

EXHIBIT C

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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
DFT, INC. – 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 DFT, Inc.

(hereinafter referred to as "DFT"), as follows:

INSTRUCTIONS¹

1. DFT 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 DFT 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 DFT, as well as knowledge, information or documents in the possession of Durmanco Inc. and/or defendants David W. Moser, Durabla Manufacturing Company and/or Durabla Canada, Ltd. and/or the servants, employees, agents,

¹ 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 David W. Moser, Durabla Manufacturing Company and/or Durabla Canada, Ltd.

5. Each Interrogatory refers to information in the custody, control, and possession of DFT or known to DFT, as well as in the custody, control, and possession of or known to DFT's counsel, representatives, agents, servants, investigators, consultants, and other third parties retained by DFT 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 David W. Moser, Durabla Manufacturing Company and/or Durabla Canada, Ltd. and other third parties retained by Durmanco Inc. and/or defendants David W. Moser, Durabla Manufacturing Company 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; (i) state the reason for withholding the document, identifying the paragraph to which it relates, and, explain the basis for the claimed privilege; and (j) 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.

DEFINITIONS²

1. “DFT” shall mean the defendant herein, 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.

2. “Moser” shall mean defendant David W. Moser (hereinafter referred to as “Moser”), 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 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 DFT, 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 DFT; (b) were or are employed by DFT; (c) were or are agents or representatives of DFT; and (d) were or are in any way associated or affiliated with DFT, including Durmanco and/or Moser, Durabla and/or Durabla Canada.

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

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

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, DFT and/or Durmanco and/or Moser, Durable 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: For each person answering these Interrogatories on behalf of DFT, state:

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

b. The offices or positions they hold within DFT.

Answer:

2. Interrogatory: With regard to DFT, state:

a. The full legal name of the corporation as it appears on the Certificate of Incorporation issued by the Secretary of State.

b. Each registered tradename, d/b/a/ name or popular name under which the Defendant does business or has done business and the applicable dates.

Answer:

3. Interrogatory: Identify each state or jurisdiction in which DFT is incorporated and the date on which it became incorporated in each such state or jurisdiction.

Answer:

4. Interrogatory: State DFT's principal place of business, including mailing address, physical address and telephone number.

Answer:

5. Interrogatory: For each person who presently owns stock in DFT, state:
- a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.
 - b. The date(s) upon which the person acquired their shares.
 - c. The consideration paid or promised for the shares and the date(s) on which it was paid or promised.
 - d. The number of shares owned and the percentage of shares owned as measured against the total outstanding shares of DFT.
 - e. Whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer or director of DFT and, if so, the identity of the other person and the nature of the relationship.

Answer:

6. Interrogatory: Excluding those identified in your answer to Interrogatory No. 5, identify each person who has owned stock in DFT at any time and for each such person state:
- a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.
 - b. The date(s) upon which the person acquired their shares.

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

d. The date(s) upon which the person transferred their shares and 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.

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

f. Whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer or director of DFT and, if so, the identity of the other person and the nature of the relationship.

Answer:

7. Interrogatory: Summarize how DFT was capitalized upon its incorporation, including:

a. The identity of each person or entity that purchased or subscribed to stock in DFT.

b. The number of shares purchased or subscribed by each such person or entity.

c. The amount paid or promised for the shares purchased or subscribed by each such person or entity and the date(s) of each such payment.

Answer:

8. Interrogatory: Identify each person who has served as an officer or management level employee of DFT at any time since 1 January 1995 and for each such person, state:

- a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.
- b. The office(s) or position(s) held and the applicable dates.
- c. The salary, benefits and any other compensation paid to the person since 1 January 1995.

Answer:

9. Interrogatory: Identify each person who has served as a director of DFT since 1 January 1995 and for each such person, state:

- a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.
- b. The period of time during which they held office, with applicable dates.
- c. The salary, benefits and any other compensation paid to the person for serving as a director, if any, since 1 January 1995.

Answer:

10. Interrogatory: Has DFT paid any dividends to stockholders? If so, state:

- a. The dates on which the dividends were paid.
- b. The identity of each shareholder receiving a dividend.
- c. The amount of the dividends.
- d. How the dividends were paid.

Answer:

11. Interrogatory: Has any shareholder, officer or director of DFT ever loaned money to DFT? If so, for each such loan, state:

- a. The identity of the person making the loan.
- 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.
- e. The date and amount of each payment DFT made on the loan.
- f. The interest rate, if any.
- g. The balance still owed by DFT, if any.

Answer:

12. Interrogatory: Has DFT ever loaned money to any shareholder, officer or director of DFT? If so, for each such loan, state:

- a. The identity of the person to whom the loan was made.
- 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.
- e. The date and amount of each payment the borrower has made to DFT on the loan.
- f. The interest rate, if any.
- g. The balance still owed to DFT, if any.

Answer:

13. Interrogatory: Excluding those people identified in your answer to Interrogatory No. 12, has DFT ever loaned money to any other person or entity? If so, for each such loan, state:

- a. The identity of the person or entity to which the loan was made.
- 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.
- e. The date and amount of each payment the borrower has made to DFT on the loan.
- f. The interest rate, if any.
- g. The balance still owed to DFT, if any.

Answer:

14. Interrogatory: Did DFT ever advance funds to any shareholder, officer, employee or director for services to be performed later? If so, for each such advance, state:

- a. The identity of the person to whom the funds were advanced.
- b. The date of the advance.
- c. The amount of the advance.
- d. The services to be performed, whether they were performed and when they were performed.

Answer:

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

a. The identity of the person or entity, including their home address, home telephone number, business address and business telephone.

b. The identity of the creditor or lender, including their business address and business telephone number.

c. The nature of the obligation and the total amount of the obligation.

d. The date on which the person or entity guaranteed or cosigned the obligation.

Answer:

16. Interrogatory: Did DFT ever guaranty or cosign the obligations of any other person or entity? If so, for each such action, state:

a. The identity of the person or entity for whom DFT guaranteed or cosigned on the obligation, including their home address, home telephone number, business address and business telephone.

b. The identity of the lender, including their business address and business telephone number.

c. The nature and amount of the obligation.

d. The date on which the Defendant guaranteed or cosigned the obligation.

e. DFT's reasons for guaranteeing or cosigning the obligation.

Answer:

17. Interrogatory: Does DFT now maintain any bank accounts in its own name, or has DFT maintained any bank accounts in its own since 1 January 1995? If so, for each such account, state:

- a. The identity of the financial institution at which the account is or was maintained, including the business address and business telephone number of the institution.
- b. The account number.
- c. The date the account was opened.
- d. The date the account was closed, if applicable.
- e. The identity of each person authorized to sign checks or access the account on behalf of DFT.

e. The current balance in the account.

Answer:

18. Interrogatory: Has DFT ever issued actual stock certificates to any shareholders of DFT? If so, state:

- a. The identity of each corporation, entity or person to whom certificates were issued.
- b. The date(s) on which such certificates were issued.

Answer:

19. Interrogatory: With regard to DFT, have there been any shareholder meetings held since 1 January 1995? If so, for each such meeting, state:

- a. The date, time and location of the meeting.
- b. The identity of each person in attendance at the meeting.

Answer:

20. Interrogatory: With regard to DFT, have there been any meetings of the Board of Directors held since 1 January 1995? If so, for each such meeting, state:

- a. The date, time and location of the meeting.
- b. The identity of each person in attendance at the meeting.

Answer:

21. Interrogatory: Has DFT made gifts to any person or entity since 1 January 1995? If so, for each such gift, state:

- a. The identity of the recipient.
- b. Whether it was a monetary gift or a gift of some other property and a brief description of what was given.
- c. The date of the gift.
- d. DFT's reasons for making the gift.

Answer:

22. Interrogatory: Since 1 January 1995, has DFT forgiven any debts owed to it? If so, for each such debt, state:

- a. The identity of the person or entity indebted to DFT.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.
- e. DFT's reasons for forgiving the debt.

Answer:

23. Interrogatory: Does DFT own or lease any real property? If so, for each parcel of property, state:

- a. The address of the property.
- b. Whether the property is owned or leased.
- c. The date the property was purchased or leased.
- d. The identity of any other corporation, entity or person who owns or leases

the property jointly with DFT date the property was purchased or leased.

Answer:

24. Interrogatory: At any time subsequent to 1 January 1995, did DFT transfer funds, assets or property of any kind to any person or entity outside the ordinary course of business or prepay any anticipated expenses? If so, for each such action, state:

- a. The identity of the transferee, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's reasons for the transfer.

Answer:

25. Interrogatory: Is DFT a Subchapter S corporation? If so, state the date on which the Subchapter S election was filed with the Internal Revenue Service.

Answer:

26. Interrogatory: If DFT is not a Subchapter S corporation, has DFT filed federal tax returns during any of the years since 1 January 1995? If so, state:

- a. The identity of the person who prepared the returns, including their business address and business telephone number.
- b. Whether the return was consolidated with the federal tax return of any other corporation and, if so, the identity of each such corporation.
- c. If the return was not consolidated with that of any other corporation, the taxable income of DFT as shown on each federal.

Answer:

27. Interrogatory: Since 1 January 1995, has any person prepared a balance sheet, income (profit & loss) statement, cash statement or annual report concerning DFT's financial activities? If so, for each such person, state:

- a. The identity of the person, including their business address and business telephone number.
- b. The documents prepared by the person and the dates on which they were prepared.
- c. The current location of the documents and the identity of the person with custody of them.

Answer:

28. Interrogatory: Has DFT ever been denied credit? If so, for each such denial, state:

a. The identity of the lender or financial institution, including the business address and business telephone number.

b. The amount of credit requested by DFT.

c. The date on which credit was denied.

Answer:

29. Interrogatory: Has DFT ever been sued? If so, for each such action, 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 DFT 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:

30. Interrogatory: : If DFT is found to be liable for the claim(s) which are the subject of this action, does DFT now have – or did DFT at any time have – any insurance policy through which it was 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:

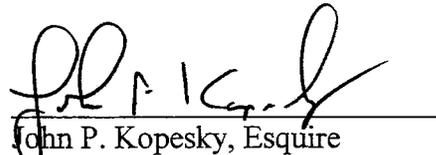
31. Interrogatory: Is DFT self-insured under any statute for the damages claimed by the Plaintiff? If so, specify the statute(s), whether DFT was required to post a bond, the identity of any company which issued a bond and the address of any such company.

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 DFT, Inc. (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
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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
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Suite 1418
1700 Market Street
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Attorney for Defendant
Durabla Canada, Ltd.

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

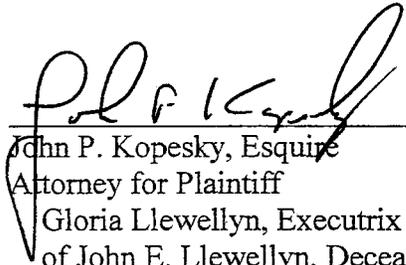
By: 
John P. Kopesky, Esquire
Attorney for Plaintiff
Gloria Llewellyn, Executrix of the Estate
of John E. Llewellyn, Deceased, and
Individually as Widow in Her Own
Right

EXHIBIT D

SHEIN LAW CENTER, LTD.

By: Benjamin P. Shein, Esquire

John P. Kopesky, Esquire

Identification No. 42867

Identification No. 30112

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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

**PLAINTIFF'S FIRST REQUEST FOR
THE PRODUCTION OF DOCUMENTS
ADDRESSED TO DEFENDANT DFT, INC.**

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 DFT, Inc. (hereinafter referred to as "DFT"), as follows:

INSTRUCTIONS¹

1. DFT 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.

¹ 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 the DFT, and if DFT 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.

DEFINITIONS²

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

² 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 DFT, Inc. (Set One).

Response:

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

Response:

5. Request: A copy of the Articles of Incorporation of DFT and any amendments thereto.

Response:

6. Request: A copy of the By-Laws of DFT and any amendments thereto

Response:

7. Request: A copy of the Certificate of Incorporation from the Secretary of State evidencing the corporate existence of DFT.

Response:

8. Request: A copy of the Notice of Incorporation of DFT as it appeared when first published.

Response:

9. Request: Copies of the minutes of all meetings of shareholders of DFT.

Response:

10. Request: Copies of the minutes of all meetings of the Board of Directors of DFT.

Response:

11. Request: Copies of all documents evidencing loans from Moser to DFT.

Response:

12. Request: Copies of all documents evidencing loans by DFT to Moser.

Response:

13. Request: Copies of all documents evidencing loans from any family member, relative or friend of Moser, or any business affiliated with Moser, to DFT.

Response:

14. Request: Copies of all documents evidencing loans by DFT to any family member, relative or friend of Moser or to any business affiliated with Moser.

Response:

15. Request: Copies of corporate records or ledgers evidencing the identity and address of each person or entity who has owned stock in DFT, the consideration paid or promised for the stock and the date(s) on which the consideration was paid or promised.

Response:

16. Request: Copies of corporate records or ledgers evidencing the issuance of actual stock certificates at any time since the incorporation of DFT, to whom they were issued and the date(s) of issue.

Response:

17. Request: Copies of corporate records or ledgers evidencing the payment of dividends to any shareholder since the incorporation of DFT, to whom the dividends were paid, the amounts paid and the date(s) of payment.

Response:

18. Request: For each bank account maintained in the name of DFT, a copy of the monthly statement for the period beginning 1 January 1995 to the present.

Response:

19. Request: Copies of the federal tax returns of DFT, including all schedules and attachments, for each of the tax years from 1995 to the present.

Response:

20. Request: Any and all documents that relate to the incorporation of DFT, as referenced in your answer to Interrogatory Nos. 2 and 3 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

21. Request: Any and all documents that relate to the ownership of stock in DFT, as referenced in your answer to Interrogatory Nos. 5 and 6 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

22. Request: Any and all documents that relate to the capitalization of DFT at the time of its incorporation, as referenced in your answer to Interrogatory No. 7 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

23. Request: Any and all documents that relate to the payment of dividends to the shareholders of DFT, as referenced in your answer to Interrogatory No. 10 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

24. Request: Any and all documents that relate to any loans to DFT by any shareholder, officer or director of DFT, as referenced in your answer to Interrogatory No. 11 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

25. Request: Any and all documents that relate to any loans by DFT to any shareholder, officer or director of DFT, as referenced in your answer to Interrogatory No. 12 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

26. Request: Any documents that relate to any loans by DFT, as referenced in your answer to Interrogatory No. 13 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

27. Request: Any and all documents that relate to the advance of funds by DFT to any shareholder, officer, director or employee for services to be performed later, as referenced in your answer to Interrogatory No. 14 of the of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

28. Request: Any and all documents that relate to any obligation of DFT that any person or entity guaranteed or cosigned, as referenced in your answer to Interrogatory No. 15 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

29. Request: Any and all documents that relate to any obligation of any person or entity that DFT guaranteed or cosigned, as referenced in your answer to Interrogatory No. 16 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

30. Request: Any and all documents that relate to any bank accounts maintained by DFT, as referenced in your answer to Interrogatory No. 17 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

31. Request: Any and all documents that relate to the issuance of stock certificates of any shareholders of DFT, as referenced in your answer to Interrogatory No. 18 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

32. Request: Any and all documents that relate to any shareholder meetings of DFT, as referenced in your answer to Interrogatory No. 19 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

33. Request: Any and all documents that relate to any meetings of the Board of Directors of DFT, as referenced in your answer to Interrogatory No. 20 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

34. Request: Any and all documents that relate to any gifts made by DFT, as referenced in your answer to Interrogatory No. 21 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

35. Request: Any and all documents that relate to any debts that have been forgiven by DFT, as referenced in your answer to Interrogatory No. 22 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

36. Request: Any documents that relate to DFT's ownership or lease of any real property, as referenced in your answer to Interrogatory No. 23 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

37. Request: Any documents that relate to the transfer of any assets by DFT, as referenced in your answer to Interrogatory No. 24 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

38. Request: Any and all documents that relate to DFT's Subchapter S election, as referenced in your answer to Interrogatory No. 25 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

39. Request: Any and all tax returns filed by DFT, as referenced in your answer to Interrogatory No. 26 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

40. Request: Any and all balance sheets, income (profit & Loss) statements, cash statements and/or annual reports of DFT, as referenced in your answer to Interrogatory No. 27 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

41. Request: Any and all documents that relate to any denial of credit to DFT, as referenced in your answer to Interrogatory No. 28 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

42. 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 DFT was a defendant, as referenced in your answer to Interrogatory No. 29 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One).

Response:

43. 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 for the claims which are the subject of the above-captioned action, as referenced in your answer to

Interrogatory No. 30 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc.
(Set One).

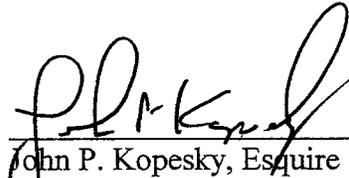
Response:

44. Request: Any documents that relate to the posting of any bond, as referenced in your answer to Interrogatory No. 31 of the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (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 DFT, Inc. 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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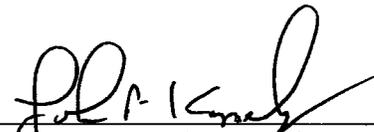
SUZANNE M. BACHOVIN, ESQUIRE
Goldberg Segalla, LLP
Suite 1418
1700 Market Street
Philadelphia, Pennsylvania 19103-3907

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 E

SHEIN LAW CENTER, LTD.

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

Identification No. 42867

Identification No. 30112

Twenty-First Floor

121 South Broad Street

Philadelphia, Pennsylvania 19107

Telephone: 215.735.6677

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bshein@sheinlaw.com

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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

**INTERROGATORIES OF PLAINTIFF
PROPOUNDED UPON DEFENDANT
DFT, INC. – SET TWO**

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 DFT, Inc. (hereinafter referred to as "DFT"), as follows:

INSTRUCTIONS¹

Unless otherwise set forth herein, the Instructions set forth in the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One) are fully incorporated herein by reference and are to be deemed applicable to the instant Interrogatories.

DEFINITIONS²

1. Unless otherwise set forth herein, the Definitions set forth in the Interrogatories of Plaintiff Propounded Upon Defendant DFT, Inc. (Set One) are fully incorporated herein by reference and are to be deemed applicable to the instant Interrogatories.

INTERROGATORIES

1. Interrogatory: For each person answering these Interrogatories on behalf of DFT, state:

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

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

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

b. The offices or positions they hold within DFT.

Answer:

2. Interrogatory: Identify each person who served as an incorporator of DFT, including their full name, home address, home telephone number, as well as each business address and each business telephone number.

Answer:

3. Interrogatory: Identify every corporation which owns more than ten percent (10%) of DFT's outstanding stock and for each such corporation, state:

a. The name of the corporation, its business address and its telephone number.

b. The consideration paid or promised for the shares and the date(s) on which it was paid or promised.

c. The number of shares owned and the percentage of shares owned as measured against the total outstanding shares of the corporation.

Answer:

4. Interrogatory: Identify each person who has served as an officer of DFT at any time since 1 January 1995 and for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

- b. The office(s) held and the applicable dates.
- c. The salary, benefits and any other compensation paid to the person.

Answer:

5. Interrogatory: Has any person identified in your answer to Interrogatory No. 4 ever served as an officer, management level employee or director of Durabla? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held in Durabla and the applicable dates.

Answer:

6. Interrogatory: Has any person identified in your answer to Interrogatory No. 4 ever served as an officer, management level employee or director of Durabla Canada? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held in Durabla Canada and the applicable dates.

Answer:

7. Interrogatory: Has any person identified in your answer to Interrogatory No. 4 ever served as an officer, management level employee or director of Durmanco? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held in Durmanco and the applicable dates.

Answer:

8. Interrogatory: Identify each person who has served as a director of DFT at any time since 1 January 1995 and for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The period of time during which they held office, with applicable dates.

Answer:

9. Interrogatory: Has any person identified in your answer to Interrogatory No. 8 ever served as an officer, management level employee or director of Durabla? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held and the applicable dates.

Answer:

10. Interrogatory: Has any person identified in your answer to Interrogatory No. 8 ever served as an officer, management level employee or director of Durabla Canada? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held and the applicable dates.

Answer:

11. Interrogatory: Has any person identified in your answer to Interrogatory No. 8 ever served as an officer, management level employee or director of Durmanco? If so, for each such person, state:

a. Their full name, home address, home telephone number, as well as each business address and each business telephone number.

b. The office(s) or position(s) held and the applicable dates.

Answer:

12. Interrogatory: Has Durabla, or any business enterprise or person affiliated with Durabla, ever loaned money to DFT? If so, for each such loan, state:

a. The identity of the corporation, entity or person making the loan.

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.

e. The date and amount of each payment DFT made on the loan.

f. The interest rate, if any.

g. The balance still owed, if any.

Answer:

13. Interrogatory: Has Durabla Canada, or any business enterprise or person affiliated with Durabla Canada, ever loaned money to DFT? If so, for each such loan, state:

- a. The identity of the corporation, entity or person making the loan.
- 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.
- e. The date and amount of each payment DFT made on the loan.
- f. The interest rate, if any.
- g. The balance still owed, if any.

Answer:

14. Interrogatory: Has Durmanco, or any business enterprise or person affiliated with Durmanco, ever loaned money to DFT? If so, for each such loan, state:

- a. The identity of the corporation, entity or person making the loan.
- 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.
- e. The date and amount of each payment DFT made on the loan.
- f. The interest rate, if any.
- g. The balance still owed, if any.

Answer:

15. Interrogatory: Has DFT ever loaned money to Durabla or any business enterprise or person affiliated with Durabla? If so, for each such loan, state:

- a. The identity of the corporation, entity or person to whom the loan was made.
- 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.
- e. The date and amount of each payment Durabla has made to DFT on the loan.
- f. The interest rate, if any.
- g. The balance still owed to DFT, if any.

Answer:

16. Interrogatory: Has DFT ever loaned money to Durabla Canada or any business enterprise or person affiliated with Durabla Canada? If so, for each such loan, state:

- a. The identity of the corporation, entity or person to whom the loan was made.
- 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.

e. The date and amount of each payment Durabla Canada has made to DFT on the loan.

f. The interest rate, if any.

g. The balance still owed to DFT, if any.

Answer:

17. Interrogatory: Has DFT ever loaned money to Durmanco or any business enterprise or person affiliated with Durmanco? If so, for each such loan, state:

a. The identity of the corporation, entity or person to whom the loan was made.

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.

e. The date and amount of each payment Durmanco has made to DFT on the loan.

f. The interest rate, if any.

g. The balance still owed to DFT, if any.

Answer:

18. Interrogatory: Did DFT ever advance funds to Durabla, or to any business enterprise or person affiliated with Durabla, for goods to be supplied or services to be performed at a later date? If so, for each such advance, state:

- a. The identity of the corporation, entity or person to whom the funds were advanced.
- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they were, in fact, supplied or performed, with applicable dates.

Answer:

19. Interrogatory: Did DFT ever advance funds to Durabla Canada, or to any business enterprise or person affiliated with Durabla Canada, for goods to be supplied or services to be performed at a later date? If so, for each such advance, state:

- a. The identity of the corporation, entity or person to whom the funds were advanced.
- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they were, in fact, supplied or performed, with applicable dates.

Answer:

20. Interrogatory: Did DFT ever advance funds to Durmanco, or to any business enterprise or person affiliated with Durmanco, for goods to be supplied or services to be performed at a later date? If so, for each such advance, state:

- a. The identity of the corporation, entity or person to whom the funds were advanced.

- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they

were, in fact, supplied or performed, with applicable dates.

Answer:

21. Interrogatory: Did Durabla, or any business enterprise or person affiliated with Durabla, ever advance funds to DFT for goods to be supplied or services to be performed later?

If so, for each such advance, state:

- a. The identity of the corporation, entity or person making the advance.
- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they

were, in fact, supplied or performed, with applicable dates.

Answer:

22. Interrogatory: Did Durabla Canada, or any business enterprise or person affiliated with Durabla Canada, ever advance funds to DFT for goods to be supplied or services

to be performed later? If so, for each such advance, state:

- a. The identity of the corporation, entity or person making the advance.
- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they

were, in fact, supplied or performed, with applicable dates.

Answer:

23. Interrogatory: Did Durmanco, or any business enterprise or person affiliated with Durmanco, ever advance funds to DFT for goods to be supplied or services to be performed later? If so, for each such advance, state:

- a. The identity of the corporation, entity or person making the advance.
- b. The date of the advance.
- c. The amount of the advance.
- d. The goods to be supplied or the services to be performed and whether they were, in fact, supplied or performed, with applicable dates.

Answer:

24. Interrogatory: Did DFT ever guaranty or cosign any obligation of Durabla, or any business enterprise or person affiliated with Durabla? If so, for each such action, state:

- a. The identity of the corporation, entity or person for whom DFT guaranteed or cosigned the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which DFT guaranteed or cosigned on the obligation.
- e. DFT's reasons for guaranteeing or cosigning the obligation.

Answer:

25. Interrogatory: Did DFT ever guaranty or cosign any obligation of Durabla Canada, or any business enterprise or person affiliated with Durabla Canada? If so, for each such action, state:

- a. The identity of the corporation, entity or person for whom DFT guaranteed or cosigned the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which DFT guaranteed or cosigned on the obligation.
- e. DFT's reasons for guaranteeing or cosigning the obligation.

Answer:

26. Interrogatory: Did DFT ever guaranty or cosign any obligation of Durmanco, or any business enterprise or person affiliated with Durmanco? If so, for each such action, state:

- a. The identity of the corporation, entity or person for whom DFT guaranteed or cosigned the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which DFT guaranteed or cosigned on the obligation.
- e. DFT's reasons for guaranteeing or cosigning the obligation.

Answer:

27. Interrogatory: Did Durabla, or any business-enterprise or person affiliated with Durabla, ever guaranty or cosign any obligation of DFT? If so, state:

- a. The identity of the corporation, entity or person who guaranteed or cosigned on the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which the corporation, entity or person guaranteed or cosigned the obligation.

Answer:

28. Interrogatory: Did Durabla Canada, or any business enterprise or person affiliated with Durabla Canada, ever guaranty or cosign any obligation of DFT? If so, state:

- a. The identity of the corporation, entity or person who guaranteed or cosigned on the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which the corporation, entity or person guaranteed or cosigned the obligation.

Answer:

29. Interrogatory: Did Durmanco, or any business enterprise or person affiliated with Durmanco, ever guaranty or cosign any obligation of DFT? If so, state:

- a. The identity of the corporation, entity or person who guaranteed or cosigned on the obligation.
- b. The identity of the lender, including their business address and business telephone number.
- c. The nature and amount of the obligation.
- d. The date on which the corporation, entity or person guaranteed or cosigned the obligation.

Answer:

30. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, purchased goods or services from Durabla, or any business enterprise or person affiliated with Durabla? If so, state:

- a. The general nature of the goods or services purchased.
- b. The identity of the corporation, entity or person from whom the goods or services were purchased.
- c. The total amount paid to the corporation, entity or person for such goods or services during each of the years since 1 January 1995.

Answer:

31. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, purchased goods or services from Durabla Canada, or any business enterprise or person affiliated with Durabla Canada? If so, state:

- a. The general nature of the goods or services purchased.

b. The identity of the corporation, entity or person from whom the goods or services were purchased.

c. The total amount paid to the corporation, entity or person for such goods or services during each of the years since 1 January 1995.

Answer:

32. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, purchased goods or services from Durmanco, or any business enterprise or person affiliated with Durmanco? If so, state:

a. The general nature of the goods or services purchased.

b. The identity of the corporation, entity or person from whom the goods or services were purchased.

c. The total amount paid to the corporation, entity or person for such goods or services during each of the years since 1 January 1995.

Answer:

33. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, sold goods or services to Durabla, or any business enterprise or person affiliated with Durabla? If so, state:

a. The general nature of the goods or services provided.

b. The identity of the corporation, entity or person to whom the goods or services were provided.

c. The total amount paid by the corporation, entity or person for such goods or services during each of the years since 1 January 1995.

d. The percentage of DFT's total sales attributable to transactions with Durabla, or any business enterprise or person affiliated with Durabla, during each of the past five years.

Answer:

34. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, sold goods or services to Durabla Canada, or any business enterprise or person affiliated with Durabla Canada? If so, state:

- a. The general nature of the goods or services provided.
- b. The identity of the corporation, entity or person to whom the goods or services were provided.
- c. The total amount paid by the corporation, entity or person for such goods or services during each of the years since 1 January 1995.
- d. The percentage of DFT's total sales attributable to transactions with Durabla Canada, or any business enterprise or person affiliated with Durabla Canada, during each of the past five years.

Answer:

35. Interrogatory: At any time since 1 January 1995, has DFT, in its ordinary course of business, sold goods or services to Durmanco, or any business enterprise or person affiliated with Durmanco? If so, state:

- a. The general nature of the goods or services provided.
- b. The identity of the corporation, entity or person to whom the goods or services were provided.

c. The total amount paid by the corporation, entity or person for such goods or services during each of the years since 1 January 1995.

d. The percentage of DFT's total sales attributable to transactions with Durmanco, or any business enterprise or person affiliated with Durmanco, during each of the past five years.

Answer:

36. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has DFT, since 1 January 1995, transferred money, assets or property to Durabla, or any business enterprise or person affiliated with Durabla? If so, for each such transfer, state:

a. The identity of the transferee, including their full name, business address and each business telephone number.

b. The date of the transfer.

c. A brief description of what was transferred, its value and the consideration, if any.

d. DFT's reasons for making the transfer.

Answer:

37. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has DFT, since 1 January 1995, transferred money, assets or property to Durabla Canada, or any business enterprise or person affiliated with Durabla Canada? If so, for each such transfer, state:

- a. The identity of the transferee, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's reasons for making the transfer.

Answer:

38. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has DFT, since 1 January 1995, transferred money, assets or property to Durmanco, or any business enterprise or person affiliated with Durmanco? If so, for each such transfer, state:

- a. The identity of the transferee, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's reasons for making the transfer.

Answer:

39. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has Durabla, or any business enterprise or person affiliated with Durabla, since 1 January 1995, transferred money, assets or property to DFT? If so, for each such transfer, state:

- a. The identity of the transferor, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's understanding of the transferor's reasons for making the transfer.

Answer:

40. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has Durabla Canada, or any business enterprise or person affiliated with Durabla Canada, since 1 January 1995, transferred money, assets or property to DFT? If so, for each such transfer, state:

- a. The identity of the transferor, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's understanding of the transferor's reasons for making the transfer.

Answer:

41. Interrogatory: Other than loans, advances or sales or purchases identified in DFT's answers to previous Interrogatories, has Durmanco, or any business enterprise or person affiliated with Durmanco, since 1 January 1995, transferred money, assets or property to DFT? If so, for each such transfer, state:

- a. The identity of the transferor, including their full name, business address and each business telephone number.
- b. The date of the transfer.
- c. A brief description of what was transferred, its value and the consideration, if any.
- d. DFT's understanding of the transferor's reasons for making the transfer.

Answer:

42. Interrogatory: Has DFT ever forgiven any debts owed to it by Durabla or any business enterprise or person affiliated with Durabla? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to DFT.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.
- e. DFT's reasons for forgiving the debt.

Answer:

43. Interrogatory: Has DFT ever forgiven any debts owed to it by Durabla Canada or any business enterprise or person affiliated with Durabla Canada? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to DFT.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.

- e. DFT's reasons for forgiving the debt.

Answer:

44. Interrogatory: Has DFT ever forgiven any debts owed to it by Durmanco or any business enterprise or person affiliated with Durmanco? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to DFT.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.
- e. DFT's reasons for forgiving the debt.

Answer:

45. Interrogatory: Has Durabla or any business enterprise or person affiliated with Durabla ever forgiven any debts owed to it by DFT or any business enterprise or person affiliated with DFT? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to Durabla.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.
- e. DFT's understanding of Durabla's reasons for forgiving the debt.

Answer:

46. Interrogatory: Has Durabla Canada or any business enterprise or person affiliated with Durabla Canada ever forgiven any debts owed to it by DFT or any business enterprise or person affiliated with DFT? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to Durabla Canada.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.
- e. DFT's understanding of Durabla Canada's reasons for forgiving the debt.

Answer:

47. Interrogatory: Has Durmanco or any business enterprise or person affiliated with Durmanco ever forgiven any debts owed to it by DFT or any business enterprise or person affiliated with DFT? If so, for each such debt, state:

- a. The identity of the corporation, entity or person indebted to Durmanco.
- b. The amount of the debt.
- c. The amount of debt forgiven.
- d. The date on which the debt was forgiven.

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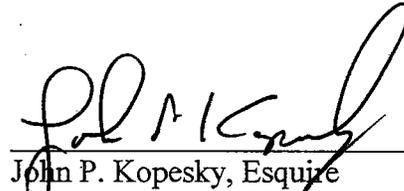
e. DFT's understanding of Durmanco's reasons for forgiving the debt.

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 DFT, Inc. (Set Two) 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.

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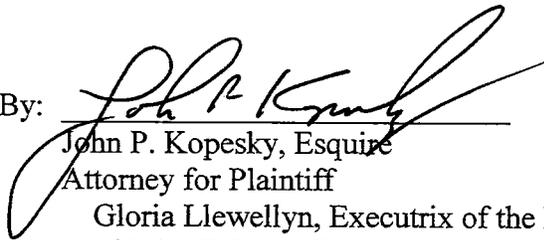
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Durabla Canada, Ltd.

Dated: 29 September 2008

SHEIN LAW CENTER, LTD.

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