

DISTRICT COURT OF THE UNITED STATES
DISTRICT OF MINNESOTA
THIRD DIVISION

PLAINTIFF'S
EXHIBIT

GF-651

Karl R. Busse,

Plaintiff,

vs.

Civ. No. 3-77-347

Johns-Manville Products
Corp., et al,

Defendants.

DEFENDANT RUBEROID
COMPANY A/K/A GAF
CORPORATION'S ANSWERS
TO PLAINTIFF'S
INTERROGATORIES

Defendant Ruberoid Company, a/k/a GAF Corporation, for its
answers to Plaintiffs Interrogatories, states as follows:

INTERROGATORY NO. 1:

Give the generic names and trade names of all
types of insulating materials manufactured by you, giving
the dates that you began to manufacture such materials, start-
ing in 1936, a description of the materials and what they
contain.

ANSWER:

"Calsilite" - A high temperature pipe covering
and built-up block containing approximately 10%
amosite and 2% chrysotile asbestos fiber and the
remainder consisting of hydrous lime silicate
and diatomaceous earth. Calsilite was manufactured
at Gloucester, New Jersey from the early 1940's
until mid-1970 at which time GAF commenced the
production of asbestos-free Calsilite ("Calsilite
II").
"115" and "214" Insulation Cements - Known generically
as 7M and 7K type cements, respectively, these
insulating cements were composed entirely of chrysotile
asbestos fiber. These cements were manufactured
at Hyde Park, Vermont from 1936 through September,
1975.

1 "T/NA-100" Insulation Jacketing - A two-ply, laminated
2 product consisting of a layer of asbestos paper
3 in which chrysotile asbestos fibers were bonded
4 with Neoprene and a layer of polyvinyl fluoride
5 (Tedlar) plastic film attached by adhesive on
6 one side. T/NA-100 was manufactured at South
7 Bound Brook, New Jersey from 1962 to September,
8 1971.

9 Asbestos Paper and Millboard - Chrysotile insulating
10 paper, used as a jacketing or pipe wrap; manufactured
11 at Erie, Pennsylvania from approximately 1928.
12 Millboard was used primarily as an industrial
13 fire barrier. Its present uses are limited primarily
14 to the manufacturing of gaskets and insulating
15 components used in consumer products.

16 INTERROGATORY NO. 2:

17 Did you ever at any time give warnings to workers
18 of the dangerous nature of your products? If so, describe
19 your warnings, give the dates such warnings were issued and
 to whom such warnings were given and how they were published
 or made known.

20 ANSWER:

21 In late 1965 or early 1966, Ruberoid began placing
22 the following warning on packages of its industrial thermal
23 insulation products containing asbestos fiber:

24 CAUTION

25 THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION
26 OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF
 TIME MAY BE HARMFUL.

27 IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED,
28 AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL
 IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U.S. BUREAU
 OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

29 _____
30 XXX

31 XXX

32 XXX

1 In 1970, this warning label was changed to read as follows:

2 CAUTION

3 CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE
4 QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID
5 BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE,
WEAR RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR
PNEUMOCONIOSIS PRODUCING DUST.

6
7 In approximately 1972, this warning was further changed to
read as follows:

8 CAUTION

9 CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE
10 QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL. AVOID
BREATHING DUST.

11 INTERROGATORY NO. 3:

12 What studies have you made to determine the effect
13 of your product on the lungs and physical condition of persons
14 employed as insulators and asbestos workers who use your
products?

15 ANSWER:

16 GAF has no facilities or equipment designed for
17 medical or technical research and therefore conducted no
18 studies of the nature specified.

19 INTERROGATORY NO. 4:

20 Who made such studies, when were they made, and
attach copies of the reports of such studies.

21 ANSWER:

22 See Answer to Interrogatory No. 3.

23 INTERROGATORY NO. 5:

24 Did you package and sell products containing asbestos
25 from the years 1951 to 1971? If so, how were the products
26 sold, how were the products packaged, and were these products
universally used throughout the United States?

27 ANSWER:

28 Most Ruberoid and GAF industrial thermal insulation
29 products were sold in corrugated cardboard boxes bearing
30 the companies' respective names or "logos." The insulating
31 cement was sold in heavy-duty bags. GAF does not know whether
32 its products were "universally used throughout the United

1 States." GAF objects to the remainder of Interrogatory No.
2 5 on the ground that the question "how were these products
3 sold" is ambiguous.

4 INTERROGATORY NO. 6:

5 If these products were used primarily in any specific
6 location or area, state where such products were primarily
used.

7 ANSWER:

8 See Answer to Interrogatory No. 5.

9 INTERROGATORY NO. 7:

10 Do you recognize that prolonged use of the insulat-
11 ing materials manufactured by you can cause or contribute
to cause various occupational diseases, including asbestosis,
12 silicosis, emphysema and dermatitis?

13 ANSWER:

14 GAF objects to this Interrogatory on the ground
15 that it is argumentative and calls for an expert medical
16 opinion.

17 INTERROGATORY NO. 8:

18 Has your company done any studies or has your
company ordered any studies by others concerning the effects
19 of inhalation of asbestos dust or fibers by one using or
being exposed to any of the asbestos materials manufactured
20 by your company? In answer to this question, please give
the date and nature of such studies, if any, the name or
names of the persons conducting the studies and their address,
21 what the purpose of the studies were, and attach a copy of
any report based upon such studies, showing to whom such
22 report was given and when.

23 ANSWER:

24 GAF has no facilities or equipment designed for
25 medical or technical research and therefore conducted no
26 studies of the nature specified.

27 INTERROGATORY NO. 9:

28 Have you or any of your employees conducted studies
designed to prevent, minimize or eliminate the inhalation
29 of asbestos dust and fibers by those exposed to the use of
your company's products? If so, give the name or names of
30 such persons conducting such studies, attach copies of such
studies, by whom they were made, and to whom they were given,
31 and when, and state what action, if any, was taken based
upon such studies in an effort to prevent, minimize or eliminate
32 the effects of inhalation of asbestos dust or fibers upon

1 those using or being exposed to the dust and fibers contained
2 in such products as manufactured by your company.

3 ANSWER:

4 See Answer to Interrogatory No. 8.

5 INTERROGATORY NO. 10:

6 Do you or your company have any inspection of
7 areas where workers are using products manufactured by your
8 company containing asbestos as to the dust count? If you
9 do not, then please explain why this is not done, and if
10 you do, please explain what action, if any, is taken by your
11 company following the taking of dust counts at any of the
12 locations referred to above. Also please give the dates
13 and places, if any, that your company first started making
14 such dust count, and set forth in detail the dates and places
15 this has been done since.

16 ANSWER:

17 GAF objects to this Interrogatory on the ground
18 that it is irrelevant.

19 INTERROGATORY NO. 11:

20 Does your company recognize that as early as the
21 year 1900 Dr. H. Montague Murray, a physician in London's
22 Charing Cross Hospital, found spicules of asbestos in the
23 lung tissue? If you agree with this, then state what action,
24 if any, your company has taken since 1900 to prevent, reduce
25 or eliminate the dangers to those using your asbestos products
26 from inhaling the dust and fibers.

27 ANSWER:

28 GAF recognizes the name of Dr. Murray but has
29 no first hand familiarity with or knowledge of his works.

30 INTERROGATORY NO. 12:

31 Does your company recognize that in 1924, Dr. W. E.
32 Cook, also of England, found clear evidence of asbestosis
and that such discovery was published in the British Medical
Journal of July 26, 1924, and re-published in 1927? If you
do, then please state what action, if any, was taken by your
company based upon these studies to prevent, reduce or eliminate
asbestosis in those using your products. If your answer
is that you do not recognize the truth of such statement,
then please state what your company has done in an effort
to keep abreast of medical literature concerning the disease
produced from the products which you manufacture, if in truth
you have.

XXX

XXX

XXX

1 ANSWER:

2 GAF recognizes the name of Dr. Cook but has no
3 first hand familiarity with or knowledge of his works.

4 INTERROGATORY NO. 13:

5 Does your company recognize that in 1931, the
6 English Parliament passed legislation making asbestosis a
7 compensable disease and requesting improved methods of exhaust
8 ventilation and dust suppression in asbestos-textile factories,
9 and also institutes periodical medical examinations for workers
10 engaged in particularly dusty processes in the asbestos-textile
11 industry? If you do recognize the truth of the statement
12 above, please state what action, if any, your company took
13 in response to such knowledge in an effort to prevent, reduce
14 or eliminate the effects of asbestos in those using your
15 products. If you do not recognize the truth of such statement,
16 then please state why your company did not keep in touch
17 with legislation and programs adopted endeavoring to reduce
18 or eliminate the disease of asbestosis in those using asbestos
19 products.

13 ANSWER:

14 GAF objects to this Interrogatory on the grounds
15 that it calls for an expert legal opinion regarding English
16 law.

17 INTERROGATORY NO. 14:

18 Do you agree that once asbestos fibers or dust
19 are inhaled into the lungs, there is no way to eliminate
20 such dust or fibers from the lungs for the balance of such
21 person's life?

21 ANSWER:

22 GAF objects to this Interrogatory on the ground
23 that it is argumentative and calls for an expert medical
24 opinion.

25 INTERROGATORY NO. 15:

26 What technique, if any, does your company use
27 to make dust samplings, explaining the technique and when
28 it was commenced and what the purpose was and what action
29 has been taken in response to the findings as to the dust
30 samples.

29 ANSWER:

30 None.

31 XXX

32 XXX

1 INTERROGATORY NO. 16:

2 Does your company recognize that asbestos causes
3 induced lung cancer? If your answer is "Yes", when did you
4 come to such realization and what action did you take in
5 response thereto? If your answer is "No" then please explain
6 why no studies were made by your company to ascertain that
7 this fact was indeed true and thereafter to take action to
8 advise those exposed to your products of their dangerous
9 nature.

10 ANSWER:

11 GAF objects to this Interrogatory on the ground
12 that it is argumentative and calls for an expert medical
13 opinion.
14

15 INTERROGATORY NO. 17:

16 Does your company recognize there is a direct
17 connection between the inhalation of asbestos dust and fibers
18 and the disease mesothelioma? If your answer is "Yes" to
19 this question, then please advise what notices were given
20 to those exposed to your asbestos products of this fact,
21 the dates of such notices and the methods of dissemination
22 or publication of same.

23 ANSWER:

24 GAF objects to this Interrogatory on the ground
25 that it is argumentative and calls for an expert medical
26 opinion.
27

28 INTERROGATORY NO. 18:

29 Does your company place any warning signs on its
30 asbestos products? If so, please state exactly what the
31 warning is, where it is used and when its use was first begun.
32 If your answer to this question is "Yes" then please explain
why your company uses such warning notices.

ANSWER:

 See Answer to Interrogatory No. 2. These warnings
were used/are used to warn users of GAF products of the potential
health hazards from the inhalation of ambient asbestos fiber.

INTERROGATORY NO. 19:

 Do you agree that asbestos has been directly associated
medically with the disease of cor pulmonale?

XXX

XXX

XXX

1 ANSWER:

2 GAF objects to this Interrogatory on the ground
3 that it seeks an expert medical opinion.

4 INTERROGATORY NO. 20:

5 Does your company recognize that the physical
6 characteristics of and chemical properties of asbestos fibers
7 persist unimpaired beyond the longevity of humans? In other
8 words, unlike some dangerous products, it does not eventually
9 dissipate or reduce itself in danger to those who might be
10 exposed to it?

11 ANSWER:

12 GAF objects to this Interrogatory on the ground
13 that it seeks an expert medical opinion.

14 INTERROGATORY NO. 21:

15 Does your company recognize that year-by-year,
16 more asbestos is used in the United States, and therefore
17 the public is thereby exposed to a greater and greater extent
18 to the inhalation of asbestos dust and fiber? If your answer
19 is "Yes" then please state what action your company has taken
20 to prevent, reduce or eliminate this danger and what action,
21 if any, you have taken to notify the public at large of this
22 danger.

23 ANSWER:

24 See Answer to Interrogatory No. 2.

25 INTERROGATORY NO. 22:

26 Has your company consulted with Dr. Irving J.
27 Selikoff, of New York, concerning asbestosis, and if so,
28 please state when and under what circumstances and what informa-
29 tion, if any, was furnished by your company to him, giving
30 dates of such information.

31 ANSWER:

32 Certain GAF employees have heard Dr. Selikoff
speak about certain potential health problems relating to
the installation of industrial thermal insulation.

INTERROGATORY NO. 23:

Does your company contribute any funds to research
concerning asbestos and its relation to lung, heart and larynx
disease? If so, please state the amount of money contributed,
when and to whom, attaching any report or reports from such
individual or organization to whom your funds were contributed.

ANSWER:

GAF has made no direct contributions.

1 INTERROGATORY NO. 24:

2 Do you have any labor inspectors or anyone from
3 your company whose job it is to go to areas where your products
4 are being used to make a dust level count, and if so, please
5 state when your company started such procedure, the purpose
6 of it, and what action, if any, was taken in response to
7 your findings.

8 ANSWER:

9 GAF objects to this Interrogatory on the ground
10 that it is irrelevant. GAF no longer makes asbestos products.

11 INTERROGATORY NO. 25:

12 Is your company familiar with the hearing conducted
13 in March, 1967, before the House of Representatives of the
14 United States Congress Sub-Committee on Labor?

15 ANSWER:

16 GAF has no first hand knowledge of the hearing
17 referenced in this Interrogatory.

18 INTERROGATORY NO. 26:

19 Do you agree that the problem of asbestos dust
20 extends further than to those men handling your products
21 but that the exposure is shared with other construction workers
22 using same as well?

23 ANSWER:

24 GAF objects to this Interrogatory on the ground
25 that it is ambiguous.

26 INTERROGATORY NO. 27:

27 If your answer to the preceding Interrogatory
28 No. 26 is "No", then please state whether or not you have
29 familiarized yourself with the testimony of Dr. William H.
30 Stew Surgeon-General of the United States before the Committee
31 mentioned above that probably three and one-half million
32 construction workers are being exposed to asbestos dust in
33 addition to those workers actually handling the materials
34 containing asbestos?

35 ANSWER:

36 Not applicable.

37 INTERROGATORY NO. 28:

38 Do you recognize or agree that the problems of
39 air laden with asbestos dust is so great that possibly millions
40 of people in the United States are being exposed to the inhala-
41 tion of asbestos dust who have nothing to do with its use
42 or application? If your answer is "Yes", then please advise
43 what action your company has taken, if any, to advise the

general public of the dangerous nature of asbestos and what steps have been taken to endeavor to protect the general public from the dangerous effects of the inhalation of the asbestos dust and fibers, when such action was taken, and what it consists of.

ANSWER:

GAF objects to this Interrogatory on the ground that it is argumentative.

INTERROGATORY NO. 29:

Is it possible with all of your products containing asbestos to distinguish your products from those manufactured by a competitor? If your answer is "Yes" please describe how you contend your products in all instances can be distinguished from that of a competitor, ie, merely by names or package or by appearance of the products themselves. If there are products which cannot be, in your opinion, distinguished from products of a similar kind manufactured by a competitor, please state the name of such product, who manufactures it, as well as the trade name of the product manufactured by your competitor.

ANSWER:

It is sometimes possible to distinguish GAF products from others by packaging, color, or texture. However, GAF does not have access to other's products by which to make a comparison.

INTERROGATORY NO. 30:

It is true, is it not, that most of the products manufactured by your company containing asbestos will in most instances have to be cut, sawed, scribed, shaped or mixed by the ultimate user and his employees?

ANSWER:

GAF objects to this Interrogatory on the grounds that it is argumentative and ambiguous as to the word "most" and irrelevant as to "non-thermal insulation products".

INTERROGATORY NO. 31:

Please give the state of incorporation of your company, the date it was organized, and the domicile of your company at this time and all states and countries where your product is used.

ANSWER:

GAF is a Delaware Corporation which was organized in 1929. Its principal place of business is in New York

1 City. GAF objects to the rest of Interrogatory No. 31 on
2 the grounds that it is ambiguous as to the word product and
3 irrelevant as to any state or country in which plaintiff
4 did not work.

5 INTERROGATORY NO. 32:

6 How many years has your company been engaged in
7 the manufacture of products containing asbestos and which
are commonly used by insulators and asbestos workers?

8 ANSWER:

9 Approximately 40 years.

10 INTERROGATORY NO. 33:

11 If you, your company, or your company's attorneys,
12 contend that any respirators or other breathing device is
13 currently on the market that will prevent the inhalation
14 of asbestos dust and fibers, give the detailed description
15 of such respirator or other breathing device, together with
16 how you know this will prevent the inhalation of such dust
and fibers, what tests were conducted, by whom and where,
with sufficient detail to enable us to obtain the results
of such tests, also the dates when said respirators were
first marketed.

17 ANSWER:

18 GAF objects to this Interrogatory on the ground
19 that it is argumentative and calls for expert medical and
20 scientific opinions.

21 INTERROGATORY NO. 34:

22 It is true, is it not, that your company has for
23 many years manufactured insulating materials containing asbestos
and that such products have been placed upon the open market
to be purchased and used by the public?

24 ANSWER:

25 GAF no longer manufactures the products in question.

26 GAF objects to this Interrogatory on the ground that it is
27 ambiguous in its use of the phrase "the public".

28 INTERROGATORY NO. 35:

29 Do you or your company recognize that such asbestos
30 insulating materials are dangerous and harmful to human beings
31 and to the health of man? If your answer to this question
32 is "Yes", then please explain when you came to this conclusion
and what, if anything, you have done about it to notify the
public. If your answer is that your products are not harmful
then explain what tests were made upon which you base such
conclusion.

1 ANSWER:

2 GAF objects to this Interrogatory on the ground
3 that it is argumentative and calls for an expert medical
4 opinion.

5 INTERROGATORY NO. 36:

6 Please state whether or not your company has had
7 knowledge of any deaths or serious lung disease among your
8 employees which has been attributed to the inhalation of
9 asbestos dust or fibers. If so, please give the number,
10 the name where known, and address of such persons, together
11 with the names and address of the doctors who administered
12 treatment to such persons, if known, and reports of occupational
13 diseases furnished Industrial Commission of the states and
14 attach copies of the latter.

15 ANSWER:

16 GAF did not employ persons in a capacity similar
17 to that of plaintiff. Thus GAF objects to this Interrogatory
18 on the ground that the information sought is irrelevant to
19 the subject matter of the instant action and not reasonably
20 calculated to lead to the discovery of admissible evidence.

21 INTERROGATORY NO. 37:

22 Assume for the purpose of this question that it
23 has been known for many years that asbestos dust and fibers
24 have been dangerous to human beings: has your company done
25 anything prior to 1969 to notify any segment of the American
26 population of such danger? If so, explain in detail just
27 what you did, and give the dates.

28 ANSWER:

29 See answer to Interrogatory No. 2.

30 INTERROGATORY NO. 38:

31 If your company manufactures any insulating products
32 which are commonly used by insulators and which contain asbestos,
33 please describe how the following products are cut, shaped,
34 mixed and applied on the jobs:

- 35 (1) Asbestos cement;
36 (2) Asbestos pipe covering;
37 (3) Asbestos bricks or blocks;
38 (4) Asbestos sheeting;
39 (5) Asbestos insulation used to cover extremes
40 of heat as well as cold.
41 (6) Asbestos insulation in loose form which may
42 be blown into homes or buildings;
43 (7) Asbestos in spray form,

44 XXX

1 giving particular reference as to whether or not the materials
2 have to be sawed or cut on the job, blown into confined areas,
3 or mixed with water into a cement or paste. Then please
4 state if there is any way known to you that the above products
5 can be used and applied without the worker inhaling any of
6 the asbestos dust or fibers.

7 ANSWER:

8 1.) Asbestos cement--mixed with water and sometimes
9 cement. Applied with a trowel.

10 2.) Asbestos pipe covering--applied directly
11 to pipe, usually with a metal band. Cut to size where necessary.

12 3.) Asbestos brick or blocks--similar to building
13 bricks, but using high temperature resistant adhesive.

14 4.) Asbestos Sheeting--GAF cannot answer without
15 clarification from the plaintiff as to what the term "Asbestos
16 Sheeting" refers to.

17 5.) Asbestos insulation used to cover extremes
18 of heat and cold--GAF cannot answer without clarification
19 as to what plaintiff means.

20 6.) Asbestos insulation in loose form--unknown.

21 7.) Asbestos in spray form--unknown.

22 GAF suggests that proper ventilation and respirators
23 be used at all times.

24 INTERROGATORY NO. 39:

25 Do you have any statistical figures available
26 showing the number of employees employed with your company
27 who are exposed to asbestos dust and fibers and who have
28 worked for your company twenty years or longer who have lung
29 disease? If so, please give such figures.

30 ANSWER:

31 GAF knows of none.

32 INTERROGATORY NO. 40:

Do you have any information derived from medical
experiments or other sources or information of your own know-
ledge, concerning the most common cause of death of one having
asbestosis, if so, please describe what the most frequent
cause of death from one suffering from such disease is.

XXX

1 ANSWER:

2 No, except to the extent obtained in pre-trial
3 discovery in other asbestosis actions.

4 INTERROGATORY NO. 41:

5 State:

6 (a) The net profit made by your company for each
7 of the years since and including the year
8 1936.

9 (b) The net worth of your company as of the end
10 of your annual accounting period for each
11 of the years since 1936.

12 (c) The total dollar volume of sales of products
13 manufactured by your company and include,
14 if possible, the total amount of sales of
15 products of your company containing asbestos
16 for each of the years since 1936.

17 ANSWER:

18 (a) GAF objects to this Interrogatory on the
19 ground that it is irrelevant.

20 (b) GAF objects to this Interrogatory on the
21 ground that it is irrelevant.

22 (c) GAF objects to this Interrogatory on the
23 ground that it is irrelevant except to the extent that sales
24 of thermal insulation might be available.

25 INTERROGATORY NO. 42:

26 Please give the name and address of the president
27 of your company, and also the name and address of the Chairman
28 of the Board of Directors.

29 ANSWER:

30 Dr. Jesse Werner, Chairman of the Board and Chief
31 Executive Officer

32 c/o GAF Corporation

 140 West 51st Street

 New York, New York 10020

INTERROGATORY NO. 43:

 If your company has been unable to answer any
 of the foregoing interrogatories herein propounded, please
 state the name and address of the person in your company

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ANSWER:

GAF objects to this Interrogatory on the ground that it is argumentative and seeks a legal conclusion.

INTERROGATORY NO. 46:

Does your company recognize that asbestos causes asbestosis? If the answer is "Yes", when did you come to such realization and what action did you take in response thereto? If your answer is "No", then please explain why no studies were made by your company to ascertain that this fact was indeed true and thereafter to take action to advise those exposed to your products of their dangerous nature.

ANSWER:

GAF recognizes that this sometimes happens under certain circumstances. GAF realized this approximately in 1964. See Answer to Interrogatory No. 2.

1 STATE OF NEW YORK)
2) ss.
3 COUNTY OF NEW YORK)

4 MARY JANE ROTH, being duly sworn according to law, deposes
5 and says that she is an Assistant Secretary of defendant
6 GAF Corporation; that she is duly authorized to make this
7 affidavit on behalf of said corporation; and that all of
8 the statements set forth in the foregoing Answers to Plaintiff's
9 Interrogatories are true and correct to the best of her knowledge,
10 information and belief.

Mary Jane Roth

11 Sworn to and subscribed
12 before me this 2nd day
13 of October, 1979.

Mary J. Seelmer

14 MARY J. SEELMER
15 Notary Public, State of New York
16 No. 60-457501
17 Qualified in Westchester County
18 Certificate filed in New York
19 Commission Expires 12/31/81

Mark P. Wine
Mark P. Wine
Attorney for Defendant
GAF Corporation
Oppenheimer, Wolff, Foster,
Shepard and Donnelly
4824 IDS Center
Minneapolis, Minnesota 55402

OPPENHEIMER,
WOLFF, FOSTER,
SHEPARD AND
DONNELLY
ATTORNEYS AT LAW
4824 IDS CENTER
MINNEAPOLIS, MINN.
55402
(612) 338-1000