
12 @ 1/8" thickness	
50	
200 linear feet—2" laps	
100 shingle tabs per 1/10 gallon tube	
50	
[illegible]	50—Roofing, masonry or wood 75—metal
75—roofing or masonry 100—metal	
50	
33—roofing or masonry 40—metal	
	100











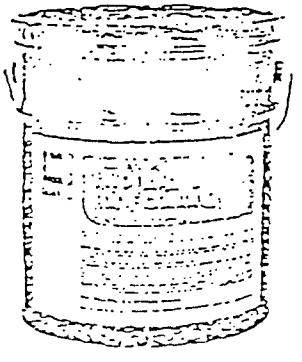


EXHIBIT B

Note: Products and container sizes listed herein are generally available in all geographical areas of the U.S. For specific information regarding product availability in your area call your nearest regional sales office listed on the back cover of this brochure.

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Regional Sales Offices

NORTHEAST
One Regency Drive
Bloomfield, Connecticut 06002
Telephone (203) 243-2567

MIDDLE ATLANTIC
2502 Silverside Road
Wilmington, Delaware 19610
Telephone (302) 478-5910

SOUTHEAST
P.O. Box 13703
6605 Abercorn Street
Savannah, Georgia 31406
Telephone (912) 964-6231

NORTH CENTRAL
3303 East Fourth Avenue
Shakopee, Minnesota 55379
Telephone (612) 445-6450

SOUTH CENTRAL
P.O. Box 8626
7910 South Central Expressway
Dallas, Texas 75216
Telephone (214) 376-5401

MIDWEST
5700 Broadmoor
Suite 1002
Mission, Kansas 66202
Telephone (913) 432-7353

LAKE CENTRAL
P.O. Box 1700, Milan, Ohio 44846
Route 250 & Ohio Turnpike
Avery, Ohio
Telephone (419) 499-4612

CENTRAL
P.O. Box 398
Tenth and State Streets
Chicago Heights, Ill. 60411
Telephone (312) 757-5300

NORTHWEST
P.O. Box 1858 (Sales)
1718 Thorne Road
Tacoma, Washington 98402
Telephone (206) 383-3754

SOUTHWEST
1014 Chesley Avenue
Richmond, California 94804
Telephone (415) 232-7980

MIDSOUTH
3364 Peachtree Road N.E.
Suite 410 4th Floor
Atlanta, Georgia 30326
Telephone (404) 262-2464

In addition to a complete line of protective products, the Shelter Materials Group of Certain-teed Products Corporation markets a complete line of commercial roofing products; a complete line of prepared roofing products, including such proprietary names as the Hallmark Shangle®, Independence Shangle®, Woodlex™, Glasslex™, and Glassguard™; a complete line of Fiberglass Building Insulation and Fiberglass Ceiling Panels; and a complete line of Vinyl Siding Products and accessories.

EXHIBIT B

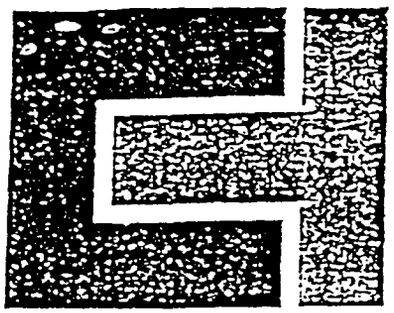
CERTAINTEED

CERTAIN-TEED PRODUCTS CORPORATION, P.O. Box 860, Valley Forge, Pa. 19482

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CERTAINTEED

PROTECTIVE PRODUCTS

CEMENTS

and

COATINGS

EXHIBIT B

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SPECIFICATIONS

CEMENTS	APPLICATION CONDITIONS	CONTAINER SIZE
Blind Nailing Cement — Asphalt-solvent blend with asbestos fibres in troweling consistency for sealing the laps of SELVAGE EDGE ROOFING applied with no exposed nails. Provides strong waterproof bond.	Apply to dry roofing surfaces at temperatures not below 50°F.	55 gallon 5 gallon 1 gallon (6 per case)
Lap Cement — Asphalt-solvent blend of very heavy brushing consistency that provides waterproof seal for laps of ROLL ROOFINGS which are face nailed.	Apply to dry roofing surfaces at temperatures not below 40°F.	55 gallon 5 gallon 1 gallon (6 per case) 1/10 gallon (25 per case)
Plastic Cement — Asphalt-solvent blend with asbestos fibres and mineral stabilizer in easy troweling consistency . . . has good adhesive and anti-sagging properties. Excellent for flashing and caulking, heavy duty repairs, patching on ROOF FLASHINGS, MEMBRANES or METAL. Federal Spec. No. SS-C-153, Type 1.	Apply to dry surfaces at temperatures not below 40°F.	55 gallon 30 gallon 2½ gallon 5 gallon 1 gallon (6 per case) 1 quart (24 per case) 1 pint (36 per case)
Cold Process Asphalt — Light brushing, asphalt-solvent blend with asbestos fibres for cementing and coating plies of SMOOTH ROOFING applied by the cold process method.	Apply to dry roofing surfaces at temperatures not below 50°F.	55 gallon 5 gallon 1 gallon (6 per case)
Sealing Cement — Asphalt-solvent blend with asbestos fibres in thin troweling consistency for sealing the laps of SELVAGE EDGE ROOFING applied by the blind nailing method.	Apply to dry roofing surfaces at temperatures not below 50°F.	55 gallon 5 gallon 1 gallon (6 per case)
Sealdon Cement — Formulation of asphalt-solvent blend with asbestos fibres and mineral stabilizer for sealing down SHINGLE TABS. Packaged in handy caulking gun cartridges.	Apply at center of lower edge of dry shingle tabs. Quantity applied should be no more than 1½" in diameter following impressment of shingle tabs. Temperature should not be below 40°F.	1/10 gallon (25 per case) tube with spouts
Wet Seal Plastic Cement — Asphalt-solvent blend with asbestos, fibres, mineral stabilizers and surface-active agents combined to provide adhesion to wet or damp surfaces. For use in installing or repairing ROOF FLASHING and SHEET METAL. Also for making temporary ROOF MEMBRANE repairs. Federal Spec. No. SS-C-153, Type 1.	Apply to wet or dry surfaces at temperatures not below 40°F.	5 gallon 1 gallon (6 per case) 1 quart (24 per case)
COATINGS		
Asphalt Roof Coating — Black unfibred asphalt coating with sufficient solvent to provide for light brushing or spraying consistency. Primarily for SMOOTH SURFACE ROOFING in good condition. Excellent for METAL surface protection.	Apply to dry surfaces at temperatures not below 40°F.	55 gallon 5 gallon 1 gallon (6 per case)
Asbestos Roof Coating — Asphalt and asbestos fibre composition in solvent for coating SMOOTH SURFACE ASPHALT ROOFS . . . black protective paint for METAL, WOOD, or MASONRY surfaces. Light brushing consistency.	Apply to dry surfaces at temperatures not below 40°F.	55 gallon 30 gallon 5 gallon 1 gallon (6 per case)
Asphalt Emulsion — Fibrated or non-fibrated emulsion with exceptionally good weathering characteristics for coating SMOOTH SURFACE ROOFS, METAL or MASONRY. Brush or spray application. Military Spec. No. MIL-R-3472.	Apply to dampened surfaces at temperatures not below 50°F. Product must not be subjected to temperatures below 40°F prior to application.	55 gallon 30 gallon 5 gallon 1 gallon (6 per case)
Aluminum Asphalt Coating — Asbestos fibered or non-fibered, high light reflectivity, for spray or brush application. For use on all kinds of METAL or SMOOTH ASPHALT ROOFING surfaces, also as a protective finish on any kind of METAL, WOOD or MASONRY surface.	Apply to dry surfaces at temperatures not below 50°F.	5 gallon 1 gallon (6 per case)
Asphalt Foundation Coating — Asphalt paint reinforced with asbestos fibres in medium brushing consistency for the waterproofing of CONCRETE and MASONRY surfaces below ground level.	Apply to dry concrete or masonry surfaces at temperatures not below 40°F.	55 gallon 5 gallon
SPECIALTY PRODUCTS		
Asphalt or Concrete Primer — Asphalt-solvent formulation for priming and waterproofing CEMENT, METAL and MASONRY surfaces in preparation for application of hot mopping asphalt, prepared asphalt coatings or cements. Thin brushing consistency. Federal Specification No. SS-A-701.	Apply to dry surfaces at temperatures not below 40°F.	55 gallon 5 gallon
Black Top Sealer — Can be applied to DRIVEWAYS by broom, squeegee or spray . . . dries for auto traffic in 48 hours.	Apply to broom-cleaned asphalt paving surfaces at temperatures not below 50°F.	55 gallon 5 gallon

EXHIBIT B

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CERTAIN-TEED

Certain-teed Protective Products
...Controlled Quality

APPROX. WT. PER CONTAINER	COVERAGE PER CONTAINER (SQ. FT. PER APPLICATION)
490 lbs. 44 lbs. 54 lbs.	50
478 lbs. 42 lbs. 52 lbs. 25 lbs.	300 linear feet — 2" laps
520 lbs. 318 lbs. 26 lbs. 49 lbs. 60 lbs. 65 lbs. 51 lbs.	12 @ 1/8" thickness
478 lbs. 43 lbs. 53 lbs.	50
528 lbs. 48 lbs. 55 lbs.	50
25 lbs.	100 shingle tabs per 1/10 gallon tube
49 lbs. 60 lbs. 65 lbs.	12 @ 1/8" thickness
473 lbs. 42 lbs. 52 lbs.	75 — roofing or masonry 100 — metal
478 lbs. 275 lbs. 43 lbs. 53 lbs.	50 — Roofing, masonry or wood 75 — metal
495 lbs. 270 lbs. 45 lbs. 55 lbs.	33 — roofing or masonry 40 — metal
45 lbs. 55 lbs.	50 — fibered 100 — non-fibered
475 lbs. 43 lbs.	50
470 lbs. 40 lbs.	100
470 lbs. 40 lbs.	25-50

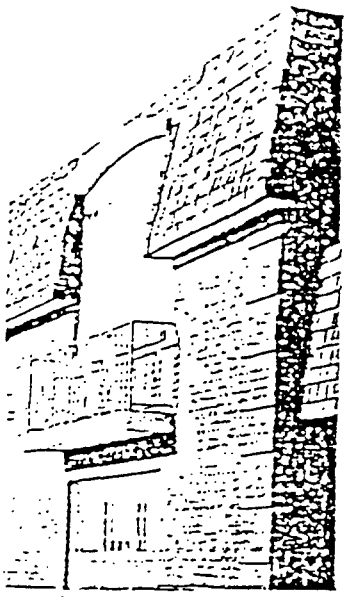


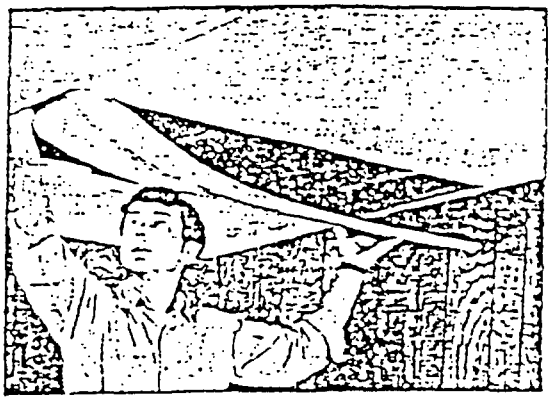
EXHIBIT B

Note: Products and container sizes listed herein are generally available in all geographical areas of the U. S. For specific information regarding product availability in your area contact our dealer representative or call our nearest regional sales office (listed on the back cover of this brochure).

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PREPARED ROOFING
. . . a complete line of asphalt roofing, led by the shingle "that's so new, there is no No. 2" . . . HALLMARK!

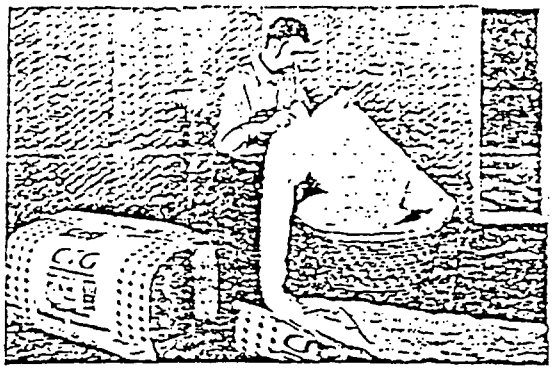




FIBER GLASS CEILING PANELS . . .
an indoor galaxy of quiet beauty, four attractive styles, for use in any building.

VINYL SIDING . . .
made from tough vinyl, guaranteed 20 yrs., never needs paint. Install it and forget it.

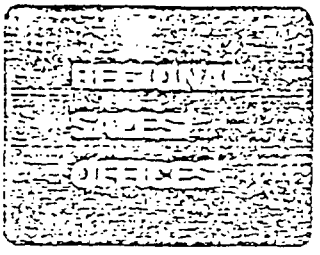




FIBER GLASS INSULATION . . .
exclusive Decorator Insulation for home and commercial construction.

CERTAIN-TEED PRODUCTS CORPORATION
Valley Forge, Pennsylvania 19481

CERTAINTEED



NORTHEAST
2502 Silverside Road
Wilmington, Delaware 19803
Telephone (302) 478-5910

NORTH CENTRAL
401 Main Street, N.E.
P. O. Box 9505
Minneapolis, Minnesota 55440
Telephone (612) 332-8411

CENTRAL
Tenth and State Streets
P. O. Box 398
Chicago Heights, Ill. 60411
Telephone (312) 755-5350

SOUTH CENTRAL
7910 South Central Expressway
P. O. Box 5605
Dallas, Texas 75216
Telephone (214) 376-5401

SOUTHEAST
Foundation Drive
P. O. Box 1846
Savannah, Georgia 31402
Telephone (912) 964-6231

NORTHWEST
1718 Thorne Road
P. O. Box 1959
Tacoma, Washington 98402
Telephone (206) 383-3754

PORTLAND SERVICE CENTER
2345 N. W. 29th Avenue
Portland, Oregon 97210
Telephone (503) 224-7018

LAKE CENTRAL
P. O. Box 1700
Milan, Ohio 44846
Telephone (419) 499-2521

SOUTHWEST
1014 Chesley Avenue
Richmond, California 94804
Telephone (415) 232-7980

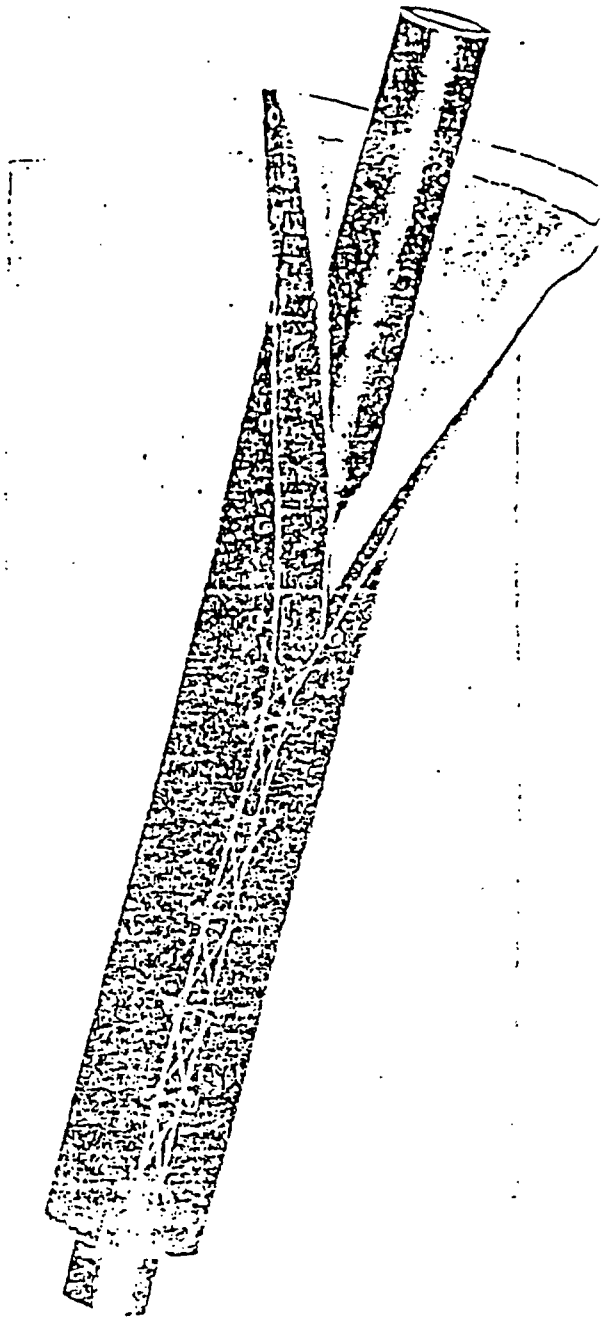
LOS ANGELES WAREHOUSE
6003 Telegraph Road
City of Commerce, CA 90022
Telephone (213) 722-7900

Printed in U.S.A.
1/72

EXHIBIT B

G-B FLEXIBLE TRAIN-LINE INSULATION

superior thermal efficiency **lightweight**



description

G-B Flexible Pipe Insulation is designed especially for insulating steam train-line piping and all exposed water pipes beneath the car floor.

It is composed of Ultrolite glass fiber insulation pads securely cemented to waterproofed heavy asbestos cloth. The Ultralite insulation pad is two inches thick and compresses to one inch when applied to the pipe.

The asbestos backing or jacket is provided with longitudinal sealing flaps and a two-inch overlap at one end of each section to form a moisture-tight assembly. Cadmium plated hooks are securely fastened to the jacket to provide for lacing the section on the pipe with copper wire.

advantages of G-B FLEXIBLE TRAIN-LINE INSULATION

- Superior Thermal Efficiency
- Resists vibration—will not pack or shake down
- Lightweight
- Will not corrode piping
- Will not rot or decay—permanent
- Completely fire resistant
- Double jacket sealing flap shuts out moisture
- Reclaimable

advantages

G-B Flexible Train-Line Pipe Insulation was designed for use where extreme conditions of vibration and wetting require an unusually rugged, yet resilient, pipe insulating material. G-B Flexible Train-Line Pipe Insulation withstands this abuse and can be readily removed and re-applied incident to repair work.

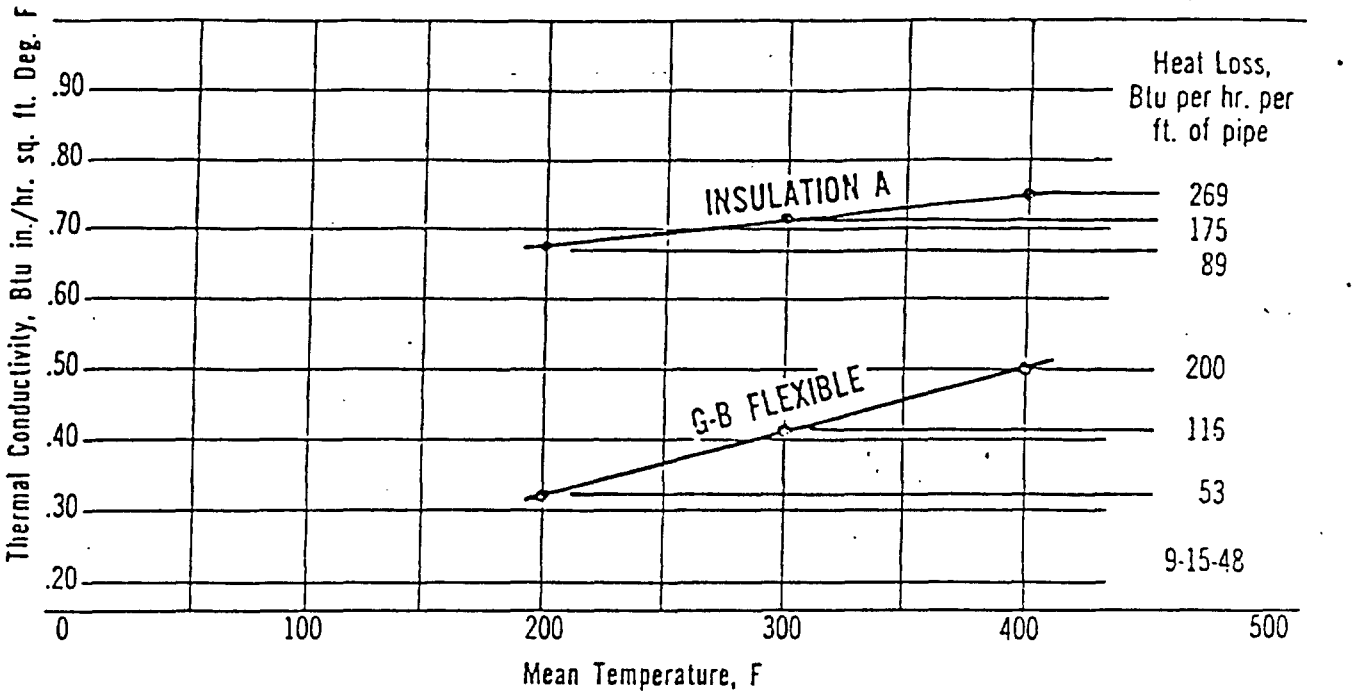
Especially important is the superior thermal efficiency of G-B Flexible Train-Line Insulation. It saves more heat and cold or protects better against freezing than any train-line pipe insulation available today inch-for-inch thickness.

EXHIBIT C

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thermal efficiency

G-B FLEXIBLE TRAIN-LINE INSULATION



Careful thermal efficiency laboratory comparison tests of another train-line type insulation (a) and G-B Flexible Train-Line Pipe Insulation clearly point out the superior thermal performance of G-B Flexible Train-Line Pipe Insulation. Tests were run on 2" iron pipe with 80° surrounding ambient air.

sizes

NOMINAL SIZE		APPROX. WEIGHT
Copper	Steel	Per 3 ft. Section
¾"	.....	1.6#
1"	¾"	1.8#
1¼"	1"	2.0#
1½"	1¼"	2.2#
2"	1½"	2.5#
2½"	2"	2.8#
2¾"	2½"	3.0#
3"	.....	3.2#
3½"	3"	3.4#

Insulated fitting boots for 90° elbows, complete with hooks for lacing, are available. Specify fitting type and size.

CERTAIN-TEED PRODUCTS CORPORATION
GUSTIN-BACON DIVISION
P. O. Box 15079, Kansas City, Kansas 66115 913/621-4717

CERTAIN-TEED

EXHIBIT C

CERTAIN-TEED CORPORATION

Meeting of Board of Directors

January 31, 1978

A regular meeting of the Board of Directors of Certain-Teed Corporation was held at Valley Forge, Pennsylvania, at 11:00 a.m. on January 31, 1978.

EXHIBIT D

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The major challenges for the Pipe & Plastics Group were organizing the new management team and improving the operating performance of the group's plants. The marketing program for asbestos-cement pipe, health hazards and the vinyl siding program were also reviewed.

EXHIBIT D

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