

BRAYTON HARLEY CURTIS
HAND OVERNIGHT MAIL

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

IN RE:) Case No. 828684
)
 COMPLEX ASBESTOS) **GAF CORPORATION'S AMENDED**
 LITIGATION) **RESPONSES TO GENERAL ORDER NO.**
) **129 INTERROGATORIES**

**PLAINTIFF'S
EXHIBIT**

GF-863

PROPOUNDING PARTY: PLAINTIFFS
RESPONDING PARTY: GAF CORPORATION
SET NUMBER: ONE

**RESPONSE OF GAF CORPORATION TO PLAINTIFFS'
STANDARD INTERROGATORIES TO ALL DEFENDANTS**

GAF Corporation ("GAF") hereby responds to Plaintiffs' Interrogatories ("the Interrogatories") only pursuant to, under the protection of and to the extent that such requests comply with the California Code of Civil Procedure, as follows:

PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action.

The following responses are given without prejudice to GAF's right to produce, at any time, subsequently discovered evidence relating to proof of presently known material facts and to produce all evidence, whenever discovered, relating to the proof of subsequently discovered material facts. Except for explicit facts admitted herein, no admissions of any nature whatsoever are implied or should be inferred. The fact that any Interrogatory herein has been responded to

1 should not be taken as an admission or acceptance of the existence of any facts set forth or
2 assumed by such Interrogatory.

3 GAF limits its response to the period from 1928 to 1981, during which The Ruberoid Co.,
4 until its acquisition by GAF on May 26, 1967, and thereafter GAF, may have manufactured
5 asbestos-containing products.

6 GAF objects to these Interrogatories to the extent that they seek disclosure of any
7 attorney-client privileged communications or information, work product privileged information
8 and/or information protected by any other applicable privilege, and hereby asserts those doctrines
9 and privileges with respect to each Interrogatory. GAF will not supply or render information
10 protected from disclosure by virtue of such doctrines or privileges. No response herein is, or
11 shall be construed to be, a waiver of the protection provided by such doctrine or privilege.

12 GAF's failure to make any objection, either in this preliminary statement or in a specific
13 response below, through inadvertence, ignorance of facts giving rise to such objection, or for any
14 other reason, should not be considered a waiver of such objection.

15 INTERROGATORIES

16 INTERROGATORY NO.1:

17 IDENTIFY the person verifying these answers on YOUR behalf.

18 RESPONSE TO INTERROGATORY NO. 1:

19 Michael J. Baker, Assistant Secretary, GAF Corporation, 1361 Alps Road, Wayne, NJ.

20 INTERROGATORY NO.2:

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

24 RESPONSE TO INTERROGATORY NO. 2:

25 Michael Baker, presently Assistant Secretary, has been employed by GAF since May 28,
26 1982. One of his duties and responsibilities since that date has been to act as records custodian.

27 INTERROGATORY NO.3:

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

- 1 A. YOUR correct corporate name;
2 B. YOUR state of incorporation;
3 C. The date of YOUR incorporation;
4 D. The address of YOUR principal place of business;
5 E. Whether or not YOU have ever held a certificate of authority to do
6 business in the State of California, and if so, the inclusive dates of any certificate;
7 F. If YOU are wholly owned or the majority interest of YOUR company is
8 owned by another business entity, state the entity's name and principal place of business;
9 G. Whether YOU have any business offices in California, and, if so, YOUR
10 principal place of business in California.

11 RESPONSE TO INTERROGATORY NO. 3:

12 This defendant responds that GAF Corporation was incorporated in Delaware in 1929 as
13 American I.G. Corporation. Its name was changed in 1939 to General Aniline & Film
14 Corporation. From its inception until May of 1967, General Aniline & Film Corporation was not
15 engaged in any aspect of the asbestos-containing industrial thermal insulation business and, in
16 fact, manufactured no products whatsoever containing asbestos.

17 On May 26, 1967, GAF acquired The Ruberoid Co. The Ruberoid Co. was originally
18 incorporated in New York in 1886 as the Standard Paint Company. This company was
19 succeeded by a company of the same name, which was incorporated in West Virginia in 1889;
20 that company was succeeded by the Standard Paint Company, incorporated in New Jersey on
21 June 16, 1905. The name of the company was changed to The Ruberoid Co. on March 10, 1921.
22 The Ruberoid Co. began the manufacture of industrial thermal insulation products containing
23 asbestos in 1928 when it acquired the H.F. Watson Co.

24 In 1942, 98 percent of the stock of General Aniline & Film Corporation was seized,
25 pursuant to a wartime legislative enactment, by the U.S. Treasury Department which assumed
26 control over the company management and operations. In 1965, the U.S. Government
27 relinquished control over General Aniline & Film Corporation and its stock was sold at public
28 auction. In 1968, the name of the company was changed from General Aniline & Film

1 Corporation to GAF Corporation. GAF qualified to do business in California on December 18,
2 1939, which qualification was withdrawn effective December 21, 1989.

3 GAF maintains its principal place of business at 1361 Alps Road, Wayne, New Jersey
4 07470.

5 INTERROGATORY NO.4:

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

8 RESPONSE TO INTERROGATORY NO. 4:

9 See response to Interrogatory No. 3.

10 INTERROGATORY NO.5:

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

13 RESPONSE TO INTERROGATORY NO. 5:

14 See response to Interrogatory No. 3.

15 INTERROGATORY NO.6:

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

18 RESPONSE TO INTERROGATORY NO. 6:

19 Not applicable.

20 INTERROGATORY NO.7:

21 If YOU are not a corporation, please IDENTIFY all persons or other entities with an
22 ownership interest in YOU.

23 //

24 RESPONSE TO INTERROGATORY NO. 7:

25 Not applicable.

26 INTERROGATORY NO.8:

27 If you are not a corporation, please state the following:
28

1 A. The address where the HISTORICAL RECORDS of THIS DEFENDANT
2 are currently located; and

3 B. The name, job title and current address of the Custodian for THIS
4 DEFENDANTS HISTORICAL RECORDS.

5 As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating to
6 the formulation of THIS DEFENDANT, all minutes of partners, general partners, or other
7 owners' meetings, and all DOCUMENTS relating to THIS DEFENDANT's merger with,
8 acquisition of or purchase, or sale of or by any other COMPANY.

9 RESPONSE TO INTERROGATORY NO. 8:

10 Not applicable.

11 INTERROGATORY NO.9:

12 IDENTIFY YOUR custodian of Business Records.

13 RESPONSE TO INTERROGATORY NO. 9:

14 Michael J. Baker.

15 INTERROGATORY NO. 10:

16 IDENTIFY the person or persons most knowledgeable about:

17 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS
18 CONTAINING PRODUCTS;

19 B. YOUR use of RAW ASBESTOS and/or ASBESTOS-CONTAINING
20 PRODUCTS;

21 C. YOUR contracting with others to do work involving use or handling of
22 RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS.

23 RESPONSE TO INTERROGATORY NO. 10:

24 Subject to the preliminary objections, this defendant names William C. Schwingen,
25 Phillip S. Bettoli and Armen Boranian.

26 INTERROGATORY NO. 11:

27 For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING
28 PRODUCTS, state the IDENTITY of physicians, medical directors and/or industrial hygienists

1 employed by YOU during the time frame or prior to the time YOU discontinued the marketing of
2 such products. All other DEFENDANTS need only respond as to medical directors and/or
3 industrial hygienists or physicians employed in the area of employee health and safety.
4 PREMISES owners and domestic corporations need only respond as to the United States.

5 RESPONSE TO INTERROGATORY NO. 11:

6 GAF responds that it never employed a "medical director." Harry Mesler was head of
7 Corporate Safety for Ruberoid and later GAF. Mr. Mesler was succeeded by William
8 Fassuliotis, who in turn was succeeded by Charles Bien. Mr. Mesler is deceased, Mr. Fassuliotis
9 is no longer employed by GAF, and Mr. Bien is now retired. The title for the position held by
10 Mr. Bien was Corporate Manager for Safety, Security and Occupational Health.

11 INTERROGATORY NO. 12:

12 Has any employee of THIS DEFENDANT testified by deposition or at trial on behalf of
13 THIS DEFENDANT in a third-party case, in which THIS DEFENDANT was a party, wherein
14 the plaintiff has alleged an asbestos-related injury? If so, for each such third-party case (except
15 that Premises Defendants and Contractor Defendants need answer only with respect to cases
16 relating to sites within the GEOGRAPHIC AREA) please state:

- 17 A. The caption and case number,
18 B. The court filing including state and county;
19 C. The date of deposition or trial testimony;
20 D. The name and address of plaintiff's counsel of record;
21 E. The name and address of the court reporter.

22 RESPONSE TO INTERROGATORY NO. 12:

23 This defendant responds as follows:

- 24 I. The following is a list of GAF/Ruberoid personnel who have testified at either a trial or deposition in
25 personal injury or asbestos-in-buildings litigation:

<u>DEPONENT</u>	<u>CASE/DATE</u>	<u>COURT</u>
27 Herbert Abrons, Former General Counsel 28 for GAF Corp.	Richard O. Evans, et al. v. J-M Sales Corp., et al., 4/28/82	USDC of NJ

1	Michael J. Baker,	In re: All Asbestos	USDC E.D. of VA,
2	Records Retention	Cases 5/25/83	Norfolk & Newport
3	Mgr., GAF Corp.	Creed J. Stiles, et ux.,	News Divisions
4		v. J-M Sales Corp.	
5		Boyle, et al. v. Owens-	Circuit Court,
6		Corning, et al.,	Jackson County,
7		1/27/84	MO
8		Erickson, et al. v.	Superior Court, San Francisco
9		Armstrong World Industries, et al.,	County, CA
10		2/22/84	
11		In re: Massachusetts	USDC of MA
12		Asbestos Litigation,	
13		2/28/84	
14		Haugh v. Raymark, et al.	Court of Common
15		10/15/84	Pleas,
16			Philadelphia, PA
17		Jestine Roberts v. JM,	Superior Court,
18		et al., 7/6/85	Union County, NJ
19		In re: Sparrows Point	USDC of MD
20		Steel Plant Asbestos	
21		Cases, 11/26/85	
22		State of Maryland v.	Circuit Court, Anne Arundel
23		Keene Corp., et al	County, MD
24		4/6/87	
25		Ella Parker for Harry	Circuit Court,
26		Parker v. Bell Asbestos	Mobile, AL
27		Mines, et al., 2/25/93	
28		Mayor & City Council	Circuit Court,
29		of Baltimore v. Keene	Baltimore City,
30		Corp., et al., 12/17/93	MD
31	Norbert Baumstart,	Hubert Hayes, et al.	USDC E.D. of MO
32	Former Purchasing/Traffic	v. J-M Sales Corp., et	
33	at St. Louis Plant	al., 10/27/81	
34	//		
35	Salvatore C. Bellini,	Baltimore City	Circuit Court,
36	Dir. of Internal Audit	Consolidation, 7/30/92	Baltimore City,
37		Dept.	MD
38			
39	Jonathan Berger,	Richard Evans, et al.,	USDC of NJ
40	Former Vice President of	v. J-M, et al., 1/4/82	
41	Human Resources at		
42	GAF Corporation		

1	Phillip S. Bettoli,	Virgil E. Ballinger,	Circuit Court,
2	Retired, Technical	et ux. vs. Combustion	Knox County, TN
3	Director of GAF	Bruce Alfred Nave, et	
	Corporation 1967-80	ux., 1/28/77	
4		Hattie S. Thornton v.	Virginia Circuit
		J-M Corp., et al.	Court, City of
5		Samuel E. Hershman v.	Portsmouth, VA;
		J-M Corp., et al.	Court of Common
6		Esther Bailey v. J-M	Pleas, Greenville,
		Corp., et al.	SC
7		David C. Durham, et al.	
		v. J-M Corp., et al.,	
8		9/7/77; 3/8/78	
9		Ida Baltz v. J-M Sales	USDC E.D. of MO
		Corp. et al., 4/25/80;	
10		5/16/80	
11		Stice v. GAF Corp.,	USDC of MD
		et al., 5/26/83	
12		Pyne v. Baldwin-Ehret-	Superior Court,
13		Hill, 8/14/84	Middlesex County,
			NJ
14		Funseth v. Fibreboard,	Superior Court,
15		11/7/84	San Francisco
			County, CA
16		Earl R. Nutt, et al. v.	Superior Court,
17		AC&S, Inc., et al.,	New Castle County,
		10/10/85	DE
18		William J. Kornegary,	USDC S.D. of TX
19		11/14/85; 12/17/85	
20		Dorothy St. Jacque, et	Superior Court,
21		al. v. J-M Corp., et al.,	Los Angeles County,
		7/2/86; 10/29/86	CA
22		Lee v. American Cyanamid	Superior Court, NJ
		and Sholtis v. American	
23	//	Cyanamid, 8/13/87	
24		Harry Parsysz, et al. v.	USDC S.D. of FL
25		Armstrong World Industries,	
		et al., 2/29/88	
26		University System of	USDC of NH
27		New Hampshire v.	
		National Gypsum Co.,	
28		9/28/88	
		Laurie Williams v.	Superior Court,

1	Fibreboard, et al.,	King County, WA
2	4/28/89; 8/2/89	
3	Joseph R. Theer, et al.	
4	v. Celotex, et al.,	
5	10/2/90	
6	Baltimore City	Circuit Court,
7	Consolidation, 2/12/91;	Baltimore City,
8	3/19/91	MD
9	In re: State of West	Circuit Court,
10	Virginia Public Buildings,	Monogalia County,
11	3/29/91	WV
12	In Re: Asbestos Cases	Circuit Court,
13	(Kanawha County Mass I),	Kanawha County,
14	7/19/91	WV
15	Baltimore City Consoli-	Circuit Court,
16	dation, 5/19/92	Baltimore City, MD
17	Mayor & City Council of	Circuit Court,
18	Baltimore v. Keene Corp.,	Baltimore City, MD
19	et al., 8/19/92	
20	Charles F. Bien,	USDC E.D. of MO
21	Retired, Chief	
22	Environmental Engineer	
23	at GAF Corp., Wayne, NJ	USDC of NJ
24	Ida Baltz v. J-M Corp.,	
25	et al., 8/7/80	
26	Richard Evans, et al.,	USDC of NJ
27	v. J-M, et al., 1/13/82	
28	Lee v. Carey-Canada,	USDC of NJ
29	5/9/84	
30	In re: Promaulayko and	Superior Court,
31	and Other Consolidated	Middlesex County,
32	Matters, 5/9/84	NJ
33	Armen G. Boranian,	USDC of CO
34	Former Manager,	
35	Floor Tile Group at	
36	GAF Corp.	
37	Adams-Arapahoe School	
38	Mfrg. District No. 28J v.	
39	Celotex Corp., et al.,	
40	11/10/87; 10/29/90	
41	//	
42	St. Vrain Valley S.D.	USDC of CO
43	v. W.R. Grace, et al.,	
44	10/13/89; 6/25/91; 7/2/91	
45	John L. May, Archbishop	USDC E.D. of MO
46	of St. Louis, et al. v.	
47	AC&S, et al., 4/14/92,	
48	4/15/92, 4/16/92	
49	V. Robert Canfield,	Superior Court,
50	Daniel Frank v. GAF,	

1	Manager, R&D, GAF Corp.	et al., 10/17/91	Ocean County, NJ
2	Patricia M. Corbutt, Former Assistant Secretary, GAF Corporation	Elizabeth C. Morris, Indiv. and as Co- Executor of the Estate of Fred Lavell Morris, Douglas Morris and Patricia Morris v. J-M Sales Corp., 3/23/83	Superior Court, City and County of San Francisco, CA
6	Philip Dalton, Retired, Former President of GAF	Richard O. Evans, et al. v. J-M Corp., et al., 4/23/82	USDC of NJ
9	Theodore E. Dean, Mgr., Technical Services	Dorothy St. Jacques, et al. v. JM Corp., et al., 12/20/83	Superior Court, Los Angeles County, CA
11		St. Vrain Valley S.D. v. WR Grace, et al., 6/19/91	USDC of CO
13	Leo J. Faneuf, Former Vice President and Director of Manufac- turing and Building Materials at GAF	Hubert Hayes, et al. v. J-M Sales Corp., et al., 4/28/82	USDC E.D. of MO
15		Richard O. Evans, et al. v. J-M Sales Corp., et al., 4/28/82	USDC of NJ
17		Balderman v. GAF, et al., 5/3/84	Superior Court, Camden County, NJ
18	William Fassuliotis, Former Director of Safety & Occupatn'l Health at GAF Corp.	All Philadelphia Naval Shipyard Cases-Eleanor Van Buskirk v. GAF Corp., 11/26/79	USDC E.D. of PA
21		Forest, Baltz & Smith v. J-M Sales Corp., et al., 12/14/79	USDC E.D. of MO
23	George R. Ferment Former Technical Director, Floor Tile Group at GAF	Dorothy St. Jacques, et al. v. J-M Corp., et al., 12/20/83	Superior Court, Los Angeles County, CA
25	Richard F. Fisanick, Former Supervisor, Office Services South Bound Brook	Promaulayko, et al. v. J-M Corp., et al., 4/24/84	Superior Court, Middlesex County, NJ
27	Eugene Flood, Former Plant Mgr., Gloucester, NJ The Ruberoid Co.	Elizabeth Martorano, et ux. v. GAF, 8/26/81	USDC E.D. of PA

1	R. Power Fraser,	Anthony & Ellen Grugan	Court of Common
2	Jr., Former V.P. and	v. J-M Corp., et al.,	Pleas, Philadelphia, PA
3	General Manager of	12/14/78	
4	Industrial Products		
5	Division of GAF Corp.		
6	Guy C. Freeman,	Port Authority of New	USDC S.D. of NY
7	Regional Mgr., Technical	York and New Jersey and	
8	Services, GAF Corp.	Port Authority Trans-	
9		Hudson Corp. v. Allied	
10		Corp., et al., 4/13/92	
11	Thomas F. Gedettis,	Richard O. Evans, et al.	USDC of NJ
12	Retired Manager of	v. J-M Corp., et al.,	
13	Manufacturing Roof	4/29/82	
14	and Granule at GAF		
15	Jack Gow,	Richard O. Evans, et al.	USDC of NJ
16	Former Senior Vice	v. J-M Corp., et al.,	
17	President (Personnel	4/29/82	
18	Relations) at GAF		
19	Joseph G. Hall,	Anthony & Ellen Grugan	Court of Common
20	Former Senior Vice	v. J-M Corp., et al.,	Pleas, PA
21	President, Building	12/20/78	
22	Materials Div., GAF Corp.		
23		Forest, Baltz & Smith	USDC E.D. of MO
24		v. J-M Sales Corp., et	
25		al., 12/14/79	
26	Richard W. Henry,	Joseph G. Clune v. J-M	USDC E.D. of PA;
27	Decd., Market	Corp., et al. and All	Court of Common
28	Manager for	Philadelphia Naval	Pleas, Philadelphia
29	Calsilite Products,	Shipyard Cases, 6/12/80	County, PA; USDC
30	The Ruberoid Co.		E.D. VA
31		Ida Baltz v. J-M, et al.,	USDC E.D. of MO
32		9/25/80	
33		Biagio Leopanto for George	Court of Common
34		Blair, etc., v. GAF, et al.,	Pleas, Philadelphia, PA
35		4/22/87	
36	//		
37	Jack Holloway,	Richard O. Evans, et	USDC of NJ
38	Environmental Engi-	al. v. J-M Corp., et al.,	
39	neer in Wayne, NJ	4/15/82	
40	at GAF Corp.		
41		Marsden, et al. v. J-M	USDC of NJ
42		Corp., et al., 5/19/82	
43	James J. Iaquinto,	Anthony & Ellen Grugan	Court of Common
44	Former Manager of	v. J-M Corp., et al.,	Pleas, Philadelphia, PA

1	Sales Administration	12/20/78	
2	of the Industrial		
3	Products Division of		
4	GAF Corp.		
5	Howard F. Johnston,	Hubert Hayes, et al.	USDC E.D. of MO
6	Retired as Personnel	v. J-M Sales Corp., et	
7	Manager of Chemical	al., 3/26/82	
8	Group Manufacturing		
9	in Bound Brook, NJ		
10	Harry H. Kaufman,	Hubert Hayes, et al.	USDC E.D. of MO
11	Retired as Assistant	v. J-M Sales Corp., et	
12	Director of Quality	al., 3/29/82	
13	Control in South		
14	Bound Brook, NJ	Richard O. Evans, et al.	USDC of NJ
15		v. J-M Corp., et al.,	
16		3/30/82	
17	Robert Klein,	Hubert Hayes, et al. v.	USDC E.D. of MO
18	Controller for	J-M Sales Corp., et al.,	
19	Building Materials	3/22/82	
20	Group at GAF Corp.		
21	Elmer L. Krusa,	Port Authority of New	USDC S.D. of NY
22	NY District Field	York and New Jersey and	
23	Sales Mgr., GAF Corp.	Port Authority Trans-	
24		Hudson Corp. v. Allied	
25		Corp., et al., 4/13/92	
26	Stanley L. Leach,	In re: Shipyard &	Superior Court,
27	Former V.P. of Sales,	Applicator Asbestos	Alameda County, CA
28	Vermont Asbestos Group	Cases, 2/24-2/25/86	
29		Asbestos Litigation,	Superior Court,
30		7/1/86	Middlesex County,
31			NJ
32	Jack Lee,	Dorothy St. Jacque, et	Superior Court,
33	Former General Product	al. v. Owens-Corning	Los Angeles County,
34	Manager at GAF Corp.	Fiberglass 5/13/83	CA
35	Charles Limerick,	Oral Forrest, et al.	USDC E.D. of MO
36	Former Vice Presi-	v. JM, 12/28/79	
37	dent of Operations		
38	for Ruberoid	Florence Ubben v. J-M	USDC E.D. of MO
39		Sales Corp., et al.,	
40		11/19/81	
41			
42		In re: All Asbestos	USDC E.D. of VA
43		Cases, 5/24/83	
44			
45		Biagio Leopanto for George	Court of Common
46		Blair, etc. v. GAF, et al.,	Pleas, Philadelphia,
47		4/23/87	PA

1	Bernard J. Lokuta, Former Staff Engineer of Technical Services at GAF Corporation	John L. Underwood v. UIP Engineered Products, 9/10/81; 3/11/83	State Court, Chatham County, GA
2			
3	Alice M. Luongo, R.N., Nurse at South Bound Brook	In re: Promaulayko, etc., 7/24/85	Superior Court, Middlesex County, NJ
4			
5	Lawrence E. Lyons, Purchasing Specialist in Wayne, NJ	Hubert Hayes, et al. v. J-M Sales Corp., et al., 12/3/81; 3/22/82	USDC E.D. of MO
6			
7	Anthony J. Marchetta, Esq.	Martorano v. GAF Corp., et al., 4/15/85	USDC E.D. of PA
8			
9	Thomas P. Martin, Former Director, Corporate Safety	Clayton Center Associates, et al. v. W.R. Grace, et al., 10/3/91	Circuit Court, St. Louis, MO
10			
11	Ellis R. Mirsky, Esq., Former VP of Litigation	Baltimore City Consolidation, 7/31/92	Circuit Court, Baltimore City, MD
12			
13	Louis T. Menapace, Former Supervisor of Sales, The Ruberoid Co.	In re: Promaulayko, etc., 2/28/85	Superior Court, Middlesex County, NJ
14			
15	Michael T. Messel, Former Mine Manager, Vermont Mine	Charles Lee Austin, et al. v. JM, et al., 8/18/80; 8/19/80	USDC of NJ
16			
17		Clayton Brass, et al. v. Asbestos Corp., Ltd., et al., 1/15/87	Superior Court, Quebec, Montreal
18			
19	Wilbur G. Neel, Former Director of Sales/Trade Relations of	Cochran, Sullivan v. J-M Corp., 6/17/80	Superior Court, CA
20	Asbestos Fibre and Industrial Insulation at GAF Corp.	Phelps v. Fibreboard American Smelting & Refinery Cross-D's 2/2/81	Superior Court, CA
21			
22			
23		Hubert Hayes, et al. v. v. J-M Sales Corp., et al., 3/9/82	USDC E.D. of MO
24		M. Meyers v. J-M Sales Corp., et al., 3/9/82	USDC E.D. of MO
25			
26		Norman Banks v. J-M Sales Corp., 9/22/83	Superior Court, CA
27	William Nelson, Former Manager of St. Louis Plant	Ida Baltz v. J-M Sales Corp., et al., 3/28/80	USDC E.D. of MO
28		Hubert Hayes, et al. v. J-M, et al., 11/16/81	USDC E.D. of MO

1	John G. O'Brien,	Los Angeles Unified School	Superior Court,
2	Former Senior Counsel,	District v. Owens-Corning,	Los Angeles County,
3	GAF Corporation	et al., 4/25/86	CA
4		Leroy Hall v. Lac D'Amiante	USDC E.D. of PA
5		du Quebec, et al., 10/21/86	
6		Tommie L. Heathman,	USDC of TX
7		et ux. v. Owens-Corning,	
8		et al., 8/9/89	
9	E.J. O'Leary,	Hubert Hayes, et al.	USDC E.D. of MO
10	Retired, Former Presi-	v. J-M Sales Corp.,	
11	dent of Ruberoid and	et al., 3/29/82	
12	member of Board of		
13	Directors of GAF	Richard O. Evans,	USDC of NJ
14		et al. v. J-M Corp.,	
15		et al., 3/30/82	
16	Wayne H. Page, Former	Ida Baltz v. J-M Sales	USDC E.D. of MO;
17	Vice President,	Corp., et al., 9/7/77;	Court of Common
18	Manufacturing of	10/22/80	Pleas, Greenville,
19	Consumer Products		SC
20	Group of GAF Corp.		
21		Eleanor Van Buskirk, et	USDC of PA
22		al. v. Carey Canadian	
23		Mines, Ltd., et al. and	
24		All Philadelphia Naval	
25		Shipyard Cases and Va.	
26		Consolidated Proceedings	
27		11/27/79	
28		Dorothy C. Balderman,	Superior Court,
29		et. al v. GAF, 3/14/84	Camden County, NJ
30		Biagio Leopanto for George	Court of Common
31		Blair, etc. v. GAF, et al.,	Pleas, Philadelphia,
32		4/87	PA
33			
34	Clell Pickens,	Hubert Hayes, et al.	USDC E.D. of MO
35	Former Supervisor	v. J-M Sales Corp.,	
36	of St. Louis Plant	et al., 11/21/81	
37			
38	John F. Rebele,	Baltimore City	Circuit Court,
39	Controller, GAF	Consolidation, 8/3/92	Baltimore City, MD
40	Bldg. Materials Corp.		
41	Dominic S. Sandora,	Fred Eppler, et al.,	Superior Court,
42	Retired, Mfg., Shipping	v. JM, et al.,	Middlesex County,
43	& Receiving, GAF	4/26/83	NJ
44			
45	Louis Sarlo,	Banks v. GAF,	NJ, Dept. of Labor
46	Former Mfg. Coordinator	8/10/76	& Industry, WC Div.
47	for GAF Corp.,		
48	Gloucester, New Jersey	Joseph G. Clune v. J-M	USDC E.D. of VA;
49		Corp., et al., 5/1/80	USDC E.D. of PA

1	Louis J. Fitzgerald v.	NJ Dept. of Labor
2	Brand Insulations,	& Industry
3	Phila. Asbestos Corp.,	
	J.J. White Corp. etc.,	
	9/14/81	
4	Richard O. Evans,	USDC of NJ
5	et al., v. J-M et al.,	
	1/13/82; 1/5/83	
6	Robert A. Smith v.	Court of Common
7	Celotex, et al.,	Pleas, Philadelphia
	2/11/86	PA
8	Biagio Lopanto for George	Court of Common
9	Blair, etc. v. GAF, et al.,	Pleas, Philadelphia
	4/23/87	PA
10	Arnold Schwartz,	Superior Court,
11	Engineer at Linden	Middelsex County,
	Plant, GAF Corporation	NJ
12	William C. Schwingen,	<u>Consolidated Cases</u>
13	V.P., Technical Services,	Virgil E. Ballinger,
14	GAF Building Materials	et ux. v. Combustion
	Corp.	Engineering, Inc., et
		al., 1/29/77
15	Virgil E. Ballinger,	Circuit Court,
16	et ux. v. Combustion	Knox City, TN;
	Engineering, Inc., et	USDC E.D. of TN
	al., 9/7/77	
17	Virgil E. Ballinger,	State of South
18	et ux. v. Combustion	Carolina, City
	Engineering, Inc., et	of Greenville
	al., 9/7/77	
19	Dolores M. Moran v. J-M	USDC N.D. of OH
20	et al., 4/81	
21	Hubert Hayes, et ux. v.	USDC of MO
22	J-M Sales Corp., et al.	
23	v. Lac D'Amiante Du	
24	Quebec, LTEE vs. GAF	
25	Corp., 3/25/82	
26	Eve Lorraine Marks, et	USDC E.D. of TX
27	al. v. Fibreboard Corp.,	
	et al., 7/21/82	
28	Doan v. J-M, et al.,	Court of Common
	10/13/82; 7/12/88	Pleas, Cuyahoga
		County, OH
29	In re: All Asbestos	USDC E.D. of VA
30	Cases, Creed J. Stiles,	
31	et ux. v. J-M Sales	
32	Corp., 5/25/83	
33	Arrendondo v. J-M,	USDC S.D. of TX,

1	6/4/83	Houston Division
2	Earl R. Nutt, et al. v.	Superior Court,
3	A.C. & S., et al.,	New Castle County,
4	12/5/83; 6/28/84	DE
5	Balderman v. J-M Sales	Superior Court,
6	Corp., 12/15/83	Camden County, NJ
7	RE: Gloucester Plant	
8	Workers	
9	Williams v. Fibreboard,	Circuit Court,
10	1/27/84	Jackson County, MO
11	Massachusetts Asbestos	USDC of MA
12	Cases, 3/12/84	
13	Earl Patterson, etc.	USDC of MD
14	v. GAF and A.C.&S., Inc.,	
15	3/13/84	
16	Press, etc. v. J-M	Court of Common
17	Corp., 4/25/84	Pleas, Philadelphia,
18		PA
19	In re: Promaulayko,	Superior Court,
20	5/9/84	Middlesex County,
21		NJ
22	Broszeit v. GAF	Court of Common
23	Corporation, 5/16/84	Pleas, Philadelphia,
24		PA
25	Walter Hanna, et ux.	Court of Common
26	v. J-M Corp., et al.,	Pleas, Philadelphia,
27	7/23/84	PA
28	John Haugh, et ux., v.	Court of Common
29	Raymark, et al.,	Pleas, Philadelphia
30	10/15/84	PA
31	Kathryn Guidry,	Court of Common
32	Executrix of the Estate	Pleas, Philadelphia,
33	of Gilbert Guidry v.	PA
34	GAF, 10/15/84	
35	Case name unknown,	Unknown
36	11/28/84	
37	Hosea v. Standard	USDC S.D. of TX,
38	Insulation, 12/12/84	Houston Division
39	Dellomo v. Keene, 1/9/85;	Court of Common
40	1/15/85	Pleas, Philadelphia,
41		PA

1	In re: Asbestos School	USDC E.D. of PA
2	Litigation, 1/15/85;	
3	8/23/88	
4	Babich, etc., v. EP,	Superior Court,
5	et al., 7/24/85; 8/1/85	Middlesex County,
6		NJ
7	Consolidated Asbestos	Circuit Court,
8	Cases, 11/20/85	Duval County, FL
9	Robert A. Smith v.	Court of Common
10	Celotex, et al.,	Pleas, Philadelphia,
11	2/11/86	PA
12	McCarty, et al. v.	USDC S.D. of MS
13	J-M Sales Corp., et al.	
14	10/7/86	
15	University System of	USDC of NH
16	New Hampshire v.	
17	National Gypsum Co.,	
18	et al., 7/28/88; 9/28/88	
19	In re: Asbestos School	USCD E.D. of PA
20	Litigation National	
21	Schools Class Action,	
22	8/23/88	
23	State of Maryland v.	Circuit Court,
24	Keene Corp., et al.,	Anne Arundel
25	6/2/89	County, MD
26	Geoffrey D. Spinks, et ux.	USDC of D.C.
27	v. Celotex Corp., et al.,	
28	2/8/90	
29	In re: State of West	Circuit Court,
30	Virginia, 3/27/91	Monogalia County,
31		WV
32	Baltimore City	Circuit Court,
33	Consolidation, 4/18/91;	Baltimore City, MD
34	5/19/92	
35	Ivy Laurie for George	Court of Common
36	Laurie v. JM, et al.,	Pleas, Philadelphia,
37	4/24/91	PA
38	Tommie Heathman, et ux.	District Court,
39	v. OCF, et al., 6/21/91	Brazoria County,
40		TX
41	Port Authority of New York	USDC S.D. of NY
42	and New Jersey and Port	

1	Authority Trans-Hudson	
2	Corp. v. Allied Corp., et	
	al., 4/14/92	
3	Virginia Philbrook, etc. v.	District Court,
4	Fiberboard Corp., et al.,	Harris County, TX
	5/21/92	
5	June A. Behrendt for	Court of Common
6	Otto E. Behrendt v.	Pleas, Dauphin
	GAF, et al., 6/4/92	County, PA
7	Mayor & City Council of	Circuit Court,
8	Baltimore v. Keene Corp.,	Baltimore City, MD
	et al., 7/28/92	
9	Virginia M. Jackson for	Superior Court,
10	Elson S. Jackson, et al.,	MA
	v. OCF, et al., 3/9/93	
11	Jack White v. Celotex,	Circuit Court,
12	et al., 7/13/93	Knox County, TN
13	In Re: Asbestos (Kanawha	Circuit Court,
	County Mass III), 7/22/93	Kanawha County,
14		WV
15	Virgil Armel, et al., v.	Circuit Court,
16	GAF, et al. (VA ABEX	Winchester, VA
	Plantworker Cases),	
	10/25/93	
17	Mike Norman v. A-C	Circuit Court,
18	Product Liability Trust,	Wayne County, MI
	et al., 12/8/95	
19	Herbert Stoudt,	Superior Court,
20	Former Technical	San Francisco,
	Information	CA
21	Supervisor at GAF Corp.	
22	Hazel Sutton,	USDC of MO
	Former Cost Accountant	
23	at the St. Louis Plant	
	Hubert Hayes, et al.	
	v. J-M Sales Corp.,	
	et al., 3/9/82	
24	Phillip Teague,	USDC E.D. of MO
25	Former Plant Manager	
	of St. Louis Plant	
	Forrest v. J-M Sales	
	Corp., 12/20/79	
26	Hubert Hayes, v.	USDC E.D. of MO
27	J-M Sales Corp., et	
	al., 11/13/81	
28	Harold James Vickery,	USDC of NJ
	Former Safety Coordinator et al. v. J-M Corp.,	

1 for GAF Corp. et al., 11/12/81

2 II. The following is a list of GAF/Ruberoid personnel who have testified before or submitted statements to
3 Congressional committees:

4 Robert A. Beber, Written testimony dated 6/14/83 before the
Executive V.P., General Subcommittee on Labor Standards of the Committee
5 Counsel and Secretary, on Education and Labor on H.R. 3175
GAF Corporation

6 Testimony of Beber and Daniel H. Williams on 7/27/83 before the Subcommittee on
Education and Labor, U.S. House of Representatives, 98th Cong., on H.R. 3175, the
7 "Occupational Disease Compensation Act of 1983"

8 Testimony presented on 5/21/84 on the Occupational Disease Compensation Act of 1983
before a House Subcommittee on Labor and Human Resources

9 Philip S. Bettoli, Statement on 2/15/72 and 2/16/72 before U.S. Environmental
Retired, Technical Protection Agency, Public Hearing on National Emissions
10 Director, GAF Standards for Hazardous Air Pollutants
Corporation, 1967-80

11 Joseph G. Hall, Testimony on 3/14/72 before U.S. Department of
12 V.P., GAF Corporation Labor in the Matter of Standard for Exposure to Asbestos Dust

13 Edward E. Shea, Testimony presented on 4/23/85 to a House
Senior V.P., General of Representatives Subcommittee on H.R. 1626
14 Counsel and Secretary,
GAF Corporation

15 Statement for the Record dated 5/15/86 on S.2083 (AHRA) and S.2300 before the
Toxic Substances and Environmental Oversight Subcommittee on Environment and
16 Public Works

17 Paul I. Weiner, Esq. Statement for the record dated 3/22/72 of GAF
GAF Corporation Corporation in the Matter of Standard for Exposure to Asbestos Dust, submitted to the
18 U.S. Department of Labor

19 INTERROGATORY NO. 13:

20 For each of the following, please state whether, at any time within the time frame or until
21 such time as any defendant which had been engaged in MARKETING RAW ASBESTOS or
22 ASBESTOS-CONTAINING PRODUCTS discontinued the MARKETING of such products,
23 THIS DEFENDANT was a member or paid dues for any representative of THIS DEFENDANT
24 (excluding faculty members of educational institutions) to be a member of the following:

25 A. American Conference of Governmental Industrial Hygienists;

26 B. American Industrial Hygiene Association;

27 C. American Petroleum Institute;

28 D. American Railroad Association;

- 1 E. Asbestos Cement Producers Association;
- 2 F. Asbestos Information Association (AIA)(please answer through date of your
- 3 answers);
- 4 G. Asbestos Information Association/North America (AWNA)(please answer
- 5 through date of your answers);
- 6 H. Asbestos Textile Institute (ATI);
- 7 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);
- 8 J. Industrial Mineral Insulation Manufacturers Institute;
- 9 K. Magnesia Insulation Manufacturers' Association;
- 10 L. Magnesia Silica Insulation Manufacturers Association;
- 11 M. Mineral Wool Institute;
- 12 N. National Insulation Manufacturers Association (NIMA);
- 13 O. National Safety Council;
- 14 P. New York Academy of Sciences;
- 15 Q. Quebec Asbestos Mining Association (QAMA);
- 16 R. Refractories Institute;
- 17 S. Safe Building Alliance (please answer through date of your answers);
- 18 T. Thermal Insulation Manufacturers Association (TIMA);
- 19 U. U.S. Maritime Commission;
- 20 V. IDENTIFY any other organizations, associations or groups of manufacturers,
- 21 miners, distributors, importers, labelers, suppliers, and/or sellers of ASBESTOS-CONTAINING
- 22 PRODUCTS of which THIS DEFENDANT was a member;
- 23 W. IDENTIFY any such representative of THIS DEFENDANT.

24 RESPONSE TO INTERROGATORY NO. 13:

25 This defendant responds that it was a member of the following industrial groups or

26 organizations:

27 National Insulation Manufacturers' Association, Inc.
28 441 Lexington Avenue
New York, New York 10017
1958-1971

1 Thermal Insulation Manufacturers' Association, Inc.
2 Seven Kirby Plaza
3 Mount Kisco, New York 10549
After 1973 - approximately 1978

4 Asbestos Information Association/North America
5 1745 Jefferson Davis Highway, Suite 509
Arlington, Virginia 22202
6 1971-1977

7 National Safety Council
8 444 N. Michigan Avenue
Chicago, Illinois 60611
Prior to 1966 - 1981

9 American Society for Testing Materials
10 1916 Race Street
Philadelphia, Pennsylvania 19103
11 Approximately 1946 - 1981

12 Asbestos Cement Products Association
Approximately 1937-1964

13 Mineral Products Fiber Bureau
14 1964 - approximately 1971

15 Resilient Floor Covering Institute
16 f/k/a Asphalt & Vinyl Asbestos Tile Institute
Suite 12-B
17 966 Hungerford Drive
Rockville, Maryland 20805
1959-1981

18 National Roofing Contractors Association
19 Associate Member
Chicago, Ill.

20 This defendant is aware of documents, neither generated by nor in the custody and
21 control of this defendant, reflecting that General Aniline & Film Corporation was a new member
22 of the Industrial Hygiene Foundation during the years 1945 to 1947, a period when General
23 Aniline & Film Corporation was under government ownership and did not manufacture any
24 asbestos-containing materials. Although certain documents appear to indicate that Ruberoid
25 considered becoming a member for a limited period in 1953-1954, this defendant possesses no
26 evidence that it ever did so.

27 INTERROGATORY NO. 14:
28

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

- 3 A. The dates during which THIS DEFENDANT was a member;
4 B. The name(s) of any publication(s) received by THIS DEFENDANT from
5 such association or organization;
6 C. The name of any committee or subcommittee of which THIS
7 DEFENDANT was a member, and the dates of such committee or subcommittee membership.

8 RESPONSE TO INTERROGATORY NO. 14:

9 This defendant states that Ruberoid and then GAF representatives were members, along
10 with representatives of the United States Navy, of standard-setting groups and committees of the
11 American Society of Testing Materials, Philadelphia, Pennsylvania ("ASTM"). Specifically,
12 Ruberoid/GAF representatives served on subcommittee C-16, which dealt with high temperature
13 thermal insulation, from 1950 until 1971. At various times in this period, this defendant's
14 representatives on subcommittee C-16 were J.M. High, Thomas J. Walters, Duane A. Davis, and
15 William C. Schwingen.

16 Ruberoid and then GAF was also a member of the National Insulation Manufacturers'
17 Association for certain years between 1958 and 1971. Wilbur G. Neel at some point in the
18 1960's was a member of the Board of Directors of NIMA and attended a meeting in 1964.

19 During the 1970's, representatives of GAF were members of the Board of Directors of the
20 Asbestos Information Association/North America. Among persons so serving were Frank
21 Campagna, Joseph Hall and William Fassuliotis. GAF is aware of documentation indicating that
22 it was a member of the ACPA Health and Safety Council in the late 1960s.

23 //

24 INTERROGATORY NO. 15:

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

1 A. Either (1) attach all DOCUMENTS evidencing the information sought in
2 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
3 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
4 may be made the subject of a request for production of documents.

5 B. State the date upon which THIS DEFENDANT first received such
6 DOCUMENTS;

7 C. State the IDENTITY of the custodian of such DOCUMENTS.

8 D. This INTERROGATORY does not apply to DOCUMENTS contained in a
9 library maintained by a DEFENDANT hospital or a DEFENDANT's library providing access to
10 the general public.

11 RESPONSE TO INTERROGATORY NO. 15:

12 No.

13 INTERROGATORY NO. 16:

14 Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies
15 and/or tests conducted by any insurance company, including but not limited to Metropolitan Life
16 Insurance Company and Aetna Insurance relating to asbestos exposure in the workplace or the
17 human health consequences of exposure to asbestos? If so:

18 A. Either (1) attach all DOCUMENTS evidencing the information sought in
19 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
20 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
21 may be made the subject of a request for production of documents.

22 B. State the date upon which THIS DEFENDANT first received such
23 DOCUMENTS;

24 C. State the IDENTITY of the custodian of such DOCUMENTS.

25 D. This INTERROGATORY does not apply to DOCUMENTS contained in a
26 library maintained by a DEFENDANT hospital or a DEFENDANT library providing access to
27 the general public.

28 RESPONSE TO INTERROGATORY NO. 16:

1 No.

2 INTERROGATORY NO. 17:

3 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results
4 or conclusions of any studies and/or tests conducted by any laboratory, including but not limited
5 to, the Saranac Laboratory relating to asbestos exposure in the workplace or the human health
6 consequences of exposure to asbestos? If so:

7 A. Either (1) attach all DOCUMENTS evidencing the information sought in
8 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
9 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
10 may be made the subject of a request for production of documents.

11 B. State the date upon which THIS DEFENDANT first received such
12 DOCUMENTS;

13 C. State the IDENTITY of the custodian of such DOCUMENTS.

14 D. This INTERROGATORY does not apply to DOCUMENTS contained in a
15 library maintained by a DEFENDANT hospital or a DEFENDANT library providing access to
16 the general public.

17 RESPONSE TO INTERROGATORY NO. 17:

18 No.

19 INTERROGATORY NO. 18:

20 Had THIS DEFENDANT (except for a defendant that is an educational institution) prior
21 to 1973 ever maintained a library (or libraries) which contained books, articles, periodicals,
22 journals, and/or reference materials that related to the subjects of asbestos, industrial hygiene,
23 medicine, safes, and/or occupational disease. If so, state:

24 A. The date each such library was established;

25 B. The location of each such library;

26 C. The IDENTITY of each librarian or other person in charge of such library.

27 RESPONSE TO INTERROGATORY NO. 18:

28

1 This defendant states that neither GAF Corporation nor The Ruberoid Co. maintained a
2 central corporate library as to occupational safety and health. Any information which did exist
3 was kept by Mr. Harry Mesler while he headed corporate safety for the company from
4 approximately the early 1960's into 1971. Prior to Mr. Mesler's appointment to this position,
5 Ruberoid and GAF employees may have from time to time maintained or possessed personal
6 files containing periodicals and other literature relating to asbestos, its uses and qualities.

7 Mr. Mesler died on August 29, 1972, and the whereabouts of any such information is
8 unknown.

9 INTERROGATORY NO. 19:

10 With the exception of OSHA compliance, had THIS DEFENDANT (except for a
11 defendant that is an educational institution) prior to 1980 exchanged DOCUMENTS or
12 communicated with any person or other COMPANY expressly regarding the results of tests
13 and/or studies relating to asbestos exposure in the workplace or the human health consequences
14 of exposure to asbestos? If so, state:

15 A. Each person or COMPANY with whom the information was exchanged or
16 to whom it was communicated.

17 B. The date(s) of any such exchanges or communications;

18 C. The IDENTITY of the custodian of such DOCUMENTS.

19 RESPONSE TO INTERROGATORY NO. 19:

20 This defendant states that on or around April 14, 1964, W.G. Neel of The Ruberoid Co.
21 attended a meeting of the Board of Directors of NIMA, in Chicago, Illinois. At that time, The
22 Ruberoid Co. first learned that Johns-Manville Corporation, the world's largest manufacturer of
23 asbestos products, was commencing to place a warning on certain of its asbestos-containing
24 products. Richard W. Henry, Sales Manager of Ruberoid's industrial products division, saw, in
25 1964 or 1965, a warning label printed on a box of Johns-Manville calcium silicate thermal
26 insulation. Phillip Bettoli attended a conference held by the New York Academy of Sciences on
27 May 14, 1968, at which health aspects were discussed. Fiber suppliers may have warned
28 purchasers and prospective purchasers. In addition, Ruberoid, until its acquisition by GAF on

1 May 26, 1967, and thereafter GAF, at all times complied with the United States Government's
2 specifications concerning product form, content, packaging and labeling for products to be used
3 in Government-owned and sponsored projects and facilities. Until 1972, the U.S. Government
4 did not require any warning with respect to asbestos-containing products. Nevertheless, as
5 described above, GAF (and Ruberoid, before May 26, 1967) did provide warnings. With respect
6 to these warnings, GAF was at all times in compliance with the Occupational Safety and Health
7 Act of 1970.

8 As to floor tile, commencing in or about 1977, there were discussions involving GAF's
9 representatives to and other members of the RFCI, concerning the promulgation by the RFCI of
10 an integrated set of suggested work practices covering the maintenance, installation and removal
11 of asbestos-containing flooring products, including VAT. GAF and some other members had
12 previously issued their own recommended work practices with the sale of their individual floor
13 tile products. In this connection, there were also discussions concerning whether research should
14 be undertaken to determine whether, in the course of using recommended practices, asbestos
15 fibers are released from floor tile during life-cycle conditions. It was determined that such
16 research or tests should be done.

17 RFCI engaged Stanford Research Institute ("SRI"), an independent consulting, research
18 and testing entity, to monitor and report on the results of certain work practices. The purpose of
19 these industrial hygiene tests was to monitor for airborne asbestos fibers, if any, during
20 conditions of installation, normal traffic, maintenance and removal of VAT.

21 In the latter part of 1978 and during 1979 sites were selected for the individual tests.
22 GAF helped locate appropriate test sites and supplied personnel to assist in the installation and
23 removal tests. SRI independently determined the protocol for the sampling, including the
24 number and location of the pumps, conducted air sampling at each test site and performed the
25 microscopy analysis. It submitted its report to RFCI, and in approximately December, 1979, the
26 report was made public.

27 GAF did not participate in planning or performing SRI's air sampling, nor did it play any
28 role in drafting or approving SRI's results.

1 RFCI's tests and SRI's air sampling results demonstrated that there is no exposure to
2 airborne asbestos fibers during the use or maintenance of VAT, and that when recommended
3 work practices were used during installation and removal, fiber releases, if any, would be
4 substantially below the levels established by the federal government for occupational exposure.

5 GAF cannot state whether any company director knew of the RFCI/SRI tests in 1978-79.
6 However, GAF believes that officers of its Building Products business and/or its Flooring
7 business knew of and approved the idea to undertake the research project inasmuch as it
8 advanced funds to RFCI for the tests, and Mr. Ted Dean, then GAF's Manager of Technical
9 Services for Floor Products, provided assistance to SRI in site selection and certain related
10 matters.

11 GAF cannot state with any specificity the dates when any discussions may have been held
12 concerning the decision to perform the tests, but believes the discussions occurred in 1977 or
13 1978 and resulted in RFCI engaging SRI to monitor the life-cycle tests.

14 INTERROGATORY NO. 20:

15 Has any employee or designee of THIS DEFENDANT testified as a representative of
16 THIS DEFENDANT before the Occupational Safety and Health Administration, the National
17 Institute of Occupational Safety and Health, or any committee or subcommittee of the United
18 States Congress relating to asbestos exposure in the workplace or the human health consequences
19 of exposure to asbestos? If so, please state:

- 20 A. The entity before whom such testimony was given;
21 B. The date(s) and location(s) of such testimony;
22 C. The IDENTITY of the individual(s) who so testified;
23 D. Whether any DOCUMENTS were presented to the entity before which
24 testimony was given;
25 E. Whether copies of DOCUMENTS presented were retained by THIS
26 DEFENDANT and, if so, state the IDENTITY of the custodian of such DOCUMENTS.

27 RESPONSE TO INTERROGATORY NO. 20:

28 See response to Interrogatory No. 12.

1 INTERROGATORY NO.21:

2 Has THIS DEFENDANT (except for a defendant that is an educational institution)
3 conducted, or caused to be conducted, tests, and/or studies of ambient asbestos dust created
4 during the manufacture, processing and/or assembling for sale of ASBESTOS-CONTAINING
5 PRODUCTS? If so, state:

6 A. Each manufacturing facility, including location and address, at which any
7 such test and/or study was conducted;

8 B. The date of each such test and/or study;

9 C. The individual(s) or entity conducting each such test and/or study;

10 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
11 results and/or conclusions of each such study;

12 E. The IDENTITY of the custodian of such DOCUMENTS.

13 RESPONSE TO INTERROGATORY NO. 21:

14 This defendant responds that airborne asbestos dust sampling was conducted in GAF
15 plants starting in approximately 1972, by GAFs Environmental Engineering Department.
16 Documents pertaining to such sampling are under the control of its records retention manager.

17 INTERROGATORY NO.22:

18 Has THIS DEFENDANT (except for a defendant that is an educational institution)
19 conducted, or caused to be conducted, any tests and/or studies on ambient asbestos dust levels at
20 any location or job site where ASBESTOS-CONTAINING PRODUCTS were installed, utilized
21 or removed? If so, for the first 5 sets and/or studies, state:

22 A. The location, including name and address, at which each such test and/or
23 study was conducted;

24 B. The individual(s) or entity conducting each such test and/or study;

25 C. The date of each such test and/or study;

26 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
27 results and/or conclusions of each such test and/or study;

28 E. The IDENTITY of the custodian of such DOCUMENTS.

1 RESPONSE TO INTERROGATORY NO. 22:

2 This defendant responds that jobsites were under the exclusive control of their
3 owners, or employers or contractors at those jobsites. This defendant believes that those owners,
4 employers or contractors present at jobsites (on which this defendant's asbestos-containing
5 industrial thermal insulation products were installed or otherwise used) had a legal duty
6 mandated by state and federal governments to inspect and monitor those jobsites, in the manner
7 required by OSHA and other laws, and this defendant did not have any such legal duty at any
8 time.

9 See response to interrogatory No. 19.

10 INTERROGATORY NO. 23:

11 Did THIS DEFENDANT (except for a defendant that is an educational institution) have
12 any laboratory or other similar type of facility anywhere in the United States at which it
13 conducted, or caused to be conducted, any tests and/or studies of ASBESTOS-CONTAINING
14 PRODUCTS or RAW ASBESTOS relating to the health consequences of asbestos or the dust
15 generated by any use of asbestos or ASBESTOS-CONTAINING PRODUCTS. If so, state:

16 A. The location, including name and address, at which each test and/or study
17 was conducted;

18 B. The individual(s) or entity conducting each such test and/or study;

19 C. The date of each such test and/or study;

20 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
21 results and/or conclusions of each such test and/or study;

22 E. The IDENTITY of the custodian of such DOCUMENTS.

23 RESPONSE TO INTERROGATORY NO. 23:

24 No.

25 INTERROGATORY NO. 24:

26 Has THIS DEFENDANT made available to its employees a medical examination
27 program to determine the absence or presence of asbestos-related disease? If so, state:
28

- 1 A. Whether chest x-rays or pulmonary function tests were part of such
2 program(s);
- 3 B. Whether participation in any such program was a mandatory condition of
4 employment or was voluntary;
- 5 C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);
- 6 D. The IDENTITY of the custodian of such DOCUMENTS.

7 RESPONSE TO INTERROGATORY NO. 24:

8 From the beginning of the manufacture of asbestos-containing industrial thermal
9 insulation products by The Ruberoid Co., such as Calsilite, the standards for manufacture were
10 contained in specifications issued by the U.S. Government and other purchasers as described
11 below, with which specifications Ruberoid complied. Ruberoid's Calsilite was produced to meet
12 these specifications. Further, governmental and industrial hygienists adopted a safety standard of
13 5 m. particles per cubic foot, and the government studies indicated that asbestos-containing
14 industrial thermal insulation products such as this defendant's products, as used in the shipyard
15 and other construction work places, were in compliance with that standard. Further, the
16 President and U.S. Congress, and executive departments adopted that safety standard in the
17 Walsh-Healy Act, and perpetuated it in subsequent regulations. In the early 1970's the United
18 States adopted the standards of the Occupational Safety and Health Act, with which the products
19 of this defendant have also complied.

20 From time-to-time during the period beginning in approximately 1930, this defendant
21 called upon local physicians from surrounding cities or towns near its plant locations to perform
22 routine physical examinations and to administer routine medical treatment when and if
23 necessary.

24 //

25 //

26 INTERROGATORY NO. 25:

27 Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related
28 injury against THIS DEFENDANT or against any Workers' Compensation insurance carrier

1 which provided coverage for THIS DEFENDANT? If so, state the total number of such claims
2 and, for the first 20 such claims state:

- 3 A. The date of such claim;
4 B. The name of the claimant;
5 C. The case number;
6 D. The court in which the claim was filed;
7 E. The IDENTITY of THIS DEFENDANTs custodian of DOCUMENTS
8 evidencing such claims.

9 RESPONSE TO INTERROGATORY NO. 25:

10 For purposes of this response, GAF includes any workers compensation claim in which
11 the workers compensation judge made a finding that the worker had asbestosis, mesothelioma,
12 lung cancer and/or died as a result of asbestos exposure. Such claims do not include matters
13 where only the claimant, the claimants workers compensation lawyer, or the claimants workers
14 compensation doctor alleged an asbestos-related disease but where the judge did not sustain
15 those allegations. GAF does not necessarily agree that all of the workers compensation judges
16 findings of asbestos-related disease were correct, and GAF reserves the right to prove, in this and
17 other litigations, that each or any of the asbestos-related claims identified in the response to this
18 interrogatory was not truly asbestos-related.

<u>CLAIMANT</u>	<u>CLAIM DATE</u>	<u>ORDER DATE APPROVING SETTLEMENT OR JUDGMENT</u>	<u>JURISDICTION</u>
DEMETER, Stanislaw	4/27/67	12/5/68	New Jersey
FRANCIS, Joseph	9/20/72	6/20/74	New Jersey
MARSDEN, James	?/?/72	11/30/72	New Jersey
LUMBRA, Arthur	?/?/68	?/?/69	Vermont

26 INTERROGATORY NO. 26:

27 Does THIS DEFENDANT have insurance available to cover judgment(s) entered against
28 it in asbestos-related personal injury lawsuits? If so, state:

1 A. The name and principal place of business of any insurance carrier who has
2 issued such policy of insurance;

3 B. The number and effective date of each policy;

4 C. The amount(s) of coverage of each policy;

5 D. The applicable dates of coverage.

6 RESPONSE TO INTERROGATORY NO. 26:

7 This defendant responds that, on January 7, 1987, this defendant entered the Asbestos
8 Claims Facility, Princeton, New Jersey. This defendant is prepared to provide copies of what it
9 believes to be the relevant policies.

10 INTERROGATORY NO. 27:

11 State whether YOU have controlled, purchased, or in any way acquired any controlling
12 interest in any corporation or business entity which has mined, manufactured, produced,
13 processed, compounded, sold, supplied, distributed and/or otherwise placed RAW ASBESTOS
14 or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce. If so, state:

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

16 B. The dates YOU controlled, purchased or acquired any interest; and

17 C. The nature of the business as it pertains to asbestos.

18 RESPONSE TO INTERROGATORY NO. 27:

19 See response to Interrogatory Nos. 3 and 39.

20 INTERROGATORY NO. 28:

21 State whether THIS DEFENDANT, between 1930 and 1985, has ever engaged in the
22 following activities with regard to RAW ASBESTOS, and if so, state the inclusive dates of such
23 activity:

24 A. Mining;

25 B. Milling;

26 C. Supply;

27 D. Importing;

28 E. Processing;

- F. Distribution;
- G. Marketing;
- H. Sale;
- I. Brokering.

RESPONSE TO INTERROGATORY NO. 28:

Subject to the definition of raw asbestos, this defendant responds:

- A. 1937-1975
- B. 1937-1975
- C. 1937-1975
- D. Unknown years between 1937 and 1975
- E. 1937-1975
- F. No
- G. 1937-1975
- H. 1937-1975
- I. No.

INTERROGATORY NO. 29:

If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the affirmative, state:

- A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or MARKETING in any form or quantity between 1930 and 1985;
- B. The date(s) such RAW ASBESTOS was first placed on the market, including the date(s) such RAW ASBESTOS was first marketed;
 - 1. On an experimental basis;
 - 2. On a test basis;
 - 3. For sale.
- C. The date(s) such RAW ASBESTOS:
 - 1. Ceased to be produced; or
 - 2. Was recalled from the market, if ever.

1 D. A description of the chemical composition of such RAW ASBESTOS,
2 including the type and/or grade of asbestos;

3 E. A description of the physical appearance and nature of such RAW
4 ASBESTOS, including any color coding, distinctive marking and/or logo on the packaging or
5 container;

6 F. A detailed description of the intended use of such RAW ASBESTOS,
7 including any temperature limits for each such use;

8 G. Whether such RAW ASBESTOS was on the U.S. Government's "Qualified
9 Products List," and if so, the inclusive dates it was on such list;

10 H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold.
11 As to each such, state:

12 I. Whether any of THIS DEFENDANTs RAW ASBESTOS has, at any time,
13 been sold, shipped, or otherwise distribute, used or installed to or at any COMPANY (including
14 power company or utility), governmental agency or entity, shipyard, distributor, refinery,
15 contractor, supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the
16 GEOGRAPHIC AREA and whether any of THIS DEFENDANTs RAW ASBESTOS has at any
17 time, been sold to any manufacturer, or manufacturing facility, of ASBESTOS-CONTAINING
18 PRODUCTS. If so, state:

19 1. The names of each such COMPANY, governmental agency or
20 entity, shipyard, distributor, supplier, manufacturer or refinery;

21 2. The inclusive dates of each such sale, and the amount (quantity)
22 and the trade brand name of such RAW ASBESTOS sold;

23 3. The manner of shipment (e.g. boat, rail, etc.)

24 4. Whether you have any records indicating any such sale or shipment
25 and, if so, the name, address and job classification of each person who currently has possession
26 of such records.

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

1 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
2 they may be made the subject of a request for production of documents.

3 RESPONSE TO INTERROGATORY NO. 29:

4 Subject to a reasonable and proper definition of the term raw asbestos, this defendant
5 responds:

6 1. 115 Insulation Cement

7 115 Insulation Cement was a chrysotile asbestos product which, in some instances, was
8 produced at Ruberoid/GAF's Vermont facility and in other instances was purchased from various
9 other asbestos suppliers and resold. Some of the product purchased from other suppliers may
10 have been milled again at Ruberoid/GAF's Vermont facility prior to resale. Asbestos insulation
11 cements produced at GAF's Vermont facility could generally be distinguished from asbestos
12 insulation cements produced by other manufacturers inasmuch as the Vermont product was a slip
13 chrysotile asbestos rather than a cross vein asbestos and was generally of a lower grade and
14 contained a greater percentage of impurities, such as dirt and rock particles. It is believed that
15 this product was sold from at least as early as 1937 to 1975. It is believed that the "115"
16 designation was employed from approximately 1950 to 1975 and the designation "Grade B" was
17 also employed in years prior to 1950.

18 The basic ingredients of this cement product were:

19 chrysotile determined to pass the 0-0-1-15 Quebec test

20 impurities (dirt, rock, earth)

21 The particular formulas utilized by entities which purchased this product for construction
22 are not known by GAF, but this product was normally mixed with Portland cement, water and/or
23 other substances.

24 2. 214 Insulation Cement

25 214 Insulation Cement was also a chrysotile asbestos product which, in some instances,
26 was produced at GAF's Vermont facility and in other instances was purchased from various other
27 asbestos suppliers and resold. Some of the product purchased from other suppliers may have
28 been milled again at Ruberoid/GAF's Vermont facility prior to resale. Ruberoid/GAF's Vermont

1 product was a lower grade cement which contained a greater percentage of impurities, such as
2 dirt and rock particles, making it lightly mottled and giving it an overall darker appearance. It is
3 believed that this product was sold from at least as early as 1937 to 1975. It is believed that the
4 "214" designation was employed from approximately 1950 to 1975 and the designation "Grade
5 BB" was also employed in years prior to 1950.

6 The basic ingredients of this cement product were:

7 chrysotile determined to pass the 0-0-2-14 Quebec test

8 impurities (dirt, rock, earth)

9 The particular formulas utilized by entities which purchased this product for construction
10 are not known by GAF, but this product was normally mixed with Portland cement, water and/or
11 other substances.

12 Both "115" and "214" insulation cements could be packed "loosely" in burlap through the
13 1940's and thereafter "pressure packed" or "semi-pressure packed" in either kraft paper, plastic
14 lined or woven plastic bags.

15 3. Other Insulation Cements

16 In unknown years prior to 1955, which varied by product, Ruberoid listed for sale the
17 following other insulation cements. Except as stated below, little is known about these products,
18 including the specific years they were offered, the constituents and, except as indicated, whether
19 or not they were manufactured or produced by Ruberoid.

20 a. Grade 203 Insulating Cement - Grade 203 had a screen test of
21 approximately 0-0-8-8 which was intended to result in a light, fluffy cement. It was practically
22 free of grit and dirt. Its temperature limit was 1200 degrees F.

23 b. Grade 016 Insulating Cement - This 100% chrysotile cement had a screen
24 test of approximately 0-0-1-16 which made it the lowest grade cement sold by Ruberoid/GAF.

25 In the years 1937-75 this defendant sold chrysotile determined to pass higher Quebec
26 tests, but it is not believed this fiber was used in the manufacture of asbestos-containing
27 industrial thermal insulation products.

28 It is believed GAF asbestos was on the Governments Qualified Products List.

1 As to purchasers, upon the plaintiffs supplying a list of worksites/employers and dates
2 relevant to their claims, this defendant will supply responsive documents, if any.

3 INTERROGATORY NO. 30:

4 Between 1930 and 1985, did YOU ever engage in any of the activities listed below with
5 regard to ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such
6 activity:

- 7 A. Supply;
- 8 B. Importing;
- 9 C. Distribution;
- 10 D. Marketing;
- 11 E. Sale;
- 12 F. Labeling;
- 13 G. Manufacturing;
- 14 H. Brokering;

15 RESPONSE TO INTERROGATORY NO. 30:

16 This defendant responds yes as to some products in some years between 1929 and 1981,
17 with the exception of H., which is denied.

18 INTERROGATORY NO. 31:

19 If your answer to any subpart of Interrogatory No. 31 regarding "ASBESTOS
20 CONTAINING PRODUCTS" is in the affirmative, state:

21 A. The trade, brand name, and/or generic name of each such ASBESTOS
22 CONTAINING PRODUCT MARKETED in any form or quantity between 1930 and 1985;

23 B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first
24 placed on the market, including the date(s) each such ASBESTOS-CONTAINING PRODUCT
25 was first MARKETED;

- 26 1. On an experimental basis;
- 27 2. On a test basis; or
- 28 3. For sale.

1 C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

2 1. Ceased to be produced; or

3 2. Was recalled from the market, if ever.

4 D. A detailed description of the chemical composition of each such

5 ASBESTOS CONTAINING PRODUCT, including the type and/or grade of asbestos and/or

6 asbestos fiber contained in each such product and the quantitative percentage of asbestos or

7 asbestos fiber in each such product, and all non-asbestos components of the ASBESTOS-

8 CONTAINING PRODUCT, and if the chemical composition changed over time, the inclusive

9 dates of each formulation;

10 E. A description of the physical appearance and nature of each such

11 ASBESTOS-CONTAINING PRODUCT, including any color coding, distinctive marking and/or

12 logo, either on the product or on the packaging;

13 F. A detailed description of the intended use of each such ASBESTOS-

14 CONTAINING PRODUCT, including any temperature limits for each such use;

15 G. Whether any such ASBESTOS-CONTAINING PRODUCT was on the

16 U.S. Government's "Qualified Products List," and if so, the inclusive dates it was on such list;

17 H. The name and address of the supplier of the RAW ASBESTOS used in

18 each such product and the time period of such supply;

19 I. Whether any of THIS DEFENDANTs RAW ASBESTOS OR

20 ASBESTOS-CONTAINING PRODUCTS have, at any time, been sold, shipped, or otherwise

21 distributed to any COMPANY (including power company or utility, governmental agency or

22 entity, shipyard, distributor, refinery, contractor, supplier, manufacturer, PREMISE owner or

23 occupant, shipowner, or other PREMISE or site in the GEOGRAPHIC AREA. If so, state:

24 1. The names of each such COMPANY, governmental agency or

25 entity, shipyard, distributor, supplier, manufacturer, refinery, contractor, PREMISE owner or

26 occupant, ship, owner, PREMISE or site;

27

28

1 2. The inclusive dates of each such sale, shipment, distribution, use or
2 installation and the amount (volume) and the trade or brand name of each such ASBESTOS-
3 CONTAINING PRODUCT sold;

4 3. Whether you have any records indicating any such sale, shipment,
5 distribution, use or installation and, if so, the name, address and job classification of each person
6 who currently has possession of such records.

7 J. Either (1) attach all DOCUMENTS evidencing the information sought in
8 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
9 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
10 may be made the subject of a request for production of documents.

11 RESPONSE TO INTERROGATORY NO. 31:

12 This defendant responds:

13 I. CALSILITE®

14 With the support and at the behest of the United States Government which needed to
15 increase wartime production of shipboard insulation materials, in 1944 Ruberoid constructed a
16 Calsilite® plant in Gloucester City, New Jersey, to manufacture Calsilite® pipe covering and
17 block insulation. The plant was completed in approximately November, 1944. Some limited
18 production of Calsilite® occurred prior to the plant's completion. GAF believes that all
19 Calsilite® production during World War II was for the United States Navy. In June, 1947 the
20 Calsilite® facility was shut down temporarily and all outstanding orders were canceled. The
21 facility was reopened on July 10, 1947 and operated on a pilot plant basis until March 7, 1949.
22 During this research project period, production was limited and of an experimental nature.
23 Calsilite® was again manufactured on a commercial basis by Ruberoid beginning on March 7,
24 1949, and then by General Aniline & Film Corporation in 1967, and then by GAF Corporation
25 from 1968 to October, 1971, when the plant was closed.

26 Calsilite® was a lightweight, hard, calcium silicate insulation designed to withstand
27 temperatures up to 1250° F. Calsilite® pipe covering was manufactured in three-foot lengths and
28 in varying thicknesses. It was available in half-sectional pieces and, at various times, in three-

1 segmental and regular segmental shapes, for assembly around a pipe in single or double layers.
2 Pipe covering normally was provided with standard weight cotton or canvas jackets applied with
3 silicate of soda. No "T's," elbows or joints were produced. Flat Calsilite® blocks were
4 manufactured, at various times, in 18 or 36-inch lengths, in widths from 3 to 36 inches, and in
5 thicknesses up to 4 inches. Six-inch wide curved segmental blocks, capable of contouring more
6 easily for insulation of large pipes and circular vessels, also were available. Throughout the time
7 it was manufactured, Calsilite® pipe covering and block was packaged in corrugated boxes.

8 Calsilite® was manufactured by a "pan-molding" method until 1964 when Ruberoid
9 began using a "filter-press" method or process. Pan-molded Calsilite® was grayish white and
10 relatively smooth, with some small holes. Calsilite® filter press was grayish white with screen
11 marks on the outer surfaces.

12 Calsilite®-Hi, developed in or around 1960, could withstand temperatures up to 1800° F.
13 In the mid-to-late 1960s, Ruberoid developed Calsilite® SS, an "inhibited" product designed
14 specifically to prevent stress corrosion and cracking of stainless steel piping.

15 In addition to formula changes made in connection with product development, the
16 Calsilite® formula was adjusted often in order to compensate for changes in the quality and
17 availability of raw materials. GAF does not have a complete set of all the formulas used in
18 Calsilite® production nor does it have complete information about the production dates of
19 known formulas.

20 This defendant began production of asbestos-free Calsilite® after having developed the
21 product as a result of a project initiated sometime after the acquisition of The Ruberoid Co. on
22 May 26, 1967, with sales beginning in 1970 or 1971. This product was identified as "Calsilite®
23 II" or "Calsilite® A-F." However, without adding asbestos, GAF was unable to manufacture a
24 calcium silicate insulation which met all applicable United States Government specifications.
25 These limitations made it impossible for this defendant to manufacture and sell an asbestos-free
26 Calsilite® that met applicable Government requirements. GAF asked the Government (U.S.
27 Navy) to modify its specifications so that GAF's new product could be sold to the Navy and other
28 customers who required that materials meet such specifications. The failure by the United States

1 Government to act promptly to approve non-asbestos Calsilite® for procurement was the leading
2 factor resulting in the closure of the entire Calsilite® facility.

3 II. ASBESTOS PAPER AND MILLBOARD PRODUCTS

4 Asbestos paper, millboard and laminated products were manufactured at Erie,
5 Pennsylvania, by Ruberoid from 1928 to 1967, and then by General Aniline & Film Corporation
6 in 1967, and then by GAF Corporation from 1968 to 1981, when the Erie facility was sold.

7 These products generally were shipped in cardboard cartons of varying sizes, except for Imperial
8 insulation and sponge felt which, because of their weight and bulk, were packaged into sections
9 in wooden crates.

10 Asbestos Paper

11 Asbestos paper was designed to be used alone or in the manufacture of other products. It
12 was manufactured in various thicknesses, according to customer specifications. Asbestos paper
13 had a temperature limit of 250 degrees F. Its primary constituent was chrysotile asbestos,
14 generally a mixture of grades 5 to 7. Other constituents included sulphite pulp, diatomaceous
15 earth and starch, although in the early years of manufacture this product may have consisted only
16 of chrysotile and starch (which was sometimes in the form of tapioca).

17 Rollboard

18 Rollboard was an asbestos paper product, consisting of plies of asbestos paper bonded
19 together without glue to create thicknesses varying from 1/16 to 1/8 of an inch. Rollboard had a
20 temperature limit of 250 degrees F.

21 //

22 //

23 //

24 Millboard

25 Millboard was a stiffer product than asbestos paper or rollboard and was manufactured in
26 sheets of varying thicknesses according to customer specifications. Millboard consisted
27 generally of chrysotile asbestos (usually grades 5D, 5R and 6D), sulphite pulp and often other
28

1 constituents, bonded with Portland cement and/or starch. In later years, at least as early as 1974,
2 latex was added as a binder.

3 Corrugated Asbestos Paper

4 Corrugated asbestos paper was designed to be used alone or in the manufacture of other
5 products. It was made in three types: 1/4 inch thickness per ply (4 plies/inch); 1/8 inch thickness
6 per ply (6 plies/inch) and 1/16 inch thickness per ply (8 plies/inch). It was manufactured by
7 adhering 36" to 37 1/2" wide flat sheets of asbestos paper (usually six pound paper) with silicate
8 of soda to sheets of the same paper which had been corrugated using characteristic "Roman
9 Arch" shaped corrugations, 26-28 to the foot. Its constituents were those of the asbestos paper
10 from which it was constructed. Corrugated asbestos paper was sold in 250 and 500 square foot
11 rolls.

12 Air Cell

13 Air cell was a corrugated asbestos paper product manufactured from 1928 to
14 approximately 1958. It was constructed of layers to the thickness specified by the customer of
15 36 or 37-1/2 inch wide flat asbestos paper which was adhered to corrugated asbestos paper with
16 silicate of soda. The corrugations of this product had a characteristic "Roman Arch" shape. As
17 of 1938, the corrugated paper component had 28 corrugations per linear foot. Each ply was 1/4
18 inch thick and air cell came in three standard thicknesses - 2-ply, 3-ply, and 4-ply. Air cell pipe
19 covering, sheets and blocks were sold. Often a canvas, cloth or pyroxyline jacket was applied to
20 the outer surface of air cell pipe covering with an adhesive, usually a starch or cereal paste. 2-1/2
21 inch wide brass lacquered bands were provided for each canvas-jacketed section of air cell pipe
22 covering to hold it to the pipe. With the pyroxyline jacket, three 1-inch wide black japan bands
23 were supplied with each section. Air cell had a temperature limit of 250 degrees - 350 degrees F.
24 Prior to 1935, air cell may have been sold only under the name "Celasbestos, which was
25 available in 5, 6, 7 and 8 ply versions as well as 1-4 ply versions.

26 Watcocell

27 Watcocell was a corrugated asbestos paper product manufactured as Watcocel from 1928
28 to 1934, as Supercell from 1935 to 1942 and as Watcocell from 1942 to 1960. In 8-ply per inch

1 Watcocell, the corrugations were 1/16" thick; in 6-ply, the corrugations measure about 1/8"
2 thickness. Watcocell was sold in rolls, sheets and blocks. Watcocell's temperature limit was 250
3 degrees F.

4 Imperial Insulation

5 Imperial insulation was manufactured from at least 1936 to approximately 1960 and was
6 discontinued due to a lack of commercial demand. It had a temperature limit of 500 degrees -
7 700 degrees F. Imperial paper consisted of two plies of flat asbestos paper which were passed
8 through an indenting roll resulting in a waffle-like appearance with closely spaced square
9 indentations. Imperial pipecovering was wound on a mandrel to achieve the desired thickness
10 and canvas-covered. In early years of production, layers of Imperial may have been stapled
11 together or stitched with strands of wire rather than wound on a mandrel. Imperial sheets and
12 blocks were made of layers of Imperial paper glued to the desired thickness with a fireproof glue,
13 such as silicate of soda. This product was sold with a canvas, asphalted felt or pyroxyline jacket.

14 Aristo Insulation

15 The years of manufacture of Aristo Insulation are unknown, except that it was listed for
16 sale in and around 1940. It was a corrugated asbestos paper product with carefully measured
17 indentations and 23-25 laminations per inch of thickness. Its temperature limit was 700 degrees -
18 750 degrees F. The asbestos paper used in this product was treated with a surface treatment,
19 possibly Bennett size. This product was sold in a standard thickness of one inch, but often was
20 used in thicknesses up to and exceeding three inches. Standard canvas and waterproof jackets
21 were available for this product.

22 //

23 //

24 Sponge Felt

25 Sponge felt was manufactured from 1936 to approximately 1960 and was discontinued
26 due to a lack of commercial demand. It consisted of asbestos sponge paper made by imbedding
27 small pieces of sponge into asbestos paper. Its temperature limit was 750 degrees F. It was sold
28

1 in 36-inch wide rolls, sheets and blocks which were produced in the same manner as Imperial
2 products.

3 Woolfelt

4 Woolfelt, a wool or rag felt insulation manufactured from 1928 to approximately 1959,
5 did not contain asbestos, but was sometimes sold with an asbestos paper liner or backing paper.
6 Tar-lined woolfelt was sold with a tar paper liner which did not contain asbestos. Twin-purpose
7 woolfelt was sold with a liner of asphalt coated asbestos paper.

8 Anti-Sweat Pipe Covering

9 Manufactured until approximately 1958, anti-sweat pipe covering was intended
10 exclusively for residential use on cold water pipes. At least as early as 1936 this product was
11 composed of an inner layer of asphalt-saturated asbestos paper followed by a 1/2 inch layer of
12 woolfelt, 2 layers of asphalt-saturated asbestos paper, another 1/2 inch layer of woolfelt and two
13 final layers of asphalt-saturated asbestos paper. The outermost layer had a flap extending at least
14 3 inches beyond the longitudinal joint. GAF does not know whether a jacket was ever provided
15 with this product. This product was sold in 36 inch wide rolls and had a temperature limit of 50
16 degrees F.

17 Frost-Proof Pipe Covering

18 Practically nothing is known of this product which was apparently constructed of a layer
19 of felt made from cattle, goat or other animal hair with layers of asphalt-saturated asbestos paper
20 and a layer of woolfelt. Its years of manufacture, appearance and temperature limit are unknown
21 to GAF.

22 Range Boiler Jacket

23 This product consisted of a series of plies of corrugated asbestos paper built up to the
24 required thickness on mandrels that were the same size as the range boilers the product was
25 designed to fit. The corrugated paper used was a coarse variety with four plies per inch of
26 thickness. These jackets were furnished in two sections - upper half and lower half. Five extra-
27 wide bands were provided to attach the jacket to the range boiler. The outside surface was
28 painted or covered with canvas. GAF does not know the years of manufacture of this product.

1 T/NA-100

2 T/NA-100 was manufactured from 1962 until 1971. This asbestos paper product was a
3 thin, fully bound two-ply laminated product consisting of an interior layer of asbestos paper
4 bonded with Neoprene to a layer of polyvinylfluoride (Tedlar) plastic film on the exterior of the
5 product. T/NA-100 was also sold with a back surface vapor barrier of Dow "Saran" film. The
6 paper inner layer was manufactured in Erie, Pennsylvania, the Neoprene outer layers were
7 supplied by DuPont, and the product was assembled by High Vacuum Company, Passaic, New
8 Jersey. Manufacture of this product was discontinued because it was not profitable.

9 At various times, Ruberoid product brochures and advertising listed for sale asbestos-
10 containing products not known to have been manufactured by Ruberoid, including 85%
11 magnesia and diatomaceous earth products, but which may have been manufactured for
12 Ruberoid. This defendant is aware of no sales documents with respect to these products, the year
13 of any sale of any such products or of any specific sale. However, this defendant is aware
14 through litigation of individual Ruberoid labels upon sections of pipe covering indicating that the
15 material was 85% magnesia pipe covering manufactured for Ruberoid by Plant Rubber and
16 Asbestos Company, and perhaps others. It is believed that this material dates from the late
17 1930's.

18 III. INSULATING CEMENTS

19 1. Calsilite® Insulation Cement

20 Calsilite® Insulation Cement was a combination of chrysotile asbestos fiber, ground
21 Calsilite® pipe covering or block, and Portland and other cements.

22 It is believed that this product was made with Vermont-produced asbestos and thus
23 contained certain impurities, such as rock, dirt and earth particles. This product was never
24 widely or frequently sold and did not gain commercial acceptance. To the extent such sales took
25 place, they ceased completely in or around 1960, although the product was listed for sale until
26 approximately 1963-64. Generally, the product was packaged in kraft paper bags with a plastic
27 lining.

28 2. Other Insulation Cements

1 In unknown years prior to 1955 which varied by product, Ruberoid listed for sale the
2 following other insulation cements. Except as stated below, little is known about these products,
3 including the specific years they were offered, the constituents and, except as indicated, whether
4 or not they were manufactured or produced by Ruberoid.

5 a. Grade AA Insulating Cement - Grade AA was manufactured by Ruberoid
6 using a high grade of pure asbestos fiber together with suitable binding materials that had low
7 conductivity. It was designed to yield a hard, durable surface. Its temperature limit was 1200
8 degrees F.

9 b. Grade A Insulating Cement - This was a factory- prepared cement
10 consisting of fibers which were not as long as those used in the better grade AA, together with
11 suitable binding materials. Its temperature limit was 1000 degrees F.

12 c. Grade H F - Hard Finish - This was a hard finish cement designed to be
13 used as a final protective coating over other coats of cement. It had a smooth, glossy, hard finish.
14 Grade HF was recommended to be applied in a 1/4" thick layer. It had a temperature limit of
15 1500 degrees F and was a prepared cement manufactured by Ruberoid.

16 d. Grade HF - Hard Finish #48 High Gloss - This was another hard finish
17 cement manufactured apparently in 1945 and possibly other years.

18 e. Grade H. T. - High Temperature Cement - This cement was designed to
19 withstand temperatures of 1600 to 1800 degrees. This material was not designed to be used for
20 finishing purposes.

21 f. Satin Finish Cement

22 g. Grade A-11 Insulating Cement - This product consisted of vermiculite,
23 chrysotile, and binding substances. It was recommended for temperatures up to 1500 degrees F,
24 or 1800 degrees F if the applicator did not intend to reclaim the material. Grade A-11 was
25 designed to be an insulation material, not a finishing cement.

26 h. Coverkote - Coverkote was designed to be a weatherproof coating for
27 insulated surfaces, rather than an insulating cement. It was a combination of emulsified asphalt
28 and 25-28% chrysotile. It was a black plastic material particularly designed for protection of

1 insulation on large tanks and vessels and for insulated equipment such as smoke breechings and
2 ducts. The temperature limit for Coverkote was 400 degrees F.

3 i. Rock Wool Cement - Little is known about this product which was
4 apparently available from Ruberoid in the late 1940's and early 1950's. It consisted of a mixture
5 of rock wool and chrysotile asbestos and had a temperature limit of 1500 degrees F.

6 Insulation cements of different fiber sizes, commonly known as sizes 313 and 412, were
7 sold by The Ruberoid Co. from 1937 until 1967 and by General Aniline & Film Corporation and
8 then GAF Corporation from 1967 to 1975.

9 IV. ASBESTOS-CEMENT SHINGLES AND SIDING

10 The Ruberoid Co. commenced the manufacture of asbestos-cement shingles and siding
11 with its acquisition of a controlling interest in Eternit, Inc., in 1932. The Ruberoid Co. and, after
12 May 26, 1967, GAF produced shingle and siding products at the St. Louis, Missouri, facility
13 from 1932 to 1978, at the South Bound Brook, New Jersey, facility from 1935 to 1978, at the
14 Dallas, Texas, facility from 1948 to 1963 and at the Mobile, Alabama, facility from 1936 to
15 1978. These products contained only fully encapsulated asbestos, completely bound by Portland
16 cement, and in some cases were further bound by a polymer plastic coating. Only chrysotile
17 asbestos in varying quantities was utilized.

18 As a manufacturer and seller only, The Ruberoid Co. (and later GAF) did not have the
19 discretion or control to determine the method or manner of using or applying asbestos shingle
20 and siding products. Such products could have been used for a variety of purposes in the
21 construction industry. Such products were used almost exclusively for outdoor applications.

22 //

23 //

24 V. ASBESTOS FELT FOR ROOFING APPLICATIONS

25 The Ruberoid Co. commenced the manufacture of asbestos felts with its acquisition of
26 the H.F. Watson Company in 1928. The Ruberoid Co.'s (and later, GAF's) 16th Street facility at
27 Erie, Pennsylvania, produced the felt and shipped it to various roofing plants to be saturated with
28 asphalt or coal tar pitch from 1928 to 1981.

1 Not all roofing felts manufactured by GAF contained asbestos. Only chrysotile asbestos
2 was utilized.

3 Asbestos-containing roofing felts were generally shipped in rolls with an outer-covering
4 of paper.

5 VI. FLOORING:

6 Sheet vinyl flooring was a laminated product composed of an asbestos felt backing
7 (consisting of asbestos and binders) which was adhered to a layer of vinyl. Only chrysotile fiber
8 was used. Sheet vinyl flooring was initially produced in thicknesses varying from 0.50 inch to
9 0.75 inch.

10 GAF Corporation did not manufacture any floor tile products prior to its acquisition of
11 The Ruberoid Co. on May 26, 1967. Following the acquisition of The Ruberoid Co., GAF
12 continued to manufacture floor tile under the Ruberoid name until 1970. After 1970 and up until
13 1981, the trade name GAF was introduced on the floor tile and included the manufacture of such
14 brand names as GAF, GAFSTAR, and/or Ruberoid Resilient or Architectural Series vinyl
15 asbestos floor tile and Vinylflex vinyl composition tile. Particular styles of such tile were
16 marketed under the following names: Royal Stoneglow, Royal Travertine, Travertine, Finegrain,
17 Marbleized, Thru-Chip, Thru-Chip Accents, Thru-Chip Pastels, Thru-Chip Deeptones, Mini-
18 Chip, Antiqua and Royal Antiqua. The GAF Floor Products Division was sold on October 1,
19 1981, which concluded this defendant's involvement in manufacturing asbestos-containing floor
20 tile.

21 Asbestos-containing floor tile generally consisted of limestone, vinyl copolymer,
22 plasticizers, pigments, secondary resins, stabilizers and a small quantity of chrysotile fiber.
23 Asbestos-containing floor tile intended for commercial use (architectural tile) was generally
24 marketed in 12" squares, 1/8" and 3/32" thick. Asbestos-containing floor tile was manufactured
25 at Houston, Texas (1959 through mid-to-late 1970's), Long Beach, California (1959-81), Joliet,
26 Illinois (1959-81), Newburgh, New York (1959-65), and Vails Gate, New York (1965-81). The
27 Joliet plant was closed for one year in the mid-1960's.
28

1 After GAF acquired Ruberoid, it produced two basic types of asbestos-containing floor
2 tiles, asphalt tile and vinyl asbestos tile (VAT). Asphalt tile generally consisted of limestone,
3 coumene resin, gilsonite, petroleum resins, asphalt plasticizers, pigments and chrysotile fiber.
4 Asphalt tile was manufactured in 9" x 9" squares only and in 1/8" and 3/32" thicknesses. The
5 asbestos content of asphalt tile varied from plant to plant but remained between approximately
6 25% to 30%. Asphalt tile was manufactured in the Long Beach plant from 1959 to the early-mid
7 1970s.

8 VAT generally consisted of limestone, vinyl copolymer, plasticizers, pigments, secondary
9 resins, stabilizers and chrysotile fiber. Floor tile intended for commercial use initially was
10 available in 9" x 9" square and later in 12" x 12" squares, and was 1/8" and 3/32" thick. The
11 asbestos content of VAT, which varied from plant to plant, started at approximately 24% to 26%,
12 but decreased over the relevant time period to approximately 10% to 15%. As the percentage of
13 asbestos in VAT decreased, other constituents, particularly limestone, increased proportionately.
14 VAT was manufactured in the Long Beach plant from the early 1960s to September 31, 1981.

15 It is believed some of GAF's products were on the Governments Qualified Products List;
16 this defendant will respond to a proper request for production.

17 As to purchasers, upon the plaintiffs supplying a list of worksites/employers and the dates
18 relevant to their claims, this defendant will supply possibly relevant documents as to certain
19 products for which the records are reasonably accessible.

20 VII. PAINT

21 Asbestos paint products were generally composed of cutback (asphalt which has been
22 combined with a solvent) and chrysotile fiber. Other ingredients could include pulverized silica,
23 limestone, naphtha or aluminum paste. Such paints were black, non-friable and tar-like, used in
24 the construction and repair of roofs.

25 This defendant states that, as a manufacturer and seller only, the method or manner of
26 using its asbestos-containing products was determined by the purchaser, contractor or other user
27 in the field, and was not within the discretion of this defendant.

1 The only possibly relevant sales of this defendant's asbestos-containing industrial thermal
2 insulation products would be for those shipments made to jobsites on which and during years in
3 which plaintiffs actually worked.

4 INTERROGATORY NO. 32: (PREMISES DEFENDANTS only)

5 Did YOU install, remove, or handle or contract to have others install, remove, or handle
6 RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any PREMISES in the
7 GEOGRAPHIC AREA which PREMISES is at issue as to YOU in San Francisco Superior Court
8 asbestos litigation as of the date of your answers to these interrogatories? If so:

9 A. IDENTIFY the PREMISES.

10 B. For each of the PREMISES:

11 1. State the nature of your ownership or possessory interest;

12 2. State the inclusive date of that interest;

13 3. IDENTIFY the party from whom that interest was acquired;

14 4. IDENTIFY the party, if any, to whom that interest was transferred.

15 C. IDENTIFY every contract to which YOU were a party or of which
16 you have, knowledge wherein the performance of such contract involved the installation,
17 removal, disturbing or handling of any RAW ASBESTOS or ASBESTOS-CONTAINING
18 PRODUCTS at YOUR PREMISES. For each such contract:

19 1. IDENTIFY the parties to the contract;

20 2. Provide a general description and specific location of the work to
21 be performed by each party to the contract;

22 3. IDENTIFY and describe the NATURE of the RAW ASBESTOS
23 or ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the
24 performance of the contract;

25 4. State the dates of the contract and the dates of performance;

26 D. Except as provided in response to subpart (c), has any work other than
27 routine maintenance been done on or to the PREMISES that involved the installation, removal,
28 disturbing or

1 handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so, for
2 each such instance:

- 3 1. State the inclusive dates of the work;
- 4 2. Provide a general description and specific location of the
5 work;
- 6 3. State whether the work was done by YOU and/or YOUR
7 employees;
- 8 4. IDENTIFY and describe the NATURE of the RAW
9 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, handled or
10 disturbed;
- 11 5. IDENTIFY from whom the RAW ASBESTOS OR
12 ASBESTOS-CONTAINING PRODUCTS were acquired.

13 E. Has any asbestos abatement effort been made at the PREMISES? If
14 so, for each such effort:

- 15 1. IDENTIFY who did the work;
- 16 2. State the inclusive dates thereof;
- 17 3. State whether samples were taken, and, if the samples still
18 exist, IDENTIFY the custodian of the samples;
- 19 4. State whether any material was tested, and, if so, what were
20 the results of each test;
- 21 5. IDENTIFY each test result with sufficient particularity for
22 purposes of a request for production of documents, or, in the alternative, attach a copy to YOUR
23 answers to these interrogatories.

24 F. Except for insurance coverage litigation, have you filed suit
25 against, or otherwise sought to recover from, any person or entity for some or all of the cost of
26 asbestos abatement or for the property damage allegedly caused by the presence of RAW
27 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS on the PREMISES identified in
28 response to subpart (A) above? If so:

1 1. IDENTIFY the person or entity against whom YOU have
2 filed suit or otherwise sought to recover;

3 2. If YOU have filed suit, state the court in which the action
4 was filed, the date on which it was filed, IDENTIFY all Plaintiffs and Defendants and their
5 counsel of record;

6 3. State whether or not the case has been resolved, and, if so,
7 what was the status or disposition.

8 G. Either (1) attach all DOCUMENTS evidencing the information
9 sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach
10 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
11 they may be made the subject of a request for production of documents.

12 H. IDENTIFY the person(s) presently most knowledgeable about the
13 information sought in this INTERROGATORY or its subparts.

14 RESPONSE TO INTERROGATORY NO. 32:

15 Not applicable.

16 INTERROGATORY NO. 33:(CONTRACTOR DEFENDANTS only)

17 At any time between 1930 and 1985, did YOU hold a contractor's license in the State of
18 California? If so:

19 A. IDENTIFY each license by type, date and number.

20 B. If on the date of your answers YOU are a defendant in four or more
21 asbestos actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU
22 performed (directly or through one or more subcontractors) during this time period for work in
23 any PREMISES which is at issue as to YOU on such date, and in any PREMISES of 50,000
24 square feet or more in the GEOGRAPHIC AREA which job or contract involved installation,
25 removal, disturbing or handling RAW ASBESTOS or ASBESTOS-CONTAINING
26 PRODUCTS. (Alternatively, at your option, you may IDENTIFY each job or contract YOU
27 performed (directly or through one or more subcontractors) during this time frame for all work,
28

1 or for all work on PREMISES of 50,000 square feet or more, in the GEOGRAPHIC AREA.) As
2 to each such job or contract:

3 1. IDENTIFY the location (including name of ship, if applicable)
4 where the job or work was performed;

5 2. State the date of the contract or the inclusive dates of the work;

6 3. IDENTIFY the person or entity with whom you contracted;

7 4. State your job or contract number.

8 C. If on the date of your answers you are not a defendant in four or more
9 asbestos actions in San Francisco Superior Court, IDENTIFY each job or contract that YOU
10 performed (directly or through one or more subcontractors) during this time period for work in
11 any PREMISES which is at issue as to YOU on such date. As to each such job or contract:

12 1. IDENTIFY the location (including name of ship, if applicable)
13 where the job or work was performed;

14 2. State the date of the contract or the inclusive dates of the work;

15 3. IDENTIFY the person or entity with whom you contracted;

16 4. State your job or contract number.

17 RESPONSE TO INTERROGATORY NO. 33:

18 Not applicable.

19 INTERROGATORY NO. 34:

20 Did any of the distributors identified in your Answer to Interrogatory Nos. 29 and 31
21 above have an exclusive distributorship? If so, state the relevant time period.

22 RESPONSE TO INTERROGATORY NO. 34:

23 See response to Interrogatories Nos. 29 and 31.

24 INTERROGATORY NO. 35:

25 If THIS DEFENDANT entered into any agreements for the rebranding of any
26 ASBESTOS CONTAINING PRODUCTS by THIS DEFENDANT for resale or distribution by
27 another person or entity, describe each agreement's terms and the parties to said agreement, the
28

1 duration of the agreement, and name of each product(s) and/or material(s) covered by each such
2 agreement.

3 RESPONSE TO INTERROGATORY NO. 35:

4 See response to Interrogatory No. 36.

5 INTERROGATORY NO.36:

6 If THIS DEFENDANT entered into any agreements for the rebranding of ASBESTOS
7 CONTAINING PRODUCTS manufactured, sold, supplied or distributed by another person or
8 entity for resale or distribution by YOU, describe each of the agreements and the parties to said
9 agreement, the terms, the duration, and the names of each product(s) and/or material(s) covered
10 by each such agreement.

11 RESPONSE TO INTERROGATORY NO. 36:

12 This defendant believes that The Ruberoid Co. and GAF had three agreements relating to
13 cross-agreements with other companies from time to time between 1930 and 1979, which
14 agreements may have been, but are believed not to have been, applicable to sales of GAF
15 products in California: a relabeling agreement with the Grant Wilson Company, apparently in
16 the 1930s generally applicable to the sales of certain products, primarily in the midwestern area
17 of the United States; and agreement under which Baldwin-Ehret-Hill produced 313 and 412
18 insulating cements nationally or GAF from time to time from 1960 until 1971; and, an agreement
19 with Armstrong Contracting and Supply Company, Lancaster, Pennsylvania, in 1963 under
20 which Ruberoid agreed to sell certain products to the Company and attach that Companys labels,
21 as and when directed. Other such arrangements may have been undertaken from time to time; for
22 example, Ruberoid purchased raw asbestos from Johns-Manville and others, for resale,
23 commencing in the early 1950s.

24 At various times, Ruberoid product brochures and advertising listed for sale asbestos-
25 containing products not known to have been manufactured by Ruberoid, including 85%
26 magnesia and diatomaceous earth products, but which may have been manufactured for
27 Ruberoid. This defendant is aware of no sales documents with respect to these products, the year
28 of any sale of any such products or of any specific sale. However, this defendant is aware

1 through litigation of individual Ruberoid labels upon sections of pipe covering indicating that the
2 material was 85% magnesia pipe covering manufactured for Ruberoid by Plant Rubber and
3 Asbestos Company, and perhaps others. It is believed that this material dates from the late
4 1930s.

5 Some VAT was labeled for mass market retailers, such as Sears and K-Mart.

6 INTERROGATORY NO.37:

7 As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING PRODUCT
8 listed in YOUR responses to Interrogatories No. 29 and 31 did DEFENDANT warn of the health
9 hazards of asbestos? If so, state for each such warning:

10 A. The content, size, color, and location; whether the warning appeared on
11 the material and/or on the container, and/or was placed on a tag; whether the warning was
12 included in contracts; whether the warning was included in advertising or other promotional
13 materials.

14 B. State whether you have any photographs thereof;

15 C. The inclusive dates on which you used each such warning;

16 D. State all changes you made in such warnings and the dates of such
17 changes; and

18 E. Identify the person most knowledgeable about your warnings and warning
19 policy.

20 RESPONSE TO INTERROGATORY NO. 37:

21 This defendant responds that, in approximately 1964, The Ruberoid Co. began placing
22 the following warning notices on packages of its asbestos-containing industrial thermal
23 insulation products:

24 //

25 //

26 //

27 //

28 //

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

GAF placed warning labels on packaging of asbestos fiber and insulation cements by 1968, and on millboard, rollboard and asbestos paper products, as well as relocating the warning label for Calsilite pipe covering and block products from the sides to the front of the carton, by 1970. This warning label read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

AVOID BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUST.

In approximately 1972, this warning was further changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBER. AVOID BREATHING DUST.
BREATHING ASBESTOS MAY CAUSE SERIOUS BODILY HARM.

In 1978, warning labels were placed on individual sheets of millboard.

Until 1972, GAF's use of these warnings followed major manufacturers in the industry which used such cautionary notices after certain opinions were expressed by some members of the medical profession that there might be a health risk to some persons who installed industrial thermal insulation products containing asbestos from the inhalation of excessive quantities of

1 asbestos fibers over prolonged periods of time under certain conditions. Commencing in 1972,
2 pursuant to the requirements of the Occupational Safety and Health Act of 1970, GAF placed the
3 last notice set out above.

4 All observers of this packaging, whether purchasers, users, handlers, distributors, or
5 contractors, would have seen, and thus received, the warnings as set forth above.

6 This defendant identifies William C. Schwingen and Phillip S. Bettoli as persons with
7 knowledge.

8 With respect to floor tile, beginning in or about 1976-1977, GAF included a 5-inch by 7-
9 inch paper insert inside cartons of its vinyl asbestos-containing floor tile (VAT) which read as
10 follows:

11
12 WARNING:

13 DO NOT SAND EXISTING RESILIENT FLOORING, BACKING OR LINING FELT.
14 INHALATION OF RESULTING DUST CONTAINING ASBESTOS MAY BE INJURIOUS
15 TO YOUR HEALTH.

16 In 1978, the warning was revised to read as follows:

17
18 ALTHOUGH MUCH RESILIENT FLOOR COVERING PRODUCED BY MANY
19 MANUFACTURERS CONTAINS ASBESTOS, ASBESTOS FIBERS THAT ARE BOUND
20 INTO MATERIAL DO NOT PRESENT A HAZARD TO THE CONSUMER. HOWEVER, IF
21 SUCH FLOOR COVERING IS SANDED DURING REMOVAL OR PREPARATION FOR
22 NEW INSTALLATION, EXPOSURE TO FIBERS MAY RESULT. DO NOT SAND
23 EXISTING RESILIENT FLOORING, BACKING OR LINING FELT. INHALATION OF THE
24 RESULTING DUST MAY CAUSE SERIOUS BODILY HARM.

25 Furthermore, the warning, as revised in 1978, was printed in books displaying the various
26 colors, styles and patterns of GAF's flooring products which GAF sent or otherwise distributed to
27 architects, various flooring installer unions, and other persons for their use. Warnings of this
28 type were also included in other literature printed by GAF which dealt with the installation or
removal of VAT. In addition, oral and written warnings of this type were given to installers and
removers at seminars given by GAF at its Floor Craftsmen's Training School. Moreover, GAF

1 was a member of the Resilient Floor Covering Institute ("RFCI"), which developed,
2 promulgated, and distributed recommended work practices concerning the installation,
3 maintenance and removal of VAT beginning in 1980. RFCI's Recommended's Work Practices
4 included a warning against sanding.

5 This defendant identifies Theodore Dean as a person with knowledge.

6 INTERROGATORY NO.38:

7 With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS, state
8 whether THIS DEFENDANT's name, a trademark, logos, color coding, or other identifying
9 markings ever appeared on this actual product itself. If so, IDENTIFY each such product, state
10 when the practice to place such identifying markings upon the product was begun and when it
11 ended, if applicable, and describe in detail the pertinent marking(s) and the purpose, if any, of
12 such markings.

13 RESPONSE TO INTERROGATORY NO. 38:

14 This defendant responds that it complied with Government specifications concerning
15 product form, content, packaging and labeling for products to be used in Government-owned and
16 sponsored projects and facilities. This defendant's name and logo, as they changed over the
17 years, generally appeared on the packaging of defendant's products. This defendant affixed
18 warnings, as are described in the response to Interrogatory No. 37.

19 INTERROGATORY NO. 39:

20 Between the years 1930 to 1985, did THIS DEFENDANT purchase or otherwise acquire
21 any ASBESTOS-CONTAINING PRODUCT lines from another person or entity? If so, state for
22 each such purchase:

- 23 A. Date of purchase or acquisition;
24 B. Terms of purchase or acquisition agreement;
25 C. Either (1) attach all DOCUMENTS evidencing said acquisition, or (2)
26 attach disks containing such data, or (3) describe such DOCUMENTS with sufficient
27 particularity that they may be made the subject of a request for production of documents.
28 D. Trade, brand, and/or generic name of each such product line so acquired;

1 E. Name of the person or entity from whom YOU purchased or acquired each
2 such ASBESTOS-CONTAINING PRODUCT line; and

3 F. Location of any manufacturing facilities so acquired, and the type of
4 ASBESTOS-CONTAINING PRODUCTS manufactured therein.

5 RESPONSE TO INTERROGATORY NO. 39:

6 This defendant responds that it purchased the Vermont mine and mill in 1937 from the
7 Vermont Asbestos Company, and will make available relevant documents. The words Vermont
8 Asbestos appeared on many of the bags shipped from the Vermont mill.

9 Prior to the 1967 acquisition by General Aniline & Film, Ruberoid manufactured
10 asbestos-containing floor products using the HAKO tradename rights acquired through the
11 Mastic Tile Corporations merger with Hachmeister, Inc. in 1956. In addition, Ruberoid
12 manufactured floor tile under Moultile and Aristo-Flex brand names which were obtained as a
13 result of the acquisition of the rights and patent formulas from the Thos. Moulding Floor
14 Manufacturing Company in 1951. Production of the Matico tradename alone by Ruberoid was
15 acquired in the merger with Mastic Tile Corporation.

16 Mastic Tiles production of asbestos-containing floor tile began in 1945 and continued as
17 late as 1960. Production included such brand names as Moulflex, Moultried, Marvlon, Dramatile,
18 Dramacarts, Chemproof and Marbletred. Both Chemproof and Marbletred brand names were
19 obtained as a result of the acquisition of the rights and patent formulas from the Thos. Moulding
20 Floor Manufacturing Company.

21 Hachmeister, Inc.'s production of asbestos-containing floor tile began in 1945 and
22 continued until 1956. Additional Hachmeister floor tile products during that time included
23 Green Label Mastic and Vinyl-Flex.

24 Thos. Moulding Floor Manufacturing Companys production of asbestos-containing floor
25 tile began in 1920 and continued until 1951. Moulstone floor tile was manufactured during that
26 period of time.

27 The Sandura Company, principally a manufacturer of sheet vinyl flooring, was acquired
28 in 1965.

1 The asbestos-Portland cement siding and shingle described in response to Interrogatory
2 No. 31 were acquired from Eternit, Inc., in 1932.

3 INTERROGATORY NO. 40:

4 Between the years 1930 to 1985, did THIS DEFENDANT sell any ASBESTOS-
5 CONTAINING PRODUCT line to another person or entity? If so, state for each such sale:

- 6 A. Date of sale;
- 7 B. Terms of sales agreement;
- 8 C. Either (1) attach all DOCUMENTS evidencing said sale, or (2) attach
9 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
10 they may I be made the subject of a request for production of documents.
- 11 D. Trade, brand, and/or generic name of each such product line sold;
- 12 E. Name of person or entity to whom you sold each such ASBESTOS-
13 CONTAINING PRODUCTS line; and
- 14 F. Location of any manufacturing facilities so sold, and the type of
15 ASBESTOS CONTAINING PRODUCTS manufactured therein.

16 RESPONSE TO INTERROGATORY NO. 40:

17 This defendant responds that it sold the Vermont mine and mill to the Vermont Asbestos
18 Group, a group of former mine employees, in March of 1975.

19 The Erie paper making facility was sold in November, 1981, to the Quin-T Corporation.

20 The Floor Products Division was sold to Tarkett, Inc., in September, 1981.

21 INTERROGATORY NO.41:

22 IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to
23 ASBESTOS-CONTAINING PRODUCTS and/or RAW ASBESTOS which THIS
24 DEFENDANT manufactured, sold, distributed or supplied from the year 1930 to 1985. For each
25 such document, state:

- 26 A. A description of the document;
- 27 B. The year it was printed;
- 28 C. The period of time in which it was used;

- 1 D. The purpose of such document;
- 2 E. Whether the documents or copies of said documents presently exist;
- 3 F. If said documents or copies still exist, where they are located; and
- 4 G. The IDENTITY of the custodian of such documents.

5 RESPONSE TO INTERROGATORY NO. 41:

6 This defendant states that The Ruberoid Co. (and later GAF) presented product and
7 technical information in trade and other magazines, and maintained entries in Sweet's Catalog
8 Files. Advertisements for this defendant's asbestos-containing industrial thermal insulation
9 products also appeared in the magazine Asbestos.

10 INTERROGATORY NO.42:

11 State if YOU have or had within YOUR corporate or other business structure any
12 CONTRACT UNITS.

13 RESPONSE TO INTERROGATORY NO. 42:

14 No.

15 INTERROGATORY NO.43:

16 State whether or not any of YOUR CONTRACT UNITS installed and/or removed RAW
17 ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in the GEOGRAPHIC AREA at
18 any time between 1930 and 1985. If so:

- 19 A. State the business addresses and none of the CONTRACT UNIT;
- 20 B. State the inclusive periods of time the CONTRACT UNITS was working
21 in the GEOGRAPHIC AREA;
- 22 C. State the name and address of each job site within the GEOGRAPHIC
23 AREA and the dates the CONTRACT UNIT worked at those job sites, and, IDENTIFY the
24 RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS installed or removed on
25 each occasion;
- 26 D. Either (1) attach all DOCUMENTS evidencing the information sought in
27 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
28

1 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
2 may be made subject of a request for production of documents.

3 RESPONSE TO INTERROGATORY NO. 43:

4 Not applicable.

5 INTERROGATORY NO.44:

6 When do YOU contend that THIS DEFENDANT first became aware that there is an
7 association between asbestos exposure and disease in human beings?

8 RESPONSE TO INTERROGATORY NO. 44:

9 This defendant responds that, prior to 1964, it is aware of no information that Ruberoid
10 officials knew of health hazards from asbestos to users of its asbestos-containing industrial
11 thermal insulation products. In approximately 1964, Ruberoid became aware of opinions
12 expressed by some members of the medical profession that inhalation of asbestos dust in
13 excessive quantities which might be released while using asbestos-containing thermal insulation
14 products over long periods of time could be harmful, although the opinion did not relate to the
15 use of Ruberoid products. At approximately the same time, Ruberoid commenced providing its
16 warnings. In approximately 1968, GAF received further information that inhalation of asbestos
17 fibers in general could be harmful but GAF did not receive medical information specific to the
18 type of products then being manufactured by GAF.

19 INTERROGATORY NO.45:

20 How do YOU contend that THIS DEFENDANT first became aware that there is an
21 association between asbestos exposure and disease in human beings.

22 RESPONSE TO INTERROGATORY NO. 45:

23 This defendant responds that, prior to 1964, it is aware of no information that Ruberoid
24 officials knew of health hazards from asbestos to users of its asbestos-containing industrial
25 thermal insulation products. In approximately 1964, Ruberoid became aware of opinions
26 expressed by some members of the medical profession that inhalation of asbestos dust in
27 excessive quantities which might be released while using asbestos-containing thermal insulation
28 products over long periods of time could be harmful, although the opinion did not relate to the

1 use of Ruberoid products. At approximately the same time, Ruberoid commenced providing its
2 warnings. In approximately 1968, GAF received further information that inhalation of asbestos
3 fibers in general could be harmful but GAF did not receive medical information specific to the
4 type of products then being manufactured by GAF.

5 INTERROGATORY NO.46:

6 Either (1) attach all DOCUMENTS evidencing the information upon which YOUR
7 contentions in YOUR answers to Interrogatories No. 44 and No. 45 are based, or (2) attach disks
8 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
9 may be made the subject of a request for production of documents.

10 RESPONSE TO INTERROGATORY NO. 46:

11 GAF agrees to produce at a mutually convenient date and location.

12 INTERROGATORY NO.47:

13 When did THIS DEFENDANT first warn its employees that exposure to asbestos could
14 be hazardous to human health? State:

- 15 A. Whether the first such warning was written or oral;
16 B. Whether copies of DOCUMENTS containing such warning exist;
17 C. The IDENTITY of the custodian of such DOCUMENTS;
18 D. The content of the warning.

19 RESPONSE TO INTERROGATORY NO. 47:

20 This defendant responds that, in approximately 1964, The Ruberoid Co. began placing
21 the following warning notices on packages of its asbestos-containing industrial thermal
22 insulation products:

23
24

CAUTION

25 THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN
26 EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

27 IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE
28 DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR
RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS
PRODUCING DUST.

1 GAF placed warning labels on packaging of asbestos fiber and insulation cements by
2 1968, and on millboard, rollboard and asbestos paper products, as well as relocating the warning
3 label for Calsilite pipe covering and block products from the sides to the front of the carton, by
4 1970. This warning label read as follows:

5
6

CAUTION
7 CONTAINS ASBESTOS FIBER. INHALATION IN EXCESSIVE QUANTITIES OVER
8 LONG PERIODS OF TIME MAY BE HARMFUL.
9 AVOID BREATHING DUST. IF ADEQUATE VENTILATION IS NOT POSSIBLE, WEAR
10 RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS
11 PRODUCING DUST.
12

13 In approximately 1972, this warning was further changed to read as follows:

14

CAUTION
15 CONTAINS ASBESTOS FIBER. AVOID BREATHING DUST.
16 BREATHING ASBESTOS MAY CAUSE SERIOUS BODILY HARM.
17

18 In 1978, warning labels were placed on individual sheets of millboard.

19 Until 1972, GAF's use of these warnings followed major manufacturers in the industry
20 which used such cautionary notices after certain opinions were expressed by some members of
21 the medical profession that there might be a health risk to some persons who installed industrial
22 thermal insulation products containing asbestos from the inhalation of excessive quantities of
23 asbestos fibers over prolonged periods of time under certain conditions. Commencing in 1972,
24 pursuant to the requirements of the Occupational Safety and Health Act of 1970, GAF placed the
25 last notice set out above.

26 All observers of this packaging, whether purchasers, users, handlers, distributors, or
27 contractors, would have seen, and thus received, the warnings as set forth above.

28 See also, response to Interrogatory No. 37.

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1 INTERROGATORY NO.48:

2 Did THIS DEFENDANT ever issue a written COMPANY policy discontinuing warning
3 its employees that exposure to asbestos could be hazardous to human health? If so,

4 A. Provide the date;

5 B. Describe the circumstances; and

6 C. Either (1) attach all DOCUMENTS evidencing the information sought in
7 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
8 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
9 may be made the subject of a request for production of documents.

10 RESPONSE TO INTERROGATORY NO. 48:

11 This defendant responds, no, and further denies that it ever discontinued warning its
12 employees.

13 INTERROGATORY NO.49:

14 Did THIS DEFENDANT provide any Independent Contractor or Subcontractor within
15 the GEOGRAPHIC AREA with a written warning that exposure to asbestos could be hazardous
16 to human health.

17 RESPONSE TO INTERROGATORY NO. 49:

18 This defendant responds, yes.

19 INTERROGATORY NO.50:

20 Has THIS DEFENDANT been cited for or otherwise charged by a public agency with a
21 violation in the GEOGRAPHIC AREA of any statute, ordinance, safety order, regulation, or law
22 pertaining to asbestos exposure? For each occasion, IDENTIFY:

23 A. The code section, safety order, statute, or regulation for which THIS
24 DEFENDANT had been cited or otherwise charged;

25 B. The date(s) thereof.

26 C. The agency or other governmental unit which issued the citation or
27 otherwise charged YOU.

28 D. All persons known to YOU with information relevant to the incident.

1 E. What was the ultimate resolution.

2 RESPONSE TO INTERROGATORY NO. 50:

3 This defendant responds, no.

4 INTERROGATORY NO. 51:

5 If THIS DEFENDANT has ever owned or operated a railroad, state:

6 A. The IDENTITY of each such railroad, including the name(s) of such
7 railroad during the time period of YOUR ownership and/or operation, the principal place of
8 business of such railroad and the dates of YOUR ownership and/or operation;

9 B. The geographic area of operation of such railroad;

10 C. The name(s) of such railroad prior to YOUR ownership and/or operation;

11 D. The IDENTITY of the person or entity from whom YOU purchased your
12 ownership or operating interest, and the date of such purchase;

13 E. The IDENTITY of the person or entity to whom YOU sold your
14 ownership or operating interest, and the date of such sale;

15 F. Whether copies of DOCUMENTS evidencing your ownership/operation,
16 and/or sale exist;

17 G. The IDENTITY of the Custodian of such DOCUMENTS;

18 H. To the extent that information has not been given in answers to
19 Interrogatory Nos. 32 and 33, the information requested in Interrogatory Nos. 32 and 33, for each
20 railroad owned or operated by YOU.

21 RESPONSE TO INTERROGATORY NO. 51:

22 Not applicable.

23 INTERROGATORY NO. 52:

24 If DEFENDANT has ever owned or operated a shipyard, state:

25 A. The IDENTITY of each such shipyard, including the name(s) of such
26 shipyard during the time period of YOUR ownership and/or operation, the place of business of
27 such shipyard and the dates of YOUR ownership and/or operation;

28 B. The name(s) of such shipyard prior to YOUR ownership and/or operation;

1 C. The IDENTITY of the person or entity to whom YOU sold your
2 ownership or operating interest, and the date of such sale;

3 D. Whether copies of DOCUMENTS evidencing your ownership/operation
4 and/or sale exist;

5 E. Whether any representative of THIS DEFENDANT attended the Maritime
6 Commission Conference in December 1942 in Chicago, Illinois? If so, IDENTIFY any such
7 representative of THIS DEFENDANT;

8 F. The IDENTITY of the Custodian of such DOCUMENTS;

9 G. To the extent that information has not been given in answers to
10 Interrogatory No. 32, the information requested in Interrogatory No. 32, for each shipyard owned
11 or operated by YOU.

12 RESPONSE TO INTERROGATORY NO. 52:

13 Not applicable.

14 INTERROGATORY NO. 53:

15 At any time between 1930 and 1985, did you import, export, ship, transship or otherwise
16 transport RAW ASBESTOS or ASBESTOS- CONTAINING PRODUCTS into, out of or
17 through any port in the GEOGRAPHIC AREA? If so, for each occasion:

18 A. IDENTIFY and describe the NATURE and amount of RAW ASBESTOS
19 and/or ASBESTOS-CONTAINING PRODUCTS;

20 B. IDENTIFY the ship or ships (including the owners and operators thereof)
21 onto or from which the RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS
22 were loaded, unloaded or transshipped;

23 C. State the dates, port and pier involved for each occasion;

24 D. Either (1) attach all DOCUMENTS evidencing the information sought in
25 this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach disks
26 containing such data, or (3) describe such DOCUMENTS with sufficient particularity that they
27 may be made , the subject of a request for production of documents.

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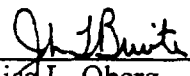
RESPONSE TO INTERROGATORY NO. 53:

As to importing, this defendant responds, not applicable.

As to exporting, this defendant responds, not applicable.

DATED: November 18, 1997

HAIGHT, BROWN & BONESTEEL, L.L.P.

By 

Lisa L. Oberg
John T. Burnite
Attorneys for THE CENTER FOR CLAIMS
RESOLUTION DEFENDANTS including
GAF CORPORATION

1 PROOF OF SERVICE BY MAIL

2 STATE OF CALIFORNIA)

3 COUNTY OF SAN FRANCISCO)

ss.:

4 I am employed in the County of San Francisco, State of California. I am over the age of
5 18 and not a party to the within action. My business address is 100 Bush Street, 27th Floor, San
6 Francisco, CA 94104.

7 On November 18, 1997, I served on interested parties in said action the within:

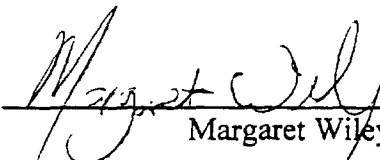
8 **GAF CORPORATION'S AMENDED RESPONSES TO GENERAL ORDER NO.**
9 **129 INTERROGATORIES**

10 by placing a true copy thereof enclosed in sealed envelope(s) addressed as stated on the
11 attached mailing list and depositing such envelope(s) for collection and mailing by
12 placing them in a postal box in my work area.

13 I am "readily familiar" with this firm's practice of collection and processing
14 correspondence for mailing. Under that practice it would be deposited with U.S. postal service
15 on that same day in the ordinary course of business. I am aware that on motion of party served,
16 service is presumed invalid if postal cancellation date or postage meter date is more than 1 day
17 after date of deposit for mailing in affidavit.

18 Executed on November 18, 1997, at San Francisco, California.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 
22 Margaret Wiley
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IN RE COMPLEX ASBESTOS LITIGATION SERVICE LIST

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GAF Corporation
G.O. 129 ROG responses

11/18/97