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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

FREDERICK LE GRANDE,

Plaintiff,

-vs-

JOHNS MANVILLE PRODUCTS CORPORATION, a corporation of the State of Delaware,

Defendant.

Civil No. 741-57

ANSWERS TO INTERROGATORIES

The defendant, Johns Manville Products Corporati answering the interrogatories propounded by the plaintiff, states on information and belief the following:

1. This defendant has no controlled subsidiaries nor did it sell any products to H. W. Porter & Co. This deponent has been informed that the following products manufactured by this defendant have been sold to H. W. Porter & Co by Johns-Manville Sales Corporation during the years 1952 to 1956, inclusive:

Superex
Moulded pipe covering and blocks and cement calcined diatomaceous silicate combined with asbestos fiber.

Thermobestos
Moulded pipe covering and blocks
hydrous calcium silicate combined with asbestos fiber.

Magnesia Pipe covering
Moulded pipe covering and blocks and cement hydrated basic carbonate of magnesia bonded with asbestos fiber.

Asbesto-Sponge Felted
Pipe insulation, sheets and blocks
laminated asbestos fiber felts.

Asbestocel
Pipe insulation sheets and blocks and flexible roll form
laminated asbestos felts.

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Millboard
Fire Felt
D. C. Flexstone
Firetard
Bonded asbestos fibers.

Insulating Cements 301, 302
Asbestos fiber with various bonding materials.

2 & 3. The foregoing products have the percentage of asbestos fibers and diatomite as follows:

	Asbestos	Diatomite
Magnesia Pipe covering	5- 10	
Superex	5- 10	60-70
Thermobestos	10- 15	40-50
Asbestos Sponge Felt	85- 95	
Asbestocel	85- 95	
D. C. Flexstone	60- 70	
Fire Felt	90-100	
Millboard	85- 95	
Firetard	60- 70	
Insulating Cements		
301	10- 15	10-15
302	40- 50	20-30

4. No.

5. Stricken by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958.

6. Stricken by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958.

7. (a), (b), (c), (e) stricken by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958.

(d) No such research was conducted by this defendant.

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8. Stricken by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958.

9. Stricken by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958.

10. (As modified by order of Hon. Reynier J. Wortendyke Jr. dated January 17, 1958) See answer to No. 7 (d).

11. (As modified by order of Hon. Reynier J. Wortendyke Jr. dated January 17, 1958) It was not.

12. (As modified by order of Hon. Reynier J. Wortendyke Jr. dated January 17, 1958)

(a) This defendant supplies respirators to such of its employees as are engaged in manufacturing operations in which asbestos particles are used. The respirators are not limited to a particular brand, but any brand may be used which has the approval of the U. S. Bureau of Mines for use for pneumoconiosis producing dusts.

(b) Respirators have been used intermittently for approximately 25 years.

(c) See (a). The respirators have been used a various plants of this defendant.

(d) The use of respirators was adopted as a result of various Industrial Hygiene Foundation surveys.

(e) Approximately 25 years ago.

(f) This deponent has no knowledge of any case asbestosis ever being contracted by an applicator. Asbestosis was first contracted by an employee of this defendant at one of its plants in 1946.

13. This deponent has been informed that the products named in the answer to interrogatory No. 1 which may contain particles or dust which may cause fibrosis if the particles

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are of the requisite size and are inhaled in sufficient quan· are: Magnesia Pipe covering, Superex Block Insulation, Superex M Block Insulation and Superex Combination Pipe Insulation. We have no knowledge of any case of disease ever being developed by an applicator of the products listed above We know from experience in our plants that workmen engaged in the formation of these products have developed such a disease See answer to No. 12 (f).

14. Stricken by order of Hon. Reynier J. Wortendyke Jr. dated January 17, 1958.

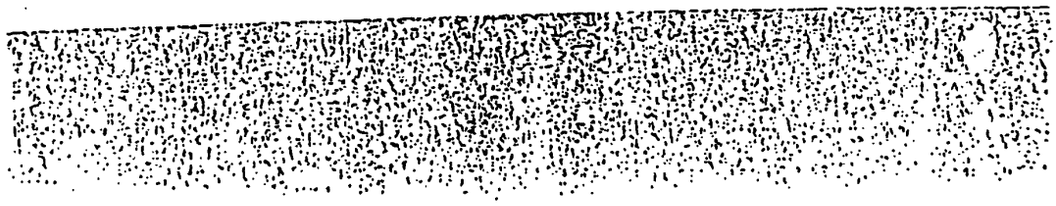
15. Since this defendant never received notice of any claim of asbestosis resulting to any persons other than our employees who were engaged in the manufacture of the products, we had no reason to issue any warnings, instructions or preventions to any other persons.

16, 17 and 18. Stricken by order of Hon. Reynier J Wortendyke, Jr. dated January 17, 1958.

19. See answer to No. 15. Since this defendant never had any reason to believe its products were toxic or noxious, it has not taken any action to reduce or minimize such supposed hazards in its products.

20 and 21. This deponent does not know what facts may be regarded as relevant to this cause; however, the only persons now known to this deponent who have any knowledge concerning the matters set forth in the complaint or in these answers, in addition to himself, are:

Kenneth W. Smith, M.D., A. M. Schmidt, Frank Deeg, 22 East 40th Street, New York City; Wilbur H. Morris and Alton Stevens, H. W. Porter Co., Newark, New Jersey.



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22. (As modified by order of Hon. Reynier J. Wortendyke, Jr. dated January 17, 1958)

The name and address of persons, expert or otherwise, who may have knowledge of any facts in the case, in addition to those listed in the answer to the foregoing interrogatory No. 20 and No. 21, will be submitted to the plaintiff's attorney before trial.

23. To establish this defense this defendant will rely upon the nature of the products, the work performed, th knowledge and experience of the plaintiff and such facts as be developed upon further discovery procedures and upon the trial of the case.

24. See No. 23.

25. See No. 23.

26. Stricken by order of Hon. Reynier J. Wortendy Jr. dated January 17, 1958.

27. (a - e) This deponent has been told that the plaintiff worked for H. W. Porter & Co., but none of the oth details of his employment is known.

(f) See answer to No. 1.

(g) See answer to No. 1.

Whether H. W. Porter purchased products other than those which this defendant manufactured this deponent does not know, but since the business of this defendant is highly competitive, it is quite probable that H. W. Porter used products of other manufacturers as well.

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Johns-Manville Products Corporation's Answers to Interrogatories in Le Grande v. Johns-Manville (1958), Answers t... Published by AsbestosClaims.Law
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