Manville Internal Correspondence

To
Nancy Stead

Date
April 10, 1985

From
Erika Powers

Copies
File/Chrono

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

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

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

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

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

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

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

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	Production Box
Thermosbestos	AS-74

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

Metal-on	AS-73

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

Thermo-12	CIC-70

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

Thermo-12 and Metal-on	CIC-71

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

Thermo-12 and Metal-on	CIC-74

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

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1/9/84

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

REQUESTOR	CARTON NO.	FILE DESCRIPTION	NUMBER OF PAGES
RAS	AS-77	Sealing Cmpounds	5
RAS	AS-77	Silicia	6.
RAS	AS-77	Sales Brochure	26
RAS	AS-77	Home Insul	18
RAS	AS-77	Supervex.	13
RAS	AS-77	Supervex M.	9
RAS	AS-77	Supervex.	44
RAS	AS-77	Supervex SC	3
~~RAS~~	~~AS-77~~	~~Supervex~~	~~8~~
RAS	AS-77	Thermolv	26
RAS	AS-77	product info	10
RAS	[redacted]	Thermobestos	150
RAS	[redacted]	Thermobestos Extended Legs	8
RAS	[redacted]	Thermobestos	27
			345
		TOC	

345

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GOVERNMENT
PRODUCTION LOG

(1)

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

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

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[redacted] OVERNMENT
PRODUCTION LOG

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

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

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

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

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

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
JAB	7/3/84

TIME (BOX)

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

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GOVERNMENT
PRODUCTION LOG

(2)

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

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

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7-9-84 Jan. IRA 1/16/84

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

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

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OVERNMENT
PRODUCTION LOG

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

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

GOVERNMENT
PRODUCTION-LOG

(1)

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

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

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GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
C1C67	IRA	O'Neill	1:24	2:21
C1C72	"	Papazian	1:34	1:56
C1C57	"	Vider	1:34	2:16
C1C58	"	"	1:38	2:20
C1C55	"	Moulis	1:52	2:20
C1C51	"	Papazian	1:56	2:21
C1C61	"	Vider	2:21	2:31
C1C60	"	Moulis	2:21	4:55
C1C70	"	O'Neill	2:22	2:56
C1C73	"	Papazian	2:22	2:36
C1C74	"	Holloway	2:26	4:55
C1C62	"	Vider	2:36	2:45
C1C71	"	Papazian	2:36	2:45
C1C63	"	Vider	2:45	2:51
C1C78	"	Papazian	2:46	4:47
C1C64	"	Vider	2:51	3:45
C1C77	"	O'Neill	3:32	4:35
C1C65	"	Vider	3:45	4:00
C1C66	"	"	4:00	4:10
C1C67	"	"	4:10	4:35
C1C68	"	"	4:35	4:36
C1C69	"	"	4:36	4:55
	Total 49			

GOVERNMENT PRODUCTION LOG

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

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

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

GOVERNMENT PRODUCTION
MICROFILMING REQUEST

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

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

TIME (BOX)

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	OUT	IN
C1C67	IRA	O'Neill	1:24	2:21
C1C72	"	Papazian	1:34	1:56
C1C57	"	Vider	1:34	2:16
C1C58	"	"	1:38	2:20
C1C55	"	Moulis	1:52	2:20
C1C51	"	Papazian	1:56	2:21
C1C61	"	Vider	2:21	2:31
C1C60	"	Moulis	2:21	4:55
C1C70	"	O'Neill	2:22	2:56
C1C73	"	Papazian	2:22	2:36
C1C74	"	Holloway	2:26	4:55
C1C62	"	Vider	2:36	2:45
C1C71	"	Papazian	2:36	2:45
C1C63	"	Vider	2:45	2:51
C1C78	"	Papazian	2:46	4:47
C1C64	"	Vider	2:51	3:45
C1C77	"	O'Neill	3:32	4:35
C1C65	"	Vider	3:45	4:00
C1C66	"	"	4:00	4:10
C1C67	"	"	4:10	4:35
C1C68	"	"	4:35	4:36
C1C69	"	"	4:36	4:55
	Total 44			

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
[illegible]	7-6-82

TIME (BOX)

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

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
GCM	7-5-84

CONTAINER NUMBER	ORGANIZATION	NAME (PLEASE PRINT)	TIME (BOX) OUT	TIME (BOX) IN
C1C67	IRA	O'Neill	1:24	2:21
C1C72	"	Papazian	1:34	1:56
C1C57	"	Vider	1:34	2:16
C1C58	"	"	1:38	2:20
C1C55	"	Moulis	1:52	2:20
C1C51	"	Papazian	1:56	2:21
C1C61	"	Vider	2:21	2:31
C1C60	"	Moulis	2:21	4:55
C1C70	"	O'Neill	2:22	2:56
C1C73	"	Papazian	2:22	2:36
C1C74	"	[illegible]	[illegible]	4:55
C1C62	"	Vider	2:36	2:45
C1C71	"	Papazian	2:36	2:45
C1C63	"	Vider	2:45	2:51
C1C78	"	Papazian	2:46	4:47
C1C64	"	Vider	2:51	3:45
C1C77	"	O'Neill	3:32	4:35
C1C65	"	Vider	3:45	4:00
C1C76	"	"	4:00	4:10
C1C67	"	"	4:10	4:35
C1C68	"	"	4:35	4:36
C1C69	"	"	4:36	4:55
	Total 44			

GOVERNMENT
PRODUCTION LOG

INITIALS	DATE
[illegible]	7-6-82

TIME (BOX)

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

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GOVERNMENT
PRODUCTION LOG

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

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

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RFA

183. J-M objects to Request for Admission No. 183 on the grounds that it is ~~vague and ambiguous, overly broad~~ overly broad in that no time period is specified and vague and ambiguous, especially in its use of the terms "use" and "promote". Without waiving said objections, J-M responds as follows: J-M used its own literature and sales of 85% Magnesia pipe and block insulation. and "promotional literature."

184. J-M objects to Request for Admission No. 184 on the grounds that it is overly broad in that no time period is specified, and vague and ambiguous, especially in its use of the terms "used" and "promotional literature." Without waiving said objections, J-M responds as follows: ~~J-M used its own literature to and sales of 85% Magnesia pipe and block insulation.~~ Admitted.

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

relevant to this lawsuit.

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

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