

FILE NAME: Kaiser Gypsum (KG)

DATE: 1996

DOC#: KG046

DOCUMENT DESCRIPTION: Legal - Response to Request for Production

original to K.G. A. G.;

TT 616 -

DILLINGHAM & MURPHY
PATRICK J. HAGAN, ESQ. - BAR NO. 68264
ELIZABETH B. MORI, ESQ. - BAR NO. 178688
Fourteenth Floor
625 Market Street
San Francisco, California 94105-3315
(415) 896-0400

Attorneys for Defendant
KAISER GYPSUM COMPANY, INC.

IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

BART DOUGLAS STOCKMAN,

CASE NO.: 962298

Plaintiff,

DEFENDANT KAISER GYPSUM
COMPANY, INC.'S RESPONSE TO
PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS

vs.

ABEX CORPORATION, et al.,

Defendants.

PROPOUNDING PARTY: PLAINTIFF, BART DOUGLAS STOCKMAN

RESPONDING PARTY: DEFENDANT, KAISER GYPSUM COMPANY, INC.

SET NO.: ONE

GENERAL OBJECTIONS

Responding defendant KAISER GYPSUM COMPANY, INC.
(hereinafter referred to as "KAISER GYPSUM") hereby objects to
plaintiff's Request for Production of Documents, set number one,
served by hand on November 22, 1996, on the grounds that said
request is irrelevant, overly broad, compound, burdensome,
oppressive and harassing and it is not reasonably calculated to

1 lead to the discovery of admissible evidence. Without waiving
2 these objections, KAISER GYPSUM responds as follows:

3 RESPONSE TO REQUEST NO. 1:

4 KAISER GYPSUM incorporates its general objections as stated
5 above and specifically objects to this request as vague and
6 ambiguous as well as overly broad in terms of time and products,
7 and as to the meaning of the term "appearance." KAISER GYPSUM
8 further objects to this request as overly broad in that it
9 requests information relating to products to which the plaintiff
10 was never exposed. Without waiving said objections, KAISER
11 GYPSUM responds that it has located the documents attached as
12 Exhibit A which appear responsive to plaintiff's request and
13 which depict both asbestos-containing and non-asbestos-containing
14 products.

15 RESPONSE TO REQUEST NO. 2:

16 KAISER GYPSUM incorporates its general objections as stated
17 above and specifically objects to said request as vague and
18 ambiguous as well as overly broad in terms of time and products,
19 and as to the meaning of the term "appearance." KAISER GYPSUM
20 further objects to this request as irrelevant and not reasonably
21 calculated to lead to the discovery of admissible evidence in
22 that it requests information regarding non-asbestos-containing
23 products. Without waiving said objections, KAISER GYPSUM
24 responds that it has located the documents attached hereto as
25 Exhibit B which appear responsive to plaintiff's request. In
26 addition, to the extent that any of the documents produced
27 pursuant to Request Number 1 may be responsive to said request,
28 KAISER GYPSUM refers plaintiff to those documents.

1 RESPONSE TO REQUEST NO. 3:

2 KAISER GYPSUM incorporates its general objections as stated
3 above and specifically objects to this request as vague and
4 ambiguous as well as overly broad and unintelligible in that
5 responding defendant cannot identify which documents, if any,
6 might be responsive to said request. KAISER GYPSUM further
7 objects that in the absence of an inquiry more precisely
8 formulated, KAISER GYPSUM cannot respond to this request.
9 Without waiving these objections, KAISER GYPSUM refers plaintiff
10 to those documents produced pursuant to Requests Number 1 and 2
11 to the extent that they may be responsive to this request.

12 RESPONSE TO REQUEST NO. 4:

13 See Response to Request No. 3.

14
15 Dated: 12.12.96

DILLINGHAM & MURPHY

16
17 By:

Elizabeth B. Mori
ELIZABETH B. MORI, ESQ.

18
19 Attorneys for Defendant
KAISER GYPSUM COMPANY, INC.
20
21
22
23
24
25
26
27
28