PLAINTIFF'S EXHIBIT
tabbies
GF-818

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE: KEY HIGHWAY, FAIRFIELD	*	CIVIL ACTION NO.
AND SPARROWS POINT SHIPYARDS -	*	BML-1.
ASBESTOS CASES	*	ALL CASES

* * * * * * * * * * * * * *

DEFENDANT GAF CORPORATION'S
ANSWERS TO PLAINTIFFS'
INTERROGATORIES AND REQUEST FOR PRODUCTION

Defendant GAF Corporation in answer to the Interrogatories filed against it says:

a. The information supplied in these answers is not based solely upon the knowledge of the executing party but includes the knowledge of the party, his representatives and his attorneys, unless privileged.

b. The word usage and sentence structure used in these answers may be that of attorneys assisting in preparing these answers and does not necessarily purport to be the precise language of the executing party.

INTERROGATORY 1:

State the name, address, telephone number and position of the corporate officer answering these interrogatories.

ANSWER TO INTERROGATORY 1:

These answers to interrogatories have been executed by Jonathan Berger, Vice President . GAF Corporation, 140 West 51st Street, New York, New York 10020.

The following persons have supplied information in response to these interrogatories:

Phillip Bettoli - (retired) - Technical Director - Research Department - GAF Corporation - South Bound Brook, New Jersey 08880;

William Schwingen - Products Manager - Insulation - GAF Corporation - 140 West 51st Street - New York, New York 10020;

William Fassuliotis - Director of Safety and Occupational Health - GAF Corporation - Wayne, New Jersey 07470.

INTERROGATORY 2:

Have any documents and records of the defendant been used or referred to, in connection with the preparation of or [illegible] answers to these interrogatories? If so, for each document referred to, state the following:

a. The number of the question and its subpart;

b. The identity and title of the document;

c. The name and location of the file in which the document was found;

d. The name and location of the file in which the document is presently located;

e. The originator of the document.

ANSWER TO INTERROGATORY 2:

In the course of answering interrogatories over several years, documents have been referred to and various persons have provided information, which documents and persons are presently unidentified by this defendant.

INTERROGATORY 3:

State the names of each person, who was spoken to or who provided information to assist in answering these interrogatories and for each person state the following:

a. The number of each question and its subpart for which such personnel provided information;

b. For each question identified in a., state the name, title and position description of the personnel supplying information;

c. The present location and address of the personnel identified in b;

d. The contents of the information provided.

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ANSWER TO INTERROGATORY 3:

In the course of answering interrogatories over several years, documents have been referred to and various persons have provided information, which documents and persons are presently unidentified by this defendant, except for Phillip Bettoli, (retired), Technical Director - Research Department - GAF Corporation - South Bound Brook, New Jersey 08880; William Schwingen - Products Manager - Insulation - GAF Corporation - 140 West 51st Street - New York, New York 10020; and William Fassuliotis - Director of Safety and Occupational Health - GAF Corporation - Wayne, New Jersey 07470.

INTERROGATORY 4:

State the full and complete legal name under which your company or any predecessor is now doing business and has done business at all times from the date when it began mining, processing, manufacturing and/or selling asbestos products or thermal insulation products and materials up until the present time.

ANSWER TO INTERROGATORY 4:

GAF Corporation was incorporated in Delaware in 1929 as American I.G. Corporation. Its name was changed in 1939 to General Aniline and Film Corporation, and again in 1968 to GAF Corporation. GAF maintains its principal place of business at 140 West 51st Street, New York, New York 10020. On May 26, 1967 GAF merged with The Ruberoid Company, assuming its assets and liabilities. The Ruberoid Company was originally incorporated in New York in 1886 as The Standard Paint Company. This company was succeeded by a company of the same name, which was incorporated in West Virginia in 1889; and that company was in turn succeeded by The Standard Paint Company, incorporated in in New Jersey on June 16, 1905. The name of

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the company was changed to The Ruberoid Company on March 10, 1921. GAF is qualified to do business in Maryland.

INTERROGATORY 5:

Please state in which state or states of the United States or what foreign country [illegible] business incorporated and where its principal place of business is located.

ANSWER TO INTERROGATORY 5:

This defendant is incorporated in Delaware, and its principal place of business is in New York.

INTERROGATORY 6:

Please state whether:

a. Your company is authorized to do business in Maryland;

b. Your company does business in Maryland.

ANSWER TO INTERROGATORY 6:

a. Yes.

b. Yes.

INTERROGATORY 7:

Is your firm now or has it or any of its predecessors ever been engaged in:

a. The mining of asbestos material;

b. The processing and/or refining of asbestos material;

c. The manufacture of asbestos products;

d. The sale and/or distribution of asbestos products.

ANSWER TO INTERROGATORY 7:

a. Yes.

b. Yes.

c. Yes.

d. Yes.

INTERROGATORY 8:

If any subpart of Interrogatory 7 is answered

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affirmatively, state for each such affirmative answer:

a. Each asbestos product mined, processed, manufactured, sold and/or distributed;

b. The inception date for each product;

c. [illegible]cation of each mine, plant, and sales or distribution facility for each product;

d. The name, present address and title of the officers responsible for such facility from its inception to the present time.

ANSWER TO INTERROGATORY 8:

a - b. Calsilite, manufactured from the early 1940's until mid-1970; was a white-colored high temperature pipe covering and block containing approximately 10% amosite, 2% chrysotile, and calcium hydrosilicate and diatamaceous earth. Minor changes in the composition of Calsilite were made in approximately 1957 to facilitate its manufacturing process. Calsilite was unprofitable and thus was discontinued in mid-1970 when it was replaced by asbestos-free Calsilite II, which was similarly unprofitable. Calsilite was manufactured at Gloucester, New Jersey.

115 and 214 Insulation Cements, manufactured from 1936 through September, 1975, were off-white to light-gray colored cements, composed entirely of chrysotile asbestos fiber and used for insulating and finishing boilers, tanks, fittings, etc. Manufacture of these products was discontinued because they were not profitable. These cements were manufactured at Hyde Park, Vermont.

T/NA-100 Insulation Jacketing, manufactured from 1962 to September 1971, was used for covering insulated tanks and for protecting insulated piping. T/NA-100 was a white-colored two-ply laminated product consisting of a layer of asbestos paper in which chrysotile asbestos fibers were bonded with

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Neoprene and a layer of polyvinyl floride (Tedlar) plastic film attached by adhesive on one side. T/NA-100 is covered by U.S. Patent No. 3,300,927 dated January 31, 1967. Manufacture of this product was discontinued because it was not profitable. T/NA-100 was manufactured at South Bound Brook, New Jersey.

Asbestos paper, manufactured from 1928, is a whitish to dark colored chrysotile paper composed of organic materials mixed with asbestos fibers. It is used as a jacketing or pipe wrap.

Millboard, manufactured from 1928, is a gray or off-white colored densely compressed sheet of uniform size and thickness composed of asbestos fiber combined with binding materials. Millboard was formerly used primarily as an industrial fire barrier. Its present uses are limited primarily to the manufacturing of gaskets and insulating components used in consumer products. Asbestos paper and millboard have been manufactured to the present at Erie, Pennsylvania. It has been mnaufactured since 1971 at Whitehall, Pennsylvania, and from approximately 1969 to 1971 in Gloucester, New Jersey.

c. This defendant objects to providing the location of every GAF sales or distribution facility for each product on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The only relevant sales or distribution facilities would be those from which GAF asbestos-containing thermal insulation products were shipped to BSC.

d. This defendant objects to section d. on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence.

INTERROGATORY 9:

State the names and positions of all corporate officers or officials having the responsibility of creating, directing or

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setting the policy of your firm with regard to the mining, manufacturing, processing, sale and/or packaging of asbestos products since 1930.

ANSWER TO INTERROGATORY 9:

Among the corporate officials having the responsibility of creating, directing or setting the policy of GAF with regard to the mining, manufacturing, processing, sale and/or packaging of asbestos products since 1930 are Phillip Bettoli - (retired) - Technical Director - Research Department; William Schwingen - Products Manager - Insulation; and William Fassuliotis - Director of Safety and Occupational Health.

INTERROGATORY 10:

For each asbestos product mined, manufactured, processed, refined, sold or distributed by you since 1930 state:

a. The date you commenced such activities;

b. The generic name of the "asbestos product";

c. The brand name of the "asbestos product";

d. The Trademark name of the "asbestos product";

e. The asbestos content of such "asbestos product";

f. The mineralogical and other constituents of such "asbestos product" and the percentage by weight of each such constituent contained therein.

ANSWER TO INTERROGATORY 10:

Calsilite, manufactured from the early 1940's until mid-1970; was a white-colored high temperature pipe covering and block containing approximately 10% amosite, 2% chrysotile, and calcium hydrosilicate and diatamaceous earth. Minor changes in the composition of Calsilite were made in approximately 1957 to facilitate its manufacturing process. Calsilite was unprofitable and thus was discontinued in mid-1970 when it was replaced by asbestos-free Calsilite II,

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which was similarly unprofitable. Calsilite was manufactured at Gloucester, New Jersey.

115 and 214 Insulation Cements, manufactured from 1936 through September, 1975, were off-white to light-gray colored cements, composed entirely of chrysotile asbestos fiber and used for insulating and finishing boilers, tanks, fittings, etc. Manufacture of these products was discontinued because they were not profitable. These cements were manufactured at Hyde Park, Vermont.

T/NA-100 Insulation Jacketing, manufactured from 1962 to September 1971, was used for covering insulated tanks and for protecting insulated piping. T/NA-100 was a white-colored two-ply laminated product consisting of a layer of asbestos paper in which chrysotile asbestos fibers were bonded with Neoprene and a layer of polyvinyl floride (Tedlar) plastic film attached by adhesive on one side. T/NA-100 is covered by U.S. Patent No. 3,300,927 dated January 31, 1967. Manufacture of this product was discontinued because it was not profitable. T/NA-100 was manufactured at South Bound Brook, New Jersey.

Asbestos paper, manufactured from 1928, is a whitish to dark colored chrysotile paper composed of organic materials mixed with asbestos fibers. It is used as a jacketing or pipe wrap.

Millboard, manufactured from 1928, is a gray or off-white colored densely compressed sheet of uniform size and thickness composed of asbestos fiber combined with binding materials. Millboard was formerly used primarily as an industrial fire barrier. Its present uses are limited primarily to the manufacturing of gaskets and insulating components used in consumer products. Asbestos paper and millboard have been manufactured to the present at Erie, Pennsylvania. It has been

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manufactured since 1971 at Whitehall, Pennsylvania, and from approximately 1969 to 1971 in Gloucester, New Jersey.

INTERROGATORY 11:

With respect to each asbestos product referred to in Answer (10), or which were made available to BSC directly or indirectly, or which were sold to any other defendant, state:

a. The full description of each product;

b. The intended use of the product;

c. The form in which the product is sold, e.g., bags, drums, boxes, etc.;

d. Does the asbestos product have to be cut, sawed, shaped, mixed or otherwise worked before or during application or use. If so, describe what the user had to do before applying and using the product.

ANSWER TO INTERROGATORY 11:

Calsilite

a. A white-colored high temperature pipe covering and blocks.

b. Pipe covering.

c. Corrugated cardboard boxes.

d. Calsilite was packaged pre-cut in various lengths and attached by the use of a metal band. Very little cutting was necessary. When it was necessary to cut on the job at the point of application, the applicator could use either a hand or power saw for that operation.

115 and 214 Insulation Cements

a. Off-white to light-gray colored cements.

b. Insulating and finshing boilers, tanks, fittings, etc.

c. Heavy bags.

d. 115 and 214 Insulation Cements were mixed with water into a heavy paste consistency and then applied with a trowel.

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T/NA-100 Insulation Jacketing

a. White-colored two-ply laminated product.

b. Covering insulated tanks and for protecting insulated piping.

c. Corrugated cardboard boxes.

d. T/NA-100 produced little if any dust during its application because it was saturated with Neoprene. Any cutting would usually be done on a band saw, and due to the nature of the product, would not result in any appreciable dust.

Asbestos paper

a. Whitish to dark colored paper.

b. Jacketing or pipe wrap.

c. Corrugated cardboard boxes.

d. Asbestos paper is generally cut by mechanical knife or die-cut on a punch press.

Millboard

a. Gray or off-white colored densely compressed sheet of uniform size and thickness.

b. Millboard was formerly used primarily as an industrial fire barrier. Its present uses are limited primarily to the manufacturing of gaskets and insulating components used in consummer products.

c. Corrugated carboard boxes.

d. Millboard is generally cut by a mechanical knife or die-cut on a punch press.

INTERROGATORY 12:

Have you at any time since 1930, directly or indirectly sold, delivered or supplied any asbestos products or any other products used for thermal insulation (whether an asbestos product or not) to BSC.

ANSWER TO INTERROGATORY 12:

This defendant objects to this interrogatory on the grounds

that it is overly broad, unduly burdensome and not drafted in a fashion precise enough, nor calculated to lead to the discovery of admissible evidence. The only relevant shipments of GAF's asbestos-containing thermal insulation products could be those made to jobsites on which and during years in which plaintiff actually worked. Subject to this objection, GAF responds: Yes.

INTERROGATORY 13:

If Interrogatory 12 is answered in the affirmative, state for each such sale, delivery, or supply:

a. The date of each sale or delivery;

i. The invoice number;

ii. The purchase order;

b. The generic name of the asbestos product or insulation product;

c. The brand name of the asbestos product or insulation product;

d. The Trade name of the asbestos product or insulation product;

e. The chemical composition of such asbestos product or insulation product;

f. The mineralogical constituents of each asbestos product or insulation product and the percentage, by weight, of each constituent;

g. The quantity of each such sale or delivery;

h. The price paid by BSC for the shipment;

i. The department and officer or employee at BSC who:

1. Placed the order;

2. Accepted delivery;

k. The department and officer or employee at your company who:

1. Accepted the order;

2. Packaged the order;

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3. Shipped the order;

4. Has possession of the records concerning each shipment.

ANSWER TO INTERROGATORY 13:

This defendant sold, delivered or supplied the following products to BSC:

BETHLEHEM STEEL/BALTIMORE

Year	Invoice No.	Product	Dollar Value of Sales	Nur of I
1966	00581	1-1/2" calsilite section 3" pipe covering	$414.50	
		1-1/2" calsilite section 6" pipe covering	100.98	
		1-1/2" calsilite section 3/4" pipe covering	317.52	
	00609	1-1/2" calsilite section 3/4" pipe covering	83.35	
	00617	1-1/2" calsilite section 2" pipe covering	523.58	
		1-1/2" calsilite section 4" pipe covering	159.19	
		1-1/2" calsilite section 7" pipe covering	38.88	
		1-1/2" calsilite section 8" pipe covering	243.21	
		1-1/2" calsilite section 1-1/2" pipe covering	490.86	
1970	14426	calsilite blocks 1-1/2"	377.78	
		calsilite blocks 3"	343.44	
1971	14586	1" calsilite section 1-1/2" pipe covering	143.64	
		1-1/2" calsilite section 2" pipe covering	41.26	
		1-1/2" calsilite section 3" pipe covering	98.50	
		1-1/2" calsilite section 4" pipe covering	25.44	
		2" calsilite section 8" pipe covering	232.56	

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	15906	calsilite blocks 1"	31.10	10
		calsilite blocks 1-1/2"	155.52	36
	16092	1-1/2" calsilite section 6" pipe covering	30.00	2
		2" calsilite section 9" pipe covering	56.88	2
		2" calsilite section 16" pipe covering	469.92	13
		2-1/2" calsilite section 4" pipe covering	162.92	8
		2-1/2" calsilite section 5" pipe covering	189.84	8
		2-1/2" calsilite section 6" pipe covering	393.66	16
		2-1/2" calsilite section 2-1/2" pipe covering	121.80	8
	16127	2" calsilite section 12" pipe covering	142.80	5
	16185	2" calsilite section 16" pipe covering	64.08	1
		3" calsilite section 8" pipe covering	550.80	16
	16256	3-1/2" calsilite section 5" pipe covering	275.16	8

BETHLEHEM STEEL/SPARROWS POINT

Year	Invoice No.	Product	Dollar Value of Sales	Numb of Un
1965	12496	4" calsilite section 8" pipe covering	$280.80	6
		4" calsilite section 10" pipe covering	104.94	1
		4" calsilite section 16" pipe covering	46.32	
		calsilite blocks 2"	144.18	27
1966	00363	1" calsilite section 2" pipe covering	145.80	45
		1" calsilite section 3" pipe covering	109.35	27
		1" calsilite section 4" pipe covering	72.90	13

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1" calsilite section 6" pipe covering	90.72	126
1" calsilite section 1/4" pipe covering	11.88	6[illegible]
1" calsilite section 1/2" pipe covering	80.19	405
1" calsilite section 2-1/4" pipe covering	36.45	150
1" calsilite section 2-1/2" pipe covering	86.40	240
1-1/2" calsilite section 1" pipe covering	101.09	216
1-1/2" calsilite section 2" pipe covering	129.60	225
1-1/2" calsilite section 4" pipe covering	38.02	48
1-1/2" calsilite section 5" pipe covering	32.40	36
1-1/2" calsilite section 6" pipe covering	106.92	108
1-1/2" calsilite section 8" pipe covering	58.08	48
1-1/2" calsilite section 9" pipe covering	259.20	192
1-1/2" calsilite section 10" pipe covering	35.52	24
1-1/2" calsilite section 12" pipe covering	29.88	18
1-1/2" calsilite section 14" pipe covering	23.88	12
1-1/2" calsilite section 1-1/2" pipe covering	77.76	144
1-1/2" calsilite section 2-1/2" pipe covbering	34.02	54
2" calsilite section 2" pipe covering	48.60	54
2" calsilite section 4" pipe covering	130.68	108
2" calsilite section 6" pipe covering	165.60	120
2" calsilite section 10" pipe covering	220.32	102

	2" calsilite section 2-1/2" pipe covering	113.40	1:
	3" calsilite section 3" pipe covering	82.08	4
	calsilite blocks 1"	61.56	27
	calsilite blocks 1-1/2"	184.68	5
	calsilite blocks 2"	246.24	54
01309	1" calsilite section 1" pipe covering	38.40	30
	1" calsilite section 2" pipe covering	340.17	2,00
	1" calsilite section 3" pipe covering	131.00	61
	1" calsilite section 4" pipe covering	182.33	64
	1" calsilite section 5" pipe covering	33.76	10
	1" calsilite section 6" pipe covering	40.13	10
	1" calsilite section 1/2" pipe covering	87.05	83
	1" calsilite section 3/4" pipe covering	101.57	89
	1" calsilite section 1-1/4" pipe covering	74.98	52
	1" calsilite section 1-1/2" pipe covering	149.76	96
	1" calsilite section 2-1/2" pipe covering	13.04	6
	1" calsilite section 3-1/2" pipe covering	12.04	5
	1-1/2" calsilite section 2" pipe covering	68.18	22
	1-1/2" calsilite section 3" pipe covering	136.08	37
	1-1/2" calsilite section 4" pipe covering	40.03	9
	1-1/2" calsilite section 5" pipe covering	17.03	3
	1-1/2" calsilite section 6" pipe covering	75.02	14

	1-1/2" calsilite section 8" pipe covering	64.87	1
	1-1/2" calsilite section 10" pipe covering	18.70	
	1-1/2" calsilite section 12" pipe covering	15.71	1
	1-1/2" calsilite section 2-1/2" pipe covering	26.81	8
	1-1/2" calsilite section 3-1/2" pipe covering	74.50	19
	2" calsilite section 6" pipe covering	9.66	1
	2" calsilite section 8" pipe covering	34.09	3
	2-1/2" calsilite section 14" pipe covering	176.70	9
	2-1/2" calsilite section 18" pipe covering	351.90	15
	2-1/2" calsilite section 20" pipe covering	30.00	1
	2-1/2" calsilite section 21" pipe covering	15.60	
	calsilite blocks 1"	121.61	1,00
	calsilite blocks 1-1/2"	194.40	1,08
01310	1-1/2" calsilite section 8" pipe covering	18.15	15
	1-1/2" calsilite section 10" pipe covering	75.48	51
	1-1/2" calsilite section 12" pipe covering	14.94	9
	1-1/2" casilite section 16" pipe covering	6.69	3
01398	1" calsilite section 1" pipe covering	333.15	1,371
	1" calsilite section 3/8" pipe covering	428.87	2,166
	1" calsilite section 1/2" pipe covering	187.11	945
	1" calsilite section 3/4" pipe covering	549.50	2,544
	1" calsilite section 1-1/4" pipe covering	148.23	549

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	1" calsilite section 2-1/2" pipe covering	120.96	336
	1-1/2" calsilite section 1" pipe covering	44.93	96
	1-1/2" calsilite section 2" pipe covering	6.91	12
	1-1/2" calsilite section 3" pipe covering	6.16	9
	1-1/2" calsilite section 4" pipe covering	4.75	6
	1-1/2" calsilite section 3" pipe covering	10.80	12
	1-1/2" calsilite section 6" pipe covering	8.91	9
	1-1/2" calsilite section 2-1/2" pipe covering	13.23	21
	2" calsilite section 5" pipe covering	16.68	12
	2" calsilite section 6" pipe covering	73.44	48
	2" calsilite section 2-1/2" pipe covering	45.36	48
	2-1/2" calsilite section 5" pipe covering	39.69	21
	2-1/2" calsilite section 10" pipe covering	8.22	3
	2-1/2" calsilite section 16" pipe covering	107.73	27
	2-1/2" calsilite section 26" pipe covering	106.68	21
	2-1/2" calsilite section 30" pipe covering	307.26	54
	calsilite block 2"	567.72	1,245
01548	1" calsilite section 6" pipe covering	8.64	12
	1" calsilite section 1/2" pipe covering	479.36	2,421
	1-1/2" calsilite section 1-1/4" pipe covering	43.85	87
	1" calsilite section 2" pipe covering	797.04	246
	2-1/2" calsilite section 28" pipe covering	16.35	3

2-1/2" calsilite section
33" pipe covering 37.38

Calsilite was a white-colored high temperature pipe covering and block insulation containing approximately 10% amosite, 2% chrysotile, and calcium hydrosilicate and diatamaceous earth.

GAF maintains at its offices in New York, New York; Gloucester, New Jersey; and South Bound Brook, New Jersey certain shipping records of asbestos-containing thermal insulation products. The information contained therein is retrievable by reference of year, company shipped to and/or jobsite shipped to. Pursuant to Federal Rule 33(c), this defendant will permit plaintiff to review such records at a mutually convenient time, and at GAF's offices.

INTERROGATORY 14:

With regard to each order specified in Answer 13, state whether:

a. You provided BSC with specifications concerning the products sold;

b. BSC provided product specifications to you concerning the products it ordered from you;

c. You provided BSC with any advertising or promotional material or technical information;

d. You provided any instructions concerning the proper use of the material;

e. You provided any warnings regarding the products you sold and/or delivered;

f. You provided any warranties concerning the products.

ANSWER TO INTERROGATORY 14:

With regard to product specifications, Calsilite block and pipe covering contained approximately 10% amosite, 2% chrysotile, and calcium hydrosilicate and diatamaceous earth.

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In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In approximately 1972, this warning was further changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID BREATHING DUST.

INTERROGATORY 15:

If any part of Interrogatory 14 is answered in the affirmative, identify each such document by:

a. Date;

b. Title and identification number;

c. Name of person who prepared it;

d. Name of person who authorized its use;

e. Present location and custodian of the document.

ANSWER TO INTERROGATORY 15:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY 16:

For each asbestos product referred to in Answer (10), or which was made available to BSC directly or indirectly or which was sold to any other defendant, state separately:

a. The date the product was first commercially sold;

b. The date and place where the product was designed or developed;

c. The identity and present whereabouts of the person or persons responsible for the design testing or development of the product;

d. The identity and present location of all records describing and dealing with the design asbestos and development of the product;

e. For each asbestos product that your firm did not develop, state the circumstances under which your firm began to sell or manufacture such asbestos product.

ANSWER TO INTERROGATORY 16:

a. Calsilite - early 1940's;
115 and 214 Insulation Cements - 1936;
T/NA-100 Insulation Jacketing - 1962;
Asbestos paper - 1928; and
Millboard - 1928.

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b - e. GAF assumes that the testing records referred to in subpart (d) refer to testing during the design or development of the product. If some other definition is intended, GAF objects to the term "testing" on the grounds that it is vague and ambiguous. GAF does not have requested information for the products listed in (a) except for the product "T/NA-100." As indicated in the description of that product, in the Answer to Interrogatory No. 8, it was essentially a combination of existing materials. GAF does not have the information requested in this interrogatory with respect to the development or design of the component materials of "T/NA-100." To the extent this interrogatory seeks information as to the development or design of the particular process by which these materials were combined, GAF objects to the interrogatory on the grounds that it has no relevance to the subject matter of the action and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY 17:

With respect to each asbestos product referred to in Answer (10), or which was made available to BSC directly or indirectly, or which was sold to any other defendant, state separately whether you gave any consideration to the possibility of inhalation of asbestos fibers by users of the product. If so:

a. Describe, in detail, the factors considered;

b. Give the date, location and names of participants at each meeting where the matter was discussed or considered;

c. Identify each document recording such consideration by date, title, file designation, author and present location.

ANSWER TO INTERROGATORY 17:

In approximately 1964, GAF became aware of opinions

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expressed by some members of the medical profession such as Dr. Irving Selikoff that asbestosis could occur among insulation workers, although the opinion did not relate specifically to the use of our products.

INTERROGATORY 18:

With respect to each asbestos product referred to in Answer (10), or which was made available to BSC, directly or indirectly, or which was sold to any other defendant, state whether any instructions, operating instructions or warnings (hereinafter referred to as "warnings") were given to purchasers of the product or directed to the users of the product. If so, state separately for each product:

a. The verbatim content of each warning;

b. The exact date defendant determined to use the warning;

c. The exact date each warning was first used;

d. The date defendant contends each of its asbestos products had a warning affixed to it;

e. The name, title and present address of the author of each such warning;

f. Whether the warnings were communicated or delivered to any distributor, and if so, state the name, address and telephone number of the persons who communicated and who received the warnings and the date delivered to the distributor;

g. Whether the warnings were communicated or delivered to the purchaser, and if so, state the name, address and telephone number of the persons who communicated and who received the warnings and the date delivered to the purchaser;

h. Whether the warnings were physically attached to the product itself when sold and/or delivered by you, and if so, the method of attachment;

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i. Whether any studies, evaluations or analyses of any potential hazards of your asbestos products were conducted by you prior to your use of each of the warnings and/or instructions. If so, identify the study by date, author, title and file number and state its present location;

j. Whether you have a copy of the warnings and/or instructions in your possession at the present time, and if so, where it is located.

ANSWER TO INTERROGATORY 18:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

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In approximately 1972, this warning was further changed to read as follows:

CAUTION

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INTERROGATORY 19:

State whether you have ever discussed or considered the effect giving such warnings referred to in 14, would have on sales of products containing asbestos? If so, please state:

a. The form of the consideration or discussion;

b. The date of the discussion or consideration;

c. If the consideration or discussion occurred at a meeting, the names and present business and home addresses of those attending;

d. The location and identifying codes of any records of such considerations or discussions;

e. Whether you discussed or considered the effect such warning(s) would have on sales of the product;

f. Whether you considered or discussed the costs that would be incurred in preparing and using such label;

g. Whether consideration was given to the effect any particular language used in a warning might have on sales.

ANSWER TO INTERROGATORY 19:

No, not to the best of our knowledge.

INTERROGATORY 20:

Did you ever consider the resultant effect on sales of your asbestos products, of the public knowing of health hazards linked or allegedly linked to asbestos? If so, please state:

a. The form of consideration;

b. The date of the consideration;

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c. The names of each person who considered the matter;

d. If the consideration occurred at a meeting, the names and present business and home addresses of those attending;

e. The location and identifying codes of all records of such consideration.

ANSWER TO INTERROGATORY 20

No, not to the best of our knowledge.

INTERROGATORY 21:

Have you ever imposed or considered any restriction or limitation on the use of the asbestos products referred to in Answer (10), or made available to BSC directly or indirectly, or sold to any other defendant? If so, state separately for each product:

a. The verbatim content of each limitation indicating which product it applied to;

b. The date it was first imposed;

c. The reason for imposing the restriction or limitations;

d. If the reason for the restriction is stated in any document, identify each document by date, author, title and state where it is presently located;

e. The person responsible for imposing the restriction or limitation;

f. If the limitation or restriction was communicated to purchasers of the product, state how this was communicated and if in writing, identify the communication and attach a copy to your answer;

g. If not imposed, state why not.

ANSWER TO INTERROGATORY 21:

This defendant imposes restrictions or limitations on the

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use of its asbestos products in the form of the following warranties:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

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In approximately 1972, this warning was further changed to read as follows:

CAUTION

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INTERROGATORY 22:

Did you, at any time since 1930, ever consider providing any warnings, using any caution label or imposing any restriction on the use of your asbestos products. If so, state separately for each time the matter was considered:

a. The form of the consideration;

b. The date of the consideration;

c. If the consideration occurred at a meeting, the names and present business and home addresses of those attending;

d. The substance of the consideration;

e. The location and identifying codes of any records of such consideration;

f. What language would be used in each label and whether you considered the effect such language would have in:

i. providing an adequate warning;

ii. depressing sales of the product;

g. What were the various sizes of labels that were considered and the substance of the discussion;

h. Where each label or warning was to be placed on the product and the substance of any pertinent discussions.

ANSWER TO INTERROGATORY 22:

This defendant considered providing warnings on the use of its asbestos products, and it provided the following warnings:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

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IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

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In approximately 1972, this warning was further changed to read as follows:

CAUTION

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INTERROGATORY 23:

At the time of the development of or at the time of the decision to manufacture or sell each asbestos product listed in Answer (10), or made available to BSC directly or indirectly, or brought from or sold to any other defendant, did you attempt to determine whether the product complied with any then applicable safety standards, safety orders, regulations, laws, rules and design requirements of any city, county, state, or the Federal Government of the United States:

a. If the answer is in the negative, please state the reasons for not conducting such an analysis and identify

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the name of the persons deciding not to conduct the analysis;

b. If the answer is in the affirmative, identify those safety standards, safety orders, regulations, laws, rules, or other ordinances which you claim you considered.

ANSWER TO INTERROGATORY 23:

GAF is not aware of any safety standard, safety order, regulation, law or rule of any state or of the Federal Government which dealt specifically with the regulation of asbestos products at the various times Calsilite, 115 and 214 insulation cements, T/NA-100 Insulation Jacketing, Asbestos paper and millboard were developed.

INTERROGATORY 24:

At the time of the development of, or at the time of the decision to manufacture or sell, each asbestos product listed in Answer (10), or made available to BSC directly or indirectly or sold to or bought from any other defendant, did you attempt to determine whether the product complied with any applicable safety standards, orders or rules, regulations or design, requirements promulgated by any professional society or association or government body?

a. If the answer is in the negative, please state the reasons for not conducting such an analysis and identify the name of the person deciding not to conduct the analysis;

b. If the answer is in the affirmative, identify the safety standards, safety orders, rules, regulations, which you claim you considered by naming the title, number, page and date of the regulation, and identifying the place where a copy can be obtained of said regulation.

ANSWER TO INTERROGATORY 24:

GAF is not aware of any safety standards, orders or rules, regulations or design requirements which dealt specifically with the regulation of asbestos products at the various times

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Calsilite, 115 and 214 insulation cements, T/NA-100 Insulation Jacketing, Asbestos paper and millboard were developed.

INTERROGATORY 25:

With respect to each asbestos product listed in Answer (10), or made available to BSC directy or indirectly or which was sold to any other defendant, state whether there has been any change, alteration or modification (hereinafter collectively called "change") from the time when it was first developed or you began to manufacture or sell it, to the present. If so state:

a. The nature of each such change;

b. The reason for each such change;

c. The details of how the changed product differed from the original product;

d. The names of each person recommending and/or approving such change;

e. The date each change was accepted by you and made commercially available;

f. Whether there were any studies, evaluations or tests made in connection with such change, and if so, identify each such study by title, date, name of author and present location and custodian.

ANSWER TO INTERROGATORY 25:

Minor changes in the composition of Calsilite were made in approximately 1957 to facilitate the manufacturing process. The formulation of Calsilite was changed in July or August, 1971. At that time an asbestos-free Calsilite was briefly placed on the market. Its manufacture was discontinued in the same year. The asbestos-free product was discontinued because it was unprofitable. The changes were overseen by Dr. Gordon (deceased) and Phillip Bettoli (retired).

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INTERROGATORY 26:

Did defendant ever recommend to purchasers or users of the asbestos products listed in Answer (10), or to BSC, or any other defendant, with respect to asbestos products sold or made available to them, directly, or indirectly, that respirators, protective masks and/or protective clothing be worn while working with, installing or removing the product? If so, state separately for each product:

a. The date or dates when each such recommendation was made;

b. The date or dates when each such recommendation was made to all users;

c. Who made the recommendation;

d. Who received the recommendation;

e. If oral, the manner and substance of the recommendation;

f. If written, identify the document by title, date, file designation and author of each such recommendation and the location and present custodian of each such recommendation.

ANSWER TO INTERROGATORY 26:

Yes. This defendant made such recommendations by means of the following warnings on its asbestos products:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

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IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT

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POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

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In approximately 1972, this warning was further changed.

INTERROGATORY 27:

Whether or not your company ever made the recommendations referred to in Interrogatory 26, did your company consider making them since 1930. If so, state separately for each consideration:

a. The form of the consideration and the result;

b. The date of the consideration;

c. If the consideration occurred at a meeting, the names and present business and home addresses of those attending;

d. The substance of the recommendations discussed;

e. The location and identifying codes of any records of such considerations.

ANSWER TO INTERROGATORY 27:

This defendant does not have records which would provide the information requested in this interrogatory.

INTERROGATORY 28:

If you performed any acts which altered the asbestos products between the time they came into your possession and

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the time they were delivered to BSC describe:

a. The form the asbestos products were in when they first came into your possession;

b. What alteration you made to the asbestos product;

c. The reason for the alteration made by you before you shipped the asbestos product to BSC.

ANSWER TO INTERROGATORY 28:

This defendant objects to this interrogatory on the ground that the term "altered" is vague and ambiguous.

INTERROGATORY 29:

Do you claim you provided any warnings, instructions of information as to the dangers of asbestos inhalation when you sold, shipped, delivered or supplied each order of asbestos products to BSC. If so, for each shipment:

a. Describe in detail each such warning, instruction or information given;

b. State the date of each such warning;

c. State whether such warning, instruction or information was oral or written;

d. If oral, identify the substance of the warning instruction or information given and the date and name of the person at BSC to whom given;

e. If written or printed, attach a copy of each warning, instruction and information, identify each by date, title and reference number and state the manner and location whereby it was transmitted to users of the product.

ANSWER TO INTERROGATORY 29:

This defendant provided the following warnings on its asbestos products:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

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CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

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In approximately 1972, this warning was further changed to read as follows:

CAUTION

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INTERROGATORY 30:

Specify all correspondence (other than the invoice and purchase orders referred to in Interrogatory 13) between you and Bethlehem Steel's Corporate Shipbuilding Offices or the shipyards listed in Instruction 1 by:

a. Document number;

b. Subject matter;

c. Date;

d. Name and title of sender;

e. Name and title of addressee and state where such documents are presently located and the name of the custodian of such documents.

ANSWER TO INTERROGATORY 30:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence. The only relevant shipments of GAF's asbestos-containing thermal insulation products could be those made to jobsites on which and during years in which plaintiff actually worked. Subject to this objection, GAF responds that it maintains at its offices in New York, New York; Gloucester, New Jersey; and South Bound Brook, New Jersey certain shipping records of asbestos-containing thermal insulation products. The information contained therein is retrievable by reference of year, company shipped to and/or jobsite shipped to. Pursuant to Federal Rule 33(c), this defendant will permit plaintiff to review such records at a mutually convenient time, and at GAF's offices.

INTERROGATORY 31:

Has any officer, employee or representative of your company visited BSC? If so, state:

a. The name, address and title of each employee who visited the shipyards;

b. The date and purpose of the visit;

c. Who at the shipyards he saw and spoke to.

ANSWER TO INTERROGATORY 31:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not

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drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence. The only relevant visits to BSC could be those dealing with shipments of GAF's asbestos-containing thermal insulation products to jobsites at BSC on which and during years in which plaintiff actually worked.

INTERROGATORY 32:

Have you at any time since 1930 bought from or, sold, delivered or supplied to any other defendant in this action any "asbestos products"? If so, state for each such sale, and delivery or purchase:

a. The date such products were bought, supplied sold, and delivered;

i. The invoice number;

ii. The purchase order number;

b. The generic name of the "asbestos product";

c. The brand name of the "asbestos product";

d. The Trademark name of the "asbestos product";

e. The chemical composition of such "asbestos products";

f. The mineralogical constituents of such asbestos product and the percentage, by weight, of each constituent;

g. The quantity of each such purchase, sale and delivery;

h. The price paid by the buyer for the shipment;

i. The invoice and purchase order number of such shipment and any other information required to identify each such document;

j. If sold, delivered or supplied pursuant to a contract or "rebranding agreement" identify the agreement by title, date, signers and present location;

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k. The department and officer or employee who placed the order;

l. The department and officer or employee who accepted the order.

ANSWER TO INTERROGATORY 32:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, this defendant responds that it has not maintained a complete listing of its asbestos suppliers since it ceased production of the bulk of its asbestos-containing thermal insulation products. However, the following is a partial list of asbestos suppliers:

Vermont Asbestos Group	Carey Canadian Mines, Ltd.
Canadian Johns-Manville, Corporation	Asbestos Corporation
Lake Asbestos of Quebec, Ltd.	Bell Mines
	Cape Asbestos
	Union Carbide

INTERROGATORY 33:

With regard to each order of asbestos products referred to in Answer 32 state whether:

a. You provided other defendants with specification concerning the asbestos products sold;

b. The other defendants provided product specifications to you concerning the asbestos products it ordered from you;

c. You provided other defendants with any advertising, promotional material or technical information;

d. You provided any instructions concerning the proper use of the asbestos material;

e. You provided any warnings regarding the asbestos products you sold and/or delivered or received any regarding asbestos products purchased;

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f. You provided any warranties concerning the asbestos products;

g. You received any warranties concerning the asbestos products.

ANSWER TO INTERROGATORY 33:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence. The only orders of asbestos products that could be relevant are those where the products were delivered to jobsites on which and during years in which plaintiff actually worked. Subject to this objection, GAF responds that it does not recall any warnings, etc., which it might have received from its suppliers. This defendant provided the following warnings on its products:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

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CAUTION

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In approximately 1972, this warning was further changed to read as follows:

CAUTION

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INTERROGATORY 34:

Have you ever communicated with an agency or department of the United States, concerning the specifications and/or standard for any asbestos product or thermal insulation product? If so, state separately for each product or set of specifications:

a. Identify each such product;

b. The number, if any, assigned to the military or federal specification or standard;

c. The intended purpose or use for the products so specified;

d. The date, time and place of each communication:

1. The name of each of your agents or employees who participated in each communication:

2. The name, titlee, and agencies of each individual with whom such communication was had;

3. The subject of the communication;

4. Whether any notes, minutes or memoranda in any form were recorded of such communication or of any meetings between you and the agency?

5. Whether any documents were submitted to the agency;

6. If (4) and (5) is answered in the affirmative state the name, and location of the custodian of such records.

ANSWER TO INTERROGATORY 34:

No, not to the best of our knowledge.

INTERROGATORY 35:

Have you ever been a member of or participated in a trade association which communicated with any agency or a department of the United States, concerning specifications and/or standards for any asbestos product or thermal insulation product. If so, state separately for each product or set of specifications:

a. Identify each such product;

b. The number, if any, assigned to the military or federal specification or standard;

c. The name of the association;

d. The years during which you were a member of or participated in the association;

e. The intended purpose or use for the product so specified;

f. The date, time and place of each communication;

1. The name of each of your agents or employees and the association representative who participated in each communication;

2. The names, titles and agencies of each individual with whom such communication was had;

3. The subject of the communication;

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4. Whether any notes, minutes or memoranda in any form were recorded of such communication or of any meetings between you and the agency?

5. Whether any documents were submitted to the agency;

6. If (4) or (5) is answered in the affirmative state the name, and location of the custodian of such records;

g. The date, time and place of each trade association meeting at which such communications were discussed and the name and location of the custodian of the notes, minutes, or memoranda of such meetings.

ANSWER TO INTERROGATORY 35:

This defendant has no first hand knowledge or familiarity with the information requested in this interrogatory.

INTERROGATORY 36:

Were any of the products sold by you to private persons or companies (i.e. non-military or non-government contract sales) the same products you sold pursuant to military or federal specifications? If so please state:

a. Your name or designation for the product;

b. The applicable military or federal specification.

ANSWER TO INTERROGATORY 36:

This defendant's asbestos-containing thermal insulation products have not been manufactured according to any U.S. Government specifications, although certain of GAF's products might have matched relevant specifications.

INTERROGATORY 37:

If any part of Interrogatories 33, 34, 35 or 36 is answered in the affirmative, identify each pertinent document by:

a. Date;

b. Title and identification number;

c. Name of person who prepared it;

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d. Name of person who authorized its use;

e. Present location and custodian of the document.

ANSWER TO INTERROGATORY 37:

Not applicable.

INTERROGATORY 38:

If you performed any acts which altered the asbestos products between the time they came into your possession and the time they were delivered to any other defendant, describe:

a. The form the asbestos products were in when they first came into your possession;

b. What alteration you made to the asbestos products;

c. The reason for the alteration made by you before you shipped the asbestos product to any other defendant.

ANSWER TO INTERROGATORY 38:

This defendant objects to this interrogatory on the grounds that the term "altered" is vague and ambiguous.

INTERROGATORY 39:

Did you receive any warning, instructions, or information as to the dangers of asbestos inhalation when you purchased, or accepted any asbestos or asbestos products? If so, for each order state:

a. Describe in detail each such warning, instruction or information received;

b. State whether such warnings, instruction or information was oral or written;

c. If oral, identify the substance of the warning, instruction or information received and the date and the name and company of the person from whom received;

d. If written, attach a copy of each warning, instruction and information, identify it by date given, title and reference number and state the manner and location whereby it was transmitted to you.

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ANSWER TO INTERROGATORY 39:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, harassing and not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence. The only purchases of asbestos products that could be relevant are those where the products were delivered to jobsites on which and during years in which plaintiff actually worked. Subject to this objection, GAF responds that it does not recall any warnings, etc., which it might have received from its suppliers.

INTERROGATORY 40:

Have you ever provided a warning directly to workers at BSC concerning the danger of exposure to asbestos inhalation as a result of use of your asbestos products? If so:

a. State the date of each such direct warning;

b. Identify the name of your employee who provided the direct warning;

c. Identify the employee who determined to provide a warning;

d. If the warning was in writing, identify each document containing the warning and state the content of each warnings;

e. If the warning was oral, state the substance of the warning, where given and the names of the Key Highway Shipyard employees to whom it was given.

ANSWER TO INTERROGATORY 40:

This defendant provided the following warnings on its asbestos products:

In approximately 1965, Ruberoid Company began placing warning notices on packages of its thermal insulation products containing asbestos fiber:

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CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In 1970, this warning label was changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U. S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In approximately 1972, this warning was further changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID BREATHING DUST.

INTERROGATORY 41:

Has your company had, as part of its processing, distribution and sales of asbestos materials and products, a system of inspections? If so please state:

a. When the system was initiated;

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b. Who was responsible for initiating and overseeing the system;

c. Describe the system used;

d. If there are any documents describing the inspection system, identify each such document.

e. Identify all records of such inspections and the name and address of their custodian.

ANSWER TO INTERROGATORY 41:

This defendant objects to this interrogatory on the grounds that the term "system of inspections" is vague and ambiguous.

INTERROGATORY 42:

State whether any of your asbestos products were subject to a system of United States government source inspection ("GSI"). If so:

a. Identify all documents describing or establishing such a system of inspections;

b. Identify all records of such inspections.

ANSWER TO INTERROGATORY 42:

This defendant objects to this interrogatory on the grounds that it is not drafted in a fashion precise enough, nor reasonably calculated to lead to the discovery of admissible evidence. The only relevant documents or records of asbestos products subject to a system of GSI could be those which cover deliveries to jobsites on which and during years in which plaintiff actually worked.

INTERROGATORY 43:

Were the asbestos products listed in Answer (10), or made available to BSC or sold to any defendant, were the subject of any type of advertisement, regardless of media, issued in behalf of your company. If so, state for each product:

a. The subject matter of the advertisement;

b. The media in which the advertisement was placed;

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c. When the advertisement(s) was so placed;

d. The geographic area(s) the advertisement was used in;

e. Whether any photographs or diagrams were included in the copy of the advertisement;

f. Identify the advertisement by author, date, and present location and custodian, attach copies of all advertisements and state exactly where the advertisement was published, broadcast or made public;

g. Was anyone, besides you, involved in the preparation of the copy for the advertisement, and if so, state such other name and address.

ANSWER TO INTERROGATORY 43:

This defendant does not know the identities of persons involved in the preparation of such advertising materials, if any, prior to 1967. After 1967, such materials were prepared primarily by Ms. Helen Lofaro, Manager of Sales and Services for GAF's then Industrial Products Division. Some advertising for GAF's asbestos-containg thermal insulation products has been handled by Scali, McCabe, Sloves, 800 Third Avenue, New York, New York. Advertisements for GAF's (and The Ruberoid Company's) industrial thermal insulation products appeared in the magazine Asbestos.

INTERROGATORY 44:

Were any brochures, writings, or other materials, written or photographic, made available to distributors, ultimate users or the general public concerning the design, manufacture, distribution, selling, use, and/or quality and properties of the asbestos product referred to in your Answer (10) or made available to BSC directly or indirectly or sold to any defendant. If so, for each such brochure or other material:

a. State the purpose of the brochure and material;

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b. State when the material was accepted on behalf of the company for general distribution;

c. Give the name, present address, telephone number of the person responsible for the preparation and acceptance of the material for general distribution on behalf of the company;

d. Identify the brochure or material by author, date and present location and custodian, and attach copies of each.

e. Please attach a copy of the applicable aforementioned material to your answers.

ANSWER TO INTERROGATORY 44:

This defendant does not know the identities of persons involved in the preparation of such advertising materials, if any, prior to 1967. After 1967, such materials were prepared primarily by Ms. Helen Lofaro, Manager of Sales and Services for GAF's then Industrial Products Division. Some advertising for GAF's asbestos-containing thermal insulation products has been handled by Scali, McCabe, Sloves, 800 Third Avenue, New York, New York.

INTERROGATORY 45:

Have you stopped producing, distributing and/or selling any of the asbestos products listed in Answer (10) or which had been made available to BSC or which were sold to any other defendant. If so, state:

a. The reason you stopped;

b. When you stopped;

c. Who authorized or directed the stopping;

d. Whether any studies were conducted before you directed that production and sale be stopped and if so, identify each study by date, author, title and subject matter and attach a copy.

ANSWER TO INTERROGATORY 45:

Yes. This defendant discontinued the production of

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Calsilite in mid-1970 because it was unprofitable. GAF discontinued the manufacture of 115 and 214 Insulation Cements in September, 1975 because they were unprofitable. GAF discontinued the manufacture of T/NA-100 Insulation Jacketing in September, 1971 because it was unprofitable.

INTERROGATORY 46:

If your company manufactures or manufactured any insulating products which are commonly used by insulation workers and which contain or contained asbestos, please describe how the following are cut, shaped, mixed and applied on the jobs:

a. Asbestos cement mixes;

b. Asbestos pipe covering;

c. Asbestos bricks or blocks;

d. Asbestos sheeting;

e. Asbestos insulation used to protect against extremes of heat as well as cold;

f. Asbestos insulation in loose form which may be blown into homes or buildings;

g. Asbestos applied in spray form;

h. Asbestos tape, cloth or yarn;

i. Asbestos felt or blanket giving particular reference as to whether or not the materials have to be sawed or cut on the job, blown into confined areas, or mixed with water into a cement or paste.

ANSWER TO INTERROGATORY 46:

a. 115 and 214 Insulation Cements were mixed with water into a heavy paste consistency and then applied with a trowel.

b. Calsilite pipe covering required very little cutting. When it was necessary to cut on the job at the point of application, the applicator could use either a hand or power saw for that operation.

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c. Calsilite block required very little cutting. When it was necessary to cut on the job at the point of application, the applicator could use either a hand or power saw for that operation.

d. Millboard is generally cut by mechanical knife or die-cut on a punch press.

e. Not applicable.

f. Not applicable.

g. Not applicable.

h. Not applicable.

i. Not applicable.

INTERROGATORY 47:

When did you first learn that there were health hazards associated with the use and/or fabrication of asbestos containing products; state the date, source, nature and extent of such information.

ANSWER TO INTERROGATORY 47:

In approximately 1964, GAF became aware of opinions expressed by some members of the medical profession such as Dr. Irving Selikoff that asbestosis could occur among insulation workers, although the opinion did not relate specifically to the use of our products.

INTERROGATORY 48:

Do you agree that:

a. Asbestos inhalation causes asbestosis;

b. Asbestos inhalation causes mesothelioma;

c. Asbestos inhalation causes lung cancer;

d. Asbestos inhalation causes bronchogenic cancer;

e. Asbestos inhalation causes laryngeal cancer;

f. Asbestos inhalation causes esophygeal cancer;

g. Asbestos inhalation causes gastro-intestinal cancer;

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h. Asbestos inhalation causes colon cancer;

i. Asbestos inhalation causes kidney cancer;

j. Asbestos inhalation causes prostate cancer;

k. There is an established statistical correlation between persons' working with asbestos and contracting:

i. Mesothelioma;

ii. Lung cancer;

iii. Bronchogenic cancer;

iv. Laryngeal cancer;

v. Esophygeal cancer;

vi. Gastro-intestinal cancer;

vii. Colon cancer;

viii. Kidney cancer;

ix. Prostate cancer;

l. That a portion of the inhaled asbestos fibers present in the lung after being inhaled in the human body are not eventually expelled;

m. The diseases caused by asbestos inhalation usually have a long latency period and may not manifest themselves until many years after the initial inhalation of asbestos;

n. Prolonged exposure to asbestos materials listed in Answer 10 can cause or contribute to various occupational diseases such as asbestosis, cancer and mesothelioma;

o. That the use of asbestos insulating products listed in Answer 10 are dangerous and harmful to human health;

p. The possibility of developing asbestos-related disease extends not only to workers handling asbestos the products but also to others in the area where the products are used;

q. The possibility of developing asbestos-related disease extends not only to workers handling asbestos the

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products but also to members of families of such workers.

ANSWER TO INTERROGATORY 48:

This defendant objects to all subsections of this interrogatory on the grounds that it seeks medical opinion. Subject to this objection, this defendant recognizes that there are medical theories that such associations exist, and became aware of such theories as follows:

a. GAF Corporation became aware of medical theories which related asbestos exposure to asbestosis in the middle 1960's;

b. GAF Corporation became aware of medical theories which related asbestos exposure to mesothelioma only during the course of asbestos litigation;

c. GAF Corporation became aware of medical theories which related asbestos exposure to lung cancer in the middle 1960's;

d.-k. GAF Corporation became aware of medical theories which related asbestos exposure to other cancers only during the course of asbestos litigation.

INTERROGATORY 49:

If any part of Question 48 is answered in the affirmative state for each such affirmative answer:

a. When your company reached such conclusion;

b. What information you relied upon in reaching that conclusion;

c. What if anything you did to notify the public of the conclusion you reached;

d. What if any you did to notify the users of your product of the conclusion.

ANSWER TO INTERROGATORY 49:

This defendant objects to this interrogatory on the ground that it assumes an answer to Interrogatory No. 48, which seeks

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a medical opinion. Subject to this objection, this defendant recognizes that there are medical theories that such associations exist, and became aware of such theories as follows:

a. GAF Corporation became aware of medical theories which related asbestos exposure to asbestosis in the middle 1960's;

b. GAF Corporation became aware of medical theories which related asbestos exposure to mesothelioma only during the course of asbestos litigation;

c. GAF Corporation became aware of medical theories which related asbestos exposure to lung cancer in the middle 1960's;

d.-k. GAF Corporation became aware of medical theories which related asbestos exposure to other cancers only during the course of asbestos litigation.

INTERROGATORY 50:

Had you knowledge of any deaths or cases of lung disease or lung impairment among your employees which are or may be attributable to the inhalation of asbestos dust or fibers. If so, please give the number, the name and address of such employees, together with the dates of treatment to such persons and reports of occupational disease furnished to the Industrial Commission of the relevant states and attach copies of the latter.

ANSWER TO INTERROGATORY 50:

This defendant objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

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INTERROGATORY 51:

Have you ever, as a part of your business, had a division or unit which installed insulation materials on a contract by contract basis. (hereinafter "contract units"). If so state:

a. Where each contract unit was based;

b. The name of the managers of each contract unit since 1930;

c. Whether rules, regulations and/or work practices existed which were to be followed by employees in each such contract unit;

d. Were employees in these contract units ever required to wear respirators. If so please state:

i. whether the requirement was by written regulation or oral direction;

ii. the names of the people in your firm originating such a requirement and/or incharge of enforcing it;

iii. the date the requirement was imposed for the first time;

e. Have former employees of your contract units ever filed workmen's compensation claims due to lung or coronary illness. If so, for each such claim, state:

i. the date, jursidiction and docket number;

ii. the illness or disease claimed;

iii. the resolution of the claim;

iv. the names of the co-respondents.

ANSWER TO INTERROGATORY 51:

No.

INTERROGATORY 52:

Have you ever employed any steam plant operators or boiler repair workers. If so, state:

a. Whether rules, regulations and/or work practices existed which were to be followed by such employees;

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b. Were such employees ever required to wear respirators. If so, please state:

i. whether the requirement was by written regulation or oral direction;

ii. the names of the people in your firm originating such a requirement and/or incharge of enforcing it;

iii. the date the requirement was imposed for the first time;

c. Have such former employees ever filed workmen's compensation claims due to lung or coronary illness. If so, for each such claim, state:

i. the date, jurisdiction and docket number;

ii. the resolution of the claim;

iii. the names of the co-respondents.

ANSWER TO INTERROGATORY 52:

No.

INTERROGATORY 53:

Have you ever prepared statistical analysis showing the number of your employees who have been exposed to asbestos dust and fibers for more than ten years who have asbestos-related cancer, lung disease or lung impairment? If so, identify the date and its present location, and provide the figures.

ANSWER TO INTERROGATORY 53:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 54:

Have you ever considered preparing a statistical analysis of the type referred to in Interrogatory 56. If so, for each occasion when such consideration was given, state:

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a. The form of the consideration;

b. The date of the consideration;

c. The action taken;

d. If the consideration occurred at a meeting, the names and present business and home addresses of those attending;

e. The location of any records of such considerations.

ANSWER TO INTERROGATORY 54:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 55:

List all the companies which have provided you Workmen's Compensation insurance and accident and disability insurance since 1930 and the dates each company provided such coverage.

ANSWER TO INTERROGATORY 55:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 56:

Have any workman's compensation claims based on asbestosis, lung cancer, mesothelioma, asbestos-induced diseases, or lung diseases been filed against you? If so, for each claim state:

a. The date filed;

b. When and where the claims were filed;

c. The reference numbers of all claims filed;

d. The outcome of the claims;

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e. The location and custodian of all such compensation records.

ANSWER TO INTERROGATORY 56:

This defendant objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 57:

When did you learn for the first time of a diagnosed case of asbestosis, lung cancer, mesothelioma, or gastro-intestinal cancer associated with asbestos exposure;

a. Among your own present or former employees;

b. Involving users of asbestos insulation products;

c. Involving users of asbestos products manufactured, sold or distributed by you;

d. Involving members of families of workers using your product;

e. Involving members of the families of your employees or former employees;

ANSWER TO INTERROGATORY 57:

This defendant objects to this interrogatory on the ground that it seeks information which is a matter of public record and therefore, equally available to plaintiff. Subject to this objection, GAF responds that the first asbestos-related lawsuit naming GAF as a defendant was Totter v. Fibreboard, et al., (USDC E.D. Texas; CV 7329; filed July 29, 1969).

INTERROGATORY 58:

Have you ever conducted or financed any inspection, or made any dust count of areas at BSC or at other facilities where workers used asbestos products manufactured by your company?

a. If you have not, explain why this was not done;

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b. If you have, what action, if any, did your company take following the inspection or the taking of such dust counts, the dates and places, if any, where your company first started making such dust counts, the dates and places this has been done since, and the results of such tests;

c. Identify each report of a test identified in (b);

d. Whether or not you have conducted such studies, state whether you ever considered doing so and for each occasion when such consideration was given, state:

i. the form of the consideration;

ii. the date of the consideration;

iii. the result of the consideration;

iv. if the consideration occurred at a meeting, the names and present business and home addresses of those attending;

v. the location of any records of such considerations.

ANSWER TO INTERROGATORY 58:

No, not to the best of our knowledge. GAF Corporation did not believe that it had a legal duty or responsibility to perform dust monitoring tests at jobsites.

INTERROGATORY 59:

Have you ever conducted or financed any studies of the dust levels of asbestos produced when your asbestos products were used, installed or removed from a prior installation?

a. If you have not, explain why this was not done;

b. If you have, what action, if any, did your company take following the inspection or the taking of such dust counts, the dates and places, if any, where your company first started making such dust counts, the dates and places this has been done since, and the results of such tests;

c. Identify each report of a test identified in (b);

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d. Whether or not you have conducted such studies, state whether you ever considered doing so and for each occasion when such consideration was given, state:

i. the date of the consideration;

ii. the form of the consideration;

iii. the result of the consideration;

iv. if the consideration occurred at a meeting, the names and present business and home addresses of those attending;

v. the location of any records of such considerations.

ANSWER TO INTERROGATORY 59:

No, not to the best of our knowledge. GAF Corporation did not believe that it had a legal duty or responsibility to perform dust monitoring tests at job sites.

INTERROGATORY 60:

Have you ever conducted, or had conducted dust level monitoring in your own plants? If so:

a. When and where did you first begin such monitoring;

b. The name of all firms or persons who did such monitoring;

c. The date of all such monitoring;

d. The identity and location of all such monitoring records.

ANSWER TO INTERROGATORY 60:

This defendant objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff. Subject to this objection, GAF responds that it does conduct dust samplings in

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its own plants. The method for air sampling for asbestos until recently was by use of a midget impinger, and samples obtained were counted in the sampling liquid using a 1mm. deep counting cell and counting the settled particles with a microscope equipped with a 16mm. 10x objective. The current method approved by NIOSH utilizes the membrane filter method of 400x - 450x (magnification) (4mm. objective) with phase contract illumination.

INTERROGATORY 61:

State whether you ever considered monitoring dust levels and for each such occasion when such consideration was given, state:

a. The form of the consideration;

b. The date of the consideration;

c. If the consideration occurred at a meeting, the names and present business and home addresses of those attending;

d. The location of any records of such considerations.

ANSWER TO INTERROGATORY 61:

This defendant objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff. Subject to this objection, GAF responds that it does conduct dust samplings in its own plants. The method for air sampling for asbestos until recently was by use of a midget impinger, and samples obtained were counted in the sampling liquid using a 1mm. deep counting cell and counting the settled particles with a microscope equipped with a 16mm. 10x objective. The current method approved by NIOSH utilizes the membrane filter method of 400x -

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450x (magnification) (4mm. objective) with phase contract illumination.

INTERROGATORY 62:

Was the monitoring of dust levels required by any directive, regulation or rule of any government agency or insurance company? If so, identify the directive, regulation or rule, the agency promulgating it and the date it was promulgated.

ANSWER TO INTERROGATORY 62:

This defendant objects to this interrogatory on the ground that it seeks information which is equally available to plaintiff.

INTERROGATORY 63:

If Interrogatory 58 or 59 and/or 60 are answered in the affirmative please state, for each dust measurement or set of measurements please state:

a. Whether a log book was kept of the samples taken;

b. The location, custodian and identifying information for each report or analysis of the measurements;

c. The location, custodian and identifying information for the raw data of the measurements;

d. The persons responsible for supervising such measurements and their present addresses, if known.

ANSWER TO INTERROGATORY 63:

This defendant objects to this interrogatory on the grounds that it is unduly burdensome and not calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 64:

What technique(s), do you use or have you used to make dust level measurements, explaining the technique, when it was

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commenced, what the purpose was and what action had been taken in response to the findings as to the dust samples.

ANSWER TO INTERROGATORY 64:

This defendant objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff. Subject to this objection, GAF responds that it does conduct dust samplings in its own plants. The method for air sampling for asbestos until recently was by use of a midget impinger, and samples obtained were counted in the sampling liquid using a 1mm. deep counting cell and counting the settled particles with a microscope equipped with a 16mm. 10x objective. The current method approved by NIOSH utilizes the membrane filter method of 400x - 450x (magnification) (4mm. objective) with phase contract illumination.

INTERROGATORY 65:

State whether from 1930 to date you promulgated any rules, written or oral, for the handling of asbestos products by your own employees? If so, state:

a. When each such rules were promulgated;

b. The substance of the rules, if oral, and the name, address and title of the person who disseminated them;

c. If in writing, either attach a copy of the rules or identify the written rules by date, title, identification number, present location and the name and address of the custodian thereof;

d. Whether any such material was provided to BSC or to any defendant and, if so, when and to whom.

ANSWER TO INTERROGATORY 65:

This defendant objects to this interrogatory on the grounds

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that it is harassing and not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 65:

Have any of your employees ever been reassigned to other duties because of pulmonary or coronary health problems? If so, please state for each such employee reassignment:

a. The age of the employee at the time of reassignment;

b. The date of the reassignment;

c. The job prior to reassignment;

d. The job after reassignment;

e. The reason for such reassignment;

f. The associated health problem;

g. The doctor who recommended the reassignment.

ANSWER TO INTERROGATORY 66:

This defendant objects to this interrogatory on the grounds that it is harassing and not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 67:

State the names and addresses of all professional, trade, industrial and safety, hygiene, or health associations and research foundations or organizations you have been a member of since 1930 indicating:

a. The inclusive dates of your membership;

b. The names of each of your employees who attended meetings and the dates and designations of such meetings.

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ANSWER TO INTERROGATORY 67:

Asbestos Information Association/North American
Suite 914
1660 L Street N.W.
Washington, D.C. 20036

National Insulation Manufacturers' Association, Inc.
441 Lexington Avenue
New York, New York 10017

Asbestos Cement Product Association

American Society of Testing Materials
Race Street
Philadelphia, Pennsylvania

National Crushed Stone Association

Canadian Institute of Mining and Metallurgy

National Insulating Contractors Association

The following employees attended meetings of the above associations, foundations or organizations:

Asbestos Information Association/North America - Joseph Hall, William Fassuliotis, Jim Cloney, Tom Dent, Power Fraser, and Harry Mesler (deceased).

National Insulation Manufacturers Association, Inc. - Dick Henry and William Schwingen. In addition, from NIMA minutes supplied to the defendant by Plaintiffs' counsel in other asbestos litigation, it appears that H.B. Hutton, W.G. Neal and H. Johnston attended NIMA although GAF has no independent knowledge of their attendance at NIMA meetings.

Asbestos Cement Product Association - Phillip Bettoli.

American Society of Testing Materials - William Schwingen.

National Crushed Stone Association - Wayne Page.

Canadian Institute of Mining and Metallurgy - Wayne Page.

National Insulating Contractors Association - Dick Henry.

INTERROGATORY 68:

State the names and addresses of any organizations to which you have belonged since 1930 having anything to do with the setting of standards, regulations, information, lobbying,

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research, engineering, or use of asbestos products, materials, or fibers. For each organization please state:

a. The inclusive dates of your membership;

b. The names of your employees who attended meetings and the dates and designations of such meetings.

ANSWER TO INTERROGATORY 68:

Asbestos Information Association/North American
Suite 914
1660 L Street N.W.
Washington, D.C. 20036

National Insulation Manufacturers' Association, Inc.
441 Lexington Avenue
New York, New York 10017

Asbestos Cement Product Association

American Society of Testing Materials
Race Street
Philadelphia, Pennsylvania

National Crushed Stone Association

Canadian Institute of Mining and Metallurgy

National Insulating Contractors Association.

INTERROGATORY 69:

Do you maintain a library dealing with industrial hygiene, medicine, safety and/or engineering? If so, state:

a. The date you established the library;

b. The location of the library;

c. The name of names of the librarian(s) since 1930;

d. All journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety and/or engineering;

e. All books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER TO INTERROGATORY 69:

No.

INTERROGATORY 70:

Have you at any time since 1930, maintained any office or department dealing with medical research? If so, state:

a. The name of such department;

b. The location of such department;

c. The name, address and title of each person who has been in charge of the department.

ANSWER TO INTERROGATORY 70:

No.

INTERROGATORY 71:

Have you ever hired a "medical director"? If so, please state:

a. The date first hired;

b. His or her name and dates of employment;

c. The reason for hiring such a medical director;

d. The location where the medical director was assigned;

ANSWER TO INTERROGATORY 71:

No.

INTERROGATORY 72:

State for any physician or biological scientist ever employed by your firm as a consultant, plant physician or otherwise:

a. His or her name and address;

b. The dates of employment;

c. The duties and responsibilities of each;

d. The location, identifying titles or codes, and custodians of all reports or memoranda written by each;

e. The professional specialization of each;

f. The reason for hiring each such person;

g. The name and address of the person in your firm responsible for hiring such person.

ANSWER TO INTERROGATORY 72:

From time to time during the period beginning in approximately 1930, GAF called upon local physicians from

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surrounding cities or towns near its plant locations to perform routine physical examinations and to administer routine medical treatment when and if necessary. There are no records presently within the possession, custody or control of GAF which reflects the names of these physicians or the professional services performed by them. However, in the course of deposition given by Wayne Page in Van Buskirk, et al v. Carey Canadian Mines, Ltd., et al., U.S.D.C., E.D. Pa., Civil Action No. 78-4242; All Philadelphia Naval Shipyard cases before Judge Takiff; Asbestos Cases, U.S.D.C., E.D. Va. on November 27, 1979, one such local physician was recollected by the deponent at p. 84 of said deposition.

INTERROGATORY 73:

Have you ever employed an "industrial hygienist" or employed one as a consultant? Please state for each hygienist:

a. The reasons for hiring such a hygienist;

b. The location where the hygienist was assigned;

c. The duties of the hygienist;

d. The names and addresses of the persons hiring such hygienist and of the hygienist;

e. The date when such hygienist was first hired.

ANSWER TO INTERROGATORY 73:

No.

INTERROGATORY 74:

Prior to 1972, were your employees ever subject to periodic medical examinations? If so, please state:

a. Whether the examinations were performed by your firm, its agents or employees or by outside personnel either private or governmental;

b. Whether the examinations were performed as a result of an internal corporate decision or to comply with some governmental rule;

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c. Whether any person was rejected for employment as the result of such examination. If so, state the date and reason for such rejection;

d. Whether any employee was reassigned, terminated or pensioned as the result of such examination and the date and reason for each such occurrence;

e. Your policy concerning advising the employees examined of the results of the examination

ANSWER TO INTERROGATORY 74:

To the best of this defendant's knowledge, the only medical examination programs offered/sponsored by GAF Corporation have been those examination programs required by OSHA, in the manner specified by the OSHA regulations.

INTERROGATORY 75:

Have environmental conditions in the workplace ever been subject of negotiations between your firm and any organization representing your employees? If so, state:

a. The date of each negotiation;

b. The employee organization and the names of the negotiators;

c. The firm operation in question;

d. The negotiators for your firm;

e. The condition at issue and the proposed contract clause.

ANSWER TO INTERROGATORY 75:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 76:

Have environmental conditions in the workplace ever been

the subject of a clause in a collective bargaining agreement (CBA) to which you have been a party. If so, state for each such CBA:

a. The division, subsidiary, plant or operation covered by each such CBA;

b. The effective dates of each such CBA;

c. The employee organizations which were parties to such a CBA;

d. The specific clauses in the CBA covering environmental conditions.

ANSWER TO INTERROGATORY 76:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 77:

Have any grievances ever been filed by any of your employees, complaining of or related to dusty conditions? If so, please state and for each such grievance:

a. The document identification for all documents relating to such a grievance;

b. The date filed;

c. The response;

d. Whether or not each such grievance reached arbitration and if so, whether the arbitrator filed a decision.

ANSWER TO INTERROGATORY 77:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

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INTERROGATORY 78:

Has your firm ever been cited or admonished by any government agency (federal, state or local) for dust levels in excess of any threshold limit value (TLV) or other pre-determined number? If so, please state:

a. The dust and TLV or number involved;

b. The date;

c. The government agency;

d. The means of identifying any document related to such an occurrance;

e. Any action taken by the agency involved.

ANSWER TO INTERROGATORY 78:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 79:

Since 1935 has there ever been an employee Health and Safety Committee at any of your firm's locations? If so, please state for each such committee:

a. The location involved;

b. The employee organization;

c. The name and address of all chairpersons.

ANSWER TO INTERROGATORY 79:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. It seeks information which is not relevant to the subject matter because GAF has not employed persons in the same capacity as plaintiff.

INTERROGATORY 80:

Have you contributed any funds to research concerning

asbestos and its relation to lung, heart, gastro-intestinal and/or larynx disease? If so, please state for each year the amount of money contributed, when and to whom it was contributed, attaching any report or reports from each individual or organization to whom your funds were distributed.

ANSWER TO INTERROGATORY 80:

No, not directly.

INTERROGATORY 81:

Have you conducted, had conducted for you, participated in, cooperated with, or funded any investigation, study, test, review or analysis (hereinafter referred to as "study") concerning asbestos-related diseases, asbestosis, pulmonary diseases or cancer. If so, identify each such study by:

a. The date each study was conducted;

b. The person authorizing the study;

c. The person in charge of the study;

d. The people participating in the study;

e. The title and subject of the study;

f. The results of each study;

g. If statistical analyses were made, state the results, describe the data and assumptions upon which the results were based;

h. If in writing, either attach a copy of the study or identify it by date, title, identification number, present location and custodian.

ANSWER TO INTERROGATORY 81:

No.

INTERROGATORY 82:

Have you conducted, participated, financed or had conducted for you any tests, studies, investigations or analyses (hereinafter referred to collectively as "studies") to

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determine the effects of your product on workers working with any of your asbestos products? If so, state for each study:

a. The subject matter, title and date of each study;

b. The date and name of the person authorizing the study;

c. The reason for the study;

d. The names of the persons who conducted the study;

e. The date the study was completed;

f. Whether the results were published and disseminated, and if so, where and to whom;

g. The results of each study;

h. If statistical analyses were made, state the results and describe the data and assumptions upon which the results were based;

i. If in writing, identify it by date, title, identification number, present location and custodian and attach a copy.

ANSWER TO INTERROGATORY 82:

No.

INTERROGATORY 83:

Have you conducted, participated, financed or had conducted for you any tests, studies, investigations or analyses (hereinafter referred to collectively as "studies") to determine the effects of inhalation of asbestos dust or fibers by any one using or being exposed to asbestos products manufactured by your company? If so, state for each study:

a. The subject matter, title and date of each study;

b. The date and name of the person authorizing the study;

c. The reason for the study;

d. The names of the person who conducted the study;

e. The date the study was completed;

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f. Whether the results were published and disseminated, and if so, where and to whom;

g. The results of each study;

h. If statistical analyses were made, state the results and describe the date and assumption upon which they were based;

i. If in writing, identify it by date, title, identification number, present location and custodian and attach a copy.

ANSWER TO INTERROGATORY 83:

No.

INTERROGATORY 84:

Have you conducted, participated, financed or had conducted for you any tests, studies, investigations or analyses (hereinafter referred to collectively as "studies") which had the purpose to prevent, minimize, or eliminate inhalation of asbestost dust and fibers by those using or exposed to your asbestos products? If so, state for each study:

a. The subject matter, title and date of each study;

b. The date and name of the person authorizing the study;

c. The reason for study;

d. The names of the person who conducted the study;

e. The date the study was completed;

f. Whether the results were published and disseminated, and if so, where and to whom;

g. The results of each study;

h. If statistical analyses were made, state the results describe the data and assumptions upon which the results were based;

i. If in writing, identify it by date, title, identification number, present location and custodian and

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attach a copy.

ANSWER TO INTERROGATORY 84:

No.

INTERROGATORY 85:

State whether you considered or took any action as a result of any of the studies listed in Answers to Interrogatories 84 through 88. If so:

a. Describe what factors you considered;

b. Describe the action taken;

c. Identify who authorized or directed the action;

d. When was the action taken;

e. Why was the action taken;

f. Identify all documents discussing the study, the action considered and the action taken by date, title, subject, author and present custodian and location and produce the documents;

g. If you have not taken any action state in detail, why not;

h. If you have not given any consideration to taking such actions, state in detail the reasons why.

ANSWER TO INTERROGATORY 85:

Not applicable.

INTERROGATORY 86:

Even if you did not contribute, participate in or cause to be conducted the studies mentioned in Interrogatories 80 through 84, state whether you ever discussed or considered doing so. If so, for each discussion or consideration please state the following:

a. The form of the discussion or consideration;

b. The date of the discussion or consideration;

c. If the discussion or consideration occurred at a meeting, the names and present business and home addresses of

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those attending;

d. The location and identifying codes of any records of such considerations.

ANSWER TO INTERROGATORY 86:

This defendant is not in possession of any documents which would provide the information requested in this interrogatory.

INTERROGATORY 87:

Have you, at any time, used the services of an industrial health consulting or research organization? If so, state:

a. The name of the organization;

b. The dates such services were used;

c. The name of the persons in your company and in the health organization who negotiated the agreement or understanding;

d. Whether any reports or documents concerning the services were prepared and, if so, identify the documents by name, date, title, file number and present location.

ANSWER TO INTERROGATORY 87:

No.

INTERROGATORY 88:

Did you in any way assist or participate in (a) any of Metropolitan Life Insurance Company's studies of asbestos conducted from 1929-1940, (b) any Trudeau Foundation/Saranac Lake studies from 1929-1960, (c) any Industrial Hygiene Foundation studies from 1938 to 1968; If so for each:

a. State what role or action you took;

b. Identify all documents relevant to such activities by name, date, title, file number and present location.

ANSWER TO INTERROGATORY 88:

No.

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INTERROGATORY 89:

Do you claim any respirators or other breathing devices would prevent inhalation of 100% of the asbestos dust and fibers given off or released from your product? If so, state:

a. Identify the respirator by manufacturer of product name and number;

b. When the respirator was sold;

c. Give the detailed description of such respirator or other breathing device;

d. The basis of your claim that it will prevent the inhalation of such dust and fibers;

e. Identify any relevant tests performed by date, title, author and number.

ANSWER TO INTERROGATORY 89:

This defendant objects to this interrogatory on the grounds that it seeks an expert opinion. Subject to this objection, this defendant is aware that there are and have been respirators or other breathing devices that allegedly prevent the inhalation of asbestos dust and fibers.

INTERROGATORY 90:

Have you undertaken or financed any studies to determine what type of respirator and/or protective mask would either eliminate or afford maximum protection against the inhalation of asbestos fibers? If so, state:

a. Who made the study;

b. When was the study made;

c. What was the result of the study;

d. If the result was written, identify the document by title, date, file designation and author of each such study, and the location and present custodian thereof.

ANSWER TO INTERROGATORY 90:

No.

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INTERROGATORY 91:

Have you undertaken or financed any tests or studies to determine what type of ventilator or ventilating system would eliminate or decrease the number of airborne asbestos fibers in confined spaces? If so, state:

a. Who made the test or study;

b. When was the test or study made;

c. What was the result of the study or test;

d. If the result was written, identify the document by title, date, file designation and author of each such test or study, and the location and present custodian thereof.

ANSWER TO INTERROGATORY 91:

No.

INTERROGATORY 92:

If any of your present or former employees or officers have testified at trial, by deposition in any litigation or before any Congressional Committee or administrative agency concerning asbestos exposure, pulmonary or asbestos-related diseases or industrial hygiene relating to asbestos use, state:

a. The name, address and title of each person who testified;

b. The date, action, location and forum of such testimony;

c. Whether defendant has a copy of such testimony;

d. Whether defendant will voluntarily produce a copy of such testimony.

ANSWER TO INTERROGATORY 92:

The following GAF corporate personnel were deposed in William J. Baumgardner v. Combustion Engineering, Inc., et al., U.S.D.C., S.C., Civil Action No. 77-995:

Phillip Bettoli - (retired) - Technical Director - Research Department - GAF Corporation - South Bound Brook, New Jersey 08880

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William Schwingen - Products Manager - Insulation -
GAF Corporation - 140 West 51st Street -
New York, New York 10020

Wayne Page
GAF Corporation
40 West 51st Street
New York, New York 10020

William Fassuliotis, Director of Safety and Occupational Health, GAF Corporation, Wayne, New Jersey 07470, was deposed on November 27, 1979 in Van Buskirk, et al. v. Johns-Manville Corp., et al., All Philadelphia Naval Shipyard Cases before Judge Takiff; Asbestos Cases, U.S.D.C., E.D. Va.; and on December 14, 1979 in Forest, et al. v. Johns-Manville Corp., et al., U.S.D.C., E.D. Mo., Cause 78-1346C(3).

Joseph Hall, GAF Corporation, 140 West 51st Street, New York, New York 10020 was deposed on December 20, 1978 in Grugan v. Johns-Manville Corp., et al., C.C.P., Philadelphia County, January Term, 1977, No. 2052(1), Asbestos Case No. 89(1); and on December 14, 1979 in Forest, et al. v. Johns-Manville Sales Corp., et al, U.S.D.C., E.D. Mo. Cause No. 78-1346C(3).

Phillip Bettoli, (retired), Technical Director, Research Department, GAF Corporation, South Bound Brook, New Jersey 08880, was deposed on January 28, 1978 in Ballinger v. Combustion Engineering, Inc., et al., C.C. Knox Co., Tenn., No. 1-684-75; Stanrrs v. Combustion Engineering, Inc., et al., U.S.D.C., E.D. Tenn., No. 2-75-122; and on March 8, 1978 in Coordinated Proceeding, U.S.D.C., E.D. Vir., Civil Action No. CT-77-1.

Joseph Hall, GAF Corporation, 140 West 51st Street, New York, New York 10020 testified at OSHA public hearings in Washington, D.C. on March 16, 1972.

INTERROGATORY 93:

For every policy of liability insurance insuring you against losses as a result of claims for bodily injury or death

as a result of use of your asbestos products from 1935 to the present list:

a. The name of each insurer;

b. Each policy number;

c. The term of each policy;

d. The amount of the coverage;

e. Whether each policy provides for primary or excess coverage and if excess, the limits;

f. The deductible, if any, for each policy;

g. The basis of coverage for each - e.g. claims made, occurrence;

h. The amount paid by the insurer to date or alternatively the amount of coverage still remaining;

i. The identity of the person having possession of each policy.

ANSWER TO INTERROGATORY 93:

This defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, a schedule containing part of the information requested is attached which demonstrates the burdensome quality of interrogatory.

INTERROGATORY 94:

Describe in detail your corporate history from 1930, including any mergers, acquisitions or spin-offs having to do with the manufacture or sale of asbestos products. If you have sold any asbestos-product line or stock in a company dealing with asbestos-products, state the date of the sale and identify the purchaser.

a. Identify every document related to each stage in the history or transaction set forth above.

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ANSWER TO INTERROGATORY 94:

GAF Corporation was incorporated in Delaware in 1929 as American I.G. Corporation. Its name was changed in 1939 to General Aniline and Film Corporation, and again in 1968 to GAF Corporation. GAF maintains its principal place of business at 140 West 51st Street, New York, New York 10020. On May 26, 1967 GAF merged with The Ruberoid Company, assuming its assets and liabilities. The Ruberoid Company was originally incorporated in New York in 1886 as The Standard Paint Company. This company was succeeded by a company of the same name, which was incorporated in West Virginia in 1889; and that company was in turn succeeded by The Standard Paint Company, incorporated in in New Jersey on June 16, 1905. The name of the company was changed to The Ruberoid Company on March 10, 1921. GAF is qualified to do business in Maryland.

INTERROGATORY 95:

If your company was formed after 1930, describe in detail the circumstances under which it was formed including the sources of the knowledge or equipment to be used to manufacture asbestos products, the source of the rights to manufacture asbestos products, the company's incorporators, first Board of Directors and officers and their occupational history prior to your company's formation.

a. Identify every document related to the description set forth above.

ANSWER TO INTERROGATORY 95:

Not applicable.

INTERROGATORY 96:

Have you ever included a health warning with respect to any product manufactured by you which does not contain asbestos, indicating that such non-asbestos containing product may in

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some way be harmful to human beings? If so, for each such product, please state:

a. The name of the product;

b. The chemical composition or ingredients of the product;

c. The use for which such product is intended;

d. The manner in which it is thought the product may cause harm to human beings;

e. The contents of the warning;

f. The size of the warning;

g. The color of the warning;

h. The date the warning was first given to the public;

i. The names of the people responsible for or participating in the decision to provide the warning and:

i. their present address;

ii. their present position or status with your company;

iii. the position held at the time the decision was made.

j. Please identify every document which relates to the making of the decision to provide a warning.

ANSWER TO INTERROGATORY 96:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. The only relevant health warnings could be those on asbestos products shipped to jobsites on which and during the years in which plaintiff worked.

INTERROGATORY 97:

Does your company have a record or document retention or destruction policy, plan or program? If so, please describe such plan in detail. If the plan is different for separate

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categories of records, please describe the plan for each category. Please include in the description the following:

a. The name and title of the custodian of the records;

b. The length of time for which records are retained;

c. The titles and names of the personnel responsible for determining the policy or plan from 1935 to the present;

d. The titles and names of the personnel responsible for the removal and destruction of any records, pursuant to any such plans from 1935 to the present.

ANSWER TO INTERROGATORY 97:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as it seeks information which is not relevant to the matter at hand. Subject to this objection, GAF responds that its general policy is to retain records for seven years.

INTERROGATORY 98:

Pursuant to your record destruction or retention policy have you destroyed any documents, records or writings pertaining to:

a. Health hazards of asbestos;

b. Workmen's Compensation claims arising out of asbestosis, lung cancer, mesothelioma, cor pulmonale, pneumoconiosis, or pulmonary fibrosis;

c. placing warning labels on your products;

d. Hazardous conditions in your plants or factories;

e. Funding or studies about health hazards of asbestos;

f. Lawsuits arising out of injuries alleged to have been caused by asbestos.

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ANSWER TO INTERROGATORY 98:

This defendant objects to this interrogatory on the grounds that it is unduly burdensome and not calculated to lead to the discovery of admissible evidence, inasmuch as it seeks information which is not relevant to the subject matter. Any documents relevant to any of these answers to interrogatories are attached or are maintained by GAF at its principal place of business.

INTERROGATORY 99:

If your answer to Interrogtory 98 is affirmative, list every such document destroyed by author, date and subject matter.

ANSWER TO INTERROGATORY 99:

Not applicable.

INTERROGATORY 100:

Were the products listed in the answer to Interrogatory (10), or supplied directly or indirectly to BSC, manufactured in accordance with company product specifications (whether or not they also were produced in accordance with specifications of any outside organization)? If so, please state the following:

a. The identity or designation of each of the specifications;

b. The present location of the specification;

c. The date of the specifications and any amendments or changes thereto;

d. The names and titles of the persons preparing each specification and any amendments thereto;

e. The names and titles of the persons approving each specification and any amendments thereto.

ANSWER TO INTERROGATORY 100:

With regard to the product specifications, calsilite block

and pipe covering contained approximately 10% amosite, 2% chrysotile, and calcium hydrosilicate and diatamaceous earth.

INTERROGATORY 101:

Please identify each distributor, or wholesaler of your asbestos-containing or thermal insulation products since 1930 in Maryland, Delaware, the District of Columbia and in Virginia within a 100 mile radius of Washington, D.C. For each distributor, or wholesaler, please state:

a. The last known address;

b. The years of the relationship;

c. Whether there was a written distributorship agreement;

d. Whether the distributorship was exclusive.

ANSWER TO INTERROGATORY 101:

This defendant objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. The only relevant shipments of GAF's asbestos-containing thermal insulation products could be those made to jobsites on which and during years in which plaintiff actually worked. Subject to this objection, GAF responds that it maintains at its New York, New York; Gloucester, New Jersey; and South Bound Brook, New Jersey offices, certain shipping records of asbestos-containing thermal insulation products. The information contained therein is retrievable by reference of year, company shipped to and/or jobsite shipped to. Pursuant to Federal Rule 33(c), this defendant will permit plaintiff to review such records at a mutually convenient time, and at GAF's offices.

INTERROGATORY 102:

Did you or do you have any sales offices in Delaware, Maryland, the District of Columbia or Virginia? If so please state:

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a. Their addresses;

b. All managers from 1930 through 1975 and the years during which they served;

c. All sales personnel;

d. The last known addresses of any persons listed in answers to Subparts b. or c.

ANSWER TO INTERROGATORY 102:

(a)

1500 South Ponca Street
P.O. Box 5166
Baltimore, Maryland 21224

4030 Benson Avenue
Baltimore, Maryland 21227

1324 North Battlefield
Boulevard, Suite 3D
Chesapeake, Virginia 23320

7310 Ritchie Highway
Empire Towers Suite 405
Glen Burnie, Maryland 21061

34 Charles Street
P.O. Box 1418
Hagerstown, Maryland 21470

9730C George Palmer Highway
Lanham, Maryland 20801

5600 East Virginia Beach
Boulevard
Norfolk, Virginia 23502

7942 A Angus Court
Springfield, Virginia 22153

1101 15th Street N.W.
Suite 200
Washington, D.C. 20005

(b - d) This defendant objects to sections b-d of this interrogatory on the grounds that it is unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as it seeks information which is not relevant to the subject matter which is the delivery of asbestos-containing thermal insulation products to jobsites on which and during years in which plaintiff actually worked.

INTERROGATORY 103:

If answer to 102 is negative, which of your sales personnel were responsible for sales in Maryland from 1930 through 1975, during what years, what are their last known addresses and are any still your employees?

ANSWER TO INTERROGATORY 103:

Not applicable.

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INTERROGATORY 104:

Which of your employees were responsible for the sale and/or marketing of your asbestos-containing products from 1930 through 1975:

a. To shipyards;

b. For Maritime applications;

c. To the United States Navy.

ANSWER TO INTERROGATORY 104:

This defendant objects to this interrogatory on the grounds that it is unduly burdensome and it is not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as it seeks information which is not relevant to the subject matter.

INTERROGATORY 105:

For each of the persons listed in Answer 104 please state:

a. The job positions held;

b. The years during which your company;

c. The persons last known address;

d. Whether the person is now your employee.

ANSWER TO INTERROGATORY 105:

Not applicable.

GAF Corporation

By: _____

Jonathan Berger
Vice President

STATE OF NEW YORK, CITY OF NEW YORK TO WIT:

JONATHAN BERGER being duly sworn, says that she is authorized to execute these Answers to Interrogatories on behalf of GAF Corporation and that the information contained in

such Answers is true to the best of her knowledge, information and belief.

SUBSCRIBED AND SWORN before me, a Notary Public, this 21st day of July, 1981.

Margaret Stackpool
Notary Public

My Commission Expires:

Notary Public, State of New York
No. 41-9145350, Qual. in Queens Co.
Certificate filed in New York County
Commission Expires March 30, 1982

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of July, 1981, a copy of the aforegoing Defendant GAF Corporation's Answers to Plaintiff's Interrogatories was mailed, postage prepaid, to:

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