J. CARLISLE DEHAY, JR.
(1922 - 1991)

GARY D. ELLISTON
DAVID W. CROWE
MEL D. BAILEY
GREGORY H. BEVEL

WRITER'S DIRECT DIAL NUMBER
(214) 953-6432

DEHAY & ELLISTON, L.L.P.

ATTORNEYS AND COUNSELORS
1500 MAXUS ENERGY TOWER
717 NORTH HARWOOD STREET
DALLAS, TEXAS 75201-6508
(214) 953-5454
FACSIMILE (214) 953-5455

215 ORLEANS ST.
BEAUMONT, TEXAS 77701
(409) 833-0900
FACSIMILE (409) 833-0864

CONSTANCE R. ARIAGNO
MICHAEL L. ATCHLEY
STUART G. BROOKS
KELLY C. CAPERTON
RANDAL G. CASHIOLA
SHELLY L. COOK
MICHELLE O.W. EDENS
PAUL E. HAMILTON
BRENT M. KARREN
LAURA E. KUGLER
CHRISTOPHER P. MANNING
ANTHONY S. MILLER
ERIC D. WEWERS



November 21, 1995

VIA FACSIMILE/ORIGINAL VIA U.S. MAIL

Karen Gammon, Esq.
Baron & Budd, P.C.
3102 Oak Lawn, Suite 1100
Dallas, TX 75219

Re: Rule 11 Agreement

Dear Karen:

Please allow this letter to memorialize our Rule Agreement regarding the authentication of Georgia-Pacific Exhibits. I have been authorized to enter into this Rule 11 Agreement between Georgia-Pacific Corporation and the law firm of Baron & Budd regarding objections to certain documents offered against Georgia-Pacific Corporation by the law firm of Baron & Budd.

Georgia-Pacific agrees not to raise any authentication objections to the documents pre-marked and identified as Plaintiff Exhibits G-P 1 through G-P 152 with the exception of Plaintiff's Exhibit G-P 91 and G-P 93. A copy of the Baron & Budd Exhibit list governing this agreement will be attached to this letter and filed with the appropriate Courts in accordance with Rule 11.

In exchange for this agreement, your law firm has agreed to withdraw its notice for the deposition of a corporate representative of Georgia-Pacific Corporation which is presently scheduled for November 22, 1995.

Please execute this agreement and return it to me immediately so that I may file it with the appropriate Courts in accordance with the rules.

Very truly yours,

Mel D. Bailey

AGREED AS TO FORM AND CONTENT:

BARON & BUDD, P.C.

By: _____
KAREN GAMMON

Attorney For Plaintiffs

PLAINTIFFS' EXHIBITS TO BE AUTHENTICATED
GEORGIA-PACIFIC CORPORATION

EXHIBIT NUMBER	DESCRIPTION
GP- 1	Letter to J.A. Marian from R. Sikes, October 23, 1964.
GP- 2	Minutes of the Safety Committee Meeting, Marriott Motor Hotel, Saddle Brook, New Jersey, Sept. 19, 1967.
GP- 3	Georgia Pacific purchase order number G-09692 indicating order for 1,080 - 100 pound bags of asbestos December, 1969.
GP- 4	Memo dated June 3, 1970 to M.F. Fink from E.F. Fatz re: lung research.
GP- 5	Georgia Pacific letter to Fred Rogers from M.F. Fink dated June 9, 1970
GP- 6	Letter from Albert M. Fay, National Gypsum Company, to William Hunt, Georgia Pacific Corporation, dated September 15, 1971.
GP- 7	Letter from Albert M. Fay, National Gypsum Company, to William Hunt, Georgia Pacific Corporation, dated September 24, 1971.
GP- 8	Standard for Exposure to Asbestos Dust. Federal Register, Vol. 37, No. 110. Wednesday, June 7, 1972.
GP- 9	Texas State Department of Health letter dated September 22, 1972 to K. W. Brown with attached: Industrial Hygiene Survey, Georgia Pacific Corporation Gypsum Division - Acme Plant, Quanah, Texas, September 22, 1972.
GP- 10	Page 3 of report dated September 22, 1972 with handwritten notations.
GP- 11	Interdepartmental memo to E.B. Hollingsworth from J.D. Rauch, dated October 27, 1972.
GP- 12	State of New York Department of Labor Notice of Violation and Order to Comply dated 10/27/72.
GP- 13	Interdepartmental communication to T.W. Richards and E.B. Hollingsworth from E.D. O'Neill, November 1, 1972.

GP- 14 Letter from I.A. Hoekstra attention Vince J. Tretter, Jr. November 27, 1972.

GP- 15 U.S. Department of Labor OSHA Region 10 letter to employers using asbestos January 22, 1973 together with 7 page package of selected materials oriented toward the employers' role in developing an asbestos control program with Georgia Pacific route slip on first page indicating no action to be taken until further notice.

GP- 16 Interdepartmental communication from M.F. Fink, February 8, 1973.

GP- 17 Interdepartmental communication to E.B. Hollingsworth from J.D. Rauch, dated February 9, 1973 (2 pages).

GP- 18 Minutes of the Ninetieth Meeting of the Technical Committee of the Gypsum Association. February 14, 15, 16, 1973.

GP- 19 Letter to V.J. Tretter from Arthur Hoekstra, March 19, 1973.

GP- 20 New York State Department of Environmental Conservation Air Resources Management Program report of March 26, 1973 noting annual usage of asbestos for 1972 was 2,500,000 pounds and as processed at 360 pounds an hour with an emission rate potential of 5.4 pounds per hour.

GP- 21 Memo from C.W. Lehnert, Caution Label for Joint Compounds Containing Asbestos, April 11, 1973 (2 pages).

GP- 22 Georgia Pacific interdepartmental communication to E.B.Hollingsworth from J.D. Rauch, re: Asbestos Hazard Control Akron Joint System Plant, dated April 26, 1973.

GP- 23 Letter to George Turner, Project Engineer at Georgia Pacific from Earland E. Harvey, P.E., dated May 12, 1973.

GP- 24 Citation for Serious Violation, June 13, 1973.

GP- 25 Georgia Pacific interdepartmental communication to E.B. Hollingsworth from J.D. Rauch, re: OSHA INSPECTION - Akron, N.Y. Plant, dated June 18, 1973.

EXHIBIT NUMBER	DESCRIPTION
GP- 26	Georgia Pacific interdepartmental communication to John Woodsmall from C.W. Lehnert, re: Asbestos Fiber in Joint Compounds, dated June 19, 1973.
GP- 27	Georgia Pacific interdepartmental communication to J.D. Rauch from G.E. Wilson, re: OSHA Inspection, dated June 19, 1973.
GP- 28	U.S. Gypsum memo to J.N. Walker from K.S. Freeman, re: Caution Labels for Joint Compounds, dated August 17, 1973.
GP- 29	"Evaluation of Exposure to Siliceous Dust During Mixing and Sanding of Joint Compounds" Gypsum Association, Denver, Colorado, September 11-13, 1973.
GP- 30	Minutes of the Semiannual Meeting, The Homestead, Hot Springs, Virginia, October 10-12, 1973; with attachment: Report of Special Task Force on Joint Treatment Compound.
GP- 31	Georgia Pacific purchase order number G-06949 dated 11-14-73 indicating order for 1,020 - 100 pound bags of asbestos.
GP- 32	"Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds," Gypsum Association, Denver, Colorado, November 19, 1973.
GP- 33	Purchase order number G-07687 noting receipt of purchase of asbestos received 5/4/74.
GP- 34	Georgia Pacific intracompany memo to G.E. Wilson from O.E. Burch, re: Asbestos - JT Cement Products, dated May 17, 1974, with attachment: "Asbestos Danger Cited", Walls and Ceilings Magazine, May, 1974.
GP- 35	Georgia Pacific Corporation intercompany memo from J.R. Hurd to W.A. Nalbone dated June 7, 1974, relating to "Asbestos Caution Labels".
GP- 36	Georgia Pacific purchase order number G-08322 noting date of receipt of 8/21/74 purchases of asbestos.

EXHIBIT NUMBER	DESCRIPTION
GP- 37	Georgia Pacific purchase order number G-08933 noting date of receipt of 2/17/75 purchases of asbestos.
GP- 38	Georgia Pacific Intracompany Memo to E.B. Hollingsworth from D.C. Corkill, re: Asbestos Free Ready-Mix, dated August 21, 1975.
GP- 39	Article copied on Pacific letterhead, entitled "Spackling may harbor dangerous asbestos level", The Evening Times, Trenton, N.J., Friday, August 29, 1975, "xxc: Chet Smalley, Dave Corkill, Bill Lehnert".
GP- 40	Georgia Pacific intracompany memo to C.W. Lehnert from E.L. Aasen, re: Asbestos Status Report, dated October 2, 1975.
GP- 41	Intracompany memo to J.R. Hurd from D.C. Corkill, October 15, 1975.
GP- 42	Intracompany memo to D.C. Corkill from O.E. Burch, October 16, 1975.
GP- 43	Memo to D.C. Corkill from J.R. Hurd, October 17, 1975 with attachment: Federal Register, Vol. 40, No. 197, pp. 47652-47665, Thursday, October 9, 1975.
GP- 44	Intracompany memo from G.E Wilson, subject: Asbestos, October 23, 1975.
GP- 45	Georgia Pacific intracompany memo from G.W. Green re: Proposed Rule Changes - Occupational Exposure to Asbestos, dated October 24, 1975.
GP- 46	Citation dated November 12, 1975.
GP- 47	Georgia Pacific purchase order G-11301 indicating purchase of 100,000 pounds of asbestos, arrival date 1976.
GP- 48	Marietta Georgia Plant Formula Ready Mix Filler M-973 dated 1-13-76.
GP- 49	George A. Rowley & Company bill memo #3566 order date 1/19/76 indicating 81,600 pounds of asbestos purchased shipped from Canadian mines.

EXHIBIT NUMBER	DESCRIPTION
GP- 50	Chicago Illinois Plant Formula Topping Compound C-936, May 10, 1976.
GP- 51	Georgia Pacific purchase order G-11486 dated 9/23/76 indicating 81,600 pounds asbestos purchased.
GP- 52	George A. Rowley & Co. bill memo #3403 order dated 9/23/76 indicating 81,600 pounds of asbestos shipped from Canadian mines.
GP- 53	Georgia Pacific purchase order G-00005 indicating purchase of 81,600 pounds of asbestos dated 11/19/76.
GP- 54	Chicago Illinois Plant Formula Ready Mix Filler M-973, December 1, 1976.
GP- 55	Chicago Illinois Plant Formula Ready Mix Filler M-973 dated January 10, 1977.
GP- 56	Intracompany memo from M.A. Palmowski to C.W. Lehnert, January 12, 1977.
GP- 57	Letter to Georgia Pacific from Craig Burningham dated January 14, 1977.
GP- 58	Intracompany memo from D.C. Felty to C.W. Lehnert, January 20, 1977.
GP- 59	Letter to Craig Burningham from O.E. Burch, Georgia Pacific Corporation, General Sales Manager, dated January 21, 1977.
GP- 60	Letter to Georgia Pacific, attention Bill Gettel from David P. Leet at Windsor Minerals, Inc., dated February 3, 1977 with attached article entitled "Asbestos: Still Some Problems:
GP- 61	Georgia Pacific Intracompany memo to C.W. Lehnert from D.C. Felty, re: Ready Mix Figures, dated February 8, 1977.

EXHIBIT NUMBER	DESCRIPTION
GP- 62	Copies of Georgia Pacific Route Slips dated February 9, 1977 and February 14, 1977 attached to: State of New Jersey Department of Environmental Protection Proposed Regulation: Notice of Public Hearing, Docket No. DEP-001-77-01, dated January 12, 1977.
GP- 63	Georgia Pacific intracompany memo to branch managers from G.F. Baitinger, February 11, 1977.
GP- 64	Telex to I.F. Weibel, M.A. Palmowski, R.V. Favero and H.W. Scharf from E.B. Hollingsworth, dated March, 1977.
GP- 65	Georgia Pacific purchase order G-00535 shipping date requested 3/1/77 indicating purchase of 50,000 pounds of asbestos.
GP- 66	Intracompany memo to C.W. Lehnert from D.C. Corkill, March 3, 1977.
GP- 67	Georgia Pacific purchase order G-00646 dated 3/9/77 indicating 50,000 pounds of asbestos purchased.
GP- 68	Georgia Pacific intracompany memo to C.E. Lehnert from D.C. Corkill, March 10, 1977.
GP- 69	Georgia Pacific purchase order G-00499 indicating date received 3/15/77.
GP- 70	Georgia Pacific purchase order G-00699 date written 3/28/77 indicating purchase of 100,000 pounds of asbestos.
GP- 71	Georgia Pacific purchase order G-08700 date written 3/28/77 purchase of 100,000 pounds of asbestos.
GP- 72	Bill from George A. Rowley & Co. order date 3/29/77 indicating purchase of 100,000 pounds of asbestos shipped from Canadian mines.
GP- 73	Bill from George A. Rowley & Co. dated 4/77 for memo #3825 for 2,000 - 50 pound bags of asbestos shipped from Canadian mines.

EXHIBIT NUMBER	DESCRIPTION
GP- 74	Georgia Pacific purchase order MI00631 date written 4/11/77 ordering 44,000 pounds of asbestos.
GP- 75	Bill from George A. Rowley & Co. memo #3974 order date 4/12/77 indicating 40,000 pounds of asbestos shipped from Canadian mines.
GP- 76	Georgia Pacific intracompany memo to G.E. Wilson from C.W. Lehnert re: Ratio of Asbestos/Asbestos Free Joint Compound Shipments - First Quarter, 1977, dated April 21, 1977.
GP- 77	Chicago Illinois Plant Formula All Purchase Compound C-956, April 22, 1977.
GP- 78	Article "Products containing asbestos banned as cancer-cause suspects", The Dallas Morning News, April 29, 1977.
GP- 79	Telex to All Branch Managers from Stanley S. Dennison, dated April 29, 1977.
GP- 80	Telex to K.W. Brown, I.F. Weibel, M.A. Palmowski, R.V. Favero and H.W. Scharf from Bill Lehnert, dated April 29, 1977.
GP- 81	Telex to Regional Gypsum Managers from D.C. Corkill dated May 2, 1977.
GP- 82	Telex to I.F. Weibel, M.A. Palmowski, R.V. Favero and H.W. Scharf from E.B. Hollingsworth dated May 2, 1977.
GP- 83	Telex to Branch Managers from W.D. Brooks dated May 3, 1977.
GP- 84	Letter to E.L. Aasen, Georgia Pacific Corporation, from Harrison B. Rhodes, Union Carbide Corporation, dated May 6, 1977.
GP- 85	Telex to G.E. Wilson, C.W. Lehnert and D.C. Corkill from E.B. Hollingsworth, dated May 11, 1977.

EXHIBIT NUMBER	DESCRIPTION
GP- 86	Letter to Hon. S. John Byington, U.S. Consumer Product Safety Commission, from John E. Moss, Berkley Bedell, Jerry M. Patterson, Tom Harkin, John W. Jenrette, Jr., Andrew Maguire, James M. Scheuer, Shirley Chisholm, Stephen L. Neal, and Henry A. Waxman, Congress of the United States, House of Representatives, dated May 19, 1977.
GP- 87	Georgia Pacific intracompany memo to E.B. Hollingsworth from C.A. Spear, re: Asbestos-free Ready-mix, dated May 20, 1977.
GP- 88	Letter from J.R. Hurd, Georgia Pacific Corporation to Robert J. Udavcak dated May 20, 1977.
GP- 89	Telex to Dave Corkill, Ed Galloway, Bill Lehnert, Bill Ofitel, Brad Hollingsworth and Bob Favero from George Fowler, dated May 23, 1977.
GP- 90	Minutes of the Semiannual Meeting of the Gypsum Association, The Greenbrier, White Sulphur Springs, West Virginia, October 12-13, 1977.
GP- 91	Undated Instructions regarding relabeling Flintkote bags.
GP- 92	Undated Pictures of Flintkote Flintrock joint system compound packaging for relabeling of Georgia Pacific products.
GP- 93	Notice of Service of Answer to Interrogatories by go Corporation in Scavella v. Armstrong World Industries, Inc., et al., in Case No. 84-45245-CA-42 in Circuit Court of the Eleventh Judicial Circuit in and for Dade County, Florida. October 30, 1987.
GP- 99	Letter dated Nov. 19, 1973, to Chester C. Whiteside, Area Director of OSHA, from J.D. Rauch, Plant Manager for Georgia Pacific.
GP-100	Agreement, Petition, and Articles of Merger between Georgia-Pacific Corporation and Bestwall-Gypsum Co., April 28, 1965.
GP-101	National Gypsum Company letter dated September 24, 1971 from Albert H. Fay to W. H. Hunt, President, Georgia-Pacific Corporation.

EXHIBIT NUMBER	DESCRIPTION
GP-102	Minutes of the Safety Committee Meeting, September 20, 1966.
GP-103	Georgia-Pacific Interdepartmental Communication dated May 7, 1970 from G. E. Wilson, to C. W. Lehnert; subject: Joint Cement.
GP-104	Georgia-Pacific Interdepartmental Communication dated July 27, 1971 from M. F. Fink to K. W. Brown, et al., subject: MICA-Asbestos Controls.
GP-105	Memorandum dated October 7, 1971 from C. W. Lehnert to W. H. Hunt; re: Asbestos Fiber.
GP-106	Georgia-Pacific Corporation letter dated October 11, 1971 from W. H. Hunt to Albert H. Fay, National Gypsum Company, with note to C. W. Lehnert.
GP-107	Letter dated October 14, 1971 from C. W. Lehnert to Albert H. Fay, National Gypsum Company.
GP-108	Minutes of the Annual Meeting of the Gypsum Association, April 5, 1972, attendance list and page 12.
GP-109	Georgia-Pacific Corporation letter dated September 8, 1972 from Bill J. Howard to Department of H.E.W., OSHA.
GP-110	Georgia-Pacific Interdepartmental Communication dated November 20, 1972 from W. N. Gettel to C. W. Lehnert; subject: Asbestos Replacement - ACME Joint System Products.
GP-111	Georgia-Pacific Interdepartmental Communication dated January 20, 1973 from W. J. Hammer to E. B. Hollingsworth; re: Akron J.O. #1568, Dust Collection Equipment for Joint System Plant.
GP-112	Georgia-Pacific Interdepartmental Communication dated February 23, 1973 from C. W. Lehnert to L. E. Winter; subject: All Purpose Trial - Memphis.
GP-113	Document titled "OSHA Warns That Dry - Wall Spackling Contains Dangerous Asbestos Hazard", stamped "Received April 26, 1974".

EXHIBIT NUMBER	DESCRIPTION
GP-114	Georgia-Pacific Intracompany Memo dated August 23, 1974 from R. L. McCallister to L. K. Ryder; re: Akron, New York - Asbestos Exposure; with attached articles stamped "Aug 26, 1974, "Asbestos Poses Health Hazard" and "Director H. Edward White Visits Asbestos Mine/Mill" from the California Safety News.
GP-116	Copy of folder label "Asbestos, Product Brochures 1974", with attached Georgia-Pacific brochure, "Do-It Yourself, Gypsum Wallboard Application".
GP-117	Georgia-Pacific Intracompany Memo dated November 17, 1975 from W. D. Brooks to D. Corkill; re: Ready-Mix, Asbestos Free.
GP-119	Georgia-Pacific Intracompany Memo dated March 2, 1976 from W. D. Brooks to Jack Hopkins; subject: All Purpose re: Fischer Lime & Cement.
GP-120	Georgia-Pacific Intracompany Memo dated March 18, 1976 from D. C. Corkill to O. E. Burch; subject: Asbestos Free Ready-Mix.
GP-121	Telex dated March 30, 1976 from C. W. Lehnert to G. F. Fowler.
GP-122	Georgia-Pacific Intracompany Memo dated July 16, 1976 from G. E. Wilson to K. W. Brown, et al., subject: One-Gallon Ready-Mix.
GP-124	Georgia-Pacific Corporation Round Trip Letter from T. R. McCoy to Bill Brooks, undated.
GP-125	Telex dated 08/11/77 from D. C. Corkill to E. G. Reynolds, et al.
GP-126	Telex dated 8-11-77 from W. D. Brooks to Dave Corkill; re: Asbestos Type JT System.
GP-127	Telex dated 08/12/77 from G. Baitinger to Gypsum Regional Managers.
GP-128	Telex dated 8-15-77 from W. D. Brooks to Mike Copenhaver; re: Asbestos Type Ready Mix.
GP-131	Georgia-Pacific Annual Report 1994.

EXHIBIT NUMBER	DESCRIPTION
GP-132	State of New York, Department of Labor Summons No. F-16/20 dated April 5, 1973 to Georgia Pacific Corporation.
GP-133	Gypsum Association letter dated June 11, 1973 from H. B. Carlsen to The Board of Directors; re: Asbestos in Joint Treatment Compound.
GP-134	Letter dated June 21, 1973 from Glenn E. Wilson to H. B. Colman.
GP-135	Telex dated May 10, 1974 from M. F. Fink to K. W. Brown and M. A. Palmowski with reply to F. M. Fink from D. M. Watson.
GP-136	Georgia-Pacific Intracompany Memo dated May 20, 1974 from G. K. Wilson to E. B. Hollingsworth and T. W. Richards; subject: OSHA Regulations - Joint Compound.
GP-137	Occupational Safety and Health Administration, Atlanta Area Office Citation No. T-2710 dated August 7, 1975 to Georgia Pacific Corporation, Marietta, Georgia; with attachments: Notification of Proposed Penalty and handwritten notes.
GP-138	Kirk-Othmer Encyclopedia of Chemical Technology, Volume 2, Copyright 1963, contents page; section on Asbestos, pages 734-747; stamped "Property of Georgia-Pacific Corporation".
GP-139	The Merck Index, An Encyclopedia of Chemicals and Drugs, Eighth Edition, 1968; page 105 Asbestos; stamped "Property of Georgia-Pacific Corporation".
GP-140	Report titled "An Ordering of the NIOSH Suspected Carcinogens List Based Only on Data Contained in the List, U. S. Environmental Protection Agency, March 1976; stamped "Property of Georgia-Pacific Corporation".
GP-141	Georgia-Pacific Interdepartmental Communication dated January 10, 1973 from W. J. Hammer to E. B. Hollingsworth; subject: Akron J.O. #1568, Dust Collection Equipment for Joint System Plant.
GP-142	Georgia-Pacific Interdepartmental Communication dated May 16, 1973 from H. W. Peele to E. B. Hollingsworth; subject: Akron Chest X-Rays.

EXHIBIT NUMBER	DESCRIPTION
GP-143	Department of Radiology x-ray report dated July 18, 1973, regarding Francis McCargar.
GP-144	Georgia-Pacific Intracompany Memo dated April 26, 1974 from Robert L. McCallister to Lance Ryder; re: Akron NY - Chest X-Rays & Ventilation Study; with attachments.
GP-145	Georgia-Pacific Intracompany Memo dated July 7, 1974 from Ed. Sing to J. R. Hurd; subject: Monitoring for Asbestos Dust; with attachment: List of Industrial Hygiene Consultants.
GP-146	Telex dated March 15, 1976 from E. G. Reynolds to D. C. Corkill.
GP-147	Georgia-Pacific Intracompany Memo dated April 4, 1976 from R. V. Favero to E. B. Hollingsworth; subject: Asbestos Free Ready Mix.
GP-148	Georgia-Pacific Intercompany Memo dated April 13, 1974 from D.C.C. (Corkill) to Lehnert; subject: Asbestos; with attachment: Newsletter From Gypsum Services Corp. "Asbestos: Dangers in sanding".
GP-151	United States Government, U. S. Consumer Product Safety Commission, Memorandum dated June 2, 1977 from Leo T. Duffy to Don R. Clay; subject: Medical Comment on the Asbestos Problem.
GP-152	United States Government, U. S. Consumer Product Safety Commission, Memorandum dated June 3, 1977 from Rita Orzel to Don R. Clay; subject: Toxicological/Medical Input for Proposed Federal Register Notice On Asbestos; with attached report.