

IN THE COURT OF COMMON PLEAS
FOR PHILADELPHIA COUNTY

IN RE: ASBESTOS LITIGATION : OCTOBER TERM, 1986
IN PHILADELPHIA COURT OF : NO. 8610-0001
COMMON PLEAS :

PLAINTIFFS' GENERAL MASTER LONG-FORM COMPLAINT

Pursuant to an Order dated July 30, 1986, by the Honorable Edward J. Blake and the Honorable Richard B. Klein, the undersigned attorneys for plaintiffs in asbestos actions bring this Master General Long-Form Complaint against the following defendants:

A. C. & S., INC.
180 W. Church Road
King of Prussia, Pennsylvania 19406

ABEX CORPORATION
c/o Prentice Hall Corporation
System, Inc.
100 Pine Street
Harrisburg, Pennsylvania 17108

AIRCO WELDERS SUPPLY
4501 N. Howard Street
Philadelphia, Pennsylvania 19140

ALLIED CORPORATION
Columbian Road & Park
Morristown, New Jersey 07961

ALLPAX (USA) INC.
Marmeroneck, New York

AMCHEM PRODUCTS, INC.
300 Brookside Avenue
Ambler, Pennsylvania 19002

AMERICAN ENERGY PRODUCTS, INC.
667 Brea Canyon Road
Suite 20-B
Walnut, California 91789

AMERICAN MOTORS SALES CORPORATION
c/o CT Systems
123 South Broad Street
Philadelphia, Pennsylvania 19107

AMERICAN STANDARD
Station Street
Wilmerding, Pennsylvania

AM GENERAL CORPORATION
701 Chippewa Avenue
South Bend, Indiana

AMOS (PTY) LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

ANCHOR PACKING COMPANY, INC.
One Buttonwood Square
2001 Hamilton Street
Philadelphia, Pennsylvania 19130

A.P. GREEN REFRACTORIES COMPANY
Hedley and Delaware Avenue
Philadelphia, Pennsylvania 19137

ARMSTRONG WORLD INDUSTRIES, INC.
Liberty and Charlotte Streets
Lancaster, Pennsylvania 17604

ASBEKA INDUSTRIES OF N.Y., INC.
2324 McDonald Avenue
Brooklyn, New York

ASBESTOS CORPORATION LTD.
1940 Sun Life Building
1155 Metcalf Street
Montreal, Canada H3B2X6

or
Thetford Mines
Quebec, Canada

ASBESTOS INSULATION COMPANY, INC.
a/k/a Deerland Corporation
311 West Marshall Street
Norristown, Pennsylvania 19401
ASBESTOS PRODUCTS MFG. CORPORATION
c/o Herbert L. Levine
3215 Avenue "H"
Brooklyn, New York 11210

ASBESTOSPRAY CORPORATION
c/o Herbert L. Levine
3215 Avenue "H"
Brooklyn, New York 11210

ASHLAND OIL, INC.
Box 391
Ashland, Kentucky 41114

ASSOCIATED INSULATION, INC.
Pennsylvania

ASSOCIATED MINERALS CORPORATION
Iver Lane Cowley, Uxbridge
Middlesex, England

ASTEN-HILL MANUFACTURING COMPANY
Henry and Roberts Avenues
Philadelphia, Pennsylvania

ATLAS TURNER, INC.
5600 Hochelaga Street
Montreal, Quebec, Canada

AUTOMOTIVE PARTS COMPANY
5505 Centre Avenue
Pittsburgh, Pennsylvania

A.W. CHESTERTON, INC.
Massachusetts

BABOCK and WILCOX
1810 Chapel Ave. West
Cherry Hill, New Jersey
or
c/o Charles J. Tague, Jr.
P.O. Box 1310
Bryn Mawr, Pennsylvania 19010
or
1010 Common Street
New Orleans, Louisiana 70106

BABCOCK and WILCOX TUBULAR PRODUCTS
Box 401
Beaver Falls, Pennsylvania 15010

BALTIMORE & OHIO RAILROAD
c/o Rudolph Garcia, Esquire
Centre Square West, 38th Floor
Philadelphia, Pennsylvania 19102

BARKER PIPE FITTINGS CO.
271 Lancaster Pike
Frazer, Pennsylvania 19355

BASIC, INCORPORATED
845 Hama Building
Cleveland, Ohio 44115

BELL ASBESTOS MINES, LTD.
c/o Thetford Mines
P.O. Box 99
Quebec, Canada

BENJAMIN FOSTER
Division of Amchem
25 Brookside Avenue
Ambler, Pennsylvania 19002

BEVCO INDUSTRIES
790 Birney Highway
Aston, Pennsylvania 19014

BIRD, INCORPORATED
Washington Street
East Walpole, Massachusetts 02032

BORG WARNER CORPORATION
615 Griswold
Detroit, Michigan 48226

BRAKE & CLUTCH COMPANY
OF PHILADELPHIA
1610 Fairmount Avenue
Philadelphia, Pennsylvania 19130

BRAND INSULATIONS, INC.
c/o Norman L. Haase
Kelly, Haase & Dunn
344 West Front Street
Media, Pennsylvania 19063

BRINCO MINING LTD.
2000 Guinness Tower
1055 W. Hastings Street
Vancouver, B.C.
Canada V6E 3VE

BRITISH SOUTH AFRICA CO., LTD.
40 Holborn Viaduct
London, England

CAPE ASBESTOS FIBRES, LTD.
114 Park Street
London, W1Y 4AB
England

CAPE ASBESTOS INDUSTRIES, LTD.
114 Park Street
London, England

CAPE ASBESTOS S.A. (PTY) UNITED LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

CAPE BOARD & PANELS
Iver Lane, Uxbridge
UB8, 2IQ, England

CAPE INDUSTRIES, LTD.
114 Park Street
London, W1Y 4AB
England

CAREY-CANADA, INC.
P.O. Box 190
E. Broughton Station
Quebec, Quebec,
Canada GON1HO

CARLISLE CORPORATION
Molded Materials Co.
d/b/a/ Motion Control Industries
P.O. Box P
Gillis Avenue
Ridgeway, Pennsylvania

CE MINERALS, INC.
443 South Gulph Road
King of Prussia, Pennsylvania 19406

CE REFRACTORIES
a Division of Combustion Engineering, Inc.
901 East 8th Avenue
King of Prussia, Pennsylvania
or
900 Long Ridge Road
Stampen, Connecticut 06902

CELOTEX CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109
or
1500 W. Dalemabry Highway
Tampa, Florida 33607

CENTRAL JERSEY INDUSTRIES, INC.
2 Aldwyn Center
Villanova, Pennsylvania 19085

CENTRAL MINING FINANCE, LTD.
40 Holborn Viaduct
London, England

CERTAIN-TEED CORPORATION
Swedesford and Old School Roads
Valley Forge, Pennsylvania 19481

CHARLES F. GUYON
c/o Theodore Levy
900 South 4th Street
Harrison, New Jersey 07029

CHARTER CONSOLIDATED INVESTMENTS, LTD.
40 Holborn Viaduct
London, England

CHARTER CONSOLIDATED P.L.C.
40 Holborn Viaduct
London, England

CHARTER CONSOLIDATED SERVICES, LTD.
40 Holborn Viaduct
London, England

CHICAGO FIRE BRICK CO.
c/o Ralph Schindler
1467 N. Elston Avenue
Chicago, Illinois 60622

CHILDERS PRODUCTS COMPANY, INC.
23350 Merchantville Road
Cleveland, Ohio 44122

CHRYSLER CORPORATION
c/o G. Lee Philp
1200 Lynn Townsend Drive
Highland Park, Michigan 48203

CLARK CONTROLLER COMPANY
CT Company
123 South Broad Street
Philadelphia, Pennsylvania 19107

COLLINS PACKING COMPANY, INC.
5024 Mulberry Street
Philadelphia, Pennsylvania 19124

COLONIAL ELECTRIC SUPPLY
A Pennsylvania Corporation
2901 PSFS Building
Philadelphia, Pennsylvania

COLONIAL RUBBER
Elbo Lane and Texas Avenue
Mount Laurel, New Jersey 08054

COLUMBIA BOILER COMPANY OF POTTSTOWN
Old Reading Pike,
P. O. Box G
Pottstown, Pennsylvania 19464

COMBUSTION ENGINEERING CO., INC.
c/o Weaver, Willman & Arnold
705 McKnight Park Drive
Pittsburgh, Pennsylvania 15237
or
900 Long Ridge Road
Stamford, Connecticut 06902

CONSOLIDATED MINES SELECTION CO., LTD.
40 Holborn Viaduct
London, England

CONSOLIDATED RAIL CORPORATION
Six Penn Center Plaza
Philadelphia, Pennsylvania 19104

COONEY BROTHERS, INC.
S.W. Corner 5th and Dauphin
Philadelphia, Pennsylvania 19133

CRANE PACKING
682 Parkway
Broomall, Pennsylvania

CROWN CORK & SEAL COMPANY, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

C. TENNANT & SONS & CO., OF NEW YORK
Division of Cargil
P. O. Box 9300
Minneapolis, Minnesota 55440

CULP BROTHERS, INC.
R.R.2
Box 369
Perkasie, Pennsylvania 18944

CURTIS INDUSTRIES
Division of Congoleum Corporation
CT Systems
123 South Broad Street
Philadelphia, Pennsylvania

DANA CORPORATION
4500 Dorr Street
P.O. Box 1000
Toledo, Ohio 43697

or
Corporate Trust Inc.
Resident Agent
32 South Street
Baltimore, Maryland 21202

D.A.R. INDUSTRIAL PRODUCTS, INC.
3645 N. Smedley Street
Philadelphia, Pennsylvania 19140

DAVIS BRAKE & EQUIPMENT
CORPORATION
2219 N. Second Street
Philadelphia, Pennsylvania 19133

DECKER ASSOCIATES, INC.
Pennsylvania

DELAWARE INSULATION COMPANY
Fifth Avenue & Coleman Streets
Wilmington, Delaware 19899

DELAWARE VALLEY SAFEGUARD
COMPANY, INCORPORATED
Leiz's Road
R D #1
Leesport, Pennsylvania 19533

DELCO PRODUCTS
P.O. Box 1042
Dayton, Ohio
or
3031 West Grand Blvd.
P.O. Box 33122
Detroit, Michigan

DRAVCO CORPORATION
One Oliver Plaza
Pittsburgh, Pennsylvania 15222

DRESSER INDUSTRIES, INC.
c/o CT Corporation Systems
320 Oliver Building
Pittsburgh, Pennsylvania 15222

DURABLA
27 Industrial Boulevard
Paoli, Pennsylvania 19301

or
5th & Liberty Avenues
Pittsburgh, Pennsylvania

DURAMETALLIC CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

DUROX EQUIPMENT COMPANY
12351 Prospect Road
Cleveland, Ohio 44136

EAGLE-PICHER INDUSTRIES, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

EARL B. BEACH COMPANY
A Pennsylvania Corporation
546 Penn Street
Yeadon, Pennsylvania

EAST PENN REFRACTORIES
P. O. Box 277
Lehigh Street
Reading, Pennsylvania 19603

EATON CORPORATION, formerly known
as Cutler Hammer, Inc.
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

EGNEP (PTY) LTD.
Burlington House
22 Rissik Street
Johannesburg, Tv1
Republic of South Africa

ELBO INDUSTRIAL SUPPLY COMPANY
305 N.6th Street
Philadelphia, Pennsylvania 19106

EMPIRE ACE INSULATION COMPANY
One Cozin Avenue
Brooklyn, New York 11207

EMPIRE INSULATION OF NORTHEAST MISSOURI
c/o Gilbert Coan
Box 215
Lewiston, Missouri 63452

ERIE-LACKAWANNA, INC.
1302 Midland Building
Cleveland, Ohio 44115

F. B. WRIGHT DISTRIBUTION CO.
180 Church Street
King of Prussia, Pennsylvania

FERRO ENGINEERING, a Division of
Oglebay Norton Company
100 West 10th Street
Wilmington, Delaware 19801

FIBREBOARD CORPORATION
22 Battery Street
Suite 404
San Francisco, California 94133

FIRESTONE TIRE & RUBBER CO.
Worldbestos Division
1112 South 25th Street
New Castle, Indiana 47362

FLEXITALLIC GASKET COMPANY
151 Heller Place
Bellmawr, New Jersey 08031

FLINTKOTE CO.
365 W. Passarc Street
Rochelle Park, New Jersey 07662
or
4 Embarcadero Center
San Francisco, California 94111

FORD MOTOR COMPANY
c/o Sidney Kelly
The American Road
Dearborn, Michigan 48121

FOSECO, INCORPORATED
123 South Broad Street
Philadelphia, Pennsylvania 19109

FOSTER WHEELER CORPORATION
668 5th Avenue
New York, New York 10019

GAF CORPORATION
c/o Prentice Hall Corporation Systems
100 Pine Street
Harrisburg, Pennsylvania 17108
or
1361 Alps Road
Wayne, New Jersey 07470

GARFIELD MOLDING COMPANY, INC.
P.O. Box 40
Garfield, New Jersey 17026

GARLOCK, INC.
P.O. Box 8090
Longview, Texas 75601

GENERAL ELECTRIC COMPANY
One River Road
Schnectady, New York

GENERAL MOTORS CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

GENERAL REFACTORIES
225 City Avenue
Bala Cynwyd, Pennsylvania 19004

GENSTAR CORPORATION
Suite 380o0
Four Embarcadero Center
San Francisco, California 96111

GEORGE A. ROWLEY & CO., INC.
a/k/a Peltz Rowley
5700 Tacony Street
Philadelphia, Pennsylvania 19135

GEORGE V. HAMILTON, INC.
326 Linden Street
McKees Rocks, Pennsylvania

GEORGIA-PACIFIC CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

GLOBE REFRACTORIES, INC.
P. O. Box D
Newell, West Virginia 26050

GOULDS PUMPS, INC.
240 Fall Street
Seneca Falls, New York 13148

GREEN TWEED & COMPANY, INC.
Deweiler Road
Kulpsville, Pennsylvania

GRIFFIN WHEEL COMPANY
Division of Amsted
3700 Prudential Plaza
Chicago, Illinois 60601

GRUMMAN OHIO CORPORATION
c/o C.T. Corporation
123 S. Broad Street
Philadelphia, Pennsylvania 19109

GTE SYLVANIA
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

HAJOCA PLUMBING COMPANY
123 South Broad Street
Philadelphia, Pennsylvania 19109

HARNISCHFEGER CORPORATION
CT Systems
123 South Broad St.
Philadelphia, Pennsylvania 19107

H. K. PORTER CO., INC.
Porter Building
601 Grant Street
Pittsburgh, Pennsylvania 15219

HOPEMAN BROTHERS, INC.
435 Essex Avenue
Waynesboro, Virginia 22980

HUXLEY DEVELOPMENT CORP.
805 3rd Avenue, 28th Floor
New York, New York 10022

INDUSTRIAL PRODUCTS COMPANY
21 Cabot Boulevard
Langhorne, Pennsylvania 19047

INDUSTRIAL SALESMAN
S. Clinton & Elmer
Trenton, New Jersey 08611

INSULATION MATERIALS, INC.
400 Penn Centre Boulevard
Suite 204
Pittsburgh, Pennsylvania

INSULATION PRODUCTS CORPORATION
2100 East Ohio Street
Pittsburgh, Pennsylvania

INTERNATIONAL HARVESTER COMPANY
5401 N. Michigan Avenue
Chicago, Illinois 60611

JACQUAYS ASBESTOS COMPANY
c/o Jacquay's Mining Corporation
1219 South 19th Avenue
Phoenix, Arizona 85009

J.H. FRANCE REFRACTORIES CO.
Clarence Road
Snow Shoe, Pennsylvania 16874

JOHN CRANE-HOUDAILLE, INC.
682 Parkway Drive
Broomall, Pennsylvania 19008
or
c/o C. T. Corporation System
123 Broad Street
Philadelphia, Pennsylvania 19109

J. P. STEVENS, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

J. W. ROBERTS, LTD.
20 Saint Mary's Parsonage
Manchester M3 2NL, England

KANE BROTHERS
457 A Street
Sharon, Pennsylvania 16146

KAY WHEEL SALES
1771 Tomlinson Road
Philadelphia, Pennsylvania

KEENE CORPORATION
c/o Prentice Hall Corporations
Systems, Inc.
100 Pine Street
Harrisburg, Pennsylvania 17108

LAC D'AMIANTE DU QUEBEC LTEE.
P.O. Box 608, Black Lake
Quebec, GOW 1A0, Canada

LEAR SIEGLER, INC.
3171 South Bundy Drive
Santa Monica, California 90406

LEHIGH VALLEY RAILROAD COMPANY
415 Brighton Street
Bethlehem, Pennsylvania 19017

LEHIGH VALLEY REFRACTORIES, INC.
Roosevelt and MacArthur Roads
Whitehall, Pennsylvania

LENCO, INC.
319 W. Main Street
Jackson, Missouri 63755

LEONARD J. BUCK, INC.
c/o Francis J. Minchak
P. O. Box 505
2 Shumpike Road
Madison, New Jersey 07940

MACK TRUCKS, INC.
2100 Mack Boulevard
P.O. Box M
Allentown, Pennsylvania 18195

MANUFACTURED RUBBER PRODUCTS COMPANY
4502 N. Howard Street
Philadelphia, Pennsylvania 19140

MAREMONT CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109
or
200 E. Randolph Street
Chicago, Illinois

MCCORD GASKET
191 Labadie Avenue
Wyandotte, Michigan 48192

MELRATH GASKET COMPANY, INC.
wholly-owned subsidiary of
Melrath Gasket Holding Company, Inc.
39th Street and Hunting Park Avenue
Philadelphia, Pennsylvania
a/k/a a TNT LIQUIDATING CO.

MELRATH GASKET HOLDING COMPANY, INC.
30th Street and Hunting Park Avenue
Philadelphia, Pennsylvania
a/k/a a TNT LIQUIDATING CO.

MERIDEN MOLDED PLASTICS, INC.
112 Empire Avenue
Meriden, Connecticut 06450

MOHAWK MANUFACTURING
7354 N. Caldwell
Niles, Illinois

MONSEY PRODUCTS
Cold Stream Road
Kimberton, Pennsylvania

MOTOR SERVICES
573 Fourth Avenue
Brooklyn, New York

NATIONAL GYPSUM COMPANY
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

NATIONAL RAILROAD PASSENGER CORPORATION
1617 J.F.K. Boulevard, Room 710
Philadelphia, Pennsylvania 19104

NATIONAL U.S. BOILER CO., INC.
New Castle, Pennsylvania

NAVISTAR INTERNATIONAL CORPORATION
c/o CT Corporation System
Oliver Building
Mellon Square
Pittsburgh, Pennsylvania 15222

NEW YORKER STEEL BOILER COMPANY, INC.
Bethlehem Pike
Colmar, Pennsylvania 18915

NICOLET, INC.
a Delaware corporation
Maple Street and Wissahickon Avenue
Ambler, Pennsylvania 19002

NIMCO BUS SALES AND BUS PARTS
252 Doremus Avenue
Newark, New Jersey 07105

NORCA CORPORATION
185 Great Neck Road
Great Neck, New York

NORTH AMERICAN ASBESTOS COMPANY
c/o Lord, Bisselle & Block
115 S. LaSalle Street
Chicago, Illinois

NOSROC CORPORATION
1500 Walnut
Philadelphia, Pennsylvania 19102

NUTURN CORPORATION
570 Metroplex Drive
Nashville, Tennessee 37211
or
c/o C.T. Corporation System
530 Gay Street
Knoxville, Tennessee 37902

NYCAL
240 S. Main St.
S. Hackersock, New Jersey 07606

OWENS-CORNING FIBERGLAS CORP.
123 South Broad Street
Philadelphia, Pennsylvania 19109

OWENS-ILLINOIS GLASS CO.
460 N. Gulph Road
King of Prussia, Pennsylvania

OWENS-ILLINOIS, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

PARS MANUFACTURING COMPANY
60 East Penn Street
Norristown, Pennsylvania 19401

PARSON SALES COMPANY, INC.
Pennsylvania

PEERLESS INDUSTRIES, INC.
Spring and Schaeffer Streets
Boyertown, Pennsylvania 19512

PELTZ ROWLEY CHEMICAL COMPANY
5700 Tacony Street
Philadelphia, Pennsylvania

PENN CENTRAL CORPORATION
IVB Building
1700 Market Street
Philadelphia, Pennsylvania 19103

PENNSYLVANIA BRAKE BONDING
9001 Torresdale Avenue
Philadelphia, Pennsylvania 19124

PENN VALVE & FITTING CORPORATION
2440 Maryland Road
Willow Grove, Pennsylvania 19090

PFIZER, INC.
235 East 42nd Street
New York, New York 10017

PITTSBURGH CORNING CORPORATION
1670 Golden Mile Highway
Monroeville, Pennsylvania 15146

PORTER HAYDEN CO.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

PPG INDUSTRIES
One Gateway Center
Pittsburgh, Pennsylvania 15222

QUIGLEY CO., INC.
c/o C.T. Corporation
123 Broad Street
Philadelphia, Pennsylvania
or
c/o C.T. Corporation Systems
277 Park Avenue
New York, New York 10017

QUINT CORPORATION
140 East 16th Street
Erie, Pennsylvania 16512

RAND MINES LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

RAYMARK INDUSTRIES INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

THE READING COMPANY
1 North 12th Street
Philadelphia, Pennsylvania 19107

RICHARD KLINGER COMPANY
2350 Campbell Road
Sidney, Ohio 45365

RILEY STOKER CORPORATION
No. 9 Neponset Street
Worcester, Massachusetts 01606

R-M FRICTION MATERIALS COMPANY
100 Oak View Drive
Trumbull, Connecticut 06611

ROCK BESTOS CO.
400 Penn Centre Boulevard
Suite 204
Pittsburgh, Pennsylvania

ROCKWELL INTERNATIONAL
c/o CT Corporation Systems
Oliver Building
Mellon Square
Pittsburgh, Pennsylvania 15222

ROCK WOOL MFG. CO.
P. O. Box 506
Leeds, Alabama 35094

ROGERS CORPORATION
One Technology Drive
Rogers, Connecticut 06263

ROYAL ELECTRIC SUPPLY COMPANY
3730 Market Street
Philadelphia, Pennsylvania

SAGER CORPORATION, formerly known as
Sager Gloves
An Illinois Corporation
4030 North Nashville Street
Chicago, Illinois 60634

SEPCO CORPORATION
P. O. Box 854
or
Clokan J. Hollan
27611 LaPaza Road
Laguna Niguel, California 92677

SID HARVEY MID ATLANTIC, INC.
King of Prussia, Pennsylvania

SMITH OF PHILADELPHIA
811 E. Cayuga Street
Philadelphia, Pennsylvania 19124

SMS AUTOMOTIVE PRODUCTS
4819 Langdon Street
Philadelphia, Pennsylvania

SOUTHEASTERN PENNSYLVANIA TRANSPORTATION
AUTHORITY
130 S. 9th Street
5th Floor
Philadelphia, Pennsylvania 19107

SOUTHERN TEXTILE CORP.
c/o Porter Building
601 Grant Street
Pittsburgh, Pennsylvania 15219

SPECIAL MATERIALS, INC. - WISCONSIN
C.T. Corporation
222 Washington
Madison, Wisconsin
or
3628 W. Pierce
Milwaukee, Wisconsin 53215

SPRAYON RESEARCH CORPORATION
c/o Richard Kempthorne
1390 South Ocean Blvd.
Pompano Beach, Florida 33062

STRAHMAN VALVES, INC.
Nicolet Avenue
Florham Park, New Jersey

STEARNS DIV. OF F.M.C. CORP.
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

STUDEBAKER-WORTHINGTON, INC.
c/o Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801

THERMAL MATERIALS CORP.
360 Hurst Street
Linden, New Jersey

TNT LIQUIDATING COMPANY
600 First National Bank Bldg.
Erie, Pennsylvania

TRANSCO, INC.
55 East Jackson Boulevard
Chicago, Illinois 60604

TRANSVAAL CONSOLIDATION LAND
& EXPLORATION CO.; LTD.
Johannesberg, South Africa

TURNER ASBESTOS FIBRES, LTD.
c/o Turner & Newall, Ltd.
20 St. Mary's Parsonage
Manchester, M3 2NL, England

TURNER & NEWALL, LTD.
20 Saint Mary's Parsonage
Manchester, England M22-EA

UNION CARBIDE CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

UNIROYAL, INC.
c/o Prentice Hall Corporation
100 Pine Street
Harrisburg, Pennsylvania 17101

UNITED STATES GYPSUM COMPANY
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

UNITED STATES MINERAL PRODUCTS COMPANY
Farnace Street
Stanhope, New Jersey 97874

UNIVERSAL INSULATION COMPANY
c/o Arthur Rank
306 Hialeah Drive
Cherry Hill, New Jersey 08002

U.S. BRAKELINING CORP.
Miami, Florida

VERMONT ASBESTOS GROUP, INC.
Box 54B, R.R. #1
Morrisville, Vermont 05661
or
c/o David Stockpole
P. O. Box 1016
Stowe, Vermont 05672

WAGNER ELECTRIC COMPANY
100 Misty Lane
Parsippany, New Jersey 07054

WARREN BALDERSTON CO.
375 North Will Street
Pittsburgh, Pennsylvania

WEIL McCLAIN CO.
Blaine Street
Michigan City, Illinois 46360

WEINSTEIN SUPPLY COMPANY
Moreland & Davisville Roads
Willow Grove, Pennsylvania 19090

WESTINGHOUSE ELECTRIC CORPORATION
Westinghouse Building
Gateway Center
Pittsburgh, Pennsylvania 15222

WEST PHILADELPHIA ELECTRIC SUPPLY
5828 Market Street
Philadelphia, Pennsylvania

WHEELING BRAKE BLOCK MANUFACTURING COMPANY
Wheeling, West Virginia

W.I.C.K., INC.
Michigan

WILMINGTON SUPPLY OF PENNSYLVANIA
Pennsylvania

W. R. GRACE CO.
Grace Plaza
1114 Avenue of Americas
New York, New York 10036

YORK INDUSTRIES, INC.,
d/b/a York Insulation Company
c/o Gabe Marx
360 Hurst Street
Linden, New Jersey

or

c/o Ronca, McDonald, Judge & Hanley
600 South Livingston Avenue
Livingston, New Jersey 07039

YORK-SHIPLEY INC.
693 North Hills Road
York, Pennsylvania 17402

JURISDICTION AND VENUE

1. (a) Jurisdiction over this action at law is conferred upon this Court pursuant to 42 Pa.C.S. _ 931(a).

(b) With respect to railroad defendants, jurisdiction is also conferred upon this Court by an Act of Congress, known as the Federal Employers' Liability Act, 45 U.S.C. _ 51-60, (referred to herein as "F.E.L.A.").

2. This Court is the proper Court of venue since the cause of action arose in Philadelphia County and/or since all defendants are corporations that regularly conduct business or have conducted business in Philadelphia County, pursuant to 42 Pa.C.S. _ 931(c) and Pa.R.C.P. _ 2179(a)(2) and (3) by the sale or shipment of asbestos in all forms through or in Philadelphia.

3. Pursuant to the Order of This Court, this Complaint is a Master Complaint filed for all plaintiffs represented by any plaintiffs' counsel who has signed agreement to the Master Long Form Complaint and, by operation of such order, all allegations pleaded herein are deemed pleaded in any "Short-Form" Complaint hereafter filed.

DEFENDANTS

4. (a) The defendants are:

(1) Defendant, A.C. & S., Inc., formerly known as Armstrong Contracting & Supply Co., sued in its corporate capacity and as successor by purchase of the Contracting Units of Armstrong Cork Company, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania, and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times

material hereto, Defendant, A.C.&S. Inc., formerly known as, Armstrong Contracting & Supply, Co. and/or its predecessors, including, the Contracting Units of Armstrong Cork Company, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when they were exposed to said asbestos products.)

(2) Defendant, ABEX CORPORATION, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant ABEX CORPORATION is also sued as the successor to American Brake Shoe and American Brake Block. At all times material hereto, Defendant, ABEX CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other asbestos friction and railroad products.

(3) Defendant, AIRCO WELDERS SUPPLY, INC., is the successor corporation of Welders Supply, Inc. It is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business at 4501 N. Howard Street, Philadelphia, Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, AIRCO WELDERS SUPPLY, INC., produced, manufactured, distributed and/or sold, through its predecessor, Welders Supply Inc., either directly or indirectly to the employers of the plaintiffs and/or its predecessors, asbestos products including, but not limited to, asbestos brake shoes, asbestos brake linings and other asbestos friction products.

(4) Defendant, ALLIED CORPORATION, sued in its corporate capacity and as successor in interest to the Bendix Corporation is a corporation organized and existing under the laws of the State of New York, with its principal place of business in New Jersey, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ALLIED CORPORATION and/or its predecessor Bendix Corporation, manufactured, produced and sold, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to the contractors on job

sites on which plaintiffs worked, asbestos products, including, but not limited to asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates, other friction products and asbestos gaskets, packing and sealing devices.

(5) Defendant, ALLPAX (USA) INC., is a Pennsylvania Corporation with a principal place of business in Marmeroneck, NY. Allpax (USA) Inc., is a subsidiary of Allpax Company, Inc. At all times material hereto, defendant, ALLPAX (USA) INC., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(6) Defendant AMCHEM PRODUCTS, INC. is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, AMCHEM PRODUCTS, INC., and/or its predecessors and subsidiaries including Benjamin Foster Co., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked asbestos products, including, but not limited to, Foster Mastic, C. I. Mastic, and other asbestos products.

(7) Defendant, AMERICAN ENERGY PRODUCTS, INC. is a corporation organized and existing under the laws of the State of California, is a citizen and resident of the State of California, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and the State of New Jersey and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, AMERICAN ENERGY PRODUCTS, INC., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products, including, but not limited to SprayDon.

(8) Defendant, AMERICAN MOTORS SALES CORPORATION, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Michigan and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, AMERICAN MOTORS SALES CORPORATION manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(9) Defendant AMERICAN STANDARD INC., is a Delaware Corporation with a principal place of business in New York and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It is the successor in interest to Westinghouse Air Brake Co., which sold asbestos-containing brake shoes.

(10) Defendant, AM GENERAL CORPORATION, is a corporation duly organized and existing under the laws of the State of Indiana with its principal place of business at 701 Chippewa Avenue, South Bend, Indiana, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, AM GENERAL CORPORATION produced, distributed, manufactured, and/or sold asbestos friction products to the employees of the plaintiffs or its predecessors including, but not limited to, brake shoes and brake linings.

(11) Defendant, ANCHOR PACKING COMPANY, INC., is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania, and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ANCHOR PACKING COMPANY, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, mechanical sealing devices, molded rubber products, gaskets and asbestos-containing packings.

(12) Defendant, A.P. GREEN REFRACTORIES COMPANY, is a corporation organized and existing under the laws of the State of Delaware, is qualified to do business in the Commonwealth of Pennsylvania, with a principal place of business at Hedley and Delaware River, Philadelphia, Pennsylvania 19137 which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, A.P. GREEN REFRACTORIES COMPANY, mined, manufactured, produced, and/or sold or distributed asbestos or products containing asbestos, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to the employers of the plaintiffs, and/or to contractors on job sites on which plaintiffs worked, which products were used in the vicinity of the plaintiffs.

(13) Defendant, ARMSTRONG WORLD INDUSTRIES, INC., formerly known as Armstrong Cork Company and/or Armstrong Contracting & Supply Co., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with a principal place of business in Pennsylvania, and is

doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ARMSTRONG WORLD INDUSTRIES, INC., formerly known as Armstrong Cork Company and/or Armstrong Contracting & Supply Co., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, LT Pipecovering, Armaspray and Armaspray 16 insulation, Armaflex adhesive, LT Cork Covering and asbestos gaskets, packing and sealing devices. In addition, Defendant ARMSTRONG WORLD INDUSTRIES, INC., through its subsidiary and/or predecessor corporations, sold, distributed, supplied and/or installed insulation materials and/or contracted to install and maintain insulation materials, either directly or indirectly, in the geographical area in which plaintiffs worked and/or for the employers of the plaintiffs and/or for contractors on job sites on which plaintiffs worked and said insulation materials included, but were not limited to, asbestos products manufactured and produced by the other defendants including, but not limited to, Kaytherm Pipecovering and Block, High-Temperature Pipecovering and Block, Armstrong 85% Magnesia Pipecovering and Block, Bestfelt Pipecovering and Block, Aircell Pipecovering and Block, Kaylo Pipecovering and Block, Armabestos Pipecovering and Block, Oakdale High Pressure Pipecovering and Block, Duplex Pipecovering, Non-sweat Pipecovering, Non-frost Pipecovering, High-Temperature Cement, Armatemp #166 Cement, 85% Magnesia Cement, #152 Asbestos Cement, Amblerex #2 Cement, K.P. Asbestos Floats, "limpet" spray asbestos, and other asbestos products, including, but not limited to, asbestos gaskets, packing and sealing devices.

(14) Defendant, ASBEKA INDUSTRIES OF N.Y., INC., is a corporation organized and existing under the laws of the State of New York, with its principal place of business in New York which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ASBEKA INDUSTRIES OF N.Y., INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(15) Defendant, ASBESTOS CORPORATION OF AMERICA, is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business in New Jersey, and at all times material to this Company, was doing business in the Eastern District of Pennsylvania. At all times material hereto, Defendant ASBESTOS CORPORATION OF AMERICA, has been and/or is now

engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(16) Defendant, ASBESTOS CORPORATION, LTD. is a corporation organized and existing under the laws of Canada, with its principal place of business in Canada which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, ASBESTOS CORPORATION, LTD., during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, milled asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(17) Defendant, ASBESTOS INSULATION COMPANY, INC., a/k/a Deerland Corporation, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ASBESTOS INSULATION COMPANY, INC., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(18) Defendant ASBESTOS PRODUCTS MFG. CORP. is a corporation organized and existing under the laws of the State of New York, is a citizen and resident of the State of New York, and at all times material hereto was doing business in the Commonwealth of Pennsylvania, in the State of New Jersey and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ASBESTOS PRODUCTS MFG. CORP., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products, including, but not limited to Spray Craft.

(19) Defendant, ASBESTOSPRAY CORPORATION is a corporation organized and existing under the laws of the State of New York, is a citizen and resident of the State of New York, and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ASBESTOSPRAY CORPORATION, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products, including, but not limited to Spray Craft.

(20) Defendant, ASHLAND OIL, INC., is a corporation organized and existing under the laws of the state of Kentucky, with its principal place of business in Kentucky, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ASHLAND OIL, INC., and/or its predecessor in interest, F.H. Ross, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing, including, but not limited to packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") including all products manufactured by Johns-Manville Corporation, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked.

(21) Defendant, ASSOCIATED INSULATION, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, ASSOCIATED INSULATION, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(22) Defendant, ASSOCIATED MINERALS CORPORATION is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business in London, England and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It functions as a sales

representative for various corporations in the Cape Industries group. It is also the successor for various corporations in the Cape Industries group that were engaged in the sale and supply of asbestos.

(23) Defendant, ASTEN-HILL MANUFACTURING COMPANY, is a business entity doing business in the Commonwealth of Pennsylvania with its principal place of business at Henry and Roberts Avenues, Philadelphia, Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ASTEN-HILL MANUFACTURING COMPANY, mined, milled, manufactured, produced, processed, supplied, distributed, sold and/or otherwise placed in the stream of commerce, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") to which plaintiff was continuously exposed in the course of his employment for this defendant.

(24) Defendant ATLAS TURNER, INC. is a corporation organized and existing under the laws of the Dominion of Canada, is a citizen and resident of the Dominion of Canada, has its principal place of business in the Province of Quebec, and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, defendant, ATLAS ASBESTOS CO. mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products including, but not limited to, Limpet, acoustical spray, fireproofing spray and other asbestos spray products.

(25) Defendant, AUTOMOTIVE PARTS CO., is a corporation organized and existing under the laws of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, AUTOMOTIVE PARTS CO., mined, manufactured, produced, sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to industrial brake blocks, wire backed industrial brake blocks, and brake linings of various sizes including but not limited to Wagner Brake Linings.

(26) Defendant, A.W. CHESTERTON, INC., is a Massachusetts Corporation with a principal place of business in Massachusetts. At all times material hereto, defendant, A.W. CHESTERTON, INC., mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(27) Defendant BABCOCK and WILCOX is a corporation organized and existing under the laws of a state other than New Jersey or Pennsylvania, has its principal place of business in the State of Louisiana and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, defendant, BABOCK and WILCOX mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbesto products including, but not limited to, asbestos insulated boilers, asbestos block and asbestos cement.

(28) Defendant BABCOCK and WILCOX TUBULAR PRODUCTS is a Pennsylvania corporation with its principal place of business in Pennsylvania. At all times material hereto, Defendant, BABCOCK and WILCOX TUBULAR PRODUCTS, manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiffs, and/or to sub-contractors on their job site, asbestos products and materials to which plaintiffs were exposed. Babcock and Wilcox sold asbestos-containing products, including cements, insulation products and boilers and burners containing asbestos.

(29) Defendant, BALTIMORE & OHIO RAILROAD, is a corporation organized and existing under the laws of the State of Maryland, and was incorporated on February 27, 1826, and is a citizen of the State of Maryland, doing business in the Commonwealth of Pennsylvania, with a registered address for service of process c/o Rudolph Garcia, Esquire, Centre Square West, 38th Floor, Philadelphia, Pennsylvania 19102. BALTIMORE & OHIO RAILROAD operated a railroad which employed certain plaintiffs.

(30) Defendant, BARKER PIPE FITTINGS, CO., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business at 271 Lancaster Pike, Frazer, Pennsylvania 19355. At all times material hereto, defendant, BARKER PIPE FITTINGS, CO., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(31) Defendant, BASIC INCORPORATED, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Connecticut, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, BASIC INCORPORATED, manufactured, distributed and/or supplied asbestos products, including, but not limited to Kilnoise, either directly or indirectly, in the geographical area in which plaintiffs work and/or to the employers of the plaintiffs and/or to

contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(32) Defendant, BELL ASBESTOS MINES, LTD., is a corporation organized and existing under the laws of Canada, with its principal place of business in Canada, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, BELL ASBESTOS MINES, LTD., during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, milled asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(33) Defendant, BENJAMIN FOSTER, Division of Amchem is a corporation organized and existing under the laws of the State of Delaware, is citizen and resident of the State of Delaware, has its principle place of business in the Commonwealth of Pennsylvania, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, BENJAMIN FOSTER, Division of Amchem, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products including, but not limited to fibrous adhesive tape and mastic.

(34) Defendant, BEVCO INDUSTRIES, is a corporation duly authorized to do business within the Commonwealth of Pennsylvania and Federal Eastern District of Pennsylvania, and is domiciled in Commonwealth of Pennsylvania. In 1981, BEVCO INDUSTRIES acquired the business and product lines property of Kay Asbestos, which then dissolved. Kay Asbestos was a distributor of asbestos products and sold such asbestos products to the places of employment relevant to this action. BEVCO INDUSTRIES itself was a distributor of asbestos products including gasket and packing materials. BEVCO is, therefore, liable to plaintiffs for injuries resulting from the sale of and inhalation of dust emitted by asbestos products of BEVCO or Kay Asbestos.

(35) Defendant, BIRD, INCORPORATED, Formerly known as Bird & Son, Inc., is a corporation organized and existing under the laws of the State of Massachusetts, with its principal place of business in Massachusetts, which is doing business in the Commonwealth of Pennsylvania and in the

Federal Eastern District of Pennsylvania. At all times material hereto, BIRD, INCORPORATED manufactured, distributed and/or supplied asbestos roofing and siding products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(36) Defendant, BORG WARNER CORPORATION, is a corporation duly organized and existing under the laws of the State of Michigan with a principal place of business at 615 Griswold, Detroit, Michigan. At all times material hereto, defendant, BORG WARNER CORPORATION, manufactured, produced and/or sold asbestos products, either directly or indirectly to the employers of plaintiffs and/or its predecessors, asbestos products including, but not limited to, asbestos brake shoes, asbestos brake linings and other asbestos friction products.

(37) Defendant, BRAKE & CLUTCH COMPANY OF PHILADELPHIA, INC., is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business at 1610 Fairmont Avenue, Philadelphia, Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, BRAKE & CLUTCH COMPANY OF PHILADELPHIA, INC., manufactured, distributed, produced and/or sold asbestos friction products, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to the employers of the plaintiffs, including, but not limited to, brake shoes, brake linings and Worldbestos Transit Mix and other asbestos friction products.

(38) Defendant, BRAND INSULATIONS, INC., sued in its corporate capacity and as successor by purchase of certain assets of Philip Carey Manufacturing Company, is a corporation organized and existing under the laws of the State of Illinois, with its principal place of business in Illinois and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, BRAND INSULATIONS, INC., and/or its predecessors, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, including, but not limited to, as sole distributor of Philip Carey Manufacturing Company products in one of the geographical areas in which plaintiffs worked, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when they were exposed to said asbestos products.

(39) Defendant, BRINCO MINING LTD., is a corporation organized and existing under the laws of Canada, with its principal place of business in Canada which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania, and is successor by amalgamation to Cassiar Resources Ltd., formerly known as Cassiar Asbestos Corp., Ltd. Defendant, BRINCO MINING LTD., during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, milled asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(40) Defendant, BRITISH SOUTH AFRICA CO., LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey, has its principal place of business in London, England and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It is a wholly-owned subsidiary of defendant Charter Consolidated, Ltd., participating in the control of various corporate members of the Cape Industries Group and is therefore the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp. and Associated Minerals Corp. and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(41) Defendant, CAPE ASBESTOS FIBERS, LTD., is a corporation organized and existing under the laws of South Africa with its principal place of business in South Africa which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CAPE ASBESTOS FIBERS, LTD., has been or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing asbestos, processed asbestos, material containing asbestos, including but not limited to, products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs. This defendant is

also sued as both predecessor and successor in interest to North American Asbestos Company.

(42) Defendant, CAPE ASBESTOS INDUSTRIES, LTD. (formerly the Cape Asbestos Co., Ltd.) is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey, has its principal place of business in London, England and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CAPE ASBESTOS INDUSTRIES, LTD., has been or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing asbestos, processed asbestos, material containing asbestos, including but not limited to, products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs. This defendant is also sued as both predecessor and successor in interest to North American Asbestos Company.

(43) Defendant, CAPE ASBESTOS S.A. (PTY) UNITED, LTD., sued in its corporate capacity and/or as parent and/or as an affiliated company and/or as successor to asbestos mining, milling, producing and distributing companies, including but not limited to, Cape Blue Mines (PTY), Ltd., and/or Egnep, Ltd., is a corporation organized and existing under the laws of South Africa with its principal place of business in South Africa which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CAPE ASBESTOS S.A. (PTY) UNITED, LTD., has been or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing asbestos, processed asbestos, material containing asbestos, including but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs. This defendant is also sued as both predecessor and successor in interest to North American Asbestos Company.

(44) Defendant, CAPE BOARD & PANELS, LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business at Uxbridge, England and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It is a member of the Cape

Industries group that manufactures and sells asbestos-containing products. It is doing business in the United States at this time through its agent W.B. Arnold Co., Inc.

(45) Defendant, CAPE INDUSTRIES, LTD., sued in its corporate capacity and as parent, owner and/or successor to other asbestos mining companies, including, but not limited to, Amosa (PTY), Ltd., is a corporation organized and existing under the laws of the United Kingdom with its principal place of business in the United Kingdom which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CAPE INDUSTRIES, LTD., has been or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing asbestos, processed asbestos, material containing asbestos, including but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs. This defendant is also sued as both predecessor and successor in interest to North American Asbestos Company.

(46) Defendant, CAREY-CANADA, INC., formerly known as Carey-Canadian Mines, Ltd., is a corporation organized and existing under the laws of Canada, with its principal place of business in Canada which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, CAREY-CANADA, INC., during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged, directly or or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, milled asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(47) Defendant, CARLISLE CORPORATION, is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business in Ridgeway, Pennsylvania, with a post office number P.O. Box P, Gillis Avenue, Ridgeway, Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, CARLISLE CORPORATION, distributed, produced and/or sold either directly or indirectly to the employers of the plaintiffs or their predecessors,

asbestos friction products including, but not limited to, asbestos brake shoes, brake assemblies, clutch plates, brake linings, and Transit Mix. In addition, plaintiffs were exposed to asbestos fibers emitted by brake linings, clutch facings and other asbestos friction products used in Grumman or Flexible buses and sold by the defendant. In addition, CARLISLE CORPORATION sold asbestos products in rolls or sheets for use in buses and other vehicles of Septa and its predecessors. CARLISLE CORPORATION sold such asbestos products under the name CARLISLE CORPORATION and also through its unincorporated division, Motion Control Industries. CARLISLE CORPORATION liable for injuries resulting from its torts and those of Motion Control Industries.

(48) Defendant, CE MINERALS, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Eastern District of Pennsylvania. At all times material hereto, Defendant CE MINERALS, INC., formerly known as and/or also known and/or CE Refractories Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to refractories.

(49) Defendant, CE REFRACTORIES (A DIVISION OF COMBUSTION ENGINEERING, INC.), sued in its corporate capacity and as successor to Refractory and Insulation Corp., and M.H. Dettrick Company, is a corporation organized and existing under the laws of the State of Delaware with a registered office situate at 123 South Broad Street, Philadelphia, Pennsylvania 19109 which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, C.E. Refractory, Division of Combustion Engineering, and/or its predecessors, Refractory and Insulation Corp. and/or M.H. Dettrick Company, mined, manufactured, produced, sold, or distributed, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to the employers of the plaintiffs, and/or to the contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, refractory and insulation materials, and boilers.

(50) Defendant CELOTEX CORPORATION is a corporation duly organized and existing under the laws of the State of Delaware and is a citizen of the State of Delaware and has its principal place of business at 1500 N. Dale Mabry Highway, Tampa, Florida. It is successor by virtue of merger with Panacon, Briggs Manufacturing Company, Rapid American, Glen Alden, Philip Carey Corporation, and Philip Carey Manufacturing Company, and Smith and Kanzler and

Philip Carey (New Jersey). At all times material hereto, Defendant Celotex Corporation itself mined, manufactured, produced and sold asbestos products itself to the employers of plaintiffs or sold asbestos products affixed to products sold to the employers of decedent or its predecessor corporations and creatures sold asbestos products to the employers of the plaintiffs, including but not limited to: Hightemp Pipecovering and Block, All Temp Pipecovering and Block, 85% Magnesia Pipecovering and Block, Air Cell Covering, Fibrous Adhesive Bonding, Careytemp Bonding, 7-M-90 Asbestos Shorts, Insulation Cement, Vitracel Cement (Refractory Finishing), LF 20 Asbestos Cement (long fiber), No. 100 Asbestos Cement (hard finish), No. 303 Asbestos Cement, Asbestos Cement, MW-50 Cement, No. 707 Insulating Cement and Thermotex-B Insulating Cement, and asbestos shingles, roofing products and asbestos paper. Furthermore, Philip Carey Corporation acquired Smith & Kanzler Company a wholly-owned subsidiary of Dana Corporation by way of stock purchase in 1969. Prior to Smith & Kanzler Company's acquisition by Philip Carey, it produced, marketed and sold an asbestos product known as "Spray Craft." After the acquisition, Philip Carey continued to produce, market and sell "Spray Craft." Philip Carey Corporation has assumed the assets and liabilities of the Dana Corporation to the extent the Dana Spray Craft product. Philip Carey Corporation has also assumed the assets and liabilities of the Spray Craft product line for its prior owners Smith & Kanzler Corporation and Victor Manufacturing & Gasket Company. It later renamed its now mere creature Smith Kanzler as Philip Carey (New Jersey). Celotex itself, after the acquisition referred to supra, sold the asbestos product lines formerly sold by Smith Kanzler to plaintiffs' employers or is responsible for damages for injuries resulting from exposure to the products of Smith and Kanzler. Celotex Corporation is thus also liable for torts and injuries arising from exposure to Smith and Kanzler asbestos paper, felt, and tape products.

(51) Defendant, CENTRAL JERSEY INDUSTRIES, INC., is a corporation organized and existing under the laws of the State of New Jersey, whose principal place of business and address for process of service is 2 Aldwyn Center, Villanova, Pennsylvania 19085. Central Jersey Industries, Inc., was incorporated on February 26, 1847, as Central Railroad of New Jersey. Central Railroad of New Jersey changed its name on September 7, 1979 to Central Jersey Industries, Inc. CENTRAL JERSEY INDUSTRIES, INC. operated a railroad which employed certain plaintiffs.

(52) Defendant CENTRAL MINING FINANCE, LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business in London, England and at all times material hereto

was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It is a wholly-owned subsidiary of defendant Charter Consolidated, Ltd., and it owns, along with defendant Charter Consolidated Industries, Ltd., the controlling interest in the Cape Industries Group, inter alia, defendant Cape Industries, Ltd. and is therefore the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp. and Associated Minerals Corp. and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(53) Defendant, CERTAIN-TEED CORPORATION, formerly known as Certain-Teed Products Corporation, is a corporation organized and existing under the laws of the State of Maryland with its principal place of business in Maryland and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. CERTAIN-TEED CORPORATION is also sued as successor to and in the capacity of purchaser of assets and liabilities of Keasbey and Mattison's asbestos line, which was absorbed into CERTAIN-TEED CORPORATION's Ambler facility, which manufactures, distributes and supplies, among other things, asbestos products. CERTAIN-TEED CORPORATION is also sued by virtue of its acquisition of Brand Insulations, Inc., during Certain-Teed's merger with Gustin-Bacon Manufacturing Company in 1966; prior to transfer of stock of Brand Insulations into a joint venture known as Certain-Teed Saint Gobain Insulation Corporation in 1967. At all times material hereto Brand Insulations, Inc. was a seller, distributor and/or supplier of asbestos products, as described supra. At all times material hereto, Defendant, CERTAIN-TEED CORPORATION, its predecessors and companies acquired by it, manufactured, produced, distributed and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos cement pipe, asbestos products used in insulation, and other products it manufactured, produced, distributed and/or supplied; and, at certain times relevant hereto, products, previously manufactured by Brand Insulations, Inc. and Keasbey and Mattison.

(54) Defendant, CHARLES F. GUYON is a corporation organized and existing under the laws of a state other than the State of New Jersey, is a citizen and resident of a state other than the State of New Jersey, has its principle place of business in a state other than the State of New Jersey, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal

Eastern District of Pennsylvania. At all times material hereto, defendant, CHARLES F. GUYON mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(55) Defendants, CHARTER CONSOLIDATED P.L.C., sued in its corporate capacities and as successors-in-interest to Cape Industries, Ltd., is a corporation organized and existing under the laws of Great Britain, with its principal places of business located at #40 Holborn Viaduct, London, England, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times relevant hereto CHARTER CONSOLIDATED P.L.C. was the alter ego, parent company, and sole stockholder, and in full control of Cape Industries, Ltd., Amosa (PTY) Ltd., Cape Asbestos South Africa (PTY) United, Cape Blue Mines (PTY) Ltd., Egnep (PTY) Ltd., and other companies, which companies mined, manufactured, processed, imported, converted, compounded, sold, supplied, or delivered substantial amounts of asbestos and asbestos related materials for use, processing, or manufacturing in the Commonwealth of Pennsylvania. At all times material hereto, defendant directly and indirectly caused shipments of raw amosite fiber to be delivered to plaintiffs' worksites. In or around 1967, defendant assumed effective control of and operated an entity known as Cape Industries, which previously acted as a broker for the sale of asbestos fiber in the United States to, inter alia, worksites at which the plaintiffs were exposed. At all times material hereto, North American Asbestos Company was a corporation organized and existing under the laws of the State of Illinois, which acted as an agent and totally controlled division of Cape Industries for the purpose of causing raw amosite asbestos fibers to be shipped into the Commonwealth of Pennsylvania at worksites where plaintiffs were exposed. Raw amosite fiber was shipped through the city of Philadelphia by Cape Industries, said asbestos fibers being consigned to North American Asbestos Company for shipment to the worksites where plaintiffs were exposed. In or around 1978, North American Asbestos Company was dissolved by Cape Industries, at the direction of defendants and, accordingly, they cannot be sued. The dissolution was accomplished for the purpose of escaping liability for the injuries suffered by persons, such as plaintiffs, who were directly or indirectly exposed to raw amosite fiber. Cape Industries, although it can be subjected to the jurisdiction of this Court, by long arm service, has refused to appear in the United States for several years. In fact, Cape Industries has been personally served with process in other asbestos litigation, and has yet to acknowledge the jurisdiction of this Court.

(56) Defendant CHARTER CONSOLIDATED INVESTMENTS, LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New

Jersey or the Commonwealth of Pennsylvania, has its principal place of business in London, England, and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. It is a wholly-owned subsidiary of defendant Charter Consolidated, Ltd., and it owns or owned, along with defendant Central Mining Finance, Ltd., a controlling interest in the Cape Industries Group, inter alia, defendant Cape Industries, Ltd. Defendant Charter Consolidated Investments, Ltd. is the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp. and Associated Minerals Corp. and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(57) Defendant CHARTER CONSOLIDATED SERVICES, LTD. is a foreign corporation organized and existing under the laws of jurisdiction other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business in London, England, and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. It is a wholly-owned subsidiary of defendant Charter Consolidated, Ltd., and is therefore the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp. and Associated Minerals Corp. and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(58) Defendant, CHICAGO FIRE BRICK CO., is a corporation organized and existing under the laws of the State of Illinois, with its principal place of business in the Illinois, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, CHICAGO FIRE BRICK CO., manufactured, distributed and/or supplied asbestos products including but not limited to asbestos fiber, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(59) Defendant, CHILDERS PRODUCTS COMPANY, INC., is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in the State of Ohio, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, CHILDERS

PRODUCTS COMPANY, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(60) Defendant, CHRYSLER CORPORATION, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Michigan which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CHRYSLER CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to asbestos brakes, brake lining, brake blocks, brake discs and pads, clutch plates and other friction products.

(61) Defendant, CLARK CONTROLLER COMPANY is a corporation organized and existing under the laws of the State of Ohio, is a citizen and resident of the State of Ohio, has its principal place of business in the State of Ohio and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, CLARK CONTROLLER COMPANY, manufactured, produced, sold and/or supplied, either directly or indirectly or through its predecessors, to the employer of the plaintiffs, brake assemblies.

(62) Defendant, COLLINS PACKING COMPANY, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, COLLINS PACKING COMPANY, INC., manufactured, produced and sold either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products including, but not limited to, mechanical seals and sealing devices, packing and gaskets.

(63) Defendant, COLONIAL ELECTRIC SUPPLY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, COLONIAL ELECTRIC

SUPPLY, manufactured, produced, sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to insulation block diatomaceous silicia, brake linings including but not limited to those manufactured by Cutler Hammer, and industrial brake blocks including but not limited to those manufactured by Clark Control.

(64) Defendant, COLONIAL RUBBER, is a corporation duly organized and existing under the laws of the State of New Jersey with its principal place of business at Elbo Lane and Texas Avenue, Mount Laurel, New Jersey. At all times material hereto, defendant, COLONIAL RUBBER, manufactured, produced, distributed and/or sold asbestos products either directly or indirectly to the employers of the plaintiffs or their predecessors, including, but not limited to asbestos paper and Thermoid matting.

(65) Defendant, COLUMBIA BOILER COMPANY OF POTTSTOWN, sued in its corporate capacity and as a successor by merger to Columbia Boiler Company, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal District of Pennsylvania. At all times material hereto, Defendant, COLUMBIA BOILER COMPANY OF POTTSTOWN and/or Columbia Boiler Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(66) Defendant, COMBUSTION ENGINEERING, INC., sued in its corporate capacity and as successor in interest to and purchaser of Refractory and Insulation Company is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Connecticut which is doing business in the Commonwealth of Pennsylvania and in the Eastern District of Pennsylvania. At all times material hereto, Defendant COMBUSTION ENGINEERING, INC., and/or its predecessors, including Refractory and Insulation Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, and products incorporating asbestos components including but not limited to refractories and boilers.

(67) Defendant, CONSOLIDATED MINES SELECTION CO., LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey, has its principal place of business in London,

England and at all times material hereto was doing business in the State of New Jersey. It is a wholly-owned subsidiary of defendant Charter Consolidated, Ltd., participating in the control of various corporate members of the Cape Industries Group and is therefore the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp. and Associated Minerals Corp. and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(68) Defendant, CONSOLIDATED RAIL CORPORATION is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, whose principal place of business and address for service of process is Six Penn Center Plaza, Philadelphia, Pennsylvania 19104. Consolidated Rail Corporation is and has been since April 1, 1976 a common carrier by rail and is liable to the plaintiffs as their employer since that date under the Federal Employer's Liability Act and/or as a result of the obligation placed upon it by the Northeast Rail Reorganization Act as amended and/or as the purchaser of and successor to Penn Central Transportation Company, Central Railroad of New Jersey, Reading Company, Lehigh Valley Railroad Company and Erie Lackawanna Railway Company's railroad operations. CONSOLIDATED RAIL CORPORATION operated a railroad which employed certain plaintiffs.

(69) Defendant, COONEY BROTHERS, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business at the S.W. Corner of 5th & Dauphin Street, Philadelphia, PA 19133 which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, COONEY BROTHERS, INC., manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to plumbing supplies and materials that contained asbestos to which plaintiffs were exposed.

(70) Defendant, CRANE PACKING, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, is a citizen of the Commonwealth of Pennsylvania, and has a principal place of business at 682 Parkway, Broomall, Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CRANE PACKING, distributed products containing

asbestos, including, but not limited to, asbestos gaskets and packing manufactured or supplied by some of the defendants named herein, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to the employers of the plaintiffs, and/or to contractors on job sites on which plaintiffs worked, which products were used in the vicinity of the plaintiffs.

(71) Defendant, CROWN CORK & SEAL COMPANY, INC., sued in its corporate capacity and as successor by purchase of certain assets of Mundet Cork Corporation, is a corporation organized and existing under the laws of the State of New York, with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CROWN CORK & SEAL COMPANY, INC., and/or its predecessors, including, Mundet Cork Corporation, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when he was exposed to said asbestos products.

(72) Defendant, C. TENNANT SONS & CO., OF NEW YORK, is a corporation organized and existing under the laws of the State of New York, with its principal place of business in New York, and at all times material to this Complaint, was doing business in the Eastern District of Pennsylvania. At all times material hereto, Defendant, C. TENNANT SONS & CO., OF NEW YORK, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to packaged or bagged asbestos, asbestos products and compounds in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(73) Defendant, CULP BROTHERS, INC., formerly known as Culp Industrial Insulation Company, sued in its corporate capacity and as successor in interest to Culp Industrial Insulation Company, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, CULP BROTHERS, INC., and/or its predecessors, including Culp Industrial Insulation Company, manufactured, produced and sold, either

directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(74) Defendant, CURTIS INDUSTRIES, is a corporation organized and existing under the laws of the State of Delaware, is a citizen and resident of the State of Delaware, has its principal place of business in the State of Ohio and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant CURTIS INDUSTRIES, manufactured, produced, sold and supplied, either directly or indirectly or through its predecessors, to the employer of the plaintiff, asbestos automotive products including, but not limited to brakes, brake linings, clutches, clutch facings, gaskets and other friction materials.

(75) Defendant, DANA CORPORATION, is a corporation duly organized and existing in the Commonwealth of Virginia and is a citizen of the Commonwealth of Virginia with a principal place of business at 4500 Dorr Street, P.O. Box 1000, Toldeo, Ohio. Defendant acquired all of the stock assets and liabilities of Smith and Kanzler employers of the plaintiffs and its predecessors whose stock, assets, before being acquired by DANA. On or about February 18, 1969, Carey (Ohio) acquired the stock, assets and liabilities of S&K from DANA. Upon information and belief, there is an indemnification agreement between Carey (Ohio), now Celotex and DANA, under which DANA retained all liabilities for injuries due to exposure to S&K asbestos products prior to the acquisition by Carey (Ohio). At all times material hereto, Defendant, DANA CORPORATION, and its predecessor corporations, including but not limited to Perfect Circle Corporation, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to Spraycraft Insulation and Tiger Lime and asbestos friction materials.

(76) Defendant, D.A.R. INDUSTRIAL PRODUCTS, INC., formerly known as Delaware Asbestos & Rubber Co., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, and is a citizen of the Commonwealth of Pennsylvania doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, D.A.R. INDUSTRIAL PRODUCTS, INC., and/or its predecessors, including, Delaware Asbestos & Rubber Co., was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the

various other defendants named herein, and including, but not limited to, asbestos gaskets, packing and sealing devices, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when he was exposed to said asbestos products.

(77) Defendant, DAVIS BRAKE & EQUIPMENT CORPORATION, is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania with a principal place of business at 2219 North Second Street, Philadelphia, Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, DAVIS BRAKE & EQUIPMENT CORPORATION, manufactured, produced, distributed and/or sold either directly or indirectly to the employers of the plaintiffs or their predecessors, asbestos friction products including, but not limited to, brake linings, clutch plates, brake shoes, brake blocks and sheets.

(78) Defendant, DECKER ASSOCIATES, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, DECKER ASSOCIATES, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when he was exposed to said asbestos products.

(79) Defendant, DELAWARE INSULATION COMPANY, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Delaware and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, DELAWARE INSULATION COMPANY was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when he was exposed to said asbestos products.

(80) Defendant, DELAWARE VALLEY SAFEGUARD COMPANY, INCORPORATED, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its

principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, DELAWARE VALLEY SAFEGUARD COMPANY, manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiffs, and/or to sub-contractors on their job site asbestos products and materials to which plaintiff was exposed.

(81) Defendant, DELCO PRODUCTS, a Division of General Motors Corporation, is a corporation duly organized and existing under the laws of the State of Ohio with its principal place of business at P.O. Box 1042, Dayton, Ohio.. At all times material hereto, defendant, DELCO PRODUCTS, produced, manufactured, distributed and/or sold to the employers of the plaintiffs or their predecessors, asbestos-containing friction products.

(82) Defendant, DRAVO CORPORATION, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, DRAVO CORPORATION, mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited various sizes of insulation pipe asbestos with 85% Magnesia.

(83) Defendant, DRESSER INDUSTRIES, INC., sued in its corporate capacity and as successor by merger to HARBISONWALKER COMPANY, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Texas which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, DRESSER INDUSTRIES, INC., and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to fireclay and other refractories.

(84) Defendant, DURAMETALLIC CORPORATION, is a corporation organized and existing under the laws of the State of Michigan with its principal place of business in Michigan, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, DURAMETALLIC CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractor on job sites on which plaintiffs

worked, asbestos products, including but not limited to, asbestos yarns, Type A-66-S, foil square rings, Styles 110 and 710, spiral packing, Types 66F, AL and AW, foil packing, Types D-10, D7-10 and B-71, Dura Plastic packing Types 8-7, D-2, 8-77 and D-22, and other asbestos containing packings, rope, braid and sealing products.

(85) Defendant, DURABLA, is a Pennsylvania corporation with its principal place of business at 27 Industrial Boulevard, Paoli, Pennsylvania 19301. At all times material hereto, defendant, DURABLA, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(86) Defendant, DUROX EQUIPMENT COMPANY is a corporation organized and existing under the laws of State of Ohio, with its principal place of business in Cleveland, Ohio at 12351 Prospect Road, Cleveland, Ohio 44136, and is or was doing business with the Commonwealth of Pennsylvania. At all times material hereto, defendant, DUROX EQUIPMENT COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(87) Defendant, EAGLE-PICHER INDUSTRIES, INC., is a corporation organized and existing under the laws of the State of Ohio, with its principal place of business in Ohio and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, EAGLE-PICHER INDUSTRIES, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Epitherm 1200 Pipecovering and Block, Super 66 Insulating Cement, Hylo Cement, Hi-Stick Cement, One-Cote Cement, One-Coat Cement, Insulseal, PV Supertemp, E-P Blankets, E-P Magnesia, 99 Finishing Cement, 106 Finishing Cement, Eagle Dry Cote, Insulstic, 43 Finishing Cement, 85% Magnesia Pipecovering and Block, 33 Insulating Cement, 7M Asbestos Cement, Eagle 20 Cement, Hylo Pipecovering and Block, Swetchek Pipecovering and Block, Stalastic Pipecovering and Block, Vercel Block, Insulastic Pipecovering and Block, and Spraymastic Pipecovering and Block, MW-1, Armatemp No. 10 and Unarco No. 10 Cements and Stamastic and Swetchek covering.

(88) Defendant, EARL B. BEACH CO., is a corporation organized and existing under the laws of the State of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, EARL B. BEACH CO., mined, manufactured, produced, sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to asbestos cloth.

(89) Defendant, EAST PENN REFRACTORIES, is a Pennsylvania corporation with its principal place of business on Lehigh Street, Reading, Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, EAST PENN REFRACTORIES, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(90.) Defendant, EATON CORPORATION, formerly known as Cutler Hammer, Inc., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, EATON CORPORATION, formerly known as Cutler Hammer, mined, manufactured, produced sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to brake linings and clutches.

(91) Defendant, EGNEP (PTY) LTD., is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey, has its principal place of business in Johannesburg, South Africa, and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, defendant EGNEP, (PTY), LTD. was a wholly-owned subsidiary of the Cape Industries group.

(92) Defendant, ELBO INDUSTRIAL SUPPLY COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business at 305 N. 6th Street, Philadelphia, PA 19106 which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times

material hereto, defendant ELBO INDUSTRIAL SUPPLY COMPANY, manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to plumbing supplies and materials that contained asbestos to which plaintiffs were exposed.

(93) Defendant, EMPIRE-ACE INSULATION COMPANY, is a corporation organized and existing under the laws of the State of New York with a principal place of business at One Cozine Avenue, Brooklyn, NJ 11207, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant EMPIRE-ACE INSULATION COMPANY, manufactured, produced and/or sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Air Cell Pipecovering, EM Cell Pipecovering, Air Cell Boards and Blocks, EM Cell Boards and Blocks, Wool Felt Covering, Anti-Sweat Covering, Resisto Climatic Pipecovering, Range Boiler Jackets, Sponge Felt, EM Felt Covering, Magnesia Covering and Blocks, Calcium Silicate Covering and Blocks and Insulating Cements.

(94) Defendant, EMPIRE INSULATION OF NORTHEAST MISSOURI, sued in its corporate capacity and as successor in interest to and purchaser of EMPIRE ASBESTOS COMPANY, is a corporation organized and existing under the laws of the State of Missouri with its principal place of business in the State of Missouri which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant EMPIRE INSULATION OF NORTHEAST MISSOURI and as successor to EMPIRE ASBESTOS COMPANY, mined, manufactured, produced and sold, either directly or indirectly, in the geographic area in which plaintiffs worked and lived asbestos products, including, but not limited to, asbestos cement and other asbestos products.

(95) ERIE-LACKAWANNA, INC., is a corporation organized and existing under the laws of the State of Delaware, on April 14, 1983, said defendant was prior to April 14, 1983, known as the Erie-Lackawanna Railway Company. ERIE-LACKAWANNA, INC. operated a railroad which employed certain plaintiffs.

(96) Defendant, F. B. WRIGHT DISTRIBUTION CO., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania.

At all times material hereto, Defendant, F. B. WRIGHT DISTRIBUTION CO., mined, manufactured, produced sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to asbestos cloth.

(97) Defendant, FERRO ENGINEERING, a Division of Oglebay Norton Company, is a corporation organized and existing under the laws of the State of Ohio and is a citizen and resident of the State of Ohio and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, Defendant, FERRO ENGINEERING, a Division of Oglebay Norton Company, manufactured, produced, mined, distributed and/or sold and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiff and/or to sub-contractors on their job sites, asbestos products and materials to which plaintiffs were exposed.

(98) Defendant, FIBREBOARD CORPORATION, including, but not limited to, the Pabco Industrial Products Division, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in California and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, FIBREBOARD CORPORATION, including, but not limited to, the Pabco Industrial Products Division, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Caltemp Pipecovering and Block, Pabco Magnesia Pipecovering and Block, Prasco Pipecovering and Block, Super Caltemp Pipecovering and Block, Pabco Pipecovering and Block, Precision Molded Pipecovering and Block, F 1 Cement and No. 127 Cement.

(99) Defendant, FIRESTONE TIRE & RUBBER COMPANY, is a corporation organized and existing under the laws of the State of Indiana with its principal place of business in the State of Indiana. At all times material hereto, Defendant, FIRESTONE TIRE & RUBBER COMPANY, including, but not limited to, the Pabco Industrial Products Division, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(100) Defendant, FLEXITALLIC GASKET CORPORATION, is a corporation organized and existing under the laws of the State of Connecticut with its principal place of business in New Jersey which is doing business in the

Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant FLEXITALLIC GASKET CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, asbestos gaskets and packing materials.

(101) Defendant, FLINTKOTE CO., is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Ohio and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, FLINTKOTE CO., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including various building and construction materials and products, including but not limited to, Flintkote Cement, Pipecoating, and Block Paste, tile, asbestos cement pipe, roofing materials, and siding.

(102) Defendant, FORD MOTOR COMPANY, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Michigan which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, FORD MOTOR COMPANY manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(103) Defendant, FOSECO, INC., is a corporation organized and existing under the laws of the state of Delaware with its principal place of business in Ohio, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, FOSECO, INC., at all times material hereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which

plaintiffs worked and/or to employers of plaintiffs and/or to contractors at job sites on which plaintiffs worked.

(104) Defendant, FOSTER WHEELER CORPORATION is a corporation organized and existing under the laws of the State of New York with its principal place of business in New Jersey which is doing business in the Commonwealth of Pennsylvania and in the Eastern District of Pennsylvania. At all times material hereto, Defendant FOSTER WHEELER CORPORATION manufactured, produced and sold asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked.

(105) Defendant, GAF CORPORATION, sued in its corporate capacity and as successor by merger to Ruberoid Co., which was organized and existing under the laws of the State of New Jersey, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in New Jersey and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GAF CORPORATION, and/or its predecessors, including, Ruberoid Co. Mastic Tile, and Eternit, mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, 7M, 115 and 214 Insulation Cements, Calsilite Pipecovering and Block and Hylo Pipecovering and Block, T/NA-100 Insulation Jacketing, Asbestos Paper and Millboard and Calsilite Insulating Cement, and asbestos tile products. GAF is also sued as successor-in-interest and alter ego of Vermont Asbestos Corporation, Vermont Production Co., and The Vermont Asbestos Corporation, all of which mined and sold asbestos fiber.

(106) Defendant, GARFIELD MOLDING COMPANY, INC., is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business in New Jersey which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GARFIELD MOLDING COMPANY, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(107) Defendant, GARLOCK, INC., including, but not limited to, the Precision Seal Division, is a corporation organized and existing under the laws of the State of

Ohio, with its principal place of business in Texas and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GARLOCK INC., including but not limited to, the Precision Seal Division, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos gaskets, packing, and sealing devices.

(108) Defendant, GENERAL ELECTRIC COMPANY ("GE"), is a corporation duly organized and existing under the laws of the State of New York with a principal place of business at One River Road, Schnectady, New York. At all times material hereto, GENERAL ELECTRIC COMPANY, through its distributor, General Electric Supply Company, distributed asbestos products that were used in and around plaintiffs. Certain of the electrical products of GE used in such repair, including wiring and millboard, are asbestos-containing products. As part of the repair and rehabilitation of Septa trolleys, old GE products which contained asbestos and which were decaying, broken, and emitting asbestos dust were removed from trolleys, and new GE asbestos containing asbestos products were installed. In the course of the use, removal, rehabilitation and/or installation of the GE products or activities by employees, asbestos products were cut, sliced and split, causing the emission into the air of asbestos dust and fibers which were inhaled by plaintiffs, all of which was or should have been foreseeable by GE. GE also distributed asbestos activator gaskets to Septa and/or its predecessors and manufactured and/or distributed other asbestos products to Septa and/or its predecessors.

(109) Defendant, GENERAL MOTORS CORPORATION, including, but not limited to, the Delco Products, Delco-Remy and Delco Moraine divisions, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Michigan and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GENERAL MOTORS CORPORATION, including, but not limited to, the Delco Products, Delco-Remy and Delco Moraine divisions, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(110) Defendant, GENERAL REFRACTORIES COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, GENERAL REFRACTORIES COMPANY, or its predecessors and/or alter egos, including East Penn Refractories, mined, manufactured, produced and/or sold or distributed asbestos or products containing asbestos either directly to the employers of the plaintiffs or to contractors on job sites where plaintiffs worked, which products were used in the vicinity of plaintiffs.

(111) Defendant, GENSTAR CORPORATION, sued in its corporate capacity and as successor in interest to the Flintkote Company, is a corporation organized and existing under the laws of the Dominion of Canada, with its principal place of business in California which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GENSTAR CORPORATION and/or its predecessors and divisions, including the Flintkote Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(112) Defendant, GEORGE A. ROWLEY & CO., INC., a/k/a Peltz Rowley, is a Pennsylvania corporation with its principal place of business at 5700 Tacony Street, Philadelphia, Pennsylvania 19135. At all times material hereto, Defendant, GEORGE A. ROWLEY & CO., INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(113) Defendant, GEORGE V. HAMILTON, INC., is a corporation organized and existing under the laws of the State of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GEORGE V. HAMILTON, INC., mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to Insulation Felt 50 Waterproof Asbestos.

(114) Defendant, GEORGIA-PACIFIC CORPORATION, is a corporation organized and existing under the laws of

the State of Georgia, with its principal place of business in Georgia and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GEORGIA-PACIFIC CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, spray asbestos.

(115) Defendant, GLOBE REFRACTORIES, INC., is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in West Virginia which is doing business in the Commonwealth of Pennsylvania and in the Eastern District of Pennsylvania. At all times material hereto, Defendant GLOBE REFRACTORIES, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to refractories.

(116) Defendant, GOULDS PUMPS, INC., is a corporation organized and existing under the laws of the State of New York with its principal place of business in New York which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GOULDS PUMPS, INC., manufactured, produced, and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, pump and stuffing box packing, 1/8" Gland packing, 1/16" gaskets, and other asbestos containing packings, gaskets and sealing devices.

(117) Defendant, GREEN TWEED & COMPANY, INC. is a Pennsylvania Corporation with a principal place of business in North Wales, PA. At all times material hereto, Defendant, GREEN TWEED & COMPANY, INC., manufactured, produced, and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(118) Defendant, GRIFFIN WHEEL COMPANY, is a division of Amstead Industries, and is a corporation organized and existing under the laws of the State of Illinois with its principal place of business in Illinois and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant GRIFFIN WHEEL COMPANY sold

asbestos-containing brake shoes and other asbestos friction materials.

(119) Defendant, GRUMMAN OHIO CORPORATION, formerly known as Grumman Flexible Corporation, is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business in Ohio. At all times material hereto, defendant, GRUMMAN OHIO CORPORATION, or Grumman Flexible Corporation, sold buses to Septa or its predecessors. These buses contained brakes, brake linings, brake shoes and other friction products, each of which contained asbestos to which plaintiffs was exposed. Furthermore, defendant sold asbestos products including, but not limited to, brake linings and brake shoes that contained asbestos to which plaintiffs were exposed.

(120) Defendant, GTE SYLVANIA, is a corporation organized and existing under the laws of the State of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, GTE SYLVANIA, mined, manufactured, produced, sold and supplied, either directly or indirectly through its predecessor corporations, Clark Control and/or A. O. Smith to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to Clark Control brakes, clutches and brake pads.

(121) Defendant, HAJOCA PLUMBING COMPANY, is a corporation organized and existing under the laws of the State of Maine, with a registered business office at 123 S. Broad Street, Philadelphia, PA 19109, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, HAJOCA PLUMBING COMPANY, manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to plumbing supplies and materials that contained asbestos to which plaintiffs was exposed.

(122) Defendant, HARNISCHFEGER CORPORATION, is a corporation organized and existing under the State of Delaware, is a citizen and resident of the State of Delaware, has its principal place of business in the State of Wisconsin, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, HARNISCHFEGER CORPORATION, manufactured, produced, sold and/or supplied, either

directly or indirectly or through its predecessors, to the employer of the plaintiffs, asbestos friction materials, including but not limited to hoist, travel, swing and boom brakes and other friction material.

(123) Defendant, H. K. PORTER CO., INC., sued in its corporate capacity as successor by merger with Thermoid Co., and Tallman-McCluskey and as parent of Southern Textile Corp., and including, but not limited to, the Thermoid Division, is a corporate organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, H.K. PORTER COMPANY, INC., and/or its predecessors, and/or its subsidiary, Southern Textile Corp. and including, but not limited to, the Thermoid Division, mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, cloth, tape, yarn/cord, felt, rope/wick, tubing and amosite blankets such as Portersite, Portersite G, Porterlag, and other cloth such as Thermagard, Cleangard, Covergard, Flamegard, Guardian, Heatgard, Splashgard, Weldgard, Insulgard, and Soundgard.

(124) Defendant, HOPEMAN BROTHERS, INC., is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 435 Essex Avenue, P.O. Box 820, Waynesboro, VA 22980 which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania, with a registered office situate at 123 South Broad Street, Philadelphia, Pennsylvania 19109. At all times material hereto, defendant, HOPEMAN BROTHERS, INC., manufactured, supplied, produced, and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos wallboard, including Marnite.

(125) Defendant, HUXLEY DEVELOPMENT CORP., is a corporation with a principal office located at 1133 Avenue of Americas, New York 10036 and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant HUXLEY DEVELOPMENT CORPORATION, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined

asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(126) Defendant, INDUSTRIAL PRODUCTS COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business at 21 Cabot Boulevard, Langhorne, Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, INDUSTRIAL PRODUCTS COMPANY, manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiff, and/or to sub-contractors on his job site, asbestos products and materials to which plaintiff was exposed.

(127) Defendant INDUSTRIAL SALESMAN is a corporation organized and existing under the laws of the state of New Jersey with its principal place of business in New Jersey. At all times material hereto defendant INDUSTRIAL SALESMAN manufactured, supplied, produced, and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs asbestos cloth and friction products.

(128) Defendant, INSULATION MATERIAL, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, INSULATION MATERIAL, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(129) Defendant, INSULATION PRODUCTS CORPORATION, is a corporation organized and existing under the laws of the State of Pennsylvania and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, Defendant, INSULATION PRODUCTS CORPORATION, mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs asbestos products including but not limited to various sizes of asbestos pipe insulation.

(130) Defendant, INTERNATIONAL HARVESTER COMPANY, is a corporation organized and existing under the laws of the State of Delaware with its principal place of

business in Illinois which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, INTERNATIONAL HARVESTER COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates, other friction products and asbestos gaskets, packing and sealing devices.

(131) Defendant, JACQUAYS ASBESTOS COMPANY, is a corporation organized and existing under the laws of the State of Arizona, having its principal place of business in the State of Arizona which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, JACQUAYS ASBESTOS COMPANY, during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(132) Defendant, J. H. FRANCE REFRACTORIES CO. is a corporation organized and existing under the laws of Commonwealth of Pennsylvania, is a citizen and resident of the Commonwealth of Pennsylvania, has its principle place of business in the Commonwealth of Pennsylvania, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, J.H. FRANCE REFRACTORIES CO., mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(133) Defendant, JOHN CRANE-HOUDAILLE, INC., formerly Crane Packing Company, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Illinois, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, JOHN CRANE - HOUDAILLE, INC., manufactured, produced and sold either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products including, but not limited to, mechanical seals and

sealing devices, pumps, machine and industrial tools and packing. At all times material hereto, Defendant, JOHN CRANE - HOUDAILLE INC., formerly Crane Packing Company, manufactured, distributed and supplied asbestos products of some or all of the various other defendants named herein.

(134) Defendant, J. P. STEVENS, INC., is a corporation organized and existing under the Laws of the State of Delaware, with its principal place of business in New York and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, J. P. STEVENS, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos cloth, blankets, lagging, pad cloth and other textile products.

(135) Defendant, J. W. ROBERTS, LTD., is a corporation organized and existing under the laws of Great Britain, with its principal place of business at 20 St. Mary's Parsonage, Manchester, England, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant J. W. ROBERTS, LTD., manufactured, produced and sold either directly or indirectly in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to the contractors at job sites on which plaintiffs worked, asbestos products including, but not limited to "Limpet" spray asbestos.

(136) Defendant, KANE BROTHERS, is a corporation organized and existing under the laws of the State of Ohio with a principal place of business at 457 A Street, Sharon, PA 16146 which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, KANE BROTHERS, manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to plumbing supplies and materials that contained asbestos to which plaintiffs were exposed.

(137) Defendant, KAY WHEEL SALES is a corporation organized and existing under the laws of the State of Pennsylvania, and is a citizen and resident of the State of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times it

sold asbestos-containing friction products to which plaintiffs were exposed.

(138) Defendant, KEENE CORPORATION, sued in its corporate capacity and as successor by purchase of certain assets of Mundet Cork Corporation, is successor by merger to Keene Building Products Corporation, which was successor by merger to Baldwin-Ehret-Hill, Inc., which was organized and existing under the laws of the Commonwealth of Pennsylvania, and which was successor by merger to Ehret Magnesia Manufacturing Company, which was formerly a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in New York and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, KEENE CORPORATION, and/or its predecessors, including, Mundet Cork Corporation, Keene Building Products Corporation, Baldwin-Ehret-Hill, Inc., and/or Ehret Magnesia Manufacturing Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Thermasil Pipecovering and Block, Monoblock Pipecovering and Block, Thermalite Pipecovering and Block, Enduro Block, Superpowerhouse Cement, Powerhouse Cement, BEH No. 1 Plus Insulating Cement, Bondtite Cement, Thermasil Cement, Pyrospray Types I, T, S, MonoSpray, Fibrekote, Ehret Asbestos Sponge Felt, Aircell Pipecovering and Block, and asbestos gaskets, packing and sealing devices.

(139) Defendant, LAC D'AMIANTE DU QUEBEC, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Canada, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, LAC D'AMIANTE DU QUEBEC, during all times material to this Complaint, and for long time prior thereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, milled asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(140) Defendant, LEAR SIEGLER, INC., including, but not limited to, any Brake Products Divisions, sued

in its corporate capacity and as successor by merger to Royal Industries, Inc., which was successor to Century Engineers, which was organized and existing under the laws of the State of California, and which reincorporated and was organized and existing under the laws of the State of Delaware, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in California and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, LEAR SIEGLER INC., and/or its predecessors including, Royal Industries, Inc., and Century Engineers, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(141) Defendant, LEHIGH VALLEY RAILROAD COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, whose principal place of business and address for service of process is 415 Brighton Street, Bethlehem, Pennsylvania 19017 and is a citizen of the Commonwealth of Pennsylvania and doing business in the Commonwealth of Pennsylvania. LEHIGH VALLEY RAILROAD COMPANY operated a railroad which employed certain plaintiffs.

(142) Defendant, LEHIGH VALLEY REFRACTORIES, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, LEHIGH VALLEY REFRACTORIES, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(143) Defendant, LENCO, INC., is a corporation duly organized and existing under the laws of the State of Missouri, with its principal place of business at 319 West Main Street, Jackson Missouri. At all times material hereto, defendant, LENCO, INC., produced, distributed, manufactured, and/or sold asbestos products to the employers of the plaintiffs or its predecessors including, but not limited to, asbestos containing jackets, cape sleeves and aprons.

(144) Defendant, LEONARD J. BUCK, INC. is a corporation organized and existing under the laws of the State of Delaware, has its principal place of business in the State of Delaware and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, LEONARD J. BUCK, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(145) Defendant, MACK TRUCKS, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District Pennsylvania. At all times material hereto, Defendant, MACK TRUCKS, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to employers of the plaintiffs and/or to contractors on jobsites on which plaintiffs worked, asbestos products, including but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch pads and other friction products.

(146) Defendant, MANUFACTURED RUBBER PRODUCTS COMPANY, is a corporation duly authorized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania with a principal place of business at 4501 Tacony Street, Philadelphia, Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, MANUFACTURED RUBBER PRODUCTS COMPANY, produced, manufactured, distributed and/or sold either directly or indirectly, to the employers of the plaintiffs or its predecessors, asbestos products including, but not limited to, asbestos paper.

(147) Defendant, MAREMONT CORPORATION, formerly known as Maremont-Delaware, Inc., is a corporation organized and existing under the laws of the State of Illinois, with its principal place of business in Illinois and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, MAREMONT CORPORATION, and/or its predecessors, including, MaremontDelaware, Inc., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes,

brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(148) Defendant, McCORD GASKET COMPANY is a corporation organized and existing under the laws of the State of Michigan and is authorized to do business in Pennsylvania, and at all times material hereto was conducting business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant McCORD GASKET COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(149) Defendant, MELRATH GASKET COMPANY, INC., is a wholly-owned subsidiary of Melrath Gasket Holding Company, Inc., a Pennsylvania corporation, a/k/a a TNT Liquidating Co. At all times material hereto, Defendant MELRATH GASKET COMPANY, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(150) Defendant, MELRATH GASKET HOLDING COMPANY, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. On August 28, 1983, MELRATH GASKET COMPANY, INC., became a wholly-owned subsidiary of MELRATH GASKET HOLDING COMPANY, INC., a Pennsylvania Corporation, a/k/a TNT Liquidating Company.

(151) Defendant, MERIDEN MOLDED PLASTICS, INC., is a corporation organized and existing under the laws of the State of Connecticut, with its principal place of business in Connecticut which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant MERIDEN MOLDED PLASTICS, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(152) Defendant MOHAWK MANUFACTURING is a corporation organized and existing under the laws of Illinois, with its principal place of business in Illinois, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times it

manufactured and sold asbestos-containing friction products to which plaintiffs were exposed.

(153) Defendant, MONSEY PRODUCTS, is a corporation organized and existing under the laws of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times it manufactured and/or sold asbestos-containing friction products to which plaintiffs were exposed.

(154) Defendant MOTOR SERVICES is a corporation organized and existing under the laws of the State of New York, with its principal place of business in the State of New York, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times it manufactured and/or sold asbestos-containing friction products to which plaintiffs were exposed.

(155) Defendant, NATIONAL GYPSUM COMPANY, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Texas which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, NATIONAL GYPSUM COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Thermacoustic, Sprayolite, Fireshield, Macoustic, Texas Texture, Perfolyte, joint compounds, joint cements, toppings, textures, spackles, plasters, siding, roofing, and Gold Bond products.

(156) Defendant, NATIONAL RAILROAD PASSENGER CORPORATION is a corporation organized and existing under the laws of Washington, D.C., whose address for service of process is 1617 J.F.K. Boulevard, Room 710, Philadelphia, Pennsylvania 19104. National Railroad Passenger Corporation is and has been since October 30, 1970 a common carrier by rail and is liable to the plaintiffs as his employer since that date under the Federal Employer's Liability Act and/or as a result of the obligation placed upon it by the Rail Passenger Service Act as amended and/or as the purchaser of and successor to Penn Central Corporation's railroad operations. NATIONAL RAILROAD PASSENGER CORPORATION operated a railroad which employed certain plaintiffs.

(157) Defendant, NATIONAL U.S. BOILER CO., INC., is a Pennsylvania Corporation with a principal place of business in New Castle, PA. At all times material hereto, defendant, NATIONAL U.S. BOILER CO., INC.,

manufactured, produced, sold and supplied, either directly or indirectly or through its predecessors, to the employer of the plaintiffs, asbestos National U.S. Boiler products.

(158) Defendant, NAVISTAR is a corporation organized and existing under the laws of the State of Delaware, is a citizen and resident of the State of Delaware, has its principal place of business in a State other than New Jersey or Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Navistar is successor by name change to International Harvester Company. At all times material hereto, defendant, NAVISTAR manufactured, produced, sold and supplied, either directly or indirectly or through its predecessors, to the employer of the plaintiffs, asbestos automotive products including, but not limited to brakes, brake linings, clutches, clutch facings, gaskets and other friction materials.

(159) Defendant, NEW YORKER STEEL BOILER COMPANY, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, NEW YORKER STEEL BOILER COMPANY, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(160) Defendant, NICOLET, INC., formerly known as Nicolet Industries, Inc., sued in its corporate capacity and as successor by purchase of certain assets of Keasbey & Mattison's Asbestos Products Division, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, NICOLET, INC., formerly known as Nicolet Industries, Inc., and/or its predecessors including Keasbey & Mattison, mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, 7M Cement, millboard, paper, sheet packing, cement boards, pipecovering and block including, but not limited to, Norriscell Corrugated Paper, Nicobestos, Nicospec, Nicosat, Nicolam, SBR Sheets, Kon-X, Nicoseal, as well as 85% Magnesia Pipecovering and Block, Zebra Pipecovering, Kaytherm Pipecovering and Block, Kaytherm 1700 Pipecovering, Hytemp Pipecovering and Block, Bestfeld

Pipecovering, Aircell Pipecovering and Block, and other asbestos products, including, but not limited to, asbestos gaskets, packing and sealing devices. At all times relevant hereto NICOLET was the alter ego, parent company, and sole stockholder and in full control of Nicolet Asbestos Mines, Ltd., which company mined, manufactured, processed, imported, converted, compounded, sold, supplied or delivered substantial amounts of asbestos and asbestos related materials for use, processing, or manufacturing in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times relevant hereto, this action is brought against NICOLET as the legal successor to Keasbey & Mattison based on one or more of the following factors: NICOLET's purchase of one or more of Keasbey & Mattison's division; NICOLET's purchase of some or all of the assets of Keasbey & Mattison's industrial products division; NICOLET's purchase of land, buildings, machinery, equipment, inventory, business records, materials, supplies, processes, patents, and trademarks of Keasbey & Mattison; NICOLET's purchase of Keasbey & Mattison's good will and the right to use Keasbey's name; NICOLET's employment of some of Keasbey & Mattison's key personnel; NICOLET's continuing to manufacture some of Keasbey & Mattison's products, NICOLET holding itself out as and/or advertising itself has an ongoing enterprise of Keasbey & Mattison; NICOLET's continuation of the Keasbey & Mattison product line; and NICOLET's continuing sales to Keasbey & Mattison customers. This action is further brought against NICOLET as successor to Keasbey & Mattison as a matter of public policy under the product liability laws of the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times relevant hereto NICOLET, INC. was the alter ego, parent company, and sole stockholder and in full control of Nicolet Asbestos Mines, Ltd. which company mined, manufactured, processed, imported, converted, compounded, sold, supplied or delivered substantial amounts of asbestos and asbestos related materials for use, processing, or manufacturing in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania.

(161) Defendant, NIMCO BUS SALES AND BUS PARTS, is a corporation duly organized and existing under the laws of the State of New Jersey with its principal place of business at 252 Doremus Avenue, Newark, New Jersey. At all times material hereto, defendant NIMCO BUS SALES AND BUS PARTS produced, manufactured, distributed and/or sold, either directly or indirectly to the employers of the plaintiffs or its predecessors, asbestos friction products including, but not limited to, brake pads and brake shoes.

(162) Defendant, NORCA CORPORATION, is a corporation organized and existing under the laws of the State of New York with its principal place of business in New York, which is doing business in the Commonwealth of

Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, NORCA CORPORATION, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at jobsites on which plaintiffs worked, when they were exposed to said asbestos products.

(163) Defendant, NORTH AMERICAN ASBESTOS COMPANY, is a corporation organized and existing under the laws of the State of Illinois, is a citizen of the State of Illinois, and at all times material to this Complaint, was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. The defendant was dissolved but was the alter ego of defendants CAPE ASBESTOS FIBRES, LTS., CAPE ASBESTOS INDUSTRIES, LTD., CAPE INDUSTRIES, LTD., among others.

(164) Defendant, NOSROC CORPORATION, sued in its corporate capacity and as successor in interest to G.W.H. Corson, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business c/o G & W.H. Corson, Inc., Joshua Road and Stenton Avenue, Plymouth Meeting, Pennsylvania 19462 which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania with a registered office situate at 123 South Broad Street, Philadelphia, Pennsylvania 19109. At all times material hereto, defendant, NOSROC CORPORATION, and its predecessors, including, but not limited to, G.W.H. Corson, was the sole distributor of the asbestos products mined, manufactured, produced, and sold by various of the defendants named herein, including, but not limited to, Ehret-Magnesia, Baldwin-Ehret-Hill, and Keene Corporation, including, but not limited to Kilboard, Superpowerhouse Cement, Powerhouse Cement, B.H. #1 Insulating Cement, PyroSpray, and other asbestos products, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when he was exposed to said asbestos products.

(165) Defendant, NUTURN CORPORATION, is a corporation duly organized and existing under the laws of the State of Tennessee with its principal place of business in at 570 Metroplex drive, Nashville, Tennessee which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, NUTURN CORPORATION, produced, manufactured, distributed, and/or sold, either directly or

indirectly to the employers of the plaintiffs, asbestos products including, but not limited to, brake linings, brake shoes, other friction products, World Bestos Transit Mix or Carlisle B33 Mix. Defendant, NUTURN CORPORATION, is also sued as successor by purchase of the Brake Systems Division of Maremont Corporation in 1977.

(166) Defendant NYCAL is a corporation organized and existing under the laws of New York with its principal place of business in New Jersey, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times, it sold asbestos-containing friction products to which plaintiffs were exposed.

(167) Defendant, OWENS-CORNING FIBERGLAS CORP., sued in its corporate capacity and as successor by purchase of the Kaylo Division of Owens-Illinois Glass Company, now known as Owens-Illinois, Inc., is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Ohio and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, OWENS-CORNING FIBERGLAS CORP., and/or its predecessors, including, the Kaylo Division of Owens-Illinois Glass Company, now known as Owens-Illinois, Inc., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Kaylo Pipecovering and Block, Kaylo 20 Pipecovering and Block and 660 Cement. Furthermore, No. 100 Asbestos Cement (hard finish), No. 303 Asbestos Cement, MW-50 Cement, No. 707 Insulating Cement, Thermotex-B Insulating Cement, and other asbestos products, including, but not limited to, asbestos gaskets, packing and sealing devices. Defendants predecessor, Philip Carey Corporation, maintained a contracting unit that installed and/or repaired asbestos products in the vicinity in which plaintiffs worked during his employment.

(168) Defendant, OWENS-ILLINOIS GLASS CO., is an Ohio Corporation with a principal place of business at 460 N. Gulph Road, King of Prussia, Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, OWENS-ILLINOIS GLASS CO., formerly known as Owens-Illinois Glass Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(169) Defendant, OWENS-ILLINOIS, INC., formerly known as Owens-Illinois Glass Company, is a corporation

organized and existing under the laws of the State of Ohio, with its principal place of business in Ohio and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, OWENS-ILLINOIS, INC., formerly known as Owens-Illinois Glass Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Kaylo insulation material and Kaylo Pipecovering and Block.

(170) Defendant, PARS MANUFACTURING COMPANY, sued in its corporate capacity and as a successor in interest to Pars Manufacturing Company, a proprietorship, and LAUGHTON PARSONS GASKET MANUFACTURING COMPANY, a proprietorship, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times, materials hereto, Defendant, PARS MANUFACTURING COMPANY, and/or its predecessors manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos containing products, particularly high temperature ceiling gaskets, including but not limited to, folded gaskets, die cut gaskets, braided and twisted packings and rope, cloth and various textiles, woven and bolt hole tape, wick, tubing, blankets, curtains, gloves, "tadpole tape", sewed asbestos gaskets, industrial and marine brake linings and Teflon impregnated asbestos packings. In addition, Defendant, PARS MANUFACTURING COMPANY and/or its predecessors were manufacturers, distributors and suppliers of some or all of various other defendants named herein.

(171) Defendant, PARSONS SALES COMPANY, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, PARSONS SALES COMPANY, INC., and/or its predecessors, manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(172) Defendant, PEERLESS INDUSTRIES, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of

business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PEERLESS INDUSTRIES, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(173) Defendant, PELTZ ROWLEY CHEMICALS COMPANY sued in its corporate capacity and as successor to George A. Rowley & Co., Inc., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PELTZ ROWLEY CHEMICALS COMPANY and/or its predecessors, including George A. Rowley & Co., Inc., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos and/or asbestos products.

(174) Defendant, PENN CENTRAL CORPORATION is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, whose address for purposes of service is IVB Building, 1700 Market Street, Philadelphia, Pennsylvania 19103. Penn Central Corporation is the corporation which arose out of the reorganization of the Penn Central Transportation Company and as such is liable for the Federal Employers' Liability Act claim of the plaintiffs against Penn Central Transportation Company, a common carrier by rail. PENN CENTRAL CORPORATION operated a railroad which employed certain plaintiffs.

(175) Defendant, PENNSYLVANIA BRAKE BONDING, is a corporation duly authorized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania with a principal place of business at 9001 Torresdale Avenue, Philadelphia, Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, PENNSYLVANIA BRAKE BONDING, produced, manufactured, distributed and/or sold either directly or indirectly, to the employers of the plaintiffs and/or its predecessors, asbestos products including, but not limited to, asbestos containing friction products.

(176) Defendant, PENN VALVE & FITTING CORPORATION, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the

Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PENN VALVE & FITTING CORPORATION, manufactured, produced and sold either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products including, but not limited to, mechanical seals and sealing devices, packing and gaskets.

(177) Defendant, PFIZER INC., is a corporation organized and existing under the laws of the State of Connecticut with its principal place of business in New York which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, PFIZER INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to asbestos spray insulation.

(178) Defendant, PITTSBURGH CORNING CORPORATION, sued in its corporate capacity and as successor by purchase of the Insulation Division of Union Asbestos and Rubber Company, now known as Unarco Industries, Inc., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with a principal place of business in Pennsylvania and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PITTSBURGH CORNING CORPORATION, and/or its predecessors, including, Union Asbestos and Rubber Company, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Unibestos Pipecovering and Block.

(179) Defendant, PORTER HAYDEN CO., is a corporation organized and existing under the laws of the State of Maryland, with its principal place of business in Maryland and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PORTER HAYDEN CO., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, friction materials, asbestos gaskets, packing and sealing devices.

(180) Defendant, PPG INDUSTRIES, is a corporation organized and existing under the laws of the

Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, PPG INDUSTRIES, INC., as the one-half equitable owner of Pittsburgh-Corning Corporation, acquired the assets of Union Asbestos and Rubber Company in 1962 and, through Pittsburgh-Corning Corporation, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, as asbestos products, including, but not limited to, Unibestos Pipecovering. In addition, PPG Industries, Inc., is sued in its capacity as a manufacturer and/or distributor of "Pyrocal", an asbestos-containing insulation product, between 1968 and 1971.

(181) Defendant, QUIGLEY COMPANY INC., is a subsidiary of Pfizer, Inc., and is a corporation organized and existing under the laws of the State of New York, with its principal place of business in New York which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, QUIGLEY COMPANY, INC., a subsidiary of Pfizer, Inc., mined, manufactured, produced, sold and supplied, either directly or indirectly to the employers of the plaintiffs asbestos products including, but not limited to Insulag-AF.

(182) Defendant QUINT CORPORATION is a corporation organized and existing under the laws of Pennsylvania, with its principal place of business in Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, QUINT CORPORATION, a subsidiary of Pfizer, Inc., mined, manufactured, produced, sold and supplied, either directly or indirectly to the employers of the plaintiffs asbestos products.

(183) Defendant, RAND MINES, LTD., is a corporation organized and existing under the laws of South Africa and at all times material to this Complaint was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. This defendant is sued in its corporate capacity and as successor in interest to Cape Asbestos S.A. (Pty) Ltd., Amosa (Pty), Ltd., Cape Blue Mines (Pty), Ltd. and/or Egnep, Ltd.

(184) Defendant, RAYMARK INDUSTRIES, INC., is a corporation organized and existing under the laws of the State of Connecticut, with its principal place of business in Connecticut and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of

Pennsylvania. At all times material hereto, Defendant, RAYMARK INDUSTRIES INC., mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Allbestos Tape, Sealsafe Tape, Glassbestos Cloth and Tape, Gator Tape, Novatex Cloth and Fabric, Speedlag Cloth Adhesive and other cloth, asbestos rope, wick and yarn and fabrics, including, but not limited to, Terrybestos, Fluorobestos, Goldbestos, Micabestos, Novabestos, Polybestos, Pyrotex, Novatex, Rhinobestos, Silvabestos and Tribestos and other asbestos products, including, but not limited to, asbestos gaskets, packing and sealing devices and asbestos paper, asbestos blankets, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(185) Defendant, THE READING COMPANY is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, whose address for purposes of service is 1 North 12th Street, Philadelphia, Pennsylvania 19107. The Reading Company is the corporation which arose out of the reorganization of the Reading Company and as such is liable for the Federal Employer's Liability Act claim of the plaintiffs against the Reading Company, a common carrier by rail. THE READING COMPANY operated a railroad which employed certain plaintiffs.

(186) Defendant, RICHARD KLINGER COMPANY, is a corporation organized and existing under the laws of the State of Ohio and is a citizen and resident of the State of Ohio and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, Defendant, RICHARD KLINGER COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos containing products.

(187) Defendant, RILEY STOKER CORPORATION, sued in its corporate capacity, is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with its principal place of business in Massachusetts which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, RILEY STOKER CORPORATION manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos

containing products including, boilers, furnaces and other equipment which contained asbestos containing components.

(188) Defendant R-M FRICTION MATERIALS COMPANY is a corporation organized and existing under the laws of the State of Connecticut, with its principal place of business in Connecticut and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, R-M FRICTION MATERIALS COMPANY, mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(189) Defendant, ROBERT A. KEASBEY CO. is a corporation organized and existing under the laws of a state other than the State of New Jersey or the Commonwealth of Pennsylvania, is a citizen and resident of a state other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business in a state other than the State of New Jersey or the Commonwealth of Pennsylvania, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ROBERT A. KEASBEY CO. mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiff, asbestos products.

(190) Defendant, ROCK BESTOS CO., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ROCK BESTOS CO., mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to asbestos insulated electric cables.

(191) Defendant, ROCKWELL INTERNATIONAL, is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business at 600 Grant Street, Pittsburgh, Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant ROCKWELL INTERNATIONAL produced, manufactured, distributed and/or sold, either directly or

indirectly to Septa or its predecessors, and/or the employers of plaintiffs, asbestos friction products including, but not limited to, asbestos brakes, brake shoes, brake assemblies, brake linings and clutch plates. In addition, plaintiffs were exposed to asbestos friction products used in GRUMMAN an/or flexible buses. This defendant sold those asbestos friction products for use on GRUMMAN or Flexible buses.

(192) Defendant, ROCK WOOL MFG. CO., is a corporation organized and existing under the laws of the State of Delaware, is a citizen and resident of the State of Delaware, has its principle place of business in the State of Delaware, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, ROCK WOOL MANUFACTURING CO., manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products including, but not limited to Delta-Maid One Shot Insulating Cement and Delta-Maid Hi-Temp Master Insulating Cement.

(193) Defendant, ROGERS CORPORATION is a corporation organized and existing under the laws of the State of Connecticut and at all times material hereto was conducting business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ROGERS CORPORATION, manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiff, and/or to sub-contractors on their job sites, asbestos products.

(194) Defendant, ROYAL ELECTRIC SUPPLY CO., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, ROYAL ELECTRIC SUPPLY CO., mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to insulation block diatomoceous silicia, brake linings including but not limited to those manufactured by Cutler Hammer, and industrial brake blocks including but not limited to those manufactured by Clark Control.

(195) Defendant SAGER CORPORATION is a corporation organized and existing under the laws of Illinois with a principal place of business in Illinois which is doing business in the Commonwealth of Pennsylvania and in

the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, SAGER CORPORATION, manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiff, and/or to sub-contractors on their job sites, asbestos products and materials, including, but not limited to, asbestos gloves, to which plaintiffs were exposed.

(196) Defendant, SEPCO CORPORATION, is a corporation organized and existing under the laws of the State of Alabama with its principal place of business in Alabama which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, SEPCO CORPORATION manufactured, produced and sold, either directly or indirectly in the geographical area in which plaintiffs worked and/or to employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked asbestos products including but not limited to insulation, gaskets, gasketing materials and packing.

(197) Defendant, SID HARVEY MIDATLANTIC, INC., is a Pennsylvania Corporation with its principal place of business located in King of Prussia, Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, SID HARVEY MIDATLANTIC, INC., manufactured, produced, mined, distributed and/or sold, and placed into the stream of commerce, either directly or indirectly to the employers of the plaintiff, and/or to sub-contractors on their job sites, asbestos products.

(198) Defendant, SMITH OF PHILADELPHIA, is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen of the Commonwealth of Pennsylvania with a principal place of business at 811 East Cayuga Street, Philadelphia, Pennsylvania, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, said corporation distributed asbestos board and insulating compound and asbestos friction products including but not limited to brakes, brake linings, disc pads, etc., and predecessors for use at the Courtland Depot and other depots.

(199) Defendant, SMS AUTOMOTIVE PRODUCTS, is a Pennsylvania corporation with an office at 4819 Langdon Street, Philadelphia, PA 19124, which does business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant SMS AUTOMOTIVE PRODUCTS INCORPORATED, manufactured, produced and sold, either directly or indirectly in the geographic area in which plaintiffs worked and/or to the

employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch facings and other friction products.

(200) Defendant, SOSMETAL PRODUCTS, INC. is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, is a citizen and resident of the Commonwealth of Pennsylvania, has its principal place of business in the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto defendant, SOSMETAL PRODUCTS INC., manufactured, produced, sold and supplied, either directly or indirectly or through its predecessors, to the employer of the plaintiffs, asbestos automotive products including, but not limited to brakes, brake linings, clutches, clutch facings, gaskets and other friction materials.

(201) Defendant, SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY is a transportation authority created as an agency and instrumentality of the Commonwealth of Pennsylvania by the Metropolitan Transportation Authority Act of 1963, whose principal place of business and address for process of service is 130 S. 9th Street, 5th Floor, Philadelphia, Pennsylvania 19107. SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY operated a railroad which employed certain plaintiffs.

(202) Defendant, SOUTHERN TEXTILE CORP., formerly known as Southern Asbestos Company, sued in its corporate capacity and as a subsidiary of H. K. Porter Co., Inc., is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in North Carolina and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, SOUTHERN TEXTILE CORP., and/or its predecessors, including, Southern Asbestos Company, and/or its successors, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, cloth, tape, yarn/cord, felt, rope/wick, tubing, amosite, blankets such as Portersite and Porterlag, and other cloth such as Thermagard, Cleangard, Covergard, Flamegard, Guardian, Heatgard, Splashgard, Weldgard, Insulgard, and Soundgard.

(203) Defendant, SPECIAL MATERIALS, INC., is a corporation organized and existing under the laws of the State of Wisconsin, with its principal place of business in

Wisconsin which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, SPECIAL MATERIALS, INC., has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds (hereinafter collectively referred to as "asbestos products") in the geographical area in which plaintiffs worked and/or to employers of plaintiffs.

(204) Defendant, SPRAYON RESEARCH CORPORATION is a corporation organized and existing under the laws of the State of Florida, is a citizen and resident of the State of Florida, and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, SPRAYON RESEARCH CORPORATION, manufactured, produced, sold and/or supplied either directly or indirectly to the employer of the plaintiffs, asbestos products, including, but not limited to Sprayon.

(205) Defendant, STRAHMAN VALVES, INC., is a corporation organized and existing under the laws of the State of New Jersey with its principal place of business in New Jersey and is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, STRAHMAN VALVES, INC., manufactured, produced, sold and/or supplied either directly or indirectly to the employer of the plaintiffs, asbestos products.

(206) Defendant, STEARN'S DIV. F.M.C. CORP., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, STEARN'S DIV. F.M.C. CORP., mined, manufactured, produced and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to asbestos clutches and brakes.

(207) Defendant, STUDEBAKER-WORTHINGTON, INC. is a corporation organized and existing under the State of Delaware, with its principal place of business in Delaware. Studebaker-Worthington, Inc. acquired the assets, the

product line(s), and assumed the liabilities of Alco Products, Inc., Worthington Pump & Machinery Corporation, Worthington Corporation and American Locomotive Company and/or was doing business at all material times as that corporation and/or was the alter-ego of Alco Products, Inc., Worthington Pump & Machinery Corporation, Worthington Corporation and American Locomotive Company and/or had exerted such dominion and control over Alco Products, Inc., Worthington Pump & Machinery Corporation, Worthington Corporation and American Locomotive Company as to make it its agent or instrumentality and/or held a majority of the common stock of Alco Products, Inc., Worthington Pump & Machinery Corporation, Worthington Corporation and American Locomotive Company and/or at material times hereto, Alco Products, Inc., Worthington Pump & Machinery Corporation, Worthington Corporation and American Locomotive Company was a wholly-owned subsidiary of Studebaker-Worthington, Inc. and/or is the predecessor-in-interest to Studebaker-Worthington, Inc. and/or was doing business at all material times as said corporations, within the State of Delaware, and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania, with its service of process at c/o Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

(208) Defendant, THERMAL MATERIALS CORP., is a corporation organized and existing under the laws of the State of New Jersey with its principal place of business in New Jersey and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant THERMAL MATERIALS CORP., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to the contractors on job sites which plaintiffs worked, asbestos products.

(209) Defendant, TNT LIQUIDATING COMPANY, sued in its own right and as successor to MELRATH SUPPLY AND GASKET CO., INC., and TANNETICS, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant TNT LIQUIDATING COMPANY and/or its predecessor MELRATH SUPPLY AND GASKET CO., INC., and for TANNETICS, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to the contractors on job sites which plaintiffs worked, asbestos products, including but not limited to, mechanical seals and sealing devices, packing and gaskets. TNT LIQUIDATING COMPANY filed Articles of Dissolution on January 31, 1985.

(210) Defendant, TRANSCO, INC., is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Illinois, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, TRANSCO, INC., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(211) Defendant, TRANSVAAL CONSOLIDATED LAND & EXPLORATION CO., LTD. is a foreign corporation organized and existing under the laws of a jurisdiction other than the State of New Jersey or the Commonwealth of Pennsylvania, has its principal place of business in Johannesburg, South Africa and at all times material hereto was doing business in the State of New Jersey and in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. It also maintains an office at, and does business through defendant Charter Consolidated's headquarters in London, England. In June of 1979 the defendant Transvaal Consolidated purchased the assets and liabilities of these members of the Cape Industries Group who mined and shipped asbestos. Defendant Transvaal Consolidated is the alter ego and is the successor to the Cape Industries Group, North American Asbestos Corp., and Associated Minerals Corp., and is responsible for their tortious acts and omissions by virtue of the fact that it directed their policies and actions in a manner and/or for the purpose of committing a fraud, circumventing the law and/or otherwise defeating the ends of justice.

(212) Defendant, TURNER ASBESTOS FIBRES, LTD., is a corporation organized and existing under the laws of England with its principal place of business at 20 St. Mary's Parsonage, Manchester, M3, 2NL, England. At all times material hereto, Defendant, TURNER ASBESTOS FIBRES, LTD., manufactured, distributed and/or supplied asbestos products, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked when they were exposed to said asbestos products.

(213) Defendant, TURNER & NEWALL, LTD., including, but not limited to, any of its affiliated companies and or its former subsidiaries, and including, but not limited to, its subsidiary and mere alter ego at certain times material hereto, Keasbey & Mattison, is a corporation organized and existing under the laws of Great Britain, located at 20 St. Mary's Parsonage, Manchester, England M22-EA, and at all times material to this Complaint, was

doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times hereto, Defendant, TURNER & NEWALL LTD., and/or its affiliated companies and/or its subsidiaries including, Keasbey & Mattison, mined, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, raw asbestos and "limpet" spray asbestos. At all times relevant hereto TURNER & NEWALL, LTD. was the alter ego, parent company, and sole stockholder and in full control of Keasbey & Mattison which company mined, manufactured, processed, imported, converted, compounded, sold, supplied or delivered substantial amounts of asbestos and asbestos related materials for use, processing, or manufacturing in the Commonwealth of Pennsylvania.

(214) Defendant, UNION CARBIDE CORPORATION, is a corporation organized and existing under the laws of the State of New York, with its principal place of business in * and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, UNION CARBIDE CORPORATION, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products.

(215) Defendant, UNIROYAL, INC., is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business in * and is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, UNIROYAL, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked, and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products, and asbestos cloth.

(216) Defendant, UNITED STATES GYPSUM COMPANY, is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Illinois which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, UNITED STATES GYPSUM COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in

which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, Accoustone, Firecode Spray, K-Fac 19 block, textures, joint compounds, plasters, toppings, spackle and Red Top products.

(217) Defendant, UNITED STATES MINERAL PRODUCTS COMPANY, is a corporation organized and existing under the laws of the State of New Jersey with its principal place of business in New Jersey which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, UNITED STATES MINERAL PRODUCTS COMPANY, mined, manufactured, produced and sold either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to CAFCO and other asbestos spray products.

(218) Defendant, UNIVERSAL INSULATION COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, Pennsylvania with its principal place of business in Pennsylvania, and is doing business in the Commonwealth of Pennsylvania, and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, UNIVERSAL INSULATION COMPANY, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, including, but not limited to, as sole distributor of Johns-Manville Products in one of the geographical areas in which plaintiffs worked, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs worked, when they were exposed to said asbestos products.

(219) Defendant, U.S. BRAKELINING CORP., is a corporation organized and existing under the laws of the State of Florida and is a citizen of the State of Florida with its principal place of business in the State of Florida. At all times material hereto, Defendant U.S. BRAKELINING, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos products, including asbestos-containing friction materials, in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(220) Defendant, VERMONT ASBESTOS GROUP, INC., is a corporation organized and existing under the laws of the State of Vermont, having its principal place of business in the State of Vermont which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant VERMONT ASBESTOS GROUP, INC., during all times material to this Complaint, and for a long time prior thereto, has been and/or is now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, milled asbestos, raw asbestos, asbestos fiber, mined asbestos, processed asbestos, material containing asbestos, including, but not limited to, packaged or bagged asbestos, asbestos products and compounds in the geographic area in which plaintiffs worked and/or to employers of plaintiffs.

(221) Defendant, WAGNER ELECTRIC COMPANY, is a corporation duly authorized and existing under the laws of the State of New Jersey with its principal place of business at 100 Misty Lane, Parsippany, New Jersey, which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, WAGNER ELECTRIC COMPANY, manufactured, produced, distributed and/or sold, either directly or indirectly, to the employers of the plaintiffs and/or its predecessors, including, but not limited to, asbestos friction products.

(222) Defendant, WARREN BALDERSTON, is a business organized and existing under the laws of the State of New Jersey and is a citizen and resident of the State of New Jersey and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, WARREN BALDERSTON, mined, manufactured, produced and sold, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to Insulation Felt 50 Waterproof Asbestos.

(223) Defendant, WEIL-McLAIN COMPANY, a division of THE MARLEY COMPANY which is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Kansas which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, WEIL-McLAIN COMPANY, manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked

and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(224) Defendant, WEINSTEIN SUPPLY COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business at Moreland & Davisville Roads, Willow Grove, PA 19090 which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, defendant, WEINSTEIN SUPPLY COMPANY, manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to plumbing supplies and materials that contained asbestos to which plaintiffs were exposed.

(225) Defendant, WESTINGHOUSE ELECTRIC CORPORATION, sued in its corporate capacity and as parent of Westinghouse Canada, Inc., and including, but not limited to, its subsidiary, Westinghouse Air Brake Co., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, and is a citizen of the Commonwealth of Pennsylvania doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, WESTINGHOUSE ELECTRIC CORPORATION, and/or its predecessors and/or its subsidiaries, including, Westinghouse Air Brake Co., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including, but not limited to, asbestos brakes, brake linings, brake blocks, brake discs and pads, clutch plates and other friction products, and asbestos cloth, canvas and other products.

(226) Defendant, WEST PHILADELPHIA ELECTRIC SUPPLY COMPANY, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a citizen and resident of the Commonwealth of Pennsylvania and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, WEST PHILADELPHIA ELECTRIC SUPPLY COMPANY, mined, manufactured, produced sold and supplied, either directly or indirectly to the employers of the plaintiffs at Fairless Hills, Pennsylvania, among other places, asbestos products including but not limited to brake linings, clutches and electrical insulation.

(227) Defendant, WHEELING BRAKE BLOCK MANUFACTURING COMPANY, is a corporation organized and existing

under the laws of the State of Virginia with its principal place of business in the State of Virginia. At all times material hereto, defendant, WHEELING BRAKE BLOCK MANUFACTURING COMPANY, manufactured, produced and/or sold, either directly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(228) Defendant, W.I.C.K., INC. is a corporation organized and existing under the laws of the State of Michigan, is a citizen and resident of the State of Michigan, has its principle place of business in the State of Michigan, and at all times material hereto was doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. Defendant, W.I.C.K., INC. mined, manufactured, produced, sold and/or supplied, either directly or indirectly to the employer of the plaintiffs, asbestos products.

(229) Defendant, WILMINGTON SUPPLY COMPANY OF PENNSYLVANIA, INC., is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, WILMINGTON SUPPLY COMPANY OF PENNSYLVANIA, INC., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(230) Defendant, W.R. GRACE CO., INC., is a corporation organized and existing under the laws of the State of Connecticut with a principal place of business in New York which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, W.R. GRACE CO., INC., manufactured, produced and/or sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, asbestos spray insulation known as Zonalite, Spraytex and other names.

(231) Defendant, YORK INDUSTRIES CORP., formerly known as York Insulation Company, is a corporation organized and existing under the laws of the State of New Jersey with a registered agent located in New Jersey, which is doing business in the Commonwealth of Pennsylvania and the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, YORK INDUSTRIES, INC and/or its

predecessor, York Insulation Company, manufactured, produced and/or sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products including but not limited to aircell materials.

(232) Defendant, YORK-SHIPLEY, INC., a division of ROBINTECH, INC., which is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania which is doing business in the Commonwealth of Pennsylvania and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, YORK-SHIPLEY, INC., directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products.

(b) Defendants who are successor corporations have assumed the assets and liabilities of their predecessors and they are responsible for the liabilities of their predecessors, both as to compensatory damages and as to punitive damages. As used in this Complaint, "defendant(s)" includes, unless expressly stated to the contrary above, all predecessors for whose actions plaintiffs claim the named defendant(s) is(are) liable.

5. (a) At all times material hereto, defendants and/or their predecessors acted through their agents, servants or employees, who were acting within the scope of their employment on the business of the defendants.

(b) The defendants are all corporations, companies or other business entities, which, during all times material hereto, and for a long time prior thereto, have been and/or are now engaged, directly or indirectly, in the mining, milling, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing and/or otherwise placing in the stream of commerce, asbestos, material containing asbestos, asbestos products and asbestos compounds (hereinafter collectively referred to as "asbestos products"). The term "asbestos products," for the purposes of this action, shall include asbestos fiber in any form and manufactured or finished products containing asbestos.

COUNT I - NEGLIGENCE AND OUTRAGEOUS CONDUCT

6. Plaintiffs hereby incorporate by reference paragraphs 1 through 5 inclusive, as if each of said paragraphs were set forth fully hereunder.

7. At all times material hereto, the asbestos products mined, manufactured, produced, processed, compounded, converted, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce by the defendants which the plaintiffs continually worked with, used, handled, and were caused to come into contact with and be exposed to were under the exclusive control of the defendants and, accordingly, plaintiffs invoke the Doctrines of Exclusive Control and Res Ipsa Loquitur.

8. At all times material hereto, defendants knew or should and/or could have known that their asbestos products, as set forth above and in their ordinary and foreseeable use would be used in connection with installation of insulation. In new construction, would be used for installation of insulation in reconstruction and repair, would be used in the manufacture of asbestos products or would be used in a variety of work settings, would be ripped out and/or removed during reconstruction and repair (and that such ripping would initially cause large quantities of asbestos dust and fibers to be released into the atmosphere of the work area for extended periods of time, to be later followed by the additional dust and fibers to be released into the atmosphere of the same work area upon the application of new asbestos products) and that asbestos dust released by those products during their intended and foreseeable use would be brought home by asbestos workers on their work clothes and tools, all of which defendants knew or should have known created hazardous and unsafe work areas and risk to the health of plaintiffs and others similarly situated.

9. At all times material hereto, defendants mined, manufactured, produced, processed, compounded, converted, sold, merchandised, distributed, supplied, and/or otherwise placed in the stream of commerce the said asbestos products, all of which the defendants knew, or in the exercise of ordinary care should and/or could have known, were inherently defective, ultrahazardous, dangerous, deleterious, poisonous and otherwise highly harmful to the plaintiffs, and to other persons similarly situated.

10. At all times material hereto, plaintiffs, and other persons similarly situated in the general community, did not know of the nature and extent of the danger to their lungs, respiratory system, heart, other bodily parts including bone and tissue, and their general health that would result from their contact with and exposure to the defendants' asbestos products and to the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products; and, at all times material hereto, each of the defendants knew, should have known, or could have reasonably determined that the plaintiffs, and other persons similarly situated, would be in contact with and be exposed to the defendants' asbestos

products and to the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products; and, despite such facts, defendants, individually, jointly and severally, as part of the conspiracy as alleged herein and/or as a result of tacit agreement or cooperation and/or as a result of industry-wide standards or practice:

(a) mined, manufactured, produced, processed, compounded, converted, sold, supplied, merchandised, distributed, and/or otherwise placed in the stream of commerce, asbestos products which defendants knew, or in the exercise of ordinary care should and/or could have known, were inherently defective, dangerous, deleterious, ultrahazardous, poisonous and otherwise highly harmful to plaintiffs, and to other persons similarly situated;

(b) affirmatively misrepresented to plaintiffs and other members of the public in advertising, labels and otherwise that their asbestos products were safe in their ordinary and foreseeable use, which material misrepresentation induced plaintiffs to expose themselves to hazards;

(c) failed to take any reasonable precautions or to exercise reasonable care to adequately or sufficiently warn plaintiffs, and other persons similarly situated, of the risks, dangers and harm to which they were exposed by continuous work with, contact with, use, handling, and exposure to defendants' asbestos products and the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(d) failed and omitted to provide the plaintiffs, and other persons similarly situated, with the knowledge of reasonably safe and sufficient safeguards, wearing apparel and proper safety equipment and appliances necessary to protect them from being injured, poisoned, disabled, killed, or otherwise harmed, by working with, using, handling, coming into contact with, and being exposed to the defendants' asbestos products and the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(e) failed and omitted to place warnings, or adequate and sufficient warnings, on the containers of the said asbestos products regarding the risks, dangers, and harm therefrom and the precautions necessary to make said asbestos products safe for their ordinary and foreseeable use by plaintiffs and other persons similarly situated in the general community;

(f) failed to package the said asbestos products so that, in the ordinary and foreseeable use and handling thereof, the plaintiffs, and other persons similarly

situated, would not come into contact with and be exposed to the inhalation of the asbestos dust and fibers from said asbestos products;

(g) failed to take reasonable, sufficient and proper precautions reasonably calculated to reach such persons as the plaintiffs, and other persons similarly situated in the general community, to warn them of the inherently dangerous, deleterious, ultrahazardous, poisonous, and otherwise highly harmful effects of the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of the defendants' asbestos products and to instruct them in the proper and safe use and handling of said asbestos products;

(h) failed to take any reasonable, sufficient and proper precautions or to exercise reasonable care to protect the plaintiffs, and other persons similarly situated, from harm and danger resulting from working with, using, handling, coming into contact with and being exposed to the defendants' asbestos products and the inhalation of the asbestos dust and fibers from the ordinary and foreseeable use of said asbestos products;

(i) failed to adopt and enforce a safe, sufficient and proper plan and method of working with, using, handling, and coming into contact with and being exposed to defendants' asbestos products so that plaintiffs, and other persons similarly situated, would not inhale the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(j) failed to adequately test their respective asbestos products before offering them for sale and use so that plaintiffs, and other persons similarly situated, would not inhale the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(k) failed to render such asbestos products safe or to provide proper and sufficient safeguards for the use and handling thereof so that plaintiffs, and other persons similarly situated, would not inhale the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(l) failed to remove and recall said asbestos products from the stream of commerce and marketplace upon ascertaining that said asbestos products would cause asbestosis, scarred lungs, respiratory disorders, cardiovascular disorders, mesothelioma, lung cancer, other cancers and other injuries, some or all of which are permanent and may be fatal;

(m) failed to comply with the Federal Hazardous Substance Act, 15 U.S.C. 1261 et seq;

(n) failed to advise the plaintiffs, and others similarly situated in the general community, whom the defendants knew and/or should have and/or could have known had been exposed to long-term inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products, to cease all future exposure to the inhalation of all types of other fumes, smoke, dust and fibers, to keep dust and fibers on work clothes and tools away from the home environment, to be examined by a lung specialist to determine the nature and extent of any and all diseases caused by such exposure and inhalation and to receive treatment for such diseases;

(o) defendants did or could have joined together in trade associations or industrial hygiene associations wherein information relative to the hazards of asbestos inhalation was available, but defendants by their actions, withheld such information from the plaintiffs, failed to assimilate such information for distribution to the plaintiffs, distorted such information by watering it down so that sales would not be interfered with, and actively engaged in disseminating counter information;

(p) failed to manufacture or design their products so that said asbestos could or would not be released into the ambient air during their use;

(q) failed to advise plaintiffs and others similarly situated who the defendants knew and/or should have known had been exposed to long-term inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products, of the progressive nature of the disease process to which all defendants were causing them to be subjected;

(r) failed to advise plaintiffs and other similarly situated who the defendants knew and/or should have and/or could have known had been exposed to long-term inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products, to cease all future exposure to the inhalation of all types of other fumes, smoke, dust and fibers and to be examined by a lung specialist to determine the nature and extent of any and all diseases caused by such exposure and the inhalation of asbestos dust and fibers and to receive treatment for such diseases.

(s) were otherwise careless and negligent under the law.

COUNT II - STRICT LIABILITY

11. Plaintiffs hereby incorporate by reference paragraphs 1 through 10 inclusive, as if each of said paragraphs were set forth fully hereunder.

12. Defendants, acting individually, jointly and severally, as part of the conspiracy as alleged herein and/or as a result of tacit agreement or cooperation and/or as a result of industry-wide standards or practice knew, or in the exercise of reasonable care should and/or could have known, that their asbestos products would be sold to the public, including employers of the plaintiffs and others similarly situated, and would be used by plaintiffs, and other persons similarly employed in the general community, and would be relied upon by such persons to be fit for the use and to accomplish the purpose for which they were mined, manufactured, produced, processed, sold, supplied, distributed and/or otherwise placed in the stream of commerce; and the defendants, because of their positions as miners, manufacturers, producers, processors, sellers, suppliers and distributors, are strictly liable to the plaintiffs, for the following reasons:

(a) Defendants, as manufacturers-sellers, are engaged in the business, inter alia, of selling asbestos products;

(b) At the time of the manufacture and sale of the said asbestos products by the defendants to the plaintiffs or plaintiffs' employers, defendants knew, or had reason to know, that the said asbestos products would be used by plaintiffs, and other persons similarly situated, as the ultimate users or consumers;

(c) The said asbestos products were sold by the defendants in a defective condition, unreasonably dangerous to the plaintiffs, and others similarly situated, as users or consumers, and that all throughout the many years of the plaintiffs' and others' similarly situated exposure to and use of the said products, the said asbestos products were expected to and did reach the users or consumers without substantial change in the condition in which they were sold;

(d) The said asbestos products were defective in that they were incapable of being made safe for their ordinary and intended use and purpose, and those uses believed safe by the general community, and said defendants failed to give adequate or sufficient warnings or instructions about the risks, dangers, and harm inherent in said asbestos products;

(e) The defendants affirmatively misrepresented to plaintiffs and other members of the public in advertising,

labels and otherwise that their asbestos products were safe in their ordinary and foreseeable use, which material misrepresentation induced plaintiffs and others to expose themselves to hazards; and

(f) The ordinary and foreseeable use of the defendants' asbestos products is an intrinsically dangerous and ultrahazardous activity; and

(g) The said asbestos products were defective because they contained asbestos; and

(h) The said asbestos products were defective because they were defectively packaged.

COUNT III - CONSPIRACY

13. Plaintiffs hereby incorporate by reference paragraphs 1 through 12 inclusive, as if each of said paragraphs were set forth fully hereunder.

14. Defendants, individually, jointly, and in conspiracy with each other and with other entities, the identities of which are presently unknown to plaintiffs, and as an industrial group and through trade associations including, but not limited to the Air Hygiene Foundation, the Industrial Hygiene Foundation of America, the Industrial Health Foundation, the Asbestos Textile Institute, the Asbestos Information Association, the National Insulation Manufacturers Association, the Thermal Insulation Manufacturers Association, the Quebec Asbestos Mining Association, and the Saranac Laboratory since at least the 1930's, and continuing to the present, have been possessed of medical and scientific data which clearly indicated that the inhalation of asbestos dust and fibers resulting from the ordinary and foreseeable use of their asbestos products was unreasonably dangerous, ultrahazardous, deleterious, carcinogenic, and potentially deadly.

15. Despite the medical and scientific data possessed by and available to them, the defendants, acting willfully, maliciously, callously, deliberately, and with wanton disregard for the rights, safety, and position of plaintiffs, and other persons similarly situated, individually, jointly, and in conspiracy with each other and with other entities, the identities of which are presently unknown to plaintiffs, which conduct and conspiracy continues to the present, fraudulently and deliberately:

(a) manufactured, sold, distributed, and caused to be used inherently dangerous asbestos products which, through their ordinary and foreseeable use, and unbeknownst to the plaintiffs, and other persons similarly situated,

would result in the serious and severe injuries which plaintiffs have suffered;

(b) exposed and continued to expose plaintiffs, and other persons similarly situated, to the risks and dangers of asbestosis, mesothelioma, scarred lungs, cancer and other illnesses all of which risks and dangers defendants or their predecessors knew, should have known or could have known;

(c) participated and continue to participate in the fraudulent scheme described above to keep the plaintiffs, and other persons similarly situated in the general community, in ignorance of their rights by fraudulently misrepresenting and concealing the nature and extent of the harm which they suffered as a result of handling, working with, using and being exposed to the defendants' asbestos products and by fraudulently misrepresenting and concealing that this harm was the direct and proximate result of the occupational handling, use and exposure to the defendants' asbestos products and the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products and, in fact, said fraudulent scheme did keep the plaintiffs, and others similarly situated, in ignorance of their rights;

(d) intended by the fraudulent misrepresentations and willful omissions set forth above and below to induce the plaintiffs, and others similarly situated in the general community, to rely upon said fraudulent misrepresentations and willful omissions, and to continue to expose themselves to the risks and dangers that the defendants knew to be inherent in the use of and exposure to their asbestos products and the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products, without warning the plaintiffs, and others similarly situated, of these risks and dangers, thereby depriving them of the opportunity of informed free choice as to whether to continue to use said asbestos products and to expose themselves to these dangers and risks;

(e) withheld or misrepresented the medical conditions of and altered other material and significant medical information on their employees, on other asbestos workers, on other workers in the construction industry, including plaintiffs, and withheld from or misrepresented to these workers and their families information about these workers' medical conditions, concerning, in particular, confirmatory evidence, appearance, suspicion or belief of asbestos-related diseases or other illnesses;

(f) reviewed, altered, distorted and/or caused to be misdiagnosed medical records and test results of their employees or other asbestos workers, for the purpose of

intentionally, fraudulently and maliciously preventing said employees or other workers and their families, including plaintiffs, from being able to discover the true state of their medical conditions, or the true state of the medical conditions of other asbestos employees, or workers, or otherwise treating same;

(g) intended and caused their employees and other asbestos workers and their families, including plaintiffs:

(i) to refrain from or lose the ability to file workmen's compensation or other disability claims for the occupational diseases suffered by them by the defendants' seeking methods to ignore or defeat their claims;

(ii) to fail to obtain proper medical care so as to cure, arrest, abate or otherwise treat their developing or existing asbestos-related diseases or other illnesses;

(iii) to increase their risk of harm and further aggravate or complicate developing or existing asbestos related diseases or other illnesses;

(iv) to deny them the right to decide or exercise their options to withdraw from unsafe and deleterious working or household conditions, exposing them to asbestos products, asbestos dust or fibers;

(v) to keep them ignorant of their medical conditions, thereby preventing them from taking any safety or precautionary measures available either through their employment or other independent means; and,

(vi) to prevent, limit or otherwise bar their right to seek recovery of compensatory and/or punitive damages against the defendants for the injuries suffered by them and caused by said defendants;

(h) manufactured, sold and distributed asbestos products in such a manner as to camouflage and make indistinguishable, and to conceal the identity, source, and manufacturer and/or distributor of said products for the purpose of misleading and keeping ignorant the users and consumers of same, thereby preventing injured plaintiffs from identifying and suing the proper defendant or defendants;

(i) entered into secret relabelling and distribution agreements, produced products without any labels or distinguishing characteristics, distributed products bearing no identification whatsoever, manufactured and distributed products identical in color, texture and/or appearance, and concealed the sale and/or transfer of corporate assets or

entities through "secret" contracts and/or agreements and/or through the continuation of predecessor trademarks, tradenames, logos, or labels in successor companies and/or successor products, so as to deceive the ultimate users, including the injured plaintiffs herein, as to the true identity, source, manufacturer and distributor of said hazardous products;

(j) used indistinguishable standardization of products and removal of trademarks, tradenames, markings, logos, labels or other identifying characteristics, in order to limit and exclude liability from claims brought by persons, including the plaintiffs, through the use and handling of said products and exposure to said asbestos products, asbestos dust and fibers and also entered into open and considered agreements for the purpose of concealing the identity and source of asbestos and asbestos products in the marketplace;

(k) caused to be released, published and disseminated data and/or reports concerning the dangers and/or safety of their asbestos products, which data and reports they knew, should have known, or could have reasonably determined to be incorrect, incomplete, outdated and misleading;

(l) failed and refused to provide the public, or workers such as plaintiffs who would foreseeably use and/or be exposed to their products and to the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products, with any warning as to the risks, dangers, and harm that the defendants knew, or should have known, or could have known to be inherent in the use of and exposure to said asbestos products and to the inhalation of asbestos dust and fibers in the ordinary and foreseeable use of said products fearing that adequate and proper warnings would adversely affect sales;

(m) deliberately chose to provide patently inadequate and ambiguous warnings and intentionally failed to warn of the known risks and dangers of their asbestos products and the inhalation of asbestos dust and fibers resulting from the ordinary and foreseeable use of said products fearing that adequate and proper warnings would adversely affect sales;

(n) refused and failed to meaningfully test their asbestos products regarding the risks and dangers to persons who use or were exposed to their asbestos products and the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products;

(o) when the aforesaid asbestos products were tested they willfully concealed and or refused to publish

adverse test results, or distorted said adverse test results so that the public and persons such as plaintiffs were misled into believing that the test results were not adverse and that their asbestos products were safe for their ordinary and foreseeable use;

(p) ignored medical and scientific data which demonstrated a causal connection between asbestos exposure and asbestosis, cancer, and mesothelioma, or other diseases, or which discussed the risk of those diseases from asbestos exposure;

(q) attempted to discredit scientists, doctors, writers, and medical literature who or which indicated, demonstrated, or established a causal connection between asbestos and asbestos related diseases;

(r) sought to create favorable publicity about the safe nature of their asbestos products for pecuniary motives when they knew of the risks and danger inherent in their asbestos products;

(s) failed to seek safe substitute products for their asbestos products because pecuniary motives of profit were followed at the expense of human lives;

(t) ignored, withheld and/or actively concealed the existence of tests, data, studies, literature and medical reports regarding the causal connection between asbestos exposure and cancer, mesothelioma, asbestosis, respiratory diseases, scarred lungs and other illnesses and diseases;

(u) chose to rely upon and cause to be disseminated reports, tests, medical and scientific data that they knew, should have known, or could have known to be inaccurate, insufficient, incomplete, outdated and misleading medical or scientific research or data regarding the causal connection between asbestos products and disease in order to avoid any possible adverse publicity that would affect the sales of asbestos products;

(v) refused to conduct, contribute to and/or to authorize testing and research involving the causal relationship of illness and disease to exposure to and the use of their asbestos products and the inhalation of the asbestos dust and fibers resulting from the ordinary and foreseeable use of said asbestos products fearing adverse test results and the publicity thereof would affect the highly profitable market of asbestos products sales, which pecuniary motives of profit were followed at the expense of human lives; and

(w) are presently relying upon invalid medical reports and data in order to defend suits such as those brought by clients of the undersigned.

16. Plaintiffs reasonably and in good faith relied upon the fraudulent misrepresentations, concealments, and willful omissions made by the defendants, individually, jointly, and in conspiracy with each other and with other entities, the identities of which are presently unknown to plaintiffs, regarding the safe nature of their asbestos products, which reliance resulted in illnesses and injuries to plaintiffs, the particulars of which will be more fully set forth in each plaintiffs' "Short-Form Complaint."

COUNT IV - BREACH OF WARRANTY

17. Plaintiffs hereby incorporate by reference paragraphs 1 through 16 inclusive, as if each of said paragraphs were set forth fully hereunder.

18. Defendants, acting individually, jointly and severally, as part of the conspiracy as alleged hereinabove and/or as a result of tacit agreement or cooperation and/or as a result of industry-wide standards or practice, impliedly warranted that the asbestos products which they mined, manufactured, produced, compounded, converted, processed, sold, supplied, merchandised, distributed, and/or otherwise placed in the stream of commerce were reasonably fit for use and safe for their intended purposes.

19. Defendants, acting individually, jointly and severally, as part of the conspiracy as alleged hereinabove and/or as a result of tacit agreement or cooperation and/or as a result of industry-wide standards or practice, breached said warranties to plaintiffs in that their said asbestos products were inherently defective, ultrahazardous, dangerous, unfit for use, not properly merchantable, and not safe for, nor reasonably fit for, their intended ordinary and foreseeable use and purpose.

COUNT V - ADMIRALTY (IN SHIPYARD CASES ONLY)

20. Plaintiffs hereby incorporate by reference paragraphs 1 through 19 inclusive as if each of said paragraphs were set forth fully hereunder.

21. Plaintiffs further allege that there is jurisdiction of this cause of action pursuant to U.S.C.A. 1333(1), 46 U.S.C.A. 740, et seq., and the general admiralty and maritime law of the United States.

22. Plaintiffs aver that their employment was necessary to the seaworthiness of maritime vessels upon which they worked and that during the years of their employment heretofore stated, a majority of their work was upon seagoing vessels or vessels being constructed for use at sea.

23. Plaintiffs further aver that during the years of their employment, plaintiffs worked on or near naval vessels of the United States Navy or its allies, upon United States Merchant Marine vessels, merchant vessels and passenger vessels, both in dry dock and on the navigable waters of the United States, performing the traditional maritime activities of shipbuilding and ship repair.

24. In the performance of such traditional maritime activities plaintiffs were continually required either to install, remove and/or perform their duties in the proximity of co-employees engaged in the installation, removal and repair and/or replacement of the defendants' asbestos products which products were or became appurtenances of the aforesaid ships and plaintiffs continually worked with, used and/or were caused to come into contact with and be exposed to the defendants' asbestos products, asbestos dust and fibers resulting from the ordinary and foreseeable use of said maritime asbestos products as has been more particularly described herein.

25. Plaintiffs were injured as has previously been described in the course of the aforementioned traditional maritime activities and such injuries were proximately caused by the ordinary and foreseeable use of the said maritime asbestos products which were or became appurtenances of the said vessels on which plaintiffs worked.

COUNT VI - NEIGHBORHOOD AND HOUSEHOLD EXPOSURE

26. Plaintiffs hereby incorporate by reference paragraphs 1 through 25 inclusive as if each of said paragraphs were set forth fully hereunder.

27. Plaintiffs' relatives with whom they lived at various times during their lives were employed by certain of the defendants and/or used asbestos products manufactured by the defendants.

28. As a result of living with the relatives as aforesaid, plaintiffs were caused to come into contact with and inhale asbestos particles, dust, and fibers carried on the persons and/or clothing of their aforesaid relatives and/or brought into their residence by the aforesaid relatives.

29. Further, the defendants allowed asbestos particles, dust, and fibers to be emitted into the air in the neighborhood of plaintiffs' residence from its plants and dump sites located near the plaintiffs' residence, which asbestos particles, dust and fibers were inhaled by plaintiffs.

30. At all times relevant hereto, defendants knew or should have known of the health hazards caused by the afore-stated asbestos fibers, dust, particles, and/or pollution being emitted into the air outside the plant and should have known that said dust, fibers, particles, and/or pollution were deleterious, poisonous, and highly harmful to plaintiffs' bodies, lungs, and respiratory system and to the bodies, lungs, and respiratory systems of other people living near the defendants' facility, yet defendants failed to provide adequate and sufficient warnings.

COUNT VII - EMPLOYER DEFENDANTS' TORTIOUS CONDUCT

31. Plaintiffs hereby incorporate by reference paragraphs 1 through 30 inclusive as if each of said paragraphs were set forth fully hereunder.

32. Certain of the defendants (referred to here as "defendant employers") employed plaintiffs. Defendant employers at all times relevant hereto were negligent, reckless, careless and performed intentional torts, which acts or omissions to act caused injuries to plaintiffs, in the following conduct:

(a) failing to advise plaintiffs of the presence of asbestos and of the dangerous characteristics of the asbestos and asbestos related products which they were working with in connection with their employment;

(b) failing to provide plaintiffs with appropriate protective equipment and appliances necessary in order to protect them from being becoming injured or disabled by way of exposure to asbestos and asbestos related products;

(c) failing to provide plaintiffs with a safe place to work;

(d) failing to provide proper instruction and supervision to plaintiffs in the performance of their duties in handling asbestos or asbestos products;

(e) failing to provide plaintiffs with necessary and proper safety equipment to use while performing their work duties in and around asbestos and asbestos products;

(f) failing to take adequate precautions to prevent plaintiffs from suffering injuries as a result of their employment;

(g) being otherwise negligent, reckless and careless in failing to protect the health, safety and welfare of their employees;

(h) failing to advise plaintiffs of the results of their x-rays, examinations and pulmonary function tests which were taken by or on behalf of defendant employer during the course of their employment and/or failing to advise plaintiffs to cease further asbestos exposure; and

(i) failing to advise plaintiffs after plaintiffs' exposure to asbestos ceased, about the dangers of exposure to asbestos, about the dangers of past or present asbestos exposure in combination with smoking or exposure to other fumes and dust, and about the need for future medical surveillance.

33. At all times relevant hereto, defendant employers intentionally, fraudulently, deliberately and systematically misrepresented and/or intentionally, fraudulently, deliberately and systematically failed to represent their knowledge of the presence of asbestos and the health hazards associated with asbestos exposure to the employed plaintiffs, all with the intent to deceive and injure plaintiffs.

34. At all times relevant hereto, defendant employers acted maliciously, deceitfully, recklessly, intentionally, willfully, negligently, and/or deliberately and in a conspiratorial manner with other persons or entities in order to withhold from plaintiffs their knowledge of the condition of plaintiffs' health as it is related to asbestos exposure and their knowledge of health hazards in general related to asbestos exposure.

35. At all times relevant hereto, defendant employers had in their possession and control, or had available to them, medical information including but not limited to medical reports, x-ray findings and pulmonary function testing results which indicated that plaintiffs had suffered damage to their body, lungs, and/or internal organs as a result of plaintiff's exposure to asbestos at their workplace and defendant employers callously, maliciously, intentionally, recklessly, willfully, negligently, and/or deliberately withheld from plaintiffs for many years their aforesaid medical reports, x-ray findings and pulmonary function testing results, failed to adequately advise plaintiffs of the information that they had available to them and/or continued to allow plaintiffs to work in an asbestos environment without changing their job locations which was detrimental to plaintiffs' health and which caused

plaintiffs to develop diseases and/or aggravated the initial work related injury that plaintiffs suffered. Furthermore, defendant employers authorized their medical staffs to participate in the fraud and deceit of plaintiffs with the intent to injure the plaintiffs by authorizing their medical staffs to withhold medical information, medical reports, x-ray results, pulmonary function testing results, and physical examination results from the plaintiffs at all times referred to herein.

36. Plaintiffs bring this claim against the defendant employers based on common law principles of negligence and have been advised and therefore allege that their claims are not precluded by the applicable Workmen's Compensation and/or Occupational Disease Acts of Pennsylvania, Delaware, New Jersey or of any other state or territory of the United States, by reason of the fact that:

(a) injury or personal injury to plaintiffs, resulting in disability and/or death, did not occur within the statutory time provisions of the date of the last employment in an occupation or industry in which they were exposed to hazards which could result in asbestos related diseases;

(b) the defendant employers committed intentional acts and/or conduct as described above; and

(c) the defendant employers engaged in activities, such as supplying and/or installing asbestos products, which were not the ordinary activities for which plaintiffs were employed and plaintiffs therefore rely upon the "dual capacity" exception to the Workers' Compensation bar against third party suits.

COUNT VIII - RAILROAD DEFENDANTS

37. Plaintiffs hereby incorporate by reference paragraphs 1 through 36 inclusive, as if each paragraph were fully set forth hereunder.

38. Certain of the defendants (referred to herein as "railroad defendants") employed plaintiffs. While employed by the railroad defendants, the plaintiffs acting within the scope of such employment were engaged in the furtherance of interstate commerce within the meaning of F.E.L.A.

39. All the property, equipment and operations involved in the harm to plaintiffs described herein were owned and/or under the direct and exclusive control of the defendant railroads, their agents, servants and/or employees.

40. The injuries and disability of plaintiffs while working as employees of the railroad defendants were caused

by plaintiffs' exposure to toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists or gases, including asbestos.

41. The injuries and disability of plaintiffs were caused in whole or in part by the negligence, carelessness and/or recklessness of the railroad defendants, generally and more specifically as follows:

(a) in failing to exercise reasonable care to adequately warn plaintiffs of the risks, dangers and harm to which they were exposed in working with, touching or inhaling toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists or gases, including asbestos;

(b) in failing to provide the plaintiffs with reasonably safe and sufficient personal safety apparel and equipment including but not limited to respirators as was necessary to protect them from being injured, poisoned, disabled, killed or otherwise harmed, by working with, using, handling and/or coming in contact with and being exposed to toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos;

(c) in failing to provide plaintiffs with a reasonably safe place in which to work;

(d) in failing and omitting to minimize or eliminate plaintiffs' exposure to substances containing toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos by providing ventilating and exhaust fans, dampening or wetting procedures and other recommended and available procedures;

(e) in failing and omitting to conduct any test to determine the presence and/or amount of toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos, in and around plaintiffs' workplace;

(f) in failing to transfer plaintiffs from workplaces where they had been exposed to toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists or gases, including asbestos, to other employment with no such or lesser exposure;

(g) in failing to conduct physical examinations of plaintiffs of such quality as to detect any effects of toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos, so that their employees, such as plaintiffs, could be advised as to the danger and take appropriate safety measures;

(h) in violating the provisions of the Boiler Inspection Act, 45 U.S.C. 22-34;

(i) in failing to substitute non-toxic and non-pathogenic material for hazardous material;

(j) in failing to issue and enforce appropriate safety rules limiting or eliminating exposure to toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos; and

(k) in failing to obey appropriate and relevant federal and state regulations and industrial hygiene recommendations intended to protect plaintiffs from exposure to toxic and/or pathogenic liquids, solids, dusts, fumes, vapors, mists, or gases, including asbestos.

COUNT IX - WRONGFUL DEATH

42. Plaintiff hereby incorporates by reference paragraphs 1 through 41 inclusive, as if each of said paragraphs were set forth fully hereunder.

43. As the direct and proximate result of the aforesaid some of the plaintiffs or people who were exposed to the defendants' asbestos products (hereafter referred to as "decedents"), were caused to contract the diseases and injuries described herein, causing extreme pain, suffering and mental anguish and died as a direct and proximate result of defendants' gross negligence, carelessness, breach of warranty, strict liability, conspiracy, misrepresentation and willful conduct, as alleged herein.

COUNT X - DAMAGES

44. Plaintiffs hereby incorporate by reference paragraphs 1 through 43 inclusive, as if each of said paragraphs were set forth fully hereunder.

45. As a direct and proximate result of the negligence, carelessness, gross negligence, willful misconduct, breach of warranty, strict liability, fraudulent concealment, conspiracy, misrepresentation, willful omissions, recklessness and outrageous conduct of the defendants as described in Counts I-VII supra, plaintiffs were caused to contract diseases and injuries to plaintiffs' respiratory system, heart and other parts of the body, the full extent of which has not yet been determined, including pleural thickening, pleural plaques, asbestos-related pleural disease, asbestosis, scarred lungs, cancer of the lungs and other parts of the body, mesothelioma, and/or the risks of these same diseases, some or all of which are permanent and/or fatal, as set forth in each plaintiff's "short-form" complaint to be filed, and may suffer in the future from

other diseases which have not yet been diagnosed, causing plaintiffs pain, suffering and mental anguish.

46. As a direct and proximate result of the aforesaid, plaintiffs were obliged to spend various sums of money to treat their diseases and injuries and plaintiffs continue to be obliged for the expenses of same; as a direct and proximate result of the aforesaid, plaintiffs have sustained a loss of earnings and earning capacity; and as a direct and proximate result of the aforesaid, plaintiffs' enjoyment of life has been impaired and plaintiffs' life expectancies shortened, all to plaintiffs' great loss.

47. As a direct and proximate result of the aforesaid, plaintiffs have undergone great physical pain, mental anguish, and shock to their nervous system.

48. As a direct and approximate result of the aforesaid, and since plaintiffs first learned of their injuries, plaintiffs have developed severe anxiety, hysteria or phobias, any or all of which have developed into a reasonable and traumatic fear of an increased risk of additional asbestos caused and/or related disease, including, but not limited to, cancer, resulting from exposure, directly and indirectly, to the asbestos products of the defendants.

49. As a direct and proximate result of the aforesaid, plaintiffs have and will continue to suffer permanent and ongoing psychological damage which may require future psychological and/or medical treatment.

50. As a direct and proximate result of the aforesaid, plaintiffs have and will continue to suffer a disintegration and deterioration of the family unit and the relationships existing therein, resulting in enhanced anguish, depression and other symptoms of psychological stress and disorder.

51. As a direct and proximate cause of the aforesaid, plaintiff-spouses have suffered the loss of the plaintiff-workers' society, services and companionship and a deterioration of the marital relationship, and may continue to be so deprived, and, accordingly, plaintiff-spouses claim damages for loss of consortium.

52. As a direct and proximate result of the aforesaid, decedents incurred hospital, nursing and medical expenses. Decedents' beneficiaries have incurred hospital, nursing, medical, funeral and estate administration expenses as a result of decedents' death. Plaintiffs as Executors/Executrices of the Estates of decedents bring this claim on behalf of decedents' lawful beneficiaries for these damages and for all pecuniary losses sustained by said beneficiaries pursuant to 42 Pa. C.S.A. § 8301 and 2A N.J.S.A. § 13-1.

53. As a direct and proximate result of the aforesaid, decedents, prior to their deaths, were obliged to spend various sums of money to treat their injuries, which debts have been assumed by their estates; as a direct and proximate result of the aforesaid, decedents were caused pain, suffering, mental anguish and impairment of the enjoyment of life, until the date of their deaths; and, as a direct and proximate result of the aforesaid, decedents suffered a loss of earnings and earning capacity. Plaintiffs, as Executors/Executrices of decedents' estates bring this claim on behalf of the estates for damages under 42 Pa. C.S.A. _8302 and 2A N.J.S.A. _15-13.

54. As a direct and proximate result of the aforesaid, decedents and their spouses, until the time of decedents' deaths, suffered a disintegration and deterioration of the family unit and the relationships existing therein, resulting in enhanced anguish, depression and other symptoms of psychological stress and disorder. This claim is brought on behalf of the estates of decedents, pursuant to 42 Pa. C.S.A. 8302, and 2A N.J.S.A. _15-13 and on behalf of plaintiff-spouses in their own right.

55. As a direct and proximate result of the aforesaid, and since first learning of decedents' and/or living plaintiff-workers' injuries, all other plaintiffs have developed severe anxiety, hysteria or phobias, any and all of which has developed into a reasonable and traumatic fear of an increased risk of asbestos-caused and/or related disease, including, but not limited to, cancer to plaintiffs, resulting from exposure, directly and indirectly, to the asbestos products of defendants, to decedents' and plaintiff-workers' work clothes and tools.

56. As a direct and proximate result of the aforesaid, and including the observance of the suffering of their spouses, decedents, until the date of their deaths, suffered permanent and ongoing psychological damage; as a direct and proximate result of the aforesaid, and including the observance of the suffering and physical deterioration of their spouses, until the date of their death, plaintiffs have and will continue to suffer permanent and ongoing psychological damage which may require future psychological and/or medical treatment. Plaintiffs as Executors/Executrices or Administrators/Administratrices of decedents' estates bring the claim on behalf of the estate for damages under 42 Pa. C.S.A. _8302, and in their own right.

WHEREFORE, Plaintiffs pray for judgment against the defendants and each of them individually, jointly and severally on each of the above Counts, for compensatory damages in an amount in excess of TWENTY THOUSAND DOLLARS (\$20,000.00) and (except on Count IV) punitive damages in a sum in excess of TWENTY THOUSAND DOLLARS (\$20,000.00) plus costs of suit, and such other and further relief as is just and proper.