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April 30, 1985

RECEIVED
APR 30 1985
LEGAL DEPARTMENT

Barbara Diemer
Manville Corporation
P.O. Box 5723
Denver, Colorado 80217

Re: United States of America - Request for Admission

Dear Barbara:

Pursuant to your letter of April 12, 1985, we have taken an opportunity to review our notes and transcripts which we have received concerning depositions taken in the government litigation in order to assist you in responding to Request for Admission. Based upon our review, we would recommend the following responses:

Request 135: Object as overly broad and nonspecific, especially with reference to the term "use" and to the term "promote."

Request 136: Admit.

Request 137: Admit.

Request 138: Object as overly broad and nonspecific. The term "representatives" is vague and ambiguous.

Request 139: Admit.

Request 140: Unknown (however likely).

Request 141: Unknown.

Request 142: Unknown.

Request 143: Unknown.

Request 144: Unknown.

Request 145: Unknown.

Request 146: Unknown.

Request 147: Unknown.

Request 148: Unknown.

We are sorry that we have been unable to provide information on all of the matters which you directed our attention to, however we have not been involved in the depositions of Western McArthur/Western Asbestos employees or in depositions of Thorpe Insulation employees. We are enclosing for your review portions of four deposition transcripts which relate to the distribution of Johns-Manville sales literature. We have attempted to identify those particular sections which deal with this subject and have highlighted them in red. If we can be of any further assistance, do not hesitate to call upon us.

Very truly yours,

MONTGOMERY, GREEN & JARVIS

By /s/ H. Keith Jarvis
H. Keith Jarvis

HKJ:vsg
Enclosure

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