Proof of Claim Form T&N Limited and other Companies

This Proof of Claim form should be completed by all Trust Claimants against the EL Scheme Trust and the UK Asbestos Trust, or their legal advisers.

If you have an Asbestos-related personal injury claim against T&N Limited or any of the other Companies, or if you are in any doubt as to any aspect of your Trust Claim or as to the action you should take, you should consult your solicitor or another appropriate professional adviser without delay. If you require further assistance or advice, we suggest that you contact your solicitor, the Citizens Advice Bureau, an asbestos support group or your current or former trade union, which may be able to assist or put you in touch with specialist assistance.

The definitions explained in the Schedules of Defined Terms for the EL Scheme Trust and the UK Asbestos Trust are used in this form, save that for ease of reference:

(a)	"Trust Claimant" means the person bringing a Trust Claim against the EL Scheme Trust and/ or the UK Asbestos Trust;
(b)	"Injured Person" means the individual who suffered the physical, psychological, or other personal injuries or damage allegedly caused by exposure to Asbestos;
(c)	"T&N" means T&N Limited;
(d)	"Company" or "Companies" means any of the Scheme Companies for the purposes of the EL Scheme, and any of the Companies for which CVAs have been proposed;
(e)	"Trust Claim" means a Claim made against the EL Scheme Trust and/ or the UK Asbestos Trust pursuant to the EL Scheme or the CVAs and the related Trust Documents.
(f)	"UK Asbestos Trust" means the trust established pursuant to the CVAs.
(g)	"EL Scheme Trust" means the trust established pursuant to the EL Schemes of Arrangement.

All Trust Claimants should sign the Power of Attorney in the form that appears at Appendix 3.

A list of documents to send with this form appears at Appendix 4.

Please provide the following information and any supporting documentary evidence:

Question	To be completed by or on behalf of			
1	All Trust Claimants.			
2	Trust Claimants with Trust Claims arising from personal injuries suffered by another person, the Injured Person.			
3	All Trust Claimants.			
4	Trust Claimants with Trust Claims arising from personal injuries suffered by an Injured Person as a result of exposure to asbestos during and in the course of employment with a Company.			
5	Trust Claimants with Trust Claims arising from personal injuries suffered by an Injured Person as a result of exposure to asbestos during and in the course of employment with a Company.			
6	Trust Claimants with Trust Claims arising from personal injuries suffered by an Injured Person who was exposed to asbestos by a Company other than during and in the course of employment with that Company.			
7	All Trust Claimants.			
8 (a)	All Trust Claimants.			
8 (b)	Trust Claimants where the Injured Person is deceased.			
9	All Trust Claimants.			
10	All Trust Claimants.			
11	All Trust Claimants.			
12	All Trust Claimants.			
13	Trust Claimants with Trust Claims concerning a right to a contribution, reimbursement, indemnity or arising from subrogation rights.			
14	Trust Claimants with Trust Claims concerning a right to a contribution, reimbursement, indemnity or arising from subrogation rights.			

Question	To be completed by or on behalf of			
15	Trust Claimants with Trust Claims concerning a right to a contribution, reimbursement, indemnity or arising from subrogation rights.			
16	Trust Claimants with Trust Claims concerning a right to a contribution, reimbursement, indemnity or arising from subrogation rights.			
17	All Trust Claimants.			
18	Trust Claimants with Trust Claims arising from the Fatal Accidents Act 1976, the Law Reform (Miscellaneous Provisions) Act 1934, the Damages (Scotland) Act 1976, the Administration of Justice Act 1982, the Administration of Estates Act 1935, Law Reform (Miscellaneous Provisions) Act Northern Ireland 1937 and the Fatal Accidents (Northern Ireland) Order 1977, or any equivalent legislation wherever and whenever enacted or Trust Claimants where the Injured Person suffers from Disease Levels I or II.			
19	Trust Claimants with Trust Claims arising from the Fatal Accidents Act 1976, the Law Reform (Miscellaneous Provisions) Act 1934, the Damages (Scotland) Act 1976, the Administration of Justice Act 1982, the Administration of Estates Act 1935, Law Reform (Miscellaneous Provisions) Act Northern Ireland 1937 and the Fatal Accidents (Northern Ireland) Order 1977, or any equivalent legislation wherever and whenever enacted.			
20	Trust Claimants with Trust Claims arising from the Fatal Accidents Act 1976, the Law Reform (Miscellaneous Provisions) Act 1934, the Damages (Scotland) Act 1976, the Administration of Justice Act 1982, the Administration of Estates Act 1935, Law Reform (Miscellaneous Provisions) Act Northern Ireland 1937 and the Fatal Accidents (Northern Ireland) Order 1977, or any equivalent legislation wherever and whenever enacted.			
21	Trust Claims where the Injured Person is deceased, and where the Trust Claim is brought by the Injured Person's Personal Representative.			
22	Trust Claims where the Trust Claimant has elected that their Trust Claim will proceed by the Individual Review Process.			
23	Trust Claimants where the Trust Claimant has elected that their Trust Claim will proceed by the Individual Review Process.			
24	All Trust Claimants.			
25	All Trust Claimants.			

Question	To be completed by or on behalf of			
26	All Trust Claimants.			
27	All Trust Claimants.			
28	All Trust Claimants.			
29	All Trust Claimants.			
30	All Trust Claimants.			
31	Trust Claimants with Trust Claims against the EL Scheme Trust.			
32	All Trust Claimants.			
33	All Trust Claimants.			
34	All Trust Claimants.			

Section A: Contact Details

1	Please provide the Injured Person's (please refer to the definitions section on page 2) full name and address:		
	Title: Mr Mrs Miss Ms Other Sex: Male Female		
	First Name(s):		
	Last Name: Maiden Name:		
	Date of Birth (DD/MM/YYYY):		
	Date of Death (where applicable) (DD/MM/YYYY):		
	National Insurance Number (if known):		
	Address 1:		
	Address 2:		
	Town/City: County/Region:		
	Postcode: Country:		
2	Name and address of the Trust Claimant.		
	First Name(s):		
	Last Name:		
	Address 1:		
	Address 2:		
	Town/City: County/Region:		
	Postcode: Country:		
The Trust Claimant is the person making the Trust Claim against the EL Schemes Trust and/or to Asbestos Trust. The Trust Claimant will be the Injured Person, except where the Injured Person or where the Trust Claim concerns a right to contribution, reimbursement or indemnity or arises subrogation rights.			

3	Has a Solicitor been appointed to represent the Trust Claimant? Yes No					
	If Yes, please provide details:					
	Contact Name / Reference:					
	Firm Name:					
	Address 1:					
	Address 2:					
	Town/City: County/Region:					
	Country: Postcode:					
	DX:					

Section B: T&N Employee Claims

This section only needs to be completed where the Injured Person was an employee of T&N or any of the Companies, and was exposed to asbestos in the course of their work as an employee. Employee includes apprentices, and people taking part in youth training and work experience schemes.

4

Please state the Company that employed the Injured Person and provide the additional details requested below. If the Injured Person was employed by more than one Company, please provide the same details on a separate sheet for each additional company.

Appendix 1 lists centres of operations of the T&N group, and former names of Companies in the T&N group.

Company:		
Location:		
Occupation:		
Employment dates:	to	
Dates of Exposure to Asbestos to in this Employment:		
Was the exposure heavy moderate light		
(If known) please state the type of asbestos to which the Injured Person was exposed: crocidolite (blue) amosite (brown) chrysotile (white)		

5a

Please list the Injured Person's employment history (including self-employment) other than with a Company.

Please continue on a separate sheet if necessary.

Employer Please provide name of employer and location	Indicate if Shipyard	Occupation	Dates of employment Start Date End Date
	Yes 🗌 No 🗌		to
	Yes 🗌 No 🗌		to
	Yes No		to
	Yes 🗌 No 🗌		to
	Yes 🗌 No 🗌		to
	Yes 🗌 No 🗌		to
	Yes 🗌 No 🗌		to
	Yes 🗌 No 🗌		to

5b

If the Injured Person was exposed to asbestos during any of the employments listed at 5(a), please provide the following information:

	Please cont	tinue on a separate sheet if necessary - details are required of each exposure to asbestos.			
Person/entity who exposed the Injured Person to Asbestos					
Dates of E to Asb		to			
Was the expo	Was the exposure heavy moderate light				
	(If known) please state the type of asbestos to which the Injured Person was exposed: crocidolite (blue) amosite (brown) chrysotile (white)				
who exposed	Person/entity who exposed the Injured Person to Asbestos				
Dates of E to Asb	-	to			
Was the expo	Was the exposure heavy moderate light				
(If known) ple crocidolite (blu	•	ype of asbestos to which the Injured Person was exposed: e (brown) chrysotile (white)			
Person who exposed Person to	I the Injured				
Dates of E to Asb	-	to			
Was the exposure heavy moderate light					
(If known) please state the type of asbestos to which the Injured Person was exposed: crocidolite (blue) amosite (brown) chrysotile (white)					

Section C: Non-Employee Claims

This section needs to be filled in where the Injured Person was exposed to asbestos by T&N or any of the Companies other than during the course of their employment with T&N or that Company.			
6a	Please provide the details requested below. Please refer to Appendix 1 which lists the locations of operations of the Companies and their former names.		
Company wh exposure to			
Dates of e to asb	-	to	
Please explain how the Injured Person was exposed to asbestos			
If the Injured Person was exposed to asbestos through exposure to a T&N product, please state the name of this product			
If the Injured Person was exposed to asbestos through clothing of a T&N employee or former employee please give the full name, date of birth and NI number (where known) of the employee			
Was the exposure heavy moderate light			
(If known) please state the type of asbestos to which the Injured Person was exposed: crocidolite (blue) amosite (brown) chrysotile (white)			

6b	themselves	ed Person was exposed to asbestos by anyone other than a Company (including by as for example through DIY), give details: Intinue on a separate sheet if necessary - details are required of each time when the Injured as exposed to asbestos.		
Person/entity who exposed the Injured Person to Asbestos				
Dates of Exposure to Asbestos		to		
Was the exposure heavy moderate light				
(If known) please state the type of asbestos to which the Injured Person was exposed: crocidolite (blue) amosite (brown) chrysotile (white)				
Person who exposed Person to	I the Injured			
Dates of E to Asb		to		
Was the exposure heavy moderate light				

(If known) please state the type of asbestos to which the Injured Person was exposed:

crocidolite (blue) amosite (brown) chrysotile (white)

Section D: Personal Injuries/Limitation

(b)

	Where more than one disease has been diagnosed, please tick the columns next to each disease they have been diagnosed with.			
Pleural Disease not causing disability (Disease Level V)				
Diffuse Pleural Thickening (Disease Level IV)				
Asbestosis (Disease Level III)				
Lung Cancer (Disease Level II)				
Mesothelioma (Disease Level I)				
8	Please state: (a) For all Trust Claims, in row (a), the date on which the Injured Person discovered that their asbestos related disease(s) was/were partly or wholly caused by exposure to asbestos for which T&N or any of the Companies was responsible. (b) For Trust Claims only in respect of an Injured Person who is deceased, in row (b), the date on which the Trust Claimant discovered that the Injured Person's asbestos related disease(s) was/were partly or wholly caused by exposure to asbestos for which T&N or any of the Companies was responsible.			
	Where more than one disease has been diagnosed, please state the requested dates for both diseases, and indicate which date applies to which disease.			
	Disease - a	according to categories in Appendix 2	Date	
(a)			Injured Person discovered on / / / (dd/mm/yy)	

Injured Person discovered on

(dd/mm/yy)

Please refer to Appendix 2 of this form for details of how asbestos diseases are categorised.

Please tick the column next to the disease the Injured Person has been diagnosed with.

Section E: Medical and Exposure Evidence

9

Please explain the medical and exposure evidence on which the Trust Claimant relies. Please refer to Appendix 2 of this form which lists the categories of asbestos diseases, and describes the Presumptive Medical and Exposure Criteria which the Trustees of the EL Scheme Trust and the UK Asbestos Trust will apply in Expedited Review cases to determine whether an Injured Person suffers or suffered from an asbestos disease. In Individual Review cases, the Trustees will require these Criteria to be satisfied and may take into account any additional evidence provided by a Trust Claimant in support of the Trust Claim.

Please enclose a copy of the medical and exposure evidence on which the Trust Claimant relies with this form.

Date (DD/MM/YYYY)	Description of Evidence

10

Please provide details of the costs, if any, incurred by the Trust Claimant in providing the medical evidence referred to in Question 9.

Date (DD/MM/YYYY)	Amount (£)	Comments / Details

11	Please state whether the Injured Person smokes or has ever smoked, and if so, provide details. Yes No If yes, provide details.			ils.	
Type of s	moking	Cigarette Cigar Pipe Other (if other please state what type)			
Frequ	ency	per day/week since (please provide approximate date) Stopped since (dd/mm/yy)			
Section	Section F: Other Compensation				
12	Please state the amount and payor of any compensation received by the Injured Person in respect of their asbestos disease other than from T&N or any of the Companies, including any employer listed in question 5 above, and the Association of British Insurers, the Department of Trade and Industry and the Financial Services Compensation Scheme.			oyer	
Sou	rce	Amount (£)	Date (DD/MM/YYYY)		

Section G: Trust Claims Concerning a Right to a Contribution, Reimbursement, Indemnity or Arising from Subrogation Rights

This section should only be completed by or on behalf of Trust Claimants whose Trust Claim against the EL Scheme Trust and/ or the UK Asbestos Trust concerns a right to a contribution, reimbursement, indemnity, or who have subrogation rights, arising from their own liability to compensate another person.

13

Please state the date on which the right to bring the claim for contribution against T&N or one of the Companies accrued and confirm whether that date is the date of a judgment given in any civil proceedings, the date of an award published in an arbitration, or the date of an agreement with the person to whom the payment was made.

Date accrued (DD/MM/YYYY):				
lease state whether this is the date of a:				
udgment Arbitration Award Settlement Agreement				

14

Please state:

(a) The total amount paid by the Trust Claimant and/ or any other parties under the judgment, arbitration award, or the settlement agreement between the Trust Claimant and the Injured Person or their Personal Representative or Dependents and provide the details requested below, if available.

Where the payment was made by the Trust Claimant with other parties, please tell us for each, how much was paid by each party.

Please continue on another sheet if necessary

	D	amages Amount (Payment (£)
Date and Party (DD/MM/YYYY)	General	Special	Other (e.g. bereavement/ dependency)	in respect of recoverable benefits	in respect of costs

			Yes No Yes No Yes No
			Yes No No
	1		Yes No
			Yes 🗌 No 🗌
Please state how much the Trust Claimant is claiming against the Trusts.			
10	Please explain why the Trust Claimant cont the amount in paragraph 15.		panies is liable to pay
	Include details of the basis for any calculati	ion.	

Section H: Election of Review Procedure

When a Trust Claim is made, the Trust Claimant must elect whether the Trust Claim will proceed by Expedited or Individual Review. If the Expedited Review Process is chosen the Trusts can offer the Trust Claimant an amount up to the Expedited Review for the relevant Disease Level if the Trustees are satisfied that the Trust Claimant has presented a Trust Claim which meets the Presumptive Medical and Exposure Criteria. The Expedited Review Process is expected to be a quicker process than the Individual Review Process.

Trust Claimants may seek to establish a liquidated value for their Trust Claims which is greater than the Expedited Review Value by electing the Trust's Individual Review Process. However, the value of a Trust Claim that undergoes the Trust's Individual Review Process may be determined by the Trust to be less than the Expedited Review Value for the relevant Disease Level available in the Expedited Review Process, and in any event will not exceed the Maximum Value for the relevant Disease Level. The Individual Review process is expected to be a slower process than the Expedited Review process.

Important:

If a Trust Claimant whose Trust Claim is eligible for Expedited Review chooses to proceed by way of Individual Review, he will not be entitled to recover Actual Legal Costs in accordance with the EL Scheme TDP and the UK Asbestos Trust TDP unless the Trustees or the Expert determine that the value of their Established Claim is at least 10% higher than the Expedited Review Value for the relevant Disease Level in the Expedited Review Process.

Please note that for some categories of Trust Claimant, it is not possible to elect the Expedited Review Process. For details, please refer to Clause 2.4 of the UK Asbestos Trust and Clause 2.4 of the EL Scheme TDP.

Important:

If you elect the Expedited Review Process, you do not need to fill in questions 19 and 20 of Section I or Section J (Financial losses and further information).

	7

Please tick the relevant box.

Expedited Review

Individual Review

Section I: Claims by Relatives and Dependants and for Disease Levels I or II

This section should only be completed by or on behalf of Trust Claimants where the Injured Person has died, or where the Injured Person is suffering from Disease Levels I or II.

18

For Trust Claims where the Injured Person was exposed to Asbestos by a Company in England or Wales, please provide details of the Injured Person's dependants (as defined in section 1(3) of the Fatal Accidents Act 1976)

For Trust Claims where the Injured Person was exposed to Asbestos by a Company in Scotland, please provide details of the Injured Person's relatives (as defined in paragraph 1 of Schedule 1 of the Damages (Scotland) Act 1976.

For Trust Claims where the Injured Person was exposed to Asbestos by a Company in Northern Ireland, please provide details of the Injured Person's dependants and relatives (as defined in the Fatal Accidents (Northern Ireland) Order 1977).

For Trust Claims where the Injured Person was exposed to Asbestos by a Company in a different country, please provide details of the Injured Person's dependants or relatives in respect of whom the Trust Claim is submitted.

Name	Date of Birth (DD/MM/YYYY)	Relationship to Deceased Person

19

Please provide details of the amounts claimed by the Injured Person's relatives or dependants for loss of financial support, loss of services or loss of society.

Please continue on a separate sheet if necessary.

Amount (£)	Details of Claim

20

Please provide details of other losses claimed.

You will need to provide evidence of these further losses.

Category	Amount (£)	Further Details (where relevant)
Funeral Expenses		
Loss of Earnings		
Costs of Nursing Care		
Probate Costs		

21

Where the Trust Claim relates to a deceased Injured Person, and the Trust Claim is brought by the Injured Person's Personal Representative on behalf of their relatives or dependants, the Personal Representative must confirm that all reasonable enquiries have been made to identify all the Injured Person's relatives or dependants who may have a Trust Claim.

Please confirm by signing in the box

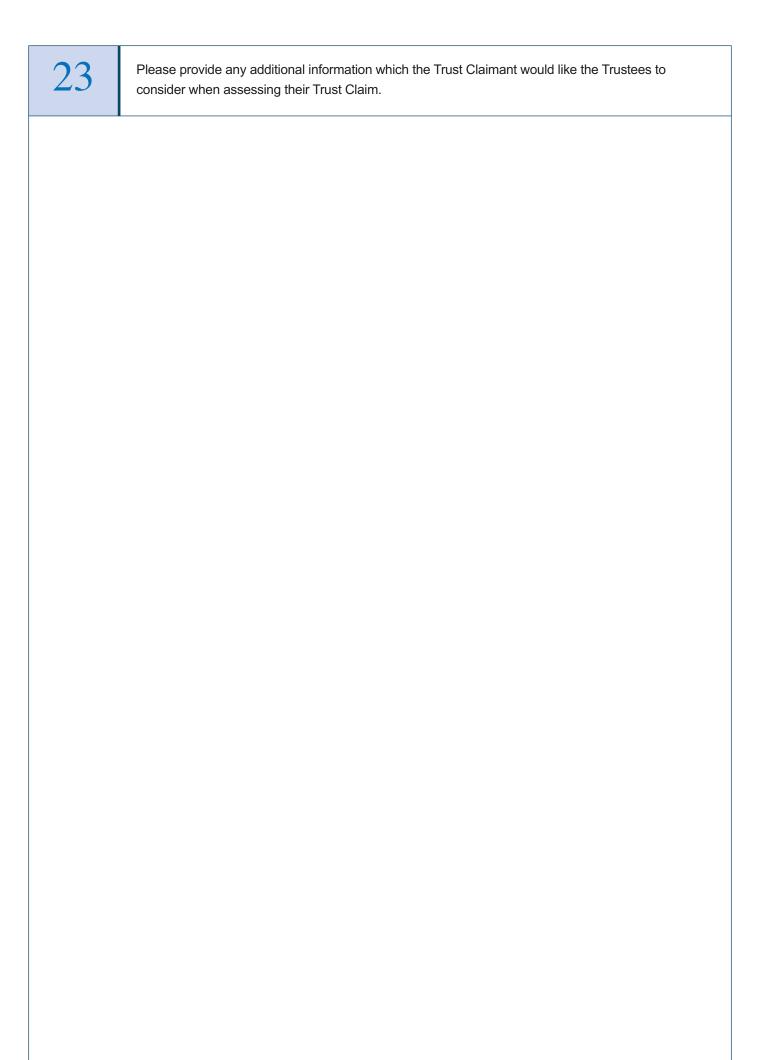
Section J: Financial Losses and other Information

This section only needs to be completed by Trust Claimants who elect to have their Trust Claims determined by Individual Review.

22

Please provide details of any financial losses claimed.

Date	Amount (£)	Details of loss



Section K: Legal Costs

24

Please provide details of the legal costs and disbursements incurred by the Trust Claimant in pursuing any Claim against any of the Companies, including the costs incurred in submitting this Proof of Claim form.

Date (DD/MM/YYYY)	Amount (£)	Comments / Details

Section L: Miscellaneous

25	Has the Trust Claimant entered into a standstill agreement with any of the Companies? Yes No No			
26	Has the Trust Claimant already notified the Administrators of any of the Companies of any claim made against any of the Companies? Yes No Service details.			
27	Does the Trust Claimant have a Court judgment against any of the Companies, or a binding settlement with any of the Companies? Yes No If Yes, please provide details.			
Date (DD/MM/YYYY)		Amount (£)	Details (i.e. provisional/final award, settlement/judgment)	

Has the Injured Person, their Personal Representative, Executor, or dependants, or relatives or the Trust Claimant received any previous payments from any of the Companies?

Yes No If Yes, please provide details:
Please continue on a separate sheet where necessary.

Date (DD/MM/YYYY)

Amount (£)

Basis for Payment

29	If the Trust Claim is admitted as an Established Claim, please indicate how the Trust Claimant would like to receive any payments due:				
	Cheque Yes No				
	If yes, please state:				
	Payee Name:				
	Address 1:				
	Address 2:				
	Town/City: County/Region:				
	Postcode: Country:				
	Telegraphic Transfer Yes No If yes please provide:				
	Bank:				
	Account Name:				
	Sort Code: Account No.:				
	NB where a Trust Claimant is represented by solicitors, the payment should be made to their solicitors.				

30

Payment of Actual Legal Costs direct to the Trust Claimant's solicitors:

Please state whether the Trust Claimant has given authority for any Actual Legal Costs assessed as due to them by the Trustees of the EL Scheme Trust and/ or the UK Asbestos Trust in accordance with the relevant TDP to be paid by separate cheque directly in favour of his solicitors identified in response to question 3 above.

Yes No

31

Notice to Trust Claimants who submit claims to the EL Scheme Trust:

Signing this form is confirmation that the Trust Claimant agrees to be bound by the terms of the EL Schemes.

32

Notice to Trust Claimants' solicitors who sign the Proof of Claim form:

If you sign this Proof of Claim form on the Trust Claimant's behalf, you are telling us that:

- You are authorised to sign this Proof of Claim form on the Trust Claimant's behalf.
- You have obtained the Trust Claimant's authority to receive any cheque paid by the Trustees of the EL Scheme Trust and/ or the UK Asbestos Trust in relation to their Trust Claim.
- Where you have answered "yes" to question 30 above, you have obtained the Trust Claimant's authority to receive a cheque in respect of Actual Legal Costs payable directly to your firm.
- The Trust Claimant has authorised you to provide the relevant consent in question 33.

33

Statement of consent as to the T&N Asbestos Trustee Company Limited's use, processing and disclosure of personal information.

In completing this Proof of Claim form or subsequent correspondence, the Trust Claimant might disclose personal information and data, including medical information ("personal information"). The Trust Claimant hereby acknowledges and agrees that the T&N Asbestos Trustee Company Limited:

- (a) may use the personal information for the purpose of evaluating the Trust Claim or Claims and any compensation that might be payable to them;
- (b) may disclose the personal information to any court of competent jurisdiction and any other Company, any insurance company, its or their administrators, liquidators, the EL Scheme Trustees, legal advisers, medical experts, employees, authorised agents, representatives and any third party against whom T&N or any of the Companies may have a Claim in respect of the Trust Claim. You should be aware that the T&N Asbestos Trustee Company Limited may disclose such information to persons based in countries outside the European Economic Area where there is a lawful basis to do so; and
- (c) Any personal information provided to the T&N Asbestos Trustee Company Limited will be used and processed in accordance with our privacy policy, which can be read at https://tandnasbestos.org.uk/data-protection-and-privacy-policy/.

2	1	
)	4	-

Signature of Trust Claimant or person authorised to sign on their behalf:			
Signature	Date		
Position in relation to Trust Claimant:			

Appendix 1: Locations of operation of some of the companies and their former names

LOCATIONS OF OPERATION OF SOME OF THE COMPANIES AND THEIR FORMER NAMES

North West		
Location	Current company name	Former company names
Ashburton Road West Trafford Park Manchester	T&N Shelf Twenty-Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986) Tenmat Limited (3 November 1986 – 5 August 1997)
Ashburton Road West Trafford Park Manchester	TAF International Limited	Turners Asbestos Fibres Limited (1 April 1963 – 2 July 1984)
74 Palmerston Street Ancoats Manchester	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Talbot Road Stretford Manchester	Federal-Mogul Engineering Ltd	The Glacier Metal Company Limited (7 April 1920 – 15 January 1999)
Asbestos House Fountain Street Manchester	TAF International Limited	Turners Asbestos Fibres Limited (1 April 1963 – 2 July 1984)
Cardinal House St. Mary's Parsonage Manchester	TAF International Limited	Turners Asbestos Fibres Limited (1 April 1963 – 2 July 1984)
Chorley New Road Horwich Bolton	JW Roberts Limited	No previous names
Everite Road Ditton Widnes	T&N Shelf Twenty Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986) Tenmat Limited (3 November 1986 – 5 August 1997)
Rooley Moor Road Rochdale	Telford Rubber Processors Limited	Buvos Limited (11 November 1938 – 28 June 1978)

North East		
Location	Current company name	Former company names
Unit F Tyne Tunnel Trading Estate Newcastle upon Tyne	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Mailing Street Newcastle upon Tyne	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Pattinson Town Washington	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
North Hylton Road Sunderland	Federal-Mogul Bradford Limited	Hepworth and Grandage Limited (5 January 1910 – 2 January 1990) AE Piston Products Limited (2 January 1990 – 2 January 1994) AE Goetze Automotive Limited (2 January 1994 – 4 April 1999)
White Lund Industrial Estate Morecambe	Federal-Mogul Sealing Systems (Rochdale) Limited	BIP Tools Limited (5 October 1945 – 11 March 1982) Storeys Decorative Products Limited (11 March 1982 – 13 May 1988) T&N Shelf Three Limited (13 May 1988 – 3 November 1992) TBA Composites Limited (3 November 1992 – 16 April 1997) T&N Composites Limited (17 April 1997 – 31 March 1999)
White Cross Mills Lancaster	Ashburton Road Services Limited	Storey Brothers and Company Limited (12 December 1902 – 1 April 1982) Storeys Industrial Products Limited (1 April 1982 – 9 March 1983)

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Location	Current company name	Former company names
White Abbey Road, Bradford	T&N Shelf Twenty Limited	Wood Bros. & Co. (Gaskets) Limited (16 October 1939 – 18 December 1970 Flexitallic Gaskets (Wood Bros.) Limited (18 December 1970 – 5 November 1975) Flexitallic Gaskets Limited (5 November 1975 – 11 February 1982) Flexitallic Limited (11 February 1982 - 14 April 1997)
Beehive Works Edderthorpe Street Leeds Road Bradford	T&N Shelf One Limited	The Universal Metal Packing Company Limited (8 August 1923 – 29 July 1994)
Lower Gratton Road Bradford	T&N Shelf Twenty Limited	Wood Bros. & Co. (Gaskets) Limited (16 October 1939 – 18 December 1970) Flexitallic Gaskets (Wood Bros.) Limited (18 December 1970 – 5 November 1975) Flexitallic Gaskets Limited (5 November 1975 – 11 February 1982) Flexitallic Limited (11 February 1982 - 14 April 1997)
Greyhound Drive Off Legrams Lane Bradford	Federal-Mogul Aftermarket UK Limited	AE Auto Parts Limited (18 March 1968 – 7 July 1995)
Newton Street/Bottomley Street Bradford	T&N Shelf Twenty Limited	Wood Bros. & Co. (Gaskets) Limited (16 October 1939 – 18 December 1970) Flexitallic Gaskets (Wood Bros.) Limited (18 December 1970 – 5 November 1975) Flexitallic Gaskets Limited (5 November 1975 – 11 February 1982) Flexitallic Limited (11 February 1982 - 14 April 1997)
St. John's Works Neville Road Bradford	Federal-Mogul Bradford Limited	Hepworth and Grandage Limited (5 January 1910 – 2 January 1990) AE Piston Products Limited (2 January 1990 – 2 January 1994) AE Goetze Automotive Limited (2 January 1994 – 4 April 1999)
Station Lane Heckmondwyke Cleckheaton	T&N Shelf Twenty Limited	Wood Bros. & Co. (Gaskets) Limited (16 October 1939 – 18 December 1970) Flexitallic Gaskets (Wood Bros.) Limited (18 December 1970 – 5 November 1975) Flexitallic Limited (11 February 1982 - 14 April 1997) Flexitallic Gaskets Limited (5 November 1975 – 11 February 1982)
Foley Street Sheffield	T&N Shelf Sixteen Limited	The Tempered Spring Company Limited (4 April 1960 – 12 December 1984) Tempered Group Limited (12 December 1984 – 27 June 1996)
Midland Works Armley Leeds	J.W. Roberts Limited	No previous names
Leigh Road Hindley Green Wigan	J.W. Roberts Limited	No previous names
Leigh Road Hindley Green Wigan	TBA Belting Limited	Bell's Poilite and Everite Company Limited (2 October 1933 – 14 June 1973) Halls Gaskets (Europe) Limited (14 June 1973 – 24 September 1984)
Leigh Road Hindley Green Wigan	TBA Belting (Residual) Ltd.	The Streetly Manufacturing Company Limited (11 July 1922 – 25 October 1982) T-Glass Fibres Limited (25 October 1982 – 3 December 1987) FGT Services Limited (3 December 1987 – 13 December 1995)

Midlands		
Location	Current company name	Former company names
Wood Lane Erdington Birmingham	Aeroplane & Motor Aluminium Castings Ltd	No previous names
Windsor Works Windsor Street Birmingham	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Pope's Lane Warley Oldbury	T&N Shelf Seven Limited	British Industrial Plastics Limited (15 June 1936 – 30 April 1982) BIP Chemicals Limited (30 April 1982 – 20 October 1995)
Ashbourne Road Buxton	Brake Linings Limited	No previous names
Ashbourne Road Buxton	Duron Limited	Raybestos-Belaco Limited (11 May 1922 – 1 April 1973) Belaco Limited (1 April 1973 – 22 may 1997)
Chapel-en-le Frith	Federal-Mogul Bradford Limited	Ferodo Limited (until 13 July 1998)
Industrial Estate Cromwell Road Bredbury Cheshire	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Tutnalls Lydney Gloucestershire	Federal-Mogul Camshaft Castings Ltd	Brico Metals Limited – (18 February 1966 – 20 February 1978) Lydmet Limited (20 February 1978 – 31 August 1996) Weyburn-Lydmet Limited (1 September 1996 – 7 July 1998)
Holbrook Lane Coventry	Federal-Mogul Sintered Products Ltd	Brico Engineering Limited – (23 December 1965 – 7 July 1998)
Kettlebrook Road, Tamworth	T&N Shelf Twenty Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986 Tenmat Limited (3 November 1986 – 5 August 1997)
Cawston House Cawston Rugby	Federal-Mogul Technology Limited	Associated Engineering Developments Limited (3 April 1969 – 27 January 1982 AE Developments Limited (27 January 1982 – 1 July 1987) T&N Technology Limited (1 July 1987 – 8 February 1999)
Second Avenue Bletchley Milton Keynes	High Precision Equipment Limited	No previous names since 1969
Lodge Farm Lodge Farm Industrial Estate Northampton	Mantro Engineering Co. Limited	Mantro Engineering Company Limited (1 January 1900 – 16 March 1989)
King Edward Street Grimsby Lincolnshire	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Magna Road South Wigston Leicester	T&N Shelf Eighteen Limited	Cannon & Stokes Limited (13 May 1912 – 20 May 1985) A.E. Turbine Components (Leicester) Limited (20 May 1985 – 5 August 1990)

Location	Current company name	Former company names
Llanfoist Works Abergavenny	Halls Gaskets Limited	No previous names
Station Road Rhoose	T&N Shelf Twenty Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986 Tenmat Limited (3 November 1986 – 5 August 1997)
7 Sydenham Road Belfast	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Ulster Bank Buildings 200 Agnes Street Belfast	Federal-Mogul Friction Products Ltd	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Griffiths Crossing Caernarfon	Federal-Mogul Friction Products Ltd	Ferodo Limited (until 13 July 1998)
Strathmore Works Collingdon Road Cardiff	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
134/136 Queen Street Cardiff	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
59/77 Admiral Street Glasgow	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
543 Calder Street Polmadie Glasgow	Federal-Mogul Engineering Ltd	The Glacier Metal Company Limited (7 April 1920 – 15 January 1999)
Cessnock Road Hurlford Kilmarnock	Federal-Mogul Eurofriction Ltd	Admaco Limited (24 August 1973 – 10 November 1981) Eurocomponents Limited (11 November 1981 – 25 June 1986) Euro Friction Limited (25 June 1986 – 17 July 1986) Eurofriction Limited (17 July 1986 – 4 January 1999)
Riccarton Kilmarnock	Federal-Mogul Shoreham Limited	Vandervell Products Limited (8 February 1940 – 30 January 1981) Vandervell Limited (9 June 1988 – 11 February 1991) Glacier Vandervell Limited (11 February 1991 – 15 January 1999) GKN Vandervell Limited (30 January 1981 – 9 June 1988) Federal-Mogul RPB Limited (15 January 1999 – 13 August 2001)
Agamemnon Street Dalmuir Glasgow	T&N Shelf Twenty Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986 Tenmat Limited (3 November 1986 – 5 August 1997)
4 Inchmuir Road Whitehill Industrial Estate Bathgate West Lothian	Federal-Mogul Shoreham Limited	Vandervell Products Limited (8 February 1940 – 30 January 1981) Vandervell Limited (9 June 1988 – 11 February 1991) Glacier Vandervell Limited (11 February 1991 – 15 January 1999) GKN Vandervell Limited (30 January 1981 – 9 June 1988) Federal-Mogul RPB Limited (15 January 1999 – 13 August 2001)

South East		
Location	Current company name	Former company names
Argyle House Joel Street Northwood Hills	Federal-Mogul Engineering Ltd	The Glacier Metal Company Limited (7 April 1920 – 15 January 1999)
Argyle House Joel Street Northwood Hills	Federal-Mogul Shoreham Limited	Vandervell Products Limited (8 February 1940 – 30 January 1981) Vandervell Limited (9 June 1988 – 11 February 1991) Glacier Vandervell Limited (11 February 1991 – 15 January 1999) GKN Vandervell Limited (30 January 1981 – 9 June 1988) Federal-Mogul RPB Limited (15 January 1999 – 13 August 2001)
Gwynne's Wharf Chiswick	Federal-Mogul Sealing Systems Limited	J Payen Limited (1 January 1900 – 1 January 1980) Payen International Limited (1 January 1980 – 31 March 1999)
365 Ealing Road Alperton Wembley	Federal-Mogul Engineering Limited	The Glacier Metal Company Limited (7 April 1920 – 15 January 1999)
Brantham Suffolk	Ashburton Road Services Limited	Storey Brothers and Company Limited (12 December 1902 – 1 April 1982) Storeys Industrial Products Limited (1 April 1982 – 9 March 1983
Manor Road Erith Kent	T&N Shelf Twenty Six Limited	Turners Asbestos Cement Company Limited (9 February 1942 – 1 October 1970) TAC Constructions Materials Limited (1 October 1970 – 3 November 1986) Tenmat Limited (3 November 1986 – 5 August 1997)
14 Liverpool Road Slough	Federal-Mogul Sealing Systems Ltd	J Payen Limited (1 January 1900 – 1 January 1980) Payen International Limited (1 January 1980 – 31 March 1999)
14 Liverpool Road Slough	T&N Shelf Twenty Ltd	Wood Bros. & Co. (Gaskets) Limited (16 October 1939 – 18 December 1970) Flexitallic Gaskets (Wood Bros.) Limited (18 December 1970 – 5 November 1975) Flexitallic Gaskets Limited (5 November 1975 – 11 February 1982) Flexitallic Limited (11 February 1982 - 14 April 1997)
Stirling Road Slough Trading Estate Slough	Halls Gaskets Limited	No previous names
Chertsey	Halls Gaskets Limited	No previous names
Purley Way Croydon Surrey	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)
Elstead Godalming Surrey	Federal-Mogul Camshaft Castings Ltd	Brico Metals Limited (18 February 1966 – 20 February 1978) Lydmet Limited (20 February 1978 – 31 August 1996) Weyburn-Lydmet Limited (1 September 1996 – 7 July 1998)
Broad Lane Bracknell Berkshire	AE Piston Products Limited	S. E. Opperman Limited (1 May 1964 – 1 January 1974) and (23 May 1979 – 27 February 1990) Tann-Opperman Limited (1 January 1974 – 23 May 1978) SEO Successors Limited (27 February 1990 – 2 January 1994)

South West			
Location	Current company name	Former company names	
Winterhay Lane Ilminster	Federal-Mogul Engineering Ltd	The Glacier Metal Company Limited (7 April 1920 – 15 January 1999)	
Colley Lane Bridgewater	Wellworthy Limited	Wellworthy Limited (7 June 1952 – 5 October 1981) AE Holdings Limited (5 October 1981 – 5 April 1988)	
51 Broad Street Bristol	Newalls Insulation Company Limited	Newalls Insulation and Chemical Company Limited (1 October 1964 – 10 June 1971)	

Appendix 2

Disease level	Presumptive medical and exposure criteria
i. Mesothelioma	(1) Diagnosis by an accredited respiratory specialist ¹ .
	(2) As to employees: Credible evidence of Asbestos Exposure in the course of employment by T&N or any relevant Company and such Asbestos Exposure commencing at least 10 years before first diagnosis.
	(3) In other cases: Credible evidence of Asbestos Exposure caused by the activities of T&N or any relevant company and such Asbestos Exposure commencing at least 10 years before first diagnosis.
ii. Lung Cancer	(1) Diagnosis by an accredited respiratory specialist of (a) a primary lung cancer, and (b) asbestosis or credible evidence of Asbestos Exposure sufficient to have caused asbestosis according to the Helsinki Criteria, and
	(2) As to employees: Credible evidence of Asbestos Exposure in the course of employment by T&N or any relevant Company for a minimum period of 6 months and such Asbestos Exposure commencing at least 10 years before first diagnosis.
	(3) In other cases: Credible evidence of Asbestos Exposure caused by the activities of T&N or any relevant Company for a minimum period of 6 months and such Asbestos Exposure commencing at least 10 years before first diagnosis.
iii. Asbestosis	(1) Diagnosis by an accredited respiratory specialist and assessment of disability as mild, moderate or severe according to the Scale in Schedule 2.
	(2) As to employees: Credible evidence of Asbestos Exposure in the course of employment by T&N or any relevant Company for a minimum period of 6 months and such Asbestos Exposure commencing at least 15 years before first diagnosis.
	(3) In other cases: Credible evidence of Asbestos Exposure caused by the activities of T&N or any relevant Company for a minimum period of 6 months and such Asbestos Exposure commencing at least 15 years before first diagnosis.
iv. Diffuse Pleural Thickening	(1) Diagnosis by an accredited respiratory specialist and assessment of disability as mild, moderate and severe according to the Scale in Schedule 2.
	(2) As to employees: Credible evidence of Asbestos Exposure in the course of employment by T&N or any relevant Company and such Asbestos Exposure commencing at least 15 years before first diagnosis.
	(3) In other cases: Credible evidence of Asbestos Exposure caused by the activities of T&N or any relevant Company and such Asbestos Exposure commencing at least 15 years before first diagnosis.
v. Pleural Disease Not	(1) Diagnosis by a qualified doctor based on radiological evidence, and
Causing Disability	(2) As to employees: Credible evidence of material Asbestos Exposure in the course of employment by T&N or any relevant Company and such Asbestos Exposure commencing at least 15 years before first diagnosis.
	(3) In other cases: Credible evidence of Asbestos Exposure caused by the activities of T&N or any relevant Company and such Asbestos Exposure commencing at least 15 years before first diagnosis.

¹ All references to an accredited respiratory specialist include a retired Consultant in respiratory medicine.

Appendix 3: Specific Power of Attorney and Indemnity

Note for Trust Claimants:

You must sign this Power of Attorney and Indemnity and return it to the UK Asbestos Trust with the Proof of Claim. It gives the Trust power to take all necessary and appropriate steps on your behalf in relation to your CVA Asbestos Claim. In return, you have the right to make a Trust Claim, receive any payment the Trustees determine you should be paid, and take such other steps against the Trust in respect of your Trust Claim as the UK Asbestos Trust Documents allow. The Trust will reimburse you for any costs incurred by you (including any costs awarded against you in legal proceedings brought by the Trust against T&N or any of the Companies) because of any steps taken by the Trust under this Power of Attorney.

Save where otherwise stated, capitalised words and expressions used in this Specific Power of Attorney and Indemnity shall have the same meanings as those given to them in the proposals for company voluntary arrangements pursuant to Part I of the Insolvency Act 1986 in respect of T&N Limited and certain of its subsidiaries and affiliates dated the day of 2006 (the "CVAs").

SPECIFIC POWER OF ATTORNEY

I,				
of				

("the Grantor"), appoint The T&N Asbestos Trustee Company Limited, registered in England and Wales with registered number 05548874 of 190 Strand, London, WC2R 1JN (the "Attorney") as the Attorney of the Grantor for the purposes and on the terms set out below.

- 1 The Attorney is appointed to:
- (a) take all necessary and/ or appropriate steps to assert the CVA Asbestos Claim held by the Grantor against the CVA Hercules-Protected Entity in any appropriate forum;
- (b) appoint or remove one or more substitute attorneys at such times and on such terms as the Attorney shall consider necessary or desirable including a substitute or substitutes (and so that each substitute has full power as the Grantor's attorney in accordance with the terms of his appointment);
- (c) do such acts and things and execute such deeds and documents including this Power of Attorney, together with such forms of assignment, transfer or assurance as the Attorney may from time to time be required to vest in the Attorney fully and effectively all the rights assigned by paragraph 19.3.1 and 19.3.2 of the CVAs to the Attorney, or to perfect or evidence the vesting in the Attorney of the same;
- (d) do anything else which the Attorney considers to be necessary or desirable to achieve the purposes set out above including, without limitation, the registration or recording of any document, including this Power of Attorney, with any relevant person or authority.

- 2 The Attorney shall have absolute discretion when considering and deciding what is necessary or desirable for the purpose of this Power of Attorney.
- Where the Attorney is authorised to do anything, or sign, execute and deliver any document which it considers necessary or desirable, the fact that the Attorney has done that thing or executed, signed or delivered that document, shall as between the Grantor and any person relying on this Power of Attorney be conclusive evidence that the Attorney did consider such thing or document to be necessary or desirable.
- 4 The Grantor agrees to ratify and confirm everything which the Attorney and any substitute attorney shall do or cause to be done by virtue of the powers granted by this Power of Attorney.
- 5 This Power of Attorney:
 - (a) shall be irrevocable, subject to paragraph 38.6.3 (d) (iii) of the CVAs;
 - (b) shall be governed by and construed in accordance with the laws of England and Wales.

INDEMNITY

The Attorney agrees to indemnify and keep indemnified the Grantor in relation to all liabilities, costs, charges and expenses at any time properly incurred or suffered by the Grantor solely by reason of the Attorney's exercise or purported exercise of any of the powers granted by this Specific Power of Attorney, including any costs that may be awarded against the Grantor in any legal proceedings brought by the Attorney on behalf of the Grantor.

IN WITNESS WHEREOF this Specific Power of Attorney and Indemnity has been duly executed as a Deed and delivered on the date set out below.

the Grantor is an individual:
IGNATURE:
RANTOR'S NAME:
RANTOR'S ADDRESS:
ATED:
I THE PRESENCE OF:
IGNATURE OF WITNESS:
AME OF WITNESS:
DDRESS OF WITNESS:
ATED:

If the Grantor is a company, this Specific Power of Attorney and Indemnity should be executed in accordance with the Company's Articles.

Appendix 4

You must enclose with this proof of claim form:

- Medical Evidence: please refer to Appendix 2 of this form for details of what needs to be provided. This depends on the disease suffered by the Injured Person.
- Exposure Evidence: please refer to Appendix 2 of this form for details of what needs to be provided. This depends on the disease suffered by the Injured Person.
- Power of Attorney: all Trust Claimants must provide a signed power of attorney in the form that appears at Appendix 3.
- Where a Trust Claim is lodged by a living Injured Person in respect of Disease Levels I and II and the Trust Claimant wishes to claim the whole award, a deed of confirmation that he has no Dependants or Relatives or any person who is akin to a Dependant or Relative under equivalent legislation, or a deed of confirmation from his Dependants or Relatives or any such persons that they will not bring any claims pursuant to the Statutes on the death of the Injured Person. If this document is not provided, this will reduce the amount payable to the Injured Person now see Clause 2.9.3 of the EL Scheme TDP and Clause 2.9.3 the UK Asbestos Trust TDP.
- Where a Trust Claim is lodged in respect of a deceased Injured Person, and the Trust Claim will exceed £10,000, a copy of the Grant of Probate or equivalent document appointing a Personal Representative.
- Where the Trust Claimant has issued proceedings against T&N Limited or one of the other Companies and wishes to claim the issue fee: a copy of the Claim Form showing the issue fee paid.
- HM Revenue and Customs employment history this is available by contacting the Inland Revenue: National Contributions Office SSA BP1002A, Benham Park View, Newcastle upon Tyne, NE98 1ZZ (telephone 0845 9156108).