

RECEIVED MAY 23 1988

CALIFORNIA SUPERIOR COURT
CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT NUMBER FIVE

Plaintiff,)
v.) No.
Defendants.)

GEORGIA-PACIFIC CORPORATION'S RESPONSES TO
PLAINTIFFS' STANDARD INTERROGATORIES

NOW COMES, Georgia-Pacific Corporation (hereinafter referred to as "Georgia-Pacific"), a defendant in the above-styled action, by and through its attorneys of record and responds to Plaintiffs' Standard Interrogatories as follows:

PRELIMINARY STATEMENT

Some of the events which may be relevant to the matters inquired into by these Interrogatories/Requests for Production of Documents/Requests for Admission occurred more than thirty-two (32) years ago. In addition, effective April 30, 1965, Georgia-Pacific Corporation (hereinafter referred to as either "Georgia-Pacific" or "Defendant") acquired by merger, all the assets and liabilities of the Bestwall Gypsum Company, which manufactured asbestos-containing products, and Georgia-Pacific

continued the manufacture, sale and/or distribution of such products until the cessation of the same at various times thereafter. As of 1977 Georgia-Pacific ceased the manufacture of asbestos-containing products and since that time has not engaged in any manufacture of such products. It does not now nor has it since 1977 manufactured any asbestos-containing products. As a result of the foregoing factors, many of the individuals who might have had personal knowledge of the matters to which these Interrogatories/Requests for Production of Documents/Requests for Admission relate are deceased or are otherwise unavailable to Georgia-Pacific and investigations to date indicate that at least some documents which might relate to matters inquired into by these Interrogatories/Requests for Production of Documents/Requests for Admission may have been destroyed pursuant to Georgia-Pacific's or Bestwall Gypsum Company's normal record retention policy or are otherwise unable to be found.

Georgia-Pacific is engaged in a continuing investigation in an attempt to locate or confirm the absence of such documents and is also engaged in a continuing investigation with respect to the matters inquired into by these Interrogatories/Requests for Production of Documents/Requests for Admission. Unless otherwise stated in an Answer/a Response to a specific Interrogatory/Request for Production/Request for Admission the Answers/Responses set out hereinafter are limited to the period of time during which Georgia-Pacific manufactured asbestos-containing products and to the facilities related to that business. The following is a part of and is incorporated by reference into every Answer/Response provided hereinafter:

This Answer/Response is accurate as of the date made. However, Georgia-Pacific's investigation is continuing and Georgia-Pacific cannot exclude the possibility that it may be able to obtain more complete information or even information which indicates that the Answer/Response being supplied is incorrect. Georgia-Pacific objects to answering/responding to this Interrogatory/Request for Production/Request for Admission in regard to any period of time other than the period during which it engaged in the manufacture of the asbestos-containing product(s) involved in this case, which ended in 1977, or concerning any facility not related to that business, on the basis that any such Answer/Response would be irrelevant to the subject matter of this case, would not be reasonably calculated to lead to the discovery of admissible evidence, and would be burdensome and oppressive.

1. With respect to the individual verifying these answers on your behalf, state the following:
 - a. Their name;
 - b. Their present business address;
 - c. Their present job title;
 - d. Their date of first employment with you, and the dates and titles of each job position they have held while they were employed by you.

ANSWER:

- a. Donald L. Glass.

- b. 133 Peachtree Street, N.E., Atlanta, GA 30303.
- c. Vice President - Gypsum and Roofing Division.
- d. Present Vice President - Gypsum and
Roofing Division
- 1986-1987 Vice President - Roofing Division
- 1985-1986 Vice President - International
Division
- 1982-1985 Vice President - Distribution
Division, Midwest Region
- 1978-1982 Branch Manager - Distribution
Division, Clifton, N.J.
- 1975-1978 Branch Manager - Distribution
Division, Hartford, Conn.
- 1973-1975 Distribution Division - Outside
Sales Representative, Clifton,
N.J.
- 1972-1973 Division Sales Trainee

2. Please 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 this state, and if so, the
inclusive dates of any certificate;

f. Whether or not you have a registered agent for the purpose of accepting service of process in this state, and if so, their name and present address;

g. If you are wholly owned or the majority interest of your company is owned by another business entity, state that entity's name and principal place of business.

ANSWER:

Yes.

- a. Georgia-Pacific Corporation.
- b. Georgia.
- c. 1927.
- d. 133 Peachtree Street, N.E., Atlanta, GA 30303.
- e. Yes, 1952.
- f. CT Corporation System, 800 South Figueroa Street, Suite 1000, Los Angeles, CA 90017.
- g. Not applicable.

3. Have you ever been identified, known, or done business under any other name? If so, please state name or names and the time period during which this defendant was so known or identified.

ANSWER:

- 4/27/56 to Present: Georgia-Pacific Corporation
- 4/02/51: Georgia-Pacific Plywood Co.
- 3/26/48: Georgia-Pacific Plywood and Lumber Co.
- 1/04/45: Georgia Hardwood Lumber Co.
- 9/22/27: Georgia Hardwood Lumber Co., Inc.

4. State whether you have controlled, purchased, or in any way acquired any interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold, supplied, distributed and/or otherwise placed asbestos or asbestos-containing products in the stream of commerce, and if so, state:

a. The name and address of said corporation or business entity;

b. The dates you controlled, purchased or acquired any interest; and

c. Set forth the nature of the business as it pertains to asbestos.

ANSWER:

Yes.

a. Bestwall Gypsum Company, Paoli, PA.

b. 1965.

c. Bestwall Gypsum Company was involved in the manufacture and sale of some building products which contained asbestos.

5. Since 1930, at any time did you own any shares of stock or otherwise have an ownership interest in a company that either mines, produces, or sells raw asbestos fiber? If the answer is in the affirmative, state the following?

a. The name of such corporation or entity;

- b. The date of incorporation or charter;
- c. The state or country of incorporation;
- d. Each ownership interest owned in each corporation, setting forth any change in such interest;
- e. The date such interest was acquired;
- f. The date of formation of such corporation or entity;
- g. The names of all shareholders owning more than 5% of the shares of stock of such corporation;
- h. The date such interest changed or terminated, if applicable;
- i. The name and location of each asbestos mine so owned;
- j. The grade and type of asbestos mined at each mine.

ANSWER:

Georgia-Pacific objects to this interrogatory as seeking information which is neither relevant to the subject matter of the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, to the best of our knowledge and ability to research the information requested, we can find no evidence that Georgia-Pacific has ever owned more than a small number of shares in any company that mines, produces, or sells raw asbestos fiber.

6. Please state the following:

a. The address where the corporate records of this defendant are currently located; and

b. The name, job title, and current address of the custodian for this defendant's corporate records.

ANSWER:

a. 133 Peachtree Street, N.E., Atlanta, GA 30303.

b. Diane Durgin, Vice President - Law and Secretary, 133 Peachtree Street, N.E., Atlanta, GA 30303.

7. Please state whether this defendant, between 1930 and 1985, has ever engaged in the following activities with regard to raw asbestos fiber, and if so, please state the inclusive dates of such activity:

- a. Mining;
- b. Milling;
- c. Supply;
- d. Importing;
- e. Processing;
- f. Distribution;
- g. Marketing;
- h. Sale.

ANSWER:

Georgia-Pacific has never engaged in the business of mining, milling, supplying, importing, processing, distributing, marketing and selling raw asbestos fiber.

8. Please state whether this defendant, between 1930 and 1985, has ever engaged in the following activities with regard to asbestos-containing products, and if so, please state the inclusive dates of such activity:

- a. Supply;
- b. Importing;
- c. Distribution;
- d. Marketing;
- e. Sale;
- f. Labelling;
- g. Manufacturing.

ANSWER:

Yes, 1956 - 1977.

9. If your answer to interrogatory number 7 regarding "raw asbestos fiber" is in the affirmative, please state the following:

a. The trade, brand name, and/or generic name of each such raw asbestos fiber mined, milled, supplied, distributed, processed, imported, labelled, and/or marketed in any form or quantity between 1930 and 1985;

b. The date(s) each such raw asbestos fiber was first placed on the market, including the date(s) each such raw asbestos fiber was first marketed;

i. on an experimental basis;

- ii. on a test basis; or
 - iii. for sale.
- c. The date(s) each such raw asbestos fiber;
 - i. ceased to be produced; or
 - ii. was recalled from the market, if ever.
- d. A description of the chemical composition of each such raw asbestos fiber, including the type and/or grade of asbestos;
- e. A description of the physical appearance and nature of each such raw asbestos fiber, including any color coding, distinctive marking and/or logo;
- f. A detailed description of the intended use of each such raw asbestos fiber, including any temperature limits for each such use;
- g. Whether such raw asbestos fiber was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;
- h. Whether any of this defendant's "raw asbestos fibers" have, at any time, been sold to any companies (including power companies or utilities), shipyards, distributors, refineries, suppliers and/or manufacturers in the defined geographic area. If so, please state:
 - i. The names of each such company, shipyard, distributor, supplier, manufacturer or refinery;
 - ii. The inclusive dates of each such sale, and the amount (volume) and the trade or brand name of each such raw asbestos fiber sold;

iii. Whether you have any records indicating any such sale and, if so, the name, address and job classification of each individual who currently has possession of such records.

i. Describe the types of records sufficiently to identify them for discovery purposes which set forth any of the foregoing information and the custodian thereof (giving name and address) of each such records.

ANSWER:

Not applicable.

10. If your answer to interrogatory number 8 regarding "asbestos-containing products" is in the affirmative, please state the following:

a. The trade, brand name, and/or generic name of each such asbestos-containing product sold, supplied, distributed, processed, imported, labelled, manufactured, and/or marketed in any form or quantity between 1930 and 1985;

b. The date(s) each such asbestos-containing product was first placed on the market, including the date(s) each such asbestos-containing product was first marketed:

- i. on an experimental basis;
- ii. on a test basis; or
- iii. for sale.

c. The date(s) each such asbestos-containing product:

i. ceased to be produced; or

ii. was recalled from the market, if ever.

d. A description of the chemical composition of each such asbestos-containing product, including the type and/or grade of asbestos and/or asbestos fiber contained in each such product and the quantitative percentage of asbestos or asbestos fiber in each such product;

e. A description of the physical appearance and nature of each such asbestos-containing product, including any color coding, distinctive marking and/or logo;

f. A detailed description of the intended use of each such asbestos-containing product, including any temperature limits of each such use;

g. Whether any such asbestos-containing product was on the U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

h. The name and address of the supplier's of the raw asbestos fiber used in each such product and the time period of such supply;

i. Whether any of this defendant's "asbestos-containing products" have, at any time, been sold to any companies (including power companies or utilities), shipyards, distributors, refineries, suppliers and/or manufacturers in the defined geographic area. If so, please state:

i. The names of each such company, shipyard, distributor, supplier, manufacturer or refinery;

ii. The inclusive dates of each such sale, and the amount (volume) and the trade or brand name of each such asbestos-containing product sold;

iii. Whether you have any records indicating any such sale and, if so, the name, address and job classification of each individual who currently has possession of such records.

j. Describe the types of records sufficiently to identify them for discovery purposes which set forth any of the foregoing information and the custodian thereof (giving name and address) of each such records.

ANSWER:

All Purpose Joint Compound

- a. All Purpose Joint Compound - Casein
All Purpose Joint Compound - Vinyl Base Adhesive
All Purpose Joint Compound.
- b. Approximately 1967.
- c. 1977.
- d. Approximately 4.5% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.
- g. Unknown.
- h. Phillip Carey; between approximately 1967 and 1977.

i. Georgia-Pacific objects to this interrogatory as oppressive and unduly burdensome. Without waiving its objection, Georgia-Pacific will make its records relevant to this request available for inspection by plaintiffs' counsel at the present location of those records at a time mutually convenient to all parties.

j. Memos, letters, brochures, sales and shipping records are in the custody of the law department of Georgia-Pacific, 133 Peachtree Street, N.E., Atlanta, GA 30303. Some additional records relating to sales are located at Georgia-Pacific's distribution centers located throughout the United States.

Bedding Compound

- a. Joint System Bedding Compound
 - Bedding Joint Compound
 - Bedding - Casein
 - Bedding - Vinyl Base Adhesive.
- b. 1956.
- c. 1977.
- d. Approximately 3.0% - 7.0% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.
- g. Unknown
- h. Phillip Carey and Union Carbide; between 1956 and 1977.

i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.

j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Central Mix

- a. Central Mix Joint Compound.
- b. Approximately 1970.
- c. Approximately 1973.
- d. Approximately 3.0% to 6.0% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- g. Unknown.
- h. Phillip Carey and Union Carbide; between 1970 and 1973.

i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.

j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Drywall Adhesive

- a. Drywall Adhesive.
- b. Approximately 1972.
- c. Approximately 1972.
- d. Approximately 0.8% chrysotile asbestos.
- e. White to off-white; dry.

f. The product was designed to be used to attach wallboard to wood studs.

g. Unknown.

h. Union Carbide; 1972.

i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.

j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Joint Compound

a. Joint System Cement

Joint System Compound

Wallboard Joint Compound

Joint System

Joint System Compound with Tape.

b. 1956.

c. Approximately 1976.

d. Approximately 2.5% to 6.0% chrysotile asbestos.

e. White to off-white; dry.

f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

g. Unknown.

h. Phillip Carey; between 1956 and 1976.

i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.

j. See response to interrogatory number 10(j)
concerning All Purpose Joint Compound.

Kalite

- a. Kalite
- b. 1956.
- c. Approximately 1959.
- d. Approximately 2.6% chrysotile asbestos.
- e. Gray and white to off-white; dry.
- f. The product was designed as a ceiling finishing material with noise reduction properties.
- g. Unknown.
- h. Johns-Manville; between 1956 and 1959.
- i. See response to interrogatory number 10(i)
concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j)
concerning All Purpose Joint Compound.

Laminating Compound - Ready Mix

- a. Laminating Compound - Ready Mix.
- b. Approximately 1969.
- c. Approximately 1969.
- d. Approximately 4.0% chrysotile asbestos.
- e. White to off-white; paste.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface.
- g. Unknown.

- h. Phillip Carey; 1969.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Lite Acoustical

- a. Light Acoustical
Lite - Acoustic
- b. Approximately 1958.
- c. Approximately 1963.
- d. Approximately 25.0% to 29.09% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed as a ceiling finishing material with noise reduction properties.
- g. Unknown.
- h. Johns-Manville; between 1958 and 1963.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Patching Plaster

- a. Patching Plaster.
- b. Approximately 1956.
- c. Approximately 1975.
- d. Approximately 2.0% chrysotile asbestos.

- e. White to off-white; dry.
- f. The product was designed to patch wallboard.
- g. Unknown.
- h. Johns-Manville; between 1956 and 1975.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Ready Mix

- a. Ready Mix Joint Compound
Ready Mix Topping
- b. Approximately 1963.
- c. 1977.
- d. Approximately 1.5% to 12.0% chrysotile asbestos.
- e. White to off-white; paste.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.
- g. Unknown.
- h. Phillip Carey and Union Carbide; between 1963-1977.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint compound.

Spackling Compound

- a. Spackling Compound.
- b. Approximately 1956.
- c. Approximately 1970 or 1971.
- d. Approximately 5.5% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to be used to fill small holes and cracks in wallboard.
- g. Unknown.
- h. Phillip Carey; between 1956 and 1971.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Speed Set

- a. 1-Day Wallboard Joint Compound
Speed Set Joint Compound
Speed Set - Vinyl Gypsum Adhesive
- b. Approximately 1962.
- c. Approximately 1974.
- d. Approximately 2.75% to 6.75% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

- g. Unknown.
- h. Phillip Carey and Union Carbide; between 1962 and 1974.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Texture

- a. Certex Texture
 - Bestex 1
 - Bestex 2
 - Bestex A
 - Bestex B
 - Bestex C
 - Bestex D
 - Wall Texture
 - Ceiling Texture
 - Ceiling Texture - Perlite
 - Ceiling Texture - Polystyrene
 - Ceiling Texture - Vermiculite
- b. 1956.
- c. Approximately 1974.
- d. Approximately 2.0% to 22.5% asbestos.
- e. White to off-white; dry.
- f. The product was designed to provide a decorative finish to wall and ceilings.

- g. Unknown.
- h. Phillip Carey and Union Carbide; between 1956 and 1974.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Topping Compound

- a. Joint System Topping Compound
Topping Joint Compound
Topping - Casein
Topping - Vinyl Base Adhesive.
- b. 1956.
- c. 1977.
- d. Approximately 3.0-7.0% chrysotile asbestos.
- e. White to off-white; dry.
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.
- g. Unknown.
- h. Phillip Carey and Union Carbide; between 1956 and 1977.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

Triple Duty Joint Compound

- a. Triple Duty Wallboard Joint Compound
Triple Duty Joint Compound - Vinyl Base

Adhesive.

- b. Approximately 1965.
- c. Approximately 1976.
- d. Approximately 2.5% to 7.0% chrysotile asbestos.
- e. White to off-white; dry;
- f. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.
- g. Unknown.
- h. Phillip Carey and Johns-Manville; between 1965 and 1976.
- i. See response to interrogatory number 10(i) concerning All Purpose Joint Compound.
- j. See response to interrogatory number 10(j) concerning All Purpose Joint Compound.

11. If any of the distributors identified in your answer to interrogatory numbers 9 and 10 above was an exclusive distributorship, please so state and identify the relevant time period.

ANSWER:

No, to the best of our knowledge.

12. If this defendant entered into any agreements for the rebranding of any asbestos-containing product(s) and/or material(s) mined, imported, manufactured, sold, distributed, and/or supplied by this defendant for resale or distribution by another company, describe each agreement's terms and the parties to said agreement, the duration of the agreement, and name of each product(s) and/or material(s) covered by each such agreement.

ANSWER:

A very small portion of Georgia-Pacific's asbestos-containing joint system products were rebranded for Johns-Manville, mid 1960's to early 1970's, the Flintkote Company, mid 1970's, and Big Horn Gypsum, late 1960's.

13. If this defendant entered into any agreements for the rebranding of asbestos-containing products and/or materials mined, imported, manufactured, sold, distributed, and/or supplied by another company for resale or distribution by your company, describe each of the agreements and the parties to said agreement, the terms, the duration, and the names of each product(s) and/or material(s) covered by each such agreement.

ANSWER:

Georgia-Pacific has been unable to find any information or documents in its records which relate to this interrogatory. Its investigation is ongoing and it reserves the right to supplement this answer at a later date.

14. State whether any asbestos used, processed, mined, manufactured, imported, supplied, distributed, labelled, and/or sold by this defendant was purchased from or acquired from the General Service Administration or any branch or agency of the United States government during the period 1930 to 1985. If your answer is the affirmative, state:

- a. The name and address of the agency which supplied the asbestos;
- b. The grade and types of asbestos purchased or acquired;
- c. The quantities of each type of asbestos purchased or acquired annually during the period 1930 to 1985;
- d. The means of packaging;
- e. The health warnings, if any, which accompanied each shipment of asbestos, and indicate when said warnings were first made part of the shipments.

ANSWER:

To the extent the interrogatory is requesting information concerning raw asbestos fiber, see response to interrogatory number 7.

15. As to each such asbestos-containing product listed in defendant's preceding answers to interrogatories, did defendant put on such products or their containers any warning of their hazards to health by virtue of the asbestos content of such products? If so, state for each such warning:

- a. Each such warning with particularity, with regard to size, color, and location; whether the warning was

contained on the material or on the container; whether the warning was printed, stamped, and/or placed on a tag; and nature and wording or other content. State whether you have any photographs thereof;

b. The inclusive date on which you began using each such warning on each of your asbestos-containing products; and

c. All changes you made in such warnings and the dates of such changes.

ANSWER:

Yes.

a. See Exhibit A. Warning labels for products sold in bags were printed on the back of the bags, running perpendicular to the directions for use. On products sold in container/buckets, warning labels were imprinted on the side.

b. From 1973 until asbestos was deleted from the product.

c. After a reasonable investigation, Georgia-Pacific is aware of only two changes. The first change added "Use approved respirator when sanding." The second added, "When mixing or sanding, used approved respirator." These amendments were made in approximately 1974.

16. As to any of the bags of raw asbestos fiber referred to in defendant's proceeding answers to interrogatories, did defendant put on such bags any warning of the hazards to health by virtue of the asbestos contained therein? If so, state for each such warning:

a. Each such warning with particularity, with regard to size, color, location, wording or other content; whether the warning was contained on the material or on the container; whether the warning was printed, stamped, and/or placed on a tag attached to the material or container;

b. The inclusive dates each such warning was issued on your bags of raw asbestos fiber;

c. All changes you made in such warnings, the dates of such changes, and the inclusive dates of such changes; and

d. The name, address and job title of each person who presently has possession of samples or documents relating to the above warnings;

ANSWER:

See response to interrogatory number 7.

17. With respect to each of your asbestos-containing products, state whether this defendant's name, a trademark, logos, color coding, or other identifying markings ever appeared on the actual product itself. If so, identify each such product, state when the practice to place such identifying markings upon the product was begun and when it ended, if applicable, and describe in detail the pertinent marking(s) and the purpose, if any, of such markings.

ANSWER:

No.

18. Identify all present or former executives, officers, or other supervisory officials of defendant whose depositions have been taken by plaintiffs, other than those herein, in cases involving workers or their heirs who are suing this defendant or who have sued this defendant for illnesses or injuries allegedly caused, in whole or in part, by exposure to asbestos dust allegedly created by defendant's asbestos-containing products and/or raw asbestos fibers. Identify the name of the case, the court of filing, the court docket number, and the date of the deposition.

ANSWER:

ANSWER: O. E. Burch

1. Deposed on December 6, 1983 in Mary Bennett v. National Gypsum Company, et al., Circuit Court for Pinellas County, Florida, Case Number 82-5351-20.

C. W. Lehnert

1. Deposed on April 14, 1977 in James R. Lyon v. Georgia-Pacific Corporation, et al., U.S.D.C. for Northern District of Oklahoma, Case Number 76-C-178-C.

2. Deposed on July 9, 1987 in Neta Decker, v. Armstrong World Industries, et al., District Court, Dallas County, Texas, Case Number 86-2385-D.

3. Deposed on May 13, 1987 in Dorothy Montgomery v. Georgia-Pacific Corporation, et al., U.S.D.C. Southern District of Ohio, Western Division, Case Number C-3-85-188.

4. Deposed in August 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

5. Deposed on September 4, 1987 in Michael Scavella v. Armstrong World Industries, Inc., et al., Circuit Court of Dade County, Florida, Case Number 84-45245.

6. Deposed on October 22, 1987 in Jean Vetter v. ACandS, Inc., et al., Circuit Court of Dade County Florida, Case Number 86-08409.

Harold Zelms

1. Deposed on June 25, 1985 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

Kenneth W. Brown

1. Deposed on June 25, 1985 in Shirley Tate v. Georgia-Pacific Corporation et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

James R. Hurd

1. Deposed on February 27, 1987 in Neta Decker v. Armstrong World Industries, Inc., et al., District Court of Dallas County, Texas, 95th Judicial District, Case Number 86-2385-D.

2. Deposed in August 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

Charles R. Coats

1. Deposed on April 2, 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

Brad Hollingsworth

1. Deposed in August 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

T. W. Richards

1. Deposed in August 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

Robert Favero

1. Deposed in August 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

Glenn E. Wilson

1. Deposed on October 20, 1987 in Shirley Tate v. Georgia-Pacific Corporation, et al., 46th District Court of Hardeman County, Texas, Case Number 7591.

19. Between the years 1930 to 1985, did this defendant purchase or otherwise acquire any asbestos-containing product line from another company? If so, please state for each such purchase:

- a. Date of contract of sale;
- b. Terms of purchase and sale agreement, or if you will do so without a motion to produce, attach a copy of said agreement(s) to your answers;
- c. Trade, brand, and/or generic name of each such product line so acquired;
- d. Name of company from whom you purchased each such asbestos-containing product line; and
- e. Location of any manufacturing facilities so acquired, and the type of asbestos products manufactured therein.

ANSWER:

No.

20. Identify all brochures, pamphlets, catalogs or other advertising relating to asbestos-containing products and/or raw asbestos fibers which this defendant manufactured, sold, distributed or supplied from the year 1930 to 1985. For each such document please state:

- a. A description of the document;
- b. The year it was printed;
- c. The period of time in which it was used;
- d. The purpose of such document;
- e. Whether the documents or copies of said document presently exist;

f. If said documents or copies still exist, where they are located; and

g. The name, job title, and current address of the custodian of such documents.

ANSWER:

Product brochures are available for most years in which Georgia-Pacific and Bestwall Gypsum Company's asbestos-containing products were manufactured and sold. A very limited amount of documentation still exists concerning the advertisement of these products. All documents relevant to this interrogatory are in the custody and control of the law department of Georgia-Pacific, 133 Peachtree Street, N.E., Atlanta, GA 30303.

21. Were any of the raw asbestos fibers identified in interrogatory number 9 sold, shipped or distributed to the General Services Administration (GSA)? If so, specify the type of raw asbestos fiber and state the period of time.

ANSWER:

See response to interrogatory number 7.

22. Were any of the asbestos-containing products identified in interrogatory number 10 sold, shipped or distributed to General Services Administration (GSA)? If so, specify the name of the asbestos-containing products and state the period of time.

ANSWER:

Georgia-Pacific has been unable to find any information

or documents in its records which indicates that any of its asbestos-containing products were sold, shipped or distributed to the General Services Administration. Its investigation is ongoing and it reserves the right to supplement this response at a later date.

23. Please state if you formed within your corporate structure an entity known as a "contract unit."

ANSWER:

Georgia-Pacific objects to this interrogatory on the basis that it seeks information that is neither relevant to the subject matter of the complaint nor reasonably calculated to lead to the discovery of admissible evidence; that the investigation and preparation of a response to this interrogatory would impose an undue burden and expense on Georgia-Pacific; and that the interrogatory is vague, ambiguous, overly broad and oppressive.

24. Please state whether or not any of your "contract units" were employed in the installation and/or removal of raw asbestos fiber and/or asbestos-containing products at any time in the defined geographic area for the years 1930 to 1985. If so, please state:

a. The inclusive periods of time the contract units were working in the defined geographic area;

b. The business addresses and names of the contract units;

c. Any records showing the locations of the jobsites where the contract units worked, and if so, describe them sufficiently to identify them for discovery purposes, and their present custodian;

d. Did your contract units work in any shipyards, refineries, power plants, utility companies, breweries, or other jobsites in the defined geographic area? If so, state the name of those jobsites and the dates the contract units worked at those jobsites;

e. For each jobsite listed above, state the type and nature of the work that was done.

ANSWER:

No, to the best of our knowledge.

25. From 1930 to present, did you have insurance against liability for the design, manufacture, distribution and sale of asbestos-containing products?

ANSWER:

Georgia-Pacific objects to this interrogatory on the basis that it seeks information that is neither relevant to the subject matter of the complaint nor reasonably calculated to lead to the discovery of admissible evidence; that the investigation and preparation of a response to this interrogatory would impose an undue burden and expense on Georgia-Pacific; and that the interrogatory is vague, ambiguous, overly broad and oppressive.

26. If your answer to the preceding interrogatory is in the affirmative, please state:

- a. Name and address of each insurance company;
- b. Date and number of each policy;
- c. Limits of each policy, including the deductible; and
- d. Name, address, and company position of person who has custody of each policy.

ANSWER:

See response to interrogatory number 25.

EXHIBIT A

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- BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODY HARM
- USE APPROVED RESPIRATOR WHEN
SANDING

VERIFICATION

STATE OF GEORGIA))
COUNTY OF FULTON)) ss.

I, Donald L. Glass, being first duly sworn depose and state:

That I am an officer of Georgia-Pacific Corporation, a defendant in this action; that the matters stated in the foregoing responses to interrogatories are not all within my personal knowledge and that to the best of my knowledge there is no single person who has personal knowledge of all such matters; that the facts stated in said responses have been assembled by past and present employees and counsel of the said defendant; and that I am informed and believe that said responses are true and correct.

Donald L. Glass

Subscribed to and sworn before me
this 3 day of May, 1988.

Parrell Mertz
Notary Public
Notary Public, Fulton County, Georgia
My Commission Expires June 18, 1991