Johns-Manville

Internal Correspondence

To: Kip Johnson 2-03

Date: December 6, 1976

From: R. H. Feeney

Copies: File

Subject: INDUSTRIAL PRODUCTS ADVERTISING

1. During the last six years two advertising managers have been concerned directly with Industrial insulation advertising and promotion: Hal Hastings, no longer with J-M; and Larry Hall, currently Senior Advertising Manager, Industrial Divisions, located here at WHQ.

2. From the mid-1950's until 1970, the advertising agency was Cunningham & Walsh, Inc., 260 Madison Avenue, New York, N. Y. During 1970 and 1971 the agency was Warner, Bicking & Fenwick, 866 United Nations Plaza, New York, N. Y. During 1972 and 1973, the agency was Campbell-Mithun, 200 Fillmore, Denver, Colorado. Since the Fall, 1973, all industrial advertising has been handled by Broyles, Allebaugh & Davis, Inc., 31 Denver Technological Center, Englewood, Colorado.

3. Attached are media schedules for the Industrial Products Division advertising.

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J-M 83

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0001 0068

F. A. BASSHAN INTERROGATORY
QUESTION #31

Attached are copies of literature on our products listed in Question 3. Our Advertising Department has supplied copies of said literature as far back as their files go.

The dates published appear on the bottom of each piece of literature. Some of the older ones also show the date cancelled.

Literature is normally distributed to Architects, Engineers, Contractors, Distributors or any potential user making an inquiry about our products.

Up-to-date literature is available at each district office and DHQ.

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J-M 83

0001 0069

1/8/71 O

SD

Sales Literature on Asbestos Insulations

IN-134A Superex Block Insulation (renumbered IN-190A 11/58) 2/51
IN-143A 85% Magnesia Insulation 4/54, 5/58, 6/59
IN-154A Insulkote Protective Coatings 1/55, 12/56, 6/59
IN-169A Thermobestos Pipe and Block Insulation 12/55, 5/57, 5/58, 5/59, 11/60, 5/67
IN-173A Asbestocite Sheets 3/56, 6/57, 7/59, 10/61
IN-184A Transite Sheets 9/57, 5/58, 6/59, 10/61
IN-190A Superex Pipe and Block Insulation 11/58, 10/59, 11/68
IN-268A Thermobestos Pipe and Block Insulation 12/59, 11/69, 3/68
IN-269A 85% Magnesia Insulation 12/59, 10/61
IN-270A Superex Block Insulation 12/59, 7/66
IN-271A Superex-M Pipe and Block Insulation 12/59, 2/68, 8/69, 11/69
IN-272A Asbestocite Sheets 12/59
IN-284A Asbestos Millboard Sheets 12/59, 9/67, 6/68
IN-287A Cements & Fills 1/60, 10/67, 6/68, 1/70
IN-288A Weatherproofing Jackets 1/60, 2/69, 5/69
IN-292A Insulkote Protective Coatings 1960, 10/61, 1/70
IN-309A Asbestos Paper and Rollboard 4/60, 5/69
IN-312A Miscellaneous Insulations 5/60, 11/66, 12/69
IN-375A Thermobestos Extended Legs 1/67, 1/70
IN-599A Thermobestos for Low Temperatures 7/68
IN-811A Superex SG Block Insulation 6/69
IN-816A Thermobestos LD Molded Elbow 5/69

ALSO:

IN-60A Insulating and Finishing Cements 5/52
IN-450 J-M Insulating Cements Data Sheet (Xerox)
IN-62A 85% Magnesia 4/52, 8/49
IN-93A Low Pressure Insulations Blotter 5/49
IN-61A Asbestocel Insulation 4/52
IN-63A Pre-shrunk Asbestocel Pipe Covering 12/49
IN-82A J-M Pipe Insulations 3/49
IN-50 Fire-Felt Sheets and Blocks Data Sheet (Xerox)
IN-53 Asbestocel Sheets and Blocks, Flexible Roll, Cellamite Sheets and Blocks, Hair Felt (Xerox) Data Sheet
IN-160 Asbestocel Jackets for Range Boilers (Xerox) Data Sheet
IN-260 Pre-Shrunk Asbestocel Pipe Insulation (Xerox) Data Sheet
IN-115 Asbestos Millboard Data Sheet (Xerox) Also Asbestos Roll Fire-Felt, Ceilinite

Handling instructions from No. 500 Insulating Cement bag (Xerox)
Handling instructions from No. 678 Semi Refractory Cement bag (Xerox)
Handling instructions from "S" Asbestoment bag (Xerox)
Handling instructions from No. 301 Cement bag (Xerox)
~~Handling instructions from J-Spray bag (Xerox)~~ Not J-M Manufactured

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MOVIES, i.e. ASBESTOS

"Fibers of Freedom"
* "Asbestos - A Matter of Time"
* "Asbestos - The Indispensable Mineral"
"Working with Asbestos"
"Underground Arteries"
* "The Bright Approach to Heat Control"
* "100 Years of Roofing Experience"
* "The Inside Story"
"AC Pipe & Health"
"Heat, the Science and Economics of its Control"
"Safer Ships"
"Quick and Easy" (a/k/a/ "Metal-On")
"The Mask of Life"
"No Smoking, Please"
"Modern Paving Techniques with Asbestos and Asphalt Mixes"
"Take it Away"
"Guardians of Communications"
"Exit Ground Water"
"Irrigation and the Business of Farming"
"Pipelines to Health"
"Asbestos Fiber Water Drainage"
"Asbestos Flexboard: The All-Mineral Building Material of 1,000 Uses"
"Asbestos Paving"
"Colorbestos"
"Johns-Manville Asbestos Flexboard"
"Kennecott Counts on Transite Again"
"Story of Irrigation and Transite Pipe"

This listing was produced in Speake, Bob with the exception of those marked with an *

10/5/81

cgp

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J-M 83

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J-M 83

During the last six years, advertising managers that have been concerned directly with Industrial Insulation advertising and promotion are Hal Hastings, no longer with Johns-Manville, and Larry Hall, currently Senior Advertising Manager, Industrial Divisions, Johns-Manville Corporation, P. O. Box 5723, Denver, Colorado 80217. From the mid-1950's until 1970, the advertising agency used was Cunningham & Walsh, Inc., 260 Madison Avenue, New York, NY. During 1970 and 1971, the agency was Warner, Bicking & Fenwick, 866 United Nations Plaza, New York, NY. During 1972 and 1973, the agency was Campbell-Mithun, 200 Fillmore, Denver, Colorado. Since the Fall of 1973, all industrial advertising has been handled by Broyles, Allebaugh & Davis, Inc., 31 Denver Technological Center, Englewood, Colorado.

See Exhibit K attached hereto. Advertising records encompassing the period of time preceding that set forth in Exhibit K are no longer in existence, the same having been destroyed in the regular course of business and due to a change in corporate advertising agencies.

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asbestosclaims.law/library/24517/6

same;

b. The name, address and job title of each person who presently has possession of same;

c. The date same was prepared;

d. The media used to disseminate the sales material.

ANSWER: During the last six years two advertising managers have been concerned directly with Industrial Insulation advertising and promotion: Hal Hastings, no longer with Johns-Manville; and, Larry Hall, currently Senior Advertising Manager, Industrial Divisions, Johns-Manville Corporation, P.O. Box 5723, Denver, Colorado 80217. From the mid-1950's until 1970, the advertising agency was Cunningham & Walsh, Inc., 260 Madison Ave., New York, NY. During 1970 and 1971 the agency was Warner, Bicking & Fenwick, 866 United Nations Plaza, New York, NY. During 1972 and 1973, the agency was Campbell-Mithun, 200 Fillmore, Denver, Colorado. Since the Fall, 1973, all industrial advertising has been handled by Broyles, Allebaugh & Davis, Inc., 31 Denver Technological Center, Englewood, Colorado.

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J-M 83

b. See answer to Interrogatory 44a., above.

c. Sales material was prepared on a continual basis during the period Defendants manufactured and marketed the products identified in Exhibit D.

d. Magazines, trade publications, catalogs, trade shows and sales staff.

See Exhibit ___ attached hereto. Advertising records encompassing the period of time preceding that set forth in Exhibit ___ are no longer in existence, the same having been destroyed in the regular course of business and due to a change in corporate advertising agencies.

A31708

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NOTE: Attached are notes made by Helen Marsh re: possible depositions of advertising people.

TT Stearn 1-27-87

At c+w Friday afternoon - some doc. produced by NYC office
Has gone thru 30% of it - nothing of significance -

Glasser was in town on Friday + looked thru some of it -
saw 50-75 docs -
wants to go thru in more detailed fashion

Stearn wants to arrange for Glasser + me to go thru it all at once -

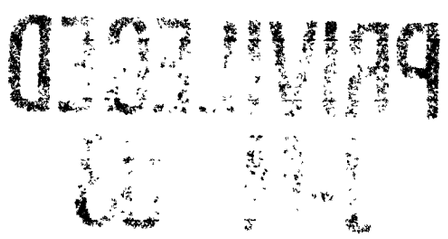
Reposition: Carl Nichols Feb 24
tentative date

Glasser - interested in ltr written by someone from J-M in 1972 saying that J-M is aware of impending ~~legislation~~ requirement to include warning labels -

Probably about 2 file drawers plus some print ad books - that are 30-40 yrs old -
Maybe more -
Some stuff coming in from San Francisco -

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Johns-Manville

[redacted]

212 935-5533

From

To: 1-14-81

TF Stearns

Location:

Date:

Subject:

J-M client of ctwfrm 1954-72 - may be before 1954 but there was a break in service - no one recalls insurance

#8750

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J-M 83

10.5 2500.00

262.50

2850.

2762.50

350.00

1. only person familiar is Carl Nichols

2. six people who dealt w/ J-M but no longer employed

1 Jack Skinberg

2 Wm "Mac" Walker

3 Norm Carry

4 Whitaker Franzheim

5. Art Buckley

6. Tom Fielder

No one knows where these people are

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Johns-Manville

JM Memo

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J-M 83

To:

From:

Location:

Date:

Subject:

All records predating 1973 have been destroyed - but memo will be circulated to see if any docs exist.

Those docs will be forwarded by Jan. 23,

will Reschedule for Feb 23 or so -

Nichols believes asb. line of products were directed to use by government -

No discussion re warnings -

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JM Memo

JM-594

From: A. Christen

To: Advertising file Location:

Date: 12/2/80

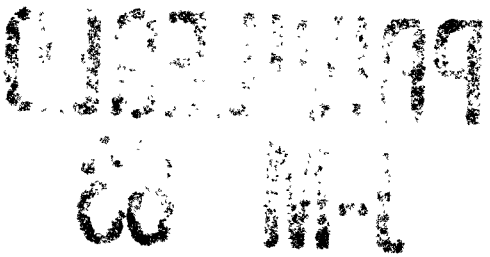
Subject: Advertising records

Per. Madelaine Cassidy in Advertising, J-M generally advertises on a national basis, not on a state by state basis. Possible exception might have been co-op advertising on a local basis. She said she felt sure that advertising naturally has been the procedure over the years. (No records available on a state-by-state basis). Use our general

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Johns-Manville

JM Memo

From:

To: Mr. Skern

Location: C+W Lobby

Date:

Subject:

Carl Michols - will be out of town on 21st -

Must docs prior to 1973 have been destroyed -

He is circulating memo to all employees -

Stephen R Skern
400 Madison Ave
Suite 1708
NYC 10017
(Law Office of Harvey B Sindle)
212-935-5533

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83

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Johns-Manville

JM Memo

[redacted]

[redacted]

Location:

Date:

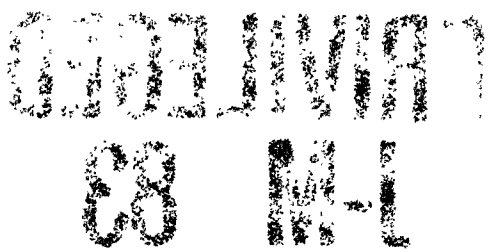
[redacted]

Glasser wants to speak w/ Nichols prior to deposition — Stern reserved judgment —

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JM--594-A

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A3 1916

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Bill Gibbon
Bob Knapp

retired J-M
employees
(Advertising)
2392

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LAW OFFICES OF
SEAWELL, McCOY, DALTON, HUGHES, GORE & TIMMS
936 WAINWRIGHT BUILDING
BUTE & DUKE STREETS
NORFOLK, VIRGINIA 23510

HARRY E. McCOY
CHARLES R. DALTON, JR.
ROBERT M. HUGHES III
A. JACKSON TIMMS
JOHN R. CRUMPLER, JR.
FREDERICK W. BECK III
C. MICHAEL MONTGOMERY
JOEL A. KOLODNY
PHILIP N. DAVEY
THOMAS A. RUCKER
GEORGE M. KELLEY III
MICHAEL F. LEBAN

STEPHEN WAINGER
MALCOLM B. HIGGINS II
GLEN A. HUFF
WILLIAM L. PECK
H. KEITH JARVIS
STEVEN G. SCHWARTZ
RICHARD T. ROBOL
DOUGLAS B. WESSEL
DAVID N. REDA

LEON T. SEAWELL
OF COUNSEL

VIRGIL S. GORE, JR.
1926-1977

P. O. BOX 936
NORFOLK, VIRGINIA 23501

TELEPHONE (804) 622-5341
CABLE: SEAWELL

TELEX: 825455

January 6, 1981

Re: Virginia Asbestos Litigation

Ms. Helen Marsh
Johns-Manville Corporation
Ken-Caryl Ranch
Denver, CO 80217

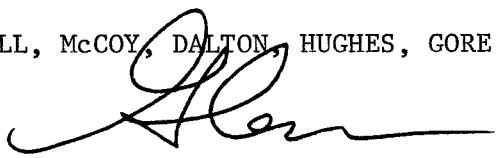
Dear Helen:

Per our telephone conversation of this date, enclosed herewith please find a copy of plaintiffs' Notice to Take Depositions in the above-referenced litigation. An attempt was made to have the depositions of Johns-Manville's advertising consultants postponed from the previously noticed dates of January 21 and 22, 1981. Bob Hatten refused to agree to same. In the event that a pre-deposition meeting is arranged with representatives of the two advertising agencies, we would appreciate being apprised of same or included in the meeting.

With kind regards, we remain

Very truly yours,

SEAWELL, McCOY, DALTON, HUGHES, GORE & TIMMS

By: 

Glen A. Huff

GAH/jls
Enclosure

cc: Mr. David McKnight
Mr. Lively M. Wilson
Mr. Dennis H. Markusson

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK AND NEWPORT NEWS DIVISIONS

IN RE: ASBESTOS CASES C. P. No. 77-1

NOTICE TO TAKE DEPOSITIONS

TAKE NOTICE that on the dates and times and at the locations shown below, or as soon thereafter as possible, the undersigned shall proceed to take the depositions of the below-listed persons, upon oral examination before a Court Reporter and Notary Republic. If, for any reason, the taking of any of said depositions be not commenced, or if commenced, be not concluded, then the taking thereof will be adjourned from day to day and from time to time until the same shall be completed:

WEDNESDAY, JANUARY 21, 1981, commencing at 9:30 a.m. in New York, New York, at a place to be hereafter designated, the most knowledgeable person(s) at Cunningham and Walsh, Inc., concerning the advertising accounts of Johns-Manville Corporation, Johns-Manville Sales Corporation, Johns-Manville Products Corporation, Canadian Johns-Manville Co., Ltd., Canadian Johns-Manville Mining Co., Ltd., and Canadian Johns-Manville Asbestos, Ltd., pertaining to asbestos-containing industrial products, including, but not limited to, the asbestos-containing insulation blocks, asbestos-containing insulation sections, asbestos-containing cements, asbestos-containing millboard, asbestos-containing cloth and textile products, asbestos-containing gaskets and asbestos-containing brake and friction materials.

This person shall bring with him the items listed in the attached Exhibit "A".

THURSDAY, JANUARY 22, 1981, commencing at 9:30 a.m. in New York, New York, at a place to be hereafter designated, the most knowledgeable person(s) at Warner, Bicking and Fenwick concerning the advertising accounts of Johns-Manville Corporation, Johns-Manville Sales Corporation, Johns-Manville Products Corporation, Canadian Johns-Manville Co., Ltd., Canadian Johns-Manville Mining Co., Ltd., and Canadian Johns-Manville Asbestos, Ltd., pertaining to asbestos-containing industrial products, including, but not limited to, the asbestos-containing insulation blocks, asbestos-containing insulation sections, asbestos-containing cements, asbestos-

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GLASSER AND GLASSER
ATTORNEYS AT LAW
504 PLAZA ONE
NORFOLK, VIRGINIA 23510

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containing millboard, asbestos containing cloth and textile products, asbestos-containing gaskets and asbestos-containing brake and friction materials.

This person shall bring with him the items listed in the attached Exhibit "A".

FRIDAY, JANUARY 23, 1981, commencing at 10:00 a.m.: Thomas Bodnarchuk, said deposition to be held at the offices of Budd, Larner, Kent, Gross, Picillo and Rosenbaum, 33 Washington Street, Newark, New Jersey. Mr. Bodnarchuk shall bring with him the documents heretofore produced and/or identified in his previous deposition on Thursday, December 4, 1980.

MONDAY, JANUARY 26, 1981, commencing at 9:30 a.m. at the law offices of Patten and Wornom, 14749 Warwick Boulevard, Newport News, Virginia, the most knowledgeable person(s) at Newport News Shipbuilding and Dry Dock Company, Newport News, Virginia, concerning the manufacture, supply, installation and/or use of asbestos-containing pipehangers in the construction of the U.S.S. Eisenhower and U.S.S. Vinson.

MONDAY, JANUARY 26, 1981, commencing at 10:00 a.m. and to appear consecutively thereafter at the Radisson Hotel in Charlotte, North Carolina:

1. The most knowledgeable person(s) (to be designated by Southern Textile Company, f/k/a Southern Asbestos Company) in recognizing and/or identifying the asbestos-containing products manufactured and/or distributed by Southern Textile Company, f/k/a Southern Asbestos Company, including, but not limited to, the following asbestos-containing products:

a. asbestos-containing cloth (plain)
b. asbestos-containing cloth (with blue stripe)
c. asbestos-containing cloth (with red stripe)
d. asbestos-containing cloth (with green stripe)
e. asbestos-containing Portersite
f. asbestos-containing Porterlag
g. Amosite
h. asbestos-containing Flamegard (yellow)
i. asbestos-containing Flamegard (green)
j. asbestos-containing Flamegard (blue)
k. asbestos-containing tape
l. asbestos-containing yarn
m. asbestos-containing cord
n. asbestos-containing rope

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2. The most knowledgeable person(s) (to be designated by H. K. Porter Co., Inc.) in recognizing and/or identifying the asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., including, but not limited to, the following asbestos-containing products:

LASSER AND GLASSER
ATTORNEYS AT LAW
504 PLAZA ONE
NORFOLK, VIRGINIA 23510

a. asbestos-containing cloth (plain)
b. asbestos-containing cloth (with blue stripe)
c. asbestos-containing cloth (with red stripe)
d. asbestos-containing cloth (with green stripe)
e. asbestos-containing Portersite
f. asbestos-containing Porterlag
g. Amosite
h. asbestos-containing Flamegard (yellow)
i. asbestos-containing Flamegard (green)
j. asbestos-containing Flamegard (blue)
k. asbestos-containing tape
l. asbestos-containing yarn
m. asbestos-containing cord
n. asbestos-containing rope

3. The most knowledgeable person(s) (to be designated by Southern Textile Company, f/k/a Southern Asbestos Company) in distinguishing the asbestos-containing products manufactured and/or distributed by Southern Textile Company, f/k/a Southern Asbestos Company, from the asbestos-containing products manufactured and/or distributed by manufacturers or distributors other than Southern Textile Company, f/k/a Southern Asbestos Company.

4. The most knowledgeable person(s) (to be designated by H. K. Porter Co., Inc.) in distinguishing the asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., from the asbestos-containing products manufactured and/or distributed by manufacturers or distributors other than H. K. Porter Company, Inc.

5. The most knowledgeable person(s) (to be designated by Southern Textile Company, f/k/a Southern Asbestos Company) concerning the labeling and/or marking and/or tagging of asbestos-containing products manufactured and/or distributed by Southern Textile Company, f/k/a Southern Asbestos Company, which said labels, markings or tags identified Southern Textile Company, or its predecessor, Southern Asbestos Company, or other predecessors, as the manufacturer or distributor of said asbestos-containing products.

6. The most knowledgeable person(s) (to be designated by H. K. Porter Co., Inc.) concerning the labeling and/or marking and/or tagging of asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., which said labels, markings or tags identified H. K. Porter Company, Inc., as the manufacturer or distributor of said asbestos-containing products.

The persons identified in paragraphs 1, 3 and 5 shall bring with him the items listed in the attached Exhibit "B".

The persons identified in paragraphs 2, 4 and 6 shall bring with him the items listed in the attached Exhibit "C".

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LASSER AND GLASSER
ATTORNEYS AT LAW
504 PLAZA ONE
NORFOLK, VIRGINIA 23510

Johns-Manville Legal Department File on Its Industrial Advertising Managers and Agencies (1976–1985)
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Subpoena duces tecum will be served on these persons designating that the items listed on the appropriate attached exhibit are to be brought to the above-designated depositions.

Respectfully submitted,

By: _____
Of Counsel

Richard S. Glasser
Ronald F. Schmidt
Glasser and Glasser
Suite 504 - Plaza One
Norfolk, Virginia 23510

Robert R. Hatten
Patten & Wornom
14749 Warwick Boulevard
Newport News, Virginia 23607

Gene Locks
1500 Walnut Street
Philadelphia, Pennsylvania 19102

CERTIFICATION

I hereby certify that a true copy of the foregoing pleading was mailed or hand-delivered to all counsel of record this 31st day of December, 1980.

_____
Richard S. Glasser

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J-M 83

GLASSER AND GLASSER
ATTORNEYS AT LAW
504 PLAZA ONE
NORFOLK, VIRGINIA 23510

Johns-Manville Legal Department File on Its Industrial Advertising Managers and Agencies (1976–1985)
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MINUTES OF 12/23/30

INDICATE ~~XN~~ A CHANGE IN
ADVERTISING AGENCIES FROM

W. L. BRANN, INC. TO

J. WALTER THOMPSON CO.

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A 21904

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EXHIBIT "A"

DEFINITIONS:

As used herein, "document" means any writing in the form of letter, memorandum, note or other type or form of correspondence, report, paper, notes of meetings or conversations, drafts, records, invoices, bills, ledgers, advertising materials, brochures, pamphlets, inserts, notices, circulars, etc., whether they be originals or copies thereof.

1. All documents relating to the advertising account(s) of any of the following entities: Johns-Manville Corporation, Johns-Manville Sales Corporation, Johns-Manville Products Corporation, Canadian Johns-Manville Co., Ltd., Canadian Johns-Manville Mining Co., Ltd., Canadian Johns-Manville Asbestos, Ltd. (hereinafter collectively referred to as "Johns-Manville entities").

2. All documents from any of the Johns-Manville entities to your company.

3. All documents from your company to any of the Johns-Manville entities.

4. All bills, invoices, ledgers and/or other documents reflecting the cost of and/or payment for the services and/or work performed by your company for any of the Johns-Manville entities.

5. All advertising materials created and/or distributed for or on behalf of any of the Johns-Manville entities.

6. All documents reflecting the number of each of the advertising materials referred to in Number 5 above which were ordered by any of the Johns-Manville entities and the date(s) and amount(s) of any such orders.

7. A copy of all mailing list(s) reflecting the names and addresses of all addressees to whom each of the advertising materials was mailed on behalf of any of the Johns-Manville entities.

8. All documents requesting or forwarding any data, information or materials for the advertising accounts of any of the Johns-Manville entities.

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EXHIBIT "B"

1. Samples of the asbestos-containing products manufactured and/or distributed by Southern Textile Company, formerly known as Southern Asbestos Company, from 1940 to date, including, but not limited to, ASBESTOS-CONTAINING CLOTH (PLAIN), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlage, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

2. Photographs of the asbestos-containing products manufactured and/or distributed by Southern Textile Company, formerly known as Southern Asbestos Company, from 1940 to date, including, but not limited to, ASBESTOS-CONTAINING CLOTH (PLAIN), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlage, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

3. Advertising brochures, promotional literature and any other materials depicting the asbestos containing products, and/or the usage of said asbestos-containing products, manufactured and/or distributed by Southern Textile Company, formerly known as Southern Asbestos Company, from 1940 to date, including, but not limited to, ASBESTOS-CONTAINING CLOTH (PLAIN), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlage, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

4. Specifications for the manufacture of the asbestos-containing products manufactured and/or distributed by Southern Textile Company, formerly known as Southern Asbestos Company, from 1940 to date, including, but not limited to, ASBESTOS-CONTAINING CLOTH (PLAIN), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlage, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

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EXHIBIT "C"

1. Samples of the asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., from 1940 to date, including, but not limited to, asbestos-containing cloth (plain), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlage, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

2. Photographs of the asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., from 1940 to date, including, but not limited to, asbestos-containing cloth (plain), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlag, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

3. Advertising brochures, promotional literature and any other materials depicting the asbestos containing products, and/or the usage of said asbestos-containing products, manufactured and/or distributed by H. K. Porter Company, Inc., from 1940 to date, including, but not limited to, asbestos-containing cloth (plain), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlag, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

4. Specifications for the manufacture of the asbestos-containing products manufactured and/or distributed by H. K. Porter Company, Inc., from 1940 to date, including, but not limited to, asbestos-containing cloth (plain), asbestos-containing cloth (with blue stripe), asbestos-containing cloth (with red stripe), asbestos-containing cloth (with green stripe), asbestos-containing Portersite, asbestos-containing Porterlag, amosite, asbestos-containing Flamegard (yellow), asbestos-containing tape, asbestos-containing yarn, asbestos-containing cord and asbestos-containing rope.

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C+W - terminated when we moved out from NYC 1971 as to advertising

212-683-4900

1976 ~~dit~~ product publicity — now chrm of BD Karl Nichols
10 yrs - all divisions currently - President Anthony Ching

across bd - all products - Nichols was in charge of the account
Nichols has no love for ~~DCA~~ Attridge

WB+F - only used for a yr or two 1968-1970
only for a few products - one division

212-759-7900 person who Phil Gisser (did most of work for J-M - no longer with the

806 UN Plaza 10017
~~Bill~~ Mr Warner or Mr Bichay

Product pub - getting stories out - news releases - free space

Advertising -

Jack Solan would know
~~Lyman~~

Bill Gibbons - now retired head, advertising
Bob Knapp - " "

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Mr. Warner 1-8-81

Only person still on staff at WB+F who was involved with J-M recall is Mr. Warner

June 17 - Feb. 1 out of the country
Has limited material - most of it thrown away -

Wants to get date postponed until Feb.

Otherwise business partner would substitute -

leaving office - will be back until Monday
Should know about status of docs. by 1-14 or 15 -

Mr ~~Neidorf~~ Chevins 1-8-81

Karen Miller - Director of Legal Services at C+W

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J-M 83

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Manville Internal Correspondence

To Nancy Stead

Date April 10, 1985

From Erika Powers

Copies File/Chrono

Subject Interrogatory No. 109, 110, 111
United States 4th Set of Interrogatories

109. Produce all advertisements, brochures, sales literature, promotional material, or any other printed material inserted in packages of Thermobestos pipecovering and block insulation manufactured for commercial availability for the period 1950 through 1980.

110. Produce all advertisements, brochures, sales literature, promotional material, or any other printed material inserted in packages of Thermobestos pipecovering and block insulation allegedly manufactured to comply with Navy specifications MIL-I-2781 and MIL-I-2819 and amendments for the period 1950 through 1980.

111. Produce all sales literature, promotional material, catalogs, or other listings or printed matter about Johns-Manville products used for promotional purposed that distinguish commercially available Thermobestos pipecovering and block insulation products from Thermobestos pipecovering and block insulation products allegedly manufactured "for Navy use" for the period 1950 through 1980.

We produced all advertisements, brochures, sales literature, promotional material on Thermobestos as follows:

	Production Box
Thermosbestos-General	AS-77
Thermosbestos-Product Literature	AS-77
Thermo 12	AS-77

Note: This box was reviewed by Mr. Schloman on 7/2/84, by Ms. Zitta on 7/6/84, and 7/9/84; filmed on 7/9/84 (copies of logs attached).

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	Production Box
Thermosbestos	AS-74

Note: This box was reviewed by Mr. Striggles on 7/3/84 and by Mr. Schloman on 7/6/84; filmed on 7/9/84 (copies of log attached).

Metal-on	AS-73

Note: This box was reviewed by Ms. Zegers on 7/3/84 and by Mr. Vider on 7/6/84; filmed 7/9/84.

Thermo-12	CIC-70

Note: This box was reviewed by Ms. O'Neil on 7/5/84 and by Mr. Vider on 7/6/84. Nothing was requested from this box.

Thermo-12 and Metal-on	CIC-71

Note: This box was reviewed by Ms. Papazian on 7/5/84 and by Mr. Vider on 7/6/84. Marinite literature was requested from this box.

Thermo-12 and Metal-on	CIC-74

Note: This box was reviewed by Mr. Holloway on 7/5/84 and by Mr. Vider on 7/6/84. Nothing was requested from this box.

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1/9/84

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

REQUESTOR	CARTON NO.	FILE DESCRIPTION	NUMBER OF PAGES
RAS	AS-77	Sealing Cmpounds	5
RAS	AS-77	Silicia	6.
RAS	AS-77	Sales Brochure	26
RAS	AS-77	Home Insul	18
RAS	AS-77	Supiver.	13
RAS	AS-77	Supiver M.	9
RAS	AS-77	Spiver.	44
RAS	AS-77	Supiver SC	3
~~RAS~~	~~AS-77~~	~~Supi~~	~~8~~
RAS	AS-77	Thermo IV	26
RAS	AS-77	product mf.	10
RAS	[redacted]	Therm[redacted]	150
RAS	[redacted]	Therm[redacted] Extended Leg	8
RAS	[redacted]	Thermobeads	27
			345
		TOC	

345

(1)

OVERNMENT
PRODUCTION LOG

INITIALS	DATE
LAB.	7/2/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AS 53	IRA	Painter	8:15	11:05
AS 67	"	Schloman	8:15	8:40
AS 81	"	Bastein	8:15	2:30
AS 61	"	Zegers	8:15	11:00
AS 89	"	Thompson	8:15	10:35
AS OR 2	"	Zitta	8:15	10:33
AS 83	"	Striggles	8:30	8:33
AV 33	"	Witkowski	9:23	9:40
AS 66	"	Striggles	8:33	4:55
AS 24	"	Schloman	8:40	8:45
AS 63	"	Schloman	8:45	8:50
AS 77	"	Schloman	8:50	11:50
AV 1421	"	Witkowski	9:40	11:25
AV 1409-1414	"	Witkowski	9:40	11:25
AV 1416-1419	"	Witkowski	9:50	11:25
AV 1427	"	Witkowski	9:55	11:25
AS 35	"	Zitta	10:37	11:25
AS 69	"	Thompson	10:37	3:30
AS 62	"	Zegers	11:00	3:44
AS 54	"	Painter	11:05	4:55
AS 63	"	Zitta	11:27	12:00
AS 80	"	Schloman	11:53	1:15
AS 76	"	Schloman	1:15	1:40
AS 12	"	Zita	1:~~40~~ 15	3:40
AS 79	"	Schloman	1:40	3:41
AS 68	"	Bastein	2:31	4:55
AS 72	"	Thompson	2:35	4:55

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[redacted]OVERNMENT
PRODUCTION LOG

INITIALS	DATE
T.M.W.	7/9/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AS 81	IRA	Schloman	8:00	9:15
AS 77	"	Zitta	8:00	9:40
AFD 3	"	Zeger	8:00	2:00
AFD 9	"	Bastien	8:00	10:50
AFD 11	"	Thompson	8:00	9:18
AS 78	"	Moulis	8:00	8:30
AFD 16	"	Painter	8:00	8:42
AS 75	"	Moulis	8:30	8:35
AS 79	"	Moulis	8:38	9:00
AFD 10	"	Painter	8:40	2:28
AS 82	"	Moulis	9:16	9:40
AS 89	"	Schloman	9:15	1:40
AFD 11	"	Thompson	8:00	9:18
AFD 14	"	Thompson	9:18	2:32
EX 2	"	Zitta	9:40	2:15
EX 3	"	Moulis	9:40	4:00
AFD 9	"	Bastein	10:50	4:55
EX 4	"	Schloman	1:41	4:00
AFD 8	"	Zegers	2:00	4:55
AFD 12	"	Painter	2:28	2:43
AFD 17	"	Thompson	2:32	4:55
AFD 19	"	Painter	2:43	3:55
AFD 18	"	Painter	3:55	4:03
EX 4	"	Schloman	4:00	4:40
AFD 20	"	Painter	4:30	4:55
EX 9	"	Schloman	4:40	4:55
	"	Total 26		

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Q.C. RAS 7/6/84 7-9-84 Jam. RA 7/11/84

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

REQUESTOR	CARTON NO.	FILE DESCRIPTION	NUMBER OF PAGES
JCS ✓	AS-74	Min-k Tape	2 ✓
" ✓	"	Min-k	10 ✓
" ✓	"	Miscellaneous Insulations	50 ✓
" ✓	"	Molten Metal Marinite	16 ✓
" ✓	"	Movable Walls	38 ✓ 5
" ✓	"	Packaging	10 ✓
" ✓	"	Asbestos Plant	14 ✓
RAS Q.C. ✓	"	Asbestos Packaging	32 ✓
			17 ✓
		lot	

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
JAB	7/3/84

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AS 68	IRA	Bastein	8:00	11:20
AS 72	IRA	Thompson	8:00	9:22
AS 15	IRA	Schloman	8:00	11:35
AS 66	IRA	Striggles	8:00	9:00
AS 54	IRA	Painter	8:00	1:24
AS 73	IRA	Zegers	8:15	9:35
AS 17	IRA	Zitta	8:25	9:45
AS 74	IRA	Striggles	9:03	11:00
AS 70	IRA	Thompson	9:25	2:30
AS 78	IRA	Zegers	9:35	1:36
AS 21	IRA	Zitta	9:45	1:58
AS OR 1	IRA	Striggles	11:05	2:23
AS 75	IRA	Schloman	11:05	11:35
EX 3	IRA	Schloman	11:35	4:55
AS 55	IRA	Painter	1:24	4:55
EX 4	IRA	Zegers	1:36	4:55
AS 24	IRA	Zitta	1:59	4:55
EX 5	IRA	Striggles	2:27	4:55
EX 12	IRA	Thompson	2:30	4:55
AS 6	IRA	Meadows	3:40	3:58
EX 2	IRA	Bastein	4:31	4:35
EX 10	IRA	Bastein	4:35	4:55
		Total 22		

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GOVERNMENT
PRODUCTION LOG

(2)

INITIALS	DATE
KCM.	7/6/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AFD 3	IRA	Zeger	3:30	4:19
AS 74	IRA	Schloman	3:30	4:55
AFD 6	IRA	Thompson	3:45	4:42
AFD 11	IRA	Thompson	3:45	4:55
AS 75	IRA	Vider	3:45	4:55
AFD 16	IRA	Painter	3:45	5:00
AFD 5	IRA	Striggles	3:55	4:13
AS 76	IRA	Moulis	3:57	4:00
B 601 a	IRA	Moulis	4:00	4:10
AS 78	IRA	Striggles	4:13	4:13
AS 77	IRA	Zitta	4:15	4:55
AFD 1	IRA	Striggles	4:15	4:18
AFD 5	IRA	Striggles	4:18	4:55
AS 81	IRA	Schloman	4:20	4:55
AFD 4	IRA	Thompson	8:00	3:30
AFD 1A	IRA	Bastein	4:36	4:41
		Total 43		

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3-9-84 Jan. IRA 1/16/84

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

REQUESTOR	CARTON NO.	FILE DESCRIPTION	NUMBER OF PAGES
MZ	AS 73	HILLBOARD PRODUCT INFO	60
		MICROTUF	2
		MICRATEX	8
		MICROQUARTZ	3
		MICRO LOK	50
		MICRO LITE DUCT LINER MICRO LITE DUCT INSULATION	4 1
		MICRO LITE	50
		MICRO FIBERS - WEB + MAT	2
		MICROCEL T-4 + T-2	4
		MICRO BAR	8
		MICRO AIRE	80
		METAL-ON PANELS	8
		METAL-ON	137
		METAL-OK	2
		MARINITE XL	19
			Tot 435
			438

OVERNMENT
PRODUCTION LOG

INITIALS	DATE
JAB	7/3/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AS 68	IRA	Bastein	8:00	11:20
AS 72	IRA	Thompson	8:00	9:22
AS 15	IRA	Schloman	8:00	11:35
AS 66	IRA	Striggles	8:00	9:00
AS 54	IRA	Painter	8:00	1:24
AS 73	IRA	Zegers	8:15	9:35
AS 17	IRA	Zitta	8:25	9:45
AS 74	IRA	Striggles	9:03	11:00
AS 70	IRA	Thompson	9:25	2:30
AS 78	IRA	Zegers	9:35	1:36
AS 21	IRA	Zitta	9:45	1:58
AS OR 1	IRA	Striggles	11:05	2:23
AS 75	IRA	Schloman	11:05	11:35
EX 3	IRA	Schloman	11:35	4:55
AS 55	IRA	Painter	1:24	4:55
EX 4	IRA	Zegers	1:36	4:55
AS 24	IRA	Zitta	1:59	4:55
EX 5	IRA	Striggles	2:27	4:55
EX 12	IRA	Thompson	2:30	4:55
AS 6	IRA	Meadows	3:40	3:58
EX 2	IRA	Bastein	4:31	4:35
EX 10	IRA	Bastein	4:35	4:55
		Total 22		

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GOVERNMENT
PRODUCTION-LOG

(1)

INITIALS	DATE
BCM.	7/6/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AS 39	IRA	Moulis	8:06	8:45
AS OR 1	IRA	Schloman	8:00	8:20
EX 15	IRA	Bastein	8:00	10:32
EX 14	IRA	Painter	8:00	3:45
EX 13	IRA	Zegers	8:00	9:55
EX 9	IRA	Striggles	8:00	9:25
AS 25	IRA	Zitta	8:00	4:15
EX 7	IRA	Thompson	8:00	8:27
AS 62	IRA	Schloman	8:27	9:41
EX 16	IRA	Thompson	8:31	11:27
AS 27	IRA	Moulis	8:45	9:28
AS 22	IRA	Moulis	9:28	9:30
AS 32	IRA	Moulis	9:30	10:45
AFD 1	IRA	Struggles	9:35	3:55
AS 66	IRA	Schloman	9:44	11:25
AS 33	IRA	Moulis	9:49	10:30
AFD 2	IRA	Zegers	9:55	3:28
AS 55	IRA	Moulis	10:30	10:40
AFD 1	IRA	Bastein	10:36	3:50
AS 67	IRA	Moulis	10:45	11:41
AS 64	IRA	Schloman	11:25	11:30
EX 54	IRA	Thompson	11:25	3:45
AS 68	IRA	Moulis	11:41	3:30
AS 70	IRA	Schloman	11:55	3:25
AS 71	IRA	Vider	1:10	2:00
AS 72	IRA	Vider	2:02	3:21
AS 73	IRA	Vider	3:30	3:45

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	TIME (BOX) OUT	TIME (BOX) IN
CIC67	IRA	O'Neill	1:24	2:21
CIC72	"	Papazian	1:34	1:56
CIC57	"	Vider	1:34	2:16
CIC58	"	"	1:38	2:20
CIC55	"	Moulis	1:52	2:20
CIC51	"	Papazian	1:56	2:21
CIC61	"	Vider	2:21	2:31
CIC60	"	Moulis	2:21	4:55
CIC70	"	O'Neill	2:22	2:56
CIC73	"	Papazian	2:22	2:36
CIC74	"	Holloway	2:26	4:55
CIC62	"	Vider	2:36	2:45
CIC71	"	Papazian	2:36	2:45
CIC63	"	Vider	2:45	2:54
CIC78	"	Papazian	2:46	4:47
CIC64	"	Vider	2:54	3:45
CIC77	"	O'Neill	3:32	4:35
CIC65	"	Vider	3:45	4:00
CIC66	"	"	4:00	4:10
CIC67	"	"	4:10	4:35
CIC68	"	"	4:35	4:36
CIC69	"	"	4:36	4:55
	Total 49			

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
[illegible]	7-6-84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
Cic 76	[illegible]	[illegible]		9:11
Cic 75	[illegible]	[illegible]		9:40
Cic 84	[illegible]	[illegible]	[illegible]	8:58
Cic 70	[illegible]	Vider	[illegible]	8:15
Cic 71	[illegible]	[illegible]	8:20	8:53
Cic 72		Vider	8:53	9:56
Cic 73		Vider	9:56	9:00
Cic 83		Holloway	8:58	9:00
Cic 74	[illegible]	[illegible]	9:00	9:22
Cic 81		O'Neylle	9:11	11:55
Cic 77		Vider	9:22	9:41
Cic 80		Papazian	9:40	10:45
Cic 75		Vider	9:41	9:55
Cic 76		Vider	9:55	10:30
Cic 78		Vider	10:30	11:05
Cic 82		Papazian	10:45	11:52
Cic 79		Vider	11:05	11:08
Cic 80		Vider	11:08	11:12
Cic 84		Vider	11:12	2:00
Cic 89		Papazian	11:52	2:00
Cic 89		Moulis	2:00	2:05
Cic 82		Moulis	2:05	2:58
Cic 87		O'Neale	2:15	4:55
Cic 84		~~Mousi~~ Moulis	2:58	3:00
Cic 85		~~Mousi~~ Moulis	2:55	~~3:25~~
[illegible]	[illegible]	[illegible]	3:45	[illegible]
Cic 86		Papazian	3:45	4:30

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7/6/84 7-9-84 C.J. FPA

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

REQUESTOR	CARTON NO.	FILE DESCRIPTION	NUMBER OF PAGES
RLV ✓	OK 21	Marinite	14
" ✓	[redacted]	"	12
			26
			26/TOTAL

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
CIC67	IRA	O'Neill	1:24	2:21
CIC72	"	Papazian	1:34	1:56
CIC57	"	Vider	1:34	2:16
CIC58	"	"	1:38	2:20
CIC55	"	Moulis	1:52	2:20
CIC51	"	Papazian	1:56	2:21
CIC61	"	Vider	2:21	2:31
CIC60	"	Moulis	2:21	4:55
CIC70	"	O'Neill	2:22	2:56
CIC73	"	Papazian	2:22	2:36
CIC74	"	Holloway	2:26	4:55
CIC62	"	Vider	2:36	2:45
CIC71	"	Papazian	2:36	2:45
CIC63	"	Vider	2:45	2:51
CIC78	"	Papazian	2:46	4:47
CIC64	"	Vider	2:51	3:45
CIC77	"	O'Neill	3:32	4:35
CIC65	"	Vider	3:45	4:00
CIC66	"	"	4:00	4:10
CIC67	"	"	4:10	4:35
CIC68	"	"	4:35	4:36
CIC69	"	"	4:36	4:55
	Total 44			

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
[illegible]	7-6-82

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
[illegible]	[illegible]	[illegible]		9:11
Cic 75	[illegible]	[illegible]	"	9:40
Cic 84	[illegible]	[illegible]	"	8:58
Cic 70	[illegible]	[illegible]	"	8:15
[illegible]	[illegible]	[illegible]	8:20	8:53
Cic 72		Vider	8:53	[illegible]
Cic 73	[illegible]	[illegible]	[illegible]	9:00
Cic 83		Hallowell	8:58	[illegible]
Cic 74	[illegible]	[illegible]	9:00	9:22
Cic 81	[illegible]	O'Neille	9:11	11:55
Cic 77		Vider	9:22	9:41
Cic 80		Papazian	9:40	10:45
Cic 75		Vider	9:41	9:45
Cic 76		Vider	9:55	10:30
Cic 78		Vider	10:30	11:05
Cic 82		Papazian	10:45	11:52
Cic 79		Vider	11:05	11:08
Cic 80		Vider	11:08	11:12
Cic 84		Vider	11:12	2:00
Cic 89		Papazian	11:52	2:00
Cic 89		Moulis	2:00	2:05
Cic 82		Moulis	2:05	2:58
Cic 87		O'Neale	2:15	4:55
Cic 84		~~Mousi~~ Moulis	2:58	3:00
Cic 85		~~Mousi~~ Moulis	2:55	~~3:35~~
[illegible]	[illegible]	[illegible]	3:45	[illegible]
Cic 86		Papazian	3:45	4:30

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
CIC67	IRA	O'Neill	1:24	2:21
CIC72	"	Papazian	1:34	1:56
CIC57	"	Vider	1:34	2:16
CIC58	"	"	1:38	2:20
CIC55	"	Moulis	1:52	2:20
CIC51	"	Papazian	1:56	2:21
CIC61	"	Vider	2:21	2:31
CIC60	"	Moulis	2:21	4:55
CIC70	"	O'Neill	2:22	2:56
CIC73	"	Papazian	2:22	2:36
CIC74	"	[illegible]	[illegible]	4:55
CIC62	"	Vider	2:36	2:45
CIC71	"	Papazian	2:36	2:45
CIC63	"	Vider	2:45	2:51
CIC78	"	Papazian	2:46	4:47
CIC64	"	Vider	2:51	3:45
CIC77	"	O'Neill	3:32	4:35
CIC65	"	Vider	3:45	4:00
CIC76	"	"	4:00	4:10
CIC67	"	"	4:10	4:35
CIC68	"	"	4:35	4:36
CIC69	"	"	4:36	4:55
	Total 44			

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
[illegible]	7-6-82

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	TIME (BOX) OUT	TIME (BOX) IN
Cic 76	[illegible]	[illegible]		9:11
Cic 75	[illegible]	[illegible]		9:40
Cic 84	[illegible]	[illegible]		8:58
Cic 70	[illegible]	[illegible]		8:15
Cic 71	[illegible]	[illegible]	8:20	8:53
Cic 72		Vider	8:53	[illegible]
Cic 73		[illegible]	[illegible]	9:00
Cic 83		Hallcraft	8:58	3:45
Cic 74	[illegible]	Vider	9:00	9:22
Cic 81		O'Neglle	9:11	11:55
Cic 77		Vider	9:22	9:41
Cic 80		Papazian	9:46	10:45
Cic 75		Vider	9:41	9:55
Cic 76		Vider	9:55	10:30
Cic 78		Vider	10:30	11:05
Cic 82		Papazian	10:45	11:52
Cic 79		Vider	11:05	11:08
Cic 80		Vider	11:08	11:12
Cic 84		Vider	11:12	2:00
Cic 89		Papazian	11:52	2:00
Cic 89		Moulis	2:00	2:05
Cic 82		Moulis	2:05	2:58
Cic 87		O'Neglle	2:15	[illegible]
Cic 84		~~Mousi~~ Moulis	2:58	3:00
Cic 85		~~Mousi~~ Moulis	2:55	~~3:35~~
[illegible]	[illegible]	[illegible]	3:45	[illegible]
Cic 86		Papazian	3:45	4:30

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GOVERNMENT PRODUCTION LOG

INITIALS	DATE
ACM.	7/6/84
TIME (BOX)	

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
AFD 3	IRA	Zeger	3:30	4:19
AS 74	IRA	Schloman	3:30	4:55
AFD 6	IRA	Thompson	3:45	4:42
AFD 11	IRA	Thompson	3:45	4:55
AS 75	IRA	Vider	3:45	4:55
AFD 16	IRA	Painter	3:45	5:00
AFD 5	IRA	Striggles	3:55	4:13
AS 76	IRA	Moulis	3:57	4:00
B 601 a	IRA	Moulis	4:00	4:10
AS 78	IRA	Striggles	4:13	4:13
AS 77	IRA	Zitta	4:15	4:55
AFD 1	IRA	Striggles	4:15	4:18
AFD 5	IRA	Striggles	4:18	4:55
AS 81	IRA	Schloman	4:20	4:55
AFD 4	IRA	Thompson	8:00	3:30
AFD 1A	IRA	Bastein	4:36	4:41
		Total 43		

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RFA

183. J-M objects to Request for Admission No. 183 on the grounds that it is ~~vague and ambiguous, overly broad~~ overly broad in that no time period is specified and vague and ambiguous, especially in its use of the terms "use" and "promote". Without waiving said objections, J-M responds as follows:

J-M ~~[illegible]~~ used its own literature to ~~promote~~ and sales of 85% ~~Magnesia~~ pipe and block insulation.

184. J-M objects to Request for Admission No. 184 on the grounds that it is overly broad in that no time period is specified, and vague and ambiguous, especially in its use of the terms "used" and "promotional literature." Without waiving said objections, J-M responds as follows:

~~J-M used its own literature to sales of 85%~~

Admitted.

185. Admitted that employees of J-M gave J-M literature describing J-M 85% Magnesia pipe and block insulation to non-government companies in the U.S. during times

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relevant to this lawsuit.

RFA [redacted] 186. ~~J-M can neither admit nor deny that Request~~

J-M has made reasonable inquiry and the information known or readily obtainable by J-M is insufficient to enable J-M to either admit or deny Request for Admission No. 186. Representatives of J-M distributors used J-M's literature as they saw fit.

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