

# **EXHIBIT A**

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Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow In Her Own Right

*GLORIA LLEWELLYN*, Executrix of  
The Estate of John E. Llewellyn,  
Deceased, and Individually as  
Widow in Her Own Right,

Plaintiff,

v.

*DAVID W. MOSER* and *DFT Inc.*,  
*Et Al.*,

Defendants.

COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT  
CIVIL TRIAL DIVISION

**ASBESTOS CASE**

DECEMBER TERM, 2006

No. 03591

**INTERROGATORIES OF PLAINTIFF  
PROPOUNDED UPON DEFENDANT  
DAVID W. MOSER – SET ONE**

Plaintiff Gloria Llewellyn, Executrix of the Estate of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own Right, acting by and through her undersigned attorneys,

hereby propounds the following interrogatories, pursuant to Rule 4005 of the Pennsylvania Rules of Civil Procedure and this Court's Order of 20 August 2008, upon defendant David W. Moser (hereinafter referred to as "Moser"), as follows:

## **INSTRUCTIONS<sup>1</sup>**

1. Moser is to answer the within Interrogatories, in writing and under oath, within thirty (30) days after service.

2. The within Interrogatories are to be deemed continuing so as to require modified and/or supplemental answers in the event that Moser obtains information pertinent thereto between the time the answers are filed and the time the above-captioned action is concluded.

3. Where exact information cannot be furnished, estimated information is to be supplied. Where an estimate is used, it should be identified as such, and an explanation given as to the basis on which the estimates was made and the reason exact information cannot be furnished.

4. Where knowledge, information, or the identification of documents is requested, such request includes knowledge, information or documents in the possession of the servants, employees, agents, representatives and/or attorneys of Moser, as well as knowledge, information or documents in the possession of Durmanco Inc. and/or defendants Durabla Manufacturing Company, DFT, Inc. and/or Durabla Canada, Ltd. and/or the servants, employees, agents,

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<sup>1</sup> The within Instructions are to be deemed to be an integral part of the instant Interrogatories.

representatives and/or attorneys of Durmanco Inc. and/or defendants Durabla Manufacturing Company, DFT, Inc. and/or Durabla Canada, Ltd.

5. Each Interrogatory refers to information in the custody, control, and possession of Moser or known to Moser, as well as in the custody, control, and possession of or known to Moser's counsel, representatives, agents, servants, investigators, consultants, and other third parties retained by Moser and/or their counsel, employees, representatives, agents, servants, investigators and consultants, as well as information in the custody, control, and possession of or known to the counsel, representatives, agents, servants, investigators, consultants of Durmanco Inc. and/or defendants Durabla Manufacturing Company, DFT, Inc. and/or Durabla Canada, Ltd. and other third parties retained by Durmanco Inc. and/or defendants Durabla Manufacturing Company, DFT, Inc. and/or Durabla Canada, Ltd.

6. When, after a reasonable and thorough investigation using due diligence, you are unable to answer any of the instant Interrogatories, or any part thereof, because of lack of information available to you, specify in full and complete detail the reason the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of the Interrogatory in question and set forth the facts upon which such knowledge or belief is based.

7. When an Interrogatory asks that you identify documents, it shall be deemed a sufficient answer, where appropriate and possible, to furnish true and legible copies thereof together with your answers to these Interrogatories.

8. Where an Interrogatory does not specifically request particular facts, but where such facts are necessary in order to make the answer to the Interrogatory either comprehensible, complete or not misleading, you are requested to include such facts as part of the answer, and the Interrogatory shall be deemed specifically to request such fact or facts.

9. For the purposes of the instant Interrogatories, wherever necessary to insure completeness or accuracy, words importing the masculine gender include the feminine and neuter, words importing the feminine gender include the masculine and neuter, and words importing the neuter gender include the masculine and feminine.

10. If you claim any form of privilege, whether based on statute or otherwise, as a ground for not answering an Interrogatory or any part thereof, set forth in complete detail each and every fact upon which the privilege is based, including sufficient facts for the Court to make a full determination whether the claim of privilege is valid.

11. If you claim any form of privilege, whether based on statute or otherwise, as a ground for not describing requested oral communications, state the following with respect to each such communication: (a) the date thereof; (b) the name, the present or last known home and business addresses and telephone numbers, title (or position) and occupation of each person present during all or any part of the oral communication; (c) a description of the oral communication which is sufficient to identify the particular communication without revealing the information for which a privilege is claimed; and (d) with sufficient specificity to permit the Court to make a full determination whether the claim of privilege is valid, each and every fact or basis on which you claim any such privilege.

12. Where an Interrogatory calls for the description of a document as to which you claim a privilege, whether based on statute or otherwise, as a ground for not describing the document in question, set forth with respect to the document, in addition to any other information requested, its: (a) date; (b) author; (c) addressee, if any; (d) title (or position) of author; (e) type of tangible object (*e.g.*, letter, memorandum, telegram, chart, report, recording disc, *etc.*); (f) subject matter (without revealing the information as to which the privilege is claimed); (g) identify each person to whom the document's contents have been communicated by copy, sketch, exhibition, reading, or substantial summarization and state the date(s) of such communications; (h) identify each person supplying Defendant's attorneys with the information requested in subsections (a) through (g) hereof; (h) state the reason for withholding the document, identifying the paragraph to which it relates, and, explain the basis for the claimed privilege; and (h) with sufficient specificity to permit the Court to make a full determination whether the claim of privilege is valid, each and every fact or basis on which you claim such privilege.

13. Where an Interrogatory asks for a date or an amount, or any other specific information, it will not be adequate to state that the precise date, amount or other specific information is unknown to you where you are capable of approximating the information requested.

14. The use of a verb tense includes within its meaning all other tenses of that verb.

15. All produced documents shall be segregated and identified by the interrogatory to which they are primarily responsive. Documents shall be further segregated and identified as

required by particular paragraphs. Documents that are stored or maintained in files in the normal course of business shall be produced in those files or in such a manner as to identify the file from which each was taken.

16. For each Interrogatory, identify any persons providing information responsive to that Interrogatory and state whether the response is based on the personal knowledge of the person providing the information. If the response is not based on the personal knowledge of the person providing the information, identify the sources (*e.g.*, persons and/or documents) of that information.

## **DEFINITIONS<sup>2</sup>**

1. “Moser” shall mean the defendant herein, his assigns, and any of his present or former employees, agents and other representatives, including but not limited to employees, representatives, attorneys, accountants and auditors.

2. “DFT” shall mean defendant DFT, Inc. (hereinafter referred to as “DFT”), its predecessors, successors and assigns, and any of its present or former employees, agents and other representatives, including but not limited to employees, representatives, attorneys, accountants and auditors.

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<sup>2</sup> The within Definitions are to be deemed to be an integral part of the instant Interrogatories.

3. “Durabla” shall mean defendant Durabla Manufacturing Company (hereinafter referred to as “Durabla”), its predecessors, successors and assigns, and any of its present or former employees, agents and other representatives, including but not limited to employees, representatives, attorneys, accountants and auditors.

4. “Durabla Canada” shall mean defendant Durabla Canada, Ltd. (hereinafter referred to as “Durabla Canada”), its predecessors, successors and assigns, and any of its present or former employees, agents and other representatives, including but not limited to employees, representatives, attorneys, accountants and auditors.

5. “Durmanco” shall mean Durmanco Inc. (hereinafter referred to as “Durmanco”), its predecessors, successors and assigns, and any of its present or former employees, agents and other representatives, including but not limited to employees, representatives, attorneys, accountants and auditors.

6. “Asbestos,” except where otherwise expressly defined or qualified, shall be construed to mean raw asbestos, asbestos fiber, asbestos-containing products, products in which asbestos is or was a component part thereof, and products which specify asbestos products to be used with and/or as component parts of products.

7. “Asbestos related disease” shall be construed to mean asbestosis, lung cancer, mesothelioma, pleural disease and/or any disease medically or otherwise related or linked to or associated with asbestos exposure.

8. “Document” and “writing” are used interchangeably, shall have the same full meaning as in Rule 4009.1 of the Pennsylvania Rules of Civil Procedure, and shall include, but are not limited to: (a) any written or graphic matter of any kind or character, however produced or reproduced; (b) any electronically or magnetically recorded matter of any kind or character, however produced or reproduced; and (C) any other matter constituting the recording of data or information upon any tangible thing by any means, as well as any tangible thing on which information is recorded in writing, sound, electronic or magnetic impulse, or in any other manner, including but not limited to paper, cards, tapes, film, electronic facsimile, computer storage devices, or any other media. For the purposes of this definition, “matter” shall include, but shall not be limited to, memoranda, notes, minutes, records, photographs, correspondence, electronic mail, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, notes, records and recordings of oral conversations, and work papers, and shall also include, but shall not be limited to, originals and all copies which are different in any way from the original whether by interlineation, receipt stamp notation, indication of copies sent or received, or otherwise, as well as all preliminary versions, drafts or revisions of any of the foregoing and any supporting, underlying, or preparatory material, which are in your possession, custody, or control or in the possession, custody, or control of your present or former agents, representatives, or attorneys, or any and all persons acting on their behalf.

9. “Person” shall mean any individual, individual proprietorship, corporation, partnership, joint venture, association and any other legal entity, and any director, officer,

employee or agent working or acting on behalf thereof, and means both the singular and the plural.

10. “You” and “your” mean Moser, as defined above, and all persons who, acting either within or outside the scope of their employment or authority: (a) have acted or are acting on behalf of Moser; (b) were or are employed by Moser; (c) were or are agents or representatives of Moser; and (d) were or are in any way associated or affiliated with Moser, including Durmanco and/or Durabla, DFT and/or Durabla Canada.

11. “And” and “or” shall have both conjunctive and disjunctive meanings.

12. “All” and “any” mean both each and every.

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13. “Refers to,” “relates to,” and “reflects” shall mean embodies, pertains to, concerns, constitutes, comprises, or has any logical or factual connection with the subject matter of the Interrogatory in question.

14. “Employee” refers to any individual currently in the employ of, or at any time employed by, Moser and/or Durmanco and/or Durable, DFT and/or Durabla Canada.

15. “Identify,” “identity,” and “identification”:

(a) when used with reference to a natural person, means to set forth in the answer in each instance: (1) that person’s full name; (2) that person’s business affiliation and position during the relevant time period; (3) that person’s present (or last known, with an indication of the date of that latest knowledge) position and business affiliation; (4) the identity

of the person whom that person was representing or acting for; (5) that person's present (or last known, with an indication of the date of that latest knowledge) business address; (6) that person's present (or last known, with an indication of the date of that latest knowledge) residence address; and (7) whether that person was ever employed by any party to this action and, if so, the dates on which that person was employed by such party, the name of such party, and the last position that person held as an employee of such party ”;

(b) when used with reference to a corporation, partnership, association, joint venture, firm, or other business enterprise or legal entity, means to set forth in the answer in each instance: (1) the full name and present (or last known, with an indication of the date of that latest knowledge) address of such entity; and (2) a brief description of the primary business in which such entity is engaged. With respect to any particular entity, the information other than the full name need be given only once when”;

(c) when used with reference to a document or writing, means to set forth in the answer in each instance: (1) the type of document (*e.g.*, letter, memorandum, *etc.*); (2) the date the document was prepared; (3) the identity of the author of the document, and, if different, the identity of the originator and/or signer of the document; (4) the title, heading or other designation of the document; (5) the identity of the recipient or recipients of the document, except in those cases where the document is widely distributed, in which case set forth in the answer the organization of classes of persons who received the document; (6) any filing or identifying number of the document; (7) the present location and identity of the custodian of the document; and (8) the substance of the document's contents; and

(d) when used in reference to a meeting or to an oral communication, means to set forth in the answer in each instance: (1) the date thereof; (2) the place thereof; (3) the

identity of the individual who initiated said meeting or oral communication; (4) the identity of each person who participated in, or who was present at, any part of or all of said meeting or communication, or who became privy to the substance of said meeting or oral communication; (5) the purpose, content, and substance of said meeting or oral communication; (6) whether said meeting or oral communication occurred in person or by telephone, and, if both, the method by which each individual participated; and (7) the identity of all documents referring to, relating to, or embodying the substance of said meeting or oral communication.

16. "Date" means the day of the month, the month, and the year. If the exact date is not known and is not available, give the approximate date and indicate that it is only an approximation.

17. "Address" means the post-office-box number, street number, street, city, state or province, country (if other than the United States of America), and zip code.

18. "Identify the sources" means to: (a) identify all documents, non-written communications, meetings and other facts which support the allegation, contention, belief or answer in question; (b) to state the inferences drawn from each such source which support such allegation, contention, belief or answer; and (c) to identify all persons whom you know or believe to be knowledgeable with respect to the subject matter of such allegation, contention, belief or answer. Where a source is a public record (*e.g.*, a newspaper, trade journal, judicial or administrative opinion, *etc.*), a quotation and page reference of the material relied upon is to be supplied.

17. To “state the basis” for an allegation, contention, belief or answer means to identify the sources for such allegation, contention belief or answer and to set forth and explain the nature and application to the relevant facts contained in your response of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there is good ground to support such allegation, contention, belief or answer.

## **INTERROGATORIES**

1. Interrogatory: Identify yourself, including as part of your answer your full name, any other names by which you are now or have been known, date of birth, home address, home telephone number, as well as each business address and each business telephone number.

Answer:

2. Interrogatory: Did you incorporate DFT? If so, state:

- a. The date on which the Notice of Incorporation was first published and the publication in which it was published.
- b. The identity of any other person(s) who also served as incorporators, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- c. Your reasons for incorporating DFT.

Answer:

3. Interrogatory: If your answer to Interrogatory No. 2 was negative, did you in any way cause DFT to be incorporated? If so, state:

- a. What steps you took to cause DFT to be incorporated.
- b. The identity of each person who served as an incorporator, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- c. Your reasons for causing DFT to be incorporated.

Answer:

4. Interrogatory: Do you now own stock in DFT? If so, state:
  - a. The number of shares you own and the percentage of your ownership as measured against the total outstanding shares of DFT.
  - b. The par value of each share.
  - c. The specific consideration you paid or promised for the shares and the date(s) on which you paid or promised it.
  - d. Whether actual stock certificates were ever issued to you and, if so, the date(s) on which you received them and their current physical location.
  - e. The date, time and location of each shareholder meeting you have attended.

Answer:

5. Interrogatory: If your answer to Interrogatory No. 4 was negative, did you ever own stock in DFT? If so, state:
  - a. The number of shares you owned and the percentage of your ownership as measured against the total outstanding shares of DFT.
  - b. The date(s) on which you transferred the shares.

c. The identity of the person(s) or entity(s) to whom you transferred them, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

d. The consideration you received for the shares.

e. The date, time and location of each shareholder meeting you attended.

Answer:

6. Interrogatory: If your answer to Interrogatory No. 4 or Interrogatory No. 5 was affirmative, did you ever receive any dividends from DFT? If so, state:

a. The date(s) on which you received such dividends.

b. The amount of each such dividend.

Answer:

7. Interrogatory: Are you now an officer or employee of DFT? If so, state:

a. The office(s) or position(s) you hold.

b. The date on which you assumed each such office or position.

c. The salary, benefits and any other compensation you have received from DFT for serving in each such office or position for each of the past five years.

Answer:

8. Interrogatory: If your answer to Interrogatory No. 7 was negative, were you ever an officer or employee of DFT? If so state:

a. The office(s) or position(s) you held.

b. The date on which you assumed each such office or position.

c. The date on which you left each such office or position, your reason for leaving and the identity of the person who succeeded you.

d. The salary, benefits and any other compensation you received from DFT for serving in each such office or position for each of the five years prior to leaving that office.

Answer:

9. Interrogatory: Are you now or have you ever served as a director of DFT? If so, state:

a. The date on which you became a director.

b. The date on which you left office as a director, if applicable and your reasons for leaving office.

c. The number of directors on the Board of Directors during your period of service on the Board of Directors.

d. The identity of each person who served on the Board of Directors while you were serving, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

e. The date, time and location of each meeting of the Board of Directors you attended.

Answer:

10. Interrogatory: Did you ever loan money to DFT? If so, for each such loan, state:

a. The date of the loan.

b. The amount of the loan.

- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment DFT made to you on the loan.
- e. The interest rate, if any.
- f. The balance still owed you on the loan, if any.
- g. Your reasons for making the loan.

Answer:

11. Interrogatory: Did DFT ever loan you money? If so, for each such loan, state:
- a. The date of the loan.
  - b. The amount of the loan.
  - c. Whether there was a written loan agreement, promissory note or similar document.
  - d. The date and amount of each payment you made to DFT on the loan.
  - e. The interest rate, if any.
  - f. The balance still owed by you on the loan, if any.
  - g. Your reasons for seeking the loan.

Answer:

12. Interrogatory: Did DFT ever loan money to any person or entity you know? If so, for each such loan, state:
- a. The identity of the person or entity, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

- b. The date of the loan.
- c. The amount of the loan.
- d. Whether there was a written loan agreement, promissory note or similar document.

Answer:

13. Interrogatory: Did you ever guaranty or cosign any obligation of DFT? If so, for each such action, state:

- a. The identity of the creditor or lender, including their business address and business telephone number and their relationship to you, if any.
- b. The nature of the obligation you guaranteed or cosigned and the total amount of the obligation.
- c. The date on which you made or executed each such agreement.
- d. Your reasons for guaranteeing or cosigning the obligation.

Answer:

14. Interrogatory: Did DFT ever advance funds to you for services to be performed later? If so, for each such advance, state:

- a. The date of the advance.
- b. The amount of the advance.
- c. The services you were to perform, whether you performed them and the date(s) on which you performed them.

Answer:

15. Interrogatory: Are you now or have you ever been authorized to sign checks drawn on any account maintained in the name of DFT? If so, for each such account, state:

- a. The financial institution at which the account is maintained, including the business address and business telephone number of the institution.
- b. The account number.
- c. The period of time during which you held such authority.
- d. Whether the signature of any other person was required for such checks to be valid and, if so, the identity of each person who also possessed authority to sign such checks, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

Answer:

16. Interrogatory: Did you incorporate Durabla? If so, state:

- a. The date on which the Notice of Incorporation was first published and the publication in which it was published.
- b. The identity of any other person(s) who also served as incorporators, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- c. Your reasons for incorporating Durabla.

Answer:

17. Interrogatory: If your answer to Interrogatory No. 16 was negative, did you in any way cause Durabla to be incorporated? If so, state:

- a. What steps you took to cause Durabla to be incorporated.

b. The identity of each person who served as an incorporator, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

c. Your reasons for causing Durabla to be incorporated.

Answer:

18. Interrogatory: Do you now own stock in Durabla? If so, state:

a. The number of shares you own and the percentage of your ownership as measured against the total outstanding shares of Durabla.

b. The par value of each share.

c. The specific consideration you paid or promised for the shares and the date(s) on which you paid or promised it.

d. Whether actual stock certificates were ever issued to you and, if so, the date(s) on which you received them and their current physical location.

e. The date, time and location of each shareholder meeting you have attended.

Answer:

19. Interrogatory: If your answer to Interrogatory No. 18 was negative, did you ever own stock in Durabla? If so, state:

a. The number of shares you owned and the percentage of your ownership as measured against the total outstanding shares of Durabla.

b. The date(s) on which you transferred the shares.

c. The identity of the person(s) or entity(s) to whom you transferred them, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

d. The consideration you received for the shares.

e. The date, time and location of each shareholder meeting you attended.

Answer:

20. Interrogatory: If your answer to Interrogatory No. 18 or Interrogatory No. 19 was affirmative, did you ever receive any dividends from Durabla? If so, state:

a. The date(s) on which you received such dividends.

b. The amount of each such dividend.

Answer:

21. Interrogatory: Are you now an officer or employee of Durabla? If so, state:

a. The office(s) or position(s) you hold.

b. The date on which you assumed each such office or position.

c. The salary, benefits and any other compensation you have received from Durabla for serving in each such office or position for each of the past five years.

Answer:

22. Interrogatory: If your answer to Interrogatory No. 21 was negative, were you ever an officer or employee of Durabla? If so state:

a. The office(s) or position(s) you held.

b. The date on which you assumed each such office or position.

c. The date on which you left each such office or position, your reason for leaving and the identity of the person who succeeded you.

d. The salary, benefits and any other compensation you received from Durabla for serving in each such office or position for each of the five years prior to leaving that office.

Answer:

23. Interrogatory: Are you now or have you ever served as a director of Durabla? If so, state:

a. The date on which you became a director.

b. The date on which you left office as a director, if applicable and your reasons for leaving office.

c. The number of directors on the Board of Directors during your period of service on the Board of Directors.

d. The identity of each person who served on the Board of Directors while you were serving, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

e. The date, time and location of each meeting of the Board of Directors you attended.

Answer:

24. Interrogatory: Did you ever loan money to Durabla? If so, for each such loan, state:

a. The date of the loan.

- b. The amount of the loan.
- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment Durabla made to you on the loan.
- e. The interest rate, if any.
- f. The balance still owed you on the loan, if any.
- g. Your reasons for making the loan.

Answer:

25. Interrogatory: Did Durabla ever loan you money? If so, for each such loan, state:

- a. The date of the loan.
- b. The amount of the loan.
- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment you made to Durabla on the loan.
- e. The interest rate, if any.
- f. The balance still owed by you on the loan, if any.
- g. Your reasons for seeking the loan.

Answer:

26. Interrogatory: Did Durabla ever loan money to any person or entity you know? If so, for each such loan, state:

a. The identity of the person or entity, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

b. The date of the loan.

c. The amount of the loan.

d. Whether there was a written loan agreement, promissory note or similar document.

Answer:

27. Interrogatory: Did you ever guaranty or cosign any obligation of Durabla? If so, for each such action, state:

a. The identity of the creditor or lender, including their business address and business telephone number and their relationship to you, if any.

b. The nature of the obligation you guaranteed or cosigned and the total amount of the obligation.

c. The date on which you made or executed each such agreement.

d. Your reasons for guaranteeing or cosigning the obligation.

Answer:

28. Interrogatory: Did Durabla ever advance funds to you for services to be performed later? If so, for each such advance, state:

a. The date of the advance.

b. The amount of the advance.

c. The services you were to perform, whether you performed them and the date(s) on which you performed them.

Answer:

29. Interrogatory: Are you now or have you ever been authorized to sign checks drawn on any account maintained in the name of Durabla? If so, for each such account, state:

a. The financial institution at which the account is maintained, including the business address and business telephone number of the institution.

b. The account number.

c. The period of time during which you held such authority.

d. Whether the signature of any other person was required for such checks to be valid and, if so, the identity of each person who also possessed authority to sign such checks, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

Answer:

30. Did you incorporate Durabla Canada? If so, state:

a. The date on which the Notice of Incorporation was first published and the publication in which it was published.

b. The identity of any other person(s) who also served as incorporators, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

c. Your reasons for incorporating Durabla Canada.

Answer:

31. Interrogatory: If your answer to Interrogatory No. 30 was negative, did you in any way cause Durabla Canada to be incorporated? If so, state:

- a. What steps you took to cause Durabla Canada to be incorporated.
- b. The identity of each person who served as an incorporator, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- c. Your reasons for causing Durabla Canada to be incorporated.

Answer:

32. Interrogatory: Do you now own stock in Durabla Canada? If so, state:

- a. The number of shares you own and the percentage of your ownership as measured against the total outstanding shares of Durabla Canada.
- b. The par value of each share.
- c. The specific consideration you paid or promised for the shares and the date(s) on which you paid or promised it.
- d. Whether actual stock certificates were ever issued to you and, if so, the date(s) on which you received them and their current physical location.
- e. The date, time and location of each shareholder meeting you have attended.

Answer:

33. Interrogatory: If your answer to Interrogatory No. 32 was negative, did you ever own stock in Durabla Canada? If so, state:

- a. The number of shares you owned and the percentage of your ownership as measured against the total outstanding shares of Durabla Canada.
- b. The date(s) on which you transferred the shares.
- c. The identity of the person(s) or entity(s) to whom you transferred them, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- d. The consideration you received for the shares.
- e. The date, time and location of each shareholder meeting you attended.

Answer:

34. Interrogatory: If your answer to Interrogatory No. 32 or Interrogatory No. 33 was affirmative, did you ever receive any dividends from Durabla Canada? If so, state:

- a. The date(s) on which you received such dividends.
- b. The amount of each such dividend.

Answer:

35. Interrogatory: Are you now an officer or employee of Durabla Canada? If so, state:

- a. The office(s) or position(s) you hold.
- b. The date on which you assumed each such office or position.
- c. The salary, benefits and any other compensation you have received from Durabla Canada for serving in each such office or position for each of the past five years.

Answer:

36. Interrogatory: If your answer to Interrogatory No. 35 was negative, were you ever an officer or employee of Durabla Canada? If so state:

- a. The office(s) or position(s) you held.
- b. The date on which you assumed each such office or position.
- c. The date on which you left each such office or position, your reason for leaving and the identity of the person who succeeded you.
- d. The salary, benefits and any other compensation you received from Durabla Canada for serving in each such office or position for each of the five years prior to leaving that office.

Answer:

37. Interrogatory: Are you now or have you ever served as a director of Durabla Canada? If so, state:

- a. The date on which you became a director.
- b. The date on which you left office as a director, if applicable and your reasons for leaving office.
- c. The number of directors on the Board of Directors during your period of service on the Board of Directors.
- d. The identity of each person who served on the Board of Directors while you were serving, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- e. The date, time and location of each meeting of the Board of Directors you attended.

Answer:

38. Interrogatory: Did you ever loan money to Durabla Canada? If so, for each such loan, state:

- a. The date of the loan.
- b. The amount of the loan.
- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment Durabla Canada made to you on the loan.
- e. The interest rate, if any.
- f. The balance still owed you on the loan, if any.
- g. Your reasons for making the loan.

Answer:

39. Interrogatory: Did Durabla Canada ever loan you money? If so, for each such loan, state:

- a. The date of the loan.
- b. The amount of the loan.
- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment you made to Durabla Canada on the loan.
- e. The interest rate, if any.

- f. The balance still owed by you on the loan, if any.
- g. Your reasons for seeking the loan.

Answer:

40. Interrogatory: Did Durabla Canada ever loan money to any person or entity you know? If so, for each such loan, state:

a. The identity of the person or entity, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

b. The date of the loan.

c. The amount of the loan.

d. Whether there was a written loan agreement, promissory note or similar document.

Answer:

41. Interrogatory: Did you ever guaranty or cosign any obligation of Durabla Canada? If so, for each such action, state:

a. The identity of the creditor or lender, including their business address and business telephone number and their relationship to you, if any.

b. The nature of the obligation you guaranteed or cosigned and the total amount of the obligation.

c. The date on which you made or executed each such agreement.

d. Your reasons for guaranteeing or cosigning the obligation.

Answer:

42. Interrogatory: Did Durabla Canada ever advance funds to you for services to be performed later? If so, for each such advance, state:

- a. The date of the advance.
- b. The amount of the advance.
- c. The services you were to perform, whether you performed them and the date(s) on which you performed them.

Answer:

43. Interrogatory: Are you now or have you ever been authorized to sign checks drawn on any account maintained in the name of Durabla Canada? If so, for each such account, state:

- a. The financial institution at which the account is maintained, including the business address and business telephone number of the institution.
- b. The account number.
- c. The period of time during which you held such authority.
- d. Whether the signature of any other person was required for such checks to be valid and, if so, the identity of each person who also possessed authority to sign such checks, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

Answer:

44. Did you incorporate Durmanco? If so, state:

- a. The date on which the Notice of Incorporation was first published and the publication in which it was published.

b. The identity of any other person(s) who also served as incorporators, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

c. Your reasons for incorporating Durmanco.

Answer:

45. Interrogatory: If your answer to Interrogatory No. 44 was negative, did you in any way cause Durmanco to be incorporated? If so, state:

a. What steps you took to cause Durmanco to be incorporated.

b. The identity of each person who served as an incorporator, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

c. Your reasons for-causing Durmanco to be incorporated.

Answer:

46. Interrogatory: Do you now own stock in Durmanco? If so, state:

a. The number of shares you own and the percentage of your ownership as measured against the total outstanding shares of Durmanco.

b. The par value of each share.

c. The specific consideration you paid or promised for the shares and the date(s) on which you paid or promised it.

d. Whether actual stock certificates were ever issued to you and, if so, the date(s) on which you received them and their current physical location.

e. The date, time and location of each shareholder meeting you have attended.

Answer:

47. Interrogatory: If your answer to Interrogatory No. 46 was negative, did you ever own stock in Durmanco? If so, state:

a. The number of shares you owned and the percentage of your ownership as measured against the total outstanding shares of Durmanco.

b. The date(s) on which you transferred the shares.

c. The identity of the person(s) or entity(s) to whom you transferred them, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

d. The consideration you received for the shares.

e. The date, time and location of each shareholder meeting you attended.

Answer:

48. Interrogatory: If your answer to Interrogatory No. 46 or Interrogatory No. 47 was affirmative, did you ever receive any dividends from Durmanco? If so, state:

a. The date(s) on which you received such dividends.

b. The amount of each such dividend.

Answer:

49. Interrogatory: Are you now an officer or employee of Durmanco? If so, state:

a. The office(s) or position(s) you hold.

- b. The date on which you assumed each such office or position.
- c. The salary, benefits and any other compensation you have received from

Durmanco for serving in each such office or position for each of the past five years.

Answer:

50. Interrogatory: If your answer to Interrogatory No. 49 was negative, were you ever an officer or employee of Durmanco? If so state:

- a. The office(s) or position(s) you held.
- b. The date on which you assumed each such office or position.
- c. The date on which you left each such office or position, your reason for

leaving and the identity of the person who succeeded you.

- d. The salary, benefits and any other compensation you received from Durmanco for serving in each such office or position for each of the five years prior to leaving that office.

Answer:

51. Interrogatory: Are you now or have you ever served as a director of Durmanco? If so, state:

- a. The date on which you became a director.
- b. The date on which you left office as a director, if applicable and your

reasons for leaving office.

- c. The number of directors on the Board of Directors during your period of service on the Board of Directors.

d. The identity of each person who served on the Board of Directors while you were serving, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

e. The date, time and location of each meeting of the Board of Directors you attended.

Answer:

52. Interrogatory: Did you ever loan money to Durmanco? If so, for each such loan, state:

a. The date of the loan.

b. The amount of the loan.

c. Whether there was a written loan agreement, promissory note or similar document.

d. The date and amount of each payment Durmanco made to you on the loan.

e. The interest rate, if any.

f. The balance still owed you on the loan, if any.

g. Your reasons for making the loan.

Answer:

53. Interrogatory: Did Durmanco ever loan you money? If so, for each such loan, state:

a. The date of the loan.

b. The amount of the loan.

- c. Whether there was a written loan agreement, promissory note or similar document.
- d. The date and amount of each payment you made to Durmanco on the loan.
- e. The interest rate, if any.
- f. The balance still owed by you on the loan, if any.
- g. Your reasons for seeking the loan.

Answer:

54. Interrogatory: Did Durmanco ever loan money to any person or entity you know?

If so, for each such loan, state:

- a. The identity of the person or entity, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.
- b. The date of the loan.
- c. The amount of the loan.
- d. Whether there was a written loan agreement, promissory note or similar document.

Answer:

55. Interrogatory: Did you ever guaranty or cosign any obligation of Durmanco? If so, for each such action, state:

- a. The identity of the creditor or lender, including their business address and business telephone number and their relationship to you, if any.

b. The nature of the obligation you guaranteed or cosigned and the total amount of the obligation.

c. The date on which you made or executed each such agreement.

d. Your reasons for guaranteeing or cosigning the obligation.

Answer:

56. Interrogatory: Did Durmanco ever advance funds to you for services to be performed later? If so, for each such advance, state:

a. The date of the advance.

b. The amount of the advance.

c. The services you were to perform, whether you performed them and the date(s) on which you performed them.

Answer:

57. Interrogatory: Are you now or have you ever been authorized to sign checks drawn on any account maintained in the name of Durmanco? If so, for each such account, state:

a. The financial institution at which the account is maintained, including the business address and business telephone number of the institution.

b. The account number.

c. The period of time during which you held such authority.

d. Whether the signature of any other person was required for such checks to be valid and, if so, the identity of each person who also possessed authority to sign such checks, including their full name, home address, home telephone number, as well as each business address and each business telephone number and their relationship to you, if any.

Answer:

58. Interrogatory: Excluding publicly traded corporations as well as mutual funds and similar investments, do you own stock in any corporation other than DFT, Durabla, Durabla Canada and/or Durmanco? If so, for each such corporation, state:

- a. The identity of the corporation, including the business address and business telephone number.
- b. The nature of the business of the corporation.
- c. The number of shares you own and the date(s) on which you acquired them.
- d. The percentage of your ownership as measured against the total outstanding shares of the corporation.
- e. Any offices you now hold or have held in the corporation and the applicable dates.
- f. Whether you are now or have ever been a director of the corporation and the applicable dates.
- g. Whether the corporation has or previously had any business relationship with DFT.
- h. Whether the corporation has or previously had any business relationship with Durabla.
- i. Whether the corporation has or previously had any business relationship with Durabla Canada.

j. Whether the corporation has or previously had any business relationship with Durmanco.

Answer:

59. Interrogatory: If your answer to Interrogatory No. 58 was negative, have you during the past five years owned stock in any such corporation? If so, for each such corporation, state:

- a. The identity of the corporation, including the business address and business telephone number.
- b. The nature of the business of the corporation.
- c. The number of shares you owned and the date(s) on which you acquired them.
- d. The percentage of your ownership as measured against the total outstanding shares of the corporation.
- e. Any offices you now hold or have held in the corporation and the applicable dates.
- f. Whether you are now or have ever been a director of the corporation and the applicable dates.
- g. Whether the corporation has or previously had any business relationship with DFT.
- h. Whether the corporation has or previously had any business relationship with Durabla.

i. Whether the corporation has or previously had any business relationship with Durabla Canada.

j. Whether the corporation has or previously had any business relationship with Darmanco.

Answer:

60. Interrogatory: Do any of your family members or relatives own stock in DFT? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of DFT.

c. The date(s) on which the shares were acquired.

Answer:

61. Interrogatory: If your answer to Interrogatory No. 60 was negative, have any of your family members or relatives ever owned stock in DFT? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of DFT.

c. The date(s) on which the shares were transferred and the identity of the transferee.

Answer:

62. Interrogatory: Have any of your family members or relatives ever been employed or hired as an independent contractor by DFT? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The offices, positions or roles held by the person, the date they assumed each such office, position or role and the date they left each such office, position or role, if applicable.

c. The salary, benefits and any other compensation the person received for serving in each such office, position or role for each of the past five years.

Answer:

63. Interrogatory: Have any of your family members or relatives ever served on the Board of Directors of DFT? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date they assumed that position and the date they left that position, if applicable.

Answer:

64. Interrogatory: Do any of your family members or relatives own stock in Durabla? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durabla.

c. The date(s) on which the shares were acquired.

Answer:

65. Interrogatory: If you answer to Interrogatory No. 64 was negative, have any of your family members or relatives ever owned stock in Durabla? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durabla.

c. The date(s) on which the shares were transferred and the identity of the transferee.

Answer:

66. Interrogatory: Have any of your family members or relatives ever been employed or hired as an independent contractor by Durabla? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The offices, positions or roles held by the person, the date they assumed each such office, position or role and the date they left each such office, position or role, if applicable.

c. The salary, benefits and any other compensation the person received for serving in each such office, position or role for each of the past five years.

Answer:

67. Interrogatory: Have any of your family members or relatives ever served on the Board of Directors of Durabla? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date they assumed that position and the date they left that position, if applicable.

Answer:

68. Interrogatory: Do any of your family members or relatives own stock in Durabla Canada? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durabla Canada.

c. The date(s) on which the shares were acquired.

Answer:

69. Interrogatory: If you answer to Interrogatory No. 68 was negative, have any of your family members or relatives ever owned stock in Durabla Canada? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durabla Canada.

c. The date(s) on which the shares were transferred and the identity of the transferee.

Answer:

70. Interrogatory: Have any of your family members or relatives ever been employed or hired as an independent contractor by Durabla Canada? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The offices, positions or roles held by the person, the date they assumed each such office, position or role and the date they left each such office, position or role, if applicable.

c. The salary, benefits and any other compensation the person received for serving in each such office, position or role for each of the past five years.

Answer:

71. Interrogatory: Have any of your family members or relatives ever served on the Board of Directors of Durabla Canada? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date they assumed that position and the date they left that position, if applicable.

Answer:

72. Interrogatory: Do any of your family members or relatives own stock in Durmanco? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durmanco.

c. The date(s) on which the shares were acquired.

Answer:

73. Interrogatory: If you answer to Interrogatory No. 72 was negative, have any of your family members or relatives ever owned stock in Durmanco? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The number of shares owned and the percentage of ownership as measured against the total outstanding shares of Durmanco.

c. The date(s) on which the shares were transferred and the identity of the transferee.

Answer:

74. Interrogatory: Have any of your family members or relatives ever been employed or hired as an independent contractor by Durmanco? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The offices, positions or roles held by the person, the date they assumed each such office, position or role and the date they left each such office, position or role, if applicable.

c. The salary, benefits and any other compensation the person received for serving in each such office, position or role for each of the past five years.

Answer:

75. Interrogatory: Have any of your family members or relatives ever served on the Board of Directors of Durmanco? If so, for each such person, state:

a. The identity of the person, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date they assumed that position and the date they left that position, if applicable.

Answer:

76. Interrogatory: Did you incorporate or cause to be incorporated any other corporation? If so, for each such corporation, state:

a. The identity of the corporation, including the business address and phone number.

b. The nature of the business of the corporation.

c. Whether you own stock in the corporation and, if so, your percentage of ownership as measured against the total outstanding shares.

d. The identity of any relative or family member who owns stock in the corporation including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

e. Whether you hold or have held any offices in the corporation and, if so, the offices and the applicable dates.

f. Whether you are now or have served as a director of the corporation and, if so, the applicable dates.

Answer:

77. Interrogatory: At any time subsequent to 1 December 2006, did you transfer any stock owned in DFT to any other person or entity? If so, for each such transfer, state:

a. The identity of the transferee, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date of the transfer,

c. The consideration you received for the stock, if any.

Response:

78. Interrogatory: At any time subsequent to 1 December 2006, did you transfer any stock owned in Durabla to any other person or entity? If so, for each such transfer, state:

a. The identity of the transferee, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date of the transfer,

c. The consideration you received for the stock, if any.

Response:

79. Interrogatory: At any time subsequent to 1 December 2006, did you transfer any stock owned in Durabla Canada to any other person or entity? If so, for each such transfer, state:

a. The identity of the transferee, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date of the transfer,

c. The consideration you received for the stock, if any.

Response:

80. Interrogatory: At any time subsequent to 1 December 2006, did you transfer any stock owned in Durmanco to any other person or entity? If so, for each such transfer, state:

a. The identity of the transferee, including their full name, home address, home telephone number, as well as each business address and each business telephone number and the nature of their relationship to you.

b. The date of the transfer,

c. The consideration you received for the stock, if any.

Response:

81. Interrogatory: Have you ever been sued? If so, state:

a. The identity of the plaintiff, including their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The identity and address of the court in which the suit was filed.

c. The case number.

d. The general nature of the allegations against you and the relief requested.

e. The name, business address and business telephone number of the plaintiff's attorney.

f. The outcome of the suit.

Answer:

82. Interrogatory: Have you ever been convicted of a felony or of a misdemeanor offense involving fraud or dishonesty? If so, state:

- a. The date of each such conviction.
- b. The identity and address of the court in which the case was filed.
- c. The case number.
- d. The sentence imposed.

Answer:

83. Interrogatory: If you are found liable in your individual capacity for the claims which are the subject of the above-captioned action, do you now or did you at any time have any insurance policy through which you were or might be insured for the damages claimed by the Plaintiff? If so, state the kind of coverage, the name and address of the insurer, the policy number, the policy limits and whether a reservation of rights has been issued.

Answer:

84. Interrogatory: State the name, job title, current address and telephone number of each person who participated in the preparation of your answers to these Interrogatories, and,

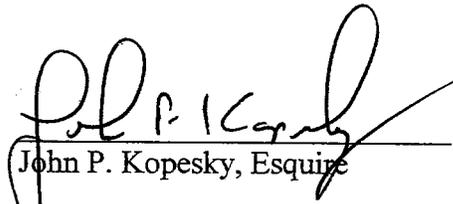
except in the case of your counsel or counsel for defendants DFT, Durabla and/or Durabla Canada, indicate the specific responses or information each contributed.

Answer:

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

By:



John P. Kopesky, Esquire

Attorney for Plaintiff

Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own  
Right

**CERTIFICATION OF SERVICE**

It is hereby certified by the undersigned member of the Bar of this Court that one (1) copy of the foregoing Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One) has been served upon the counsel whose name and address is set forth below via United States First Class Mail, postage prepaid, on Monday, the 29th day of September 2008.

HENRY F. REICHNER, ESQUIRE  
Reed Smith LLP  
2500 One Liberty Place  
1650 Market Street  
Philadelphia, Pennsylvania 19103

Attorney for Defendants  
David W. Moser and DFT, Inc.

WILLIAM F. MUELLER, ESQUIRE  
Clemente Mueller & Tobia  
POST Office Box 1296  
Morristown, New Jersey 07962-1296

Attorney for Defendant  
Durabla Manufacturing Company

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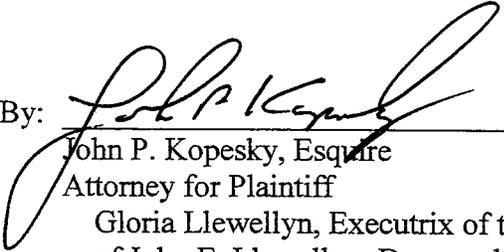
SUZANNE M. BACHOVIN, ESQUIRE  
Goldberg Segalla, LLP  
Suite 1418  
1700 Market Street  
Philadelphia, Pennsylvania 19103-3907

Attorney for Defendant  
Durabla Canada, Ltd.

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

By:

  
John P. Kopesky, Esquire  
Attorney for Plaintiff  
Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own  
Right

# **EXHIBIT B**

**SHEIN LAW CENTER, LTD.**

By: Benjamin P. Shein, Esquire  
John P. Kopesky, Esquire

Identification No. 42867

Identification No. 30112

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Attorneys for Plaintiff

Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow In Her Own Right

*GLORIA LLEWELLYN*, Executrix of  
The Estate of John E. Llewellyn,  
Deceased, and Individually as  
Widow in Her Own Right,

Plaintiff,

v.

*DAVID W. MOSER* and *DFT Inc.*,  
*Et Al.*,

Defendants.

COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT  
CIVIL TRIAL DIVISION

**ASBESTOS CASE**

DECEMBER TERM, 2006

No. 03591

**PLAINTIFF'S FIRST REQUEST FOR THE  
PRODUCTION OF DOCUMENTS ADDRESSED  
TO DEFENDANT DAVID W. MOSER**

Plaintiff Gloria Llewellyn, Executrix of the Estate of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own Right, acting by and through her undersigned attorneys,

hereby addresses the following requests for the production of documents pursuant to Rule 4009.11 of the Pennsylvania Rules of Civil Procedure and this Court's Order of 20 August 2008, to defendant David W. Moser (hereinafter referred to as "Moser"), as follows:

## **INSTRUCTIONS<sup>1</sup>**

1. Moser is to respond to the instant Requests for Production of Documents within thirty (30) days after service.

2. The documents requested herein are to be produced at the offices of Plaintiff's counsel as follows:

JOHN P. KOPESKY, ESQUIRE  
Shein Law Center, Ltd.  
Twenty-First Floor  
121 South Broad Street  
Philadelphia, Pennsylvania 19107

3. The documents requested herein are to be produced as they have been kept in the usual course of business or organized and labeled to correspond to the numbered paragraphs and/or categories of the instant Request for Production. If there are no documents responsive to a particular numbered paragraph or category, you are requested to so state in writing.

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<sup>1</sup> The within Instructions are to be deemed to be an integral part of the instant Requests for the Production of Documents.

4. The instant Requests for Production are to be deemed continuing so as to require the additional production of pertinent documents should such documents be discovered or obtained by you between the time your response to the instant Request is filed and the time the above-captioned matter is concluded.

5. For the purposes of the instant Requests for Production, wherever necessary to insure completeness or accuracy, words importing the masculine gender include the feminine and neuter, words importing the feminine gender include the masculine and neuter, and words importing the neuter gender include the masculine and feminine.

6. If a document requested herein is withheld by you under a claim of privilege, you are requested to provide a list of each document for which the privilege is claimed and, with respect to each such document, you are requested to provide: (a) the date of the document; (b) the author of the document; (c) the addressee(s) of the document, if any; (d) the title (or position) of the author of the document; (e) the type of tangible object (*e.g.*, letter, memorandum, telegram, chart, report, recording disc, *etc.*); (f) the subject matter of the document (without revealing the information as to which the privilege is claimed); (g) the identity of each person to whom the document's contents have been communicated by copy, sketch, exhibition, reading, or substantial summarization; (h) the date(s) of such communications referred to in subparagraph (g) hereof; (i) the identity of each person supplying Defendant's attorneys with the information requested in subsections (a) through (h) hereof; (h) the reason for withholding the document, identifying the paragraph to which it relates, and, explain the basis for the claimed privilege; and (i) with sufficient specificity to permit the Court to make a full determination whether the claim of privilege is valid, each and every fact or basis on which you claim such privilege.

7. If any document requested herein has been lost, discarded or destroyed, you are requested to identify each such document as completely as possible, and include in your identification: (a) the date of the disposal of the document in question; (b) the manner of the disposal of the document in question; (c) the reason for the disposal of the document in question; (d) the identity of the person authorizing the disposal of the document in question; and (e) the identity of the person disposing of the document in question.

8. If any document requested herein is in the possession, custody or control of any person other than Moser, and if Moser is unable, after the exercise of reasonable efforts, to obtain such documents for production to Plaintiff, you are requested to identify each such document as completely as possible, and to include in your identification: (a) the location of the document in question; and (b) the identity of the person having possession, custody or control of the document in question.

## **DEFINITIONS<sup>2</sup>**

Unless otherwise set forth herein, the Definitions set forth in the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One) are fully incorporated herein by reference and are to be deemed applicable to the instant Request for Production.

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<sup>2</sup> The within Definitions are to be deemed to be an integral part of the instant Requests for the Production of Documents.

## **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Request: Any and all documents identified by you in your answers to the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

2. Request: Any and all documents that are referred to in your answers to the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

3. Request: Any and all documents that are related in any way to any of your answers to the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

4. Request: Any and all documents that you referred to, consulted, reviewed or utilized in any way in preparing your answers to the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

5. Copies of the federal tax returns of Moser, including all schedules and attachments, for each of the tax years from 1995 to the present.

Response:

6. Request: Any and all documents that relate to your incorporation of defendant DFT, Inc. (hereinafter referred to as “DFT”), as referenced in your answer to Interrogatory No. 2 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

7. Request: Any and all documents that relate to any actions taken by you to cause DFT to be incorporated, as referenced in your answer to Interrogatory No. 3 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

8. Request: Any and all documents that otherwise relate to the incorporation of DFT.

Response:

9. Any and all documents that relate to your present ownership of stock in DFT, as referenced in your answer to Interrogatory No. 4 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

10. Request: Any and all documents that relate to your past ownership of stock in DFT, as referenced in your answer to Interrogatory No. 5 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

11. Request: Any documents that relate to your receipt of dividends from DFT, as referenced in your answer to Interrogatory No. 6 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

12. Request: Any and all documents that relate to your present status as an officer or employee of DFT, as referenced in your answer to Interrogatory No. 7 of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

13. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from DFT for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 7(c) of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

14. Request: Any and all documents that relate to your past status as an officer or employee of DFT, as referenced in your answer to Interrogatory No. 8 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

15. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from DFT for serving in any office or position for each of the

past five years, as referenced in your answer to Interrogatory No. 8(d) of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

16. Request: Any and all documents that relate to your status as a director (present or past) of DFT, as referenced in your answer to Interrogatory No. 9 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

17. Request: Any and all documents that relate to any loans that you have made to DFT, as referenced in your answer to Interrogatory No. 10 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

18. Request: Any and all documents that relate to any loans that you have received from DFT, as referenced in your answer to Interrogatory No. 11 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

19. Request: Any and all documents that relate to any loan by DFT to any person or entity known to you, as referenced in your answer to Interrogatory No. 12 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

20. Request: Any and all documents that relate to any obligation of DFT that you guaranteed or cosigned, as referenced in your answer to Interrogatory No. 13 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

21. Request: Any documents that relate to any funds that were advanced to you by DFT for services to be performed later, as referenced in your answer to Interrogatory No. 14 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

22. Request: Any documents that relate to your authority (present or past) to sign checks drawn on any account maintained in the name of DFT, as referenced in your answer to Interrogatory No. 15 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

23. Request: Any and all documents that relate to your incorporation of defendant Durabla Manufacturing Company (hereinafter referred to as “Durabla”), as referenced in your answer to Interrogatory No. 16 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

24. Request: Any and all documents that relate to any actions taken by you to cause Durabla to be incorporated, as referenced in your answer to Interrogatory No. 17 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

25. Request: Any and all documents that otherwise relate to the incorporation of Durabla.

Response:

26. Any and all documents that relate to your present ownership of stock in Durabla, as referenced in your answer to Interrogatory No. 18 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

27. Request: Any and all documents that relate to your past ownership of stock in Durabla, as referenced in your answer to Interrogatory No. 19 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

28. Request: Any documents that relate to your receipt of dividends from Durabla, as referenced in your answer to Interrogatory No. 20 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

29. Request: Any and all documents that relate to your present status as an officer or employee of Durabla, as referenced in your answer to Interrogatory No. 21 of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

30. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durabla for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 21(c) of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

31. Request: Any and all documents that relate to your past status as an officer or employee of Durabla, as referenced in your answer to Interrogatory No. 22 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

32. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durabla for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 22(d) of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

33. Request: Any and all documents that relate to your status as a director (present or past) of Durabla, as referenced in your answer to Interrogatory No. 23 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

34. Request: Any and all documents that relate to any loans that you have made to Durabla, as referenced in your answer to Interrogatory No. 24 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

35. Request: Any and all documents that relate to any loans that you have received from Durabla, as referenced in your answer to Interrogatory No. 25 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

36. Request: Any and all documents that relate to any loan by Durabla to any person or entity known to you, as referenced in your answer to Interrogatory No. 26 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

37. Request: Any and all documents that relate to any obligation of Durabla that you guaranteed or cosigned, as referenced in your answer to Interrogatory No. 27 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

38. Request: Any documents that relate to any funds that were advanced to you by Durabla for services to be performed later, as referenced in your answer to Interrogatory No. 28 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

39. Request: Any documents that relate to your authority (present or past) to sign checks drawn on any account maintained in the name of Durabla, as referenced in your answer to Interrogatory No. 29 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

40. Request: Any and all documents that relate to your incorporation of defendant Durabla Canada, Ltd. (hereinafter referred to as “Durabla Canada”), as referenced in your answer to Interrogatory No. 30 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

41. Request: Any and all documents that relate to any actions taken by you to cause Durabla Canada to be incorporated, as referenced in your answer to Interrogatory No. 31 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

42. Request: Any and all documents that otherwise relate to the incorporation of Durabla Canada.

Response:

43. Any and all documents that relate to your present ownership of stock in Durabla Canada, as referenced in your answer to Interrogatory No. 32 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

44. Request: Any and all documents that relate to your past ownership of stock in Durabla Canada, as referenced in your answer to Interrogatory No. 33 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

45. Request: Any documents that relate to your receipt of dividends from Durabla Canada, as referenced in your answer to Interrogatory No. 34 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

46. Request: Any and all documents that relate to your present status as an officer or employee of Durabla Canada, as referenced in your answer to Interrogatory No. 35 of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

47. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durabla Canada for serving in any office or position for

each of the past five years, as referenced in your answer to Interrogatory No. 35(c) of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

48. Request: Any and all documents that relate to your past status as an officer or employee of Durabla Canada, as referenced in your answer to Interrogatory No. 36 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

49. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durabla Canada for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 36(d) of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

50. Request: Any and all documents that relate to your status as a director (present or past) of Durabla Canada, as referenced in your answer to Interrogatory No. 37 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

51. Request: Any and all documents that relate to any loans that you have made to Durabla Canada, as referenced in your answer to Interrogatory No. 38 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

52. Request: Any and all documents that relate to any loans that you have received from Durabla Canada, as referenced in your answer to Interrogatory No. 39 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

53. Request: Any and all documents that relate to any loan by Durabla Canada to any person or entity known to you, as referenced in your answer to Interrogatory No. 40 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

54. Request: Any and all documents that relate to any obligation of Durabla Canada that you guaranteed or cosigned, as referenced in your answer to Interrogatory No. 41 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

55. Request: Any documents that relate to any funds that were advanced to you by Durabla Canada for services to be performed later, as referenced in your answer to Interrogatory No. 42 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

56. Request: Any documents that relate to your authority (present or past) to sign checks drawn on any account maintained in the name of Durabla Canada, as referenced in your

answer to Interrogatory No. 43 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

57. Request: Any and all documents that relate to your incorporation of Durmanco Inc. (hereinafter referred to as “Durmanco”), as referenced in your answer to Interrogatory No. 44 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

58. Request: Any and all documents that relate to any actions taken by you to cause Durmanco to be incorporated, as referenced in your answer to Interrogatory No. 45 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

59. Request: Any and all documents that otherwise relate to the incorporation of Durmanco.

Response:

60. Any and all documents that relate to your present ownership of stock in Durmanco, as referenced in your answer to Interrogatory No. 46 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

61. Request: Any and all documents that relate to your past ownership of stock in Durmanco, as referenced in your answer to Interrogatory No. 47 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

62. Request: Any documents that relate to your receipt of dividends from Durmanco, as referenced in your answer to Interrogatory No. 48 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

63. Request: Any and all documents that relate to your present status as an officer or employee of Durmanco, as referenced in your answer to Interrogatory No. 49 of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

64. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durmanco for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 49(c) of the of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

65. Request: Any and all documents that relate to your past status as an officer or employee of Durmanco, as referenced in your answer to Interrogatory No. 50 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

66. Request: Any and all documents that relate to the salary, benefits and other compensation you have received from Durmanco for serving in any office or position for each of the past five years, as referenced in your answer to Interrogatory No. 50(d) of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

67. Request: Any and all documents that relate to your status as a director (present or past) of Durmanco, as referenced in your answer to Interrogatory No. 51 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

68. Request: Any and all documents that relate to any loans that you have made to Durmanco, as referenced in your answer to Interrogatory No. 52 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

69. Request: Any and all documents that relate to any loans that you have received from Durmanco, as referenced in your answer to Interrogatory No. 53 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

70. Request: Any and all documents that relate to any loan by Durmanco to any person or entity known to you, as referenced in your answer to Interrogatory No. 54 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

71. Request: Any and all documents that relate to any obligation of Durmanco that you guaranteed or cosigned, as referenced in your answer to Interrogatory No. 55 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

72. Request: Any documents that relate to any funds that were advanced to you by Durmanco for services to be performed later, as referenced in your answer to Interrogatory No. 56 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

73. Request: Any documents that relate to your authority (present or past) to sign checks drawn on any account maintained in the name of Durmanco, as referenced in your answer to Interrogatory No. 57 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

74. Request: Any documents that relate to your present ownership of stock in any other corporation (excluding publicly traded corporations and mutual funds) other than DFT,

Durabla Canada and/or Durmanco, as referenced in your answer to Interrogatory No. 58 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

75. Request: Any documents that relate to your past (within the past five (5) years) ownership of stock in any other corporation (excluding publicly traded corporations and mutual funds) other than DFT, Durabla Canada and/or Durmanco, as referenced in your answer to Interrogatory No. 59 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

76. Request: Any documents that relate to the present ownership of stock in DFT by any of your family members or relatives, as referenced in your answer to Interrogatory No. 60 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

77. Request: Any documents that relate to the past ownership of stock in DFT by any of your family members or relatives, as referenced in your answer to Interrogatory No. 61 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

78. Request: Any documents that relate to any employment or hiring of any of your family members or relatives as independent contractors by DFT, as referenced in your answer to

Interrogatory No. 62 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

79. Request: Any documents that relate to any service by any of your family members or relatives on the Board of Directors of DFT, as referenced in your answer to Interrogatory No. 63 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

80. Request: Any documents that relate to the present ownership of stock in Durabla by any of your family members or relatives, as referenced in your answer to Interrogatory No. 64 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

81. Request: Any documents that relate to the past ownership of stock in Durabla by any of your family members or relatives, as referenced in your answer to Interrogatory No. 65 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

82. Request: Any documents that relate to any employment or hiring of any of your family members or relatives as independent contractors by Durabla, as referenced in your answer to Interrogatory No. 66 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

83. Request: Any documents that relate to any service by any of your family members or relatives on the Board of Directors of Durabla, as referenced in your answer to Interrogatory No. 67 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

84. Request: Any documents that relate to the present ownership of stock in Durabla Canada by any of your family members or relatives, as referenced in your answer to Interrogatory No. 68 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

85. Request: Any documents that relate to the past ownership of stock in Durabla Canada by any of your family members or relatives, as referenced in your answer to Interrogatory No. 69 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

86. Request: Any documents that relate to any employment or hiring of any of your family members or relatives as independent contractors by Durabla Canada, as referenced in your answer to Interrogatory No. 70 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

87. Request: Any documents that relate to any service by any of your family members or relatives on the Board of Directors of Durabla Canada, as referenced in your answer to Interrogatory No. 71 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

88. Request: Any documents that relate to the present ownership of stock in Durmanco by any of your family members or relatives, as referenced in your answer to Interrogatory No. 72 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

89. Request: Any documents that relate to the past ownership of stock in Durmanco by any of your family members or relatives, as referenced in your answer to Interrogatory No. 73 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

90. Request: Any documents that relate to any employment or hiring of any of your family members or relatives as independent contractors by Durmanco, as referenced in your answer to Interrogatory No. 74 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

91. Request: Any documents that relate to any service by any of your family members or relatives on the Board of Directors of Durmanco, as referenced in your answer to Interrogatory No. 75 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

92. Request: Any documents that relate to the incorporation of any other corporation that you incorporated, as referenced in your answer to Interrogatory No. 76 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

93. Request: Any documents that relate to the incorporation of any other corporation that you caused to be incorporated, as referenced in your answer to Interrogatory No. 76 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

94. Request: Any documents that relate to your the transfer of any stock in DFT owned by you, as referenced in your answer to Interrogatory No. 77 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

95. Request: Any documents that relate to your the transfer of any stock in Durabla owned by you, as referenced in your answer to Interrogatory No. 78 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

96. Request: Any documents that relate to your the transfer of any stock in Durabla Canada owned by you, as referenced in your answer to Interrogatory No. 79 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

97. Request: Any documents that relate to your the transfer of any stock in Durmanco owned by you, as referenced in your answer to Interrogatory No. 80 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

98. Request: Any documents (other than documents protected by the attorney-client privilege or the qualified privilege for attorney work product) that relate to any lawsuit in which you were a defendant, as referenced in your answer to Interrogatory No. 81 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

99. Request: Any documents (other than documents protected by the attorney-client privilege or the qualified privilege for attorney work product) that relate to your conviction of a felony or of a misdemeanor offense involving fraud or dishonesty, as referenced in your answer to Interrogatory No. 82 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

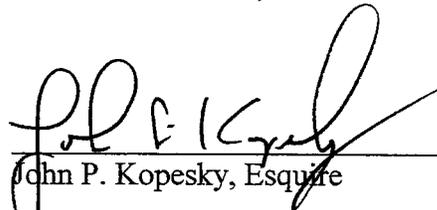
100. Request: Any documents that relate to any insurance policies through which you were-or might be insured for the damages claimed by the Plaintiff if you are found liable in your individual capacity for the claims which are the subject of the above-captioned action, as referenced in your answer to Interrogatory No. 83 of the Interrogatories of Plaintiff Propounded Upon Defendant David W. Moser (Set One).

Response:

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

By:



John P. Kopesky, Esquire

Attorney for Plaintiff

Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own  
Right

## CERTIFICATION OF SERVICE

It is hereby certified by the undersigned member of the Bar of this Court that one (1) copy of the foregoing Plaintiff's First Request For the Production of Documents Addressed To Defendant David W. Moser has been served upon the counsel whose name and address is set forth below via United States First Class Mail, postage prepaid, on Monday, the 29th day of September 2008.

HENRY F. REICHNER, ESQUIRE  
Reed Smith LLP  
2500 One Liberty Place  
1650 Market Street  
Philadelphia, Pennsylvania 19103

Attorney for Defendants  
David W. Moser and DFT, Inc.

WILLIAM F. MUELLER, ESQUIRE  
Clemente Mueller & Tobia  
POST Office Box 1296  
Morristown, New Jersey 07962-1296

Attorney for Defendant  
Durabla Manufacturing Company

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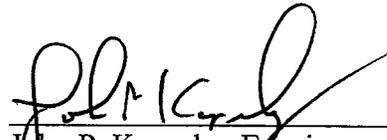
SUZANNE M. BACHOVIN, ESQUIRE  
Goldberg Segalla, LLP  
Suite 1418  
1700 Market Street  
Philadelphia, Pennsylvania 19103-3907

Attorney for Defendant  
Durabla Canada, Ltd.

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

By:



John P. Kopesky, Esquire  
Attorney for Plaintiff

Gloria Llewellyn, Executrix of the Estate  
of John E. Llewellyn, Deceased, and  
Individually as Widow in Her Own  
Right