FILE NAME: Shell (SHEL)

DATE: 0000

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DOCUMENT DESCRIPTION: Excerpt - Defendant's Responses to Plaintiff's Interrogatories

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SHELL OIL COMPANY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

IN RE: COMPLEX ASBESTOS LITIGATION	NO. 828684
	RESPONSE OF DEFENDANT SHELL OIL COMPANY TO PLAINTIFFS' STANDARD ASBESTOS CASE INTERROGATORIES TO ALL DEFENDANTS

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: SHELL OIL COMPANY

SET NUMBER: GENERAL ORDER 129

Defendant SHELL OIL COMPANY (hereinafter "Shell") provides the following objections and responses to San Francisco Superior Court General Order No. 129 Plaintiffs' Standard Interrogatories to All Defendants as follows:

PRELIMINARY STATEMENT

Defendant's responses are based upon as diligent and complete an inquiry as possible as of this date and are subject to corrections for errors, mistakes or omissions. Defendant anticipates that additional discovery, investigation, and analysis may supply additional facts, add meaning to known facts,

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INTERROGATORY NO. 2:

State the date of first employment with YOU, and the dates and titles of each job position the person verifying these interrogatories has held while employed by YOU.

RESPONSE TO INTERROGATORY NO. 2:

Ms. Johnson has been employed at the Martinez facility since 1962. Her current job title is Senior Office Assistant, Human Resources, Legal Support.

INTERROGATORY NO. 3:

State whether or not YOU are a corporation, and if so, state:

A. YOUR correct corporate name;

B. YOUR state of incorporation;

C. The date of YOUR incorporation;

D. The address of YOUR principal place of business;

E. Whether or not YOU have ever held a certificate of authority to do business in the State of California, and if so, the inclusive dates of any certificate;

F. If YOU are wholly owned or the majority interest of YOUR company is owned by another business entity, state the entity's name and principal place of business;

G. Whether YOU have any business offices in California, and, if so, YOUR principal place of business in California.

RESPONSE TO INTERROGATORY NO. 3:

Yes.

A. Shell Oil Company.

B. Delaware.

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C. September 30, 1949.

D. One Shell Plaza, 910 Louisiana Street, Houston, Texas 77002.

E. Shell has been certified to do business in the State of California continuously since September 30, 1949.

F. SPNV Holdings, Inc., a Delaware corporation.

G. Shell does not maintain a principal business office in California. Its address for service of process is CT Corporation System, 818 West Seventh Street, Los Angeles, California 90017.

INTERROGATORY NO. 4:

Have YOU ever been identified, known, or done business under any other name in the State of California?

RESPONSE TO INTERROGATORY NO. 4:

Yes.

INTERROGATORY NO. 5:

If your answer to Interrogatory No. 4 is in the affirmative, please state such name or names and the time period during which THIS DEFENDANT was so known or identified.

RESPONSE TO INTERROGATORY NO. 5:

Shell Company of California (1912 to 1922); Shell Union Oil Corporation (1922 to 1939); Shell Oil Company, Inc. (1939 to 1949).

INTERROGATORY NO. 6:

If YOU are not a corporation, what is YOUR business structure (partnership, joint venture, sole proprietorship, etc.).

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L. No.

M. No.

N. No.

O. Yes.

P. No.

Q. No.

R. No.

S. No.

T. No.

U. No.

V. Shell and/or its employees have been members of various business groups and associations, but Shell is unable to identify at this time all of the groups and associations that may be relevant to this Interrogatory.

(w) Unknown. Shell is aware that certain of its personnel attended conferences and meetings of various organizations in an attempt to learn of potential hazards in the workplace, including its former Industrial Hygienist, Howard Kusnetz, who attended American Petroleum Institute meetings.

INTERROGATORY NO. 14:

For each organization, association or other entity identified in YOUR Response to Interrogatory No. 13, please state:

A. The dates during which THIS DEFENDANT was a member;

B. The name(s) of any publication(s) received by THIS DEFENDANT from such association or organization;

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C. The name of any committee or subcommittee of which THIS DEFENDANT was a member, and the dates of such committee or subcommittee membership.

RESPONSE TO INTERROGATORY NO. 14:

A. American Petroleum Institute - approximately 1949 (the limit of API's records) to present.

National Safety Council - December 1943 to present.

Industrial Hygiene Foundation - approximately 1972 to approximately 1977.

The dates of Shell's memberships in other organizations listed in response to Interrogatory No. 13 are presently unknown.

B. Shell is currently unaware of the title(s) of any publications it may have received from the organizations listed in its response to Interrogatory No. 13. The records of those organizations may contain this information.

C. Shell has been a member of the American Petroleum Institute's Medical Advisory Committee since approximately 1972 (the limit of Shell's records). Membership in other committees and/or subcommittees is unknown at this time.

INTERROGATORY NO. 15:

Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of New Jersey relating to asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks containing

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