

CLAIMS RESOLUTION MANAGEMENT CORPORATION  
ASBESTOS CLAIMS RESEARCH FACILITY  
INFORMATION PACKET  
RATES EFFECTIVE DATE: November 1, 2018

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 three 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 the Research Coordinator, Maggie Baumgardner at:

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

Inquiries also may be sent to Maggie via e-mail at: [mjbaumgardner@claimsres.com](mailto:mjbaumgardner@claimsres.com). In Maggie’s absence, you may contact Project Coordinator, Amy Benham, at the phone number above to check the status of on-going research requests.

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

I.From downtown Denver: Go east on 17<sup>th</sup> 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 33<sup>rd</sup> Avenue to Quentin Street. Turn left (one-way street) onto Quentin. 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.

II.From Denver International Airport: Go east on Interstate 70 to Peoria Street. Go south on Peoria over the “bridge”. Turn left on 33<sup>rd</sup> Avenue to Quentin Street. Turn left (one-way street) onto Quentin. 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.

II. RESEARCH COSTS

Costs associated with the review of documents are indicated below. For all research requests (including INQUIRE database searches), a minimum of \$265.00 will be charged for the Research Coordinator’s time. When visiting the facility, a fee will be charged for a Research Assistant to monitor you along with a daily fee of \$88.00. When an estimate for research is expected to exceed \$5,000, a deposit to cover these expenses is required. Payment of the total amount invoiced must be made prior to release of any copies of records requested.

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Research Coordinator's time	\$ 265.00	per hour
Research Assistants' time		
Monitoring reviewers	\$ 107.00	per hour
Research assistance	\$ 141.00	per hour
Box Retrieval costs		
Notice of at least 48 hours	\$ 16.38	per box
Delivery Charge	\$ 163.80	roundtrip
Rush – same day	\$ 25.20	per box
Rush – delivery charge	\$ 252.00	roundtrip
Orders of less than 3 boxes	\$ 13.86	per order - additional charge
Large box costs - with notice	\$ 32.13	per box
Large box costs - Rush	\$ 55.44	per box
Scanned documents	\$ 0.57	per page
<i>(oversize and color copies will be billed based on vendor charges)</i>		
CD/Upload for Scanning	\$ 44.00	per CD
Branding, for scanned documents	\$ 0.04	per brand
Photocopying/ Paper copy	\$ 0.38	per page
<i>(oversize and color copies will be billed based on vendor charges)</i>		
Bates Labeling, for paper copies	\$ 0.13	per label
Microfilm page duplication	\$ 0.70	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	\$ 88.00	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. Anyone interested in using the facility should confirm current rates before authorizing or beginning research.

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### III. RESEARCH and REVIEW Hours

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

You may have the Research Facility perform the research for you or you may visit the facility yourself. We recommend you make a reservation in advance to confirm availability, as there is limited space. An estimate can be provided before any research is done. All estimates are based on “standard” reviews. Some reviews make take longer due to organization of the boxes or the difficulty of the review.

### IV. SHIPPING COSTS

We send scanned documents via Hightail.com. Our preferred shipping company is Fed-Ex for paper and originals. Researchers must provide their Fed-Ex account number for shipment. If you do not have a Fed-Ex 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 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.

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

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 Research Assistant will be *present at all times* to insure that the documents are maintained in good order.

### VII. 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.

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### VIII. ATTIRE

It is recommended that casual, easily laundered clothing be worn (e.g., jeans) as the Research Facility is 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 and some indices are more detailed than others. Most index entries identify the general box contents, not the individual documents. Therefore, the Research Facility cannot guarantee that every box and/or its contents have been indexed. Thus 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.

The box index contains the following fields:

Plant and/or Division: For the most part, this field identifies where the boxes were produced or which division the records belong to. Locations and division for the boxes include:

#### PLANTS:

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

#### CONTRACT UNITS: (CU)

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

#### SALES OFFICES:

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

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### DIVISIONS:

Asbestos Fiber (AFD)	Building Products Division (BPD)
Canadian Products (CPD)	Executive
Filtration & Minerals (Filter)	Flooring Division (Floor)
Health, Safety & Environment (HS&E)	
Industrial/Insulation Products Div. (IPD)	
International	Legal Department
Packing & Friction Materials (PFM)	Patent & Licensing
Pipe Division	Research & Development (R&D)
Tax Department	Workers' Compensation (W/C)
Other miscellaneous divisions	

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.

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]

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:

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- **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,

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orders, or contracts to purchase; usually we did not include asbestos fiber purchases in this category.

- Sales: includes invoices, shipping documents, credit memoranda, customer complaints, orders, customer product inquiries, bids, and custom invoices; *there are 12,299 boxes which have this category marked, 10,238 are for the USA only.*
- 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.
- Fiber Purchase: identifies boxes KNOWN to have fiber purchase records.

State Sales: fields created to identify the states for sales invoices based on the SHIP TO location. We have separated out the index by product division in order to help narrow down the sales searches. Sales boxes for many of the divisions have not been indexed by state. Searches for specific states will include lists of boxes that have been indexed by state and those that have not been. For example, there are 1,622 Insulation Products Division sales boxes, only 485 of these boxes have been indexed by ship to state.

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Comments: a field created to describe the contents of the boxes. This field is not set up to describe every document or company mentioned within the box. This field will have the most information currently available regarding the box. However, for the majority of the boxes, this field is blank.

### 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 from various sources including; the boxes identified above, discovery in asbestos litigation, 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 dated from 1899 through 1992.

### C. INQUIRE Document Databases and Microfilm

Many of the microfilm rolls of microfilm are indexed by document and searchable in the INQUIRE system. Indexed documents include those designated by the Department of Justice during Manville’s litigation with the government (1986-87).

Categories of film 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

The INQUIRE system was begun by Manville’s legal department for litigation support in the early 1980s. These databases were not created to track sales information. 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 the facility. 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



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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 disk in WORD format. 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.