

CRMC
Asbestos Claims Research Facility
Information Packet

Rates Effective Date: July 1, 2020

The Asbestos Claims Research Facility (“ACRF”) in Aurora, Colorado is operated by the Claims Resolution Management Corporation (“CRMC”) to make available for research a large collection of historic Johns Manville Corporation (“JM”) documents relating to asbestos. The facility is available to beneficiaries of the Manville Personal Injury Settlement Trust (“Manville Trust”) and others who are interested in asbestos claims, litigation, and history. The ACRF maintains a collection of more than 31,000 boxes, 7,200 rolls of microfilm, and 5,000 subject-related and witness files. Since 1988, 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 three decades of experience, the ACRF provides documents related to key issues in asbestos litigation, including fiber sales, product identification and specifications, and industry knowledge of risk. This information packet can also be found online at the web address: www.claimsres.com/wp-content/uploads/2016/11/ACRFPacket.pdf

RESEARCH AND REVIEWS

To schedule a records review or request research assistance, contact the ACRF by email at ACRFRecords@claimsres.com or by phone. Below is the current contact information for the ACRF.

CRMC ACRF
Gateway Plaza
3390 Peoria Street, Unit 304
Aurora, CO 80010
TEL: (303) 364-8158

Monday through Friday: 9:00 a.m. to 5:00 p.m. (Mountain Standard Time)

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

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. Go south on Peoria over the “bridge”. Turn left on 33rd Avenue. Follow round-a-bout to Quentin. Turn left onto Quentin (one way street). Turn into the second entrance on the left. Building 3390 is the first building on the left. Suite 304 is in the middle on the left.

From Denver International Airport: Go east on Interstate 70 to Peoria Street. Go south on Peoria over the “bridge”. Turn left on 33rd Avenue. Follow round-a-bout to Quentin. Turn left onto Quentin (one way street). Turn into the second entrance on the left. Building 3390 is the first building on the left. Suite 304 is in the middle on the left.

AUTHORIZATION FOR RESEARCH

Researchers must execute and submit to the ACRF a Research Services and Visitor Agreement and Release before any research or visits begin. That form is attached at the end of this packet.

ON-SITE RESEARCH PROCEDURES

Reviewers who wish to visit the ACRF must make reservations. The ACRF can only accommodate one review group at a time. It can accommodate groups of ten people or fewer comfortably.

When scheduling a reservation, ACRF requires at least 48 hours (business days) to order boxes for review. This allows boxes to be delivered from Iron Mountain storage prior to the scheduled reservation. Boxes can be ordered while a review is occurring if they are ordered in a timely manner. Boxes ordered for same day delivery will have RUSH charges applied.

For all on-site reviews, the Project Coordinator's and/or a Research Assistant's time will be billed at \$115 per hour for monitoring, or they may assist you in the review for \$151 per hour.

Reviewers will be asked to leave the review area between 1:00 p.m. to 2:00 p.m. for lunch hour.

It is recommended that casual, easily laundered clothing be worn (e.g. jeans) as the boxes and documents are old and have been in storage for a number of years.

It is important that documents remain near the box or file from which they were removed. Please handle the documents carefully, and 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 or misplaced.

AMENITIES

Coffee is available at the 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. Wi-Fi is available on-site.

NATURE AND SIZE OF THE COLLECTIONS

The collections are broken into three main sources:

1. On-Site ACRF Working Files;
2. Microfilm and INQUIRE document databases; and
3. Box collections.

The ACRF collections do not represent all JM asbestos records that ever existed. Be aware that because there are so many sources of documents in the collection, a request for "all and everything" regarding a particular topic may include thousands of boxes and files. The indices for all collections continue to be updated as the ACRF staff has time.

1. On-Site ACRF Working Files

These files were created by JM and later added to by counsel for the Manville Trust. They were gathered from various sources, including the box collections described below, from discovery in asbestos litigation, and from JM's litigation with the U.S. government, insurers, and co-defendants. They include "everything you want to know about asbestos." They are divided into three general groups:

| | |
|-----------------------------|-------------|
| 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 JM employees or other players in asbestos litigation. Product files include product brochures and manufacturing specifications. The files are kept on-site in three-inch expandable folders. These files were not created to be all-inclusive. An index of these files may be provided upon request.

The on-site files include year-end sales summaries for Asbestos Fiber (1950 to 1983), year-end sales summaries for mostly Pipe (1972 to 1982), and a customer listing for 1981. The customer listing identifies only companies that were customers in 1981. It does not reflect all customers for all years.

A medical article collection contains 5,492 articles relating to asbestos health issues dating from 1899 through 1992.

2. Microfilm and INQUIRE Document Databases

ACRF's collection includes 7,252 microfilm reels. Of these, 2,691 reels are indexed by document and searchable in the INQUIRE system described below. The INQUIRE databases were begun by JM's legal department for litigation support in the early 1980s. These databases were *not created to track sales information*.

The INQUIRE system is composed of three separate databases:

- The AHDOC database was created to assist with asbestos litigation prior to JM's 1982 bankruptcy filing. It contains 23,934 documents. These include the Sumner Simpson documents, JM General Headquarters documents dating from the 1930s and 1940s, documents used as exhibits in the litigation, and documents used in responding to discovery.
- The GOVDOC database, is composed of 91,168 documents gathered for the *JM v. USA* case. The records have been gathered from JM's records, U.S. government record centers and departments, including Bureau of Mines, Navy Bureau of Ships, Maritime Administration, Naval Shipyards, Secretary of the Navy, and the WWII War Production Board. Anecdotally, we have been told ACRF has the best collection of government knowledge and shipyard documents from WWII through the early 1980s gathered in one place.

- The INSDOC database is composed of 279,480 documents gathered from JM’s litigation with its insurers. This database includes documents from the AH database, documents produced by JM relating to insurance coverage issues, health & safety knowledge documents, and association documents. Many of the documents from the INSDOC database, including all documents produced by parties other than JM, 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 in California to grant you permission to review and utilize the protected documents.

Searches will be downloaded from the database in WORD format. Because the databases were once in a folio views DOS format, extra boxes and lines may appear in the searches. Searches done since 2017 will have the fields separated in table format. All documents identified in the databases are found among the microfilm maintained at the ACRF.

In addition to microfilm documents found on the INQUIRE database, there are several categories of microfilm not indexed. These include: *Asbestos* magazine, Brief banks for litigation, JM Company Policy Bulletins (1929 to 1970), JM Plant Industrial Hygiene Records (through 1978), Patents & Licensing, Research & Development Department documents, “Vorwald” (part of Saranac Lake collection), Health, Safety & Environment Department documents, and 647 reels representing all documents produced by JM to the Justice Department for the *J-M v. USA* case.

3. Box Collections

The level of indexing of the boxes varies, with some having significantly more detail than others. The indices are updated on an on-going basis. In all cases, the index identifies only the general contents of a box, not individual documents. Therefore, a search of available indices *may not* identify all boxes and/or documents responsive to a reviewer's requests. Excerpts from the box index will be provided upon request, as well as indices to the files.

Most of the 31,000 boxes are stored off-site with Iron Mountain. The most frequently used boxes are kept on-site. *Please be aware that a small number of boxes in the collection have been found to contain samples of JM products, some of which are likely to contain asbestos.*

Box Reviews -- Sales Records

The collection includes 12,643 boxes of sales records. JM sold its products through various product divisions. The sales boxes may be from one division only or, like the tax invoices, may include records from several divisions. Most of the sales invoices are for sales after 1960. When requesting an estimate for sales searches, you must specify the type of products, the years, and the state or states where the products were sold in which you are interested.

Below is a partial listing of products or type of sales box by each division.

Tax Invoices

The tax invoices are a separate group of sales boxes which came from JM’s Tax Department. The invoices have the same information as any typical invoice, showing companies sold to, shipped to, products sold, pricing, etc. They show sales from all divisions except asbestos fiber from Quebec. Only tax invoices covering the years 1968 to 1971 have been found in the

collection. They are sorted by state, with a few sorted by individual groups, such as Pipe sales, or to one company (e.g. Frigidaire in Ohio). The collection also includes eight international sales tax boxes.

Asbestos Fiber Division (AFD)

JM only mined chrysotile asbestos fiber. The sales are from its mines in Canada and California, and include sales to USA, Canada and international locations. These boxes have been indexed by ship-to state locations.

Building Products Division (BPD)

Products include ACE (Asbestos Cement Extrusions) – Large building wall panels; Asbestobord; Asbestos Ebony; Colorlith, Colorceran; Fesco Board and Insulation; Flat Transite, Corrugated Transite, Transite Core Plates; Flexboard, Permatone; Roofing Cements; Roofing products - commercial and residential; and Siding Shingles. These boxes have not been reviewed often so their indexing is minimal.

Canadian Products Division (CPD)

All products except fiber sold and manufactured in Canada fall into this group.

Contract Units (CU)

JM operated Contract Units which bid on and installed JM products on site. These CU's operated from the 1950s through at least 1987. The collection includes boxes from the contract units in Huntsville, AL; Denver, CO; Jacksonville, FL; Indianapolis, IN; Detroit, MI; Kansas City, MO; St. Louis, MO; Albany, NY; Pittsburgh, PA; Cincinnati, OH; Columbus, OH; Knoxville, TN; Dallas, TX; Houston, TX; San Antonio, TX; and Canada. Other CU records may be found among the tax invoices and accounting invoices.

Insulation Products Division (IPD)

Products include: Aerospace products – Min-K, Thermoflex; Ceramic Fiber Products; Cloth and Textiles; Electrical Papers; Firebrick; Insulating Cements; Marinite Products; Millboard; Pipe Insulation – 85% Magnesia, Superex, Thermobestos. About one-third of these boxes have been indexed by ship-to state. Sales of Marinite products have all been indexed by ship-to state.

International Division (INT)

All products, except fiber, sold and manufactured in countries other than the U.S. and Canada fall into this group.

Packing & Friction Materials Division (PFM)

Products include: Brakes - Automobile, Truck and Machinery; Clipper Oil Seals; Gaskets; Rope Packing; Sealing Compounds; Sheet Packing; Thermo-Pac; Uneepac. Only about a quarter of these boxes have been indexed by ship-to state.

Pipe Division (PIPE)

Products include: Chemtite; Conduit and Duct; Irrigation Pipe; PVC Pipe; Pressure Pipe; Sewer Pipe; and Water Pipe. The majority of Pipe sales boxes have been indexed by ship-to state.

Sales Offices and Warehouses

The ACRF has records from the following sales offices and warehouses: Dallas, TX warehouse; Englewood Cliffs, NJ sales offices; Houston, TX warehouse; Los Angeles, CA sales office and warehouse; Madison, WI warehouse; Pleasanton, CA sales office; Oak Brook, IL sales office; Montreal, PQ sales office, San Mateo, CA sales office, and Waterville, OH sales office.

Box Reviews – Non-Sales Records

The ACRF has records from the JM facilities that manufactured asbestos products. The records include, among other topics, manufacturing tallies, production records, safety notices and equipment, purchasing records, union agreements and negotiations, accounting records, engineering reports, and appropriations for fixing the plants and machinery. The plants include the following:

Asbestos, Quebec (asbestos mine and plant);
Billerica, MA (IPD only);
Denison, TX (Pipe only);
Ft. Worth, TX (Roofing only);
Green Cove Springs, FL (Pipe only);
Hayward, CA (Flooring only);
Laurinburg, NC (Cobra Brakes and Brakes only);
Lompoc, CA (diatomaceous earth mine);
Long Beach, CA (Pipe and IPD);
Los Angeles, CA (Roofing only);
Manville, NJ (most divisions);
Marrero, LA (BPD and Pipe);
Marshville, NC (Textiles only);
Nashua, NH (Transite Board and other A/C board products);
North Brunswick, NJ (Gaskets only);
Pittsburg, CA (mostly Roofing);
Savannah, GA (Roofing only);
Stockton, CA (Pipe only);
Tilton, NH (Electrical Papers only);

Toronto, Ontario (Canadian Products only);
Waukegan, IL (most divisions);
Zelienople, PA (Firebrick only).

In addition to plants, the ACRF has records from the product divisions generally, and records from several departments, including:

Corporate Information Center;
Corporate Relations;
Executive;
Health, Safety & Environment (HS&E)
Labor Relations;
Legal Department;
Patent & Licensing;
Research & Development (R&D);
Workers' Compensation (W/C)

NEW PAYMENT ADDRESS

Please note our new address for remitting payment:

**Finance Department
Claims Resolution Management Corporation
3120 Fairview Park Drive
Suite 200
Falls Church, VA 22042-4570**

RESEARCH COSTS

You may have the ACRF perform research for you or you may visit the ACRF to perform research yourself. For all research requests, a **minimum of \$285.00 will be charged for the ACRF Manager's time.**

A cost estimate for all research will be provided before any research starts. All estimates are based on "standard" reviews. Some reviews may take longer due to the organization of the boxes or the difficulty of the review. When an estimate for research is expected to exceed \$5,000, the estimated amount must be paid in advance to cover the up-front costs. Payment of the total amount invoiced must be received before any copies of records are released.

The costs shown below are subject to change. Please confirm current rates before authorizing or beginning research. Payments are due within 30 days of invoicing and should be mailed directly to CRMC as shown on the invoice. Non-payment will result in suspension of a firm's research privileges, which will be enforced firm-wide.

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|---|---|
| ACRF Manager's time | \$285.00 per hour |
| Project Coordinator/Research Assistant time | |
| Monitoring reviewers | \$115.00 per hour |
| Research assistance | \$ 151.00 per hour |
| Box Retrieval costs | |
| Notice of at least 48 hours | \$ 17.60 per box |
| Delivery Charge | \$175.70 roundtrip |
| Rush - same day | \$ 27.00 per box |
| Rush - delivery charge | \$270.25 roundtrip |
| Orders of less than 3 boxes | \$ 14.85 per order - additional charge |
| Large box costs - with notice | \$ 34.50 per box |
| Large box costs - Rush | \$ 59.50 per box |
| Scanned documents | \$ 0.61 per page |
| | <i>(oversize and color copies will be billed based on vendor charges)</i> |
| CD/Upload for Scanning | \$ 48.00 per CD |
| Branding, for scanned documents | \$ 0.05 per brand |
| Photocopying/Paper copy | \$ 0.41 per page |
| | <i>(oversize and color copies will be billed based on vendor charges)</i> |
| Bates Labeling, for paper copies | \$ 0.14 per label |
| Microfilm page duplication | \$ 0.79 per page plus assistant's time |
| Audio/Visual materials | Copy cost based upon vendor charge |
| Photographs | Copy cost based upon vendor charge |
| Fee for On-Site Research Facility Visits | \$ 94.00 per day |

By initialing this page, you agree that you have read, understood and accepted the terms of the Research Costs as outlined on this page. _____(initials)

CRMC
Asbestos Claims Research Facility

RESEARCH SERVICES AND VISITOR AGREEMENT AND RELEASE

By signing below, I certify that in return for research services provided by the Asbestos Claims Research Facility located at Gateway Plaza, 3390 Peoria Street, Unit 304 in Aurora, Colorado, and/or for the privilege of physical access to that Facility to review documents from its collection, I agree, on behalf of myself and my law firm or employer, to release the Asbestos Claims Research Facility, Claims Resolution Management Corporation (“CRMC”), CRMC’s parent, the Manville Personal Injury Settlement Trust, and the Manville Trustees (collectively “ACRF”), from all liability and accept the following terms and conditions:

I acknowledge that I have had an opportunity to review ACRF’s Information Packet, and that I understand it and agree to follow its rules and procedures. I have reviewed the Packet’s description of costs and agree promptly to pay all charges for ACRF’s provision of research services that I, my firm or employer request and/or that I incur relating to my visit to ACRF. I understand that in the event I or my firm or employer fail to pay such charges, ACRF may withhold from me and anyone else in my firm or organization further research services and access until the charges are paid in full.

I understand that ACRF maintains a large collection of documents generally relating to asbestos that were originally created or maintained by the Johns Manville Corporation, and that the collection is not fully indexed. While I expect ACRF’s employees to use their best efforts in helping me locate the information I seek within the collection, I agree that ACRF is not responsible for the completeness of the search assistance they provide me. I understand that certain ACRF documents produced by other parties in the course of insurance litigation with the Johns Manville Corporation are protected by a court order and that I would need to petition the relevant court to obtain permission to review and receive copies of those documents. I agree that ACRF may redact from documents confidential information regarding individual Johns Manville Corporation employees before providing me with copies.

I hereby assume all risks relating in any way to my visit to the Asbestos Claims Research Facility, including, without limitation, any risks of personal injury to myself or anyone else and damage to any property, and I completely release ACRF, its owners, employees, officers, directors and agents, from all liability, known and unknown, relating to this visit. I also agree to indemnify and hold ACRF harmless from any damage or loss relating in any way to my visit.

Signature

Date

Printed

Name of Law Firm or Employer

Email Address of Contact