

LAW OFFICES OF
HARVEY, KRUSE, WESTEN & MILAN, P.C.
1590 FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226

313-964-3100
FAX 313-964-0587

RICHARD A. HARVEY
JOHN A. KRUSE
RONALD E. WESTEN
JOHN F. MILAN
DANE A. LUPO
DENNIS M. GOEBEL
PAUL S. HYNES
MICHAEL F. SCHMIDT
GARY A. MAXIMIA
THOMAS R. BOWEN
A. BY B. DEYRIES
FRANCIS H. PORRETTA
GEORGE W. STEEL
JAMES SURRAB
LARRY W. DAVIDSON
PAUL S. KOCZUR
THOMAS F. KAIZA
DALE R. BURMEISTER

800 WEST LONG LAKE ROAD
SUITE 160
BLOOMFIELD HILLS, MICHIGAN 48303
313-964-3100

60 MONROE CENTER NW
SUITE 300
GRAND RAPIDS, MICHIGAN 49503
616-235-0308

6-4086 PIER NORTH BLVD.
FLINT, MICHIGAN 48506
313-230-1000

GARY L. STEC
STEPHEN P. VELLA
CHARLES F. BOCKELCO
PAUL J. WIDZINSKI
MARISA C. RETRELLA
RYAN A. HUSATNU
TERRY J. PAWLOWSKI
MARY ROYRE BEHEDETTO
ALAN G. EDWARDS
MAURICE A. BORDEN
LISA F. WILTON
AMRICO D. RINTO
JOHN W. VINCENT
CHRISTOPHER E. BENCAS
BRADLEY S. WITSEFF

OF COURSE,
JOHN GERALD DILLON

March 10, 1987

TO: All Plaintiffs' Attorneys
On All Asbestos Cases

Gentlemen:

Enclosed, for the above-entitled cause of action, please find:

*** United States Gypsum Company's Amended Response to Certain
of Plaintiffs' Standard Interrogatories to Defendants

Very truly yours,


Ronald E. Westen

REW:sp

cc: All Defense Attorneys

If you would like a copy of the above, kindly contact me and
I will be happy to supply you with a copy.

Enclosure



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

IN RE: ALL "ASBESTOS" CASES PRESENTLY
PENDING BEFORE AND ALL FUTURE CASES
ASSIGNED TO THE HONORABLE JAMES E. MIES,
CIRCUIT COURT JUDGE

UNITED STATES GYPSUM COMPANY'S AMENDED RESPONSE TO
CERTAIN OF PLAINTIFFS' STANDARD INTERROGATORIES TO DEFENDANTS

Defendant United States Gypsum Company hereby files the following amended responses to Plaintiffs' Standard Interrogatories.

5. This defendant has never mined, milled or sold raw asbestos at any time. With respect to manufacture and sale of asbestos-containing products:

<u>Date Incorporated</u>	<u>Date Dissolved</u>	<u>Name</u>	<u>State</u>
12/27/01	8/23/20	United States Gypsum Company	NJ
8/23/20	10/14/27	Avery Gypsum Company	NJ
8/12/20	12/24/36	United States Gypsum Company	IL
12/24/36	8/--/52	United States Gypsum Company	DE
8/--/52	2/04/66	United States Gypsum Company	IL
2/04/66	7/01/66	USG Corporation	DE
7/01/66	--/--/--	United States Gypsum Company	DE

United States Gypsum Company acquired the assets of National Asbestos Manufacturing Company in 1936. National Asbestos Manufacturing Company was located in New Jersey and no longer exists as a corporate entity. Said company was a producer of asbestos-containing pipecovering.

United States Gypsum Company acquired A. P. Green of Missouri in 1966. A. P. Green is located in Mexico, Missouri, and continues to exist as a separate and independent corporate entity. Said company is primarily a manufacturer of refractory products. A small percentage of the products it manufactured or sold contained asbestos as part of their formulations.

United States Gypsum Company acquired the assets of Chicago Mastic Company, a manufacturer of adhesives, in 1971.

For affiliated companies, see attached Exhibit E.

12. For a list of asbestos-containing products manufactured by this Defendant, see attached Amended Exhibit A.

A. See attached Amended Exhibit A and Exhibit F.

B, C and E. See attached Amended Exhibit A.

D and F. This defendant does not maintain its sales records in such a manner as to indicate the end user of a given product. This defendant's sales of its products are generally conducted through distributors.

Further, this defendant has no sales records for the years prior to 1966. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606, pursuant to a properly filed motion to produce.

13. A-C See attached Amended Exhibit A.

D. Objection. Information sought by this Interrogatory constitutes confidential trade secrets. Without waiving this objection, this defendant used chrysotile asbestos in its asbestos-containing products. For the percentage of asbestos used in this defendant's asbestos-containing products, see attached Exhibit G.

E. For uses of this defendant's asbestos-containing products, see Amended Exhibit A.

With respect to temperature ranges, the only relevant products are as follows:

K-FAC: 1000 degrees Fahrenheit

K-FAC 19: 1900 degrees Fahrenheit

Spraydon Powercote: 1600 degrees Fahrenheit

F. See attached Exhibit H.

G. All products listed in attached Amended Exhibit A, except SprayDon spray fireproofing which was manufactured for Sprayon Research Corporation, were manufactured and sold by this defendant. Also, see this defendant's response to Interrogatory Numbers 22, 24, and 26.

H. Plasters, fireproofing, acoustical materials, asbestos cements, textures and non-ready-mixed joint compounds had to be mixed with water at the jobsite. Pipecoverings and rigid block insulation may have had to be cut or molded to fit at the jobsite.

I. See attached Exhibit I.

J. See attached Exhibit H.

K. See this defendant's original responses to Plaintiffs' Standard Interrogatories.

L. See this defendant's original responses to Plaintiffs' Standard Interrogatories.

M. See this defendant's original responses to Plaintiffs' Standard Interrogatories.

14. See this defendant's response to Interrogatory Numbers 30 and 31 in each individual case.

21. The following are known to have been approved suppliers of asbestos: Canadian Johns-Manville, Lake Asbestos of Quebec, Nicolet Industries, Carey Canadian, Asbestos Corporation, Atlas Asbestos, Union Carbide, and Pacific Asbestos. Atlas Asbestos and Pacific Asbestos shipped only to California. It is unknown which source of supply was used for any particular product, at which mines the raw asbestos was mined, and from which locations the raw asbestos was shipped. U. S. Gypsum has located no documentation to ascertain from which particular supplier asbestos was purchased prior to 1975. For the years 1975 and 1976, U. S. Gypsum has located some records of purchase of asbestos. U. S. Gypsum used chrysotile asbestos in its products that contained asbestos.

22. In the 1950's - 1970's, U. S. Gypsum purchased asbestos cement board from National Gypsum Company, which was reshipped as received. In addition, U. S. Gypsum drilled this material and rebranded it for sale and use as asbestos lay-in panels in the late 1950's. U. S. Gypsum also purchased pipe covering from a company believed to be named Baldwin-Ehret-Hill in the 1930's.

23. See this defendant's response to Interrogatory No. 22.

24. This defendant is presently aware that it manufactured an asbestos-containing product for National Gypsum Company, for Brickstone Company, for A. P. Green Refractories Company, and for Sprayon Research Corporation. Those products and their production years are as follows:

Colored Exterior Stucco

(National Gypsum Company, mid-1940's through 1970's)

Exterior Finish Stucco

(Brickstone Company, mid-1960's to late 1960's)

High Temperature Block Insulation

(A. P. Green Refractories Company, 1970-1971)

SprayDon Fireproofing *(Sprayon Research Corporation
1966-1971)

*Sold and distributed by Sprayon Research Corporation
and Metropolitan Spray Inc., and manufactured according to
Spraydon specifications by this defendant.

25. See this defendant's response to Interrogatory No. 22.

26. See this defendant's response to Interrogatory No. 24.

34. To this defendants' best current knowledge and belief,
it has not retained any consultant to specifically advise this
defendant regarding asbestos. In the 1930's this defendant
retained Dr. Leroy Gardner to conduct surveys of nuisance dust
conditions in several of this defendant's plants, one dust of
which was asbestos. Further, other surveys have been conducted
at some of this defendant's manufacturing facilities. These
surveys dealt with nuisance dusts, one of which may have been
asbestos.

35. This defendant employed an industrial hygienist, F.
Tremmel, on August 4, 1986.

38. See this defendants' original answers to Plaintiffs'
Standard Interrogatories. Further, see attached Exhibit J.

39. In 1936, U. S. Gypsum began to require medical
examinations for certain applicants for permanent employment at
certain U. S. Gypsum facilities. In 1937, U. S. Gypsum
instituted a policy that required that a complete

occupational and medical record be taken of all men seeking employment. This policy also required that specific reference be made on the application to previous exposures to dust, particularly asbestos or silica dust. In 1954, U. S. Gypsum required that its employees regularly exposed to asbestos in the course of employment be x-rayed annually.

U. S. Gypsum will make available for plaintiff's inspection the first bulletins regarding these programs and all successor bulletins. Those documents will be made available at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois.

49. This defendant is aware that it may have contributed to a study conducted in approximately 1936 concerning the health effects of inhalation of asbestos fibers by Dr. Leroy Gardner, M.D. of the Saranac Lake Laboratory.

A. To this defendant's best current knowledge, information and belief there were numerous participants in the study conducted by Dr. Gardner. This defendant believes that C. A. Shaver signed a "Memorandum of Agreement" with respect to said study on behalf of United States Gypsum Company.

B. Dr. Leroy Gardner, Saranac Lake Laboratory.

C. To this defendant's best current knowledge, information, and belief, said study was begun in approximately 1936 and that what appears to be the final report of said study was written in 1949.

D. In response to this interrogatory, all documents relating to said study in the defendant's possession will be made available for review at a mutually convenient time at 101

South Wacker Drive, Chicago, Illinois 60606.

E. In response to this interrogatory, all documents relating to said study in the defendant's possession will be made available for review at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

F. A progress report on said study was received by J. S. Offutt. Also, see 49A above. Further information responsive to this Interrogatory is unknown.

G. This defendant is in possession of the following responsive documents:

1. Letter from Brown to Offutt (May 11, 1937).
2. First progress report of Dr. Gardner's studies.
3. 1949 report on Dr. Gardner's studies.
4. Letter from Offutt to King (May 5, 1937).

The 1936 "Memorandum of Agreement" has never been located in Company files. A copy has been obtained by this defendant's attorneys.

H. A document dated 1949 which this defendant believes to be the final report of said study will be made available at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606. This defendant is not aware if said report was published.

60. See this defendant's original response to this Interrogatory and the attached referenced exhibit. Documents listed in this defendant's original response to Plaintiffs' Standard Interrogatories, as well as any responsive documents subsequently identified by this defendant will be made available for review at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

61. See this defendant's original response to this Interrogatory and the attached referenced exhibit. Documents listed in this defendant's original response to Plaintiffs' Standard Interrogatories, as well as any responsive documents subsequently identified by this defendant will be made available for review at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

70. With respect to products identified in the Prefatory Statement, see this defendant's Amended Response to Interrogatory Nos. 12 and 13.

Further, the following appeared on joint compound packaging, consistent with proposed OSHA standards, in 1972 and on textures in 1973:

"Caution: Contains Asbestos Fibers. Avoid Creating Dust. Breathing Asbestos Dust May Cause Serious Bodily Harm."

Additionally, the following was imprinted on joint compound packaging in approximately 1974:

"Observe the following precautions: Wet sanding or sponging finished joints is recommended rather than dry sanding to avoid creating dust. If dry sanding, mixing, or otherwise working in a dusty atmosphere containing this material, ventilate, use dust collector, or wear eye protection and a respirator approved by the Bureau of Mines, or NIOSH, to remove nuisance dust."

Concerning SprayDon, a product sold and distributed by Sprayon Research Corporation, manufactured by U. S. Gypsum according to that company's specifications, the following

appeared on SprayDon bags in approximately June 1966.

"Contains Asbestos"

The following appeared on SprayDon in subsequent years.

"Caution: This product contains asbestos." (1968)

"Caution: This product contains asbestos, which may be harmful to lungs if inhaled." (1969)

76. Relevant documents which have been identified by this defendant as responsive to this Interrogatory will be made available at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

90. See attached Exhibit F and the defendant's amended response to Interrogatory No. 39.

98. This defendant was first named in a lawsuit involving allegations of asbestos-induced disease in approximately 1975.

104. Subsequent to this defendant's original responses to Plaintiffs' Standard Interrogatories, the following U. S. Gypsum employees or former employees have been deposed in asbestos personal injury litigation.

E. C. Beuthin, former employee, Kelln v. U. S. Gypsum, et al., Circuit Court Ozaukee County, Wisconsin, No.

83-CV-809-B1. Deposed in Las Vegas, Nevada on August 22, 1985.

H. J. Bowman, Manager, Corporate Quality Assurance, Hawkins v. Celotex, et al., No. 85 CV 08 4598, Court of Common Pleas, Franklin County, Ohio. Deposed in Chicago, Illinois on August 8, 1985.

D. M. Dierson, former Manager, Mineral Fiber Division,
Morgan v. National Gypsum Company, et al., No. 83-1963, U.S.D.C.
for District of Columbia. Deposed in Chicago, Illinois on
January 2, 1986.

Amended Exhibit A

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Sabinite	Acoustical Plaster	1930	*1964	Fort Dodge, IA
		1930	1945	Midland, CA
		1930	1945	East Chicago, IN
		1930	*1964	New Brighton, NY
		1930	1945	Gypsum, OH
Audicote	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Hi-Lite	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Red Top Trowel Finish	Finish Plaster	1930	1935	Gypsum, OH
		1930	1935	East Chicago, IN
		1950	1951	Fort Dodge, IA New Brighton, NY Fort Dodge, IA
Oriental Interior Finish Plaster	Finish Plaster	1942	1972	Oakfield, NY
		1942	1972	Fort Dodge, IA
		1942	1972	New Brighton, NY
		1942	1972	Sweetwater, TX
		1942	1944	Boston, MA
				Gypsum, OH
		1949	1950	Philadelphia, PA
		1949	1972	Jacksonville, FL Norfolk, VA Philadelphia, PA
Red Top Cover Coat	Finish Plaster	1942	1954	Southard, OK
Red Top Patching Plaster	Finish Plaster	1929	1947	Gypsum, OH
				New Brighton, NY
		1942	1946	Nephi, UT
		1942	1951	Milwaukee, WI
		1944	1947	South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	<u>(Dates Approximately)</u>		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Red Top Wood Fiber Plaster - Regular	Basecoat	1945	1972	East Chicago, IN
				Heath, MI
		1945	1952	Nephi, UT
		1945	1959	Midland, CA
		1945	1963	Fort Dodge, IA
		1945	1963	Detroit, MI
		1945	1965	Sweetwater, TX
		1945	1966	Loveland, CO
		1945	1967	Southard, OK
		1945	1960	Plaster City, CA
		1948	1952	Gerlach, NV
		1948	1972	Sigurd, UT
		1952	1960	Empire, NV
Red Top Wood Fiber Plaster - Machine Application	Basecoat	1959	1961	Plaster City, CA
		1972	1972	East Chicago, IN
Cement Plaster Regular. Name changed to Gypsum Plaster 7/67; to Red Top Gypsum Plaster 11/68	Basecoat	1943	1947	Loveland, CO
Red Top Cement Plaster for Machine Application. Name changed to Red Top Gypsum Plaster for Machine Application 7/67	Basecoat	1962	1966	Gypsum, OH
		1962	1966	Detroit, MI
		1964	1966	Oakfield, NY
Red Top Structo-Lite Gypsum Plaster for Machine Application	Basecoat	1955	1962	Boston, MA
				Detroit, MI
				East Chicago, IN
				Fort Dodge, IA
				Gypsum, OH
				Jacksonville, FL
				Loveland, CO
				New Brighton, N
				Norfolk, VA
				Oakfield, NY
				Philadelphia, P
				Plasterco, VA

<u>Product Name</u>	<u>Product Type/Use</u>	<u>(Dates Approximately)</u>		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Red Top Structo-Lite Gypsum Plaster for Machine Application (cont.)				Southard, OK
				Sweetwater, TX
		1955	1959	Milwaukee, WI
		1957	1962	Shoals, IN
		1958	1962	Plaster City, CA
		1963	1972	Fort Dodge, IA
		1971	1972	Detroit, MI
Oriental Exterior Finish Stucco	Exterior Finish Stucco	1930	1973	Fort Dodge, IA
		1930	1944	Gypsum, OH
		1930	1972	New Brighton, NY
		1930	1972	Oakfield, NY
				Sweetwater, TX
		1932	1944	Boston, MA
				Philadelphia, PA
		1932	1946	Milwaukee, WI
		1949	1972	Jacksonville, FL
				Philadelphia, PA
		1949	1972	Norfolk, VA
Pyrobar Mortar Mix	Aggregated plaster	1969	1970	East Chicago, IN
		1969	1972	New Brighton, NY
Sheetrock Radiant Heat Filler - Machine Application	Specialty plaster	1971	1972	Empire, NY
Bondcrete	Basecoat	1940	1943	Midland, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
SPRAYDON STANDARD A ^o	Fireproofing	1966	1971	S. Plainfield, NJ Torrance, CA
SPRAYDON STANDARD C ^o	Fireproofing	1968	1970	S. Plainfield, NJ Torrance, CA
SPRAYDON POWERCOTE ^o	Thermal Insulation	1969	1971	Corsicana, TX

^o SprayDon - U. S. Gypsum manufactured this product pursuant to the specification of Sprayon Research Corporation.

FIRECODE V	Fireproofing Plaster	1964	1968	East Chicago, IN New Brighton, NY Empire, NV
FIRECODE D	Fireproofing Plaster	1959	1964	New Brighton, NY East Chicago, IN Empire, NV
****ACOUSTONE 120	Ceiling Tile	1967	1975	Gypsum, OH Walworth, WI
ACOUSTONE 180	Ceiling Tile	1966	1976	Walworth, WI Gypsum, OH
USG	Texture	1964	1976	Gypsum, OH Sweetwater, TX Dallas, TX Chamblee, GA Midway, IL South Gate, CA
Texolite	Texture	1961	1967	Gypsum, OH Dallas, TX New Brighton, NY South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Pac-Tex	Texture	1943	1963	South Gate, CA Dallas, TX Sweetwater, TX
Imperial QT	Texture	1964	1976	South Gate, CA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY Chamblee, GA
"SHEETROCK" Texture	Texture	1964	1976	Gypsum, OH Dallas, TX Midway, IL South Gate, CA
Textone	Texture	1944	1975	Gypsum, OH Sweetwater, TX South Gate, CA Dallas, TX New Brighton, NY
USG Textone	Texture Paint	1928	1974	South Gate, CA Gypsum, OH Chamblee, GA New Brighton, NY Sweetwater, TX
USG	Texture Paint	1954 1967	1964 1976	Chamblee, GA Sweetwater, TX Gypsum, OH
A-8 TEX	Texture Paint	1935 1959 only 1973 only	1949	Gypsum, OH New Brighton, NY Sweetwater, TX Midway, IL Chamblee, GA South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
<u>Other Products</u> (By generic group)				
Paste Spackling Putty		1952	1975	New Brighton, NY Gypsum, OH Chamblee, GA Sweetwater, TX
Pipcoverings		1936	1938	Jersey City, NJ
Joint Compounds		1920's?	1976	Gypsum, OH Midway, IL Chamblee, GA Dallas, TX East Chicago, IN Jacksonville, FL
Rigid Block Insulation		1943 1970	1950 1971	East Chicago, IN Greenville, MS
Siding Shingles		1937	1975	East Chicago, IN
Roofing		1937 1967 Possible other dates.	1946 1975	Jersey City, NJ St. Paul, MN South Gate, CA
Thermalux	Electric Heating	1961	1965	Shoals, IN (Assembled)
Asbestos Cement	Insulation purposes where sheet and block insulation would be impractical.	1936	1939	Jersey City, NJ

NOTE: Not all products were made at all plants at all times listed.

* May have been produced until this date, but sales diminished substantially by the mid-1950's.

*** Some of these products (Red Top Trowel Finish; Oriental Interior Finish Plaster; Red Top Cover Coat Finish Plaster; Red Top Patching Plaster; Red Top Wood Fiber Plaster Regular Basecoat; Red Top Wood Fiber Plaster Machine Application Basecoat; Cement Plaster - Regular, Name changed to Gypsum Plaster 7/67, to Red Top Gypsum Plaster Basecoat 11/68; Red Top Cement Plaster for Machine Application - Name changed to Red Top Gypsum Basecoat for Machine Application; Red Top Structo-Lite Gypsum Plaster for Machine Application Basecoat; Oriental Exterior Finish Stucco; Pyrobar Mortar Mix; Sheetrock Radiant Heat Filler - Machine Application) did not have asbestos as part of their formulation at all manufacturing locations at all times.

**** Some of these products did not have asbestos as part of their formulation.

Most of the products identified in this Exhibit have a shelf life of approximately six months, with some variation due to humidity and storage conditions. It is the policy of the defendant to provide this information to all customers. Therefore, date of last production approximates date of last sale, though U. S. Gypsum is not certain whether shelf life guidelines were adhered to by its customers. Reasonable investigation continuing.

United States Gypsum Company was established in 1901, and therefore it would be unreasonably burdensome for this defendant to any and all past and present divisions, subsidiaries, affiliated companies or stock transaction purchases of this defendant. This defendant lists below affiliated companies of United States Gypsum Company:

LISTING OF AFFILIATED COMPANIES
OF UNITED STATES GYPSUM COMPANY *

<u>NAME OF COMPANY</u>	<u>ORGANIZED UNDER LAWS OF</u>
101 South Wacker Co.	Delaware
A. Lynn Thomas Company, Incorporated	Virginia
A. P. Green Refractories Co.	Delaware
A. P. Green Refractories Limited	United Kingdom
Bigelow-Liptak Corporation	Michigan
Bigelow-Liptak Export Corporation (name saver)	Texas
Bigelow-Liptak of Canada, Limited	Canada
Brisco Mining, Ltd.	Canada
Canadian Gypsum Company, Limited	Canada
CIKSA, S.A. de C.V.	Mexico
C.N.G. Distribution Limited	Canada
Compania Mexicana de Este, S. A.	Mexico
Construcciones, Recubrimientos Y Acabados	Mexico
C-S-W Drywall Supply Company	Delaware
Darswan, Inc.	Delaware
Fundy Gypsum Company, Limited	Canada
Gypsum Communications Company	Illinois
Gypsum Energy Management Company	Delaware
Gypsum Transportation Limited	United Kingdom
L & W Supply Corporation	Delaware
Liptak Bradley Limited	United Kingdom
Little Narrows Gypsum Company Limited	Canada
Marbrite Manufacturing Corp.	New York
Marstrat, Inc.	Delaware
Masonite Corporation	Delaware
Metropolitan Refractories Corporation (name saver)	New York
North Baldwin Park Corporation	Oklahoma
Panama Gypsum Company, Inc.	Panama

<u>NAME OF COMPANY</u>	<u>ORGANIZED UNDER LAWS OF</u>
Panama Wallboard, Inc.	Panama
Sequoyah Carpet Corporation	Oklahoma
Stocking Specialists, Inc.	Delaware
United States Gypsum Company	Delaware
United States Gypsum Export Company	Delaware
United States Gypsum Urban Development Corporation	Delaware
USG Acoustical Products Company	Delaware
USG Corp.	Delaware
USG de Pureto Rico, Inc.	Delaware
USG Foreign Investments, Ltd.	Delaware
USG Industries, Inc.	Delaware
USG International, Ltd. (DISC)	Delaware
USG Properties, Inc.	Delaware
Westbank Planting Company	Louisiana
Windsor Shipping Limited	Bermuda
Wiss, Janney Elstner Associates, Inc.	Illinois
Yeso Panamericano, S.A. de C.V.	Mexico

*UNITED STATES GYPSUM COMPANY has no subsidiaries or incorporated divisions.

Asbestos-Containing Products -
Reasons for Discontinuation:

- I. Sabinite was replaced by Audicote and Hi-Lite in the marketplace. Audicote and Hi Lite were discontinued because the low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- II. Cost of Compliance with proposed lower OSHA standards within the plant.
- III. At the direction of Sprayon Research Corporation.
- IV. The low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- V. Low Profitability.

<u>Product Categories</u>	<u>Reason for Discontinuation</u>	<u>Last Date of Manufacture</u>
* Acoustical Plasters	I	1974
Plasters	II	1972
Fireproofing Plasters	V	1970
** Fireproofing	III	1972
** Thermal Insulation	III	1971
Ceiling Tile	II	1976
Textures	II	1976
Roofing	II	1976
Joint Compounds	II	1977
Pipe Covering	V	1938
Asbestos Cement	V	1933
Rigid Block Insulation	V	1950
Block Insulation	IV	1971
Cement Siding	II & IV	1975
Paste Spackling Putty	II	1975

* Includes production by subsidiary.

** U. S. Gypsum Company manufactured this product per 1975 to the specifications of Sprayon Research Corporation.

PERCENTAGE OF ASBESTOS (VOLUME)

<u>Product</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
<u>Acoustical Plasters</u>		
SABINITE "TF"	No Change	4.9%
SABINITE "B"	04/18/33	2.0%
	11/03/33	4.0%
SABINITE 38 (HYDRAULIC)	11/10/30	2.4%
	04/18/32	3.0%
	01/13/37	2.0%
	07/12/39	3.0%
SABINITE ACOUSTICAL PLASTER	05/23/30	.93%
	01/01/31	2.5%
	06/29/32	2.0%
	05/03/40	4.0%
SABINITE "X" and SABINITE SPECIAL WHITE	10/18/40	4.0%
	01/23/48	6.3%
SABINITE "F"	02/27/44	4.0%
	07/28/50	3.0%
	07/28/50	4.0%
	09/18/52	3.0%
SABINITE "A" or SABINITE HYDROCAL	04/04/31	4.0%
	04/18/33	2.0%
	11/03/33	4.0%
HI-LITE ACOUSTICAL PLASTER	06/09/53	6.2%
	03/31/55	6.3%
AUDICOTE SPECIAL WHITE	09/15/55	8.25%
	03/24/56	7.62%
	10/01/56	7.60%
	12/14/56	6.0%
	03/17/57	7.7%
	12/02/57	6.95%
	12/02/57	22.50%

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
AUDICOTE SPECIAL WHITE (cont'd.)	03/10/58	7.1%
	03/27/58	6.95%
	04/04/58	22.50%
	05/16/58	16.89%
	05/29/58	17.09%
	05/29/58	16.89%
	05/29/59	16.88%
	05/29/59	16.93%
	12/06/60	8.33%
	07/14/61	8.46%
	07/06/62	7.63%
	08/07/62	7.65%
	02/05/64	7.64%
	08/11/64	7.63%
AUDICOTE SATIN WHITE	09/15/55	8.43%
	08/24/56	7.78%
	10/31/56	7.76%
	03/27/57	7.47%
	12/02/57	26.24%
	03/10/58	8.06%
	03/27/58	7.47%
	04/04/58	26.24%
	05/16/58	19.66%
	05/29/58	19.49%
	05/29/58	19.66%
	05/29/59	19.22%
	05/29/59	19.70%
	12/06/60	8.60%
	07/14/61	8.73%
	07/06/62	7.85%
	08/07/62	7.97%
	02/05/64	7.35%
	12/22/64	7.35%
RED TOP ACOUSTICAL PLASTER*	04/25/51	9.7%
* SPRAYDON STANDARD A	No Change	29.7%
* SPRAYDON STANDARD G	No Change	7.6%
* SPRAYDON POWERCOTE	No Change	30.0%

- * SprayDon - U.S. Gypsum manufactured this product pursuant to the specifications of Spray-On Research Corporation.

Texture Products

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
PAC-TEX	1943	4.5
	1953	4.5-6.0
	1954	3.5
A-B TEX	1935	4.0
	1943	4.5
	1944	4.0
USG TEXTONE Texture Paint	1928	3.3-4.5
	1930	2.8-4.5
	1934	3.3-4.5
	1938	2.67-5.0
	1943	2.67-6.0
	1947	2.67-8.0
	1952	2.5-3.5
	1955	1.2-3.5
	1956	2.3-3.5
	1958	1.2-6.0
	1960	1.2-10.0
	1970	.5-10.0
	1971	.5-3.5
Special Texture Paint	No Change	3.0-4.0
Spray Texture Paint	No Change	1.5-2.5
Improved Spray Texture	No Change	1.5-2.5
Multi-Purpose Texture	No Change	6.0-10.0
Sanded Colored Texture Paint	No Change	2.0-4.0
USG Multi-Purpose Texture Paint	1954	1.0-1.4
	1964	6.0-10.0
USG Texture Paint	No Change	2.5
Spray Texture Paint	1966	Unknown
	1963	5.0
	1969	2.0
USG Multi-Purpose Special White	No Change	5.0

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
USG Multi-Purpose	No Change	6.0-10.0
USG Multi-Purpose	No Change	4.0
Special Texture Paint	1956	Unknown
USG Multi-Purpose Spray Texture	No Change	4.0
USG Multi-Purpose Spray Texture	1972 1973	Unknown 4.0
Spray Texture	No Change	1.5-2.5
AB TEX Texture Paint	No Change	.5
AB TEX Texture Paint	No Change	1.2-1.6
USG Texture	No Change	1.6-3.5
Multi-Purpose	1971	Unknown
Spray Texture Paint White	1969 1973	7.3 0
Spray Texture Paint	1958 1971	1.5-3.0 4.5-6.0
Spray Texture Paint	No Change	1.5-3.0
Simulated Acoustical Spray	No Change	8.0
Simulated Acoustical Spray	No Change	9.0
Spray Texture	No Change	1.5-3.0
Spray Texture	No Change	1.5-4.0
Simulated Acoustical Spray	No Change	8.0
Simulated Acoustical Spray	1961 1962	Unknown 8.0

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
Aggregated Spray Texture	No Change	1.0
Aggregated Spray Texture	1962	1.0
	1963	.5-1.5
Simulated Acoustical Spray	No Change	2.0
"QT" Simulated Acoustical Spray	1964	2.0
	1969	5.0
	1971	4.4
Imperial QT Spray	No Change	1.5
Aggregated Spray	No Change	2.8
Imperial QT Regular Vermiculite	No Change	2.0
Spray Texture	No Change	5.0
Smooth Hard Finish	No Change	1.0
Imperial QT Texture	No Change	2.0
USG Super Hard Spray	No Change	1.2
USG Spray Texture	No Change	5.0
Spray Texture Finish	No Change	.1
USG Texture XII	No Change	3.0
USG Spray Texture	No Change	5.0
USG Texture XII Super Vinyl	1971	3.0
	1972	Unknown
USG Spray Texture Finish	1971	4.0
	1974	5.0
SHEETROCK Smoothcoat	No Change	1.0
USG Exterior Texture Wallboard Finish	No Change	4.0

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
Extra Hard Fine Imperial QT	No Change	1.0-3.0
Simulated Acoustical Spray Texture	No Change	8.0
Simulated Acoustical Spray Texture	No Change	8.0
Imperial QT Texture	No Change	4.0
Simulated Acoustical Spray	No Change	6.0
Simulated Acoustical Spray	No Change	6.5
Simulated Acoustical Spray	No Change	10.0
Simulated Acoustical Spray	No Change	8.0
Simulated Acoustical Spray	No Change	2.5-4.5
Simulated Acoustical Spray	No Change	2.5-3.5
Simulated Acoustical Spray	No Change	2.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	8.0
IMPERIAL QT	No Change	5.0
IMPERIAL QT	No Change	4.0
Multi-Purpose Texture	No Change	2.5
Ready-Mixed Simulated Acoustical Spray	1966	Unknown
IMPERIAL QT	1966	4.0
IMPERIAL QT	1966	1.94-2

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
IMPERIAL QT	1966	2.0-3.0
IMPERIAL QT	1966	3.0
IMPERIAL QT Polystyrene	1966	6.0
SHEETROCK Radiant Heat Simulated Acoustical Spray	1966	6.0
SHEETROCK Simulated Acoustical Spray	1966	2.0
SHEETROCK Simulated Acoustical Spray	1966	3.5
Aggregated Spray Texture	1966	5.0
IMPERIAL QT Regular	1967	Unknown
IMPERIAL QT Regular NC-4	1967 1968	8.0 6.0
IMPERIAL QT	No Change	2.0
USG Spray Texture Finish	1965	.5
USG Spray Texture Finish	1965	.5
XH White	1968	.5-1.5
Aggregated Spray Texture	No Change	2.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	4.0
IMPERIAL QT Coarse Vermiculite	No Change	2.0
IMPERIAL QT Coarse Vermiculite	1970 1971	5.1 5.1

<u>PRODUCT</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
USG Spray Texture R	No Change	1.5
USG Concrete Ceiling Texture	No Change	6.0
TEXTONE Texture Finish	1944	2.5-4.5
	1967	3.5-5.5
	1972	2.5-4.5

Miscellaneous Specialty Plasters - Generally less than 1%

Fireproofing Plasters

Firecode V	Approximately 12%
Firecode V Type D	Approximately 12%

Ceiling Tile

Acoustone 120"	Approximately 3%
Acoustone 180	Approximately 3%

Texture Products - Approximately 3 - 5%. Investigation continues as to individual texture products.

Paste Spackling Putty - Approximately 3%

Pipecoverings - Approximately 30 - 91%

Joint Compounds - Approximately 3 - 5%

Rigid Block Insulation - Approximately 10 - 21%

Mortar - Less than 1%

Siding Shingles - Approximately 12 - 15%

Roofing Shingles - Approximately 0.6 - 1%

Variation in asbestos content is usually reflective of formula changes relative to working properties.

* Not all formulations contained asbestos.

Exhibit H

U. S. Gypsum does not maintain examples of actual packaging in the normal course of business. All packaging contained the product name, this defendant's name, directions and instructions for use. To this defendant's best knowledge, information and belief, the product packaging for its asbestos-containing products was as follows:

Acoustical Plaster	Kraft Paper Bags
Miscellaneous Plasters	Kraft Paper Bags
Stucco	Kraft Paper Bags
Fireproofing Plaster	Kraft Paper Bags
Joint Compound	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Spray Textures	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Block Insulation	Cardboard cartons
Pipecovering	Cardboard cartons, wood crates
Spackling Paste	Metal and plastic cans, buckets and pails
Ceiling Tile	Cardboard cartons
Asbestos Cement	Burlap bags, cardboard cartons

Available packaging bulletins dealing with products which plaintiff can establish were relevant to this lawsuit, will be made available to the plaintiff for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606.

ASBESTOS CONTAINING PRODUCTS

Acoustical Plasters - grayish-white;

Miscellaneous Specialty Plasters - white to off-white
plus some pastels for two products;

Fireproofing - grayish-white;

Fireproofing Plasters - white to off-white;

Ceiling Tile - white to off-white

Texture Products - white to off-white;

Paste Spackling Putty, Pipecoverings, Joint Compounds,
Rigid Block Insulation, Mortar - white to off-white;

Siding - white, gray, ivory, green, brown;

Roofing - red, green, blue, brown, black and gray

Medical Personnel
Retained/Consulted

Oakfield, New York

R. C. Warn, M.D.

J. Diasio, M.D.

Chamblee, Georgia

H. M. Schreeder, M.D.

W. C. McGraw, M.D.

Greenville, Mississippi

J. B. Hirsch, Sr., M.D.

O. Beck, M.D.

J. B. Hirsch, Jr., M.D.

Corsicana, Texas

A. L. Grizzafi, M.D.

Dallas, Texas

Launey Medical & Surgical Clinic

D. G. Launey, M.D.

S. L. Gilbert, M.D.

F. C. Atkinson, M.D.

R. F. Duchouquette, M.D.

W. D. Stevenson, M.D.

D. H. Waddell, M.D.

R. R. Henry, M.D.

Z. L. Dameron, M.D.

W. D. Lee, M.D.

Jacksonville, Florida

J. H. Mitchell, M.D.

J. L. Mitchell, M. D.

Plasterco, Virginia

J. A. Sawyers, M.D.

P. W. Cowherd, M.D.

Sweetwater, Texas

C. A. Rosebrough, M.D.

A. H. Fortner, M.D.

S. A. Loeb, M.D.

J. K. Richardson, M.D.

T. D. Young, M.D.

F. Hood, M.D.

R. L. Price, M.D.

Detroit, Michigan

R. L. St. Louis, M.D.

K. Hergt, M.D.

East Chicago, Indiana

R. J. Liehr, M.D.

F. F. Boys, M.D.

F. A. Benchik, M.D.

G. A. Thegze, M.D.

J. Demkowicz, R.N.

Fort Dodge, Iowa

Fort Dodge Medical Center

T. J. Michelfelder, M.D.

C. L. Dagle, M.D.

M. E. Kraushaar, M.D.

Fort Dodge, Iowa cont.

J. J. Landhuis, M.D.
G. L. LeValley, M.D.
J. W. Rathke, M.D.
R. H. Brandt, M.D.
J. R. Kersten, M.D.
W. C. Robb, M.D.
H. H. Kersten, M.D.
R. E. Woodard, M.D.

Gypsum, Ohio

C. J. Yeisley, M.D.
A. J. Miessner, M.D.
P. Hughes, M.D.
K. Ritter, M.D.
K. Akins, M.D.
M. Jennings, R.N.

Shoals, Indiana

E. B. Lett, M.D.
R. E. Chattin, M.D.

Empire, Nevada

Sparks Medical Clinic

J. M. Watson, M.D.
M. Raymond, M.D.
J. C. Kelly, M.D.
F. C. Stokes, M.D.

Torrance, California

P. Casey, M.D.
J. Anable, M.D.
Dr. Cook

South Gate, California

H. Caesar, M.D.

Family Medical Clinic

(Various physicians. Names unavailable)

Firestone Medical Group

(Various physicians. Names unavailable)

Tacoma, Washington

B. Archer, M.D.

Walworth, Wisconsin

D. R. Hansen, M.D.

I. J. Bruhn, M.D.

J. A. Carroll, M.D.

A. C. Sapida, M.D.

Boston, Massachusetts

V. Rubin, M.D.

E. Staffier, M.D.

A. C. Leavitt, M.D.

Sullivan Square

American Mutual Insurance Clinic

Massachusetts General Hospital

The plants at New Brighton, New York; Jersey City, New Jersey; St. Paul, Minnesota; Midway, Illinois; South Plainfield, New Jersey; and Midland, California are no longer in operation. Identifiable information on medical personnel is not maintained for plants no longer in operation by United States Gypsum Company.