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11 CHEVRON PRODUCTS COMPANY

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

11 RONALD J. CORBAL and KATHLEEN
12 ANN CORBAL,

13 Plaintiffs,

14 vs.

15 CHEVRON CORPORATION, a
16 corporation; CHEVRON RESEARCH AND
17 TECHNOLOGY COMPANY, a
18 corporation; CHEVRON RESEARCH AND
19 TECHNOLOGY COMPANY, a
20 corporation, as Successor-In-Interest to
21 CHEVRON RESEARCH COMPANY, a
22 corporation; BREDERO PRICE
23 COMPANY, a corporation; DRESSER
24 INDUSTRIES, INC., a corporation; T & N,
25 plc, a corporation; T & N, plc, a
26 corporation, as Successor-In-Interest to
27 TURNER & NEWALL, a corporation;
28 T&N, plc, a corporation, as Successor-In-
Interest to KEASBEY & MATTISON
COMPANY, a corporation; TURNER &
NEWALL, PLC, a corporation; RAPID
AMERICAN CORPORATION, a
corporation; RAPID AMERICAN
CORPORATION, a corporation, as
Successor-In-Interest to PANACON
CORPORATION, a corporation; RAPID
AMERICAN CORPORATION, a
corporation, as Successor-In-Interest to
PHILIP CAREY CORPORATION, a
corporation; RAPID AMERICAN

CASE NO. BC 192895

COMPLEX ASBESTOS LITIGATION SUBJECT
TO GENERAL ORDERS CONTAINED IN FILE
No. C 700 000

*Assigned to
Hon. David Horowitz
Department 30*

**CHEVRON U.S.A. INC. d/b/a
CHEVRON PRODUCTS
COMPANY'S RESPONSES TO
PLAINTIFFS' STANDARD
INTERROGATORIES**

(A. products p5)

1 CORPORATION, a corporation, as)
Successor-In-Interest to CAREY)
2 CANADA, INC., a corporation;)
ASBESTOS CORPORATION LIMITED, a)
3 corporation; CSR, LTD., formally)
COLONIAL SUGAR REFINING)
4 COMPANY, INC. OF SYDNEY)
AUSTRALIA; UNION CARBIDE)
5 CORPORATION (f/k/a UNION CARBIDE)
CHEMICALS & PLASTICS COMPANY,)
6 INC.); GAF CORPORATION, a)
corporation; GAF CORPORATION, a)
7 corporation, as Successor-In-Interest to)
RUBEROID COMPANY, a corporation;)
8 GAF BUILDING MATERIALS)
CORPORATION, a corporation; GAF)
9 BUILDING MATERIALS)
CORPORATION, a corporation, as)
10 Successor-In-Interest to GAF)
CORPORATION, a corporation; THORPE)
11 INSULATION COMPANY, a corporation;)
and DOES 1 through 50,)
12)
13 Defendants.)

14
15 PROPOUNDING PARTY: Plaintiffs RONALD J. CORBAL and KATHLEEN ANN
16 CORBAL
17 RESPONDING PARTY: Defendant CHEVRON U.S.A. INC. d/b/a/ CHEVRON
18 PRODUCTS COMPANY
19 SET NO.: ONE
20

21 DEFENDANT CHEVRON U.S.A. INC. d/b/a/ CHEVRON PRODUCTS COMPANY
22 erroneously sued herein as "Chevron Corporation, Chevron Research and Technology Company
23 and Chevron Research and Technology Company as Successor-in-Interest to "Chevron Research
24 Company" hereby responds to Plaintiffs' Standard Interrogatories, served on August 26,
25 1998, as follows:
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PRELIMINARY STATEMENT

CHEVRON U.S.A. INC. d/b/a/ CHEVRON PRODUCTS COMPANY ("Chevron")
objects to service of the standard interrogatories to product manufacturers in this case in that
plaintiffs have not alleged any injuries or damage from a product which Chevron manufactured.

Without waiving the foregoing general objection and subject thereto, Chevron has
endeavored, in good faith, to respond to plaintiffs' interrogatories and states that it has not
completed its investigation of all of the facts relating to this case, has not fully completed its
discovery in this action, and has not completed its preparation for trial. As such, the responses
herein are based only upon such information and documents, which are presently available to
and specifically known to Chevron, and said responses disclose only those contentions which
presently occurred to Chevron. It is anticipated that further discovery, independent investigation,
legal research and analysis will supply additional facts, and meaning to known facts, and
establish entirely new factual conclusions and legal contentions.

The following responses are given without prejudice to Chevron's rights to produce
evidence of any subsequently discovered fact or facts, which Chevron may later recall, or of
which it may later become aware. Accordingly, Chevron reserves the right to change any and all
answers herein as additional facts are ascertained, analyses are made, legal research is completed
and contentions are formulated.

The responses contained herein are made in a good faith effort to supply as much factual
information, and as much specification, as is presently known, but should in no way be to the
prejudice of Chevron in relation to further discovery, research, analysis, or proof.

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25
INTERROGATORY NO. 1.:

Please state the full name, present business address, present residence, and capacity or
title of the individual answering or signing these Interrogatories on behalf of the answering
defendant.

1 **RESPONSE TO INTERROGATORY NO. 1.:**

2 The individual verifying these responses on behalf of Chevron is: Frank G. Soler;
3 Assistant Secretary; Chevron U.S.A. Inc., 575 Market Street, San Francisco, California 94105.

4 **INTERROGATORY NO. 2.:**

5 Have you, at any time, engaged in the processing, marketing, and sale of products
6 containing asbestos fibers?

7 **RESPONSE TO INTERROGATORY NO. 2.:**

8 Yes. Some of the asbestos-containing coating products manufactured by Chevron
9 contained a minimal amount of chrysotile asbestos fiber to increase the durability of the product
10 when exposed to the elements. The fibers were used as a bonding and temperature resistant
11 agent to ensure the structural integrity of the components in which they were used. In each and
12 every case where asbestos fiber was used in a Chevron product, the fibers were completely
13 encapsulated and trapped in a benign matrix when it entered the stream of commerce. No
14 Chevron product incorporated asbestos as a primary ingredient in the composition of the
15 product. Chevron's asbestos-containing coating products were sold in pre-mixed, liquid form.
16 As such, it was physically impossible for asbestos fibers to escape from the matrix during the
17 installation of the product.

18 **INTERROGATORY NO. 3.:**

19 If your answer to Interrogatory No. 2 is in the affirmative, please state:

20 (a) The trade or brand name of each such product, mined, manufactured, and/or
21 marketed;

22 (b) The dates that each of such products were placed on the market;

23 (c) The dates that each of such products were withdrawn from the market;

24 (d) A description of the physical (i.e., chemical) composition of each such product,
25 including the type of asbestos contained in each such product (i.e., amosite, chrysotile or
26 crocidolite), the quantitative percentage of asbestos in each product;

27 A description of the physical appearance of each such product;

28 (e) A description of the physical appearance of each such product;

- 1 (f) A detailed description of the intended use of each such product;
2 (g) The name of the manufacturer of each such product;
3 (h) The mining or milling concern from which the raw asbestos fiber was obtained.
4

5 **RESPONSE TO INTERROGATORY NO. 3.:**

6 Chevron objects to this interrogatory on the grounds that it is overbroad, and seeks
7 information which is not reasonably calculated to lead to the discovery of admissible evidence in
8 this case. Chevron further objects to this interrogatory on the grounds that it unduly burdensome
9 and oppressive particularly when the amount of work required to answer the question fully is
10 balanced against the utility, if any, of the information sought. Chevron further objects to certain
11 subparts of this interrogatory to the extent that they seek disclosure of confidential and/or
12 proprietary information and/or trade secrets concerning the chemical formulation of its products.

13 Subject to and without waiver of these objections, Chevron responds as follows:
14 Chevron marketed a line of coating products called (1) Chevron Asbestos Roof Coating, (2)
15 Chevron Aluminum Asbestos Coating, and (3) Weather Coat (formerly known as Laykold
16 Weather Coat). Chevron Asbestos Roof Coating was last sold in approximately 1984. Chevron
17 Aluminum Asbestos Coating was last sold in approximately 1985. Weather Coat was last sold
18 in approximately 1982. Those three coating products contained a small amount of asbestos as
19 set forth in response to Interrogatory No. 2. The asbestos was provided by outside vendors.
20 Chevron is presently unable to determine the dates when those three products were first placed
21 on the market.

22 In addition, Chevron marketed or sold the following asbestos-containing products during
23 the timeframes set forth below: Standard Plastic Cement Heavy (from approximately 1947 to
24 approximately 1952); Chevron Blind Nail Cement (from approximately 1968 to approximately
25 1982); Chevron Colorcast Base (from approximately 1978 to approximately 1982); Chevron
26 Color Coat 200 (from approximately 1962 to approximately 1982); Dry Turf Premix (from
27 approximately 1969 to approximately 1973); Chevron Coating Dry Turf (from approximately
28 1969 to approximately 1973); Chevron Fibrated Clay Emulsion (from approximately 1951 to
approximately 1982); Chevron Fibercoat (from approximately 1948 to approximately 1982);

1 Chevron Grasstex Surfacing Compound (from approximately 1948 to approximately 1982);
2 Chevron Grasstex Surfacing Compound (Rubberized - from approximately 1965 to
3 approximately 1982); Laykold Heavy Duty Color (from approximately 1962 to approximately
4 1966); Chevron Heavy Duty Resurfacer (from approximately 1961 to approximately 1973);
5 Chevron Plastic Cement (from approximately 1961 to approximately 1982); Step Grip (from
6 approximately 1952 to approximately 1960); Chevron Tennis Top-3000 (from approximately
7 1976 to approximately 1982); Chevron Tile Set (cutback) (from approximately 1956 to
8 approximately 1976); Chevron Walk Top Surfacing Compound Black (from approximately 1961
9 to approximately 1982); Chevron Walk Top Surfacing Compound Red (from approximately
10 1961 to approximately 1982); Chevron Walk Top Surfacing Compound Green (from
11 approximately 1961 to approximately 1982); and Chevron Wet Patch (from approximately 1961
12 to approximately 1982).

13 As stated in response to Interrogatory No. 2, neither Chevron Asbestos Roof Coating,
14 nor Chevron Aluminum Asbestos Coating or Weather Coat contained unbound, individual or
15 friable asbestos fibers. The fibers were used as a bonding and temperature resistant agent to
16 ensure the structural integrity of the surrounding components. Indeed, in each and every case
17 where asbestos fiber was used in a Chevron product, the fibers were completely encapsulated
18 and trapped in benign matrix when it entered the stream of commerce. All of the foregoing
19 coating products was sold in a pre-mix, liquid form. As such, it was physically impossible for
20 asbestos fibers to escape from the matrix during the installation of the product. No Chevron
21 product incorporated asbestos as a primary ingredient in the composition of the product.

22 To the extent that this interrogatory seeks non-proprietary information, Chevron provides
23 the following additional information:

24 Asbestos Roof Coating was manufactured under two formulas, which contained 8% and
25 9% asbestos fibers by mass, respectively. Asbestos fiber content ranged in the various
26 formulations from 7% to 11%. The various formulations have included the following types and
27 grades of chrysotile asbestos fiber:

- 28 (1) 1930-1948: Philip Carey 3x (7%-9%);

- (2) 1948-1948: Philip Carey 3x (7%-10.2%);
- (3) 1950-1954: Johns-Manville ("JM") 6D (9%);
- (4) 1955-1956: JM 7M06 (9%);
- (5) 1957-1975: JM 7R05 (11%);
- (6) 1976-1978: JM 7R05 (8%);
- (7) 1979-1980: Calidiria HPO (Union Carbide) (11%) and Calaveras 7R (9%); and
- (8) 1981-approximately 1982: JM 7R05 (8%) and Calaveras 7R (9%).

Chevron Aluminum Asbestos Coating was manufactured under two formulas, each of which contained 9% asbestos fiber by mass. The asbestos fiber content ranged in the various formulations from 6% to 10.6%. The various formulations have included the following types and grades of asbestos fiber:

- (1) 1947-1949: Philip Carey 3x (6%-7.2%);
- (2) 1951-1953: JM 6D-20 (7.5%);
- (3) 1954-1956: JM 7M06 (7.5%);
- (4) 1957-1975: JM 7R05 (10.6%);
- (5) 1976-1978: JM 7R05 (9%);
- (6) 1979-1980: Calidiria HPO (9%); and
- (7) 1981-approximately 1982: JM 7R05 (9%).

Weather Coat was manufactured under a formula that contained 15% asbestos fiber by mass. Historically, Johns-Manville asbestos fiber (specifically JM 7M05) was used in the formulation. Calidiria HPO and Calaveras 7R were also approved for use.

Asbestos Roof Coating was a heavy black liquid that weighed 8.4 lbs. per gallon. Aluminum Asbestos Coating was a heavy gray liquid with a gel consistency that weighed 9.5 lbs. per gallon. Weather Coat was a black or dark brown viscous material of easy troweling consistency. All of the products were intended for use as coatings to a maximum temperature limit of approximately 200°F. Chevron's investigation and discovery are continuing.

1 **INTERROGATORY NO. 4.:**

2 Have any of the products listed in Interrogatory No. 3 been altered in chemical
3 composition or asbestos type or content since first being marketed?

4 **RESPONSE TO INTERROGATORY NO. 4.:**

5 Chevron objects to this interrogatory on the grounds that it is vague, ambiguous and
6 overbroad and is not reasonably calculated to lead to the discovery of admissible evidence in this
7 case. Chevron further objects to this interrogatory on the ground that it is burdensome and
8 oppressive particularly when the amount of work required to answer the question is balanced
9 against the utility, if any, of the information sought. Subject to and without waiver of these
10 objections, Chevron responds as follows: Yes, see response to Interrogatory No. 3. Given the
11 length of time that has passed since Chevron last manufactured or marketed any products which
12 contained asbestos, Chevron is presently unable to provide a further response to this
13 interrogatory.

14 **INTERROGATORY NO. 5.:**

15 If so, please state:

- 16 (a) The trade name of each such product;
17 (b) The date each such product was altered;
18 (c) The nature of the alteration;
19 (d) The reason for the alteration.

20 **RESPONSE TO INTERROGATORY NO. 5.:**

21 Chevron objects to this interrogatory on the grounds that it is overbroad and is not
22 reasonably calculated to lead to the discovery of admissible evidence in this case. Chevron
23 further objects to this interrogatory on the ground that it is burdensome and oppressive
24 particularly when the amount of work required to answer the question is balanced against the
25 utility, if any, of the information sought. Subject to and without waiver of these objections,
26 Chevron responds as follows: See response to Interrogatory No. 3. Given the length of time that
27 has passed since Chevron last manufactured or marketed any products which contained asbestos,
28 Chevron is unable to provide a further response to this interrogatory at this time.

1 **INTERROGATORY NO. 6.:**

2 Do you have any records which reflect sales of each of the products identified by you in
3 Interrogatory No. 3 above for each year said products were sold?

4 **RESPONSE TO INTERROGATORY NO. 6.:**

5 Chevron objects to this interrogatory on the grounds that it is overbroad and is not
6 reasonably calculated to lead to the discovery of admissible evidence in this case. Chevron
7 further objects to this interrogatory on the ground that it is burdensome and oppressive
8 particularly when the amount of work required to answer the question fully is balanced against
9 the utility, if any, of the information sought. Subject to and without waiver of these objections,
10 Chevron responds as follows: No.

11 **INTERROGATORY NO. 7.:**

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

13 (a) A description of said records or documents sufficient to permit plaintiff to
14 describe such documents for purposes of a notice to produce or a motion for production of
15 documents;

16 (b) The name, business address and telephone number, employer, and job title of the
17 person or persons having present custody of or control over the original of said documents.

18 **RESPONSE TO INTERROGATORY NO. 7.:**

19 Not applicable.

20 **INTERROGATORY NO. 8.:**

21 For the period 1930 to the present, do you have any written memoranda, specifications,
22 or other written materials of any kind or character relating to the testing of the health effects of
23 products identified in Interrogatory No. 3, above? If so please describe with sufficient
24 particularity to satisfy the requirements of a Request for Production of Documents.

25 **RESPONSE TO INTERROGATORY NO. 8.:**

26 No.
27
28

1 **INTERROGATORY NO. 9.:**

2 Did you make any design changes as a result of such tests referred to in Interrogatory
3 No. 8?

4 **RESPONSE TO INTERROGATORY NO. 9.:**

5 Not applicable.

6 **INTERROGATORY NO. 10.:**

7 If so, please state:

8 (a) The nature of the change made, the name, address and job classification of each
9 person in charge of making a change.

10 **RESPONSE TO INTERROGATORY NO. 10.:**

11 Not applicable.

12 **INTERROGATORY NO. 11.:**

13 Have you, at any time, published and/or distributed any brochures, sales literature,
14 pamphlets or other written materials (aside from any caution labels on containers) of any kind or
15 character that contain any warnings, cautions, caveats, or directions concerning the possibility of
16 injury resulting from the use of the products listed in Interrogatory No. 3, above?

17 **RESPONSE TO INTERROGATORY NO. 11.:**

18 Yes.

19 **INTERROGATORY NO. 12.:**

20 From 1930 to the present, did the asbestos products manufactured or distributed by you,
21 contain any warnings, cautions, caveats or other statements on the product or its packaging?

22 **RESPONSE TO INTERROGATORY NO. 12.:**

23 Yes.

24 **INTERROGATORY NO. 13.:**

25 If so, please state:

26 (a) When did the warnings first appear?

27 (b) What was the precise wording of the warning, when it first appeared?
28

1 (c) Was the warning altered, amended or changed in any manner? If so, how and
2 when?

3 (d) Where was the warning located on the product or packaging?

4 (e) When did you become aware of warnings placed on products distributed by other
5 manufacturers or suppliers of asbestos or asbestos-containing products?

6 (f) State the manner in which your product is shipped and the type of container in
7 which it is shipped to retailers;

8 (g) State whether any industrial psychologists or human factors engineers were
9 consulted prior to utilizing such warnings, cautions, etc.

10 **RESPONSE TO INTERROGATORY NO. 13.:**

11 (a) After conducting a diligent search and making a reasonable inquiry, Chevron is
12 unable to determine the precise date when warnings were placed on the asbestos-containing
13 products which it manufactured or distributed.

14 (b) Most of Chevron's asphalt-based products had the following warning, or a
15 similar version of this warning on the label:

16 "DANGER! HARMFUL OR FATAL IF SWALLOWED. COMBUSTIBLE.
17 KEEP OUT OF THE REACH OF CHILDREN.

18 "Contains Petroleum Naptha: Keep away from heat or open flame. Use only in
19 well-ventilated area. Avoid prolonged or repeated breathing of vapor or contact
20 with skin or eyes. If swallowed, DO NOT INDUCE VOMITING. CALL A
21 PHYSICIAN IMMEDIATELY."

22 (c) After conducting a diligent search and making a reasonable inquiry, Chevron is
23 unable to determine whether the warning was altered, amended or changed.

24 (d) The warning set forth in subpart (b) was on the packaging.

25 (e) After conducting a diligent search and making a reasonable inquiry, Chevron is
26 unable to determine the precise date it became aware that other manufacturers or suppliers of
27 asbestos-containing products were placing warnings on their products.
28

1 (f) Most of the asphalt-based products were shipped in either five-gallon plastic
2 pails or in 53-gallon metal drums.

3 (g) At this time it is unknown whether any industrial psychologists or human factors
4 engineers were consulted prior to utilizing such warnings.

5 **INTERROGATORY NO. 14.:**

6 When did you first receive notice that any person claimed injury as a result of exposure
7 to asbestos or asbestos-containing products manufactured and/or sold by you?

8 **RESPONSE TO INTERROGATORY NO. 14.:**

9 Chevron objects to this interrogatory on the grounds that it seeks information which is
10 not reasonably calculated to lead to the discovery of admissible evidence in this case.

11 Subject to and without waiver of these objections, Chevron responds as follows: based
12 on our present knowledge, Chevron first received such notice when a Chevron entity was first
13 served with a Summons and Complaint in a lawsuit, in about December 1993.

14 **INTERROGATORY NO. 15.:**

15 With respect to the claim described in Interrogatory No. 14, please state:

- 16 (a) The name and address of the claimant;
17 (b) The date of notice of the claim;
18 (c) A description of the claim, i.e. Workers' Compensation, products liability, etc.;
19 (d) The type of injuries allegedly sustained;
20 (e) The name and address of the attorney who represented the individual making
21 such claim;
22 (f) The style and court number of the claim if any;
23 (g) The resolution of the claim.

24 **RESPONSE TO INTERROGATORY NO. 15.:**

- 25 (a) Peter and Kathleen Egan, Clifton, NJ.
26 (b) See response to 14 above.
27 (c) Personal injury, asbestos.
28 (d) Pleural.

1 (e) Leisah Bluespruce, New Brunswick, NJ.

2 (f) *Egan, Peter and Kathleen v. Chevron Industries Inc.*; NJ State Court, Middlesex
3 County; Docket # L-11881-93.

4 (g) Pending.

5 **INTERROGATORY NO. 16.:**

6 Do you have any policies of insurance that cover the claims that have been made by
7 plaintiff herein?

8 **RESPONSE TO INTERROGATORY NO. 16.:**

9 Chevron objects to this interrogatory on the grounds that it is overbroad and is unduly
10 burdensome in that it asks Chevron to review every one of its insurance policies to provide
11 responsive information, and there has been no showing that the requested information is
12 necessary or relevant to any potential judgment which may be entered against Chevron in this
13 case. Chevron further objects to this interrogatory on the grounds that it seeks information that
14 may be confidential or protected from disclosure by the attorney client privilege and/or attorney
15 work product doctrine. Subject to and without waiver of these objections, Chevron responds as
16 follows: Chevron does not carry insurance for the claims and injuries of the nature and extent
17 asserted by the plaintiffs.

18 **INTERROGATORY NO. 17.:**

19 If so, please list the names of each insurance carrier with whom you have coverage, the
20 amount of such coverage, and the dates of each such policy.

21 **RESPONSE TO INTERROGATORY NO. 17.:**

22 Not applicable.

23 **INTERROGATORY NO. 18.:**

24 Please describe in detail the type of packages in which you have sold asbestos materials,
25 listing the dates each type of package was used, a physical description thereof, and a description
26 of any printed material or trademark that appeared thereon.
27
28

1 **RESPONSE TO INTERROGATORY NO. 18.:**

2 See above responses to Interrogatory No. 13(b) and 13(f). Additionally, product
3 application information also appeared on the outside of the product packaging.

4 **INTERROGATORY NO. 19.:**

5 For the period 1930 to January 1, 1978, did you receive any reports or communications
6 from your Workers' Compensation insurance carrier or products liability insurance carrier with
7 regard to the hazards incident to use of asbestos-containing products? If so, please state who had
8 possession of said reports, the location of said reports, and the substance of the contents of said
9 reports, listing for each such report the respective insurance company, its address and the agent
10 signing such correspondence.

11 **RESPONSE TO INTERROGATORY NO. 19.:**

12 Not to our current knowledge.

13 **INTERROGATORY NO. 20.:**

14 Have you imported asbestos or asbestos materials since 1930?

15 **RESPONSE TO INTERROGATORY NO. 20.:**

16 No.

17 **INTERROGATORY NO. 21.:**

18 If the answer to the preceding Interrogatory is in the affirmative, please state:

- 19 (a) From where the asbestos or asbestos materials were imported;
20 (b) How long you have imported asbestos or asbestos materials;
21 (c) Whether you have supplied this imported asbestos or asbestos materials to any of
22 the other defendants since 1945, when these transactions took place and where;
23 (d) Whether any warnings, cautions, caveats, or directions accompanied the
24 materials referred to in subpart (c) above, and the date these first appeared.

25 **RESPONSE TO INTERROGATORY NO. 21.:**

26 Not applicable.

1 **INTERROGATORY NO. 22.:**

2 If you have discontinued manufacturing and/or selling any asbestos products, please state
3 the reason or reasons therefor.

4 **RESPONSE TO INTERROGATORY NO. 22.:**

5 Chevron objects to this interrogatory on the grounds that it is overbroad and seeks
6 information which is not reasonably calculated to lead to the discovery of admissible evidence in
7 this case, particularly since plaintiff Ronald Corbal's alleged exposure to asbestos occurred long
8 before the date Chevron discontinued manufacturing and/or selling many of its asbestos-
9 containing products. Notwithstanding the above, Chevron is unable to provide the reasons why
10 it discontinued manufacturing and/or selling each of its asbestos-containing products at this time.

11 **INTERROGATORY NO. 23.:**

12 Have any other manufacturers or suppliers of asbestos or asbestos-containing products
13 ever furnished you with information as to the state of medical knowledge regarding the
14 connection between asbestos exposure and the contracting of cancer or asbestosis?

15 **RESPONSE TO INTERROGATORY NO. 23.:**

16 Chevron objects to this interrogatory to the extent that it calls for information which is
17 protected by the attorney client privilege and/or the attorney work product doctrine. Chevron
18 further objects to this interrogatory on the grounds that it seeks information, which is not
19 reasonably calculated to lead to the discovery of admissible evidence in this action. Chevron is
20 aware of the following non-privileged information: John-Manville Corporation furnished
21 Chevron with information concerning the health effects of occupational exposure to asbestos in
22 1971, three years after plaintiff Ronald Corbal was allegedly exposed to the asbestos.

23 **INTERROGATORY NO. 24.:**

24 If the answer to the preceding Interrogatory is in the affirmative, please state:

- 25 (a) What information was furnished to you;
26 (b) The date the information was furnished to you;
27 (c) The names of all parties who furnished the information to you.
28

1 **RESPONSE TO INTERROGATORY NO. 24.:**

2 See response to Interrogatory No. 23.

3 **INTERROGATORY NO. 25.:**

4 Have any manufacturers or suppliers of asbestos or asbestos-containing products
5 furnished to you or have you furnished any other manufacturers or suppliers of asbestos or
6 asbestos-containing products the results of any research, tests, medical studies or experiments
7 regarding the state of the medical knowledge as to the connection between asbestos exposure
8 and the contracting of cancer or asbestosis, since 1930?

9 **RESPONSE TO INTERROGATORY NO. 25.:**

10 No, not to our current knowledge.

11 **INTERROGATORY NO. 26.:**

12 If the answer to the preceding interrogatory is in the affirmative, please state:

- 13 (a) When each took place;
14 (b) Who participated in each;
15 (c) A summary of the content of each document or communication.

16 **RESPONSE TO INTERROGATORY NO. 26.:**

17 Not applicable.

18 **INTERROGATORY NO. 27.:**

19 Have you ever conducted or sponsored or contributed financially to any studies or
20 research to determine if the inhalation of asbestos fibers may be harmful? If so, please state:

21 By whom the research was conducted, giving complete names and addresses;

- 22 (a) The dates that each such test was conducted;
23 (b) The complete results of each test or study;
24 (c) Whether you will supply copies of reports of the research department
25 pertaining to the use of the corporation of asbestos and their manufactured asbestos-containing
26 products, without the necessity of a formal notice to produce or motion to produce documents,
27 and, if so, please attach said copies to your answers to Interrogatories.
28

1 **RESPONSE TO INTERROGATORY NO. 27.:**

2 No, not to our current knowledge.

3 **INTERROGATORY NO. 28.:**

4 State the names and addresses of your chief medical officers from 1930 until the present
5 time, listing the periods of time each such medical officer was employed by you, and in what
6 capacity.

7 **RESPONSE TO INTERROGATORY NO. 28.:**

8 Neither Chevron nor its predecessor ever employed a chief medical officer. However,
9 Chevron and its predecessor employed several physicians during the stated time period to
10 manage the general medical affairs of the Corporation. The following is a list of those
11 physicians. The business address for each of the physicians is 575 Market Street, San Francisco,
12 CA 94105.

13	1930-1948	H.S. Thompson
14	1948-1965	L.E. Curtis
15	1965-1975	G.W. Richmond
16	1975-1983	J.D. Ryan
17	1983-1995	R.E. Swencicki
18	1995-Present	T.L. Bridge

19 **INTERROGATORY NO. 29.:**

20 Name the person in the corporate structure to whom the chief medical officer reports or
21 reported, also giving that person's position and/or job title in the corporation.

22 **RESPONSE TO INTERROGATORY NO. 29.:**

23 The current Medical Director reports directly to C.P. Russum, the General Manager of
24 the Center for Expertise, a division of the Corporate Human Resources Department. Previous
25 Medical Directors reported to various Corporate Vice Presidents of Human Resources. Chevron
26 is currently unaware of the names of those individuals and their historical dates of employment.

27 **INTERROGATORY NO. 30.:**

28 Please state the duties and responsibilities of the corporation's chief medical officer.

1 **RESPONSE TO INTERROGATORY NO. 30.:**

2 See response to Interrogatory No. 28.

3 **INTERROGATORY NO. 31.:**

4 Please state the names and addresses of all physicians who were employed, retained, or
5 otherwise engaged by you at any of your facilities from the year 1930 until the present time for
6 the purposes of evaluating, diagnosing or treating pulmonary complaints or problems in past,
7 present or prospective employees.

8 **RESPONSE TO INTERROGATORY NO. 31.:**

9 Chevron objects to this interrogatory on the grounds that it is overbroad, and seeks
10 information which is not reasonably calculated to lead the discovery of admissible evidence in
11 this case. Chevron further objects to this interrogatory on the grounds that it is unduly
12 burdensome and oppressive particularly when the amount of work required to answer the
13 question fully is balanced against the utility, if any, of the information sought. Chevron further
14 objects to this interrogatory to the extent that it seeks information which is protected from
15 disclosure by the attorney-client privilege and/or the attorney work product doctrine. Subject to
16 and without waiver of these objections, Chevron responds as follows: Chevron employed
17 numerous physicians in the United States and outside the United States during the stated time
18 period. The following is a list of physicians employed by Chevron or its predecessor during the
19 stated time period who Chevron has identified to date: Timothy L. Bridge; Gerrit Michael;
20 Robert E. Swencicki; Michael Gilberti; N.M. Nisar; Samuel N. Bacon; Ward Richter; Willard
21 Hawkins; Howard W. Kopping; William A. Kornblum; R.J. Shaw; Letcher Barnes; Kenneth
22 Olschansky; Wolfgang Hartz; Gordon Richmond; James Holland; James D. Ryan; H.S.
23 Thompson and L.E. Curtis. The business address for each of the physicians is 575 Market
24 Street, San Francisco, CA 94105. Chevron is currently unaware whether any of these physicians
25 evaluated, diagnosed, or treated pulmonary complaints or problems in employees. Investigation
26 and discovery are continuing.

1 **INTERROGATORY NO. 32.:**

2 Please state the names and addresses of all persons employed by you from 1930 through
3 January 1, 1978 who functioned as industrial hygienists. As contemplated by these
4 interrogatories, an industrial hygienist is one that performs engineering or health studies to
5 identify and evaluate potential occupational health hazards, and suggests methods of dealing
6 with same. With respect to each person employed by you as an industrial hygienist, please state:

- 7 (a) The facility or office to which each was assigned;
8 (b) His or her complete and precise duties and responsibilities.

9 **RESPONSE TO INTERROGATORY NO. 32.:**

10 Chevron objects to this interrogatory on the grounds that it is overbroad and seeks
11 information which is not reasonably calculated to lead to the discovery of admissible evidence in
12 this case. Chevron further objects to this interrogatory on the grounds that it is burdensome and
13 oppressive particularly when the amount of work required to answer the question fully is
14 balanced against the utility, if any, of the information sought. Chevron further objects to this
15 interrogatory to the extent that it seeks information which is protected from disclosure by the
16 attorney-client privilege and/or the attorney work product doctrine. Subject to and without
17 waiver of these objections, Chevron responds as follows: Chevron employed numerous
18 industrial hygienists in the United States and outside the United States during the stated time
19 period. All of the industrial hygienists employed by Chevron were responsible for work place
20 safety. Chevron's industrial hygienists over the years included: A.C. Bagos; J.L. Carbajal; R.T.
21 Cheng; W.S. Cook; C.D. Crossman; H.P. Davis; K.J. Diaz; M.M. Duda; G.L. Hunting; T.S.
22 Kellogg; L.L. Leslie; M.N. Nyeholt; R.J. Reinhart; J.L. Terry; C.L. Wang; C.L. Kyllonen; C.A.
23 Hales; J.E. Sprinson; W.H. Graze; J.J. McDermott; N.C. Zeiser; H.T. Miller; L.A. Rovnanik;
24 W.D. Holland; P.J. Forman; J.J. Sunderland; C.J. Kmetz; J.S. Hatfield; D.C. Gilley; R.K. Grant;
25 M.G. Boone; J.M. Anderson; G.M. Gia; E.J. Fourakis; M.M. Sunderland; S.L. Dryden; B.S.
26 Lyle; R.C. Stover and D.J. Lovell.

1 **INTERROGATORY NO. 33.:**

2 Did you medical officers, physicians or industrial hygienist at any time, ever make any
3 recommendations and/or suggestions to you pertaining to the risks or hazards to persons
4 involved in the manufacturing or use of asbestos or asbestos-containing products? If so, please
5 state:
6

- 7 (a) Where the recommendations were made;
8 (b) To whom they were made;
9 (c) By whom they were made;
10 (d) The substance of each recommendation.

11 **RESPONSE TO INTERROGATORY NO. 33.:**

12 No, not to our current knowledge.

13 **INTERROGATORY NO. 34.:**

14 Please state the names of trade association periodicals to which you subscribed from
15 1928 to January 1, 1978. State whether or not during said period, you had any knowledge of any
16 articles being printed in industry trade journals, essays, memoranda, and other similar sources
17 pertaining to the hazardous potentials of asbestos, and please further state which of such articles
18 were received by you.

19 **RESPONSE TO INTERROGATORY NO. 34.:**

20 Chevron and/or its employees subscribed to numerous business, technical and
21 professional publications during the stated time period. These publications included, but are not
22 limited to: American Petroleum Institute; Abstracts of Petroleum Refining and Petrochemicals;
23 Abstracts of Refining Patents. Chevron is unable to state at the present time whether or nor it
24 received any articles during the relevant time period pertaining to the health effects of asbestos
25 exposure.

26 **INTERROGATORY NO. 35.:**

27 Name those organizations, groups, inter-company or industrial organizations, their
28 committees or subcommittees, to which you belong which conducted studies or researched

1 relationships, if any, between exposure to asbestos fibers or products and asbestosis and lung
2 cancer, from 1945 to 1970 and the years of your membership.

3 **RESPONSE TO INTERROGATORY NO. 35.:**

4 Chevron was a member of the American Petroleum Institute from approximately 1965 to
5 the present; Chevron was a member of the Industrial Hygiene Foundation from 1955 to 1960;
6 Also, Chevron was a member of the American Industrial Hygiene Association and the National
7 Safety Council. Chevron is unable to ascertain the time frame during which it was a member of
8 the American Industrial Hygiene Association or the National Safety Council. Membership in
9 committee and/or subcommittees known at this time include the Medical Advisory Committee,
10 the Health and Biological Committee and the Industrial Hygiene Committee of the American
11 Petroleum Institute. The dates of such membership are not presently known.

12 **INTERROGATORY NO. 36.:**

13 Have you received copies of transcribed minutes of the various committee meetings,
14 subcommittee meetings, general meetings and Board of Director meetings of any organization
15 listed in answer to Interrogatory No. 35 within one year of such meetings?

16 **RESPONSE TO INTERROGATORY NO. 36.:**

17 Following a diligent search and reasonable inquiry, Chevron responds as follows: No,
18 not to our current knowledge. Investigation and discovery are continuing.

19 **INTERROGATORY NO. 37.:**

20 Please state the amounts you have spent or contributed annually, from 1930 until January
21 1, 1978, for research specifically directed to the relationship, if any, between an exposure to
22 asbestos-containing products and asbestosis, lung cancer or any other pulmonary disease.

23 **RESPONSE TO INTERROGATORY NO. 37.:**

24 Chevron has no record of or knowledge of having spent money on any such pursuit.

25 **INTERROGATORY NO. 38.:**

26 Please state the amount you have annually contributed from 1930 through January 1,
27 1978 to any independent medical research group or groups conducting research into the
28

1 relationship, if any, between exposure of those employees who work with asbestos-containing
2 products to asbestos and any pulmonary disease.

3 **RESPONSE TO INTERROGATORY NO. 38.:**

4 Chevron has no record of or knowledge of such expenditures.

5 **INTERROGATORY NO. 39.:**

6 Please state the names and addresses of the organization or groups conducting the studies
7 referred to in your answer to Interrogatory Nos. 37 and/or 38 above.

8 **RESPONSE TO INTERROGATORY NO. 39.:**

9 Not applicable.

10 **INTERROGATORY NO. 40.:**

11 Have you had a department, division or section devoted to scientific and/or medical
12 research during the period from 1930 until January 1, 1978? If so, please state its title(s) and
13 when it was first formed.

14 **RESPONSE TO INTERROGATORY NO. 40.:**

15 One of Chevron's predecessors had a department which was devoted to technical and
16 scientific research during the stated time frame. The title of the department and the date it was
17 formed are not presently know. Neither Chevron nor its predecessors had a department devoted
18 to medical research.

19 **INTERROGATORY NO. 41.:**

20 Please state the scientific or medical periodicals to which you, your medical department
21 or industrial hygiene division subscribed during the period between 1930 and 1964, specifying
22 the date such subscriptions were begun.

23
24 **RESPONSE TO INTERROGATORY NO. 41.:**

25 See responses to Interrogatory Nos. 34 and 40.
26
27
28

1 **INTERROGATORY NO. 42.:**

2 Please state whether any of your asbestos-containing products were provided with any
3 special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid
4 exposing workers to amounts of dust exceeding threshold limit values. If so, state:

- 5 (a) When these instructions were given;
6 (b) By whom these instructions were given;
7 (c) Whether the instructions were oral or written;
8 (d) The precise content of the instructions;
9 (e) If the instructions were written, please attach a copy of the instructions.

10 **RESPONSE TO INTERROGATORY NO. 42.:**

11 See responses to Interrogatory Nos. 2, 3 and 4. Investigation and discovery are
12 continuing.

13 **INTERROGATORY NO. 43.:**

14 Did any representatives of yours attend the 20th annual meeting of the IHF in November,
15 1955, in Pittsburgh, Pennsylvania? If so, give the name and current address of each such
16 attendee.

17 **RESPONSE TO INTERROGATORY NO. 43.:**

18 Following a diligent search and a reasonable inquiry, Chevron is unable to determine
19 whether any company representatives attended said meeting. Investigation and discovery are
20 continuing.

21 **INTERROGATORY NO. 44.:**

22 Have you received a copy or copies of the *Industrial Hygiene Digest* published monthly
23 by the IHF, and if so, state the date of initial receipt of such publication.

24 **RESPONSE TO INTERROGATORY NO. 44.:**

25 Chevron has no record of having received said publication. See response to
26 Interrogatory No. 34.

27 **INTERROGATORY NO. 45.:**

28 Have you ever requested IHF officials to:

1 (a) Perform a search of the medical literature to determine whether any scientists or
2 doctors were reporting cases of asbestosis and/or lung cancer in ship workers, mechanics, or
3 other working with or exposed to asbestos-containing products, or discussing the potential
4 hazards incident to use of asbestos-containing products;

5 (b) Perform any studies or research into potential health hazards incident to the use
6 of asbestos-containing products;

7 (c) Review governmental publications of Great Britain for determining whether
8 research was being conducted by the British government into any potential health hazards
9 incident to the use of insulation products containing asbestos;

10 (d) Review governmental publications of Great Britain to determine whether the
11 Chief Inspector of Factories, or any other British government agency, had issued any regulations
12 or published any findings relative to potential health hazards incident to the use of asbestos or
13 asbestos-containing products.

14 **RESPONSE TO INTERROGATORY NO. 45.:**

15 (a) No.

16 (b) No.

17 (c) No.

18 (d) No.

19 **INTERROGATORY NO. 46.:**

20 Did you at any time prior to January 1, 1980 warn any labor union representing ship
21 workers, mechanics, construction workers or others working with or exposed to asbestos-
22 containing products, of any potential health hazard from the use of asbestos or asbestos-
23 containing products?

24 **RESPONSE TO INTERROGATORY NO. 46.:**

25 No, not to our current knowledge.

26 **INTERROGATORY NO. 47.:**

27 If the answer to the preceding Interrogatory is in the affirmative, please state:

28 (a) The name of the union;

- 1 (b) How said union was informed;
2 (c) The date and place of said information or warning;
3 (d) The content and nature of said warning;
4 (e) The individual or individuals warned.
5

6 **RESPONSE TO INTERROGATORY NO. 47.:**

7 Not applicable.

8 **INTERROGATORY NO. 48.:**

9 State the name of all person who have acted in the capacity of medical librarian for you
10 from 1930 to January 1, 1978, give their current address, telephone number, and current position
11 with the company.

12 **RESPONSE TO INTERROGATORY NO. 48.:**

13 We are unaware of anyone ever having worked in that capacity at Chevron.

14 **INTERROGATORY NO. 49.:**

15 State whether you ever subscribed to or received or reviewed copies of the *Asbestos*
16 *Worker* magazine and state the years of subscription or receipt of this magazine.

17 **RESPONSE TO INTERROGATORY NO. 49.:**

18 Chevron has no record of having received said publication. See response to
19 Interrogatory No. 34 above.

20 **INTERROGATORY NO. 50.:**

21 Please state whether you subscribe to the *Asbestos* magazine, and list the inclusive dates
22 of your subscription.

23 **RESPONSE TO INTERROGATORY NO. 50.:**

24 Chevron is unaware of any such subscription.

25 **INTERROGATORY NO. 51.:**

26 Please identify all booklets, manuals, journals, and all publications directed from you
27 prior to January 1, 1980 to customers and users of all asbestos-containing products and the dates
28 said information was forwarded regarding the proper use and application of your asbestos-
containing products.

1 **RESPONSE TO INTERROGATORY NO. 51.:**

2 To the extent that any such publications existed, Chevron is unable to determine whether
3 they were ever actually directed to customers. Assuming such materials existed, and they were
4 actually directed to customers, Chevron is unable to determine the specific dates of such activity.

5 **INTERROGATORY NO. 52.:**

6 Please describe and identify all tests and experiments conducted by you prior to January
7 1, 1980 to determine whether or not asbestos fibers contained within your asbestos-containing
8 products would become airborne upon their being applied by asbestos workers or helpers.
9 Please state the dates of all tests and experiments, the results, and conclusions of each test and/or
10 experiment.

11 **RESPONSE TO INTERROGATORY NO. 52.:**

12 Chevron is unaware of any such tests.

13 **INTERROGATORY NO. 53.:**

14 At any time prior to 1964, were any tests or studies conducted or sponsored by you to
15 determine:

16 (a) The level of dust or fiber concentrations incident to:

- 17 (i) Cutting or sawing your asbestos-containing products;
18 (ii) Sanding your asbestos-containing products;
19 (iii) Tearing out the product during repair and maintenance functions;
20 (iv) Mixing asbestos-containing products.

21 (b) Whether long-term (20 years or more) exposure to products containing 15%
22 asbestos or less for work periods less than eight hours a day, both indoors and outdoors, which
23 resulted in the liberation of asbestos dust or fiber below five million particles per cubic foot
24 (mppcf) might cause asbestosis or expose such workers to an increased statistical risk of
25 contracting;

- 26 (i) Bronchogenic cancer;
27 (ii) Mesothelioma (pleural or peritoneal);
28 (iii) Gastrointestinal cancer.

1 **RESPONSE TO INTERROGATORY NO. 53.:**

2 (a) No, not to our current knowledge.

3 (b) No, not to our current knowledge.

4
5 **INTERROGATORY NO. 54.:**

6 State the date and the source from which you received your first notice and awareness of
7 TLV's pertaining to the concentration of airborne asbestos fibers.

8 **RESPONSE TO INTERROGATORY NO. 54.:**

9 Chevron is unable to determine the precise date and source that it first learned about
10 TLV's with respect to the concentration of airborne asbestos fibers.

11 **INTERROGATORY NO. 55.:**

12 Between 1930 and 1978, did you hear from any source of an alleged association between
13 asbestos exposure and the development of cancer, asbestosis and pulmonary disease?

14 **RESPONSE TO INTERROGATORY NO. 55.:**

15 The medical and scientific knowledge regarding the potential hazards of asbestos
16 exposure in different contexts was developed over many years, and is the subject of expert
17 testimony in ongoing litigation. To that extent, Chevron objects to this interrogatory on the
18 grounds that it seeks information that is protected from disclosure under C.C.P. § 2034, the
19 attorney-client privilege and/or the attorney work product doctrine. Without waiving these
20 objections, Chevron responds as follows: It is not possible to identify the specific time when its
21 awareness of the potential hazards of asbestos exposure occurred.

22 **INTERROGATORY NO. 56.:**

23 State when your knowledge as to the alleged association between the inhalation of
24 asbestos fibers and contraction of cancer and asbestosis was first acquired, and state the source
25 of that information.

26 **RESPONSE TO INTERROGATORY NO. 56.:**

27 The medical and scientific knowledge regarding the potential hazards of asbestos
28 exposure in different contexts was developed over many years, and is the subject of expert

1 testimony in ongoing litigation. To that extent, Chevron objects to this interrogatory on the
2 grounds that it seeks information that is protected from disclosure under C.C.P. § 2034, the
3 attorney-client privilege and/or the attorney work product doctrine. Without waiving these
4 objections, Chevron responds as follows: It is not possible to identify the specific time when its
5 awareness of the potential hazards of asbestos exposure occurred.

6 **INTERROGATORY NO. 57.:**

7 Do you subscribe to the United States Public Health Bulletin Service? If so, please state
8 the date when you first so subscribed to the Public Health Service Bulletin.

9 **RESPONSE TO INTERROGATORY NO. 57.:**

10 Chevron has no record of a subscription to the United States Public Health Bulletin
11 Service. See response to Interrogatory No. 34.

12 **INTERROGATORY NO. 58.:**

13 Please state the date when, if ever, you first notified your employees working in your
14 manufacturing plants and factories as to the need to wear and use respirators.

15 **RESPONSE TO INTERROGATORY NO. 58.:**

16 Chevron objects to this interrogatory on the grounds that it is overbroad and seeks
17 information which is not reasonably calculated to lead to the discovery of admissible evidence in
18 this case. Chevron further objects to this interrogatory on the grounds that it is burdensome and
19 oppressive particularly when the amount of work required to answer the question fully is
20 balanced against the utility, if any, of the information sought. Subject to and without waiver of
21 these objections, Chevron responds as follows: Chevron is unable to determine the exact date
22 that such notice was, if ever, given. Investigation and discovery are continuing.

23 **INTERROGATORY NO. 59.:**

24 Please state the date when you first notified workers applying your asbestos-containing
25 products as to the need to wear and use respirators.

26 **RESPONSE TO INTERROGATORY NO. 59.:**

27 Chevron objects to this interrogatory on the grounds that it is overbroad and seeks
28 information which is not reasonably calculated to lead to the discovery of admissible evidence in

1 this case. Chevron further objects to this interrogatory on the grounds that it is burdensome and
2 oppressive particularly when the amount of work required to answer the question fully is
3 balanced against the utility, if any, of the information sought. Subject to and without waiver of
4 these objections, Chevron responds as follows: See response to Interrogatory No. 42.

5 **INTERROGATORY NO. 60.:**

6 Have you ever published bulletins warnings your employees concerning the hazards of
7 inhaling asbestos and coming into contact with your asbestos-containing products? If so,
8 describe sufficiently for purposes of a notice to produce all such bulletins.

9 **RESPONSE TO INTERROGATORY NO. 60.:**

10 Chevron issued a compliance guideline for the Federal OSHA Asbestos Standard during
11 the mid 1980s. Also see responses to Interrogatory Nos. 2 and 13.

12 **INTERROGATORY NO. 61.:**

13 Have any of your officers, agents, servants or employees ever testified before any
14 governmental body regarding the possible harmful effects of asbestos exposure? If so, please
15 state:

- 16 (a) When and where such testimony was given;
17 (b) A summary of said testimony;
18 (c) If said testimony was recorded, and if so, attach a copy to the answer to these
19 interrogatories.
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1 **RESPONSE TO INTERROGATORY NO. 61.:**

2 No, not to our current knowledge.

3
4 DATED: October 16, 1998

5 STEPTOE & JOHNSON LLP

6
7
8 BY Ruth D. Kahn
9 Lawrence P. Riff
10 Ruth D. Kahn
11 Attorneys for Defendant
12 CHEVRON U.S.A. INC. d/b/a
13 CHEVRON PRODUCTS COMPANY
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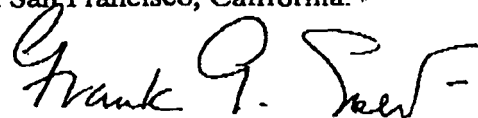
VERIFICATION

1, Frank G. Soler, declare as follows:

1. I am the Assistant Secretary for Defendant Chevron U.S.A. Inc., and I am authorized to make this verification on its behalf. I have read the foregoing RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES, and know the contents thereof.
2. Certain matters stated in the foregoing responses are not entirely within my personal knowledge. The information provided in the foregoing responses was assembled by authorized personnel and counsel.
3. The responses are given subject to subsequent correction of inadvertent errors or omissions, if such errors or omissions shall later be found to exist. Consequently, Chevron U.S.A. Inc., reserves the right to make any changes, if it appears at any time that inadvertent errors or omissions have been made, or additional or more accurate information becomes available.
4. Subject to the limitations set forth in paragraphs 2 and 3 above, I am informed and believe that the matters in the foregoing responses are true, and on that ground assert that the matters stated are true to the best of my present knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of October, 1998, at San Francisco, California.



Frank G. Soler

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES) SS.

On October 16, 1998, I served the foregoing document described as **CHEVRON U.S.A. INC. d/b/a CHEVRON PRODUCTS COMPANY'S RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES** on the parties in this action by placing ____ the original XX true copy thereof enclosed in sealed envelopes addressed as follows:

XX BY MAIL

XX I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, the correspondence is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing contained in the affidavit.

Executed on October 16, 1998, at Los Angeles, California.

BY PERSONAL SERVICE

I delivered such envelope by hand to the offices of the addressee. Executed on October ____, 1998, at Los Angeles, California.

XX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

_____ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Lee Williams
Signature

SERVICE LIST
Corbal, et al. v. Chevron, et al.

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