

CLAIMS RESOLUTION MANAGEMENT CORPORATION

ASBESTOS CLAIMS RESEARCH FACILITY

Claims Resolution Management Corporation (“CRMC”) maintains an Asbestos Claims Research Facility (“Research Facility”) in Aurora, Colorado. The facility is available for use by beneficiaries of the Manville Personal Injury Settlement Trust (“Manville Trust”) and others who are interested in asbestos claims, litigation and history. The Research Facility contains a collection of more than 32,000 boxes, 7,200 rolls of microfilm, and 5,000 subject-related and witness files turned over to the facility by the Johns-Manville Corporation (“Manville”). Since 1989, counsel for Plaintiff and Co-Defendant Beneficiaries have found the collection a valuable source of asbestos industry documents. With the help of indices, data bases, and more than two decades of experience, CRMC provides documents related to key issues in asbestos litigation, including fiber sales, product identification and specifications, and industry knowledge of risk.

- I. To schedule a records review or request research assistance, contact Research Coordinator Maggie Baumgardner at:

Gateway Plaza
3390 Peoria Street, Unit 304
Aurora, CO 80010
(303) 364-8158
FAX: (303) 364-9603

Inquiries also may be sent to Maggie via e-mail at: mjbaumgardner@qwestoffice.net.

The Research Facility is located on the northeast side of the Denver metropolitan area.

(1) From downtown Denver: Go east on 17th Avenue to Colorado Boulevard. Go north on Colorado Boulevard to Interstate 70. Go east on Interstate 70 to Peoria Street, exit #281. Go south on Peoria across the railroad tracks. Turn east (left) into Gateway Plaza. Building 3390 is the second building on the right. Go straight to Suite 304.

(2) From Denver International Airport: Go west on Interstate 70. Exit south on Peoria Street, exit #281. Go south on Peoria across the railroad tracks. Turn east (left) into Gateway Plaza. Building 3390 is the second building on the right. Go straight to Suite 304.

II. STANDARD RESEARCH and REVIEW HOURS

Monday through Thursday: 9:00 a.m. to 6:00 p.m.
Friday: 9:00 a.m. to 5:00 p.m.

Maggie is the only full-time CRMC employee at the Research Facility. We recommend that you call in advance to confirm her schedule and access to the Research Facility.

III. RESEARCH COSTS

Costs associated with review of documents in the Research Facility are indicated below. You may have the CRMC perform the research for you or visit the Research Facility yourself. When vendor expenses are expected to exceed \$5,000, a deposit to cover those expenses is required. Payment of the total amount invoiced must be made prior to release of any records requested.

Research Coordinator's time	\$150.00 per hour; minimum \$75.00
Research Assistants' time	
Monitoring reviewers	\$35.00 per hour
All other assistance	\$65.00 per hour
Box Retrieval costs	
Notice of at least 48 hours	\$8.50 per box
Delivery Charge	\$65.00 per trip / \$130.00 roundtrip
Rush – same day	\$15.00 per box
Rush – delivery charge	\$100.00 per trip / \$200.00 roundtrip
Orders of less than 3 boxes	Additional \$8.00 per order
Large box costs	\$17.00 per box with notice, \$30.00 Rush
Photocopying	\$0.24, oversize and color copies will be billed based on vendor charges
Scanned documents	\$0.30 per page, plus microfilm or copy charges as they apply.
Bates Labeling, for paper copies	\$0.07 per label
Branding, for scanned documents	\$0.02 per brand
Microfilm page duplication	\$0.40 per page plus assistant's time
Microfilm reel	Copy cost based upon vendor charge
Audio/Visual materials	Copy cost based upon vendor charge
Photographs	Copy cost based upon vendor charge
Fee for On-Site Research Facility Visits	\$25.00 per day

The costs listed above, which are applicable to research done on behalf of beneficiaries of the Manville Trust, are subject to change. When research is done on behalf of non-beneficiaries, some of the rates will be higher. All ACRF customers should confirm current rates before authorizing or beginning research at the facility. Depending on circumstances, there may be additional charges for

work, such as overtime required to meet client needs, or for requests to pull more than 300 boxes for a review. If a reviewer requests to view films, audio tapes or videos found among the collections, CRMC will assist with procuring the necessary audio-visual equipment and the reviewer will be responsible for paying the cost of renting any such equipment.

IV. SHIPPING COSTS

Shipping will be via Federal Express. Reviewers must provide their Federal Express account number for shipment. If reviewers do not have a Federal Express account, please advise the Research Coordinator of the need to discuss other shipping arrangements.

V. AUTHORIZATION FOR RESEARCH

Researchers and their counsel, if any, must execute a Research Facility user agreement prior to commencing research. Most documents housed at the Research Facility are accessible for review. However, Manville reserves the right to conduct a privilege and trade secret review of documents reviewers designate for copying.

VI. ADMISSION AND REVIEW RULES AND PROCEDURES

Reviewers who wish to visit the Research Facility must make advance reservations.

Smoking is not allowed on the premises.

Brief cases, folders, notebooks, tablets, purses, or other items in which documents could be concealed are subject to inspection upon departure from the review area.

It is important that documents remain near the box or file from which they were removed. Please make an effort to handle the documents carefully, and to replace them in file folders and boxes in the order in which they were found. Indices to the collections become useless if documents are shuffled. A Production Assistant will be present to insure that the documents are maintained in good order.

VII. AMENITIES

Coffee and bottled water are available at the Research Facility. Reviewers may bring in their own beverages and snacks. In order to prevent possible damage to the documents, reviewers are asked to keep beverages away from documents in the review area.

One telephone line is available for use by reviewers and Research Facility personnel. Since there is only one telephone line available for all calls, we request that you limit the duration and number of calls made. Cell phones are recommended.

A facsimile machine is available on the premises for limited use. The facsimile number is (303) 364-9603.

VIII. ATTIRE

It is recommended that casual, easily laundered clothing be worn (e.g., jeans) as the Research Facility is in a warehouse setting. In addition, because many of the documents are very old and have been in storage for a number of years, reviewers may wish to bring gloves.

IX. NATURE AND SIZE OF THE COLLECTION

A. Box collection

There are various levels of indexing for the more than 32,000 boxes and 7,200 rolls of microfilm at the Research Facility. Some indices are more detailed than others. Most index entries identify the general box contents, not the individual documents. Therefore, CRMC cannot guarantee that every box and/or its contents have been indexed. Thus a search of available indices will not necessarily identify all boxes and/or documents responsive to a reviewer's requests. Excerpts from the box index will be provided upon request. The box index is maintained in Microsoft Access.

Many of the more than 7,200 rolls of microfilm at the Research Facility are indexed by document and searchable in the INQUIRE system, described in Section C below. Indexed documents include those designated by the Department of Justice during Manville's litigation with the government (1986-87).

Categories of film that are not indexed include:

industrial hygiene records	Asbestos magazine
depositions	patents
brief banks for litigation	"Vorwald" (part of Saranac Lake collection)
medical articles	Research & Development department documents

1. The box index contains the following fields:

a. Beginning Date and Ending Date: The beginning and ending date fields represent the range of dates of documents found in the box. Some boxes do not have date information available. Many of the boxes were indexed using a five year date range. For example, if the range is 1961 to 1965, the beginning date on the index will be 1961, even though the earliest document may be dated 1964. A date of 1901 as the beginning date indicates that no beginning date has been identified.

b. Document Types: Document types are used to describe the documents in the box. All document types which apply are indicated on the index. Some document types have been added based on the description given for the contents of the box, without a review of the actual contents of the box. The document types are listed in the order in which they appear in the index. Document types include:

Correspondence [includes letters, internal memos and research reports]

Publications, Printouts, Blueprints

Forms [a catch-all category for documents, this often included time cards, quality control forms, etc.]

Invoices [includes invoices, shipping tickets, and ledgers]

Pleadings, Transcripts

AV Material [includes photos, pictures, films, slides, transparencies, negatives]

Blowbacks [paper copies printed from microfilm]

Specifications, Other [includes computer punch cards]

c. Subject Area: Subject area describes the general topic of the documents in the boxes. Some subject areas were added based on the description given for the contents of the box, without a review of the contents of the box. The subject types are listed in the order in which they appear in the index. The categories are described below:

Company Organization: includes organizational materials, such as charts, minutes of directors' or annual meetings, quarterly or annual reports or SEC filings, shareholder information, or investor relations materials.

Company Bulletins: includes company materials such as President's Bulletins, policy statements, and company publications.

Asbestos Mining: includes documents relating to the exploration or evaluation of asbestos deposits, mining or milling or asbestos fiber.

Product Development: includes research and development reports, product proposals, pilot projects, patent or trademark materials, product design or modification, or substitutes for asbestos.

Manufacturing: includes production records, inventories of raw materials or finished products, scheduling orders, wastage reports, quality control records, blend or formula information, time management studies, production and job methods materials, batch records, deviation reports, packaging of products and inventories of equipment.

Standards: includes internal manufacturing or finished product specifications, government specifications, specifications promulgated by purchasers, building code requirements, and ASTM or similar standards.

Engineering: includes plant layouts, equipment designs or modification plans, equipment maintenance records, dust control or ventilation equipment records, requests for proposals, appropriations and process design records.

Safety: includes reports relating to the health aspects of exposure to potentially toxic substances including asbestos, industrial hygiene surveys or reports, dust counts, discussions of TLVs or similar standards, housekeeping, safe work practices, reports from governmental or quasi-governmental bodies (i.e., OSHA, EPA, USPHS, ACGIH), medical or industrial hygiene articles and bibliographies, hazardous waste information, safety records, medical surveys, internal medical programs, and product warnings.

Personnel: includes minutes of labor-management, industrial relations, or employee relations meetings, grievances or complaints, grievance procedures, job requirements or qualification, job descriptions, benefits and retirement information, employee training materials and manuals, salary or pay structures, and employee organizations (i.e., Quarter Century Club).

Payroll: includes individual employee time records, expense reports and tax exempt forms.

Purchasing: includes records of raw materials purchases, supplies, and equipment, external advertising and marketing literature, purchase invoices, receiving reports, orders, or contracts to purchase; usually we did not include asbestos fiber purchases in this category; there are 6,582 boxes in this category.

Sales: includes invoices, shipping documents, credit memoranda, customer complaints, orders, customer product inquiries, bids, and custom invoices; there are 12,784 boxes which have this category marked.

Marketing: includes sales literature, catalogues, brochures, advertisements, advertising campaigns and agency information, sales projections, marketing studies, and sales meetings.

Asbestos Purchase/Use: includes records showing purchase of fiber or receipt of fiber, orders on the mill, fiber usage reports, uses of fiber in manufacturing, sales of fiber to other manufacturers, and purchases from the Government Services Administration (GSA) stockpile; usually if asbestos fiber was mentioned, this category was marked.

Trade Organizations: includes minutes, records, publications, or reports relating to trade organizations.

Financial: includes ledgers, journals, budgets, accounting records, allocations of expenses, accounts payable, accounts receivable, check and check registers, and requests for checks.

Claims: includes documents related to litigation, workers' compensation claims, employee claims, EPA, OSHA, or similar citations or complaints, other regulatory actions, and insurance coverage or litigation.

Medical/Personnel Records: includes documents from an individual employee's medical or personnel file.

Customer Information: used in the Canadian collection only. Identifies documents which are not sales invoices but contain customer information.

Contract Unit: used in the Canadian collection only. Identifies documents which relate to the Contract Units in Canada.

Fiber Sales: includes records showing asbestos fiber sales.

d. **Comments:** a field created to describe the contents of the boxes. This field will have the most information currently available regarding the box. However, for the majority of the boxes, this field is blank.

2. The boxes come from the following locations and divisions:

a. **PLANTS:**

Alexandria, IN	Asbestos, PQ (mine and plant)
Billerica, MA	Denison, TX
Green Cove Springs, FL	Laurinburg, NC
Lompoc, CA (mine and plant)	Long Beach, CA
Los Angeles, CA	Manville, NJ
Marrero, LA	Marshville, NC
Nashua, NH	North Bay, ON
Pittsburg, CA	Savannah, GA
Stockton, CA	Toronto, ON
Waukegan, IL	Zelienople, PA

b. **CONTRACT UNITS:**

Albany, NY	Canada
Cincinnati, OH	Columbus, OH
Dallas, TX	Denver, CO
Detroit, MI	Houston, TX
Huntsville, AL	Indianapolis, IN
Jacksonville, FL	Kansas City, MO
Knoxville, TN	Pittsburgh, PA
San Antonio, TX	St. Louis, MO

c. SALES OFFICES:

Englewood Cliffs, NJ	Montreal, PQ
Oak Brook, IL	Pleasanton, CA
San Mateo, CA	Waterville, OH

d. DIVISION:

Asbestos Fiber	Canadian Products
Executive	International
Health, Safety & Environment	Legal Department
Patent & Licensing	Tax Department
Research & Development	Workers' Compensation.

B. Denver Resource Center ("DRC") Working Files

These files were created by Manville and were further developed by counsel for the Manville Trust. They were gathered in asbestos litigation. The documents were collected from various sources, including the boxes identified above, from discovery in asbestos litigation, from Manville's litigation with the U.S. government with insurers, and from co-defendants. They include "everything you wanted to know about asbestos." They are broken up into three general categories:

Subject files	2,197 files
Witness files	3,312 files
Product/Specification files	526 files

Subject files are topical in nature and include information gathered on a company, association, plant, topic, etc. Witness files are generally depositions or interview summaries of former employees of Manville or other players in asbestos litigation. Product files include product brochures and manufacturing specifications. These files were not created to be all-inclusive. An index of these files can be provided upon request.

There is a medical article collection containing 5,492 articles relating to asbestos health issues. Articles are dated from 1899 through 1992. The articles are indexed in a Microsoft Access database.

C. INQUIRE Document Databases

The INQUIRE system was begun by Manville's legal department for litigation support in the early 1980s. It is composed of three separate databases:

The AHDOC database (ALDATA) was begun to assist in the asbestos litigation. It contains 23,934 documents and is the "oldest" database available to CRMC. No documents have been added since August 1983. These documents were gathered during asbestos litigation. They include the Sumner Simpson documents, Manville General Headquarters documents dating from the 1930s and 1940s, documents used as exhibits in the litigation, and documents used in responding to interrogatories before Manville sought Chapter 11 protection.

The GOVDOC database (GVDATA), begun in August 1983 for the government litigation, is composed of 91,168 documents gathered from U.S. government record centers and from Manville's records. No documents have been added since April 28, 1987.

The INSDOC database (INDATA) includes 279,480 documents gathered from Manville's litigation with its insurers. No documents have been added since October 7, 1986. Many of the documents from the INSDOC database, including all documents produced by other parties, are protected by an order issued on March 30, 1983 by Judge Ira Brown of the Superior Court of the State of California, City and County of San Francisco, in JMC v. Home Insurance. If you wish to obtain the documents protected by the court order you will need to petition the court to grant you permission to review and utilize the protected documents.

These databases were converted to FOLIO VIEWS in the early 1990's. The data was converted into "flat files," losing the field structure. The data in each field was retained, but cannot be searched as a field. For example, you cannot locate all documents authored by Smith. A search of Smith will bring up all occurrences whether he appears as an author, addressee, recipient of a copy, or is mentioned in the title. States were abbreviated with standard two-digit abbreviations except for Colorado, coded as "COLO"; Indiana, coded as "IND" and Oregon, coded as "OG".

Searches will be downloaded from the database to e-mail or to disk in WORD format, or will be printed, depending on the size of the search. There is no sorting capability on the system, and searches cannot be organized by microfilm number or date. All documents identified in the databases are found among the microfilm maintained at the Research Facility.