

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE:	:	
SPARROWS POINT STEEL PLANT	:	BML-3
ASBESTOS CASES	:	ALL CASES

RESPONSE OF PITTSBURGH CORNING CORPORATION TO PLAINTIFFS' MASTER SET OF INTERROGATORIES

GENERAL OBJECTION

This Defendant manufactured an asbestos thermal insulation product, UNIBESTOS, from July 1, 1962 to February 1, 1972. Unless otherwise stated in answer to specific interrogatories, the responses herein shall be limited to such product and time period. This Defendant objects to providing answers for any other period of time on the grounds that such additional information is irrelevant, immaterial, not calculated to lead to the discovery of admissible evidence and, furthermore, could be burdensome, expensive and harassing to comply with.

The mineral asbestos may be found in a wide variety of product forms, including ceiling tiles, floor tiles, gaskets, gloves, mastics, protective aprons, protective matting, etc. This Defendant objects generally to these interrogatories as vague, overly broad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence so far as they relate or refer to unidentified asbestos-containing products or materials and will limit its answers as stated above.

This Defendant states that there never existed a predecessor corporation with respect to Defendant; further, Defendant states that its answers to any interrogatory herein related only to this Defendant and are not to be construed to imply the existence of a predecessor corporation.

This Defendant at this time is supplying Answers to Interrogatories 1 through 85 and 93 with the understanding that these Answers are applicable to all cases in the BML-3 litigation. The Answers may be supplemented in the future but need not be supplied anew again, even in the BML-3 cases filed after the date of filing these Answers. This Defendant considers Interrogatories 86 through 92 and 94 through 97 to be questions calling for responses unique to each Plaintiff,

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and will supply separate answers as to each Plaintiff according to the applicable Discovery Orders issued by the Court.

1. Please state the name, address and job title of each person who has supplied information used in the answer of these interrogatories, indicating with specificity the area or areas of information for which such person is responsible.

ANSWER: Robert E. Buckley (Retired) Consultant
Former Vice President and Assistant to President
800 Presque Isle Drive
Pittsburgh, Pennsylvania 15239
(412) 327-6100

2. Please state whether or not you are a corporation. If so, state your correct corporate name, state of incorporation, address of principal place of business and whether or not you have regularly conducted business in the State of Maryland.

ANSWER: This Defendant is a corporation.

Pittsburgh Corning Corporation.

Pennsylvania

800 Presque Isle Drive

Pittsburgh Pennsylvania 15239

This Defendant has not regularly conducted business in the State of Maryland.

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3. Do you have any predecessors in interest who manufactured any product made with asbestos or asbestos components within the period of time commencing in 1926 until you succeeded to the interest of any such predecessor, if so:

a. What was the name of any and all predecessor(s);

b. Give the date on which your relationship with such predecessor(s) commenced;

c. By what manner was each predecessor acquired by you, i.e., purchase, merger, change of name, etc.;

d. Describe each asbestos or asbestos-containing product manufactured by such predecessor and in so doing give its name, product name, dates of manufacture, percentage of asbestos and type of asbestos.

e. State whether such predecessor(s) supplied asbestos products to any Bethlehem Steel Corporation facility and particularly the Bethlehem Steel Sparrows Point, Maryland facilities and, if so, describe each such product so sold or supplied by any or each predecessor including date of sale, brand and product name, when sold, to whom sold, destination of each product sold or shipped.

ANSWER: No.

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4. Do you have any predecessors in interest who sold or distributed any product made with asbestos or asbestos components?

If so,:

a. What was the name of each such predecessor?

b. Give the date on which your relationship with such predecessor commenced;

c. By what manner was the predecessor acquired by you, i.e., purchase, merger, change of name, etc.;

d. Describe each asbestos or asbestos-containing product sold or distributed by each such predecessor;

e. State whether such predecessor(s) supplied such asbestos products to Bethlehem Steel Corporation and if so, describe each such product so sold or supplied to Bethlehem Steel Corporation and state to whom sold, when sold, to what location the products were sold or shipped.

ANSWER: No.

5. When did you or your predecessor(s) in interest first manufacture each and any product made with asbestos or asbestos components and in answering, if you have manufactured more than one such product please identify and give the date of initial and final manufacture of each such product, a

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description of each such product including the percentage of asbestos in each by type and the intended marketable use for each such product.

ANSWER: This Defendant manufactured and sold UNIBESTOS for the first time on July 1, 1962 on which date it purchased selected assets and facilities from Union Asbestos and Rubber Company (UNARCO) which it then utilized in the manufacture of UNIBESTOS. This Defendant does not have specific knowledge as to when UNIBESTOS was first commercially sold, however, this Defendant believes the product was first sold by UNARCO as early as 1954. Further, this Defendant has no knowledge with respect to UNARCO's actions concerning the designing, developing, testing and packaging of the product during and after the product's introduction into the market. This Defendant ceased manufacturing its asbestos thermal insulation product on February 1, 1972.

Rigid 3-foot long, half cylinders of thermal insulation for piping.

UNIBESTOS contained 6.5% - 5.6% asbestos fiber per Unit Volume of Insulation.

Pipe Insulation.

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6. When did you or your predecessor in interest first sell or distribute each and any product made with asbestos or asbestos component and in answering, if you have sold or distributed more than one such product, please identify and give the date of initial and final distribution of each such product and as to each product state if you sold or supplied such product to Bethlehem Steel Corporation and particularly the Bethlehem Steel Company, Sparrows Point, Maryland facilities, and give the time period by dates within which you did so sell or supply each such product to Bethlehem Steel Corporation.

ANSWER: This Defendant did not sell its product to Bethlehem Steel in the State of Maryland. However, records reflect that perhaps $62.00 worth of Unibestos was provided to Bethlehem Steel in Allentown, Pennsylvania in 1964.

7. Have you ever manufactured any product made with asbestos or asbestos components? If so, identify each such product including dates of manufacture, brand name, product name, percentage of asbestos content by type of asbestos.

ANSWER: See answer to Interrogatory No. 5.

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8. Have you sold, supplied or distributed or do you now sell, supply or distribute any product made with asbestos or asbestos components? If your answer is in the affirmative, identify each such product by date of sale or distribution, brand name, product name, percentage asbestos by type and the manufacturer of each such product.

ANSWER: See answer to Interrogatory No. 5.

9. If you have discontinued manufacturing and/or selling or distributing products made with or from asbestos or asbestos components, state when you did so discontinue, identify the said products so discontinued, give the date of such discontinuance and in answering state the reason or reasons for such discontinuance.

ANSWER: The decision to close this Defendant's asbestos thermal insulation plants was made in the latter half of 1971 and this Defendant permanently ceased production of UNIBESTOS on approximately February 1, 1972. This Defendant ceased the manufacture of its asbestos thermal insulation product due to the recognition that it was not economically or practically possible to install equipment which would conform to proposed federal standards regarding the

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manufacturing process, an increasing awareness of the suspicion that inhalation of asbestos fibers could conceivably create possible health hazards in circumstances not previously believed to be of concern, a lack of supply of the necessary raw material and a lack of profitability.

10. If you have done so, when did you first determine that any other material could be used in place of asbestos for high-temperature insulation or any other application to or for which asbestos has been applied in steel mills as well as other places. If you have in fact substituted other materials for asbestos in such products then state:

a. The identity of such substituted material or materials;

b. When the product with such substituted materials was first marketed;

c. Under what trade name was or is the product with substituted materials marketed.

ANSWER: This Defendant did not make a determination such as described herein.

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11. Please state the intended marketable use of each and every product in answer to Interrogatory nos. 7, 8 and 9.

ANSWER: See answer to Interrogatory No. 5.

12. Please state the quantitative percentage of asbestos or asbestos fibers in each and every product previously identified in the above answers by weight and volume.

ANSWER: See answer to Interrogatory No. 5. No information as to weight of asbestos content is in this Defendant's records.

13. Please state whether each and every asbestos product so identified contained either Chrysotile, Crocidolite, Amosite, Actinolite, Anthophyllite or Tremolite giving the percentage of each such asbestos fiber in the make-up of each product.

ANSWER: Unibestos contained 6.5% - 5.6% amosite asbestos fiber per Unit Volume of Insulation.

14. For the products identified in answer to interrogatory nos. 7 and 8, state as to each such product whether you have sold, supplied or shipped it to the Bethlehem

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Steel Corporation and if so, give the date when such sale occurred, the quantity by-product of each such sale and the place to which each such product was delivered.

ANSWER: See answer to Interrogatory No. 6.

15. For the products identified in answer to interrogatory nos. 7 and 8, state as to each such product whether you have sold, supplied or shipped it to the Bethlehem Steel Corporation, Sparrows Point Steel Plant and, if so, give the date when each such sale occurred, the quantity by product of each such sale and the place to which each such product was delivered.

ANSWER: See answer to Interrogatory No. 6.

16. State whether any asbestos products manufactured by you or your predecessor in interest have ever been distributed or sold by any other person, company, corporation or entity of any sort under his or its own product name or your product name. If so, state:

a. The terms of all agreements, licenses, arrangements and understandings which relate, refer or pertain to same and identify all documents relating to same.

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b. The identity of each such person, company, corporation or other entity.

c. Your brand name of each such asbestos product.

d. Your trademark name of each such asbestos product.

e. Your trademark name of each such asbestos product.

f. The corresponding brand name of each such asbestos product used by the distributor or seller of same.

g. The corresponding trademark name of each such asbestos product used by the distributor or seller of same.

h. The dates during which each such asbestos-containing product was distributed or sold under each of the corresponding brand and trademark names indicated above.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of admissible evidence. Without waiving this objection, this Defendant states it routinely sold its asbestos thermal insulation product to distributors who applied the product or who sold the product to other

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applicators or to user customers. Further, this Defendant did not participate in relabelling agreements with respect to UNIBESTOS.

17. State whether you have distributed or sold any asbestos products not manufactured by you under your own name or the name by which it was manufactured, distributed and/or sold by the manufacturers. If so, state:

a. The terms of all agreements, licenses, arrangements and understandings which relate, refer or pertain to same and identify all documents relating to same.

b. The identity of each such person, company, corporation or other entity whose asbestos products you have sold or distributed on a product-by-product basis.

c. The generic name or identity of each such asbestos product.

d. The manufacturer's brand name for each such asbestos product.

e. The manufacturer's trademark name for each such asbestos product.

f. Your corresponding brand name of each such asbestos product.

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g. Your trademark name of each such asbestos product.

h. The dates during which you distributed or sold each asbestos product under your corresponding brand name and/or trademark name and the asbestos content of each such product.

ANSWER: No. This Defendant did not participate in relabelling agreements with respect to UNIBESTOS. However, on July 1, 1962, this Defendant purchased selected assets and facilities of Union Asbestos and Rubber Company, which assets included a small amount of UNIBESTOS manufactured by the original producer. In addition, Defendant purchased small amounts of a product similar to UNIBESTOS and manufactured to this Defendant's specifications from Holmes Foundry in Ontario, Canada. These purchases took place in 1963 or 1964 and in early 1972 to fill orders from customers.

18. Did any one or more of the asbestos products manufactured and/or sold or distributed by you or your predecessor in interest contain any caution, warning, notice or other statement or explanation on the product or its

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packaging relating to health hazards, (whether possible, actual, etc.) of asbestos. If your answer is in the affirmative, then state as to each asbestos product:

a. when did a warning(s), notice(s) or statement(s) of this sort first appear on each such product or package in which such product was marketed and identify each person with knowledge of the reasons why the warning(s), notice(s) or statement(s) was used.

ANSWER: Beginning in November 1968, this Defendant caused a 5-inch by 3-inch notice to be printed in red on all cartons containing UNIBESTOS. The notice read as follows: "This product contains asbestos fibers. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by U.S. Bureau of Mines." A copy of the warning label is attached.

See also answer to Interrogatory No. 1.

b. What was the precise wording of the warning or other statement when it first appeared?

ANSWER: See a., above.

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c. Has the warning or statement been altered, amended or changed in any manner? If so, how and when was it amended. Identify each person with knowledge of the reasons for each amendment and set forth each amended warning or notice by date.

ANSWER: No.

d. Where was and is the warning or statement located on each such product or packaging?

ANSWER: Side of carton.

19. Do the asbestos products now and/or since April 1, 1972 manufactured and/or sold by you contain any caution, warning, notice or similar statement or explanation relating to the health hazards of asbestos on the product or its packaging? If so,:

a. When did the warning or other statement first appear?

b. What now is the precise wording of the warning or statement?

c. Where is it located on each product or packaging?

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d. Identify each person with knowledge of the reasons why this warning was placed on the product or its container.

ANSWER: Not applicable to this Defendant.

20. Please state the names and addresses of you and your predecessors in interest, chief or corporate medical officers from 1920 until the present time, listing the periods of time each such medical officer was employed by you.

ANSWER: This Defendant did not hire chief or corporate medical officers.

21. Please state to whom in the corporate structure the chief or corporate medical officer now reports or reported in respect to the tenure of each such chief medical officer, also giving that person's position or job title with you or your predecessor in interest.

ANSWER: Not applicable. See answer to Interrogatory No. 20.

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22. Please state the duties and resonsibilities of your chief medical officer and if such duties and responsibilities have been changed since 1920, describe the said amendment or any such duties or resonsibilities and give the date or dates on which such amendment or change occurred.

ANSWER: Not applicable. See answer to Interrogatory No. 20.

23. Please state if you or any predecessor in interest or anyone on your behalf or any predecessor in interest ever engaged or participated in any research or studies of asbestos dust and fibers and their effect on the persons coming in contact with and/or inhaling the asbestos dust or fibers. If so, please state:

a. The names and addresses of the individuals or groups who engaged or conducted such research;

b. The dates on or which such study or research was conducted;

c. The complete results of said research;

d. What recommendations, if any, were made as the result of said research;

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e. If either the results or recommendations of such research were written, please identify all documents which refer, relate or pertain to same and identify the custodian of each and all such documents.

ANSWER: This Defendant did not conduct studies as specifically described in this interrogatory. However, during the period 1966 through 1970, this Defendant participated in a study conducted by the Industrial Hygiene Foundation of America, Inc., chiefly to learn about the bio-chemical effects of amosite asbestos fibers on laboratory animals. A preliminary report indicated that amosite asbestos fibers were introduced into rats and that asbestosis was noted in some of the animals that were autopsied according to schedule for study purposes. The remaining animals were pastured for the purpose of observing whether lung cancer or mesothelioma tumors developed. According to Defendant's recollection, the pastured animals died unexpectedly in a laboratory epidemic about January 1972, before conclusions could be drawn concerning cancers or tumors.

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24. Please state if any of your or your predecessors in interest's medical officers, industrial hygienists, medical consultants or any other person in your employment ever made at any time any recommendations and/or suggestions to you or a predecessor in interest pertaining to the risks or hazards to persons involved in the manufacturing or use of asbestos products. If so, please state:

a. when such recommendation and/or suggestion was made;

b. To whom were such recommendations and/or suggestions made;

c. By whom were these recommendations and/or suggestions made;

d. The substance of the recommendations and/or suggestions.

ANSWER: In or around January, 1969, this Defendant's medical consultant stated that the suspected connection, in certain circumstances, between certain types of asbestos and certain adverse health consequences suggested the possibility that the asbestos in UNIBESTOS could perhaps eventually lead to adverse health consequences. This Defendant's medical consultant further suggested: The use of a warning

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label with the product; that the NIMA pamphlet be circulated; and that efforts be made to find a substitute for asbestos in UNIBESTOS. All of said "suggestions" had already been accomplished or initiated by Defendant.

25. Please submit the names and addresses of any organizations, groups, inter-company or industrial organizations including but not limited to: (a) Asbestos Textile Institute; (b) National Insulation Manufacturers Association; (c) Thermal Insulation Manufacturers Association; (d) Quebec Asbestos Mines Association; (e) Asbestos Information Association; (f) Industrial Health Foundation; (g) Industrial Hygiene Foundation; (h) Iron and Steel Institute; (i) National Safety Council; (j) Refractories Institute, to which you belong or belonged and in so doing state:

a. Dates of membership as to each;

b. Requirements of membership as to each;

c. Amount of money you contributed annually as to each.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of

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admissible evidence. Without waiving this objection, This Defendant states that it became a member of National Insulation Manufacturers Association (NIMA) in the late 1950's or early 1960's. Defendant now understands that the records of NIMA show that Defendant resigned about November 1965. This Defendant apparently rejoined at some later date, possibly in 1968. The Thermal Insulation Manufacturers Association (TIMA) is a successor association to National Insulation Manufacturers Association (NIMA).

26. In reference to interrogatory no. 25 for each such organization which conducted studies, did research, provided or disseminated information or suggestions, made recommendations as to, or in any way considered, discussed, addressed or dealt with the actual, alleged or possible health hazards associated with exposure to asbestos, please state:

a. The type or nature of each study and identity of the organization or person conducting same;

b. When the studies were conducted;

c. The complete results of the studies;

d. The recommendations of the studies;

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e. Whether you have documents referring, relating or in any way relevant to such studies and, if so, identify the custodian of same.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, vague and ambiguous and is not calculated to lead to discovery of admissible evidence.

27. Describe any and each action taken by you as the result of any such study, research or recommendation. In answering, please give the date of each action and give the name or names of those persons who initiated any or each action.

ANSWER: See answer to Interrogatory No. 26.

28. In reference to interrogatory no. 25, identify each officer, employee or representative who attended the meetings of each such organization or any of its committee or subcommittees or who was your designated liaison or representative to same, giving the dates of attendance for each, and identify all documents which refer, relate or

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pertain to the business or precedings whether formal or informal of each such group or any of its committees, subcommittees or related organizations.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of admissible evidence.

29. Identify all documents in your possession, custody or control and all documents about which you have knowledge which emanate from any one or more of the organizations listed in the preceding interrogatory which relate, refer or pertain in any to possible or actual health hazards or problems connected with the use of asbestos products, and identify the custodian of each such document.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, vague and ambiguous and is not calculated to lead to discovery of admissible evidence.

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30. Please state the amount of money spent or contributed by you or any predecessor in interest annually from 1920 until the present time for research into the relationship between the exposure to asbestos dust and fibers or products and any pulmonary pathology.

ANSWER: Not applicable. However, this Defendant's share of the cost of the study referred to in the answer to Interrogatory No. 23 was $35,000.

31. Please state the amount of money annually spent or contributed by you or a predecessor in interest to any independent medical research group or groups conducting research into the relationship between exposure to asbestos fibers or dust or products and any pulmonary pathology, and identify each person or organization to whom the expenditure or contribution was made.

ANSWER: See answer to Interrogatory No. 30.

32. Please identify your or your predecessors in interest's directors, managers or chiefs of the Environmental and Industrial Hygiene and Safety Department, Research and

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Development, or equivalents, from 1926 until the present time, listing as to each the respective periods each such person who was employed by you.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of admissible evidence.

33. Please identify all distributors or your or your predecessors in interest's asbestos products in the State of Maryland from 1920 until the present time.

ANSWER: Following is a partial list based on available records of distributors located in the State of Maryland who from time to time purchased Defendant's asbestos thermal insulation product during 1962-1972:

The McCormick Asbestos Co.
Baltimore, Maryland 21215

Walter E. Campbell Co., Inc.
10721 Tucker Street
Beltsville, Maryland 20705

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34. Please state whether any of the distributors identified in the preceding answer or any other entity to whom you sold or supplied asbestos products were provided by you with any instructions, oral or written, in regard to the use of such asbestos products to protect against inhalation of asbestos fibers. If so, please state:

a. When these instructions were given;

b. By whom and to whom these instructions were given;

c. State whether the instructions were oral or written;

d. The precise content of the instruction;

e. If the instructions were written, identify the current custodian of same.

ANSWER: See answer to Interrogatory No. 18. Further, in or about 1968, this Defendant participated in the distribution by mail and by hand of a National Insulation Manufacturers Association (NIMA) booklet to distributors describing precautions to be observed when handling, applying, removing or ripping out asbestos thermal insulation products. A Copy of the NIMA booklet is attached.

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35. State whether any of your employees has ever made a claim for occupational disease including pulmonary disease or injury, pneumoconiosis or any sort, silicosis and asbestosis under the occupational disease or workmen's compensation statute of any state, or any federal compensation statute, including but not limited to, the Longshoremen and Harbor Workers Compensation Act; if so, please state:

a. The date that you first received notice of any such claim for asbestosis under any occupational disease or workmen's compensation statute of any state or of the United States.

b. On a year-by-year basis, state the total number of your employees or your predecessors in interest's employees who filed claims for occupational lung diseases and in so doing state the number of claims or cases of pneumoconiosis by type including silicosis and asbestosis for each year and for each such year the number of employees who actually received benefits under any occupational disease or workmen's compensation statute for asbestosis, silicosis or any other lung pathology for the period 1920 until the present time.

ANSWER: Plaintiff was never employed by this Defendant and Defendant therefore objects to this interrogatory because it is irrelevant, immaterial and not

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calculated to lead to the discovery of admissible evidence. Without waiving this objection, this Defendant states no claims such as described herein were filed until about December 1971 after this Defendant announced it would close its asbestos thermal insulation product facilities.

36. Please describe in detail giving size, shape, color, markings, etc., the packaging and other containers used for each and every asbestos-containing product, and for each such year in which each such product was manufactured and sold by Defendant or Defendant's predecessors in interest, identify the supplier of each and every container.

ANSWER: During the period this Defendant manufactured an asbestos thermal insulation product, the product was shipped in paperboard cartons measuring three (3) feet in length. The other dimensions varied according to the diameters of the contents. Printed material on the carton included, among other information, the following: Corporate identification; product name; size of contents; generic description; corporate logo; warning label, beginning in 1968, which read: "This product

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contains asbestos fibers. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by the U.S. Bureau of Mines."

37. Does Defendant or did the Defendant's predecessors in interest prepare or publish any catalogues, brochures or other documents describing its products including particularly but not limited to, products containing asbestos or asbestos components and if so, identify each such catalogue, brochure or other documents with specificity and identify the present custodian of same.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. Without waiving this objection, this Defendant provides the attached copy of a typical UNIBESTOS promotional brochure.

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38. State whether you have been named as a Defendant in any lawsuit previous to this resent action by users or persons who actually or allegedly were exposed to any of your asbestos or asbestos-containing products for injury or disease. If your answer is in the affirmative:

a. Identify the date on which the first such lawsuit was so filed against you and state the style of the said lawsuit, identify the forum in which the said suit was filed and state the style of the action and the docket designation of the suit.

b. Commencing with the calendar year in which the lawsuit identified in (a) was instituted, state the total number of any such lawsuits which have been filed against you in each calendar year since the year in which the first such suit was so instituted.

c. If any verdicts have been returned against you in any such action by users of your asbestos products, give the style of each such lawsuit in which a plaintiff's verdict was so returned, identify the court in which each suit was tried, the docket number or designation of each suit and state the amount of the verdict returned against you.

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ANSWER: This Defendant objects to this interrogatory as this Defendant has been named as a Defendant in excess of 5,000 lawsuits and no compilation, by computer or other means, has been made of the information sought in this interrogatory and its sub-parts. It is not reasonable for this Defendant to be asked to provide, at great expense and under heavy burden in response to this overly broad interrogatory, information which would not be valuable to the plaintiff in this case.

39. State whether you contend that any person not presently a party to this action is responsible in whole or in part for any of the plaintiff's damages, and, if so, then identify each such person or party and give the facts which you allege support such contention.

ANSWER: Defendant objects to this Interrogatory because it is based on the improper assumption that Defendant acknowledges the occurrence of some injury giving rise to damages to the Plaintiffs. Defendant denies any suggestion of liability on the part of it or others for any damages that may be claimed by Plaintiffs. It is possible, however, that discovery will produce evidence that Plaintiffs were exposed to

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asbestos-containing products manufactured by Johns-Manville, and in that event, Defendant will rely on that evidence to support its claim that that exposure contributed to Plaintiffs' asbestos related disease, if any.

40. Identify each expert whom you expect to call as a witness in your defense in the trial of this action and, in answering, identify the area or areas as to which such expert will give testimony and has previously testified.

ANSWER: Defendant reserves the right to supplement this Answer in a timely fashion consistent with the Court ordered schedule. Until discovery has been conducted, Defendant lacks the information needed to decide which expert witnesses it will rely upon at trial.

41. If you contend that the asbestos products which you produced or sold were not dangerous to the health of persons coming into contact with same, state all facts, opinions, conclusions and identify all documents and any other

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information upon which you rely and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This Defendant objects to this Interrogatory on the ground that it calls for irrelevant speculation and is not calculated to lead to the discovery of relevant evidence. This Defendant does not have the burden of proving that asbestos products "were not dangerous to the health of persons coming into contact with same." Instead, Plaintiffs have the burden of proving either that this Defendant was negligent or that its products were defective and unreasonably dangerous. Defendant denies that it is liable for any damages claimed by Plaintiffs herein. Plaintiffs have the burden of proving this Defendant's liability. In view of this burden of proof, and the legal standard to which this Defendant is held, this Interrogatory is objectionable as irrelevant, calling for speculation and not calculated to lead to the discovery of relevant evidence.

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42. If you contend that asbestos products are not inherently dangerous, state all facts, opinions,conclusions and identify all documents and other information which supports your contention and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: See Answer to Interrogatory No. 41.

43. If you contend that you did not have a duty to warn users of your asbestos products including the Plaintiff about the risks and dangers of the use of and exposure to asbestos products, state all facts, opinions, conclusions and identify all documents and any other information upon which you rely and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents and the custodian of same.

ANSWER: See Answer to Interrogatory No. 41. In addition, Defendant denies that any Plaintiff used its products.

44. If you contend that you did not have a duty to warn the plaintiff's employer (Bethlehem Steel Company) about the risks and dangers of the use of and exposure to asbestos,

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state all facts, opinions, conclusions and identify all documents and any other information upon which you rely and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: See Answers to Interrogatories Nos. 6 and 41.

45. State when you first became aware that asbestos when breathed into the lungs was: (a) alleged to be hazardous to the breather; (b) acknowledged to be hazardous to the breather and from whom you obtained this information and what action you took, if any, upon receiving this information respectively.

ANSWER: Defendant is unable to state when it knew of any particular health hazard presently alleged to be associated with asbestos exposure. However, beginning perhaps as early as 1965 this Defendant gradually became aware of news media reports being circulated which indicated large amounts of certain types of respirable asbestos fibers inhaled over a long period of time under certain conditions might be

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related to adverse health consequences. This Defendant's awareness related mainly to manufacturing environments.

46. State when you first became aware that asbestos products were being labeled with warnings or notices concerning or referring to the risks or dangers of the use of and exposure to asbestos products and identify the product and manufacturer such warning or notice was connected with.

ANSWER: See answer to Interrogatory No. 45.

47. Identify the officer, agent, servant or employee of yours who first obtained such knowledge.

ANSWER: See answer to Interrogatory No. 45.

48. When did you first become aware that Johns-Manville Corporation or any of its affiliated companies was placing a label, notice or warning on its asbestos products regarding or concerning the risks or dangers of the use of and exposure to asbestos products?

ANSWER: 1968.

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49. When, if all, did you first place labels, notices or warnings on your asbestos products regarding or concerning the risks or dangers of the use of and exposure to asbestos products?

ANSWER: 1968.

50. If you did not place such a label, notice or warning on your asbestos products when you first learned that Johns-Manville Corporation, its affiliated companies or some other Corporation was placing such a notice or warning on its asbestos products, why did your refrain from doing so?

ANSWER: Not applicable.

51. If you content that you performed adequate tests of the safety of your asbestos products, state all facts, opinions, conclusions, and identify all documents and any other information which you assert supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and any other information, and identify the applicable documents.

ANSWER: This Defendant objects to this Interrogatory on the ground that it calls for irrelevant speculation and is not calculated to lead to the discovery of

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relevant evidence. This Defendant does not have the burden of proving that asbestos products "were adequately tested." Instead, Plaintiffs have the burden of proving either that this Defendant was negligent or that its products were defective and unreasonably dangerous. Defendant denies that it is liable for any damages claimed by Plaintiffs herein. Plaintiffs have the burden of proving this Defendant's liability. In view of this burden of proof, and the legal standard to which this Defendant is held, this Interrogatory is objectionable as irrelevant, calling for speculation, and not calculated to lead to the discovery of relevant evidence.

52. If you contend you did not conspire with others to allow asbestos products to be used without adequate warnings despite the known dangers, state all facts, opinions, conclusions and identify all documents and any other information which you assert supports this position and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

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ANSWER: This Defendant denies conspiring with others in the manner described in this Interrogatory, and therefore the balance of the Interrogatory is objectionable as Defendant is not required to prove the absence of evidence. Plaintiffs have the burden of proving their allegations, including conspiracy. In view of the burden of proof, this Interrogatory is objectionable.

53. Regarding information of any sort, facts, opinions, suggestions, recommendations or conclusions relating, referring or pertaining to the alleged, possible or actual risks and dangers of the use of and exposure to asbestos products, state all facts and information and identify all documents including letters, correspondence, memoranda, minutes of meetings, articles in journals, periodicals, etc. studies, reports, research or test results and any other information which you have as a result of a concerning direct and indirect exchanges, receipt and communication of information (1) between you and other manufacturers and suppliers of asbestos products; (2) between you and the Bethlehem Steel Company or any of its officers, agents, employees or consultants, (3) between you and any physician,

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hospital, medical institution, research laboratory or facility; (4) between you and any newspaper, magazine, journal or periodical; (5) between you and any insurance company; as to each state the date of such indirect or direct exchange, receipt or communication of information and identify any individuals who have knowledge of such exchange, receipt of communication of facts, opinions, recommendations, suggestions, conclusions and other information, and identify all documents which refer, relate or pertain to same, and identify all documents which refer, relate or pertain to same, and identify the present custodian of each.

ANSWER: This Defendant objects to this interrogatory on the basis that is it vague, ambiguous, overly broad and calculated to burden and harass Defendant.

54. State all facts, opinions, and conclusions and identify all documents and any other information which you have concerning the circumstances under which asbestos products can be safely handled and used; identify any individuals who have knowledge of such facts, opinions conclusions and other information, and identify the applicable documents.

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ANSWER: This Defendant is not presently engaged in the manufacture of an asbestos thermal insulation product and is therefore not qualified to render an opinion on the question set forth in this interrogatory.

55. State all facts, opinions, and conclusions, and identify all documents and any other information which you have concerning warnings which you have given to users of your asbestos products, and identify any individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: See answer to Interrogatory No. 18 and No. 34.

56. State all facts, opinions, and conclusions, and identify all documents and any other information which you have concerning warnings given to users of asbestos products by other manufacturers and suppliers of asbestos products, and identify any individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: Aside from the information supplied in Answers to Interrogatories Nos. 18 and 34, this Defendant objects to this Interrogatory because it is overly

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broad and on the ground that it calls for information not in the possession of this Defendant, but instead is in the possession of the entities referred to in this Interrogatory. It is not reasonable for this Defendant to be asked to provide, at great expense and under heavy burden, information available to Plaintiffs through those entities with personal knowledge of the information sought.

57. State all facts, opinions, and conclusions, and identify all documents and any other information which you have concerning protective devices which you recommended be used by persons working with or exposed to asbestos products and the actual use of such facts, opinions, conclusions and other information and identify the applicable documents.
ANSWER: See answer to Interrogatory No. 18 and No. 34.

58. State all facts, opinions, and conclusions, and identify all documents and any other information which you have concerning protective devices recommended by other manufacturers and suppliers of asbestos products and the

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actual use of such devices; identify any individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: See answer to Interrogatory No. 56.

59. If you content that there was no need or reason or that you did not have to give warnings of the risks and dangers of the use and exposure to asbestos products until the adoption of OSHA regulations, state all facts, opinions, and conclusions, and identify all documents and any other information which you assert supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: Not applicable to this Defendant.

60. If you content that there now exists or has at some point existed some relevant distinction between any one or more of the following: miners, millers, textile workers, asbestos plant workers, insulators, shipyard workers, steel plant workers and industrial workers with respect to exposure to asbestos products and health ramifications thereof, state all facts, opinions, and conclusions, and identify all

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documents and any other information which you contend support this position and identify the individuals who have knowledge of same.

ANSWER:

This Defendant objects to this Interrogatory on the ground that it is overly broad and not capable of meaningful response by way of Interrogatory answer. This Defendant will call at trial expert witness on the state of the art, whose testimony will address the subject matter of this Interrogatory. Their opinions can be probed at length at deposition.

61. Set forth in detail with regard to each and every sale, delivery or supplying of asbestos product to: (a) Bethlehem Steel Company; and (b) Bethlehem Steel Company Sparrows Point, Maryland facility or any predecessor thereof, the following:

a. The date of each such sale, delivery or supply;

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 product;

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f. The quantity of each such sale, delivery or supplying and the price paid by the employer, or its predecessor for the shipment;

g. The invoice and purchase order number of such shipments and the other information required to identify each such shipment;

h. The department and officer or employees of plaintiff's employer or its predecessor who:

1. Accepted the order;

2. Packaged the order;

3. Shipped the order;

4. Has possession at the present time of the records concerning such shipment;

j. Specify information as to which of the above sales, deliveries, or supplies was made directly to the premises of employer.

ANSWER: This Defendant did not sell its asbestos thermal insulation product to the parties listed in this interrogatory.

62. Has any officer, employee or representative of Defendant visited any one of the Bethlehem Steel Company's facilities including the Sparrows Point, Maryland facilities

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in the course of his employment for the purpose, among others, of promoting, selling, or discussing the use of your asbestos products or for the purpose, among others, of discussing, inspecting or reviewing the use of asbestos products or for the purpose of discussing, inspecting or reviewing the health and safety aspects of a workplace where asbestos products are used? If so, state:

a. The name, address and title of each employee who visited said plant;

b. The date of each visit;

c. The purpose of each visit;

d. Who at employer's plant he or she saw and spoke to on each occasion;

e. Whether such party or parties discusses the long term effects on health and safety of exposure to asbestos with management personnel, and, if so, state:

i. The content of such discussions;

ii. The dates of such discussions;

f. Whether such party or parties attempted to impart information respecting health and safety ramifications of long term asbestos exposure to employees particularly plaintiff herein, and if so, state:

i. The results of such efforts;

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ii. The content of the information sought to be imparted;

iii. The date of such efforts.

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, immaterial and is not calculated to lead to the discovery of admissible evidence.

63. Did Defendant ever attempt to apprise anyone of the health and safety effects of exposure to asbestos by written communications? If so, state:

a. The dates of such communications;

b. The name, address and job title of the party on behalf of Defendant that so communicated;

c. The name, address and job title of the party that first recommended same;

d. The means used by Defendant to transmit same;

e. The identity of the custodian of all such written communications.

f. The names of any person or entity that received such communications or to whom they were directed.

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ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, vague and ambiguous and is not calculated to lead to discovery of admissible evidence.

64. Does or has Defendant maintained a library or libraries, which, in any way, deal with asbestos, industrial hygiene, medicine, safety and/or engineering? If so, state:

a. The date Defendant established each such library;

b. The location of each such library;

c. The names and addresses of the librarians of each such library since 1925;

d. The title, author and publisher of all journals subscribed to or acquired by the Defendant concerning asbestos, industrial hygiene, medicine, safety and/or engineering, as well as the dates of subscriptions or acquisitions of each;

e. The title, author, publisher and date of publication of all books and articles which were or are in such library, dealing with asbestos and asbestos-related diseases and the date each was acquired;

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f. For whose use the library or libraries were established;

g. Who, in fact, uses the library or libraries;

h. Why, in each instance, the library was established.

ANSWER: No.

65. Has Defendant conducted or had conducted for it, or participated in any investigation, study, test, review or analysis (hereinafter referred to as "study"), concerning pneumoconiosis generally and/or asbestos-related diseases, illnesses or injuries and/or the safety aspects concerning the use of asbestos products:

If so, identify each such study by:

a. The date each study was commenced;

b. The date each study was concluded;

c. The name and address or the person, association, organization or agency authorizing the study;

d. The name, address and job title of the person in charge of the study;

e. The names, addresses and job titles of the persons participating in the study;

f. The title and subject of the study;

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g. The result of each study;

h. The statistical analysis made, stating the results and describing the date and assumptions upon which they were based;

i. If in writing, identify the present custodian of same;

ANSWER: See answer to Interrogatory No. 23.

66. If the Defendant or its proposed expert witnesses intend to rely upon or offer into evidence, any textbook, paper, authority or the like to substantiate any option or conclusions, or intend to rely upon same in its cross-examination of any experts set forth:

a. The exact title of each test upon which you intend to rely;

b. The name and address of the publisher of each such test;

c. The date published and the author of each;

d. The pages and sections upon which you intend to rely.

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ANSWER: This Defendant objects to this Interrogatory on the ground that is seeks information outside the scope of permissible discovery and infringes on attorney work product. The opinions of experts may be probed at deposition.

67. Does the Defendant have in its possession or have knowledge of any books, pamphlets, memoranda, correspondence, reports, studies, minutes of meetings, articles in newspapers, magazines, periodicals or journals, or written materials of any kind or character that would indicate that asbestos fibers when inhaled are or may be dangerous to the health of human beings? If so, please set forth each such document:

a. The identity of each such correspondence, publication,etc., document or written material;

b. The date each such document, memoranda, correspondence, or written material was published and the name of the publisher and author;

c. The date Defendant first acquired knowledge of each such document;

d. The date Defendant first acquired possession of each such documents;

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e. The name, job title and address of each person who currently has possession of such documents.

ANSWER: This Defendant objects to this interrogatory on the basis that it seeks information which is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence.

68. Has Defendant undertaken to investigate the occurrence alleged in plaintiff's complaint? If so, please state:

a. The name, address and job title of the persons participating in each such investigation;

b. List each written record pertaining to such investigation and its location and custodian;

c. any witnesses, and if so, list:

1. The name, address and job title of each such witness;

2. The name, address and job title of each person having custody of each such statement.

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ANSWER: This Defendant is not presently engaged in the manufacture of an asbestos thermal insulation product and is therefore not qualified to render an opinion on the question set forth in this interrogatory.

72. Has Defendant at any time required its employees who worked directly with asbestos to wear respirators, gas masks or other protective devices. If so, set forth which employees (by type and department) are required to wear protective devices, when the directive relative to same was issued for each type of employee, and which specific type of protective device was required to be worn by each type of employee.

ANSWER: Plaintiff was never employed by this Defendant and Defendant therefore objects to this interrogatory because it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence.

73. When initially employing an individual in non-management functions, does or did Defendnt inform each individual as to possible health ramifications of working with asbestos? If so, set forth:

a. The nature of the warning;

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b. How the warning was and is communicted;

c. If communicated in writing, attach a copy of same hereto;

d. When each such practice was initiated by Defendants;

e. By whom such warning was and is communicted;

f. If in writing, whether such warning was and is included in the transmittal of other papers and/or documents to the new employee.

ANSWER: Plaintiff was never employed by this Defendant and Defendant therefore objects to this interrogatory because it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence.

74. Did Defendant at any time make any efforts to ascertain the conditions under which their products containing asbestos were used at the Bethlehem Steel Sparrows Point, Maryland Steel Plant or at any steel production foundry facilities? If so, state:

a. When such efforts were made and identify the facilities involved;

b. What such efforts revealed;

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c. The individual and his or her job classifications that made such efforts;

d. What Defendant did as a result of obtaining such information.

ANSWER: This Defendant does not concede or have knowledge of evidence that its asbestos thermal insulation product was used at the locations named in this interrogatory.

75. Please identify all documents in your possession or control which you intend to introduce at trial for any purpose.

ANSWER: This Defendant objects to this Interrogatory as improper because it seeks information that cannot be produced until the end of discovery when Defendants have had an opportunity to discover the proof, if any, of Plaintiffs' case. This Defendant will supply the information requested, if necessary, at the time of the filing of the Pre-Trial Order.

76. State in detail all efforts and actions taken by you to provide the information requested in each of these interrogtories and in so doing identify each person you

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consulted, employed or interviewed for this purpose, each person who assisted you in seeking out the information requested, and identify all documents which you examined or reviewed for this purpose and identify the present custodian of same.

ANSWER: Defendant did not review documents or make inquiry specifically in connection with these sets of interrogtories. Pittsburgh Corning Corporation's answers to these interrogatories are based on information learned, assembled and reviewed over a number of years, in the course of business and in the course of litigating numerous claims throughout the country. It is not possible to designate the particular source for information used to respond to each specific interrogatory.

77. State in detail all efforts and actions taken by you to produce the documents and tangible things requested by the plaintiff and in so doing identify each person you consulted, employed or interviewed for this purpose, the location of all documents and things which you examined or reviewed and a

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description of the documents located thereat and identify each person who assisted you in seeking out the documents requested.

ANSWER: See Answer to Interrogatory No. 76.

78. Has any physician, industrial hygienist or medical consultant who was or is directly or indirectly employed by you or your predecessor in interest ever visited any office or facility of the Bethlehem Steel Company on the cause of his employment. If so:

a. The name, address and title of each employee who visited said plant;

b. The date of each visit;

c. the purpose of each visit;

d. Who at employer's plant he or she saw and spoke to on each occasion;

e. Whether such party or parties discussed the long term effects of health and safety of exposure to asbestos with management personnel, and, if so, state:

i. The content of such discussions;

ii. The dates of such discussions;

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f. Whether such party or parties attempted to impart information respecting health and safety ramifications of long term asbestos exposure to employees, particularly plaintiff herein, and of so, state:

i. the results of such efforts;

ii. The content of the information sought to be imparted.

iii. The date of such efforts.

ANSWER: No.

79. If you contend there are differences between asbestos fiber types (i.e., chrysotile, amosite and crocidolite) with respect to the diseases they appear to be capable of causing, state all facts, opinions and conclusions in this regard, identify all documents relating to same and all persons with knowledge of same.

ANSWER: This Defendant objects to this interrogatory on the ground it requires an expert medical opinion which this Defendant is unable to render.

80. Identify all past and present officers, agents, servants, employees, representatives, consultants or independent contractors of yours who have testified or been

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deposed in connection with any claim or lawsuit for abestos-related disease and in so doing give a brief summary of the subject matter about which said person testified.

ANSWER: This Defendant objects to this Interrogatory on the ground that it is overly broad, unduly burdensome, and seeks information outside the scope of permissible discovery, protected by attorney-client privilege and the attorney work product doctrine. This Interrogatory has no value other than to harass and burden the Defendant.

81. As to each of the following studies, articles, reports, surveys, etc., state as to each:

A. When you first acquired awareness or knowledge of its existence;

B. When you first acquired a copy of each respectively;

C. When you read or reviewed each respectively or otherwise were informed of the contents.

1. Report of Kenneth Smith to March 7, 1956 meeting of Asbestos Textile Institute Air Hygiene Committee;

2. Report of Frost, et al. - in abstract in the Industrial Hygiene Digest;

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3. Report of Irving Selilcoff in June 1963 to the AMA meeting;

4. F. L. Hoffman's - Mortality From Respiratory Diseases In Dusty Trades (Inorganic Dusts), U. S. Bur. Lab. Stats. Bull, 231, 1918;

5. H. K. Pancoast, T. G. Miller & H.R.M. Landis - Roentgenologic Study Of The Effects Of Dust Inhalation Upon The Lungs, Am. J. Roent. 1918;

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10. Albert E. Russell - Case Report Of Asbestos Worker Developing Asbestos, 1932;

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13. Report by Lynch, et al. - Am. Rev. Tuber. - 1931, on asbestos;

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15. Wood and Gloyne - Pulm. Asbestosis Complicated by Pulm. T.B., 1931

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21. W. C. Dressen, et al. - A Study Of Asbestosis In The Asb. Tex. Ind., U.S.P.H.S. Bull No. 241.

22. Dressen and Sayers - Asbestosis, Am. J. Pub Hlth., 1939;

23. Fleischer and Drinker - Study Of Shipyard Wkrs., J. of Ind. Hyg. and Toxicology (1946);

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24. Breslow - Lung Cancer Among Insulators, Am. J. of Pub. Hlth, Feb. 1954;

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27. Hueper - Bull. of Am. Society for the Control of Cancer, Vol. 25, #6 (1943);

28. G. Conklin, Cancer and Environment, 180 Sci. Am. p. 11 (1949);

29. Kenneth Smith - Johns-Manville Survey of Asbestos;

30. Breslow - Survey of Asbestos Workers, Am. J. of Pub. Hlth., Vol. 44 (1954);

31. William Hueper - U.S. Dept of Pub. Hlth, Monogram #36 (1955), cites asbestos as a carcinogen;

32. Schepers, Oc. Chest Diseases, ch. 38 of Modern Oc. Med. (Flemong, D'Alonzo and Zapp), 1962;

ANSWER: This Defendant objects to this interrogatory on the basis that it is overly broad, irrelevant, burdensome and not calculated to lead to the discovery of admissable evidence. Without waiving this objection, see answer to Interrogatory No. 45.

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82. If you contend that you had no reason or duty to warn the plaintiff or plaintiff's employer about the risks or dangers of the use of and exposure to asbestos products until sometime after 1964, state all facts, opinions, conclusions and identify all documents and any other information upon which you rely, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: See Answers to Interrogatories Nos. 6, 18, 41, 43 and 60.

83. If you contend that you gave adequate warnings of the risks and dangers of the use and exposure to asbestos products to the users of your asbestos products including the plaintiff, state all facts, opinions, conclusions and identify all documents and any other information which you contend supports this assertion and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

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84. If you contend you gave adequate warnings of the rists and dangers of the use of and exposure to asbestos products to the plaintiff's employer, state all facts, opinions, conclusions and identify all documents and any other information which you contend supports this assertion, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

85. If you contend that you recommended proper and adequate safety procedures to the plaintiffs or to the plaintiff's employer regarding the use of and exposure to asbestos products, state all facts, opinions, conclusions and identify all documents and other informtion which you contend supports this assertion and identify the individuals who have knowledge of such facts, opinions, and conclusions, and other information and identity the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

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86. If you contend that the plaintiff was exposed, if at all, to a safe amount of asbestos or to less than the "threshold limit" of exposure to asbestos dust and fibers resulting from your asbestos products, state all facts, opinions, conclusions and identify all documents and any other information which you contend supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

87. If you contend that the plaintiff's disabilities or injuries are not related to exposure to asbestos products, state all facts, opinions and conclusions, and identify all documents which you assert support this position and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

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88. If you contend that the plaintiff's disabilities or injuries are related to something other than the use of and exposure to asbestos products, state all facts, opinions and conclusions, and identify all documents and any other information which you contend support this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

89. If you contend that the plaintiff's injuries are related in whole or in part to cigarette smoking, state all facts, opinions and conclusions, and identify all documents and any other information which you contend support this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

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90. If you contend that the plaintiff's disabilities or injuries are due to some act of the plaintiff's employer, state all facts, opinions and conclusions, and identify all documents and any other information which you contend support this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

91. If you contend that the plaintiff did not work with and was not exposed to any asbestos products mined, manufactured or supplied by you, state all facts, opinions, and conclusions, and identify all documents and any other information which you contend supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

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92. If you contend that the asbestos products which the plaintiff used and/or was exposed to were not under your exclusive control , state all facts, opinions and conclusions, and identify all documents and any other information which you contend supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

93. If you content there were changes made to your abestos products after they left your control, state all facts, opinions and conclusions, and identify all documents and any other information which you assert supports this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

94. State all facts, opinions and conclusions, and identify all documents and any other information which you contend supports your allegation that plaintiff's claims are

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barred by the Statute of Limitations; identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

95. State all facts, opinions and conclusions, and identify all documents and any other information which you contend supports your allegation that the plaintiff's claims are barred by his assumption of the risk of injury while working with asbestos products; identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

96. If you contend the plaintiff's claim is barred by his contributory negligence while working with asbestos products, state all facts, opinions, and conclusions, and identify all documents and any other information which you content support this position, and identify the individuals who have knowledge of such facts, opinions, conclusions and other information, and identify the applicable documents.

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ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

97. If you assert that the plaintiff's claim is barred by his misuse of the asbestos products with which he worked, state all facts, opinions and conclusions, and identify all documents and any other information which you contend supports this position, and identify the individuals who have knowledge of such facts, opinions, and conclusions and other information, and identify the applicable documents.

ANSWER: This information will be supplied in answers to Plaintiffs Interrogatories.

BY _____
M. Bradley Hallwig, Esq.
Attorney for Defendant
Pittsburgh Corning Corporation

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A F F I D A V I T

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

BEFORE ME, the undersigned authority in and for said Commonwealth and County, personally appeared ROBERT E. BUCKLEY, who being duly sworn, deposes and says that he is the former Vice President and Assistant to the President of Pittsburgh Corning Corporation, that he is currently a Consultant to the Company, that he is authorized to make this affidavit on its behalf, and that the facts contained in the foregoing Answers to Interrogatories are true and correct to the best of his knowledge or information and belief.

ROBERT E. BUCKLEY

SWORN TO and subscribed before me

this 6th day of June, 1984.

Notary Public

GENE H. RENZIEHAUSEN, Notary Public
Fox Borough, Allegheny County, PA
Commission Expires August 8, 1985

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