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Attorneys for Defendant,  
OWENS-CORNING FIBERGLAS CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

JAMES ROY THOMPSON,  
  
Plaintiff,  
  
vs.  
  
JOHNS-MANVILLE CORPORATION,  
et al.,  
  
Defendant.

) CASE NO. C 295 305  
)  
) RESPONSE OF DEFENDANT, OWENS-  
) CORNING FIBERGLAS CORPORATION,  
) TO INTERROGATORIES PROPOUNDED BY  
) PLAINTIFF  
)  
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)

PROPOUNDING PARTY: Plaintiff  
RESPONDING PARTY: Defendant, OWENS-CORNING FIBERGLAS  
CORPORATION  
SET NUMBER: One

COMES NOW the Defendant, Owens-Corning Fiberglas  
Corporation, (hereinafter "OCF") and pursuant to California Code  
of Civil Procedure, Section 2030, responds to Plaintiff's

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1  
2 Interrogatories propounded to Defendant, Owens-Corning Fiberglas  
3 Corporation, on April 4, 1989, as follows:

4 GENERAL OBJECTIONS

5 OCF responds to these Interrogatories pursuant to  
6 General Order No. 22 dated November 10, 1988, and therefore  
7 states its objections generally rather than objecting to  
8 individual Interrogatories. These Responses are made without in  
9 any way waiving: (1) the right to object on the grounds of  
10 competency, privilege, relevancy, materiality, hearsay or any  
11 other proper ground, to the use of any such information, for any  
12 purpose, in whole or in part, in any subsequent stage or  
13 proceeding in this action or any other action; and (2) the right  
14 to object on any and all grounds, at any time, to any other  
15 discovery procedure involving or relating to the subject matter  
16 of these Interrogatories.

17 OCF objects to these Interrogatories as vague,  
18 ambiguous, uncertain, unclear, unduly burdensome and oppressive.

19 To the extent that these Interrogatories refer to  
20 injury or disease other than those allegedly experienced by  
21 Plaintiff herein or to asbestos-containing products other than  
22 those to which Plaintiff allegedly was exposed, OCF objects on  
23 the grounds that said information is beyond the proper scope of  
24 discovery and is not reasonably calculated to lead to the  
25 discovery of admissible evidence. To the extent said  
26 Interrogatories are not limited in time to the years of  
27 plaintiff's employment, OCF objects on the grounds that said  
28 Interrogatories are overly broad, unduly burdensome, and not

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1 reasonably calculated to lead to the discovery of admissible  
2 evidence.

3 OCF also objects to these Interrogatories to the  
4 extent that they seek information which is protected from  
5 discovery as attorney work product, attorney-client  
6 communications, protected by the right to privacy, any other  
7 applicable privilege, or material which is considered to be  
8 proprietary and trade secret.

9 Incorporating the above objections into each response,  
10 OCF responds as follows:

11 INTERROGATORY NO. 1:

12 Please state the full name, present business address,  
13 present residence and capacity or title of the individual  
14 answering or signing these Interrogatories on behalf of the  
15 answering defendant.

16 RESPONSE TO INTERROGATORY NO. 1:

17 Responses to these Interrogatories were prepared based  
18 upon a search of presently existing corporate files and records  
19 regularly maintained in the ordinary course of business of OCF  
20 and also information obtained during interviews with various  
21 employees of the company. No single officer, employee, or agent  
22 of the company has the direct knowledge or the proper documents  
23 necessary to supply each and every response required. All  
24 responses are derived from a number of sources, persons, and  
25 documents. The person signing the Responses to these  
26 Interrogatories does so solely to satisfy the requirements of  
27 California Code of Civil Procedure, Section 2030(g). The person  
28 signing the Responses does not, however, have direct knowledge

1 regarding any specific response but is informed that the files,  
2 documents, and interviews referred to above do support the  
3 Responses based upon information available as of the date of  
4 signature. These Interrogatories are signed by Barbara I.  
5 Feeny, Records Management Administrator, Owens-Corning Fiberglas  
6 Corporation, Fiberglas Tower, Toledo, Ohio 43659. The telephone  
7 number of the corporation is (419) 248-8000.

8 INTERROGATORY NO. 2:

9  
10 Have you ever, at any time, engaged in the manufacture  
11 of asbestos products?

12 RESPONSE TO INTERROGATORY NO. 2:

13 Without waiving its general objections, OCF states that  
14 it has engaged in the manufacture of products containing asbestos  
15 fibers.

16 INTERROGATORY NO. 3:

17 If your answer to Interrogatory No. 2 is in the  
18 affirmative, please state:

- 19 a. The trade name of such asbestos products, and  
20 their place of manufacture.
- 21 b. The name, address and telephone number of the  
22 manufacturer, supplier, dealer, or other entity to  
23 which such products were sold.

24 RESPONSE TO INTERROGATORY NO. 3:

25 Without waiving its general objections, OCF states that  
26 OCF manufactured asbestos-containing Kaylo at its Berlin, New  
27 Jersey, plant from May 1958 until November 1972, at which time  
28 the production of asbestos-containing Kaylo ceased. OCF  
manufactured Fyrcor at its Bloomington, Illinois plant from April

1 1970 until November 1972, at which time the production ceased.  
2 OCF manufactured cements, sewn blankets, metal mesh blankets,  
3 coatings, and mastics at its Newark, Ohio plant. OCF has prepared  
4 a Product Chart providing more information about its asbestos-  
5 containing products. A copy of this chart will be furnished upon  
6 request.

7 INTERROGATORY NO. 4:

8 In the manufacture of such products, did you use  
9 asbestos in any of its forms or other trade names to complete  
10 said manufacture?

11 RESPONSE TO INTERROGATORY NO. 4:

12 Without waiving its general objections, OCF states that  
13 it did use asbestos in the manufacture of some products, as  
14 stated in its Response to Interrogatory No. 3.

15 INTERROGATORY NO. 5:

16 If your answer to Interrogatory No. 4 is in the  
17 affirmative, please state:

- 18 a. The trade name of the asbestos product used;  
19 b. The name and address of the manufacturer or  
20 supplier of said asbestos products.

21 RESPONSE TO INTERROGATORY NO. 5:

22 Without waiving its general objections, OCF states:

- 23 a. To the best of its knowledge, OCF did not use an  
24 asbestos product identified by a trade name.  
25 b. Without waiving its general objections, OCF states  
26 that it has been unable to locate asbestos  
27 purchase records dated before 1964. However, for  
28

1  
2 years 1964 to 1972, raw asbestos was purchased  
3 from the following companies:

4 Lake Asbestos of Quebec

5 North American Asbestos Corp.

6 Carey Canadian Mines Ltd.

7 Johns-Manville

8 OCF is also aware that at least one other asbestos  
9 distributor has claimed that it sold asbestos to OCF or to its  
10 Supply and Contracting Division.

11 In addition, OCF may have purchased asbestos from the  
12 U.S. Government. The amounts and time frames are under  
13 investigation.

14 OCF's discovery is ongoing. If information responsive  
15 to this Interrogatory is discovered, OCF will supplement its  
16 Response in a timely manner.

17 INTERROGATORY NO. 6:

18 Have you ever, at any time, supplied or distributed  
19 asbestos or asbestos-containing products to any company or  
20 manufacturer of asbestos or asbestos containing products for  
21 thermal insulation, building products, transite or cement pipe?

22 RESPONSE TO INTERROGATORY NO. 6:

23 Without waiving its general objections, OCF states that  
24 from 1953 until 1958 OCF distributed asbestos-containing Kaylo  
25 which was manufactured by Owens-Illinois Glass Company ("OI").  
26 From May, 1958 through November, 1972, OCF sold  
27 asbestos-containing Kaylo which it manufactured at its Berlin,  
28 New Jersey, plant. From April, 1970 until November, 1972, OCF  
also sold Fyrcor, which it manufactured at its Bloomington,

1  
2 Illinois, plant. OCF also refers Plaintiff to its Response to  
3 Interrogatory No. 3.

4 INTERROGATORY NO. 7:

5 If your answer to Interrogatory No. 6 is in the  
6 affirmative, please state:

- 7 a. The trade name of the asbestos product which was  
8 supplied or distributed;  
9 b. The name and address of each company or  
10 manufacturer to which asbestos or asbestos-  
11 containing products were supplied.

12 RESPONSE TO INTERROGATORY NO. 7:

- 13 a. Without waiving its general objections, OCF refers  
14 Plaintiff to its Response to Interrogatory No. 6.  
15 b. See general objections.

16 INTERROGATORY NO. 8:

17 Have you ever purchased asbestos or asbestos-containing  
18 products from any company, distributor, manufacturer or mining  
19 concern for the purpose of using it in the manufacturing of  
20 thermal insulation, building products, transite or cement pipe?

21 RESPONSE TO INTERROGATORY NO. 8:

22 Without waiving its general objections, OCF refers  
23 Plaintiff to its Response to Interrogatory No. 5.

24 INTERROGATORY NO. 9:

25 If your answer to Interrogatory No. 8 is in the  
26 affirmative, please state:

- 27 a. The purpose for which such asbestos or asbestos  
28 containing products were purchased;  
b. The name and address of the company or

1  
2 manufacturer from which such asbestos or asbestos-  
3 containing products were purchased.

4 RESPONSE TO INTERROGATORY NO. 9:

5 Without waiving its general objections, OCF states:

- 6 a. That asbestos fibers were added to OCF's asbestos-  
7 containing thermal insulation products to  
8 (1) provide strength to the finished products;  
9 (2) prevent the solids, mixed in the manufacturing  
10 process, from settling out of the slurry; and  
11 (3) enhance the products' abilities to insulate  
12 high temperature surfaces.

- 13 b. OCF refers Plaintiff to its Response to  
14 Interrogatory No. 5(b).

15 INTERROGATORY NO. 10:

16 Have you ever engaged in the use, design, manufacture,  
17 formulation, fabrication, sale, or distribution of any asbestos,  
18 or asbestos bearing products in the course of designing,  
19 manufacturing, distributing, or selling thermal insulation,  
20 building products, transite or cement pipe and/or any components  
21 or parts thereof?

22 RESPONSE TO INTERROGATORY NO. 10:

23 Without waiving its general objections, OCF refers  
24 Plaintiff to its Response to Interrogatory No. 6.

25 INTERROGATORY NO. 11:

26 If your answer to Interrogatory 10 is in the  
27 affirmative, please state:

- 28 a. The trade names of any asbestos products which  
were used, designed, manufactured, formulated,



1  
2 fabricated, sold or distributed by you;

- 3 b. The trade names of any thermal insulation,  
4 building products, transite or cement pipe or any  
5 component part therefor which you designed,  
6 manufactured, distributed or sold, and in which  
7 you used any asbestos or asbestos bearing  
8 products.

9 RESPONSE TO INTERROGATORY NO. 11:

10 OCF refers Plaintiff to its Response to Interrogatory  
11 No. 6. See general objections.

12 INTERROGATORY NO. 12:

13 Have you ever engaged in the supply, design,  
14 manufacture, formulation, fabrication, sale, or distribution of  
15 any asbestos, or asbestos bearing product for use in the design,  
16 manufacture, distribution, or sale of thermal insulation,  
17 building products, transite or cement pipe and/or any components  
18 or parts thereof?

19 RESPONSE TO INTERROGATORY NO. 12:

20 Without waiving its general objections, OCF refers  
21 Plaintiff to its Response to Interrogatory No. 6.

22 INTERROGATORY NO. 13:

23 If your answer to Interrogatory 12 is in the  
24 affirmative, please state:

- 25 a. The trade names of any asbestos products which  
26 were used, designed, manufactured, formulated,  
27 fabricated, sold or distributed by you.  
28 b. The trade names of any thermal insulation,  
building products, transite or cement pipe, or

1  
2 component part therefor which you designed,  
3 manufactured, distributed or sold, and in which  
4 you used any asbestos or asbestos bearing  
5 product.

6 RESPONSE TO INTERROGATORY NO. 13:

7 OCF refers Plaintiff to its Response to Interrogatory  
8 No. 6. See general objections.

9 INTERROGATORY NO. 14:

10 Have you, at any time, engaged in the processing,  
11 marketing and sale of products containing asbestos fibers?

12 RESPONSE TO INTERROGATORY NO. 14:

13 Without waiving its general objections, OCF refers  
14 Plaintiff to its Response to Interrogatory No. 6.

15 INTERROGATORY NO. 15:

16 If your answer to Interrogatory No. 14 is in the  
17 affirmative, please state:

- 18 a. The trade or brand name of each such product,  
19 mined, manufactured and/or marketed.
- 20 b. The dates that each of such products were placed  
21 on the market.
- 22 c. The dates that each of such products were  
23 withdrawn from the market.
- 24 d. A description of the physical (i.e., chemical)  
25 composition of each such product, including the  
26 type of asbestos contained in each such product  
27 (i.e., amosite, chrysotile or crocidolite), the  
28 quantitative percentage of asbestos in each  
product, each non-asbestos chemical contained in

1 each such product, and the quantitative percentage  
2 of the non-asbestos content of each such product.

- 3 e. A description of the physical appearance of each  
4 such product.  
5 f. A detailed description of the intended use of each  
6 such product.  
7 g. The name of the manufacturer of each such product.  
8 h. The mining or milling concern from which the raw  
9 asbestos fiber was obtained.

10 RESPONSE TO INTERROGATORY NO. 15:

- 11 a-g. Without waiving its general objections, OCF refers  
12 Plaintiff to its Response to Interrogatory No. 3.  
13 h. OCF refers Plaintiff to its Response to  
14 Interrogatory No. 5(b). See general objections.

15 INTERROGATORY NO. 16:

16 Have any of the products listed in Interrogatory No. 15  
17 been altered in chemical composition or asbestos type or content  
18 since first being marketed?

19 RESPONSE TO INTERROGATORY NO. 16:

20 Without waiving its general objections, OCF states that  
21 the products listed on its Response to Interrogatory No. 3 were  
22 altered in chemical composition or asbestos type or content since  
23 first being marketed.

24 INTERROGATORY NO. 17:

25 If so, please state:

- 26 a. The trade name of each such product.  
27 b. The date each such product was altered.  
28 c. The nature of the alteration.

1 d. The reason for the alteration.

2 RESPONSE TO INTERROGATORY NO. 17:

3 Without waiving its general objections, OCF states that  
4 during the period of time that OCF manufactured asbestos-  
5 containing pipe, block, and core insulating materials, changes  
6 were made in the total amount of asbestos incorporated into the  
7 product and in the ratio of amosite to chrysotile asbestos used.  
8 In 1972, OCF removed all asbestos from Kaylo.

9 Variations occurred in the asbestos content because of  
10 attempts to improve its physical properties. Asbestos was  
11 removed from Kaylo after OCF became aware of certain medical  
12 literature relative to the effects of asbestos inhalation by  
13 workers in the industry and individuals working as insulators.

14 In addition, OCF refers Plaintiff to its historical  
15 documents which have been produced previously to Plaintiff's  
16 counsel. If Plaintiff wishes to secure an additional copy, the  
17 documents which have been or will be made available upon request  
18 at Plaintiff's expense.

19 INTERROGATORY NO. 18:

20 For each of the products identified in Interrogatory  
21 No. 16 above, please state the gross income realized by your  
22 company as a result of all sales within the United States for  
23 each year the product was sold.

24 RESPONSE TO INTERROGATORY NO. 18:

25 In addition to its general objections, OCF objects to  
26 this Interrogatory on the ground that the information sought is  
27 protected from discovery as provided in California Civil Code,  
28 Section 3295(a)(1) and (c).

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INTERROGATORY NO. 19:

For each of the products identified in Interrogatory No. 16 above, please state the gross income realized by your company, per year, for all sales to the United States government, and please further state:

- a. The gross income realized by your company, per year, for sales to the Naval supply system of the United States government.

RESPONSE TO INTERROGATORY NO. 19:

In addition to its general objections, OCF objects to this Interrogatory on the ground that the information sought is protected from discovery as provided in California Civil Code, Section 3295(a)(1) and (c).

INTERROGATORY NO. 20:

For each of the products identified in Interrogatory No. 15 above, please state the gross income realized by your company, per year, for sales to all insulation contractors with whom you did, or have done business.

RESPONSE TO INTERROGATORY NO. 20:

In addition to its general objections, OCF objects to this Interrogatory on the ground that the information sought is protected from discovery as provided in California Civil Code, Section 3295(a)(1) and (c).

INTERROGATORY NO. 21:

For each of the products identified in Interrogatory No. 15 above, please state the gross income realized by your company, per year, for sales of the products to entities not

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1 identified in previous Interrogatories, and identify each such  
2 entity.

3 RESPONSE TO INTERROGATORY NO. 21:

4 In addition to its general objections, OCF objects to  
5 this Interrogatory on the ground that the information sought is  
6 protected from discovery as provided in California Civil Code,  
7 Section 3295(a)(1) and (c).

8 INTERROGATORY NO. 22:

9 Do you have any records which reflect sales of each of  
10 the products identified by you in Interrogatory No. 15 above for  
11 each year said products were sold?

12 RESPONSE TO INTERROGATORY NO. 22:

13 Without waiving its general objections, OCF states that  
14 it does have records which reflect sales of individual products.

15 INTERROGATORY NO. 23:

16 If your answer to the preceding Interrogatory is in the  
17 affirmative, please state:

- 18 a. A description of said records or documents  
19 sufficient to permit Plaintiff to describe such  
20 documents for purposes of a notice to produce or a  
21 motion for production of documents.  
22 b. The name, business address and telephone number,  
23 employer, and job title of the person or persons  
24 having present custody of or control over the  
25 original of said documents.  
26

27 ///

1                   RESPONSE TO INTERROGATORY NO. 23:

2                   In addition to its general objections, OCF objects to  
3 this Interrogatory on the grounds that it is overly broad and  
4 unduly burdensome.

5                   Without waiving its general objections, OCF states:

- 6                   a.    OCF has invoices for asbestos-containing products  
7                   sold by its manufacturing plants.
- 8                   b.    OCF's record custodian is Barbara I. Feeny,  
9                   Records Management Administrator, Owens-Corning  
10                  Fiberglas Corporation, Fiberglas Tower, Toledo,  
11                  Ohio 43659. The telephone number of the  
12                  corporation is (419) 248-8000.

13                  INTERROGATORY NO. 24:

14                  For the period 1930 to January 1, 1978, do you have any  
15 written memoranda, specifications, blue prints or other written  
16 materials of any kind or character exist relating to the testing  
17 of the health effects of products identified in Interrogatory No.  
18 15 above? If so, please describe with sufficient particularity  
19 to satisfy the requirements of a subpoena [sic] duces tecum.

20                  RESPONSE TO INTERROGATORY NO. 24:

21                  OCF states that it performed numerous tests relating to  
22 the physical properties of its Kaylo products (breakage,  
23 shrinkage, density, corrosion, and thermal conductivity). See  
24 general objections.

25                  INTERROGATORY NO. 25:

26                  Did you make any design changes as a result of such  
27 tests?

28                  ///

1 RESPONSE TO INTERROGATORY NO. 25:

2 See general objections.

3 INTERROGATORY NO. 26:

4 If so, please state:

- 5 a. The nature of the change made.
- 6 b. The name, address and job classification of each
- 7 person in charge of making a change.

8 RESPONSE TO INTERROGATORY NO. 26:

9 a-b. See general objections.

10 INTERROGATORY NO. 27:

11 Have you, at any time, published and/or distributed any

12 brochures, sales literature, pamphlets or other materials (aside

13 from any caution labels on containers) of any kind or character

14 that contain any warnings, cautions, caveats, or directions

15 concerning the possibility of injury resulting from the use of

16 the products listed in Interrogatory No. 15 above?

17 RESPONSE TO INTERROGATORY NO. 27:

18 Without waiving its general objections, OCF on its own

19 and through the National Insulation Manufacturers Association

20 (NIMA) prepared and disseminated to contractors, distributors,

21 and insulators information regarding the health hazards

22 associated with asbestos-containing insulation. In 1968, NIMA

23 published a pamphlet entitled "Recommended Health Safety

24 Practices for Handling and Applying Thermal Insulation Products

25 Containing Asbestos." That pamphlet was distributed at meetings

26 of the Insulation Distributor Contractors National Association

27 (IDCNA). Additionally, OCF distributed that pamphlet to its

28 branch managers, Supply and Contracting (S&C) supervisors, Home



1 Building Products (HBP) supervisors, and S&C managers, with  
2 instructions to review the matter with their salesmen. OCF  
3 refers Plaintiff to Exhibit "A".  
4

5 OCF also participated through the education and  
6 legislative committee of NIMA, at regional meetings of the IDCNA  
7 in presenting to the distributors and contractors programs on  
8 health and safety. At those meetings, contractors and  
9 distributors: (1) were advised of the current status of health  
10 and safety activities pertinent to their business; (2) were given  
11 copies of the NIMA publications on health and safety practices  
12 and medical research literature; (3) discussed the contents of  
13 those publications; (4) discussed the merits of the proposed  
14 pre-employment and periodic physical examination programs on a  
15 cooperative employer-employee basis; (5) were urged to establish  
16 regional health and safety committees; and (6) were given an  
17 opportunity to ask questions of the experts. These NIMA programs  
18 were presented to contractors and distributors with the intention  
19 that this information would be passed on by the contractors and  
20 distributors to their employees.

21 INTERROGATORY NO. 28:

22 From 1930 until the present, did the asbestos products  
23 manufactured or distributed by you contain any warnings,  
24 cautions, caveats or other statements on the product or its  
25 packaging?

26 RESPONSE TO INTERROGATORY NO. 28:

27 Without waiving its general objections, OCF states that  
28 the asbestos products manufactured by OCF contained warnings,  
cautions, caveats, or other statements on the packaging.

1  
2 INTERROGATORY NO. 29:

3 If so, please state:

- 4 a. When did the warning first appear?
- 5 b. What was the precise wording of the warning, when
- 6 it first appeared?
- 7 c. Was the warning altered, amended or changed in any
- 8 manner? If so, how and when?
- 9 d. Where was the warning located on the product or
- 10 packaging?
- 11 e. When did you become aware of warnings placed on
- 12 products distributed by other manufacturers or
- 13 suppliers of asbestos or asbestos containing
- 14 products?
- 15 f. State the manner in which your product is shipped
- 16 and the type of container in which it is shipped
- 17 to retailers.
- 18 g. State whether any industrial psychologists or
- 19 human factors engineers were consulted prior to
- 20 utilizing such warnings, cautions, etc.

21 RESPONSE TO INTERROGATORY NO. 29:

22 Without waiving its general objections, OCF states that

23 from 1953 until mid-1958 OCF distributed Kaylo which was

24 manufactured and packaged by OI.

- 25 a. OCF placed written warnings on its Kaylo products
- 26 in 1966. After its purchase of the Bloomington,
- 27 Illinois, plant from Unarco on April 15, 1970, OCF
- 28 continued to use the warning labels which were
- printed on Unarco board (Fyrcor) packaging until

1  
2 approximately May 17, 1971, at which time OCF  
3 began to use a warning which was similar to the  
4 Kaylo warning on Unarcoboard (Fyrcor) packaging.  
5 In addition, OCF agreed in 1964 to have warnings  
6 placed on its OC-110 and OC-660 cements, later  
7 renamed SC-30 and SC-40, manufactured by  
8 Eagle-Picher. Those warnings were directed to all  
9 users of those products. OCF refers Plaintiff to  
10 Exhibits "B" and "C".

11 b. Beginning in 1967 the following warning was  
12 printed on the container used to ship Kaylo:  
13 "This product contains asbestos fiber. If dust is  
14 created when this product is handled, avoid  
15 breathing the dust. If adequate ventilation  
16 control is not possible, wear respirators approved  
17 by the U.S. Bureau of Mines." In approximately  
18 December, 1966, this cautionary statement was hand  
19 stamped on previously manufactured cartons of  
20 Kaylo. OCF refers Plaintiff to Exhibit "D".

21 c. In 1970, the Kaylo warning was changed to read  
22 "CAUTION - Product contains asbestos fiber.  
23 Inhalation of dust in excessive quantities over  
24 long periods of time may be harmful. Avoid  
25 breathing dust. If adequate ventilation is not  
26 possible, wear respirators approved by the U.S.  
27 Bureau of Mines for pneumoconiosis dust." OCF  
28 refers Plaintiff to Exhibit "E".

d. The warnings were printed on the containers in

1  
2 which the product was shipped. These printed  
3 warnings were visible to anyone handling the  
4 shipping cartons.

5 e. OCF is uncertain as to the exact date that it  
6 became aware that warning labels were being placed  
7 on competitors' asbestos-containing products. By  
8 a June 2, 1964, letter, an Eagle-Picher employee  
9 transmitted to an employee of OCF's Pacific Coast  
10 Division that portion of a National Insulation  
11 Manufacturers Association Board of Directors  
12 meeting minutes which dealt with a competitor's  
13 intention to use a cautionary label. This same  
14 letter also stated that Eagle-Picher was planning  
15 to attach a cautionary statement on its  
16 asbestos-containing cements. Eagle-Picher  
17 inquired of OCF at that time as to whether or not  
18 it should have Eagle-Picher place such a warning  
19 on the cements which it re-branded for OCF. On  
20 June 5, 1964, OCF agreed to have such labels  
21 applied to the re-branded cement.

22 f. OCF no longer manufactures or sells products  
23 containing asbestos.

24 g. To the best of OCF's information and belief, no  
25 industrial psychologist or human factors engineer  
26 was consulted in regard to warning labels.

27 Additionally, OCF refers Plaintiff to Exhibits "B,"

28 "C", "D", "E", and "F".  
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INTERROGATORY NO. 30:

When did you first receive notice that any person claimed injury as a result of exposure to asbestos or asbestos containing products manufactured and/or sold by you?

RESPONSE TO INTERROGATORY NO. 30:

Without waiving its general objections, OCF states that the date on which OCF first received notice of a person claiming injury was October, 1966. Neither the date of the filing nor the date of OCF's receipt of notice of the first Worker's Compensation claim is presently known but is believed to be in the late 1950s. OCF has been unable to locate records in its historical files relating to the Worker's Compensation claims filed by employees of its Supply and Contracting Division. OCF is aware that certain Plaintiffs' counsel have obtained certain of these records from the Worker's Compensation Commissions of various states and perhaps from other sources.

INTERROGATORY NO. 31:

With respect to the claim described in Interrogatory No. 30, please state:

- a. The name and address of the claimant.
- b. The date of notice of the claim.
- c. A description of the claim (i.e., workers' compensation, products liability, etc.).
- d. The type of injuries allegedly sustained.
- e. The name and address of the attorney who represented the individual making such claim.
- f. The style and court number of the claim, if any.
- g. The resolution of the claim.

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RESPONSE TO INTERROGATORY NO. 31:

Without waiving its general objections, OCF states as follows:

- a. Neither the name nor the address of the claimant was ever provided to OCF.
- b. The first date in regard to the claim found in OCF historical documents is October 5, 1966.
- c. The historical document describes the claim as "an asbestosis claim filed in Massachusetts."
- d. The claimant alleged asbestosis.
- e. OCF is unable to answer this Interrogatory.
- f. OCF is unable to answer this Interrogatory.
- g. OCF is unable to answer this Interrogatory.

INTERROGATORY NO. 32:

Do you have policies of insurance that cover the claims that have been made by Plaintiff herein?

RESPONSE TO INTERROGATORY NO. 32:

Without waiving its general objections, OCF states that it has not obtained specific coverage to protect it from claims relating to exposure to asbestos products. OCF has obtained general liability and Worker's Compensation insurance. That coverage is provided by the Aetna except for various states in which OCF participated in the state Workers' Compensation fund or is self-insured. OCF refers Plaintiff to Exhibit "G".

INTERROGATORY NO. 33:

If so, please list the names of each insurance carrier with whom you have coverage, the amount of such coverage, and the dates of each such policy.

1 RESPONSE TO INTERROGATORY NO. 33:

2 Without waiving its general objections, OCF refers  
3 Plaintiff to its Response to Interrogatory No. 32 and to Exhibit  
4 "G".

5 INTERROGATORY NO. 34:

6 Please describe in detail the type of packages in which  
7 you have sold asbestos material, listing the dates each type of  
8 package was used, a physical description thereof, and a  
9 description of any printed material or trademark that appeared  
10 thereon.

11 RESPONSE TO INTERROGATORY NO. 34:

12 Without waiving its general objections, OCF refers  
13 Plaintiff to Exhibits "H", "I", "J", "K", and "L".

14 INTERROGATORY NO. 35:

15 For the period 1930 to January 1, 1987, did you receive  
16 any reports or communications from your workers' compensation  
17 insurance carrier or products liability insurance carrier with  
18 regard to the hazards incident to the use of asbestos-containing  
19 products? If so, please state who had possession of said  
20 reports, the location of said reports, and the substance of the  
21 contents of said reports, listing for each such report the  
22 respective insurance company, its address and the agent signing  
23 such correspondence.

24 RESPONSE TO INTERROGATORY NO. 35:

25 OCF objects to this Interrogatory to the extent that it  
26 may call for privileged communications. See general objections.  
27

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2 Without waiving its objections, OCF refers Plaintiff to  
3 its historical documents which have been or will be made  
4 available for inspection to Plaintiff's counsel upon request.

5 INTERROGATORY NO. 36:

6 Have you imported asbestos or asbestos materials since  
7 1930?

8 RESPONSE TO INTERROGATORY NO. 36:

9 Without waiving its general objections, OCF states that  
10 it is not informed of the definition of the word "imported" as  
11 used in this Interrogatory. OCF understands that most if not all  
12 of the raw asbestos used in its asbestos-containing products was  
13 mined outside the United States. OCF refers Plaintiff to its  
14 Response to Interrogatory No. 5.

15 INTERROGATORY NO. 37:

16 If the answer to the preceding Interrogatory is in the  
17 affirmative, please state:

- 18 a. From where the asbestos or asbestos materials were  
19 imported.
- 20 b. How long you have imported asbestos or asbestos  
21 materials.
- 22 c. Whether you have supplied this imported asbestos  
23 or asbestos material to any of the other  
24 defendants since 1945, when these transactions  
25 took place and where.
- 26 d. Whether any warnings, cautions, caveats, or  
27 directions accompanied the materials referred to  
28 in subpart (c) above, and the date these first  
appeared.



1           RESPONSE TO INTERROGATORY NO. 37:

2           Without waiving its general objections, OCF refers  
3 Plaintiff to its Responses to Interrogatories No. 5 and 36.

4           INTERROGATORY NO. 38:

5           If you have discontinued manufacturing and/or selling  
6 any asbestos products, please state the reason or reasons  
7 therefor.

8           RESPONSE TO INTERROGATORY NO. 38:

9           Without waiving its general objections, OCF states that  
10 the production of asbestos-containing Kaylo ceased because OCF  
11 wanted to use its own product, fibrous glass, and because OCF  
12 became aware of certain medical literature relative to asbestos  
13 and health.

14           INTERROGATORY NO. 39:

15           Have any other manufacturers or suppliers of asbestos  
16 or asbestos containing products ever furnished you with  
17 information as to the state of medical knowledge regarding the  
18 connection between asbestos exposure and the contracting of  
19 cancer or asbestosis?

20           RESPONSE TO INTERROGATORY NO. 39:

21           Without waiving its general objections, OCF states that  
22 other manufacturers or suppliers of asbestos or asbestos-  
23 containing products have furnished OCF with information as to the  
24 state of medical knowledge regarding the connection between  
25 asbestos exposure and the contracting of asbestosis or cancer.  
26

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1 INTERROGATORY NO. 40:

2 If the answer to the preceding Interrogatory is in the  
3 affirmative, please state:

- 4 a. What information was furnished to you.  
5 b. The date the information was furnished to you.  
6 c. The names of all parties who furnished the  
7 information to you.  
8

9 RESPONSE TO INTERROGATORY NO. 40:

10 Without waiving its general objections, OCF states that  
11 in 1956, prior to the acquisition of the Kaylo manufacturing  
12 plant from OI, OCF inquired into the information that OI  
13 regarding the health aspects of the OI Kaylo product. OCF was  
14 informed that a study at Saranac Lake, published in 1955, showed  
15 that animals, if exposed for a prolonged period of time to high  
16 concentrations of Kaylo dust, could develop a mild asbestotic  
17 reaction. However, OCF was informed at the same time that  
18 experience in the manufacturing plants, including x-ray results,  
19 revealed no lung changes that could be attributed to the  
20 occupational exposure to Kaylo.

21 Other documents, presumably received from OI around the  
22 time of the acquisition, informed OCF that OI had concluded,  
23 based on this experience in the factories and in the field and  
24 its consideration of the Saranac report, that the actual hazard  
25 to the health of those handling Kaylo was considered to be small.  
26 These OCF historical documents have been or will be made  
27 available to Plaintiff's counsel upon request.

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1 INTERROGATORY NO. 41:

2 Have any manufacturers or suppliers of asbestos or  
3 asbestos containing products furnished to you or have you  
4 furnished any other manufacturers or suppliers of asbestos or  
5 asbestos containing products the results of any research, tests,  
6 medical studies or experiments regarding the state of the medical  
7 knowledge as to the connection between asbestos exposure and the  
8 contracting of cancer or asbestosis, since 1930?

9 RESPONSE TO INTERROGATORY NO. 41:

10 Without waiving its general objections, OCF refers  
11 Plaintiff to its Response to Interrogatory No. 40.

12 INTERROGATORY NO. 42:

13 If your answer to the preceding Interrogatory is in the  
14 affirmative, please state:

- 15 a. When each took place.  
16 b. Who participated in each.  
17 c. A summary of the content of each document or  
18 communication.

19 RESPONSE TO INTERROGATORY NO. 42:

20 Without waiving its general objections, OCF refers  
21 Plaintiff to its Response to Interrogatory No. 40.

22 INTERROGATORY NO. 43:

23 Have you ever conducted or sponsored or contributed  
24 financially to any studies or research to determine if the  
25 inhalation of asbestos fibers may be harmful? If so, please  
26 state:

- 27 a. By whom the research was conducted, giving  
28 complete names and addresses.

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- b. The dates that each such test was conducted.
- c. The complete results of each test or study.
- d. Whether you will supply copies of reports of the research department pertaining to the use of the corporation of asbestos and their manufactured insulation products, without necessity of a formal notice to produce or motion to produce documents, and, if so, please attach said copies to your answers to interrogatories.

RESPONSE TO INTERROGATORY NO. 43:

Without waiving its general objections, OCF states that prior to OCF's purchase of the Berlin, New Jersey, plant from OI, OI conducted such studies. These studies were conducted at the Trudeau Institute, Saranac Laboratories, at Saranac Lake, New York.

In addition, OCF refers Plaintiff to Exhibit "M", which is a collection of National Insulation Manufacturers Association (NIMA) Board of Directors meeting minutes, which show that NIMA established a Safety Program and that NIMA had a Technical and Research Committee. A representative of OCF sat on the NIMA and Thermal Insulation Manufacturers Association (TIMA) Boards of Directors and on various committees. OCF contributed its proportionate share to the research conducted or sponsored by TIMA. Hence most studies conducted by TIMA were in part supported by OCF.

In addition, OCF's Medical Director conducted an epidemiology study in 1970. OCF refers Plaintiff to Exhibit "N".

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INTERROGATORY NO. 44:

State the names and addresses of your chief medical officers from 1930 until the present time, listing the periods of time each such medical officer was employed by you, and in what capacity.

RESPONSE TO INTERROGATORY NO. 44:

Without waiving its general objections, OCF states that Dr. Jon L. Konzen, Vice President, Medical and Health Affairs, Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio 43659, was hired on January 15, 1968, as Corporate Medical Director and was promoted to his present position in November, 1985.

Dr. Michael G. Holthouser, Director, Corporate Medical Services, Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio 43659, was hired in June, 1988, and continues in this position to date.

Dr. Jean Arnold Chapman, Corporate Medical Director, Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio 43659. Dr. Chapman was hired November 11, 1985, and was terminated February 29, 1988.

Dr. D.J. Billmaier formerly served as Assistant Corporate Medical Director, Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio 43659. Dr. Billmaier was hired December 30, 1974, and was employed through August 29, 1980. He was replaced by Dr. Rufus W. Miller, who was hired on November 10, 1980, and terminated in September, 1984. Dr. Miller was succeeded by Dr. Kenneth Gould who was hired in September, 1984

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1 and who was employed through August, 1985. This position has  
2 been vacant since August, 1985.

3 Dr. S.K. Remley, Corporate Staff Physician, Owens-  
4 Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio  
5 43659. Dr. Remley was hired February 5, 1979, and continues in  
6 this position.

7 INTERROGATORY NO. 45:

8 Name the person in the corporate structure to whom the  
9 chief medical officer reports, also giving that person's position  
10 or job title in the corporation.

11 RESPONSE TO INTERROGATORY NO. 45:

12 Without waiving its general objections, OCF states that  
13 Dr. Jon L. Konzen, Vice President, Medical and Health Affairs,  
14 Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo,  
15 Ohio 43659, was hired on January 15, 1968, as Corporate Medical  
16 Director and was promoted to his present position in November,  
17 1985. Dr. Jon L. Konzen formerly reported to R.A. Yudkin and Dr.  
18 Robert C. Doban, who have since retired. Dr. Konzen now reports  
19 to Dr. Joel Bender, Vice President, Health, Safety, and  
20 Environmental Affairs.

21 INTERROGATORY NO. 46:

22 Please state the duties and responsibilities of the  
23 corporation's chief medical officer.

24 RESPONSE TO INTERROGATORY NO. 46:

25 Without waiving its general objections, OCF refers  
26 Plaintiff to its Response to Interrogatory No. 45. As the  
27 corporation's Chief Medical Officer, Dr. Konzen has three  
28 essential responsibilities: first, to develop scientific and

1 medical knowledge concerning the health effects of products made  
2 and sold by the company, materials used in OCF's manufacturing  
3 process, and new products and processes under development;  
4 second, to design and manage medical research programs; and  
5 third, to represent the company in matters concerning health.

6 INTERROGATORY NO. 47:

7 Please state the names and addresses of all physicians  
8 who were employed, retained, or otherwise engaged by you at any  
9 of your facilities from the year 1930 until the present time for  
10 the purposes of evaluating, diagnosing or treating pulmonary  
11 complaints or problems in past, present or prospective employees.

12 RESPONSE TO INTERROGATORY NO. 47:

13 Without waiving its general objections, OCF states that  
14 Dr. Jon L. Konzen, Vice President, Medical and Health Affairs,  
15 Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo,  
16 Ohio 43659, was hired on January 15, 1968, as Corporate Medical  
17 Director and was promoted to his present position in November,  
18 1985.

19 Dr. Michael G. Holthouser, Director, Corporate Medical  
20 Services, Owens-Corning Fiberglas Corporation, Fiberglas Tower,  
21 Toledo, Ohio 43659, was hired in June, 1988, and continues in  
22 this position to date.

23 Dr. Jean Arnold Chapman, Corporate Medical Director,  
24 Owens-Corning Fiberglas Corporation, Fiberglas Tower, Toledo,  
25 Ohio 43659. Dr. Chapman was hired November 11, 1985, and was  
26 terminated February 29, 1988.

27 Dr. D.J. Billmaier formerly served as Assistant  
28 Corporate Medical Director, Owens-Corning Fiberglas Corporation,

1 Fiberglas Tower, Toledo, Ohio 43659. Dr. Billmaier was hired  
2 December 30, 1974, and was employed through August 29, 1980. He  
3 was replaced by Dr. Rufus W. Miller, who was hired on November  
4 10, 1980, and terminated in September, 1984. Dr. Miller was  
5 succeeded by Dr. Kenneth Gould, who was hired in September, 1984,  
6 and who was employed through August, 1985. This position has  
7 been vacant since August, 1985.

8 Dr. S.K. Remley, Corporate Staff Physician, Owens-  
9 Corning Fiberglas Corporation, Fiberglas Tower, Toledo, Ohio  
10 43659. Dr. Remley was hired February 5, 1979, and continues in  
11 this position.

12 Berlin Doctors

13 OCF's Berlin, New Jersey, manufacturing facility used  
14 the services of Dr. H.C. Shwartz (deceased) from 1958 to 1970.  
15 From April 27, 1970, to October, 1978, Dr. John McNally, 214  
16 Whitehorse Pike, Berlin, New Jersey, was employed at the Berlin  
17 facility. From November, 1978, to the present, Dr. Priscillano  
18 Parilla, 214 Whitehorse Pike, Berlin, New Jersey, has been the  
19 physician at the Berlin facility. These doctors performed  
20 pre-employment physicals and periodic physical examinations.

21 Bloomington Doctors

22 OCF's Bloomington, Illinois, manufacturing facility  
23 used the services of Dr. George B. McNeely, 2302 E. Oakland  
24 Avenue, Bloomington, Illinois, from April, 1970, to July, 1977;  
25 Dr. N. Lee Still, 2103 E. Washington, Bloomington, Illinois, from  
26 July, 1977, to July, 1978; and Dr. James A. Bilyeu, 1 Medical  
27 Hills Avenue, Bloomington, Illinois, from July, 1978, until 1982,  
28 when the plant was sold.



1 These doctors conducted pre-employment physicals and  
2 periodic physical examinations and were employed on a contract  
3 basis.

4 Doctors used for reading chest x-rays, medical  
5 examinations, and consultation of plant employees at Berlin, New  
6 Jersey, and Bloomington, Illinois:

<u>Physician/Consultant and Last Address</u>	<u>Date</u>	<u>Plant</u>
Richard M. Sproch, M.D. 350 Kings Highway, E. Haddonfield, NJ	1961-1964	Berlin
E. Spencer Paisley, M.D. 501 White Horse Pike Haddon Heights, NJ 08035	1969-1974	Berlin
I.T. Higgins, M.D. School of Public Health University of Michigan Ann Arbor, MI 48104	1969-1970	Berlin
George Wright, M.D. (Retired) 460 S. Marion Parkway Parklane Apartments Denver, CO 80209	1971	Berlin and Bloomington
Dr. Harold Magnuson Institute of Indus. Health University of Michigan Ann Arbor, MI 48104	1958 to approx. 1961	Berlin
Walter Whitehouse, M.D. Institute of Industrial Health University of Michigan Ann Arbor, MI 48104	1958-1961	Berlin
Paul Scholtens, M.D. Institute of Industrial Health University of Michigan Ann Arbor, MI 48104	1958-1961	Berlin
Theodore Dietchek, M.D. Institute of Industrial Health University of Michigan Ann Arbor, MI 48104	1958-1961	Berlin

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Drs. Goldenberg, Keinle,  
Steeb, Schaupp, Limcaco  
& Petrovich  
(Radiology Group)  
West Jersey Hospital  
Berlin, NJ 1965 to  
present Berlin

Dr. C.R. Johnson  
Professional Health Services  
(Mobile Van Testing) 1974 to  
present Berlin

Joseph W. Sokolowski, Jr., M.D.  
and Irwin Spirn  
1916 E. Malton Pike  
Cherry Hill, NJ 1974 to  
present Berlin

Dr. Chauncey McGeorge  
66 Tanner Street  
Haddonfield, NJ 1982 to  
present Berlin

Bloomington Radiology  
Bloomington, IL 1970-1978 Bloomington

St. Joseph's Hospital  
Radiology Department  
Bloomington, IL 1974-1978 Bloomington

James Bilyeau, M.D.  
1 Medical Hills Drive  
Bloomington, IL 1978-1982  
(plant sold) Bloomington

Doctors used for examinations of Contract Unit

Employees: (In 1973, these doctors were used for examinations.  
The Contracting Division was sold in February, 1987).

Richard K. Bath, M.D.  
1124 Carew Towers  
Cincinnati, OH  
Willis Taylor, M.D.  
West Side Family Health  
Center  
700 N. High School Road  
Indianapolis, IN

Alexander Greer, M.D.  
West 104th Fifth  
Spokane, WA 99204  
Leon A. Sealey, M.D.  
Northwest Industrial  
Medical Clinic  
1500 First Avenue, South  
Seattle, WA 98101

Sutter Clinic, Inc.  
819 Locust Street  
St. Louis, MO 63101

William D. Forney, M.D.  
425 W. Bannack  
Boise, ID 83702

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Drs. Vanthoff, Yost,  
Kempers & Vroon  
ATTN: Dr. Richmond  
50 College S.E.  
Grand Rapids, MI

Rodman Wilson, M.D.  
3300 Providence Drive  
Suite 301  
Anchorage, AL 99504

Robert D. Helferty, M.D.  
Industrial Medical  
Center PC, Inc.  
1116 Ann Arbor Street  
P.O. Box 3310  
Flint, MI 48503

John J. Krygier, M.D.  
511 S.W. 10th Street  
Portland, OR

Dr. Benjamin Schneider  
123 E. Market Street  
Danville, PA

National Medical  
Consultants Inc. (Clinic)  
Suite 414 Fox Ridge Tower  
Mission, KS 66202

Dr. Gordon Neilson  
Page Medical Center  
800 Elm  
Page, AZ

Maurice Johnston, M.D.  
Kelsey-Seybold Clinic  
6624 Fannin Street  
Houston, TX 77025

Dr. Melvin Bechtel  
10804 Prairie Hills Drive  
Omaha, NE 68144

Dr. Roy Hardman  
5432 I.H. 35  
Austin, TX 78744

B. Dwight Culver, M.D.  
College of Medicine  
Dept. of Community &  
Environmental Medicine  
Med. Surg. II -- Room 367  
University of California  
Irvine, CA

Dr. Arnold Albert  
1028 South Alamo  
San Antonio, TX

Dr. Kaare Lovall  
Family Medical Clinic Bldg  
2132 N. Cedar  
Holt, MI 48842

Dr. Patrick Clancy  
400 "O" Street  
Sacramento, CA 95814

Dr. J.J. Applegarth  
384 Post Street  
San Francisco, CA 94102

Riverside Clinic  
ATTN: W. McCauley, Adm.  
8445 E. Jefferson  
Detroit, MI 48214

Dr. A.V. Swanberg  
610 7th Street  
Kalespell, MT 59901

INTERROGATORY NO. 48:

Please state the names and addresses of all persons employed by you from 1930 through January 1, 1978, who function as industrial hygienists. As contemplated by these Interrogatories, an industrial hygienist is one that performs engineering or health studies to identify and evaluate potential

1 occupational health hazards, and suggests methods of dealing with  
2 the same. With respect to each person employed by you as an  
3 industrial hygienist, please state:

- 4 a. The facility or office to which each was assigned.  
5 b. His or her complete and precise duties and  
6 responsibilities.  
7

8 RESPONSE TO INTERROGATORY NO. 48:

9 Without waiving its general objections, OCF states that  
10 Gerald Devitt was hired as Industrial Hygienist in August, 1970,  
11 and remained in this position as Chief Industrial Hygienist until  
12 his retirement on October 31, 1986. Charles W. Axten was hired  
13 as Manager of Industrial Hygiene on July 14, 1986, and held that  
14 position until mid-1988. He currently is Director of  
15 Occupational Safety and Health. J. Kenneth Conover, who was  
16 hired as an Industrial Hygienist in August, 1986, was promoted to  
17 Supervisor of Industrial Hygiene on June 1, 1988. He is employed  
18 in the Fiberglas Tower, Toledo, Ohio. His duties and  
19 responsibilities are to evaluate and recommend programs relating  
20 to the industrial hygiene of OCF's employees.

21 F.W. Lichtenberg was hired as a technical information  
22 specialist in April, 1975, and later served as an Industrial  
23 Hygienist from March, 1977, until June 30, 1980.

24 Regina Brown was an Industrial Hygienist for OCF from  
25 June 15, 1980, until January 1, 1982.

26 Michael J. Guisfredi was hired February, 1978, as a  
27 Technologist Hygienist and became Staff Industrial Hygienist in  
28 February, 1987.

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1 J. David Lawson was hired as a Staff Industrial  
2 Hygienist on July 7, 1986, and currently holds that position.

3 Kathleen A. Johnson was hired as a Staff Industrial  
4 Hygienist in July, 1987, and held that position until June, 1988.

5 Bruce A. Kavas was hired as a Staff Industrial  
6 Hygienist on September 6, 1988, and currently holds that  
7 position.

8 John M. Horwath was hired as a Staff Industrial  
9 Hygienist on September 12, 1988, and currently holds that  
10 position.

11 INTERROGATORY NO. 49:

12 Did your medical officers, physicians or industrial  
13 hygienists at any time, ever make any recommendations and/or  
14 suggestions to you pertaining to the risks or hazards to persons  
15 involved in the manufacturing or use of insulation products  
16 containing asbestos? If so, please state:

- 17 a. Where the recommendations were made.  
18 b. To whom they were made.  
19 c. By whom they were made.  
20 d. The substance of each recommendation.

21 RESPONSE TO INTERROGATORY NO. 49:

22 Without waiving its general objections, OCF refers  
23 Plaintiff to its historical documents which have been or will be  
24 made available for inspection to Plaintiff's counsel upon  
25 request.

26 INTERROGATORY NO. 50:

27 Please state the names of trade association periodicals  
28 to which you subscribed from 1928 to January 1, 1978. State

1 whether or not during said period, you had any knowledge of any  
2 articles being printed in industry trade journals, essays,  
3 memoranda, and other similar sources pertaining to the hazardous  
4 potentials of asbestos, and please further state which of such  
5 articles were received by you.

6 RESPONSE TO INTERROGATORY NO. 50:

7 Without waiving its general objections, OCF states that  
8 it has subscribed to the following trade association periodicals:

9 Journal of Occupational Medicine

10 Industrial Hygiene Digest (literature abstracts)

11 American Industrial Hygiene Association Journal

12 Journal of Occupational Safety and Health

13 New England Journal of Medicine

14 The Medical Letter

15 Archives of Environmental Health

16 Occupational Safety and Health Reporter (BNA)

17 Chemical Reporter (BNA)

18 Journal of American Medical Association

19 American Journal of Public Health

20 Archives of Internal Medicine

21 British Journal of Public Health

22 The Medical Clinics of North America

23 OCF also refers Plaintiff to Exhibit "O", a  
24 bibliography of medical articles which OCF has received.

25 INTERROGATORY NO. 51:

26 Name those organizations, groups, intercompany or  
27 industrial organizations, their committees or subcommittees, to  
28 which you belong which conducted studies or researched

1 relationships, if any, between exposure to asbestos fibers or  
2 products and asbestosis and lung cancer, from 1945 to 1970 and  
3 the years of your membership.

4 RESPONSE TO INTERROGATORY NO. 51:

5 Without waiving its general objections, OCF refers  
6 Plaintiff to its Responses to Interrogatories No. 43 and 50. In  
7 addition, OCF has belonged to the following organizations, which  
8 may have conducted studies or researched the relationships, if  
9 any, between exposure to asbestos fibers or products and  
10 asbestosis and lung cancer:

11 National Insulation Manufacturers  
12 Association, Inc.

13 Thermal Insulation Manufacturers Association, Inc.

14 National Mineral Wool Association

15 Industrial Hygiene Foundation of America  
16 and its successor, Industrial Health  
Foundation

17 National Insulation Contractors Association

18 Plaintiff's Interrogatory could more appropriately be  
19 addressed to these organizations than to OCF. In addition, OCF  
20 refers Plaintiff to its historical documents which have been or  
21 will be made available to Plaintiff's counsel upon request.

22 INTERROGATORY NO. 52:

23 Have you received copies of transcribed minutes of the  
24 various committee meetings, subcommittee meetings, general  
25 meetings and Board of Director meetings of any organization  
26 listed in Response to Interrogatory No. 51 within one year of  
27 such meetings?

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RESPONSE TO INTERROGATORY NO. 52:

Without waiving its general objections, OCF states that it has received copies of transcribed minutes of some committee meetings, some section meetings, and some Board of Director meetings from the National Insulation Manufacturers Association, Inc.

INTERROGATORY NO. 53:

Please state the amounts you have spent or contributed annually, from 1930 until January 1, 1978, for research specifically directed to the relationship, if any, between an exposure to asbestos containing products and asbestosis, lung cancer or any other pulmonary disease.

RESPONSE TO INTERROGATORY NO. 53:

Without waiving its general objections, OCF refers Plaintiff to its Response to Interrogatory No. 43.

INTERROGATORY NO. 54:

Please state the amount you have annually contributed through January 1, 1978 to any independent medical research group or groups conducting research into the relationship, if any, between exposure of those employees who work with asbestos containing products to asbestosis and any pulmonary disease.

RESPONSE TO INTERROGATORY NO. 54:

Without waiving its general objections, OCF refers Plaintiff to its Response to Interrogatory No. 43.

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1 INTERROGATORY NO. 55:

2 Please state the names and addresses of the  
3 organizations or groups conducting the studies referred to in  
4 your answer to Interrogatories 53 and 54, above.

5 RESPONSE TO INTERROGATORY NO. 55:

6 Without waiving its general objections, OCF refers  
7 Plaintiff to its Response to Interrogatory No. 43.

8 INTERROGATORY NO. 56:

9 Have you had a department, division or section devoted  
10 to scientific and/or medical research during the period from 1930  
11 until January 1, 1978? If so, please state its title(s) and when  
12 it was first formed.

13 RESPONSE TO INTERROGATORY NO. 56:

14 Without waiving its general objections, OCF states that  
15 it has never had a Medical Research Department but that it has  
16 had a Research and Development Department which has operated  
17 continuously since 1938. OCF formed a Medical Department in 1968  
18 and appointed Dr. Jon L. Konzen as Medical Director.

19 INTERROGATORY NO. 57:

20 Please state the scientific or medical periodicals to  
21 which you, your medical department or industrial hygiene division  
22 subscribed during the period between 1930 and 1964, specifying  
23 the date such subscriptions were begun.

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RESPONSE TO INTERROGATORY NO. 57:

Without waiving its general objections, OCF states that it has subscribed to the following scientific or medical periodicals:

Journal of Occupational Medicine

Industrial Hygiene Digest (literature abstracts)

American Industrial Hygiene Association Journal

Journal of Occupational Safety and Health

New England Journal of Medicine

The Medical Letter

Archives of Environmental Health

Occupational Safety and Health Reporter (BNA)

Chemical Reporter (BNA)

Journal of American Medical Association

American Journal of Public Health

Archives of Internal Medicine

British Journal of Public Health

The Medical Clinics of North America

INTERROGATORY NO. 58:

Please state whether any of your asbestos containing products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amounts of dust exceeding threshold limit values. If so, state:

- a. When these instructions were given.
- b. By whom these instructions were given.
- c. Whether the instructions were oral or written.
- d. The precise content of the instructions.

1 e. If the instructions were written, please attach a  
2 copy of the instructions.

3 RESPONSE TO INTERROGATORY NO. 58:

4 Without waiving its general objections, OCF refers  
5 Plaintiff to its Responses to Interrogatories No. 27 and 29(a-b),  
6 and to Exhibits "A", "B", "C", "D", "E", and "F". OCF also  
7 refers Plaintiff to Exhibits "P", "Q", "R", and "S", material  
8 which OCF supplied to purchasers of its asbestos-containing  
9 products.

10 INTERROGATORY NO. 59:

11 Did any representatives of yours attend the 20th annual  
12 meeting of the IHF in November, 1955, in Pittsburgh,  
13 Pennsylvania? If so, give the name and current address of each  
14 such attendee.

15 RESPONSE TO INTERROGATORY NO. 59:

16 Without waiving its general objections, OCF states that  
17 to its present knowledge, no OCF representative attended the  
18 twentieth annual meeting of the Industrial Hygiene Foundation in  
19 November, 1955 in Pittsburgh, Pennsylvania.

20 INTERROGATORY NO. 60:

21 Have you received a copy or copies of the Industrial  
22 Hygiene Digest published monthly by the IHF, and if so, state the  
23 date of initial receipt of such publication.

24 RESPONSE TO INTERROGATORY NO. 60:

25 OCF states that to the best of its present knowledge,  
26 the first Industrial Hygiene Digest which it received was  
27 published in January 1954. See general objections.

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INTERROGATORY NO. 61:

Have you ever requested IHF officials to:

- a. Perform a search of the medical literature to determine whether any scientists or doctors were reporting cases of asbestosis and/or lung cancer in ship workers, mechanics or others working with or exposed to asbestos containing products, or discussing the potential hazards incident to use of asbestos containing products.
- b. Perform any studies or research into potential health hazards incident to the use of asbestos containing products.
- c. Review governmental publications of Great Britain for determining whether research was being conducted by the British government into any potential health hazards incident to the use of insulation products containing asbestos.
- d. Review governmental publications of Great Britain to determine whether the Chief Inspector of Factories, or any other British government agency, had issued any regulations or published any findings relative to potential health hazards incident to the use of insulation products containing asbestos.

RESPONSE TO INTERROGATORY NO. 61:

Without waiving its general objections, OCF states that to the best of its knowledge, it has made no requests of the officials of the Industrial Hygiene Foundation.

1 INTERROGATORY NO. 62:

2 Did you at any time prior to January 1, 1980, warn any  
3 labor union representing ship workers, mechanics or others  
4 working with or exposed to asbestos containing products, of any  
5 potential health hazard from the use of insulation products  
6 containing asbestos?

7 RESPONSE TO INTERROGATORY NO. 62:

8 OCF states that it has warned labor unions representing  
9 ship workers, mechanics, or others working with or exposed to  
10 asbestos-containing products of potential health effects from the  
11 use of insulation products containing asbestos. See general  
12 objections.

13 INTERROGATORY NO. 63:

14 If the answer to the preceding Interrogatory is in the  
15 affirmative, please state:

- 16 a. The name of the union.  
17 b. How said union was informed.  
18 c. The date and place of said information or warning.  
19 d. The content and nature of said warning.  
20 e. The individual or individuals warned.

21 RESPONSE TO INTERROGATORY NO. 63:

22 Without waiving its general objections, OCF states as  
23 follows:

- 24 a. The names of the unions are the International  
25 Association of Heat and Frost Insulators and  
26 Asbestos Workers, and the Glass Bottle Blowers.  
27 b. OCF attempted to discuss the then-known health  
28 problems with the president of the Union. Also,

1 meetings of the Union and management were held at  
2 the Berlin plant and at special presentations by  
3 management to the employees to discuss those  
4 health hazards.

5 c. The meeting between OCF and the president of the  
6 International Association of Heat and Frost  
7 Insulators and Asbestos Workers took place in the  
8 Union offices in Washington, D.C. The exact date  
9 of this meeting is unknown. However, OCF  
10 believes it was before 1972. As to the meeting  
11 with the Glass Bottle Blowers, OCF refers  
12 Plaintiff to its historical documents which have  
13 been or will be made available for inspection to  
14 Plaintiff's counsel upon request.

15 d. OCF refers Plaintiff to its Response to paragraph  
16 (b) of this Interrogatory and to its historical  
17 documents which have been or will be made  
18 available to Plaintiff's counsel.

19 e. OCF refers Plaintiff to its Response to paragraph  
20 (b) of this Interrogatory. Also, in 1971, OCF  
21 presented an educational program to its Berlin,  
22 New Jersey, plant employees regarding the  
23 potential hazards of exposure to asbestos dust.  
24 In November, 1978, OCF effected a Respirator  
25 Program, complete with instructions to employees  
26 in its Bloomington, Illinois, plant.

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1 INTERROGATORY NO. 64:

2 State the name of all persons who have acted in the  
3 capacity of medical librarian for you from 1930 to January 1,  
4 1978, give their current address, telephone number and current  
5 position with the company.  
6

7 RESPONSE TO INTERROGATORY NO. 64:

8 Without waiving its general objections, OCF states that  
9 F. Lichtenberg maintained OCF's medical and industrial hygiene  
10 libraries from April 1, 1975, to March 1, 1977. S. Fansler  
11 maintained the libraries from March 1, 1977, to November, 1987.  
12 F. Lichtenberg and S. Fansler are no longer employed by OCF.

13 INTERROGATORY NO. 65:

14 State whether you ever subscribed to or received copies  
15 of the Asbestos Worker magazine and state the years of  
16 subscription or receipt of this magazine.

17 RESPONSE TO INTERROGATORY NO. 65:

18 Without waiving its general objections, OCF states that  
19 to the best of its knowledge, it did not subscribe to Asbestos  
20 Worker magazine, but OCF may have received individual copies.

21 INTERROGATORY NO. 66:

22 Please state whether you subscribe to the Asbestos  
23 magazine, and list the inclusive dates of your subscription.

24 RESPONSE TO INTERROGATORY NO. 66:

25 Without waiving its general objections, OCF states that  
26 to the best of its knowledge, it first subscribed to the Asbestos  
27 magazine in June, 1971, although OCF may have received individual  
copies before 1971.

///

1 Industrial Hygienist, Owens-Corning Fiberglas Corporation,  
2 Fiberglas Tower, Toledo, Ohio 43659. OCF communicated the  
3 results of the studies to its Contracting Division. OCF ceased  
4 the manufacture of asbestos-containing insulation in November,  
5 1972, and the sale of such products in early 1973. OCF refers  
6 Plaintiff to Exhibit "T". Additionally, OCF refers Plaintiff to  
7 its historical documents which have been or will be made  
8 available for inspection to Plaintiff's counsel upon request.

9 INTERROGATORY NO. 69:

10 At any time prior to 1964, were any tests or studies  
11 conducted or sponsored by you to determine:

12 a. the level of dust or fiber concentrations incident  
13 to:

14 i. cutting or sawing your insulation products  
15 containing asbestos.

16 ii. in placing the product on (1) pipes; (2)  
17 boilers;

18 iii. tearing down the product during repair and  
19 maintenance functions;

20 iv. mixing asbestos containing products.

21 b. Whether long term (20 years or more) exposure to  
22 insulation products containing 15% asbestos or  
23 less for work periods less than 8 hours a day,  
24

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26 ///



1. both indoors and outdoors, which resulted in the  
2. liberation of asbestos dust or fiber below 5  
3. million particle per cubic foot (MPPCF) might  
4. cause asbestosis or expose such worker to an  
5. increased statistical risk of contracting:

6. i. bronchogenic cancer;  
7. ii. mesothelioma (pleural or peritoneal);  
8. iii. gastrointestinal cancer.

9. RESPONSE TO INTERROGATORY NO. 69:

10. Without waiving its general objections, OCF states that  
11. to the best of its knowledge it did not conduct or sponsor tests  
12. to determine the level of dust or fiber concentration incident to  
13. cutting, sawing, applying, or removing its products, other than  
14. as described in OCF's Response to Interrogatory No. 68.

15. Additionally, to the best of OCF's knowledge it did not  
16. conduct or sponsor studies to determine "whether long-term  
17. exposure to insulation products containing 15% asbestos or less,  
18. for work periods less than eight hours a day, both indoors and  
19. outdoors, which resulted in liberation of asbestos dust or fiber  
20. below five million particles per cubic foot (MPPCF) might cause  
21. asbestosis or expose a worker to an increased statistical risk of  
22. contracting bronchogenic cancer, pleural or peritoneal  
23. mesothelioma, or gastrointestinal cancer."

24. INTERROGATORY NO. 70:

25. State the date and the source from which you received  
26. your first notice and awareness of TLV's pertaining to the  
27. concentration of airborne asbestos fibers.  
28.

///

1                   RESPONSE TO INTERROGATORY NO. 70:

2                   Without waiving its general objections, OCF states it  
3 is aware of the Threshold Limit Value (TLV) for exposure to  
4 asbestos dust recommended by the American Conference of  
5 Governmental Industrial Hygienists (ACGIH). OCF knows that from  
6 1946 to 1970, the ACGIH adopted a TLV of five million particles  
7 per cubic feet of air (MPPCF); however, OCF does not know what  
8 year it was first advised or made aware of such standards.

9                   The information from ACGIH is as readily available to  
10 Plaintiff as it is to OCF.

11                   INTERROGATORY NO. 71:

12                   Between 1930 and 1978, did you hear from any source of  
13 an alleged association between asbestos exposure and the  
14 development of cancer, asbestosis and pulmonary disease?

15                   RESPONSE TO INTERROGATORY NO. 71:

16                   Without waiving its general objections, OCF states that  
17 it did become aware of an alleged association between asbestos  
18 exposure and the development of cancer, asbestosis, and pulmonary  
19 disease.

20                   INTERROGATORY NO. 72:

21                   State when your knowledge as to the alleged association  
22 between the inhalation of asbestos fibers and contraction of  
23 cancer and asbestosis was first acquired, and state the source of  
24 that information.

25                   RESPONSE TO INTERROGATORY NO. 72:

26                   Without waiving its general objections, OCF states that  
27 it is now aware of medical literature associating various health  
28 problems with the inhalation of asbestos fibers. There was no

1 specific date on which OCF became aware of the relationship  
2 between exposure to asbestos fibers or dust and various health  
3 hazards. Likewise, there was no specific date on which OCF  
4 became aware of the relationship between exposure to Kaylo dust  
5 and various health hazards. The knowledge of that relationship  
6 was developed over a considerable period of time.  
7

8 In the early 1940s, some of OCF's employees became  
9 aware of potential health hazards associated with the inhalation  
10 of large concentrations of asbestos fibers in the asbestos  
11 textile manufacturing industry.

12 In 1953, OCF began to distribute Kaylo, a hydrous  
13 calcium silicate reinforced with asbestos, which was manufactured  
14 by OI. OCF began to manufacture the product in 1958, when it  
15 purchased the Berlin, New Jersey, plant from OI.

16 In 1956, prior to the acquisition of the Kaylo  
17 manufacturing plant, OCF inquired into the information that OI  
18 had regarding the health aspects of the OI Kaylo product. OCF  
19 was informed that a study completed by Saranac Lake Laboratories  
20 and published in 1955 showed that animals, if exposed for a  
21 prolonged period of time to high concentrations of Kaylo dust,  
22 could develop a mild asbestotic reaction. However, OCF was  
23 informed at the same time that experience in the manufacturing  
24 plants, including x-ray results, revealed no lung changes of any  
25 kind that could be attributed to occupational exposure to Kaylo.

26 Other documents, presumably received from OI around the  
27 time of the acquisition, informed OCF that OI had concluded,  
28 based upon its experience in the factories and the field as well

///

1 as its consideration of the Saranac report, that the actual  
2 health hazard to Kaylo handlers was small.

3 It was not until 1964 that OCF was made aware of new  
4 developments concerning the potential hazards of asbestos  
5 insulating materials. It was at this time that Dr. Irving  
6 Selikoff had published several articles on the hazards associated  
7 with asbestos-containing insulation material. Certain OCF  
8 employees questioned the application of these articles to Kaylo,  
9 as they related to prolonged use and exposure to  
10 asbestos-containing insulating materials and potential lung  
11 disease. OCF employees felt that Kaylo, a calcium silicate,  
12 could not have been involved to any appreciable extent in the  
13 studies because the studies involved men who had entered the  
14 insulation trade before 1943, and Kaylo had not yet been marketed  
15 in 1943. In addition, the fact that the asbestos in Kaylo was  
16 altered physically and chemically during the autoclaving process  
17 raised a question as to whether or not the alteration changed the  
18 cancer-inducing tendencies of the original asbestos.

19 As of the mid-1960s, no Workers' Compensation cases had  
20 been filed by employees of the Berlin, New Jersey, Kaylo  
21 manufacturing plant. In October, 1966, certain OCF employees  
22 were advised that a Worker's Compensation case alleging lung  
23 damage due to the handling of Kaylo had been filed by an  
24 insulation worker in Massachusetts.

25 Shortly thereafter, notwithstanding the fact that there  
26 was still doubt among certain employees as to whether Kaylo could  
27 cause lung disease, OCF decided to place labels on the Kaylo  
28

1                   It was not until 1969 that the first case of lung  
2 disease at the Berlin plant was diagnosed.

3 INTERROGATORY NO. 73:

4                   Do you subscribe to the United States Public Health  
5 Bulletin Service? If so, please state the date when you first so  
6 subscribed to the Public Health Service Bulletin.

7 RESPONSE TO INTERROGATORY NO. 73:

8                   Without waiving its general objections, OCF states that  
9 it does not subscribe to the United States Public Health  
10 Bulletin.

11 INTERROGATORY NO. 74:

12                   Please state the date when, if ever, you first notified  
13 your employees working in your manufacturing plants and factories  
14 as to the need to wear and use respirators.

15 RESPONSE TO INTERROGATORY NO. 74:

16                   Without waiving its general objections, OCF states that  
17 to the best of its information, respirators have always been  
18 available in its asbestos manufacturing plants since the  
19 acquisition of its Berlin, New Jersey, plant in 1958, and its  
20 Bloomington, Illinois, plant in April, 1970. On November 17,  
21 1970, OCF initiated a program which required the use of  
22 respirators in its Bloomington, Illinois, plant and which  
23 provided detailed instructions to employees. When OCF purchased  
24 the Berlin, New Jersey, plant from OI in 1958, OI had a  
25 respirator program in place. OCF continued this respirator  
26 program and supplemented employees' knowledge with an Educational  
27 Program in 1971. OCF refers Plaintiff to Exhibit "U".  
28

1  
2 INTERROGATORY NO. 75:

3 Please state the date when you first notified asbestos  
4 workers applying your asbestos insulation products as to the need  
5 to wear and use respirators.

6 RESPONSE TO INTERROGATORY NO. 75:

7 Without waiving its general objections, OCF refers  
8 Plaintiff to its Responses to Interrogatories No. 27 and 29(a)  
9 and to Exhibits "A", "B", "C", "D", "E", and "F".

10 INTERROGATORY NO. 76:

11 Have you ever published bulletins warning your  
12 employees concerning the hazards of inhaling asbestos and coming  
13 into contact with your asbestos containing products? If so,  
14 describe sufficiently for purposes of a notice to produce all  
15 such bulletins.

16 RESPONSE TO INTERROGATORY NO. 76:

17 Without waiving its general objections, OCF states that  
18 to the best of its knowledge, OCF did not publish bulletins  
19 directed toward either its Berlin, New Jersey, or Bloomington,  
20 Illinois, plant employees. OCF refers Plaintiff to its Responses  
21 to Interrogatories No. 27 and 74 and to Exhibits "A" and "U".

22 INTERROGATORY NO. 77:

23 Have any of your officers, agents, servants or  
24 employees ever testified before any governmental body regarding  
25 the possible harmful effects of asbestos exposure? If so, please  
26 state:

- 27 a. When and where such testimony was given.  
28 b. A summary of said testimony.

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INTERROGATORY NO. 80:

Has the deposition of any corporate official ever been taken in regard to asbestos-related civil claims and/or civil litigation?

RESPONSE TO INTERROGATORY NO. 80:

Without waiving its general objections, OCF states that the deposition of corporate officials have been taken in regard to asbestos related civil claims and/or civil litigation.

INTERROGATORY NO. 81:

If your answer to the preceding Interrogatory is in the affirmative, please state:

- a. Where such deposition(s) were taken.
- b. When such deposition(s) were taken.
- c. Who was present at the taking of said deposition(s).
- d. Whether said corporate officer ever signed any of said depositions. If so state which depositions, and when each was signed.
- e. The description of each document produced at said deposition, and the present custodians thereof.
- f. With respect to each such document described in subpart (e), please state whether you have admitted the authenticity of any of said documents in any jurisdiction in any litigation. If so, please set forth case name, case number and jurisdiction.
- g. With respect to each such document described in

1  
2 c. If said testimony was recorded, and if so, attach  
3 a copy to the answer to these Interrogatories.

4 RESPONSE TO INTERROGATORY NO. 77:

5 Without waiving its general objections, OCF states that  
6 to the best of its present knowledge, no employees of OCF have  
7 ever testified before any governmental body regarding the  
8 possible harmful effects of asbestos exposure.

9 INTERROGATORY NO. 78:

10 State whether you ever employed an individual named in  
11 your Response to Interrogatory No. 80 below.

12 RESPONSE TO INTERROGATORY NO. 78:

13 Without waiving its general objections, OCF states that  
14 Interrogatory No. 80 did not ask OCF to name an individual.

15 INTERROGATORY NO. 79:

16 If your answer to Interrogatory No. 78 is in the  
17 affirmative, please state:

- 18 a. All jobs or job titles held by said individual,  
19 and the inclusive dates of each.  
20 b. All duties and responsibilities relating to each  
21 such job or job title.  
22 c. Said individual's immediate superior in each such  
23 job or job title.

24 RESPONSE TO INTERROGATORY NO. 79:

25 Without waiving its general objections, OCF states that  
26 its Response to Interrogatory No. 78 is not in the affirmative;  
27 therefore, this interrogatory is inapplicable to OCF.  
28



1 stipulated to the authenticity of any of said  
2 documents in your jurisdiction and any  
3 litigation. If so, please set forth case name,  
4 case number and jurisdiction.

5 RESPONSE TO INTERROGATORY NO. 81:

6 See general objections.

7 INTERROGATORY NO. 82:

8 Do you presently have in your possession any document  
9 containing the signature or handwritten initials of the  
10 corporate officials listed in interrogatory No. 80 above? If  
11 so, please describe each such document(s) in sufficient detail  
12 as to satisfy the requirements of a subpoena duces tecum.

13 RESPONSE TO INTERROGATORY NO. 82:

14 Without waiving its objections, OCF states that it did  
15 not list any corporate officials in its Response to  
16 Interrogatory No. 80; therefore, this Interrogatory is  
17 inapplicable to OCF.

18 INTERROGATORY NO. 83:

19 Do you have in your possession any document(s)  
20 containing the name of the corporate officials listed in  
21 interrogatory NO. 80 above? If so, please describe each such  
22 document(s) in sufficient detail as to satisfy the requirements  
23 of a subpoena [sic] duces tecum.

24 RESPONSE TO INTERROGATORY NO. 83:

25 Without waiving its general objections, OCF refers  
26 Plaintiff to its Response to Interrogatory No. 82.

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2 INTERROGATORY NO. 84:

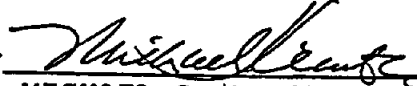
3 Do you have in your possession any exemplar or  
4 exemplars of the handwriting of the corporate officials listed  
5 in interrogatory No. 80 above? If so, please describe each such  
6 document(s) in sufficient detail as to satisfy the requirements  
7 of a subpoena [sic] duces tecum.

8 RESPONSE TO INTERROGATORY NO. 84:

9 Without waiving its objections, OCF refers Plaintiff  
10 to its Response to Interrogatory No. 82.

11 DATED: 6-30-89

12 WRIGHT, ROBINSON, McCAMMON,  
13 OSTHIMER & TATUM

14 By   
15 MICHAEL J. LEMBKE  
16 Attorneys for Defendant,  
17 OWENS-CORNING FIBERGLAS  
18 CORPORATION  
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UCL EXHIBIT 21  
= NO DATE AVAILABLE

CHRONOLOGICAL INDEX

1935

Effects of the Inhalation of Asbestos Dust on the  
Lungs of Asbestos Workers Public Health Reports  
Vol. 60, No. 1, January 1935

A. J. Lanza  
William J. McDonnell  
J. William Fehnel

CHRONOLOGICAL INDEX

1946

DATE Received  
1/15/82

A Health Survey of Pipe Covering Operations in Con-  
structing Naval Vessels Journal of Industrial  
Hygiene and Toxicology Vol. 28, No. 1 Jan. 1946

Walter E. Fleische  
Frederick J. Viles  
Robert L. Gade  
Philip Drinker

"A Study of Asbestosis  
in the Gabeston  
Textile Industry"

Dreesen, Bullwinkel,  
Edwards, Millard  
Jensen, Pub. Health  
Bull. No. 241 (1938)

Received by OCF  
Medical Services  
1/15/82

CHRONOLOGICAL INDEX

Asbestos Reprints

1957

*DATE RECEIVED  
UNKNOWN*

Pulmonary Tumors in Mice Exposed to Asbestos Dust

Kenneth M. Lynch, MD  
Forde A. McIver, MD  
James R. Cain, MD

CHRONOLOGICAL INDEX

Asbestos Reprints

1960

ATE RECEIVED  
UNKNOWN

Asbestosis and Carcinoma of the Lung  
(Case Report and Review of the Literature)

John Anderson, MD  
Francis A. Campagna, MD

2 ER-D  
3-4-77

Diffuse Pleural Mesothelioma and Asbestos  
Exposure in the North Western Cape Province  
(From Brit. J. Industr. Med., 1960 17, 260)

J. C. Wagner  
C. A. Sleggs  
Paul Marchand



CHRONOLOGICAL INDEX

Asbestos Reprints

1961

DATE RECEIVED  
UNKNOWN

Health Progress in an Asbestos Textile Works

Jerry Mitchell

CHRONOLOGICAL INDEX

Asbestos Reprints

1964

ATC REC'D  
UNKNOWN

Asbestos Exposure and Neoplasia

Irving Selikoff, MD  
Jacob Churg, MD  
E. Cuyler Hammond, DSc

ATC REC'D  
UNKNOWN

Cardiopulmonary Function Studies in Workers  
Dealing with Asbestos and Glasswool

J. Bjure  
B. Soderholm  
J. Widimsky

ATC REC'D  
UNKNOWN

Peritoneal Tumors in Asbestosis  
Brit J. industr. Med., 1964, 21, 20

J. B. Enticknap  
W. J. Smither

CHRONOLOGICAL INDEX

Asbestos Reprints

1965

DATE RECID  
UNKNOWN

Relation Between Exposure to Asbestos and  
Mesothelioma

Irving Selikoff, MD  
Jacob Churg, MD  
E. C. Hammond, DSc

DATE RECID  
UNKNOWN  
7-27-65

Asbestos Bodies in Human Lungs at Autopsy

Dzidra Cauna, MD  
Robert S. Totten, MD  
Paul Gross, MD

DATE RECID  
UNKNOWN

Mesothelioma of Pleura and Peritoneum  
Following Exposure to Asbestos in the  
London Area

Muriel L. Newhouse  
Hilda Thompson

DATE RECID  
UNKNOWN

Tests For Carcinogenicity of Asbestos

Wm. E. Smith  
Llonas Miller  
R. E. Elsasser  
D. D. Hubert

DATE RECID  
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Asbestosis and Pulmonary Carcinoma

Frank R. Dutra, MD  
John D. Carney, MD

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The Occurrence of Asbestosis Among Insulation  
Workers in the United States

I. J. Selikoff  
J. Churg  
E. C. Hammond

DATE RECID  
UNKNOWN

Neoplasia Among Insulation Workers in the United  
States With Special Reference To Intra-Abdominal  
Neoplasia

E. C. Hammond  
I. J. Selikoff  
J. Churg