

*Hampshire Supplemental Responses to Requests for
Admission Abate # 11/23/93*

REQUEST NO. 77:

In connection with the manufacture of your asbestos-containing products, your own employees would at times perform the following functions with respect to your asbestos-containing products:

- a. mix;
- b. saw;
- c. cut;
- d. trim;
- e. test;
- f. spray or gun;
- g. handle;
- h. sand.

ANSWER TO REQUEST NO. 77:

Denied. See Answer to Request No. 6.

REQUEST NO. 78:

In connection with your own business, you employed individuals who performed duties of:

- a. pipecoverers;
- b. insulators;
- c. pneumatic gun operators;
- d. spray gun operators;
- e. plasterers;
- f. installing asbestos-containing ceiling floor tiles;
- g. installing asbestos-containing drywall/wallboard;
- h. brake and/or clutch mechanics;
- i. vehicle assembly workers or maintenance men;
- j. steamfitters;
- k. pipefitters;
- l. joiners;
- m. shipfitters;
- n. electricians;
- o. latherers;
- p. sheet metal workers;
- q. bricklayers;
- r. millwrights;
- s. welders;
- t. burners;
- u. ironworkers;
- v. laborers;
- w. carpenters;
- x. painters;
- y. boilermakers;
- z. plumbers;

LAW OFFICES
THOMAS & LIBOWITZ, P.A.
PROFESSIONAL ASSOCIATION
FIFTH FLOOR
10 N. CHARLES STREET
BALTIMORE, MARYLAND
21201-4305



*Hampshire Supplemental Responses to Requests for
Admissions Abate II 11/23/93*

- aa. roofers;
- bb. operating engineers;
- cc. automobile and/or truck mechanics.

ANSWER TO REQUEST NO. 78:

Admitted as to d, e, f, g, o, v, w, x, and aa. Otherwise denied.

REQUEST NO. 79:

At no time did you advise persons who used, handled or were exposed to your asbestos-containing products that:

(a) you had concluded that respirators in use were inadequate to assure prevention of illnesses and diseases arising out of exposure to asbestos dust, and

(b) you had knowledge that respirators procured for use by your employees exposed to asbestos were not capable of filtering asbestos fibers smaller than 3.5 microns in diameter.

ANSWER TO REQUEST NO. 79:

Denied. See Answer to Request No. 33.

REQUEST NO. 80:

You first installed vacuum and/or exhaust systems on equipment used in fabricating, processing, cutting, mixing or handling asbestos and/or asbestos-containing products at your manufacturing facilities in the following time period:

- | | |
|-----------------|---------------|
| a. before 1930; | b. 1930; |
| c. 1930-1939; | d. 1940-1949; |
| e. 1950-1959; | f. 1960-1964; |
| g. 1965-1969; | h. 1970-1975; |
| i. 1976-1979; | j. 1980-1985; |
| k. 1986-1990; | l. 1991-1993. |

ANSWER TO REQUEST NO. 80:

Denied. Not applicable. Hampshire is not a manufacturer.

REQUEST NO. 81:

You first required your employees to have regular chest x-rays in the following time period:

LAW OFFICES
THOMAS & LIBOWITZ, P.A.
PROFESSIONAL ASSOCIATION
FIFTH FLOOR
30 N. CHARLES STREET
BALTIMORE, MARYLAND
21201-4305