
Topic

- **1 W. R. Grace**

- **1 Depositions**

- **1 Lovick**

- 1 Montana depo -

- 1 follow up with Tom Baiz, other Montana lawyers.

- 1 Thomas A. Baiz, P.O. Box 1828, Great Falls, MT 59403 (406) 727-7113

- 2 Thomas A. Kragh, 410 1st St. East, Polson, MT 69860

- 2 Al Stewart depo of Lovick -

- 1 admits to knowing many people died of mesothelioma and lung cancer and they all worked at Libby mine

- 2 tries to differentiate between work in dry mill and wet mill

- 3 dry mill and wet mill operated simultaneously. I.e., the wet mill did not function as a replacement for the dry mill.

- 4 will not admit that he thinks asbestos is a health hazard.

- **2 Junker depo**

- 1 Texas depo - can't warn blacks or they won't come to work

- 2 Weinstein depo - can't warn niggers or they won't come to work.

- 3 Martin Dyes - video depo of Junker.

- **3 Murphy the Elder**

- 1 Speights/Miller depo of Murphy

- 1 refers to 5 or 6 indices

- 2 8000 boxes of docs, reduced to 2000 now reduced to 500.

- 2 needs be be redeposed, probably serially.

- 1 pin down details of documents, numbering system at various times,

- 2 rules for inclusion and exclusion

- 1 CPD vs. non-CPD documents.

Topic

- 3 dates various acts and decisions made regarding documents.
- 4 from what locations were documents gathered
 - 1 Libby?
 - 2 S. Carolina
 - 3 Cambridge?
 - 4 Research Center?
 - 5 Overseas
 - 6 Libraries?
- 5 "Privilege" issues
- 6 Empty file folders.
- 7 Indexes, including computer index
 - 1 who created and when
 - 2 purpose for which indexes used.
- 8 microfilm story
 - 1 Greitzer and Locks letter and invoice.
 - 2 how many rolls
 - 3 what is on the microfilm
 - 4 who did the transfer
 - 5 index of microfilm documents.
- 9 Miller found 500 boxes in Cambridge "penthouse."
- 10 Approx 50 boxes regarding work comp.

● 4 Rosenberg

- 1 Alaska depo re: Otto
- 2 Redepose on Otto?
- 3 Will he open up on "reformulation" if shown Ambros dirty story?

Topic

- **5 Arthur D. Little**

- 1 Check first with Speights
 - 1 question is, do we really want this info?
 - 2 Mike Thorton to be approached.
 - 3 produce all studies, reports, correspondence to and from WRGrace,
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- **6 Brown**

- 1 WRGrace research
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- **2 General Discovery/deps/interrogs**

- **1 Insurance Personel**

- 1 internal risk management people re: comp claims
 - 1 Gladys Christ claim from Texas
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- **2 European and Australian subsidiary people**

- 1 need interrogs and doc production to further identify people, places and subjects.
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- **3 Washington Research personnel.**

- 1 Columbia, Maryland
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- **4 National Medical Division**

- 1 Dialysis labs and equipment.
 - 2 asbestos filters
 - 3 Louisiana case - argument re: venue somewhere else because there were so many National Med labs in other places.
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- **5 Davison Chemical Division**

- 1 subpoena duces tecum - docs re: asbe
 - 1 asbestos in plants - pipefitters, insulators, maintenance personel
 - 2 labelling of chemicals
 - 3 MCA labelling knowledge and info.
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Topic

- 4 warning employees re: dangerous chemicals.
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- 2 IHF membership and documents
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- 3 Holly Huart
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- 1 local counsel letter says Davison Chem docs destroyed
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- 2 Al Stewart follow up.
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• 6 **USG and NG vermiculite use**

- 1 Gypsum board.
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- 2 invoices and sales documents
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- 1 WRG
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- 2 USG and NG
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- 3 Quantities used.
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- 4 Source of vermiculite.
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• 7 **Schundler story**

- 1 Schundler bought by Manville in mid 1960s and still owned by Shuller
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- 2 Manville depository docs?
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- 3 WRG invoices re vermiculite sold to Schundler.
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• 8 **Removal of attic insulation from market but not MK.**

• 9 **Libby Montana**

- 1 discover documents in Libby
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- 2 go thru Montana Dept Health Files
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- 3 Check with Tom Baiz in Helena.
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• 3 **Documents**

• 1 **W. E. Smith - Rob check NMLRP W. E. Smith boxes.**

- 1 Rob check NMLRP W. E. Smith boxes.
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- 2 all reports etc to and from WRG
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Topic

- **2 J. C. McDonald**

- 1 raw data
- 2 all reports etc to and from WRG

- **3 Otto Ambros**

- 1 German comp claims
- 2 Edgewood documents
 - 1 Tom Crumpler.

- **4 OSHA/EPA**

- 1 submissions re: complaining about change in PEL
- 2 submissions re: tremolite inclusion in regs.
- 3 Rob - EPA fined WRG \$500,000.^{oo} for violations in destroying buildings at Libby mine with first doing abatement - WRG employees ignorant about need to perform abatement.

- **5 Empty file folders**

- 1 see, Murphy the Elder and the doc depository

- **6 Privileged docs.**

- 1 see, Murphy the Elder

- **7 WRG libraries**

- 1 research division
- 2 National Medical division.
- 3 Cambridge
- 4 Libby
- 5 expanding plants

- **4 Longo misc**

- 1 Tremolite settles to bottom of bag
- 2 videos of friability tests

Topic

- **3 “Cementitious” is misleading**

- 1 there is no cement in MK
 - 2 it is like dried mud - is subject to abrasion and becoming airborne by relatively light hand rubbing - petting the dog.
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- **4 MK compared to U.S. Mineral**

- 1 has tested both and can't say one is more friable than the other.
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- **5 Microvac technique**

- 1 now an accepted ASTM standard.
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- **6 R.J. Lee**

- 1 testifies that product is not MK
 - 2 a mystery product, with, therefore no UL rating, no code approval somehow specified for a multistory building by an architect/engineer of mysterious stupidity.
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- **7 Longo Adv.**

- 1 defuse on direct.
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- **8 WRG use of Longo**

- 1 called Longo to testify in sol case about how bad product was and therefore plaintiff should have known of problems.
 - 2 Trisek case (sp) California, Ken McClain π counsel.
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- **9 T & N docs re: testing of MK**

- **10 Purpose of asb in MK**

- 1 1958-1960, no asbestos
 - 2 1960 - , asbestos
 - 3 - now, no asbestos.
 - 4 I.e., asbestos not necessary to product, and WRG knew that before they put asbestos in MK.
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- **11 Cement products the same as MK**

- 1 Zonolite Hi temp cement
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Topic

- 2 Zonolite Finishing cement
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- **12 Longo has bags and photos of MK 3 from Embarcadero Center, San Fran, 1972-73.**
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- 1 no warnings.
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- **13**
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