PLAINTIFF'S EXHIBIT FK37

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

(ALL DIVISIONS)

THE FLINTKOTE COMPANY'S RESPONSES TO PLAINTIFF(S) MASTER SET OF INTERROGATORIES AND REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSIONS

1. You are now in the business of manufacturing, selling or distributing products containing asbestos.

ANSWER: Deny.

2. You have been in the past in the business of manufacturing, selling or distributing products containing asbestos.

(a) This was true during a part of the time between 1940 and 1972.

(b) Between 1940 and 1972, your products were sold or distributed in Texas.

(c) After 1972 some of your asbestos products were still in place where installed earlier.

ANSWER: (a-c) Admit.

3. You knew your products inquired about above contained asbestos.

ANSWER: Admit.

4. You gave no warning to the plaintiff(s) in this case of the dangers of asbestos.

ANSWER: Objection. Until and unless plaintiff(s) identifies any specific Flintkote asbestos-containing product(s) to which plaintiff(s) was exposed, Flintkote cannot admit or deny this request.

5. Asbestos is a known cause of asbestosis.

(a) A known cause of mesothelioma.

(b) A known cause of cancer of other bodily organs.

(c) A known cause of lung or bronchial damage.

ANSWER: Objection. This request calls for medical conclusions outside the scope of knowledge of The Flintkote Company and is not reasonably calculated to lead to the discovery of admissible evidence. Flintkote is unable to admit or deny this request.

INTERROGATORIES

1. As to the person answering these interrogatories, state:

   (a) Name;

   (b) Title or position with defendant;

   (c) Business address;

   (d) Length of time employed by defendant;

   (e) State year by year all other positions, titles or jobs that person has held with the defendant.

ANSWER: (a) Clifford J. Carr

(b) Manager - Personnel

(c) 5525 MacArthur Boulevard, Suite 800
Irving, Texas 75038

(d) April 10, 1957 - present

(e) 4/10/57 - Laborer
4/5/61 - Control Superintendent
2/1/69 - Personnel and Safety Manager
5/16/71 - Division Personnel and Insurance Manager
12/1/76 - Salary and EEO Administration
11/1/78 - Personnel and EEO Manager
7/1/79 - Corporate Director of Personnel
11/1/83 - Manager of Personnel and Employee Benefits
5/1/85 - Director of Human Resources

2. State the following concerning this defendant:

(a) Full and correct name;

(b) Principal place of business;

(c) State of incorporation;

(d) Date of incorporation, and name of corporation;

(e) Is this defendant authorized to transact business in the State of Texas? If so, state the date such authority was first issued and last renewed;

(f) Does this defendant have an agent, representative or place of business in Texas? If so, state the name and address of such agent, representative, or place of business.

(g) Does this defendant have an agent for service in the State of Texas? If so, state the name and address of the registered agent.

ANSWER: 2(a) The Flintkote Company

(b) c/o Genstar Corporation
Four Embarcadero Center
Suite 3800
San Francisco, CA 94111

(c) Delaware; originally incorporated in Massachusetts

(d) The Flintkote Company was incorporated by merger in 1982; originally incoporated in Massachusetts in 1917

(e) Yes; Flintkote was issued a certificate of authority to do business in the State of Texas on March 20, 1956.

(f) CT Corporation System
P.O. Box 807
Dallas, Texas 75221

(g) Yes.
CT Corporation System
P.O. Box 807
Dallas, Texas 75221

3. Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 2 above concerning the defendant as correctly named.

ANSWER: Yes.

4. Has this detendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, processed, distributed or contracted to apply insulation products containing asbestos?

ANSWER: No.

5. If the answer to Interrogatory No. 4 is "Yes", then state the following concerning such predecessor(s):

(a) Full and correct name;

(b) The principal place of business;

(c) State of incorporation;

(d) Date of acquisition by defendant;

(e) Was this business authorized to transact business in the State of Texas?

(f) Attach copies of all papers pertaining to the acquisition.

ANSWER: Not applicable.

6. As to any product containing asbestos in any form, has this defendant, or any predecessor(s):

(a) Ever designed such a product?

(b) Manufactured such a product?

(c) Processed such a product?

(d) Sold such a product?

(e) Distributed such a product?

(f) Patented such a product?

(g) Relabeled such a product which was manufactured, sold, or distributed by another company?

ANSWER: (a) - (e) Yes.
(f) No.
(g) Yes.

7. If your answer to No. 6(d) and 6(e) is "Yes", then give the trade name of the products, the year the defendant or predecessor(s) first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER: See Exhibit A for a list of Flintkote's asbestos-containing products and the years in which they were sold and/or distributed by Flintkote. Flintkote discontinued selling and/or distributing asbestos-containing products in March, 1984.

8. In what year did the defendant first begin selling or distributing insulation products containing asbestos?

ANSWER: Flintkote has not manufactured, sold or distributed insulation products containing asbestos within the normal and usual meaning of the term.

9. In what year did the defendant last sell the insulation product which contained asbestos?

ANSWER: See response to Interrogatory No. 8.

10. As to the named defendant or any predecessor(s) or acquired business, state the various types of products, such as blocks, pipe covering, cements, tape, spray-on insulation, mastics, and

cloth, and in connection with each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

ANSWER: See Exhibits A and B.

11. Is your company, as of the date of answering these interrogatories, still manufacturing, selling, or distributing any insulation products containing asbestos? If so, give the brand names of such products, the binding material and date first manufactured.

ANSWER: The Flintkote Company does not, nor has it ever, manufactured, sold or distributed any insulation products containing asbestos within the normal and usual meaning of the term.

12. Were each of your insulation products generally expected to reach, or were packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER: Flintkote has not manufactured, sold or distributed insulation products containing asbestos within the normal and usual meaning of the term.

13. If your answer to Interrogatory No. 12 is "No", with respect to any product, explain in what way the defendant claims its

products were altered or substantially changed after sale or distribution and before reaching the insulation helper or mechanic.

ANSWER: Not applicable.

14. Do you admit that asbestos insulation applicators, helpers or mechanics, were foreseeable users of defendant's asbestos-containing insulation products, such as:

(a) Pipe covering;

(b) Blocks;

(c) Asbestos cloth;

(d) Mastics;

(e) Spray-on insulation;

(f) Rope or tape;

(g) Asbestos sheeting or millboard;

(h) Cements.

ANSWER: No, as Flintkote has not manufactured, sold or distributed asbestos-containing insulation products within the normal and usual meaning of the term.

15. Based upon the material contents of your products, the method of manufacturing, and the method of application for the

purpose of insulation, can your products be generally applied by an insulator without liberating asbestos fibers?

(a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers 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 the year involved.

ANSWER: Flintkote has not manufactured, sold or distributed asbestos-containing insulation products within the normal and usual meaning of the term. With respect to other Flintkote asbestos-containing products, it is the position of The Flintkote Company that the asbestos contained in these products is encapsulated or "bound into" the product and therefore, these products do not release asbestos dust or fibers into the ambient air.

16. Was it a foreseeable use of your asbestos containing insulation products that they may have to be removed, stripped or replaced at any time after installation? If your company contends the plaintiff(s) misused any of your products then state how and under what circumstances your product was misused.

ANSWER: Flintkote has not manufactured, sold or distributed insulation products containing asbestos within the normal and usual meaning of the term.

17. Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to

go to areas where your products were being used or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the finding, and attach results.

ANSWER: Not to our knowledge.

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

ANSWER: Not applicable.

19. Has your company or its predecessor(s) ever conducted any studies concerning the effects of the inhalation of asbestos dust or fibers on one using or being exposed to any of the asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? In answer to this question, give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to whom such reports were given, and the date.

ANSWER: No. Flintkote has never directly conducted or sponsored any such studies, although such studies may have been conducted by various industry organizations by which Flintkote was a member.

20. Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's insulation 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 completed;

(c) Any publication or dissemination of the results of the studies;

(d) The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;

(e) Attach copies.

ANSWER: The Flintkote Company has not manufactured, sold or distributed asbestos-containing insulation products within the normal and usual meaning of the term, nor has it conducted any tests or studies with regard to such products.

21. If your answer to Interrogatory No. 20 is "Yes", state the name and address of such industrial hygienist or hygientists.

ANSWER: Not applicable.

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

(a) How much expended each year on research, etc.;

(b) What percentage of gross sales did your company or its predecessor spend on research concerning the health affects of asbestos.

ANSWER: Yes. The Research Department was established sometime in the 1940's and has operated continuously since that time.

(a-b) Objection. This interrogatory calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objections, Flintkote states that it has not conducted any research concerning the health effects of asbestos.

23. State in detail the purpose, duties and responsibilities of such Research Department.

ANSWER: The Research Department engages in product development, product improvement, and quality testing in regard to all products manufactured by The Flintkote Company.

24. Does your company have, has it ever had, or has your predecessor ever had, a Medical Department? If so, give the year such Medical Department was established, and whether or not such Medical Department has operated continuously since being established.

(a) Name 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. Give the last known address of each.

ANSWER: No.

25. State in detail the duties and responsibilities of such Medical Department.

ANSWER: Not applicable.

26. Prior to 1965, did your company, or any precedessor(s), ever at any time give insulation mechanics or insulation helpers who would be applying or removing your products instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER: Flintkote has not manufactured, sold or distributed asbestos-containing products within the normal and usual meaning of the term. Nonetheless, for any specific asbestos-containing product(s) identified by plaintiff(s), Flintkote will attempt to provide use instructions, upon notice from counsel for plaintiff(s).

27. Did your company, or your predecessor(s), ever place any warning signs on the containers in which asbestos insulation products were packaged?

ANSWER: The Flintkote Company has not manufactured, sold or distributed asbestos-containing insulation products within the normal and usual meaning of the term.

28. If you have answered Interrogatory No. 2 in the affirmative, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your insulation products, or containers?

(b) On what date was such warning actually first placed on your insulation products or containers?

(c) On what date did your insulation products, accompanied by such warning, first reach the insulation contractor?

(d) State the exact wording of the first warning.

(e) State the exact size of the warning printed on your asbestos insulation products or containers.

(f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?

(g) Why did your company or its predecessor(s) place such warning on your asbestos insulation products or containers?

(h) Did your company or its predecessor(s) place such warning on your asbestos insulation products or containers because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion, legal opinion, or other type of communication.

(i) If the wording of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording.

ANSWER: Flintkote assumes that the reference to Interrogatory No. 2 is intended to refer to Interrogatory No. 27. Therefore, not applicable.

29. Did your company or its predecessor(s) ever place any warning directly on any of its asbestos insulation pipe covering itself, block itself, cloth itself, or millboard itself?

ANSWER: Flintkote has not manufactured, sold or distributed any of the products referenced in this interrogatory.

30. Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, or millboard?

ANSWER: The Flintkote Company has not manufactured, sold or distributed any of the products referenced in this interrogatory.

31. Did the warning inquired about in Interrogatories Nos. 29 and 30, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

ANSWER: See response to Interrogatory No. 29.

32. On what date was the sales literature inquired about in Interrogatory No. 31 first provided to distributors or sellers of your company's products, or your predecessor(s)' products?

ANSWER: Not applicable.

33. Has your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER: No.

34. Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

ANSWER: Objection. This interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Withoug waiving any objections, Flintkote states that for any specific asbestos-containing product(s) identified by plaintiff(s), Flintkote will attempt to provide the information requested upon notice from counsel for plaintiff(s).

35. Did your company or any predecessor(s) ever recall any products containing asbestos from the market?

(a) State all details of such recall, giving the name of the product, the time of recall and any further action taken in connection with the recall.

ANSWER: Not to our knowledge.

36. Has your company or its predecessor(s) ever directly advised any contractor to whom you sell your products containing asbestos of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygientist? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor, and the name of each contractor.

ANSWER: No.

37. Prior to 1964 did your company or its predecessor(s) ever manufacture insulation products containing asbestos without a warning? List the years.

ANSWER: Flintkote has not manufactured, sold or distributed insulation products containing asbestos within the normal and usual meaning of the term.

38. After 1964 did you ever manufacture insulation products containing asbestos without a warning? If so, list the name of the product and the years.

ANSWER: Flintkote has not manufactured, sold or distributed insulation products containing asbestos within the normal and usual meaning of the term.

39. Prior to 1970, did your company, or any predecessor(s), ever manufacture and sell a high temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER: No.

40. Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any insulation products containing asbestos? If so, give the brand names of such products and the binding material and date of first manufacture of such product.

ANSWER: The Flintkote Company does not, nor has it ever, manufactured, sold and/or distributed any insulation products containing asbestos within the normal and usual meaning of the term.

41. If your company, or your predecessor(s), ever devised a high temperature heat insulation which does not contain asbestos, state what prompted your company to devise such high temperature heat insulation not containing asbestos.

ANSWER: Not applicable.

42. Has such high temperature heat insulation not containing asbestos performed satisfactorily; that is, is such insulation suitable for the purpose for which it is to be used?

ANSWER: Flintkote has not devised a high temperature heat insulation not containing asbestos. Flintkote has no knowledge with regard to such products.

43. Give the trade names of your high temperature heat insulation products which do not contain asbestos, and state fully what such insulation contains.

ANSWER: Not applicable.

44. State the decade that there first existed manufacturing technology for commercial purposes the use of chemicals and minerals for combining into a high heat insulation product a substitute for asbestos in insulation materials.

ANSWER: Objection. This interrogatory is vague and calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Flintkote has never devised such a product and has no knowledge with respect to these products.

45. To your company's knowledge, in what decade was fiberglas first commercially available for insulation over 350° F.?

ANSWER: Objection. This interrogatory calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

46. In what decade was each of the following products commercially available for use and sale:

(a) Fiberglas;

(b) Calcium silicate;

(c) Mineral wool;

(d) Rock wool;

(e) Foamglass;

(f) Ceramics;

(g) Wood pulp;

(h) Organic pulp.

ANSWER: Objection. This interrogatory calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

47. List all insulation products sold in the 1940's, 1950's and 1960's which did not contain asbestos and give the physical and tensil strength and temperature decomposition data for each product.

ANSWER: Objection. This interrogatory is overbroad, unduly burdensome and calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

48. Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER: No.

49. Did any division of your company or subsidiary company engaged in the contract business of applying insulation products ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer or any exposure to asbestos products. If the answer is "Yes", give the name of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER: Not applicable.

50. List the name of all employees or former employees of your company, any division of your company or predecessor(s) company engaged in the contract business of applying insulation products who, prior to the year 1970, filed claims for workmen's compensation benefits against your company or its workmen's compensation insurance carrier, alleging that such employee was suffering from an occupational lung disease.

ANSWER: Not applicable.

51. In connection with Interrogatory No. 50, give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER: Not applicable.

52. Was your medical department or industrial health department or industrial hygienist responsible for contracting unit employees?

ANSWER: The Flintkote Company has had no contract units. Further, Flintkote has not had a medical department or industrial health department nor has it employed industrial hygienists.

53. Did your company or its predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER: Objection. Any such surveys would have been made in regard to Flintkote's manufacturing facilities and therefore calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

54. State the year that this defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.

ANSWER: Although Flintkote is generally aware of threshold limit values, Flintkote has no records reflecting the date of first knowledge.

55. Was such threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 54 TOTAL dust and not just asbestos dust?

ANSWER: Although Flintkote is generally aware of threshold limit values, Flintkote has no records reflecting the date of first knowledge.

56. State in detail what test, if any, your company every made with regard to the quantity, quality or threshold limit values of asbestos dust or particles to which insulators were exposed while using your products containing asbestos.

(a) If there were any such tests or studies, give the name or names of the person(s) conducting the tests, the date of the tests and attach true copies of any

reports, findings or memorandums concerning such tests or studies.

ANSWER: Certain testing has been conducted at the direction of attorneys for The Flintkote Company in connection with pending litigation, the results of which are protected from disclosure under the attorney work product doctrine and the attorney client privilege. Further, it is the position of The Flintkote Company that the asbestos contained in its products is encapsulated and therefore asbestos dust was not released into the ambient air.

57. When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

(a) Asbestosis;

(b) Mesothelioma;

(c) Lung cancer;

(d) Any other diseases;

(e) With reference to your company give the name of such official who first had such knowledge, information or understanding;

(f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

ANSWER: The Flintkote Company is unable to provide any particular date upon which is became aware of medical articles attempting to establish a relationship between exposure to asbestos and the development of certain diseases. Such knowledge did exist at the time of filing of the first asbestos-related lawsuit against Flintkote, captioned Roderman vs. Combustion Engineering, et al. on April 24, 1972 in the United States District Court for the Northern District of Ohio. In addition, warnings regarding the relationship between exposure to raw asbestos (rather than asbestos-containing products) and the development of certain diseases were received by Flintkote on bags of raw asbestos which it purchased in 1967 and subsequent years. Further, it is the position of The Flintkote Company that the products referenced in Exhibit A are encapsulated asbestos products and therefore cannot be the proximate cause of any health hazards.

58. As to every asbestos product of yours which you have identified in previous interrogatories state specific type or types of asbestos, (i.e. crocidilite, chrysotile, amosite or any others) which your products contained. If you have any percentage figures available, then give the percentage as to each product.

ANSWER: See Exhibit A. Flintkote asbestos-containing products generally contained chrysotile fibers.

EXHIBIT A

FLINTKOTE ASBESTOS INDUSTRIAL PRODUCTS

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
Acid Proof Cement	Van Packer Jt. Cement	Approximately 1956-70	14.5%	Silicate of soda joint cement for Van Packer chimney sections
Acrylic Pavement Coating		1974-1977	3%	Pigmented acrylic latex coating for stone and blacktop embankments
All-Weather Mastic	See Rain Patch	1956-1978 (*ER, NO) 1956-1981 (CH) 1956-1982 (V)		Plastic cement treated to bond to damp surfaces
Aluminum Roof Coating (810-19)		1969-1978 (ER, NO) 1969-1981 (CH) 1969-1982 (V)	10-13%	Aluminum pigmented reflective roof coating
A-G's Coating		1947-70	15%	Spray grade R.R. car cement
Black Joint Cement	Steadfast Cement	1946-60's	20-25%	Knife or gun grade joint sealing compound
R.R. Car Cements		These car cements were made from the late 1940's and discontinued prior to 1968 at ER, NO and CH, depending on shipping destination		All were spray to trowel grade metal protective coatings used by railroad car builders or repair shops
#1 Car Cement			16-17%	
#1 Car Cement-Pullman			13%	
#1 Car Cement-No Oil			18%	
#1 Car Cement-2% Oil			17%	" " " " " " "
#2 Car Cement-No Oil			19%	
#4 Car Cement		" " " " "	16%	" " " " " " "
#6 Car Cement			+15%	
#263 Car Cement		" " " " "	16%	" " " " " " "
#407 Car Cement			+15%	
So. Railway Spl. #97		" " " " "		" " " " " " "
Car Cement (Spray)			13%	
" " " " (Trowel)		" " " " "	22-29%	" " " " " " "
NYC R.R. #1223 F-1		" " " " "		" " " " " " "
Car Cement			15-18%	
" " " F-2		" " " " "		" " " " " " "
Car Cement			23%	
" " " F-3		" " " " "		" " " " " " "
Car Cement			35%	
" " " F-5		" " " " "		" " " " " " "
Car Cement			+15%	

Note: + = Exceeds

4-16-84

* SEE PAGE 7 FOR KEY TO MANUFACTURING LOCATIONS

0266f/10-7-85

Published by AsbestosClaims.Law
asbestosclaims.law/library/23882/28

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
NYC R.R. #1223 F-1 (10% oil) Car Cement " " " F-2 (10% oil) Car Cement IC Car Cement GC L & N Car Cement Missouri-Pacific Car Cement		These car cements were made from the late 1940's and discontinued prior to 1968 at ER, NO and CH, depending on shipping destination " " " " " " " " " "	14-19% 23% 13-15% 16% " " " " " " " 13%	All were spray to trowel grade metal protective coatings used by railroad car builders or repair shops "
Colorcoat	Unimastic 152	Mid-late 1960's to 1975	6%	Latex coating for protection of thermal insulation
Corkcote	Spl. Sanded Premix #5	1950-60	1%	Sand filled asphalt emulsion for protecting cork insulation in freezers
C-13-A (100-14)		Late 1940's-1978 (ER, NO) Late 1940's-1981 (CH) 1940's-1979 (V)	12%	Trowel grade emulsion weather protection for insulation (asphalt base)
C-13-AW		1962-1970	9%	Freeze resistant winter grade C-13-A
C-13-C4 (800-13)	Static Fibrated	1940-1978 (ER, NO) 1940-1981 (CH) 1940-1982 (V)	3%	Brush or spray grade asphalt emulsion roof coating
C-13-LA		1947-1965	3.5%	Light consistency C-13-A
C-13-SA		1954-1965	2%	" " " " " " "
C-19 (110-14)	#213 Underbody Coating	1954-1975 (ER, NO) 1954-1981 (V) 1954-1981 (CH)	20-25%	Brush or spray grade asphalt cutback insulation protective coating
C-20		1965-1967	19.9%	Asphalt protective coating-Spl. run-short lived
Decoralt Coatings Decoralt (920-04) Decobase Binder (920-05) Decobase (920-06) Decocolor MP (920-27) Decoturf (920-30)	Decocolor (920-04)	Late 1950's to 1978	4.5-6.0%	These are pigment and filled latex coatings used primarily for surfacing tennis courts
Formguard Coating (830-11)		1970-76	1%	A resin base coating for use over urethane foam insulation
Fiber Roof Coating (FTC)	Roof Coating (Fibrated) (810-09)	1945-1978 (ER, NO) 1945-1981 (CH) 1945-1982 (V)	6-9%	Spray or brush grade asphalt cutback roof coating

Flintkote's Responses to Plaintiffs' Master Interrogatories and Requests for Admission in the Eastern District of Te… Published by AsbestosClaims.Law
ACL Doc 23882 · Page 29 of 38 asbestosclaims.law/library/23882/29

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
Fibrex Cement	Fibrex I	Early 1940's-1978 (ER, NO) Early 1940's-1981 (CH) Early 1940's-1982 (V)	10%	Asphalt cutback adhesive for cementing roofing base sheets
Filler Coat (900-20)	Tennis Court Resurfacer	1964-1978 (ER, NO) 1964-1981 (CH) 1964-1982 (V)	6%	Sand filled levelling and smoothing compound for pavements
Filler Coat Binder (900-15)	[See Thermalkote 100-15]			Heavy binder for mixing with sand in field to make filler coat compound
Flintdek		WWII-1970	6%	Sand filled resin coating--made surfaces non-slip
FR-100 (130-25)	Unimastic 150	Early 1960's-1978 (ER)	7.5%	Pigment resin coating for insulation --fire retardant
FR-200 (110-26)		1966 to 1970	Approx. 15%	Fire retardant asphalt cutback--made experimentally at New Orleans but then bought for resale. Protection for insulation.
FR-300 (120-14)		Mid 1960's-1978 (ER)	6%	Pigmented latex coating for insulation--fire retardant
GF-8 Tile Cement	R-14-C	Early 1940's-1978 (ER, NO) Early 1940's-1981 (CH) Early 1940's-1982 (V)	10%	Floor tile cement
Hydrostatic Mastic	710-21	1973-1982 (V) West Coast only	15.5%	Semi-Mastic vapor barrier coating
Levelkote (800-39)	See Static Levelkote		2.5%	Brush or spray grade asphalt emulsion roof coating
Monoform C	See Rexalt			Spray grade asphalt cutback roof coating for monoform system
N-13-C4		1960-61	3%	Brush or spray grade asphalt emulsion roof coating
NFR 300		Late 1960's-1975 (ER)	3%	A non-fire retardant version of FR-300-utility coating uses
Nu-Static	Spraykote	1954-1978(ER, NO) 1954-1981 (CH)	6%	A spray grade of C-13-C4 asphalt emulsion roof coating
#14 Emulsion		1954-? - Formulated - Never Produced	6%	Asphalt emulsion--usage unknown

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
#16 Underbody Prot. Ctg.		1954-Mid 1960's	9%	Asphalt emulsion auto underbody protective coating
#54 H.C. Insulation Ctg.		1954-1970	4%	High cork content #54 insulation coating
#54 Insulation Coating		1954-1970	4%	Cork, vermiculite, charcoal filled asphalt emulsion
#69 Insulation Coating		1940's-1970	11%	Cork filled asphalt cutback insulation coating
#201 Insulation Coating		1950-1960	12%	Asphalt Cutback--usage unknown
#213 Underbody Coating	See C-19			
#222 Underbody Coating		1950's-1960	14%	Asphalt cutback--usage unknown
#227 Underbody Coating		1950-1975 (CH, ER)	8.5-17%	Military spec. underbody coating-asphalt cutback
#32	See C-13-A	1959-1965	10%	This is a slightly thinner version of C-13-A for a pvt. label customer
#229 Anti-Sweat CPD.		1947-? Discontinued (NO, ER, CH) 1947-1978 (V)	12%	Cork filled asphalt cutback--for condensation control
#230 Spray-On Deadener		1950-1960	4.5%	Automotive sound deadener-asphalt cutback
#242		1950's-1965	13%	Asphalt cutback--usage unknown
#245		1950's-1974 (CH, ER, NO)	30%	Trowel grade asphalt cutback for underbody coating and waterproofing
#247		1950's-1960	6%	Asphalt cutback--usage unknown
#252 Binderseal		1940's-1960	16%	Sprayable asphalt cutback-building protection-granule embedment
#255		1950-1960	22%	Asphalt cutback--usage unknown
#260 Export Box Sealer		1951-1960	9%	Protective coating for export crates-asphalt cutback
#276		1950-196? - Formulated? if manufactured	5-10%	Asphalt cutback--usage unknown
#349-1		1950-1960's	7%	Rubberized asphalt cutback for automotive sealant

0266f/10-7-85

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
#390		1950-1960's	7%	Rubberized asphalt cutback for automotive sealant
#338 Windshield Sealer		1950-1960	15%	Rubberized asphalt cutback sealer for auto windshields
#830-11 Coating		1956-1965		
#632 Coating		1956-1965	1%	A fire retardant asphalt emulsion for R.R. car builders
#2004 Adhesive		1940's-1966	15%	Silicate of soda high temperature insulation adhesive
#729 (FXF Type)		Mid 1940's-1950's	13%	Rubber cement
#731 (FXF Type)		Mid 1940's-1950's	12%	Rubber cement
#732 (FXF Type)		Mid 1940's-1950's	12%	Rubber cement
#777		Mid 1940's-1950's	14%	Rubber cement
#778		Mid 1940's-1950's	16%	Rubber cement
Plastic Armor Putty		Mid 1940's-1950's	20%	Sealer and caulk for plastic armor-asphalt cutback
Plastic Cement (810-21)		Early 1940's-1978 (ER, NO) Early 1940's-1981 (CH) Early 1940's-1982 (V)	16-19%	Heavy trowel asphalt cutback for roof flashings and repairs
Plastic Foundation Ctg.		1950's-1960	26%	Asphalt cutback waterproofing compound
Roof Coating Fibrated	See Fiber Roof Ctg.			
Rain Patch (810-25)	All Weather Mastic	1969-1978 (ER, NO) 1969-1981 (CH) 1969-1982 (V)	13-19%	Plastic cement treated to bond to wet surfaces
Rexalt Roof Coating		1950-1978 (ER, NO) 1950-1981 (CH)	12-15%	Brush or spray grade asphalt cutback roof coating
Rexglas Coating		1969-1978 (ER, NO) 1969-1981 (CH)	2.5%	Glass fibered asphalt emulsion roof coating
Rex Const. Plastic Binder		Mid 1940's-1950's	9.5%	Asphalt cutback adhesive for roll roofing

Flintkote's Responses to Plaintiffs' Master Interrogatories and Requests for Admission in the Eastern District of Te… Published by AsbestosClaims.Law
ACL Doc 23882 · Page 32 of 38 asbestosclaims.law/library/23882/32

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
Railroad Car Cements	See Car Cements R.R.			
R-14-C	See GF-8			
R-14-D		1946-1965	11%	Trowel grade floor tile cement asphalt cutback
Sewer Joint CPD #293		1949-1960	14%	Heavy trowel grade asphalt cutback for sealing sewer pipe joints
Spl. Sanded Premix #5	See Cork Mastic			
Spraykote	See Nu Static			
Static Asphalt Fibrated	See C-13-C4			
Static Levelkote		1958-1978 (ER, NO) 1958-1981 (CH)	2.5%	Asphalt emulsion for low slope roofs
Steadfast Cement	See Black Joint Cement	1954-1965	21%	
Stik-Tab Cement		1950-1965	13%	Asphalt cutback adhesive for roof shingle tabs
Tennis Court Resurfacer	See Filler Coat (900-20)			
Thermalkote (100-15)	Filler Coat Binder	Late 1940's-1978 (ER, NO) Late 1940's-1981 (CH) Late 1940's-1982 (V)	14-19%	Heavy trowel grade asphalt emulsion-weatherproof coating
Trowel Mastic		1961-1978 (ER, NO) 1961-1981 (CH)	22-25%	Trowel grade asphalt cutback water-proofing compound
Unimastic 150	See FR-100			
Unimastic 152	See Colorcoat			
Van Packer Jt. Cement	See Acid Proof Cement			
Vapor Seal	#710-14 (Ex#65)	1951-1978 (V)	5%	Semi-Mastic asphalt coating for moisture vapor barrier
Viskalt Flashing Cement	See Plastic Cement			Trowel grade asphalt cutback for roof flashings
Weldon Cement East only		1940's-1978 (ER, NO) 1940's-1982 (V) 1940's-1981 (CH)	5%	High strength asphalt cutback adhesive for roof membranes

Flintkote's Responses to Plaintiffs' Master Interrogatories and Requests for Admission in the Eastern District of Te… Published by AsbestosClaims.Law
ACL Doc 23882 · Page 33 of 38 **asbestosclaims.law/library/23882/33**

Product Name	Synonymous Name	Period of Manufacture	% Asbestos	Description
Skykote		1974-1982 West	2%	Pigmented asphalt emulsion (colored roofing coating)
Super Stakool White		1948-1977 West	6%	Cement type dry mix roofing coating

KEY TO MANUFACTURING LOCATIONS

CH = CHICAGO HEIGHTS, IL
ER = EAST RUTHERFORD, NJ
NO = NEW ORLEANS, LA
V = VERNON, CA

0266f/6-6 85

Published by AsbestosClaims.Law
asbestosclaims.law/library/23882/34

ADDITIONAL ASBESTOS PRODUCTS ONCE MANUFACTURED BY FLINTKOTE

Product	Period of Manufacture	Approximate Asbestos Content
Asbestos Cement Board	1950-1970	10-15%
Asbestos Cement Pipe	1962-1977	16%
Asbestos Cement Siding and Roofing Shingles	Approx. early 1950s to early 1970s	10-15%
*Asphalt Saturated Asbestos Felt (Built-up Roofing)	Approx. 1956-1976	65%
Flooring-Asbestos Vinyl Floor Tile	Approx. 1945-1980	8-14%
Fiber Pipe	1959-1972	1-1/2%
Van Packer Chimneys	1958-1971	
(a) Commercial chimneys for those products that used asbestos fiber - (only jackets which are a small part of overall product)		22%
(b) Residential chimneys		20%

* Flintkote purchased the asbestos felt from other manufacturers and merely saturated it with asphalt in their own facilities.

PRODUCTS MANUFACTURED BY OTHERS BUT SOLD BY FLINTKOTE

	Period of Sale	
Joint Treatment Compound	1955-1976	5%
Spray Texture Paint	1974-1976	4-5%
Ceiling Tile (Mid West only)	1973-1974	2%
Asphalt Saturated Asbestos Felt (Built-up Roofing)	Intermittently from approx. 1941-1982	65%
Asbestos Cement Shingles	1960-Mid 1970s	10-15%
Super Stakool White (West Coast only)	1948-1977	6%

Flintkote's Responses to Plaintiffs' Master Interrogatories and Requests for Admission in the Eastern District of Te… Published by AsbestosClaims.Law
ACL Doc 23882 · Page 35 of 38 asbestosclaims.law/library/23882/35

DESCRIPTION OF PACKAGING OF FLINTKOTE ASBESTOS PRODUCTS

Liquid Products: All liquid products are packaged in metal cans ranging in size from 1 to 55 gallons. Each can has a label setting forth the current Flintkote trademark, the name of the product, a general description of the product, direction for use and a limited warranty. This general packaging format has always been used for liquid products.

Floor Tile: All floor tiles are packaged in cardboard cartons. Printed directly on each box is general information including, the Flintkote trademark, the name of the product, a general description of the product, directions for use and a limited warranty. This general packaging format has always been used for floor tile.

Asbestos Cement Pipe: This product line was closed down in 1977. The product was not packaged but rather shipped by pallet. The product contained no written material.

Asbestos Shingles and Board: These products were last manufactured during the early 70's. The products were packaged in paper wrapping. Printed directly on the wrapping was general information including the Flintkote trademark, the name of the product, a general description of the product, directions for use and a limited warranty.

Orangeburg Fibre Pipe: This product was last manufactured in 1972. The product was not packaged. The Flintkote trademark was pressed into the pipe. The product contained no other written material.

Van Packer Chimney: This product was last manufactured in 1971. FLINTKOTE does not keep a historical file of product packages or labels and has no independent knowledge as to how this product was packaged or labeled. (The Van Packer Co. was sold in 1971.)

Ready-Mix Joint Compounds: This product was manufactured by independent companies and sold by FLINTKOTE during the period 1955 through 1976. It was sold in cans ranging in size from 1 to 5 gallons. When

EXHIBIT B

3/30/83

relabeled by FLINTKOTE, the label contained general information including the Flintkote trademark, the name of the product, a general description of the product, directions for use and a limited warranty. The FLINTKOTE Company does not maintain a file of packages/labels of products bought from independent manufacturers and, at this time, has no independent information as to how this particular product was originally packaged.

Powder Joint Treatment Compound: This product was manufactured by independent companies and sold without repackaging/relabeling. It was last sold by FLINTKOTE in 1975 or 76. FLINTKOTE does not maintain a historical file of packages or labels on products brought from independent manufacturers and, at this time, has no independent knowledge as to how this product was packaged.

Spray Texture: This product was manufactured by independent companies and private labeled by FLINTKOTE. It was last sold in approximately 1976. FLINTKOTE does not maintain a historical file of packages or labels and, at this time, has no independent knowledge as to how this product was packaged or labeled.

C E R T I F I C A T I O N

STATE OF TEXAS)
) ss.
COUNTY OF DALLAS)

CLIFFORD J. CARR, being duly sworn, deposes and says that he is Manager-Personnel for defendant THE FLINTKOTE COMPANY, a corporation; that he has read the foregoing Requests for Admissions and Interrogatories; that said responses are based on documents in the files of THE FLINTKOTE COMPANY, and on the knowledge and memory of various employees of THE FLINTKOTE COMPANY; and that such responses are true and correct to the best of his knowledge, information and belief.

EXECUTED THIS 10th day of October, 1985, at Irving, Texas.

Clifford J. Carr
CLIFFORD J. CARR

Sworn to and Subscribed before me
this 10th day of October, 1985.

Deborah C. Barton
NOTARY PUBLIC IN AND FOR SAID
COUNTY AND STATE