1/30/81

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

LELOS WEDGEWORTH, et al,	:	
PLAINTIFFS,	:	CIVIL ACTION NO. J78-0002(N) AND ALL CASES CONSOLIDATED THEREWITH
VS.	:	
ARMSTRONG CORK, et al,	:	
DEFENDANTS.	:	
ROY LATHARN HART, et al,	:	
PLAINTIFFS,	:	CIVIL ACTION NO. S79-0033(N) AND ALL CASES CONSOLIDATED THEREWITH
VS.	:	
ARMSTRONG CORK, et al,	:	
DEFENDANTS.	:	

PLAINTIFFS, MRS. FRANKIE B. ATES, MRS. EVELYN BUCKELY, JAMES L. JACKSON AND MRS. MARJORIE JOHNSON'S, MASTER SET OF INTERROGATORIES PROPOUNDED TO THE DEFENDANTS

Pursuant to Rule 33, Federal Rules of Civil Procedure, the plaintiffs, Mrs. Frankie B. Ates, Mrs. Evelyn Buckley, James L. Jackson and Mrs. Marjorie Johnson, propound the following interrogatories directed to the defendants, Amatex Corporation, Armstrong Cork Company, Celotex Corporation, Combustion Engineering, Inc., Eagle-Picher Industries, Inc., Fibreboard, Flintkote, Forty-Eight Insulation, Inc., GAF Corporation, Johns-Manville Sales Corporation, Keene Corporation, Nicolet, Inc., Owens-Illinois, Inc., H. K. Porter Company, Inc., Raybestos-Manhattan, Inc., Rock Wool Manufacturing Company, Inc., Unarco, Amchem Products, Inc., Empire Ace Insulation Manufacturing Company, Anchor Packing Company, Hopeman Brothers, Inc., Crane Packing Company, Garlock, Inc., Herculite Protective Fabrics, Flexitallic Gasket Company, Darco Southern, Inc., Hoke, Inc., Rockwell International Corporation and Litton Systems, Inc., to be answered separately and under oath through any authorized officer or agent thereof, all within the time allowed by the rules.



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The term plaintiffs includes, where appropriate, plaintiff's decedent.

1. Have you purchased or assumed the assets and/or liabilities of, or otherwise acquired, any corporation or entity which has manufactured, distributed, processed, marketed or sold insulation products containing asbestos fibers or mined asbestos?

2. If your answer to the preceding question was in the affirmative, please state the following:

(a) the name of the acquired company;

(b) the date of acquisition.

3. Have you formed or owned or do you now own any other subsidiary corporation or entity which has manufactured, distributed, processed, marketed or sold insulation products containing asbestos fibers or mined asbestos?

4. If your answer to the preceding question was in the affirmative, state the following with respect to each such entity:

(a) the name of the company;

(b) the date you assumed ownership;

(c) the association of the subsidiary company with the mining, manufacture, processing, marketing, selling or other form of distribution of insulation materials containing asbestos fibers.

5. Have you, your predecessors or subsidiaries, at any time, engaged in the manufacture and sale under your own label of insulation products containing asbestos fibers.

6. Have any of the companies acquired by you ever engaged in the manufacture of insulation products containing asbestos?

7. Have you, your predecessors or subsidiaries at any time engaged in the distribution or sale of insulation products containing asbestos fibers manufactured by another company?

8. If the answer to one or more of the last three questions is affirmative, please state as to each affirmative answer the following:

(a) the trade or brand name of each such product manufactured and sold by you;

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(b) the trade or brand name of each such product manufactured by another company and distributed or sold by you;

(c) the trade or brand name of each product manufactured by each company acquired by you;

(d) the dates each of such products were placed on the market by you or any acquired company;

(e) the dates each of such products were withdrawn from the market by you or any acquired company;

(f) a description of the chemical composition of each such product, including the type of asbestos contained in each such product (i.e., amosite, chrysolite or croccidolite) and the quantative percentage of asbestos in each product;

(g) a description of the physical appearance of each such product, including the color, size, shape, texture and any other distinguishing physical characteristics;

(h) a detailed description of the intended use of each such product;

(i) the mining or milling concern from which the raw asbestos fiber was obtained;

(j) a detailed description of all containers or cartons in which each such product was packaged for distribution, including the color, size and configuration of the package, the color and design of the printing and logo on the container.

9. With respect to each of the products listed in response to subparts (a), (b) and (c) of the preceding question, please state each and every use you contemplated or intended for such product.

10. Have you at any time from 1930 to the present, caused to be placed on the packaging of the insulation products containing asbestos which were manufactured, sold or otherwise distributed by you, any labels, notices, instructions, warnings, cautions or other statements as to the safe or proper handling of such products or the possible harmful effects of exposure to asbestos, and if so, state with respect to each such product:

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(a) when the warning first appeared on the package of each product;

(b) the precise wording of the warning, when it first appeared;

(c) whether the warning was altered, amended or changed in any manner, and if so, how and when;

(d) where the warning was located on the product or packaging;

(e) whether any industrial psychologists or human factors engineers were consulted prior to instituting and designing any such warnings.

11. Have you at any time from 1930 to the present published and/or distributed any brochures, sales literature, pamphlets, letters, memoranda or other written materials of any kind or character, other than caution labels on packaging, which contained any notices, warnings, instructions, cautions, directions or other statements relative to the safe or proper handling of insulation products containing asbestos which were manufactured, sold or otherwise distributed by you, or the possible harmful effects of exposure to asbestos, and if so, state the following:

(a) the wording of each such statement;

(b) a description of each such printed material in which such statements were contained;

(c) the identification of each person or company or class of either to whom each such statement was issued;

(d) the method used to distribute the statements to persons likely to use the products;

(e) the date each such statement was issued;

(f) the name, address and job classification of each person who presently has possession of the above described documents.

12. Do you contend that while the plaintiff or the plaintiff's decedent worked with or around insulation products containing asbestos, he was aware that exposure to insulation products manufactured by you containing asbestos was associated with pulmonary disease, injury or damage?

13. If your answer to the preceding question was in the affirmative, please state:

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(a) the date on which you believe or contend he first became aware;

(b) the specific manner in which you contend or believe he first became aware;

(c) the specific source upon which you rely to support such belief or contention.

14. Please state whether any of the above listed plaintiffs have ever been employed by your company, a predecessors or subsidiary, for any period and, if so, please state which ones.

15. Please list each insurance carrier which has provided your company with workmen's compensation insurance coverage for any period between January 1, 1930 to the present, and with respect to each, give the inclusive dates of each period such company provided such coverage.

16. Please state the first time that any current or former employee of your company or any division or subsidiary thereof, including Canadian Johns-Manville, at any of your company's locations, plants, facilities or contract divisions, ever made or filed a claim during any period between January 1930 and the present, for workmen's compensation benefits as a result of respiratory or pulmonary conditions, illness or disease, including but not limited to, asbestosis, lung or brochogenic carcinoma, mesothelioma, pneumonoconiosis, silicosis-asbestosis, bronchitis or emphysema or other injury allegedly caused or contributed to by exposure to asbestos, and state the following:

(a) the name of such claimant;

(b) the date such claim was made;

(c) if a claim for benefits was filed, the agency with which such claim was filed and the style and number of such claim;

(d) the type injury or disease allegedly sustained;

(e) the disposition of such claim.

17. Please state whether your company, or any employee thereof, any of your present and/or former insurance carriers, any state agencies or any one else authorized by either, ever conducted any dust counts, air sampling surveys, inspections or other types

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of studies, investigations or tests to determine the levels of dust or asbestos fiber concentration in the air at any of your facilities where products containing asbestos were used or made, and if so, state the following with respect to each such study or test:

(a) the date of each such study or test;

(b) by whom was each study or test conducted;

(c) whether written reports or such studies or tests were prepared;

(d) the present location of such reports;

(e) whether the results of any such studies or tests were communicated by your company to users of such products, and if so, when and how;

(f) whether such data has been retained, collected, combined or analyzed in any data retrieval or processing facility or machine;

(g) the reason for conducting such study or test.

18. Please state whether you ever had a department, division or section devoted to scientific and/or medical research during the period from 1930 until the present time, and if so, please state when it was first formed.

19. Please state if your medical officers, hygenists or other employees, insurance carriers or their agents, ever made, at any time, reports, recommendations and/or suggestions to anyone in your company pertaining to the existence of a relationship between asbestos exposure and disease, or to risks or hazards to persons involved in the manufacture, installation or use of insulation products containing asbestos. If so, please state with respect to each such recommendation, report or suggestions:

(a) when were each such recommendations, reports and/or suggestions made;

(b) to whom were each such recommendations, reports and/or suggestions made;

(c) by whom were each of these recommendations, reports and/or suggestions made;

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(d) the substance of each of the recommendations, reports and/or suggestions.

20. Please state whether you have ever conducted studies or research, or sponsored, participated with, or made financial contributions to any organizations, associations or other groups which during the time of your sponsorship or participation conducted studies or research relative to the relationship, if any, between exposure to asbestos and asbestosis, lung cancer, or other forms of pulmonary or other type disease, and if so, state the following:

(a) the amount contributed by you annually from 1930 to the present;

(b) the name of each such organization conducting the studies referred to;

(c) the date of each study conducted;

(d) the results and/or conclusions reached in each such study;

(e) whether any reports or recommendations were ever made to you as a result of any such studies, and if so, when were they made and what was the substance of each;

(f) the name and address of each person who currently has custody and/or possession of such reports or who has knowledge of such reports and/or recommendations.

21. Did you ever warn any labor union representing insulation workers of any potential health hazard from use and/or exposure to insulation products containing asbestos?

22. Do you contend that any other warnings or notifications were communicated to any labor unions representing the plaintiffs or their decedents regarding the potential health hazard from the use of and/or exposure to insulation products containing asbestos?

23. If the answer to either of the preceding two interrogatories is in the affirmative, please state:

(a) the union;

(b) how said union was informed;

(c) the date and place of said information or warning;

(d) the content and nature of each said warning;

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subsidiaries ever sold, distributed or otherwise supplied insulation materials containing asbestos to any of the plaintiffs' or their decedent's employers listed on his social security itemized statement of earnings for any period during any of the quarters he was employed by them or during any period for three months prior thereto, and if so, state the following:

(a) the name of each of the said employers for whom you furnished such materials;

(b) the date of each instance you furnished such materials to each such employer for the periods mentioned;

(c) the trade name and quantity of each insulation product containing asbestos furnished each such employer on each instance referred to in subpart (b) above.

29. Please give the name and address of each company which distributed or sold to other companies any of your insulation products containing asbestos in the States of Mississippi, Louisiana, Tennessee and/or Alabama for any period between January 1, 1945 to the present, and with respect to each such company state:

(a) the trade name of each product distributed by that company;

(b) the inclusive dates each such product was distributed in Mississippi, Louisiana, Tennessee and/or Alabama by that company;

(c) whether any of the distributorship arrangements or agreements were in writing, and if so, their present location;

(d) whether before 1972 you ever issued any advice, warnings or other forms of notification to any of the companies listed in response to this question as to the possibility of danger or harm which might result from the use of or exposure to your insulation products containing asbestos.

30. If your response to subpart (d) above was in the affirmati-, please state the following:

(a) to which companies you issued such notifications;

(b) the date each such notification was given;

(c) the form and specific content of each such notification.

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(e) the individual or individuals warned.

24. Please state the date, manner and source of information from which the corporation first became aware of:

(a) the potential harmful effect of exposure to asbestos;

(b) an association between exposure to asbestos by insulation mechanics applying insulation containing asbestos and the contraction of pulmonary disease;

(c) an association between inhalation of asbestos fibers and the contraction of mesothelioma;

(d) an association between inhalation of asbestos fibers and the contraction of cancer;

(e) an association between inhalation of asbestos fibers and the contraction of asbestosis;

(f) an association between inhalation of asbestos fibers and pulmonary disease, injury or damage.

25. Please state whether at any time prior to 1972 you ever notified, instructed or recommended to asbestos insulation mechanics applying your asbestos insulation products, and others working with or in the vicinity of such products or their employers, specifically of the need to wear respirators, masks or other protective devices or clothing when working with or in the vicinity of your insulation products.

26. Please state whether you, at any time prior to 1972, ever communicated to the plaintiff, his employers or any other anticipated consumers or users of your products a specific warning, instruction or recommendation against inhaling asbestos or dust containing asbestos.

27. If your answer to either of the preceding two questions was in the affirmative, please state the following with respect to each affirmative answer:

(a) the date you first gave such specific notification;

(b) the method of communicating such notification;

(c) the persons or firms to whom the notifications were sent.

28. Please state whether you or any of your predecessors or

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31. Please state whether at any time between January 1, 1945 and the present you have ever sold, supplied or caused to be shipped, any insulation product containing asbestos for use at the Ingalls Shipyard in Pascagoula, Mississippi.

32. Please state whether at any time between January 1, 1945 and the present you have ever sold, supplied or caused to be shipped, any insulation product containing asbestos to Shook & Fletcher Insulation Company.

33. Please state whether at any time between January 1, 1945 and the present you have ever sold, supplied or caused to be shipped, any insulation product containing asbestos to Badham Insulation Company.

34. Please state whether at any time between January 1, 1945 and the present you have ever sold, supplied or caused to be shipped, any insulation product containing asbestos for use at Frigitemp Insulation Company.

35. Please state whether at any time between January 1, 1945 and the present you have ever sold, supplied or caused to be shipped, any insulation product containing asbestos for use at Hopeman Brothers, Inc.

36. If your answer to any of the five preceding questions was in the affirmative, please state with respect to each affirmative answer:

(a) the trade or brand name of each product so sold, supplied or shipped;

(b) the date of each shipment between January 1, 1945 and the present.

37. If your company has not retained sufficient documentary information to enable you to provide the information requested in the preceding question, then please give the name, address and telephone number of each present or former employee of whom you are aware who would know the answer to the six preceding questions or whose present or former employment with your company was such that would have placed him or her in a position of having knowledge or information about the information requested in the six preceding

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questions.

38. Please list each of your insulation products containing asbestos which has been listed or qualified on a "Qualified Products List of Product Qualified Under Military Specification," or which met standards or specifications for installation upon vessels constructed, repaired or overhauled by or for the United States Government or any branch, agency or service thereof, at any time between January 1, 1945 and December 31, 1978, and with respect to each such product, give the inclusive dates it was on such list or met such standards.

Respectfully submitted,

Dated:

January 30, 1981

BLATT & FALES
Post Office Box 365
Barnwell, South Carolina 39812

CUPIT & MAXEY
Post Office Box 22666
Jackson, Mississippi 39205

ATTORNEYS FOR PLAINTIFFS

By: _____
OF COUNSEL

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CERTIFICATE

The undersigned certifies that on the date set forth hereinafter, a true and correct copy of the above and foregoing SUPPLEMENTAL SET OF INTERROGATORIES was mailed, postage prepaid to Alex A. Alston, Jr., Esquire, P. O. Drawer 1532, Jackson, MS 39205, attorney for Combustion Engineering, Inc.; Jeffrey R. King, Esquire, P. O. Box 789, Vicksburg, MS 39180, attorney for Flintkote; Roy C. Williams, Esquire, P. O. Box 787, Pascagoula, MS 39567, attorney for Johns-Manville Sales Corporation; Junior O'Mara, Esquire, P. O. Box 22567, Jackson, MS 39205, attorney for Owens-Illinois, Inc., and Nicolet, Inc.; Walter Eppes, Jr., Esquire, P. O. Box 3311, Meridian, MS 39301, attorney for H. K. Porter Company, Inc.; W. Swan Yerger, Esquire, 1030 Capital Towers, Jackson, MS 39201, attorney for Raybestos-Manhattan, Inc.; Natie Craway, Esquire, P. O. Box 651, Jackson, MS 39205, attorney for Rock Wool Manufacturing Company, Inc. and Celotex Corporation; William F. Goodman, III, Esquire, P. O. Box 650, Jackson, MS 39205, attorney for GAF Corporation, Heber Ladner,Jr., Esquire, 407 Riverhill Tower, 1675 Lakeland Drive, Jackson, MS 39216, attorney for Unarco; Cary Bufkin, Esquire, P. O. Box 157, Jackson, MS 39205, attorney for Owens-Corning Fiberglas Corporation, Dorrance Aultman, Esquire, P. O. Box 750, Hattiesburg, MS 39401, attorney for Armstrong Cork Company; Curtis E. Coker, Esquire, P. O. Box 1084, Jackson, MS 39205, attorney for Pittsburgh Corning Corporation; Jerry Langford, Esquire, P. O. Box 131, Jackson, MS 39205, attorney for Amatex Corporation, Michael S. Allred, Esquire, P. O. Box 847, Jackson, MS 39205, attorney for ACandS, Inc.; Louis G. Baine, Jr., Esquire, P. O. Box 16183, Jackson, MS 39206, attorney for Fibreboard Corporation; Wade Lagrone, P. O. Box 466, Tupelo, MS 38801, attorney for Eagle-Picher Industries, Inc.; John H. Holloman, Esquire, P. O. Box 427,

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Jackson, MS 39205, attorney for Garlock, Inc.; Suzanne Saunders, Esquire, P. O. Box 16295, Jackson, MS, attorney for Hopeman Brothers, Inc.,; Thomas W. Tyner, Esquire, P. O. Box 31, Hattiesburg, MS 39401; attorney for Anchor Packing Company; Ernest Graves, Esquire, P. O. Box 4326, Laurel, MS 39440, attorney for Keene Corporation; Ronald G. Peresich, Esquire, P. O. Drawer 289, Biloxi, MS39522, attorney for Forty-Eight Insulation; Karl Wiesenberg, Esquire, P. O. Box 26, Pascagoula, MS 39567, attorney for Litton Systems; Grover E. Asmus, II Esquire, P. O. Box 290, Mobile, AL 36601, attorney for American Mutual Corporation and American Mutual Liability Insurance Company; Alben Hopkins, Esquire, P. O. Drawer K, Gulfport, MS 39501, attorney for Rockwell International Corporation; M. M. Roberts, Esquire, P. O. Box 879, Hattiesburg, MS 39401, attorney for Amchem Products, Inc., Foster Division; Rae Bryant, Esquire, P. O. Box 10, Gulfport, MS 39501, attorney for Flexitallic Gasket Company, Walker W. Jones, III, Esquire, 1080 Flynt Drive, Jackson, MS 39208, attorney for Garlock, In

This the 30th day of JANUARY, 1981.

DANNY E. CUPIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

LELOS WEDGEWORTH, et al,	:	
PLAINTIFFS,	:	CIVIL ACTION NO. J78-0002(N) AND ALL CASES CONSOLIDATED
VS.	:	THEREWITH
ARMSTRONG CORK, et al,	:	
DEFENDANTS.	:	
ROY LATHARN HART, et al,	:	
PLAINTIFFS,	:	CIVIL ACTION NO. S79-0033(N) AND ALL CASES CONSOLIDATED
VS.	:	THEREWITH
ARMSTRONG CORK, et al,	:	
DEFENDANTS.	:	

PLAINTIFFS, LELOS WEDGEWORTH, ROY LATHARN HART, MRS. FRANKIE B. ATES, MRS. EVELYN BUCKLEY, JAMES L. JACKSON AND MRS. MARJORIE JOHNSON'S, AMENDED SUPPLEMENTAL SET OF INTERROGATORIES PROPOUNDED TO THE DEFENDANTS

Pursuant to Rule 33, Federal Rules of Civil Procedure, the plaintiffs, Mrs. Frankie B. Ates, Mrs. Evelyn Buckley, James L. Jackson, Lelos Wedgeworth, Roy Latharn Hart and Mrs. Marjorie Johnson, propound the following interrogatories directed to the defendants, Celotex Corporation, Combustion Engineering, Inc., Flintkote, Johns-Manville Sales Corporation, Nicolet, Inc., Owens-Illinois, Inc., H. K. Porter Company, Inc., Raybestos-Manhattan, Inc., Rock Wool Manufacturing Company, Inc., Unarco, Amchem Products, Inc., Empire Ace Insulation Manufacturing Company, Crane Packing Company, Flexitallic Gasket Company, Keke, Inc. and Litton Systems, Inc., to be answered separately and under oath through one authorized officer or agent thereof, all within the time allowed by the rules:

The following definitions apply with respect to these interrogatories:

A. Defendants are referred to in the corporate name under which they are sued. However, the interrogatories are defined to include and embrace all present and past subsidiaries, predecessor entities or previous names which the said defendant had or went by or was known.

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B. The term "you" or "your" or any synonym thereof is defined to embrace and include: (a) the named defendant or any subsidiary or division thereof, including Canadian Johns-Manville, at any of the defendant's locations, plants, facilities or contract divisions, as well as (b) all predecessor entities whether acquired by cash purchase, merger, stock purchase, name change or otherwise, and subsidiary entities currently or formerly held by the named defendant or any predecessor entity and/or (c) all officers, agents, servants, employees, representatives, investigators, attorneys or others who are in possession of and may have obtained information for or on your behalf.

1. With respect to each plaintiff listed above, please state specifically each and every fact, as distinguished from conclusory allegations, which you now know or rely upon to support your contention contained in your answer that the plaintiff misused or abnormally or improperly used some or all of the products referred to in the complaint.

2. With respect to each plaintiff listed above, please state specifically each and every fact, as distinguished from conclusory allegations, which you now know or rely upon to support your contention contained in your answer that the plaintiff assumed the risk of dangers complained of in the complaint.

3. With respect to each plaintiff listed above, please state specifically each and every fact, as distinguished from conclusory allegations, which you now know or rely upon to support your contention contained in your answer that the plaintiff himself was negligent in connection with the use of and exposure to the products referred to in the complaint.

4. With respect to each plaintiff listed above, please state specifically each and every fact, as distinguished from conclusory allegations, which you now know or rely upon to support your contention contained in your answer that if the plaintiff has suffered any injuries or damages alleged in the complaint, they resulted solely from acts and omissions of persons other than you,

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which constituted an independent, intervening and sole proximate cause of the injuries and/or damages complained of in the complaint.

5. Please give the name, address and telephone number of each individual whose acts or omissions you believe caused or contributed to the injuries and/or damages complained of in the complaint.

6. With respect to each plaintiff listed above, do you contend that if the plaintiff suffered any injury as a result of the actions complained of in the complaint, then such injury or damage was proximately caused or contributed to by actions or omissions of persons or entities other than you?

7. If your answer to the preceding question was in the affirmative, please state specifically the name, address and telephone number of each individual or entity you contend caused or contributed to such injury or damages.

8. With respect to each individual or entity listed in your response to the preceding question, please state specifically each act or omission you contend caused or contributed to such injuries or damage and with respect to each such act or omission, please state specifically each and every fact, as distinguished from conclusory allegations, which you now know or upon which you presently rely to support such contentions.

9. Please list the name, address and telephone number of each individual who you know or believe has personal knowledge of any of the facts set forth in your responses to questions 1, 2, 3, 4, 5, 6, 7 and 8, and indicate which responses each such individual has knowledge of.

10. Have you or anyone acting on your behalf, including but not limited to your attorneys, insurance agents, adjusters or investigators, obtained any statements, reports, notes or memoranda in any form from anyone concerning any of the following areas of information:

(a) the state of the medical knowledge regarding the connection between asbestos exposure and the contracting of pulmonary diseases, including mesothelioma, cancer or asbestosis;

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(b) any of the above listed plaintiffs' or decedents' employment history, product exposure or medical condition or history;

(c) other individuals with knowledge about the subject matter of this litigation.

11. If your answer to the preceding question or any subpart thereof was in the affirmative, please state the following:

(a) the name and address of each person from whom such notes, statements, reports or memoranda were received;

(b) the name and address of the person having custody of each such statement, report, note or memoranda;

(c) the date of each such statement, report, note or memoranda.

12. State whether your attorney or anyone acting on your behalf including but not limited to insurance agents, adjusters or investigators, has taken or made any notes, memoranda, reports, summaries or statements as a result of any conversations or interviews with other individuals having knowledge of any facts concerning the areas of information referred to in interrogatory 11 above.

13. If your answer to the preceding question was in the affirmative, please state the following with respect to each such summary, report, statement, note or memoranda:

(a) the name and address of the person making it;

(b) the date of it;

(c) the name and address of the person having current custody or possession of it.

14. Please identify each individual named on the defendants' witness list who you will or may call as an expert witness to give opinion testimony in the trial of this cause and with respect to each, state the following:

(a) the field in which he or she is to be offered as an expert;

(b) the substance of the facts to which he or she is expected to testify;

(c) the substance of the opinions to which he or she is expected to testify and a summary of the grounds for such opinion;

(d) a summary of his or her qualifications within the field he or she is expected to testify.

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15. With respect to each person named on the defendants' witness list not identified in response to the preceding question as an expert witness, please state the following:

(a) whether such person has given a written or oral statement to you or someone acting on your behalf;

(b) whether such person has personal knowledge of any of the material facts of either of these lawsuits, and if so, which ones;

(c) a complete summary of the facts to which he or she is expected to testify.

16. Please give the name, address, telephone number and place of employment of all persons whom you have retained or employed in anticipation of litigation or for trial preparation purposes whom you do not expect to call as a witness at trial.

17. Please state when you first learned of the identification of any product which could be reasonably used as a substitute for asbestos in your insulation products.

18. Please state whether you, your insurance carriers or any other persons, firms or corporations authorized by you, have employed, retained, commissioned or authorized any person, firm or corporation to conduct any polls, attitude surveys, interviews or samplings of people in the State of Mississippi at any time within the past three (3) years.

19. Please state whether you, your insurance carriers or any other persons, firms or corporations authorized by either, have conducted any polls, attitude surveys, interviews or samplings of people in the State of Mississippi at any time within the past three (3) years.

20. Please state whether you, your insurance carriers or agents of either, have been made aware of any polls, attitude surveys, interviews or samplings conducted, planned or to be conducted in the State of Mississippi within the past three (3) years.

21. Please identify any person, firm or corporation employed, retained, commissioned or authorized by you to conduct any polls, attitude surveys, interviews or samplings in the State of Mississippi at any time within the past three (3) years.

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22. Please give the location of any polls, attitude surveys, interviews or samplings and working papers thereof, conducted in the State of Mississippi by you or any person, firm or corporation authorized by you.

23. By way of a request to produce documents, please attach to your responses, a copy of all results, reports, memoranda, notes, correspondence, questionnaires, computer print-outs or programs, working papers or other documents concerning or in any way relating to any poll, attitude survey, interviews or samplings, conducted in the State of Mississippi by you or any person, firm or corporation authorized, employed, retained, commissioned or known by you within the preceding three (3) years.

Dated:

April 14, 1981

Respectfully submitted,

BLATT & FALES
P. O. Box 365
Barnwell, S. C. 29812

PATE & PETERS
P. O. Box 1245
Mobile, AL 36633

CUPIT & MAXEY
P. O. Box 22666
Jackson, MS 39205
ATTORNEYS FOR PLAINTIFFS

By: _____
OF COUNSEL

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CERTIFICATE

The undersigned certifies that on the date set forth hereinafter, a true and correct copy of the above and foregoing PLAINTIFFS' AMENDED SUPPLEMENTAL SET OF INTERROGATORIES PROPOUNDED TO THE DEFENDANTS was mailed, postage prepaid to Alex A. Alston, Jr., Esquire, P. O. Drawer 1532, Jackson, MS 39205, attorney for Combustion Engineering, Inc.; Jeffrey R. Fine, Esquire, P. O. Box 789, Vicksburg, MS 39180, attorney for Flintkote; Roy C. Williams, Esquire, P. O. Box 787, Pascagoula, MS 39567, attorney for Johns-Manville Sales Corporation; Junior O'Hara, Esquire, P. O. Box 22567, Jackson, MS 39205, attorney for Owens-Illinois, Inc., and Nicolet, Inc.; Walter Eppes, Jr., Esquire, P. O. Box 3311, Meridian, MS 39301, attorney for H. K. Porter Company, Inc.; W. Swan Yerger, Esquire, 1030 Capital Towers, Jackson, MS 39201, attorney for Raybestos-Manhattan, Inc.; Natie Caraway, Esquire, P. O. Box 651, Jackson, MS 39205, attorney for Rock Wool Manufacturing Company, Inc. and Celotex Corporation; William F. Goodman, III, Esquire, P. O. Box 650, Jackson, MS 39205, attorney for GAF Corporation, Jober Lariner, Jr. Esquire, 407 Riverhill Tower, 1675 Lakeland Drive, Jackson, MS 39[illegible] attorney for Unarco; Cary Bufkin, Esquire, P. O. Box 157, Jackson MS 39205, attorney for Owens-Corning Fiberglas Corporation, Porrance Aultman, Esquire, P. O. Box 750, Hattiesburg, MS 39401, attorney for Armstrong Cork Company; Curtis E. Coker, Esquire, P. O. Box [illegible] Jackson, MS 39205, attorney for Pittsburgh Corning Corporation; Jerry Langford, Esquire, P. O. Box 131, Jackson, MS 39205, attorney for Amate Corporation, Michael S. Allred, Esquire, P. O. Box 867, Jackson, MS 39205, attorney for ACandS, Inc.; Louis G. Baine, Jr., Esquire, P. O. Box 16183, Jackson, MS 39206, attorney for Fibreboard Corporation Wade Lagrone, P. O. Box 466, Tupelo, MS 38801, attorney for Eagle-Picher Industries, Inc.; John H. Hollowan, Esquire, P. O. Box 427,

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This the 14th day of April, 1981.

DAIRY E. CUPIT

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