

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

does not know what type of asbestos was in any asbestos-containing materials it may have used.

REQUEST NO. 14:

You knew that asbestos-containing products you manufactured, sold, distributed, used and/or installed would:

- (a) Be used to insulate equipment, structures and pipes which generated heat;
- (b) Be used by steel plants;
- (c) Be used by power plants;
- (d) Be used by shipyards;
- (e) Be used by asbestos insulators;
- (f) Be used by pipecovers;
- (g) Be used by bricklayers;
- (h) Be used by pipefitters;
- (i) Be used by laborers;
- (j) Be used in areas where trades other than pipecoverers would be working;
- (k) Be used by Plaintiffs;
- (l) Be used by contractors;
- (m) Be used by sheetmetal workers;
- (n) Be used by automobile and/or truck mechanics;
- (o) Be used by brake and/or clutch mechanics;
- (p) Be used by crane and/or hoist operators;
- (q) Be used by crane and/or hoist maintenance workers; and
- (r) Be used by vehicle assembly workers and/or maintenance workers.

ANSWER TO REQUEST NO. 14:

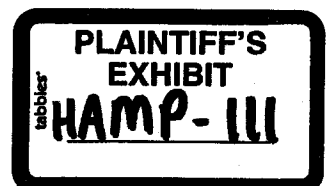
Denied inasmuch as Hampshire was itself an end-user of asbestos-containing materials, and once they were incorporated into the buildings in which Hampshire used them they cannot be said fairly to have been used again.

REQUEST NO. 15:

You knew that in the normal and expected use of your asbestos-containing products that those products would be:

- (a) Handled;
- (b) Moved;
- (c) Removed from their container;
- (d) Cut;

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- (e) Trimmed;
- (f) Sawed;
- (g) Mixed;
- (h) Installed;
- (i) Gunned or sprayed;
- (j) Removed;
- (k) Ripped or torn;
- (l) Ripped out;
- (m) Sanded.

ANSWER TO REQUEST NO. 15:

Admitted to the extent that Hampshire knew that in the course of its use of asbestos-containing material as a subcontractor working pursuant to contracts, specifications, and instructions of building owners, architects, and general contractors, it would handle, move, remove from their containers, cut, trim, saw, mix, spray, or sand, such materials, but see Answer to Request No. 1.

REQUEST NO. 16:

The asbestos-containing products which you manufactured, sold, distributed, used and/or installed gave off or created asbestos-containing dust when:

- (a) Handled;
- (b) Moved;
- (c) Removed from their container;
- (d) Cut;
- (e) Trimmed;
- (f) Sawed;
- (g) Mixed;
- (h) Installed;
- (i) Gunned or sprayed;
- (j) Removed;
- (k) Ripped or torn;
- (l) Ripped out;
- (m) Sanded.

ANSWER TO REQUEST NO. 16:

Denied, except that Hampshire admits that certain of the asbestos-containing materials it used gave off or created asbestos-containing dust when subjected to the aforesaid procedures.