

IN RE: ALL ASBESTOS-RELATED
INJURY OR DEATH CASES FILED
BY BARON & BUDD, P.C. OR TO
BE FILED BY BARON & BUDD, P.C.
IN DALLAS COUNTY, TEXAS

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IN THE DISTRICT COURTS OF
DALLAS COUNTY, TEXAS
160TH JUDICIAL DISTRICT

DEFENDANT U. S. GYPSUM COMPANY'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' INTERROGATORIES AND REQUESTS FOR PRODUCTION

TO: Plaintiffs, by and through their attorney of record, Mr.
Russell W. Budd, Baron & Budd, P.C., The Centrum, 3102
Oak Lawn Ave., Ste. 1100, Dallas, TX 75219

COMES NOW, U. S. GYPSUM COMPANY, Defendant in the above-
entitled and numbered cause, and files the attached objections and
responses to Plaintiffs' Interrogatories.

Respectfully submitted,

DeHAY & ELLISTON, L.L.P.
1500 Maxus Energy Tower
717 North Harwood Street
Dallas, Texas 75201-6508
Telephone: (214) 953-5454
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By: David W. Crowe
DAVID W. CROWE
State Bar No. 05164250

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and
foregoing document has been forwarded to Plaintiffs' counsel of
record, Mr. Russell W. Budd, Baron & Budd, by hand delivery on the
8 day of SEPT., 1993.

David W. Crowe
DAVID W. CROWE

DEFENDANT U. S. GYPSUM COMPANY'S OBJECTIONS AND
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PREFATORY STATEMENT

United States Gypsum Company (hereinafter "U.S. Gypsum") has, to the best of its abilities, gathered non-privileged documents into a document repository for inspection by plaintiffs' counsel in response to requests for production served in asbestos litigation. These documents provide information that supplements and expands upon that provided in these answers to Interrogatories and Requests for Production. Accordingly, by way of further response to these Interrogatories and Requests for Production, U.S. Gypsum hereby offers to make available these documents at a mutually convenient time at its offices at 125 S. Franklin Street, Chicago, Illinois.

In giving its responses to Interrogatories and Requests for Production as to asbestos-containing products, U.S. Gypsum refers to products containing commercial asbestos as part of their formulation and to the type of commercial asbestos used as part of the formulation.

OBJECTIONS

U.S. Gypsum objects to the manner in which plaintiff purports to include in its definition of U.S. Gypsum "any of its merged, consolidated, or acquired predecessors, division, subsidiaries, foreign subsidiaries, foreign subsidiaries of predecessors, and/or affiliates known to have mined manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products into ships or other water-going vessels. This definition includes present and former officers, directors, agents, employees, and all other persons acting or purporting to act on behalf of U.S. Gypsum Company or its predecessors, subsidiaries, and/or affiliates known to have mined, manufactured, sold, marketed or distributed asbestos or asbestos-containing products. 'Predecessors' further means any business firm, whether or not incorporated, which had all or some of its assets purchased by you or came to be acquired by you whether by merger, consolidation, or otherwise known to have mined, manufactured, sold, marketed, utilized, or distributed asbestos or asbestos-containing products. 'Subsidiaries' further means any business firm whether or not incorporated, which is or was in any way owned or controlled, in whole or in part by defendant or its predecessors and which is known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products." In that U.S. Gypsum Company is the named defendant, this definition is overly broad and would require U.S. Gypsum to engage in unduly burdensome research, divulge privileged information and produce privilege documents. This defendant, United States Gypsum Company, responds to these Interrogatories and Requests for Production on behalf of itself.

U.S. Gypsum further objects to these Interrogatories and Requests for Production to the extent they ask for "identification" of voluminous documents on the ground that they are overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. As set forth infra, U.S. Gypsum will produce documents which are the proper subjects of an appropriate document request.

Finally, to this defendant's best current knowledge, information and belief, this defendant believes that its products were never used in the shipbuilding trade. This defendant never manufactured any asbestos insulation material suited for shipbuilding. Most of this defendant's asbestos-containing products were gypsum-based and therefore were not suitable for use around water, moisture, ships, etc.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify by name and location each plant ever owned, operated, or at a later time bought or at a later time bought or under control of U.S. Gypsum Company, in which asbestos-containing products were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dated each plant is or was in operation, and the time span during which each asbestos-containing product was manufactured, assembled, or prepared for sale or marketing.

Answer:

See attached Schedule D.

INTERROGATORY NO. 2:

Does U.S. Gypsum Company have in its possession or custody any x-rays, taken before 1970, of individuals who worked in any plant in which asbestos-containing products were manufactured, assembled, or prepared for sale or marketing? If so, state:

- a. The name of each plant;
- b. The location of each plant;
- c. The time periods in which asbestos-containing products were manufactured, assembled, or prepared for sale at each plant;
- d. The date each plant closed;
- e. Where such x-rays are kept; and
- f. The occupations of the individuals who had x-rays taken.

Answer:

Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 3:

Has U.S. Gypsum Company turned over any papers, documents, writings concerning asbestos, the health effects of asbestos, or asbestos-related disease to any law firm? If so, state:

- a. A description of each paper, document, or writing; and
- b. The name and address of the law firm.

Answer:

Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 4:

Has U. S. Gypsum Company, or attorneys representing U. S. Gypsum Company, destroyed any documents which refer or relate to asbestos, the health effects of asbestos, asbestos-containing products, or dust studies that measured asbestos dust? If so, state:

- a. A description of each document;
- b. The author of each document;
- c. A summary of the subject matter of each document; and
- d. The reason for the destruction of each document.

Answer:

This defendant has a record retention policy in place which will be made available. To this defendant's best knowledge, information and belief, no documents referring or relating to asbestos, etc. have been destroyed since this defendant became involved in the asbestos litigation.

RESPONSES TO REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.:

Produce copies of all writings or documents relating to asbestos, the health effects of asbestos, or asbestos-containing products that U.S. Gypsum Company has provided to, and which are currently kept by, any law firm, other than writings or documents that are subject to the work product privilege.

RESPONSE:

Objection. This Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 2.:

Produce all reports, documents or writings of dust studies performed in U.S. Gypsum Company plants or facilities in which concentrations of asbestos dust were measured.

RESPONSE:

Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 3.:

Produce copies of all writings, documentation that show or refer to the fact that Howard Bowman testified at any OSHA hearing concerning asbestos or asbestos-containing products.

RESPONSE:

To this defendant's best current knowledge, information, and belief, none.

REQUEST FOR PRODUCTION NO. 4.:

Produce all studies performed for U.S. Gypsum Company by Metropolitan Life Insurance Company, The Travelers Companies, Commercial Union Insurance Companies, Liberty Mutual Insurance Group, and/or any subsidiaries, divisions, affiliates, or predecessors-in-interest of such companies relating to the health effects of exposure to asbestos dust.

RESPONSE:

Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

I, F. M. Poremski, declare:

I am the Director, Financial & Accounting Services of United States Gypsum Company, one of the above named defendants, and am authorized to make this verification for and on behalf of said company;

I have read the foregoing Answers, Objections, and other Responses to Plaintiff's Interrogatories and am informed and believe that the same is true and on that ground allege that the matters therein stated are true.

I declare, under penalty of perjury, that the foregoing is true and correct, and that this declaration was executed on September 7, 1993 in Chicago, Illinois.

F. M. Poremski

F. M. Poremski

Subscribed and sworn to before me
this 7th day of September 1993.

Sally A. Bednarcik

Notary Public

"OFFICIAL SEAL"
SALLY A. BEDNARCIK
Notary Public, State of Illinois
My Commission Expires 6/19/94

ASBESTOS-CONTAINING PRODUCTS MANUFACTURED BY U.S. GYPSUM

The dates listed here are taken from product operating bulletins which governed the manufacturing process. The cancellation of these operating bulletins usually coincided with cessation of production, but occasionally bulletins would remain uncanceled after the manufacture of a product had been discontinued. Consequently, the years shown for cancellation of authorization are believed to be the last possible year of manufacture, although manufacture may have in fact ended earlier. Production dates established through documentation other than product operating bulletins have been footnoted. Temporary and trial production runs are included (along with regular production). These have been footnoted for Firecode and can be determined for other products from a review of operating bulletins. With texture products, such runs were occasionally given slight name variations.

<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SABINITE ¹	Acoustical Plaster	1930	1945	East Chicago, IN
		1930	1964 ²	Fort Dodge, IA
		1930	1945	Gypsum, OH
		1930	1946	Midland, CA
		1939	1945	Nephi, UT
		1930	1964 ²	New Brighton, NY
		1931	1964	Hagersville, CAN ³
		1931	1948	Hillsborough, CAN ³
RED TOP ACOUSTICAL PLASTER	Acoustical Plaster	1951	1953	Fort Dodge, IA
		1951	1953	New Brighton, NY
HI-LITE	Acoustical Plaster	1953	1954	Fort Dodge, IA ⁴
		1953	1954	New Brighton, NY ⁴
		1955	1972	Fort Dodge, IA
		1955	1972	New Brighton, NY
AUDICOTE ³	Acoustical Plaster	1954	1972	Fort Dodge, IA
		1954	1972	New Brighton, NY
		1955	1956	Midland, CA ⁴
		1961	1975	Hagersville, CAN ³

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP GYPSUM PLASTER (marketed as CEMENT PLASTER until 1967)?	Building Plaster	1943 1950 1944 1955 only	1947 1971 1974	Loveland, CO Hagersville, CAN ³ Hillsborough, CAN ³ Montreal, CAN ³
RED TOP GYPSUM PLASTER FOR MACHINE APPLICATION (marketed as CEMENT PLASTER FOR MACHINE APPLICATION until 1967)?	Building Plaster	1961 1961 1962 1959 only 1957 1957	1966 1966 1966 1972 1972	Detroit, MI Gypsum, OH Oakfield, NY Southard, OX ⁶ Hagersville, CAN ³ Montreal, CAN ³
RED TOP TROWEL FINISH	Building Plaster	1930 1930 1950 1930 1930	1935 1935 1951 1935 1935	East Chicago, IN Fort Dodge, IA Fort Dodge, IA Gypsum, OH New Brighton, NY
HAINSCOAT TROWEL FINISH	Building Plaster	1946 1946 only	1953	Fort Dodge, IA Southard, OK
ORIENTAL INTERIOR FINISH	Building Plaster	1942 1942 1942 1949 1942 1942 1949 1942	1944 1972 1944 1950 1946 1971; 1972 1950 1972	Boston, MA Fort Dodge, IA Gypsum, OH Jacksonville, FL Milwaukee, WI New Brighton, NY Norfolk, VA Oakfield, NY

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
		1942	1944	Philadelphia, PA
		1949	1973	Philadelphia, PA
		1942	1973	Sweetwater, TX
ORIENTAL EXTERIOR FINISH STUCCO	Building Plaster	1932	1944	Boston, MA
		1930	1973	Fort Dodge, IA
		1930	1944	Gypsum, OH
		1949	1972	Jacksonville, FL
		1932	1946	Milwaukee, WI
		1930	1972	New Brighton, NY
		1949	1973	Norfolk, VA
		1930	1972	Oakfield, NY
		1932	1944	Philadelphia, PA
		1949	1972	Philadelphia, PA
		1930	1972	Sweetwater, TX
		1964	1974	Montreal, CAN
RED TOP PATCHING PLASTER	Building Plaster	1929	1947	Gypsum, OH
		1942	1951	Milwaukee, WI
		1929	1946	Nephi, UT
		1929	1947	New Brighton, NY
		1944	1947	South Gate, CA
RED TOP COVER COAT FINISH PLASTER	Building Plaster	1948	1964	New Brighton, NY
		1948	1954	Southard, OK
		1956 only		Southard, OK

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP WOOD FIBER PLASTER	Building Plaster	1931	1941	Detroit, MI
REGULAR BASECOAT		1945	1963	Detroit, MI
		1930	1972	East Chicago, IN
		1952	1960	Empira, NV
		1931	1963	Fort Dodge, IA
		1948	1952	Gerlach, NV
		1931	?	Gypsum, OH
		1945	1972	Heath, MT
		1940	?	Laramie, WY
		1945	1966	Loveland, CO
		1945	1959	Midland, CA
		1945	1952	Nephi, UT
		1931	1940	Oakfield, NY
		1945	1960	Plaster City, CA
		1948	1972	Sigurd, UT
		1931	1967	Southard, OK
		1936	1965	Sweetwater, TX
RED TOP WOOD FIBER PLASTER MACHINE APPLICATION-BASECOAT	Building Plaster	1961	1972	East Chicago, IN
		1963	1966	Fort Dodge, IA
		1960	1961	Plaster City, CA

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP STRUCTOLITE PLASTER FOR MACHINE APPLICATION-BASECOAT'	Building Plaster	1955 1955 1971 1954 1954 1955 1964 1955 1955 1955 1955 1955 1955 1955 1955 1958 1955 1957 1954 1954	1962 1962 1972 1963 1960 1963 1973 1962 1962 1962 1959 1963 1962 1962 1962 1963 1962 1962 1962 1963 1962	Boston, MA Detroit, MI Detroit, MI East Chicago, IN Empire, NV Fort Dodge, IA Fort Dodge, IA Gypsum, OH Jacksonville, FL Loveland, CO Milwaukee, WI New Brighton, NY Norfolk, VA Oakfield, NY Philadelphia, PA Plaster City, CA Plasterco, VA Shoals, IN Southard, OK Sweetwater, TX
RED TOP BONDCRETE PLASTER-BASECOAT'	Building Plaster	1940 1964 1961	1943 1975 1970	Midland, CA Hagersville, CAN' Montreal, CAN'
RED TOP SANDED WALL PLASTER'	Building Plaster	1937 1931	1940 1937	Black Rock, NY Detroit, MI
PYROBAR MORTAR MIX'	Tile Cement	1967 1965	1970 1972	East Chicago, IN New Brighton, NY
ACOUSTONE 120	Ceiling Tile	1968 1968	1976 1976	Gypsum, OH Walworth, WI

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
ACOUSTONE 180	Celling Tile	1966 1966	1975 1975	Gypsum, OH Walworth, WI
RED TOP FIRECODE PLASTER	Fireproofing Plaster	1962 1962 1959 ¹⁰ 1960 1959 ¹⁰ 1961 1959 ¹⁰ 1962 1962 1961 1962 1964 only	1963 1963 1964 1964 1964 1964 1964 1963 1963 1963 1963	Boston, MA Detroit, MI East Chicago, IN Empire, NV Fort Dodge, IA Gypsum, OH New Brighton, NY Oakfield, NY Philadelphia, PA Sperry, IA Stony Point, NY Hagersville, CAN ³
RED TOP FIRECODE "V" PLASTER	Fireproofing Plaster	1965 1962 1962 1962 1962 1964 1962 1962 1963 1962 1962 1962 1967 1962 1962 1962 1967 1962 1963 1963 1962 1963 1963 1963	1969 1963 1963 1969 ¹¹ 1969 ¹¹ 1965 1963 1968 1967 1969 ¹² 1963 1963 1968 1963 1969 ¹¹	Baltimore, MD Boston, MA Detroit, MI East Chicago, IN Empire, NV Fort Dodge, IA Galena Park, TX Gypsum, OH Midland, CA New Brighton, NY Oakfield, NY Philadelphia, PA Plaster City, CA Stony Point, NY Sweetwater, TX Hagersville, CAN ³

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Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
SPRAYDON STANDARD A ¹²	Fireproofing	1965 1965 1970	1971 1971 1971	Plainfield, NJ Torrance, CA Weston, CAN ³
SPRAYDON STANDARD G ¹²	Fireproofing	1968 1968 1970 only	1970 1970	Plainfield, NJ Torrance, CA Weston, CAN ³
SPRAYDON POWERCOTE ¹³	Thermal Insulation	1969 1969 1969 1970	1971 1971 1971 1971	Plainfield, NJ Torrance, CA Corsicana, TX ¹³ Weston, CAN ³
K-FAC INDUSTRIAL INSULATING BLOCK	Rigid Block Insulation	1943	1950	East Chicago, IN
K-FAC 19 ¹⁴	Rigid Block Insulation	1970	1971	Greenville, MS
FIRE DOOR COREBOARD ¹⁵	Fire Board	1966	1971	Greenville, MS
COLUMN FIRE BOARD ¹⁶	Fire Board	1966 only		Greenville, MS
SHEETROCK RADIANT HEAT FILLER - MACHINE APPLICATION	Plaster	1968 1969 1968 1969	1971 1971 1971 1971	Baltimore, MD Boston, MA Detroit, MI East Chicago, IN

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Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
PAC-TEX TEXTURE PAINT	Texture	1970	1972	Empire, NV
		1968	1971	Ft. Dodge, IA
		1969	1971	Gypsum, OH
		1969	1971	New Brighton, NY
		1968	1971	Norfolk, VA
		1969	1971	Philadelphia, PA
		1968	1971	Plaster City, CA
		1969	1970	Shoals, IN
		1969	1972	Sweetwater, TX
		1962	1963	Dallas, TX
A-B TEX TEXTURE PAINT	Texture	1943	1970	South Gate, CA
		1949	1962	Sweetwater, TX
		1959	1973	Chamblee, GA
		1935	1949	Gypsum, OH
		1954	1973	Gypsum, OH
		1973 only		Midway, IL
		1935	1949	New Brighton, NY
		1954	1968	New Brighton, NY
		1943	1944	South Gate, CA
		1954	1973	South Gate, CA
TEXTURE PAINT	Texture	1948	1950	Sweetwater, TX
		1954	1955	Sweetwater, TX
		1962	1977	Hagersville, CAN ¹
		1966	1967	Montreal, CAN ¹
		1959	1973	Chamblee, GA
		1964	1973	Dallas, TX
		1930	1973	Gypsum, OH
		1937	1973	New Brighton, NY
		1948	1970	South Gate, CA
		1948	1964	Sweetwater, TX

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
TEXOLITE DRY FILL	Texture	1959	1961	New Brighton, NY ¹⁷
TEXOLITE DRYWALL	Texture	1963	1965	Dallas, TX
SURFACER, AGGREGATED, renamed DRYWALL		1961	1977	Gypsum, OH
SURFACER, TEXTURE XII, in 1965		1970	1972	Midway, IL
		1963	1965	New Brighton, NY
		1963	1965	South Gate, CA
SPRAY TEXTURE PAINT (OF FINISH)	Texture	1961	1976	Chamblee, GA
		1961	1976	Dallas, TX
		1960	1976	Gypsum, OH
		1970	1976	Midway, IL
		1966	1968	New Brighton, NY
		1956	1973	South Gate, CA
		1959	1961	Sweetwater, GA
MULTI-PURPOSE TEXTURE FINISH	Texture	1964	1976	Chamblee, GA
		1963	1976	Dallas, TX
		1965	1976	Gypsum, OH
		1971	1976	Midway, IL
		1965	1966	New Brighton, NY
IMPROVED SPRAY TEXTURE B-8	Texture	1963	1973	South Gate, CA
SANDED, COLORED TEXTURE PAINT	Texture	1952	1953	New Brighton, NY
		1952	1955	Sweetwater, TX
CONCRETE CEILING TEXTURE	Texture	1970	1973	South Gate, CA
TEXTONE TEXTURE FINISH	Texture	1959	1972	Chamblee, GA
		1962	1972	Dallas, TX

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
TEXOLITE BLOCK FILLER		1928	1975	Gypsum, OH
		1937	1972	New Brighton, NY
		1944	1972	South Gate, CA
		1949	1972	Sweetwater, TX
		1965	1977	Hagersville, CAN ^{2,18}
		1961	1966	Chamblee, GA
		1966	?	Dallas, TX
		1958	?	Gypsum, OH
		1958	?	New Brighton, NY
		1959	1966	South Gate, CA
SHEETROCK SMOOTHCOAT	Texture	1959	1966	Sweetwater, TX
		1966	1974	Dallas, TX
		1965	1974	Gypsum, OH
		1971	1974	Midway, IL
		1970	1972	South Gate, CA
SHEETROCK RADIANT HEAT SIMULATED ACOUSTICAL TEXTURE	Simulated Acoustical Ceiling Texture	1962	1972	Dallas, TX
		1955 only	1964	New Brighton, NY
		1954		Sweetwater, TX
SPECIAL TEXTURE PAINT	Texture	1970	1976	Gypsum, OH
		1970	1976	Midway, IL
TEXTURE XII, SUPER VINYL	Texture	1967	1968	Dallas, TX
		1964	1968	Gypsum, OH
		1971 only		Midway, IL
AGGREGATED SPRAY FINISH, WHITE	Texture			

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SMOOTH HARD FINISH	Texture	1968	1969	South Gate, CA
SUPERHARD SPRAY TEXTURE FINISH	Texture	1968	1969	South Gate, CA
EXTERIOR TEXTURE WALLBOARD FINISH	Texture	1971 1971	1973 1972	Dallas, TX South Gate, CA
SIMULATED ACOUSTICAL SPRAY TEXTURE/FINISH	Simulated Acoustical Ceiling Texture	1964 only 1963 1959 1961 1959 1961	1964 1964 1964 1964 1964 1962	Chamblee, GA Dallas, TX Gypsum, OH New Brighton, NY South Gate, CA Sweetwater, TX
"QT" SIMULATED ACOUSTICAL SPRAY TEXTURE	Simulated Acoustical Ceiling Texture	1963	1973	South Gate, CA
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-REGULAR	Simulated Acoustical Ceiling Texture	1964 1967 1964 1966 only 1968	1965 1969 1968 1968 1973	Dallas, TX Dallas, TX New Brighton, NY South Gate, CA South Gate, CA
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-LC	Simulated Acoustical Ceiling Texture	1965 1965 1965 1965 1966 only	1968 1968 1966 1966	Dallas, TX Gypsum, OH New Brighton, NY Hagersville, CAN ³ Montreal, CAN ³

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
IMPERIAL "QT" (SPRAY) TEXTURE FINISH - NC-1C	Simulated Acoustical Ceiling Texture	1968 1966 1966 1970 1966	1976 1974 1976 1975 1975	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-EXTRA HARD FINE	Simulated Acoustical Ceiling Texture	1964 1964 1964 1964	1974 1971 1974 1973	Chamblee, GA Dallas, TX Gypsum, OH New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-VERMICULITE, COARSE and REGULAR	Simulated Acoustical Ceiling Texture	1967 1966 1968 1970 1968	1976 1976 1976 1976 1976	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-POLYSTYRENE, COARSE and REGULAR	Simulated Acoustical Ceiling Texture	1967	1976	Dallas, TX
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-NC4	Simulated Acoustical Ceiling Texture	1968 1968 1967 1970 1967	1972 1971 1972 1972 1972	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
READY-MIXED IMPERIAL "QT" SPRAY FINISH	Simulated Acoustical Ceiling Texture	1966	1967	New Brighton, NY

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
THERMALUX RADIANT HEATING PANELS	Radiant Heating Panels	1964	1969	Shoals, IN (assembled)
<u>Other Products (by generic group)</u>				
PIPECOVERINGS, ASBESTOS PAPER, ASBESTOS BOARD		1936	1938 ¹⁹	Jersey City, NJ
PASTE SPACKLING PUTTY		1952	1975	Chamblee, GA Gypsum, OH New Brighton, NY Sweetwater, TX
JOINT COMPOUNDS		1920's?	1976	Calgary, CAN ²⁰ Chamblee, GA Dallas, TX East Chicago, IN Gypsum, OH Hagersville, CAN ²⁰ Jacksonville, FL Midway, IL Montreal, CAN ²⁰ New Brighton, NY South Gate, CA Sweetwater, TX
ADHESIVES		1953 1973 1968 1955 1971	1973 1974 1973 1965 1977	Gypsum, OH Midway, IL ¹⁶ Nashville, TN New Brighton, NY Rosemont, IL ²¹

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SIDING SHINGLES		1961	1972	South Gate, CA
		1957	1962	Sweetwater, TX
		1974	1977	Trenton, NJ ²⁴
		1937	1975	East Chicago, IN
ROOFING PRODUCTS		1936	1975	Jersey City, NJ
		1967	1978	Mt. Dennis, CAN ³
		1967	1978	St. Hubert St., CAN ³
		1934	1975	St. Paul, MN
		1934	1960	South Bend, IN
		1954	1977 ²³	South Gate, CA
		1937	1960	Toronto, CAN ³
		1967	1978	Vancouver, CAN ³
INSULATING CEMENT		1936	1938	Jersey City, NJ

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NOTE:

Not all products were necessarily made at all plants at all times listed, even though they were authorized for production.

- 1 At some period of time between 1926 and 1930, Sabinite is believed to have been manufactured at U.S. Gypsum's plant at Arden, Nevada. However, no bulletins for that plant have been located, it having been closed in 1930.
- 2 Sabinite may have been produced until this date, but sales diminished substantially by the mid-1950's.
- 3 Not sold in the United States.
- 4 Two-component Hi-Lite plaster was authorized for production in June 1953 and discontinued in August 1954. Approximately 4 tons of a temporary variant was produced during 1953, and packaged as "Lime-Keene's Acoustical Plaster."
- 5 Marketed as Red Top Acoustical Plaster with the word 'Spray' stenciled on the bag from 1954 to 1955; marketed as Red Top Spray On Acoustical Plaster in 1955; marketed as Red Top Audicote Acoustical Plaster from 1955 to 1968.
- 6 A trial job of 3 tons only.
- 7 Contained less than 1.0% asbestos (not asbestos-containing products under applicable law).
- 8 Two month production run only.
- 9 Temporary production of Firecode only.
- 10 Trial jobs were produced in 1959 for tests by Underwriters' Laboratories; regular production commenced in 1960.
- 11 As of December of 1969 Firecode V had been dropped from U.S. Gypsum's product line and sales of this product had not been actively solicited by the company for some time. U.S. Gypsum believes that a limited quantity of Firecode V was produced in early 1970 at the East Chicago plant for the completion of a single job already in progress.

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- 12 U.S. Gypsum manufactured SprayDon pursuant to the specifications of Sprayon Research Corporation. While Types A and G remained on operating bulletins until 1973, production of G was discontinued in 1970, and A was discontinued on January 1, 1972. Type I, though authorized, was never produced.
- 13 From production records.
- 14 K-Pac 19 was produced for A.P. Green and packaged and sold by that company under the name INSBLOK. Information contained in plant records suggests that production may have commenced in 1969.
- 15 Information contained in plant records suggests that production may have commenced in 1965.
- 16 Temporary production only.
- 17 Trial job authorized for temporary production only on and off from 1959 to 1961.
- 18 Marketed from 1970 to 1977 as Sheetrock Texture Finish Paint in Canada.
- 19 Although authorization to manufacture these products was not cancelled until 1940, the last sales took place in 1938.
- 20 Actual Canadian production ceased in 1978.
- 21 This product line was manufactured by a company that became a U.S. Gypsum subsidiary in 1971, and records of the production history are incomplete.
- 22 Records regarding the production history of this product line are incomplete.
- 23 Though authorized for production until 1978, actual production ceased in 1977.

Most of the products identified in this exhibit have a shelf life of approximately six months, with some variation due to humidity and storage conditions. It is the policy of the defendant to provide this information to all customers. Therefore, date of last production approximates date of last sale, though U.S. Gypsum is not certain whether shelf life guidelines were adhered to by its customers. Reasonable investigation is continuing.

Further information concerning products which are established to be at issue is contained in documents which will be made available for inspection at the offices of United States Gypsum, 125 South Franklin Street, Chicago, IL 60606-4678.