

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR DADE COUNTY, FLORIDA

CASE NO.: 84-45245 CA 42

FLORIDA BAR NO. 046600

MICHAEL SCAVELLA, Personal
Representative of the Estate
and Survivors of
ELBRIDGE SCAVELLA, Deceased,

Plaintiff,

vs.

ARMSTRONG WORLD INDUSTRIES,
INC., et al.,

Defendants.



NOTICE OF SERVICE OF ANSWER TO INTERROGATORIES

COMES NOW Defendant, GEORGIA-PACIFIC CORPORATION, by
and through its undersigned attorneys and files this its Notice
of Service of Answer to Plaintiff's Interrogatory number 13.

I HEREBY CERTIFY that a true and correct copy of the
foregoing was mailed this 30th day of October, 1987 to all
counsel of record on the attached Service List.

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By: Richard M. Leslie
RICHARD M. LESLIE, P.A.

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13. If the answer to one or more of the last five questions is in the affirmative, please state as to each affirmative answer the following:

(a) The name of the Company manufacturing, mining, marketing, distributing or selling such products.

(b) The trade or brand name of each such product mined, manufactured, distributed, marketed or sold during the period 1935 to present.

(c) The date each of such products was placed on the market.

(d) The date each of such products was withdrawn from the market.

(e) A description of the physical (the chemical) composition of each such product including the type of asbestos contained in each such product (e.g., amosite, chrysotile, or crocidolite) and the quantitative percentage of asbestos in each product.

(f) A description of the physical appearance of each such product.

(g) A detailed description of the intended use of each such product.

(h) The name of the manufacturer of each such product.

ANSWER:

Part 1: - Products manufactured by Georgia-Pacific Corporation or Bestwall Gypsum Company.

All Purpose Joint Compound

(a) Georgia-Pacific Corporation.

(b) All Purpose Joint Compound.

(c) Approximately 1967.

(d) Still available. Asbestos-free formulation introduced in 1974.

- (e) Chrysotile; approximately 4.5%
- (f) White to off-white; dry.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- (h) Georgia-Pacific Corporation.

Bedding Compound:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.
- (b) Bedding Compound.
- (c) 1956.
- (d) Still available. Asbestos-free formulation introduced in 1974.
- (e) Chrysotile; approximately 3.0% to 7.0%.
- (f) White to off-white; dry.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- (h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Central Mix:

- (a) Georgia-Pacific Corporation.
- (b) Central Mix.
- (c) Approximately 1970.
- (d) Approximately 1973.
- (e) Chrysotile; approximately 3.0% to 6.0%.
- (f) White to off-white; dry.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- (h) Georgia-Pacific Corporation.

Drywall Adhesive:

- (a) Georgia-Pacific Corporation.
- (b) Drywall Adhesive.
- (c) Approximately 1972.
- (d) Approximate 1972.
- (e) Chrysotile; approximate 0.8%.
- (f) White to off-white; dry.
- (g) The product was designed to be used to attach wallboard to wood studs.
- (h) Georgia-Pacific Corporation.

Joint Compound:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.
- (b) Joint Compound.
- (c) 1956.
- (d) Still available. Asbestos-free formulation introduced in 1974.
- (e) Chrysotile; approximately 2.5% to 6.0%.
- (f) White to off-white, dry.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- (h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Kalite:

- (a) Bestwall Gypsum Company.
- (b) Kalite.
- (c) 1956.
- (d) Approximately 1959.
- (e) Chrysotile; approximately 2.6%.
- (f) Gray and white to off-white; dry.
- (g) The product was designed as a ceiling finishing material with noise reduction properties.
- (h) Bestwall Gypsum Company.

Laminating Compound - Ready Mix:

- (a) Georgia-Pacific Corporation.
- (b) Laminating Compound - Ready Mix.
- (c) Approximately 1969.
- (d) Approximately 1969.
- (e) Chrysotile; approximately 4.0%.
- (f) White to off-white; paste.
- (g) The product was designed to conceal and reinforce

the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.

- (h) Georgia-Pacific Corporation.

Lite Acoustic:

- (a) Bestwall Gypsum Company.
- (b) Lite Acoustic.
- (c) Approximately 1958.
- (d) Approximately 1964.
- (e) Chrysotile; approximately 25% to 29.09%.
- (f) White to off-white; dry.
- (g) The product was designed as ceiling finishing

material with noise reduction properties.

- (h) Bestwall Gypsum Company.

Patching Plaster:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.
- (b) Patching Plaster.
- (c) Approximately 1956.
- (d) Still available. Asbestos-free formulation introduced in 1976.
- (e) Chrysotile; approximately 2.0%.
- (f) White to off-white; dry.
- (g) The product was designed to patch wallboard.
- (h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Ready Mix:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.

- (b) Ready Mix.
- (c) Approximately 1963.
- (d) Still available. Asbestos-free formulation introduced in 1976.
- (e) Chrysotile; approximately 1.5% to 12.0%.
- (f) White to off-white; paste.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- (h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Spackling Compound:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.
- (b) Spackling Compound.
- (c) Approximately 1956.
- (d) Approximately 1970 or 1971.
- (e) Chrysotile; approximately 5.5%
- (f) White to off-white; dry.
- (g) The product was designed to be used to fill small holes and cracks in wallboard.
- (h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Speed Set:

- (a) Bestwall Gypsum Company, Georgia-Pacific Corporation.
- (b) Speed Set.
- (c) Approximately 1962.
- (d) Still available. Asbestos-free formulation introduced in 1974.
- (e) Chrysotile; approximately 2.75% to 6.75%.
- (f) White to off-white; dry.
- (g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.

(h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Texture:

(a) Bestwall Gypsum Company, Georgia-Pacific Corporation.

(b) Ceiling Texture, Wall Texture, Certex Texture, Bestex 1, Bestex 2, Bestex A, Bestex B, Bestex C, Bestex D, Ceiling Texture - Perlite, Ceiling Texture Polystyrene and Ceiling Texture - Vermiculite.

(c) 1956.

(d) Still available. Asbestos-free formulation introduced in 1974.

(e) Chrysotile; approximately 2.0% to 22.5%.

(f) White to off-white; dry.

(g) The product was designed to provide a decorative finish to walls and ceilings.

(h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Topping Compound:

(a) Bestwall Gypsum Company, Georgia-Pacific Corporation.

(b) Topping Compound.

(c) 1956.

(d) Still available. Asbestos-free formulation introduced in 1974.

(e) Chrysotile; approximately 3.0% to 7.0%.

(f) White to off-white; dry.

(g) The product was designed to provide a decorative finish to walls and ceilings.

(h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Triple Duty Joint Compound:

(a) Bestwall Gypsum Company, Georgia-Pacific Corporation.

(b) Triple Duty Joint Compound.

(c) Approximately 1965.

(d) Still available. Asbestos-free formulation introduced in 1974.

(e) Chrysotile; approximately 2.5% to 7.0%.

(f) White to off-white; dry.

(g) The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.

(h) Bestwall Gypsum Company, Georgia-Pacific Corporation.

Part 2 - Products sold by Bestwall Gypsum Company that were manufactured by other companies.

None

Part 3 - Products sold by Georgia-Pacific that were manufactured by other companies.

Georgia-Pacific Corporation has, from time to time, sold a limited number of asbestos containing products through its Distribution Division that were manufactured by other companies. The product types were limited to conventional building products, and did not include commercial or industrial products such as industrial insulation products, fireproofing, asbestos cloth, or raw asbestos. Georgia-Pacific Corporation has maintained a large number of Distribution Centers for many years (there are currently 148 such Centers), and discretion for sales of non-G-P manufactured products has been retained at the level of the individual Distribution Center Manager. There are no centrally located records regarding sales of non-G-P manufactured products. The only records available are the sales records located at the individual branches. Those records consist principally of large volumes of sales invoices, for the most part organized chronologically by customer name.

After making reasonable inquiry, counsel represents that the only non-G-P manufactured asbestos-containing products sold through its distribution centers were as follows:

(a) Asbestos-cement board, manufactured by Johns-Manville Corporation, was sold out of one distribution center, not located in or near the state of Florida.

(b) Asphalt based roof cements and roof coatings containing asbestos, from various manufacturers, were sold at a number of distribution centers, including some sales in south Florida. Sales of these products began in approximately 1975.

(c) Asbestos siding, manufactured by Superdur Corporation, was sold out of one distribution center, not located in or near the state of Florida.

Records at the various distribution centers are extremely voluminous, and they are not segregated by product type, and therefore they have not been reviewed. It is unknown at present how complete the records are, but all records at locations relevant to this litigation will be made available to Plaintiffs' counsel upon reasonable notification.