

**PLAINTIFF'S STANDARD CASE-SPECIFIC INTERROGATORIES
TO ALL DEFENDANTS**

PROPOUNDING PARTY: Plaintiff

RESPONDING PARTY: Defendant _____

PREFACE

Unless otherwise specifically set forth herein, the DESCRIBED SITE(S) for which you must respond are those listed in PLAINTIFF'S notice sent to you to initiate your responses to these Interrogatories.

Any information provided by any DEFENDANT in answer to Standard Interrogatories need not be repeated in answer to these case-specific interrogatories, except that a DEFENDANT must provide more specific information which is responsive to a specific designation of a DESCRIBED SITE if not included in previous answers. (Thus, for example, a DEFENDANT which has responded to the Standard Interrogatories regarding a particular facility in general must provide such information as it has regarding the particular unit in the facility identified as a PLAINTIFF'S DESCRIBED SITE.)

Hospitals and other health care entity defendants shall provide responses related only to that defendant's physical facilities and shall not be required to disclose any information related to the furnishing of services to patients.

DEFINITIONS

1. "AREA(S)" or "IDENTIFIED WORK" means the contract or subcontract, specific structure, building, building number, floor of the building, ship, process line,

unit, piece of equipment or other specific place within each WORKSITE and PREMISES where PLAINTIFF worked and/or where the PLAINTIFF was exposed and/or the location that was the source of that exposure.

2. "ASBESTOS-CONTAINING PRODUCT(S)" shall mean a product(s) which this defendant knows or believes to have contained any amount of the mineral asbestos at any time.

3. "COMPANY" means any private enterprise including corporations, partnerships, joint ventures, and sole proprietorships.

4. A "CONTRACT UNIT" shall mean a branch, division, subsidiary or other affiliated entity of a DEFENDANT which has been or is now engaged in installation, disturbing or handling and/or removal of RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS.

5. "DESCRIBED SITES" means the PREMISES, JOBSITES, or WORKSITES, including, if available, AREAS of IDENTIFIED WORK.

6. "DOCUMENTS" means any writing, and includes the original or a copy of handwriting, typewriting, printing, photostating, photographing, computer printout, and every other means of recording upon any tangible thing or form of communication or representation including letters, words, pictures, sounds or symbols or combinations of them.

7. A request to "IDENTIFY" or to state the "IDENTITY" of a person or individual means to state his or her name, the place of employment, job title, present business or present or last known home address, years of employment and last known telephone number if not employed by DEFENDANT.

8. A request to IDENTIFY a "WRITING" or "DOCUMENT" or study shall

mean a request to either attach such an exhibit to your answers to these Interrogatories, or to describe such with sufficient particularity that it may be made the subject of a request for production of documents. YOUR description should include an indication of: (a) the author; (b) addressee(s); (c) date of origin; (d) the nature of the writing or document (e.g., letter, telephone memorandum, audio tape recording, photograph, etc.); and (e) its present location, name and present address of custodian thereof.

9. A request to "IDENTIFY" an oral communication shall mean a request to describe the communication with particularity, and shall include the following information; (a) the identity of all parties to the communication; (b) the identity of the person whom you contend initiated the communication; (c) the identity of all persons present at the time of the communication; and (d) the time, date and place of the communication.

10. A request to "IDENTIFY" or to state the "IDENTITY" of a person or individual means to state his or her name, the place of employment, job title, present business or present or last known home address, years of employment and last known telephone number if not employed by DEFENDANT.

11. A request to "IDENTIFY" the product shall mean a request to describe the product, the material or compound by the following means: (1) by nickname or slang name used in your industry and/or occupation; (2) by the name under which it is sold in the marketplace (trade name); and (3) by its generic name.

12. "JOBSITE(S)" or "WORKSITE(S)" means any location other than a PREMISES at which PLAINTIFF claims exposure to asbestos.

13. "MARKET" (MARK.ETing, MARKETed) shall mean the mining, supply, sale, labeling, distribution, importing, processing or manufacture of RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCT(S).

14. A request to describe the "NATURE" of a product means to describe the:

(a) color; (b) texture; (c) form (i.e., powder, liquid, paste, solid, board, cloth, blanket, wire insulation, etc.); (d) physical dimensions, if solid (length, width and height); (e) the type of shipping package and shipping package dimensions if not solid; (f) type of asbestos fiber used in the composition of the product (e.g., chrysotile, amosite, crocidolite); (g) the intended use or function of such product as recommended by this DEFENDANT as the miner, producer, supplier, contractor, manufacturer, distributor, owner or seller; and (h) the type of worksite in which it was intended to be used (e.g., shipyard, refinery, commercial building construction, manufacturing plant, home, power generating plant, etc.).

15. "PREMISES" includes, but is not limited to, buildings, refinery facilities, boilers, generators, tract housing, commercial buildings and other such structures.

16. "RAW ASBESTOS" means asbestos fiber mined or milled, either packaged or in bulk, not compounded with other substances and essentially pure with the exception of naturally occurring trace amounts of other substances.

17. "THIS DEFENDANT" (or "DEFENDANT") shall mean the named defendant herein, all of its divisions, alternate entities, predecessors in interest, and successors in interest.

18. "YOU" and "YOUR" refer to the DEFENDANT who is named above as responding party.

INTERROGATORIES

INTERROGATORY NO. 1 (For Contractor Defendants Only):

Did this DEFENDANT install, remove, disturb or handle or contract to have others do work which involved the installation, removal, disturbing or handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any DESCRIBED SITE? If so,

A. IDENTIFY every contract to which YOU were a party or to which any of YOUR contractor(s) or subcontractor(s) were parties (regardless of the degree of removal) involving work at the DESCRIBED SITE at or before the time designated in the notice. For each such contract:

1. IDENTIFY the parties to the contract;
2. Provide a description of the work to be performed by each party to the contract and a description of the DESCRIBED SITE where work was to be performed under the contract;
3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the performance of the contract;
4. IDENTIFY the person or entity from which the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS were obtained;
5. State the dates of the contract and the dates of performance;
6. IDENTIFY all records which identify persons who worked at the DESCRIBED SITE.

B. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

C. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

INTERROGATORY NO. 2 (To Manufacturer or Distributor Defendants only):

Were any of THIS DEFENDANTS RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS sold, shipped, MARKETED, or otherwise distributed either

to or for use at the DESCRIBED SITES at or before the time designated in the notice? If so:

A. IDENTIFY and state the NATURE and quantity of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS;

B. IDENTIFY to whom said RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS were sold;

C. IDENTIFY to whom said RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS were shipped;

D. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

E. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

INTERROGATORY NO. 3 (for Premises Defendants only):

Did YOU install, remove, handle or disturb RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any DESCRIBED SITE at or before the time designated in the notice? If so:

A. IDENTIFY the PREMISES.

B. For each of the PREMISES:

1. State the nature of your ownership or possessory interest;
2. State the inclusive date of that interest;
3. IDENTIFY the party from whom that interest was acquired;
4. IDENTIFY the party, if any, to whom that interest was transferred.

C. IDENTIFY every contract to which YOU were a party or of which YOU have knowledge wherein the performance of such contract involved the installation,

removal, disturbing or handling of any RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at YOUR PREMISES. For each such contract:

1. IDENTIFY the parties to the contract;
2. Provide a general description of the work to be performed by each party to the contract;
3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the performance of the contract;
4. State the dates of the contract and the dates of performance;

INTERROGATORY NO. 4 (Premises and Contractor Defendants Only):

At or before the time designated in the notice, did YOU require PLAINTIFF to wear a respirator or face mask? If so:

- A. IDENTIFY the individual(s) who communicated this requirement to the PLAINTIFF;
- B. State the date(s) this requirement was first communicated to the PLAINTIFF;
- C. State the means by which this requirement was communicated;
- D. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.
- E. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

INTERROGATORY NO. 5 (Premises Defendants Only):

Did YOU supply contractor or subcontractors with any tools or equipment to be used by contractors or subcontractors (or their employees) working in the AREA where

the PLAINTIFF worked at the DESCRIBED SITES during the installation, removal, handling or disturbing of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so, for each occasion:

- A. Describe the tools or equipment supplied;
- B. IDENTIFY to whom the tools or equipment were supplied;
- C. State the inclusive dates;
- D. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.
- E. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts

INTERROGATORY NO. 6:

Was air sampling ever conducted at any of the DESCRIBED SITES in which YOU had an ownership or possessory interest or where YOU performed services or where YOUR products were installed? If so, for each occasion:

- A. Describe why the sampling was conducted;
- B. Describe the results thereof;
- C. Set forth the dates on which said samplings were performed;
- D. Describe the location or locations within the DESCRIBED SITE where the samplings were obtained;
- E. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts;
- F. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these

interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

INTERROGATORY NO. 7:

At any time during or after the time designated in the notice, was bulk sampling conducted at any of the DESCRIBED SITES in which you had an ownership or possessory interest? If so:

- A. Describe why the sampling was conducted;
- B. Describe the results thereof;
- C. Set forth the dates on which such samplings were performed;
- D. Describe the location or locations within the DESCRIBED SITE where the samplings were obtained;
- E. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.
- F. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

INTERROGATORY NO. 8 (Premises and Contractor Defendants Only):

For each instance that work was performed by contractors or subcontractors at any of the DESCRIBED SITES involving the installation, the disturbing, handling or removal of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS, state what measures, if any, were taken by YOU or YOUR employees to provide a safe working environment as regards asbestos exposure in the AREAS where the PLAINTIFF worked at the designated times.

- A. IDENTIFY the person(s) presently most knowledgeable about the information sought in this interrogatory or its subparts.

B. Either attach all DOCUMENTS, or discs containing such data, evidencing the information sought in this interrogatory and its subparts to your answer to these interrogatories, or describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for production of documents.

INTERROGATORY NO. 9:

IDENTIFY each person who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

INTERROGATORY NO. 10:

If any person YOU have identified in YOUR answers to these interrogatories has had his or her deposition taken, IDENTIFY the deposition by the name of the deponent, the date the deposition was taken, the caption and number of the action in which it was taken, the court which had jurisdiction over the action in which it was taken (including state and county), and either the name and address of the court reporting agency which took the deposition or the name and address of deponent's counsel of record.