

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al.,
Plaintiffs,

V.

W. R. GRACE & CO., et al.,
Defendants

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CIVIL ACTION
NO. 82-1672-S

SPECIAL INTERROGTORIES TO THE JURY
AS TO W. R. GRACE & CO.

SKINNER, D.J.

1. Have the plaintiffs established by a preponderance of the evidence that any of the following chemicals were disposed of at the Grace site after October 1, 1964 and substantially contributed to the contamination of Wells G and H by these chemicals prior to May 22, 1979?

- | | | |
|-------------------------------|--------------|-------------|
| (a) Trichloroethylene | Yes <u>x</u> | No _____ |
| (b) Tetrachloroethylene | Yes <u>x</u> | No _____ |
| (c) 1,2 Transdichloroethylene | Yes _____ | No <u>x</u> |

If you have answered "No" to all these chemicals, you need not proceed further.

William D. O'Neil
July 29, 1981

2. If you have answered "Yes" in question 1 as to any chemical(s), what, according to the preponderance of the evidence, was the earliest time that such chemical(s) disposed of on the Grace site after October 1, 1964 made a substantial contribution to the contamination of Wells G and H -- with respect to

	<u>Month</u>	<u>Year</u>
(a) Trichloroethylene?	<u> O </u>	<u> D </u>
(b) Tetrachloroethylene?	<u> O </u>	<u> D </u>
(c) 1,2 Transdichloroethylene?	<u> </u>	<u> </u>

[If, on the evidence before you, you are unable to determine by a preponderance of the evidence the appropriate date, write "ND" for Not Determined.]

3. If you have answered "Yes" in question 1 as to any chemical(s), please answer the following question:

Have the plaintiffs established by a preponderance of the evidence that the substantial contribution to the contamination of Wells G and H prior to May 22, 1979 by chemicals disposed of on the Grace site after October 1, 1964 was caused by negligence of Grace, that is, the failure of Grace to fulfill any duty of due care to the plaintiffs -- with respect to

William D. Royal
July 28, 1986

- (a) Trichloroethylene? Yes X No _____
- (b) Tetrachloroethylene? Yes X No _____
- (c) 1,2 Transdichloroethylene? Yes _____ No _____

[Only answer with respect to a chemical as to which you answered "Yes" on question 1.]

4. If you have answered "Yes" to any part of question 3, what, according to a preponderance of the evidence, was the earliest time at which the substantial contribution referred to in question 3 was caused by the negligent conduct of this defendant -- with respect to

	<u>Month</u>	<u>Year</u>
(a) Trichloroethylene?	<u>Sept</u>	<u>1973</u>
(b) Tetrachloroethylene?	<u>ND</u>	_____
(c) 1,2 Transdichloroethylene?	_____	_____

[If, on the evidence before you, you are unable to determine by a preponderance of the evidence the appropriate date, write "ND" for Not Determined.]

William P. Vogel
July 25, 1978