

**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**In Re: Asbestos Product Liability  
Litigation (No. VI)**

**Civil Action No. MDL 875**

**SPECIAL BANKRUPTCY TRUST INTERROGATORIES, REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSIONS TO  
PLAINTIFFS**

Pursuant to Federal Rules of Civil Procedure 33, 34, and 36, Defendants requests that Plaintiffs provide sworn answers to the following Special Bankruptcy Trust Interrogatories, Requests for Production of Documents of Documents and Requests for Admission within thirty (30) days.

**INSTRUCTIONS AND DEFINITIONS**

1. "You," "Your," and "Yours," means Plaintiff, Plaintiff's Decedent and any other immediate family members and counsel for Plaintiff.
2. These requests seek answers based on all information available to you, however it was obtained, and any and all information in your actual or constructive possession or knowledge, or in the actual or constructive possession or knowledge of your attorneys, agents or representatives.
3. "Document" means any matter which is written, recorded, or graphic, including originals, copies of originals, and prior drafts, whether produced, reproduced, or stored in any manner, including but not limited to paper, film, tapes, belts, disks, computer devices, or any other information storage system available to you, or any other tangible item.

"Document" shall also include all non-identical copies of a document, such as copies of a document bearing handwritten notations.

4. When used in connection with a person, "identify" means to state that person's full name, current or last known residential and business addresses, current or last known residential and business telephone numbers, current or last known job title and place of employment, and, if known, whether the person is living or deceased.
5. When used in connection with a document, "identify" means to state with respect to each such document: the nature and substance thereof, the date it bears, the date it was prepared, the identity or identities of the author or authors thereof, the identity of each addressee, the identity or identities of the present custodian or custodians thereof, and the present location of the document.
6. When used in reference to any act, occurrence, occasion, transaction, or conduct, "identify" means to describe such act, occurrence, occasion, transaction or conduct, and state the date and place thereof and the identity of the person or persons participating, present, or involved therein.
7. The term "communication" shall mean any spoken or written exchange of thoughts or ideas to or from another person or governmental, corporate, non-profit, or academic entity, whether person-to-person, in a group, in a meeting, by telephone, by letter, by telegram, by telegraph, by telex, by e-mail or by any other process, electronic or otherwise, including without limitation any tape recordings or any written, printed, typed, or other readable documents, correspondence, facsimiles, memos, reports, contracts, diaries, logbooks, minutes, notes, studies, surveys, forecasts, graphic representations or symbols.

8. The singular form of a word shall be interpreted as a plural as well. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any information which might otherwise be construed to be outside its scope.
9. If you assert any privilege as to any information responsive to these requests, describe the subject matter and date of the information, the type of document (if any) containing the information, all person(s) giving and all person(s) receiving the information, and the ground(s) upon which you allege that the information is privileged or otherwise protected from discovery. If you assert a privilege with respect to a part of the request, respond to the remainder of the request and furnish all information over which you are not claiming the privilege. In addition, please supply a privilege log for all requests which you assert are privileged, stating the basis for your assertion that the information requested is privileged.
10. If any of these requests cannot be answered by you in full, answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information, knowledge or belief you do have concerning the unanswered portion. Where a partial admission or denial is appropriate, admit those portions of the request that can be admitted.
11. The terms "relate," "regard" and "refer," "relating to," "regarding" and "referring to" shall mean, in addition to their customary and usual meaning, evidence, consists, embody, contain, mention, describe, discuss, criticize, contradict, is based upon, pertain, constitute, reflect or connect in any logical or factual way with the referenced manner.

12. The term "exposed," "exposure," and "expose" shall mean having worked with, or being around others working with, the product(s) when dust was created from the manipulation of the product to such an extent that dust from the product was inhaled.
13. The term "asbestos" shall mean the fiber, fibers, fiber bundles of any of the minerals classified as "amphibole" (including crocidolite (blue asbestos), amosite (brown asbestos), tremolite, actinolite, and anthophyllite), or "serpentine" (chrysotile (white asbestos)).
14. The term "524(g) Trust" shall mean any entity, organization, company, trust, fund, claims process, and or claims management company formed, or operating pursuant to Section 524(g) of Chapter 11 of the United States Bankruptcy Code. "Bankrupt Entity" and "Bankrupt Entities" means any company or other entity (including parent and subsidiary companies, predecessors and successors in interest) who is a party or non-party potential tortfeasor whose Asbestos-Containing Product or Material may have contributed in any manner to plaintiff(s) or to plaintiff's decedent's exposure to asbestos and has filed for protection from creditors under Chapter 11 of the U.S. Bankruptcy Code. Bankrupt Entity shall include all trusts established or currently contemplated pursuant to Chapter 11 of the U.S. Bankruptcy Code, any administrative or claims processing organization established thereto, the unsecured creditors committees, the trustee in any such proceeding, and any submissions to or declarations of the bankruptcy court. Bankrupt Entity shall include all entities, without limitation, listed on Exhibit A, which list may be supplemented from time-to-time, as necessary.
15. "Claim against Bankrupt Entity" includes, but is not limited to, any actual or stayed legal action, any proof of claim, trust claim, claims resolution, arbitration claim, liquidated

claim, unliquidated claim; demand for payment, for remedy, of liability; demand reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, equitable, secured or unsecured, toxic personal injury claims, personal injury trust claims, or any kind of claim for payment of which you have filed against bankrupt entities or their parent companies, successor companies or subsidiary companies.

### **INTERROGATORIES**

1. Identify every lawyer, including any referring lawyers, or entities that have filed, or retained the right to file, a lawsuit or claim for compensation against any company, Bankrupt Entity, and/or 524(g) Trust based on Plaintiff's or Plaintiff's Decedent's alleged exposure to asbestos.

**ANSWER:**

2. Have you filed any claim for compensation with any 524(g) Trust or Bankrupt Entity as a result of your alleged exposure to asbestos?

**ANSWER:**

3. If the answer to Interrogatory Number 2 is anything other than "No," state whether you have made, filed, or submitted a claim with or against any 524(g) Trust or other Bankrupt Entity seeking compensation for any alleged injury related to Plaintiff's asbestos or silica exposure. For each claim state the following:

- (a) the full identity of each entity and/or 524(g) Trust with or against whom such claim was made or filed, and the date where each such claim was made;
- (b) the name and nature of the entity with which the claim was made;
- (c) any identifying number, such as a docket, file, or petition number, for each claim;
- (d) the amount, if any, paid or agreed to be paid, in compensation for the claim of the plaintiff/decedent;
- (e) the nature of and basis for the claim; and

- (f) the current status of the claim (*i.e.*, pending, approved, deferred, rejected, etc.).

**ANSWER:**

4. With regard to any claim for compensation for injury allegedly due to Plaintiff or Plaintiff's Decedent's exposure to asbestos or silica which you have made or filed with any Bankrupt Entity or any 524(g) Trust, identify:

- (a) the full identity of each entity and/or 524(g) Trust against whom such claim(s) was made;
- (b) the basis for such claim(s); and
- (c) the date you or anyone on your behalf made such claim(s).

**ANSWER:**

5. Do you contend that the only asbestos-containing products to which Plaintiff or Plaintiff's Decedent was exposed during his or her life are those products manufactured by the companies or entities that have been sued in this action?

**ANSWER:**

6. Do you contend that you are entitled to compensation from one or more Bankrupt Entity and/or 524(g) Trust as a result of Plaintiff's or Plaintiff's Decedent's alleged exposure to asbestos?

**ANSWER:**

7. Have you, or any agent or attorney on your behalf, deferred, or requested to defer, any claim for compensation with any 524(g) Trust or Bankrupt Entity?

**ANSWER:**

8. Were you or your decedent ever screened or evaluated for an asbestos-related disease?

**ANSWER:**

9. If the answer to Interrogatory No. 8 is yes, identify:

- (a) the date and location of such screening or evaluation;
- (b) the entity that conducted the screening or evaluation;
- (c) the physician(s) that interpreted the findings; and
- (d) the name of the entity that set-up, coordinated, and/or financed the screening or evaluation.

**ANSWER:**

10. Have you received any compensation as a result of a pre-packaged bankruptcy plan executed by any entity?

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Produce true and correct copies of all documents, records or claim forms submitted to any Bankrupt Entity and/or 524(g) Trust to make or support a claim for compensation for any alleged injury related to Plaintiff's or Plaintiff's Decedent's asbestos or silica exposure, including all records, claim forms and documents submitted with or in support of each claim, including without limitation medical reports, affidavits, transcripts and interrogatory responses or similar documents.

**RESPONSE:**

2. Produce any and all correspondence to any Bankrupt Entity and/or 524(g) Trust sent from you, or on your behalf.

**RESPONSE:**

3. Produce any document, record, form, affidavit, certification, or application signed by Plaintiff or Plaintiff's Decedent which has been deferred, or not yet submitted to a 524(g) Trust or Bankrupt Entity.

**RESPONSE:**

4. Produce any documents relating to Interrogatory No. 9.

**RESPONSE:**

5. Produce any documents relating to Interrogatory No. 10.

**RESPONSE:**

## REQUESTS FOR ADMISSION

1. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Johns-Manville.

**RESPONSE:**

2. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Johns-Manville, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Johns-Manville was a contributing cause of his or her alleged disease.

**RESPONSE:**

3. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Celotex.

**RESPONSE:**

4. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Celotex, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Celotex was a contributing cause of his or her alleged disease.

**RESPONSE:**

5. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Keasby-Mattison.

**RESPONSE:**

6. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Keasby-Mattison, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Keasby-Mattison was a contributing cause of his or her alleged disease.

**RESPONSE:**

7. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Mundet.

**RESPONSE:**

8. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Mundet, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Mundet was a contributing cause of his or her alleged disease.

**RESPONSE:**

9. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Philip Carey.

**RESPONSE:**

10. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Philip Carey, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Philip Carey was a contributing cause of his or her alleged disease.

**RESPONSE:**

11. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by UNARCO (a/k/a Union Asbestos and Rubber Company).

**RESPONSE:**

12. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by UNARCO (a/k/a Union Asbestos and Rubber Company), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by UNARCO (a/k/a Union Asbestos and Rubber Company) was a contributing cause of his or her alleged disease.

**RESPONSE:**

13. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Armstrong.

**RESPONSE:**

14. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Armstrong, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Armstrong was a contributing cause of his or her alleged disease.

**RESPONSE:**

15. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Ruberoid.

**RESPONSE:**

16. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Ruberoid, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Ruberoid was a contributing cause of his or her alleged disease.

**RESPONSE:**

17. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Carey.

**RESPONSE:**

18. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Carey, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Carey was a contributing cause of his or her alleged disease.

**RESPONSE:**

19. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Pittsburgh Corning Corporation.

**RESPONSE:**

20. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Pittsburgh Corning Corporation, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Pittsburgh Corning Corporation was a contributing cause of his or her alleged disease.

**RESPONSE:**

21. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Fibreboard.

**RESPONSE:**

22. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Fibreboard, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Fibreboard was a contributing cause of his or her alleged disease.

**RESPONSE:**

23. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by T&N (Turner & Newell).

**RESPONSE:**

24. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by T&N (Turner & Newell), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by T&N (Turner & Newell) was a contributing cause of his or her alleged disease.

**RESPONSE:**

25. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Baldwin-Ehret Hill.

**RESPONSE:**

26. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Baldwin-Ehret Hill, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Baldwin-Ehret Hill was a contributing cause of his or her alleged disease.

**RESPONSE:**

27. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Nicolet.

**RESPONSE:**

28. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Nicolet, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Nicolet was a contributing cause of his or her alleged disease.

**RESPONSE:**

29. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Plant (a/k/a Plant Rubber & Asbestos Works).

**RESPONSE:**

30. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Plant (a/k/a Plant Rubber & Asbestos Works), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos

fibers from products manufactured and/or sold by Plant (a/k/a Plant Rubber & Asbestos Works) was a contributing cause of his or her alleged disease.

**RESPONSE:**

31. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Keene Corporation.

**RESPONSE:**

32. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Keene Corporation, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Keene Corporation was a contributing cause of his or her alleged disease.

**RESPONSE:**

33. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by GAF.

**RESPONSE:**

34. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by GAF, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by GAF was a contributing cause of his or her alleged disease.

**RESPONSE:**

35. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by H.K. Porter.

**RESPONSE:**

36. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by H.K. Porter, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by H.K. Porter was a contributing cause of his or her alleged disease.

**RESPONSE:**

37. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Southern Asbestos.

**RESPONSE:**

38. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Southern Asbestos, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Southern Asbestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

39. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Eagle-Picher.

**RESPONSE:**

40. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Eagle-Picher, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Eagle-Picher was a contributing cause of his or her alleged disease.

**RESPONSE:**

41. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Harbison-Walker Refractories Co.

**RESPONSE:**

42. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Harbison-Walker Refractories Co. admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Harbison-Walker Refractories Co. was a contributing cause of his or her alleged disease.

**RESPONSE:**

43. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Dresser Industries.

**RESPONSE:**

44. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Dresser Industries, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products

manufactured and/or sold by Dresser Industries was a contributing cause of his or her alleged disease.

**RESPONSE:**

45. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Owens-Corning Fiberglas.

**RESPONSE:**

46. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Owens-Corning Fiberglas, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Owens-Corning Fiberglas was a contributing cause of his or her alleged disease.

**RESPONSE:**

47. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Raymark (a/k/a Raymark Industries).

**RESPONSE:**

48. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Raymark (a/k/a Raymark Industries), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Raymark (a/k/a Raymark Industries) was a contributing cause of his or her alleged disease.

**RESPONSE:**

49. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Ehret Magnesia Manufacturing Company.

**RESPONSE:**

50. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Ehret Magnesia Manufacturing Company, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Ehret Magnesia Manufacturing Company was a contributing cause of his or her alleged disease.

**RESPONSE:**

51. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Combustion Engineering.

**RESPONSE:**

52. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Combustion Engineering, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Combustion Engineering was a contributing cause of his or her alleged disease.

**RESPONSE:**

53. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by A.P. Green.

**RESPONSE:**

54. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by A.P. Green, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by A.P. Green was a contributing cause of his or her alleged disease.

**RESPONSE:**

55. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Babcock & Wilcox.

**RESPONSE:**

56. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Babcock & Wilcox, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Babcock & Wilcox was a contributing cause of his or her alleged disease.

**RESPONSE:**

57. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by NARCO (North American Refractories).

**RESPONSE:**

58. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by NARCO (North American Refractories), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers

from products manufactured and/or sold by NARCO (North American Refractories) was a contributing cause of his or her alleged disease.

**RESPONSE:**

59. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by W.R. Grace.

**RESPONSE:**

60. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by W.R. Grace, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by W.R. Grace was a contributing cause of his or her alleged disease.

**RESPONSE:**

61. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by USG (United States Gypsum).

**RESPONSE:**

62. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by USG (United States Gypsum), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by USG (United States Gypsum) was a contributing cause of his or her alleged disease.

**RESPONSE:**

63. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Armstrong Cork Co.

**RESPONSE:**

64. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Armstrong Cork Co. admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Armstrong Cork Co. was a contributing cause of his or her alleged disease.

**RESPONSE:**

65. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Armstrong World Industries.

**RESPONSE:**

66. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Armstrong World Industries, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Armstrong World Industries was a contributing cause of his or her alleged disease.

**RESPONSE:**

67. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by U.S. Mineral Products Co.

**RESPONSE:**

68. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by U.S. Mineral Products Co., admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by U.S. Mineral Products Co. was a contributing cause of his or her alleged disease.

**RESPONSE:**

69. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Kaiser Aluminum.

**RESPONSE:**

70. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Kaiser Aluminum, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Kaiser Aluminum was a contributing cause of his or her alleged disease.

**RESPONSE:**

71. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Unibestos.

**RESPONSE:**

72. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Unibestos, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Unibestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

73. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Thermobestos.

**RESPONSE:**

74. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Thermobestos, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Thermobestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

75. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by PABCO.

**RESPONSE:**

76. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by PABCO, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by PABCO was a contributing cause of his or her alleged disease.

**RESPONSE:**

77. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Armabestos.

**RESPONSE:**

78. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Armabestos, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Armabestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

79. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Armatemp.

**RESPONSE:**

80. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Armatemp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Armatemp was a contributing cause of his or her alleged disease.

**RESPONSE:**

81. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Hi-Temp.

**RESPONSE:**

82. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Hi-Temp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Hi-Temp was a contributing cause of his or her alleged disease.

**RESPONSE:**

83. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by K-M.

**RESPONSE:**

84. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by K-M, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by K-M was a contributing cause of his or her alleged disease.

**RESPONSE:**

85. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by CELLOTONE.

**RESPONSE:**

86. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by CELLOTONE, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by CELLOTONE was a contributing cause of his or her alleged disease.

**RESPONSE:**

87. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by FEATHERWEIGHT.

**RESPONSE:**

88. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by FEATHERWEIGHT, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by FEATHERWEIGHT was a contributing cause of his or her alleged disease.

**RESPONSE:**

89. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Caltemp.

**RESPONSE:**

90. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Caltemp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Caltemp was a contributing cause of his or her alleged disease.

**RESPONSE:**

91. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by CAROCEL.

**RESPONSE:**

92. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by CAROCEL, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by CAROCEL was a contributing cause of his or her alleged disease.

**RESPONSE:**

93. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by EXCEL.

**RESPONSE:**

94. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by EXCEL, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by EXCEL was a contributing cause of his or her alleged disease.

**RESPONSE:**

95. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Eagle.

**RESPONSE:**

96. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Eagle, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Eagle was a contributing cause of his or her alleged disease.

**RESPONSE:**

97. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Atlas Asbestos.

**RESPONSE:**

98. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Atlas Asbestos,

admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Atlas Asbestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

99. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by EPITHERM.

**RESPONSE:**

100. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by EPITHERM, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by EPITHERM was a contributing cause of his or her alleged disease.

**RESPONSE:**

101. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Duplex.

**RESPONSE:**

102. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Duplex, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Duplex was a contributing cause of his or her alleged disease.

**RESPONSE:**

103. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Aircell.

**RESPONSE:**

104. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Aircell, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Aircell was a contributing cause of his or her alleged disease.

**RESPONSE:**

105. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Kaytherm.

**RESPONSE:**

106. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Kaytherm, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Kaytherm was a contributing cause of his or her alleged disease.

**RESPONSE:**

107. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Thermasil.

**RESPONSE:**

108. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Thermasil, admit

that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Thermasil was a contributing cause of his or her alleged disease.

**RESPONSE:**

109. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Thermolite.

**RESPONSE:**

110. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Thermolite, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Thermolite was a contributing cause of his or her alleged disease.

**RESPONSE:**

111. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by HYLO.

**RESPONSE:**

112. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by HYLO, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by HYLO was a contributing cause of his or her alleged disease.

**RESPONSE:**

113. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by K-12 calcium silicate.

**RESPONSE:**

114. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by K-12 calcium silicate, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by K-12 calcium silicate was a contributing cause of his or her alleged disease.

**RESPONSE:**

115. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by K-20 calcium silicate.

**RESPONSE:**

116. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by K-20 calcium silicate, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by K-20 calcium silicate was a contributing cause of his or her alleged disease.

**RESPONSE:**

117. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Air Cell.

**RESPONSE:**

118. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Air Cell, admit

that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Air Cell was a contributing cause of his or her alleged disease.

**RESPONSE:**

119. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by ASBESTOCEL.

**RESPONSE:**

120. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by ASBESTOCEL, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by ASBESTOCEL was a contributing cause of his or her alleged disease.

**RESPONSE:**

121. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by 85% Magnesia.

**RESPONSE:**

122. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by 85% Magnesia, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by 85% Magnesia was a contributing cause of his or her alleged disease.

**RESPONSE:**

123. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Superex.

**RESPONSE:**

124. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Superex, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Superex was a contributing cause of his or her alleged disease.

**RESPONSE:**

125. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Careytemp.

**RESPONSE:**

126. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Careytemp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Careytemp was a contributing cause of his or her alleged disease.

**RESPONSE:**

127. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Calsilite.

**RESPONSE:**

128. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Calsilite, admit

that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Calsilite was a contributing cause of his or her alleged disease.

**RESPONSE:**

129. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Kaiser.

**RESPONSE:**

130. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Kaiser, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Kaiser was a contributing cause of his or her alleged disease.

**RESPONSE:**

131. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Super Block.

**RESPONSE:**

132. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Super Block, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Super Block was a contributing cause of his or her alleged disease.

**RESPONSE:**

133. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Vee Block.

**RESPONSE:**

134. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Vee Block, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Vee Block was a contributing cause of his or her alleged disease.

**RESPONSE:**

135. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Enduro Pipecovering.

**RESPONSE:**

136. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Enduro Pipecovering, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Enduro Pipecovering was a contributing cause of his or her alleged disease.

**RESPONSE:**

137. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Enduro Block.

**RESPONSE:**

138. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Enduro Block, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products

manufactured and/or sold by Enduro Block was a contributing cause of his or her alleged disease.

**RESPONSE:**

139. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Monoblock.

**RESPONSE:**

140. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Monoblock, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Monoblock was a contributing cause of his or her alleged disease.

**RESPONSE:**

141. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Caltemp.

**RESPONSE:**

142. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Caltemp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Caltemp was a contributing cause of his or her alleged disease.

**RESPONSE:**

143. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Kamatt.

**RESPONSE:**

144. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Kamatt, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Kamatt was a contributing cause of his or her alleged disease.

**RESPONSE:**

145. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Hy-Temp.

**RESPONSE:**

146. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Hy-Temp, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Hy-Temp was a contributing cause of his or her alleged disease.

**RESPONSE:**

147. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Zebra.

**RESPONSE:**

148. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Zebra, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Zebra was a contributing cause of his or her alleged disease.

**RESPONSE:**

149. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by V-Dent.

**RESPONSE:**

150. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by V-Dent, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by V-Dent was a contributing cause of his or her alleged disease.

**RESPONSE:**

151. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Sal-Mo.

**RESPONSE:**

152. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Sal-Mo, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Sal-Mo was a contributing cause of his or her alleged disease.

**RESPONSE:**

153. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Pyrobestos.

**RESPONSE:**

154. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Pyrobestos, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Pyrobestos was a contributing cause of his or her alleged disease.

**RESPONSE:**

155. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Cafco.

**RESPONSE:**

156. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Cafco, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Cafco was a contributing cause of his or her alleged disease.

**RESPONSE:**

157. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Limpet.

**RESPONSE:**

158. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Limpet, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Limpet was a contributing cause of his or her alleged disease.

**RESPONSE:**

159. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Zonolite.

**RESPONSE:**

160. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Zonolite, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Zonolite was a contributing cause of his or her alleged disease.

**RESPONSE:**

161. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Insulag.

**RESPONSE:**

162. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Insulag, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Insulag was a contributing cause of his or her alleged disease.

**RESPONSE:**

163. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by GLATEX Asbestos Cement.

**RESPONSE:**

164. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by GLATEX Asbestos Cement, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by GLATEX Asbestos Cement was a contributing cause of his or her alleged disease.

**RESPONSE:**

165. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Monocote.

**RESPONSE:**

166. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Monocote, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Monocote was a contributing cause of his or her alleged disease.

**RESPONSE:**

167. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by KAOCAST.

**RESPONSE:**

168. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by KAOCAST, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by KAOCAST was a contributing cause of his or her alleged disease.

**RESPONSE:**

169. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by KAOCRETE.

**RESPONSE:**

170. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by KAOCRETE, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by KAOCRETE was a contributing cause of his or her alleged disease.

**RESPONSE:**

171. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by KAOLITE.

**RESPONSE:**

172. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by KAOLITE, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by KAOLITE was a contributing cause of his or her alleged disease.

**RESPONSE:**

173. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Super 711.

**RESPONSE:**

174. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Super 711, admit

that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Super 711 was a contributing cause of his or her alleged disease.

**RESPONSE:**

175. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Super 66.

**RESPONSE:**

176. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Super 66, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Super 66 was a contributing cause of his or her alleged disease.

**RESPONSE:**

177. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by One-Cote.

**RESPONSE:**

178. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by One-Cote, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by One-Cote was a contributing cause of his or her alleged disease.

**RESPONSE:**

179. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Super 48 (or Super Forty-Eight).

**RESPONSE:**

180. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Super 48 (or Super Forty-Eight), admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Super 48 (or Super Forty-Eight) was a contributing cause of his or her alleged disease.

**RESPONSE:**

181. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Weber's.

**RESPONSE:**

182. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Weber's, admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Weber's was a contributing cause of his or her alleged disease.

**RESPONSE:**

183. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Bondex International Inc.

**RESPONSE:**

184. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Bondex International Inc., admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Bondex International Inc. was a contributing cause of his or her alleged disease.

**RESPONSE:**

185. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Specialty Products Holding Corp.

**RESPONSE:**

186. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Specialty Products Holding Corp., admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Specialty Products Holding Corp. was a contributing cause of his or her alleged disease.

**RESPONSE:**

187. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Garlock Sealing Technologies, LLC.

**RESPONSE:**

188. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Garlock Sealing

Technologies, LLC., admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Garlock Sealing Technologies, LLC. was a contributing cause of his or her alleged disease.

**RESPONSE:**

189. Admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos from products manufactured and/or sold by Durabla Manufacturing Corp.

**RESPONSE:**

190. If you admit that Plaintiff or Plaintiff's Decedent claims or has claimed that he or she was exposed to asbestos fibers from products manufactured and/or sold by Durabla Manufacturing Corp., admit that Plaintiff or Plaintiff's Decedent's exposure to asbestos fibers from products manufactured and/or sold by Durabla Manufacturing Corp. was a contributing cause of his or her alleged disease.

**RESPONSE:**

## **EXHIBIT A**

Bankrupt Entity includes, without limitation:

UNR Industries, Inc.	Delaware Insulations
Cassiar Mines	Pittsburgh Corning
Skinner Engine Co.	A. P. Green Industries
Johns-Manville Co.	Celotex Corp.
Kentile Floors	Burns & Roe Enterprises
USG (US Gypsum) Corp.	Shook & Fletcher
Amatex Corp.	Hillsborough Holdings
Keene Corp.	E. J. Bartells
Federal Mogul	Atra Group, Inc. (Synkoloid)
Waterman Steamship Corp.	National Gypsum Co.
American Shipbuilding, Inc.	Owens Corning Fiberglas
Eastco Industrial Safety Corp.	AC and S, Inc.
Wallace & Gale Co.	Standard Asbestos Mfg. & Insul.
Lykes Brothers Steamship	Armstrong World Industries
Washington Group Int'l. Inc.	C. E. Thurston
Forty-Eight Insulations, Inc.	Eagle-Picher
Rock Wool Mfg.	G-1 Holdings (GAF Corp.)
Bethlehem Steel	H. K. Porter Co.
PACOR	W. R. Grace
SGL Carbon	Bondex International Inc.
North American Refractories	Specialty Products Holding Corp.
Prudential Lines, Inc.	Garlock Sealing Technologies LLC
M. H. Detrick	Durable Manufacturing Corp.
Kaiser Aluminum	
Standard Insulations, Inc.	
Brunswick Fabricators	
Plibrico Refractories	
US Lines	
Fuller-Austin Insulation	
Porter-Hayden	
Nicolet, Inc.	
Harnischfeger Corp.	
American Club	
Gatke Corp.	
Joy Technologies	
Huxley Development Corp.	
Chemetron Corp.	
Rutland Fire & Clay	
Harbison-Walker Refractories Co.	
Raytech	
Babcock & Wilcox	
Continental Producers Corp.	