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IN RE: ASBESTOS LITIGATION

§ IN THE DISTRICT COURT
§
§ 352ND JUDICIAL DISTRICT
§
§ TARRANT COUNTY, TEXAS

NATIONAL GYPSUM COMPANY'S ANSWERS TO
MASTER SET OF DISCOVERY REQUESTS

TO: All Plaintiffs and their attorneys of record in asbestos cases filed in Tarrant County, Texas, pursuant to Standing Order No. 1, signed by Judge Bruce Auld on April 29, 1991.

COMES NOW, Defendant NATIONAL GYPSUM COMPANY and pursuant to the Texas Rules of Civil Procedure files these Responses to Plaintiffs' Master Set of Discovery Requests:

Respectfully submitted,

DeHAY & BLANCHARD
600 N. Pearl
Plaza of the Americas
2500 South Tower
Dallas, Texas 75201
Telephone: (214) 953-1313
Telefax : (214) 220-0439

By Gary D. Elliston / KEE
Gary D. Elliston (06584700)

Attorney for Defendant
NATIONAL GYPSUM COMPANY



NATIONAL GYPSUM COMPANY'S ANSWERS TO
MASTER SET OF DISCOVERY REQUESTS
KATHY\P106

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been forwarded to Plaintiffs' counsel of record, Mr. David Duke, 4025 Woodland Park Blvd., Suite 215, Arlington, TX 76013 and to Joseph F. Brueggar, Baron & Budd, 8333 Douglas Ave., 10th Floor, Dallas, Texas 75225 by Certified Mail, return receipt requested, and by Certified letter to all Defense counsel of record on the 21 day of June, 1991.

Gary D. Elliston/KEE
GARY D. ELLISTON

RESPONSES OF DEFENDANT NATIONAL GYPSUM COMPANY
TO PLAINTIFFS' MASTER DISCOVERY REQUESTS

National Gypsum Company ("National Gypsum") responds to Plaintiffs' Master Set of Discovery Requests including Interrogatories and Request for Production, (hereinafter referred to as "the Requests") only pursuant to, under the protection of and to the extent that such requests comply with the Texas Rules of Civil Procedure, as follows:

GENERAL OBJECTIONS

Defendant National Gypsum objects to any interrogatory, definition or instruction that purports to impose upon defendant any obligation not expressly set forth in the Texas Rules of Civil Procedure. In particular, National Gypsum objects to the definition of the term "you" on the ground that this term, as so defined, makes the interrogatories vague, overbroad and unduly burdensome.

Defendant National Gypsum objects to these interrogatories to the extent that they seek privileged or work product information or documents developed in anticipation of litigation or in preparation for trial.

Defendant National Gypsum objects generally to these interrogatories to the extent that they purport to require National Gypsum to provide information or documents with respect to all of its subsidiaries and affiliated companies, which are not parties in this case, on the grounds that, as so defined, the

interrogatories are overbroad, unduly burdensome, seek information and documents not relevant to the subject matter of this action, and are not reasonably calculated to lead to the discovery of admissible evidence.

PETITION FOR REORGANIZATION AND AUTOMATIC STAY

On October 28, 1990 National Gypsum filed a Petition for Relief Under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court in Dallas, Texas, No. 39037213-5AF-11. Pursuant to Section 362 of the Bankruptcy Code, the filing of that petition stayed certain legal proceedings against National Gypsum, including discovery against National Gypsum in this action. However, on November 7, 1990, the Bankruptcy Court granted National Gypsum's motion and entered an order modifying the automatic stay to permit the commencement and continuation of asbestos bodily injury claims for an interim 60 day period, upon certain conditions. Subsequently, on December 20, 1990, the Bankruptcy Court extended this interim period to April 26, 1991 and on April 25, 1991, the interim period was extended to August 15, 1991. These orders provide, in part, that "all discovery against the Debtor that, in the opinion of Debtor or its counsel, would impose unusual or unnecessary expenses on the Debtor, shall proceed only upon the prior approval of the [Bankruptcy] Court."

National Gypsum is making these discovery responses pursuant to the terms of the Bankruptcy Court's orders, based on information

and responses previously compiled in connection with other cases. To the extent that National Gypsum has objected to certain discovery requests as unduly burdensome, National Gypsum incorporates by reference the limitations imposed by the Bankruptcy Court. National Gypsum believes that unduly burdensome discovery requests are barred by the terms of the Bankruptcy Court's order. However, National Gypsum and its counsel are willing to attempt to resolve disagreements concerning such discovery requests.

INTRODUCTORY STATEMENT

These answers have been prepared by counsel for National Gypsum Company from information and previous responses compiled and maintained by counsel and the company. Mr. Russell Ward, Director of Corporate Public Affairs for National Gypsum Company, 9960 Brookford Street, Charlotte, North Carolina, reviews the answers to interrogatories and attests on behalf of National Gypsum to the accuracy of the answers for the purpose of satisfying the verification requirement. These answers are based upon reviews of National Gypsum documents and discussions with various National Gypsum personnel over a period of years. National Gypsum reserves the right to amend these answers on the basis of any further information that is obtained.

The information contained in the answers has been assembled by authorized employees and counsel for National Gypsum. It is not possible to reconstruct each step taken to gather this

information or to state that all documents that might possibly pertain to the matters at issue, which may have occurred many years ago, have been located or examined in connection with these answers. It is not possible to identify by name each person who could be said to have participated in the preparation of answers not to identify all documents that may have provided information.

RESPONSES

INTERROGATORY NO. 1

As to the person answering Plaintiffs' interrogatories, state:

- (a) Name;
- (b) Title or position with Defendant;
- (c) Business address;
- (d) Length of time employed by Defendant;

RESPONSE: See Introductory Statement. Mr. Ward has been employed by National Gypsum Company since February, 1956.

INTERROGATORY NO. 2

State the following concerning this Defendant:

- (a) Full and correct name;
- (b) Principal place of business;
- (c) State of incorporation;
- (d) Date of incorporation, and name of corporation;
- (e) Is this Defendant authorized to transact business in the State of Texas? If so, state the date such authority was first issued and last renewed;
- (f) Does this Defendant have an agent, representative or place of business in Texas? If so, state the name and address of such agent, representative, or place of business;
- (g) Does this Defendant have an agent for service in the State of Texas? If so, state the name and address of the registered agent.

RESPONSE: See Attachment 1. National Gypsum has been authorized and qualified to do business in the State of Texas since March 30, 1936. Its resident agent for service of process is CT Corporation System, Republic National Bank Building, Dallas, Texas 75221.

INTERROGATORY NO. 3

Has this Defendant been sued under its correct name? If not, state the correct legal name of the Defendant and provide the information requested in No. 2 above concerning the Defendant as correctly named.

RESPONSE: Yes.

INTERROGATORY NO. 4

Has this Defendant ever acquired through purchase, reorganization or merger another corporation, company or business which manufactured, sold, processed, distributed or contracted to apply insulation products containing asbestos?

RESPONSE: Yes.

INTERROGATORY NO. 5

If the answer to Interrogatory No. 4 is "Yes", then state the following concerning such predecessor:

- (a) Full and correct name;
- (b) The principal place of business;
- (c) State the incorporation;
- (d) Date of acquisition by Defendant;
- (e) Was this business authorized to transact business in the State of Texas?
- (f) Attach copies of all papers pertaining to the acquisition.

RESPONSE: See Attachment 2. National Gypsum does not know whether GIMCO was authorized to transact business in Texas. To the extent they exist, documents pertaining to this acquisition would be

included in National Gypsum's records, which are available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 6

As to any product containing asbestos in any form, has this Defendant, or any predecessor(s):

- (a) Ever designed such a product?
- (b) Manufactured such a product?
- (c) Processed such a product?
- (d) Sold such a product?
- (e) Distributed such a product?
- (f) Patented such a product?
- (g) Relabeled such a product which was manufactured, sold or distributed by another company?

RESPONSE: National Gypsum in the past has manufactured and sold some products that contained asbestos.

INTERROGATORY NO. 7

If your answer to No. 6(b), 6(d) and 6(e) is "Yes", then give the trade name of the product, the year the Defendant or predecessor first manufactured, sold or distributed such product, and the year the Defendant last manufactured, sold or distributed such product.

RESPONSE: See Attachments A - UU ("Product Attachments").

INTERROGATORY NO. 8

Have any of the products listed above in Interrogatory No. 6 been altered in chemical composition since first being marketed?

RESPONSE: Yes.

INTERROGATORY NO. 9

If so, please state:

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

RESPONSE: See Product Attachments. National Gypsum objects to providing further information on the ground that this interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. See Tex. R. Civ. Proc. 166b3(e). From time to time over many years, National Gypsum has altered the formula specifications for many of its products. It would be unduly burdensome to summarize all formula changes and the reasons for such changes, most of which have nothing to do with any issue in this case. However, product specifications are available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 10

In what year did the Defendant first begin selling or distributing asbestos-containing products?

RESPONSE: National Gypsum first began selling some asbestos-containing products in the early 1930's.

INTERROGATORY NO. 11

In what year did the Defendant last sell asbestos-containing products?

RESPONSE: National Gypsum ceased manufacturing and selling most asbestos-containing products by the early 1970's. It ceased manufacturing and selling all asbestos-containing products in 1981.

INTERROGATORY NO. 12

As to the named Defendant or any predecessor(s) or acquired business, state the various types of products, such as blocks, pipe covering, cements, tape, spray-on insulation, mastics and cloth, and in connection with

each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

RESPONSE: See Product Attachments.

INTERROGATORY NO. 13

Were each of your asbestos-containing products generally expected to reach, or were packaged to reach, the consumer of user, without substantial change in the condition in which it was sold?

RESPONSE: National Gypsum objects to this interrogatory as vague and ambiguous, since the term "consumer or user" is not defined or related to the plaintiffs. Without waiving these objections, National Gypsum states that its products generally were expected to reach a job site without substantial change. However, products might have been "changed" before they reached various workers on a job site. For example, for many products, water would have been added before application. See Product Attachments for additional information.

INTERROGATORY NO. 14

If your answer to Interrogatory No. 13. is "No", with respect to any product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the insulation helper or mechanic.

RESPONSE: See response to Interrogatory No. 13.

INTERROGATORY NO. 15

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of use, can these products be applied without liberating asbestos fibers?

- (a) If there is a different answer concerning different products manufactured, sold,

distributed, or used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

RESPONSE: National Gypsum objects to this interrogatory as vague, indefinite and irrelevant since methods of application varied and are not defined in the question or related to the plaintiffs. Without waiving these objections, National Gypsum states that the amount of dust created during use of products depended on the nature of the product, the method of application and many other factors. Many of National Gypsum's asbestos-containing products could be applied without creating dust. In addition, see Product Attachments.

INTERROGATORY NO. 16

Was it a foreseeable use of your asbestos-containing products that they may have to be removed, stripped or replaced at any time after installation? If your company contends the Plaintiffs misused any of your products then state how and under what circumstances your product was misused.

RESPONSE: National Gypsum objects to this interrogatory as confusing and misleading since the removal or replacement of products ordinarily would not be considered a "use" of the products. Without waiving these objections, National Gypsum states that for some products, removal or replacement at some time after installation could have been anticipated. However, most of National Gypsum's construction products ordinarily would not be removed or replaced after installation. National Gypsum does not have sufficient information to respond to this interrogatory at

this time to the extent that it concerns possible misuse of products.

INTERROGATORY NO. 17

Prior to releasing the products listed in Interrogatory No. 6 to the public for sale, were any tests (including dust level counts) conducted on same to determine potential health hazards involved in the use of materials contained therein?

RESPONSE: Prior to releasing its asbestos-containing products, National Gypsum generally was not aware of potential hazards associated with the use of such products, and it had not received any reports of asbestos-related injuries from users of such products. In addition, the materials used by National Gypsum in its products, including asbestos, were widely used by many other companies in many types of products. Accordingly, National Gypsum had no reason to conduct any such tests at that time.

INTERROGATORY NO. 18

If so, please state:

- (a) The name, address, and job classification of each individual who conducted such tests;
- (b) The results of such said tests;
- (c) Date of such said tests.

RESPONSE: Not applicable. See response to Interrogatory No. 17.

INTERROGATORY NO. 19

Did Defendant or any of its subsidiary companies make any design changes as a result of such test?

RESPONSE: Not applicable. See response to Interrogatory No. 17.

INTERROGATORY NO. 20

If so, please state:

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

RESPONSE: Not applicable. See response to Interrogatory No. 17.

INTERROGATORY NO. 21

After releasing said products to the public, were any tests (including dust level counts) conducted thereon to determine potential health hazards involved in the use of materials contained therein?

RESPONSE: See response to Interrogatory No. 17 and Attachments 4 and 5.

INTERROGATORY NO. 22

If so, please state:

- (a) The name, address, and job classification of each person conducting said tests.
- (b) The results of said tests.

RESPONSE: See Attachments 4 and 5. Additional information that may be responsive to this interrogatory may be included in the records available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 23

Has Defendant or its predecessor(s) ever conducted any studies concerning the effects of the inhalation of asbestos dust or fibers on one using or being exposed or any of your asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? In answer to this question, give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to who such reports were given, and the date.

RESPONSE: See response to Interrogatory No. 21.

INTERROGATORY NO. 24

Does Defendant have, have you ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

- (a) How much expended each year on research, etc.;
- (b) What percentage of gross sales did your company or its predecessor spend on research concerning the health affects of asbestos.

RESPONSE: See Attachment 6. To the extent this interrogatory requests additional information, National Gypsum objects to it as overbroad, unduly burdensome and on the ground that it requests information not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of relevant or admissible evidence.

INTERROGATORY NO. 25

State in detail the purpose, duties and responsibilities of such Research Department.

RESPONSE: See Attachment 6.

INTERROGATORY NO. 26

Does Defendant have, has it ever had, or has your predecessor ever had, a Medical Department? If so, give the year such Medical Department was established, and whether or not such Medical Department has operated continuously since being established.

- (a) Name each director, chief, or head of your Medical Department. Give the last known address of each.

RESPONSE: National Gypsum has never had a medical department.

INTERROGATORY NO. 27

State in detail the duties and responsibilities of such Medical Department.

RESPONSE: Not applicable.

INTERROGATORY NO. 28

Prior to 1965, did you, or any predecessor(s), ever at any time give persons who would be using or removing your asbestos-containing products instructions concerning safety precautions? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

RESPONSE: National Gypsum objects to this interrogatory as vague, overbroad and unduly burdensome. See Tex. R. Civ. Proc. 166b3(e). Without waiving these objections, National Gypsum states that product literature often contained instructions for use of products. For asbestos-containing products, these materials are organized by product category and are available for inspection in accordance with Attachment 3. In addition, see response to interrogatory No. 29.

INTERROGATORY NO. 29

If Defendant ever gave any warnings regarding its asbestos-containing products, please state:

- (a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your asbestos-containing products, or containers and/or in sales literature;
- (b) On what date was such actually first placed on your asbestos-containing products, containers or sale literature;
- (c) On what date did your asbestos-containing products, accompanied by such warning, first reach the insulation contractor?
- (d) State the exact wording of the first warning;
- (e) State the exact size of the warning printed on your asbestos insulation products, containers and/or in sales literature;
- (f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?

- (g) Why did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sale literature?
- (h) Did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sales literature because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, for who and on what date did you received such directive, command, suggestion, legal opinion, or other type of communication;
- (i) If the wording of the warning has ever been changed or altered, state when it was changed and the exact change in wording.

RESPONSE: See Product Attachments. Warnings similar to those described in the Product Attachments may have been included in some promotional literature subsequent to the time they were provided with the products. In addition, beginning in about 1970, National Gypsum distributed to some of its customers brochures and other information concerning potential health hazards of asbestos and applicable government regulations. Further information that may be responsive to this interrogatory may be included in the documents available for inspection in accordance with Attachment 3. To the extent this interrogatory requests additional information, National Gypsum objects to it as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. See Tex. R. Civ. Proc. 166b5.

INTERROGATORY NO. 30

Did Defendant ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos-containing products?

RESPONSE: Because of the nature of most of National Gypsum's asbestos-containing products, it would have been impossible to put an identifying logo on the products themselves. However, National Gypsum is aware that a membrane was applied to the back of Asbestibel, an asbestos-cement panel, which bore the watermark "Gold Bond Miracle Membrane." In addition, National Gypsum believes that prior to shipment, a Gold Bond label occasionally was attached to the back of the top sheet of a stack of asbestos-cement flat sheets.

INTERROGATORY NO. 31

Has Defendant, or your predecessor(s), ever devised an asbestos-free substitute product or formulation for your asbestos-containing products? If so, state the date that such product was first placed on the market.

RESPONSE: Most of the products described in the Product Attachments did not continue to be sold after asbestos was removed or the products were discontinued. National Gypsum did develop asbestos-free joint treatment and texture products in the early 1970'S. In addition, several other minor products were reformulated without asbestos as a result of formula changes. See Product Attachments.

INTERROGATORY NO. 32

Did Defendant or your predecessor ever recall any products containing asbestos from the common market?

- (a) State all details of such recall, giving the name of the products, the time of recall and any further action taken in connection with the recall.

RESPONSE: National Gypsum objects to this interrogatory as greatly overbroad and not reasonably calculated to lead to the discovery

of relevant or admissible evidence. See Tex. R. Civ. Proc. 166b5. Without waiving these objections, National Gypsum states that to the best of its knowledge, it has never recalled any of its products because of their asbestos content.

INTERROGATORY NO. 33

Has Defendant ever advised any contractor or distributor to whom you sell or sold your products containing asbestos of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor and the name of each contractor.

RESPONSE: National Gypsum is not aware of having advised contractors of specific ACGIH threshold limit values. National Gypsum did provide warnings with certain products at various times as described in the response to Interrogatory No. 29.

INTERROGATORY NO. 34

Did Defendant or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company the full address of the home office of such division or subsidiary company and the dates such division or subsidiary company was engaged in the contracting business.

RESPONSE: To the best of its knowledge, National Gypsum never had such a contracting business.

INTERROGATORY NO. 35

Did any division of Defendant engaged in the contract business of using asbestos products or your workmen's compensation insurance carrier ever have any claims for lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is

"Yes", give the names of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

RESPONSE: National Gypsum objects to this interrogatory as vague, ambiguous and confusing. National Gypsum did not have a contract business for the application of asbestos products, and National Gypsum employees generally did not work with finished products. Information about claims by employees in National Gypsum's manufacturing plants where raw asbestos fiber was used is not relevant in these cases. Without waiving these objections, see Attachment 10.

INTERROGATORY NO. 36

Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

RESPONSE: See response to Interrogatory No. 35.

INTERROGATORY NO. 37

Did you or your predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, and attach copies of such surveys.

RESPONSE: National Gypsum objects to this interrogatory as vague, indefinite, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. See Tex. R. Civ. Proc. 166b5. Without waiving these objections, National Gypsum states that it did perform dust tests in some of its manufacturing plants. National Gypsum objects to producing all such tests in its manufacturing plants on the ground

that details about conditions in its manufacturing plants are not relevant to any issue in this case and would be burdensome to compile. However, copies of such dust surveys would be included in the documents available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 38

State the year that this Defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.

RESPONSE: See Attachment 7.

INTERROGATORY NO. 39

When did any official with Defendant first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other diseases;
- (e) With reference to your company give the name of such official who first had such knowledge, information or understanding;
- (f) If there are any documents, records or memorandum of any kind concerning such knowledge, list them and attach copies.

RESPONSE: See Attachment 8. Further information that may be responsive to this interrogatory may be included in the documents available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 40

As to every product of yours which you have identified in previous interrogatories state specific type or types of asbestos, (i.e., crocidolite, chrysotile, amosite or any others) which your products contained. If you have any percentage figures available, then give the percentage as to each product.

RESPONSE: See Product Attachments. In addition, product specifications are available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 41

Set forth a list of photographs, plats, sketches, or other documents in your possession that will potentially be used as an exhibit at the trial of this case by you.

RESPONSE: Defendant objects to Interrogatory No. 41 as it seeks disclosure of attorney work product, mental impressions, conclusions, opinions, and/or theories of Defendant's counsel insofar as they relate to trial strategy. See Tex. R. Civ. Proc. 166b3(a). Subject to the foregoing objections and without waiving same, National Gypsum does not yet know what exhibits it may use at trial. Further information may be available from National Gypsum's local counsel at reasonable time before trial.

INTERROGATORY NO. 42

As of January 1, 1965, identify the quantity of each of your asbestos-containing products were stored in your warehousing facility or facilities awaiting sale to contractors or other concerns.

RESPONSE: National Gypsum objects to this interrogatory as vague, greatly overbroad, unduly burdensome and not reasonably calculated

- (b) What evidence exists as to the date of its first receipt;
- (c) The identity of the custodian of the document first received;
- (d) The identity of all persons in Defendant's employ who reviewed, or were made aware of the contents of the above-referenced document;
- (e) Any evidence presently in existence which supports your answers to this Interrogatory or its sub-parts.

RESPONSE: In recent years, as a result of asbestos litigation, National Gypsum's counsel may have obtained this article. After reasonable investigation, National Gypsum is unable to determine whether or when any of its employees may have obtained this article prior to its involvement in asbestos litigation.

INTERROGATORY NO. 45

Has Defendant ever warned or instructed any person or entity that exposure to asbestos dust should be limited to or below a specific level of exposure? If so, please state:

- (a) Whether the warning or instruction was oral or in writing;
- (b) If such warning or instruction was in writing, the custodian of that document, as well as the date of the instruction or warning;
- (c) The specific contents of any such instruction or warning;
- (d) The identity of the person or entity to whom such instruction or warning was given, as well as the dates such instruction or warning was given;
- (e) Any evidence presently in existence supporting your answers to the above-referenced questions and sub-parts of this Interrogatory.

RESPONSE: National Gypsum objects to this interrogatory as overbroad, unlimited in time, unduly burdensome and misleading. Without waiving these objections, National Gypsum states that warnings were provided with certain products at various times as

described in the response to Interrogatory No. 29. In addition, beginning in about 1970, National Gypsum distributed to some of its customers brochures and other information concerning potential health hazards of asbestos and applicable OSHA requirements regarding exposure to asbestos fibers. At various times, National Gypsum also advised its employees in its manufacturing plants to limit exposures to asbestos dust and OSHA regulations regarding standards for exposure in manufacturing facilities were displayed in some of National Gypsum's manufacturing plants. Documents and further information that may be responsive to this interrogatory would be included in the records available for inspection in accordance with Attachment 3.

INTERROGATORY NO. 46

Has Defendant ever warned, in any fashion, any person or entity that exposure to asbestos dust can cause cancer in humans. If so, please state:

- (a) Whether such warning was oral or written, and the date of each such warning;
- (b) The person or entity to whom such warning was given, and the date such warning was given;
- (c) The custodian of any documents evidencing such warnings;
- (d) Any evidence which supports Defendant's answers to this Interrogatory or the preceding sub-parts.

RESPONSE: National Gypsum objects to this interrogatory as vague, overbroad, unlimited in time, unduly burdensome and misleading. Without waiving these objections, National Gypsum states that warnings were provided with certain products at various times as described in the response to Interrogatory No. 29. In addition,

in the late 1970's National Gypsum provided information to employees in some of its manufacturing plants which included warnings that inhalation of excessive quantities of asbestos fiber over prolonged periods of time could increase the risk of developing cancer and mesothelioma. The subject of asbestos exposure and cancer also may have been discussed at general safety meetings at some of National Gypsum's manufacturing plants. Documents and further information that maybe responsive to this interrogatory would be included in the records available for inspection in accordance with Attachment 3.

RESPONSE TO REQUEST FOR PRODUCTION

1. Sales, purchase, installation or delivery records in the possession of, custody of, or subject to the control of Defendant, for all asbestos and asbestos-containing products used, sold, included as a component part of a product unit, manufactured, installed or otherwise distributed by Defendant, in the states of Texas. (Some examples of such products would be pipecovering, gasket material, packing, oakum, running rope, blankets, loose asbestos, asbestos rockwool, asbestos insulating cement, lagging, block, boiler and/or furnace insulating products, refractory products, wallboard, asbestos sprays, etc.).

RESPONSE: National Gypsum objects to this request as vague, greatly overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Without waiving these objections, National Gypsum will make its sales records, which are described in Attachment 9, available for inspection in accordance with Attachment 11.

2. Sales, purchase or delivery records in the possession of, custody of, or subject to the control of Defendant, for

all asbestos and asbestos-containing products manufactured, sold, installed or otherwise distributed by Defendant, to the jobsites and/or employers listed on Plaintiff's work history sheets and/or answers to interrogatories, and/or social security printouts.

RESPONSE: National Gypsum objects to this request as over-broad, unduly burdensome and impossible to answer since plaintiffs have not yet provided information concerning their employers or the jobsites on which they worked. Without waiving these objections, National Gypsum will make its sales records, which are described in Attachment 9, available for inspection in accordance with Attachment 11.

3. Any and all sales literature, including brochures, advertisements, pamphlets or other materials describing any and all asbestos-containing products manufactured, sold, installed or distributed by Defendant, their use and methods of application and/or installation.

RESPONSE: Voluminous advertising and promotional materials for National Gypsum's asbestos-containing products are organized by product category and are available for inspection in accordance with Attachment 11.

4. Any and all warning labels, inserts or other writings provided with any and all asbestos-containing products manufactured, sold, installed or distributed by you.

RESPONSE: Documents relating to warnings on National Gypsum's asbestos-containing products are included in the documents available for inspection in accordance with Attachment 11.

5. Any and all logos, writings, impressions or identifying markings which appeared on Defendant's insulation or asbestos-containing products.

RESPONSE: To the best of National Gypsum's knowledge, no logos or writings appeared on National Gypsum's asbestos-containing insulation products. Documents regarding logos placed National Gypsum's other asbestos-containing products, to the extent that they exist, may be included in the records available for inspection in accordance with Attachment 11.

6. Any and all labelling or relabelling agreements concerning asbestos products in existence since 1935 between the answering Defendant and other persons, including other Defendants.

RESPONSE: National Gypsum objects to this request as vague, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Without waiving these objections, National Gypsum states that documents that may be responsive to this request would be included in the records available for inspection in accordance with Attachment 11.

7. Any and all documents or other communications, including but not limited interoffice communications, that are now or have ever been in the possession, custody, or subject to the control of the Defendant, and which addressed the causal connection between exposure to asbestos or asbestos products and diseases.

RESPONSE: National Gypsum objects to this request as vague, greatly overbroad, unlimited in time and unduly burdensome, particularly to the extent that it requests documents prepared or obtained as a result of recent asbestos litigation. Further, the request is so broad that documents that could be responsive could be located in the files of various departments. Without waiving these objections, National Gypsum states that documents that may be responsive to this request, other than those arising out of

recent asbestos litigation, would be included in the documents available for inspection in accordance with Attachment 11.

8. The case captions, docket numbers, jurisdictions, and courts where any legal proceedings, including Workers' Compensation claims, have been filed in which the Defendant or its predecessors, subsidiaries, or affiliated entities have been a party and which concerned injuries arising from asbestos or asbestos-containing products.

RESPONSE: National Gypsum objects to this request as greatly overbroad, unlimited in time, oppressive, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. National Gypsum has been named as a defendant in thousands of asbestos-related lawsuits, and the requested information would be extremely burdensome, if not impossible, to compile and would serve no useful purpose.

9. Any and all written findings that are now or have ever been in the possession, custody, or subject to the control of the Defendant, which were made by any governmental agency, body, commission, or health organization, including, but not limited to, the United States Public Health Service, OSHA or NIOSH, and which concerned (1) specific hazards associated with the use and handling of asbestos and asbestos products, (2) any restrictions in the use of asbestos and asbestos products, (3) requirements for medical surveillance and examinations of workers, (4) dust monitoring, or (5) necessity of safety equipment.

RESPONSE: National Gypsum objects to this request as vague, greatly overbroad, unlimited in time, unduly burdensome and not reasonably calculated particularly to the extent that it requests documents obtained as a result of recent asbestos litigation. Without waiving these objections, National Gypsum states that documents that may be responsive to this request, other than those arising out of recent asbestos litigation, would be included in the

documents available for inspection in accordance with Attachment 11.

10. Any and all communications either received by Defendants from Dr. Irving Selikoff and/or Mt. Sinai or transmitted by Defendants to Dr. Irving Selikoff and/or Mt. Sinai prior to the publication of Dr. Irving Selikoff's article, "Asbestosis Exposure and Neoplasia," JAMA 188:142 (1963).

RESPONSE: To the best of National Gypsum's knowledge, it does not have any documents responsive to this request.

11. Any and all communications either received by you from or transmitted by you to Dr. Irving Selikoff after 1963, regarding the relationship between asbestos exposure and disease.

RESPONSE: See response to Request No. 10.

12. Any and all documents, including, but not limited to, preliminary and/or executed agreements, between you, Dr. Irving Selikoff, Mt. Sinai, any of the Defendants in this action and/or any trade associations, corporations or other business entities, relating to scientific research or studies to be performed, equipment and/or funding to be supplied, publications or non-publication of data, results, findings and/or opinions, relating to asbestos.

RESPONSE: National Gypsum objects to this request as vague, confusing, overbroad, unlimited in time, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence, particularly to the extent that it requests documents prepared or obtained by National Gypsum or its counsel as a result of recent asbestos litigation, or documents which may be protected as attorney work product. Further, National Gypsum should not be required to locate and produce documents relating to other companies that have been produced in other litigation or are available to plaintiffs' counsel from other sources. Without

waiving these objections, National Gypsum states that to the extent they exist, documents responsive to this request, other than those prepared or received as a result of recent asbestos litigation, would be included in the records available for inspection in accordance with Attachment 9. In addition, see Attachment 5.

13. Any and all documents concerning contributions to or summarizing findings or results of any studies or tests performed by the Saranac Lake Laboratory or the Trudeau Foundation relating to asbestos exposure and its effects upon human life.

RESPONSE: National Gypsum objects to this request as overbroad and unduly burdensome to the extent that it requests documents received by National Gypsum or its counsel as a result of recent asbestos litigation and which do not relate to National Gypsum and are available to plaintiffs' counsel from other sources. Without waiving these objections, National Gypsum states that to the best of its knowledge, it was not involved in any research relating to asbestos exposure performed by Saranac Lake Laboratory, and therefore no documents responsive to this request are included in its records.

14. Any and all documents which exist either in the files of the answering Defendant or which have come into the possession of the Defendant as a result of other proceedings or "asbestos litigation," that represent communications between any of the Defendants to this action, other manufacturers, suppliers or distributors of asbestos products, the United States Government, trade organizations, including, but not limited to, Asbestos Textile Institute, Industrial Hygiene Foundation, National Insulation Manufacturers Association, Asbestos Information Association, National Insulations Contractors Associations, Sprayed Mineral Fibers Manufacturers Association, Asbestos Cement Producers Association, Mineral Fibers Products Bureau, Gypsum Association, Refractories Institute, Portland Cement Association, Vermiculate

Institute, or scientific or medical foundations, such as Saranac Lake Laboratory or Mt. Sinai School of Medicine:

- (a) Discussing the possible relationship between asbestos exposure and asbestosis, lung cancer, mesothelioma and/or other diseases;
- (b) Medical or scientific studies concerning the relationship between asbestos exposure and asbestosis, lung cancer, mesothelioma and/or other diseases;
- (c) Discussing the publication or non-publication of any medical or scientific findings concerning such relationship;
- (d) Discussing warnings, safety equipment, or other preventative measures designed to prevent injuries resulting from exposure to asbestos.

RESPONSE: National Gypsum objects to this request as vague, greatly overbroad, unlimited in time and unduly burdensome, particularly to the extent that it requests documents prepared or received as a result of recent asbestos litigation. National Gypsum should not be required to locate and produce documents relating to other companies that have been produced in other litigation or are available to plaintiffs' counsel from other sources. Further, the request is so broad that documents that could be responsive could be located in the files of various departments and would be burdensome or impossible to compile. Without waiving these objections, National Gypsum states that documents that may be responsive to this request, other than those arising out of recent asbestos litigation, would be included in the documents available for inspection in accordance with Attachment 11.

15. Any and all documents identified in, or relating to, each of the Interrogatories which have been provided to you in this case by Plaintiffs herein.

RESPONSE: National Gypsum objects to this request as vague, greatly overbroad and unduly burdensome. In addition, see National Gypsum's Responses to each of Plaintiffs' Interrogatories, Introductory Statement and Attachments 3 and 11.

16. Copies of all reports of Defendants' experts and any and all documents relied upon or reviewed by such experts.

RESPONSE: See attached Exhibit "A". Further information may be available from National Gypsum's local counsel at a reasonable time before trial.

17. All minutes, reports or other documents concerning meetings of Defendant's Board of Directors or other corporate committees or subcommittees in which the subjects of: (1) acquiring or divesting entities which produced, marketed, installed, removed, or distributed insulation or asbestoscontaining products; (2) the hazards of asbestos or the safety of Defendant's insulation or asbestos-containing products; or (3) Defendant's potential liability from the insulation or asbestos containing products sold, installed, marketed, or distributed by Defendant or its predecessors or affiliated entities were discussed.

RESPONSE: National Gypsum objects to this request as vague, indefinite, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Without waiving these objections, National Gypsum states that except for a reference in 1980 to asbestos-related litigation, it is not aware of any references in its Board Minutes, through March 1981 when it last manufactured or sold asbestos-containing products, regarding the possible hazards of asbestos exposure.

18. All annual reports, financial statements or other formal corporate reports including accounting notes required under U.S., British or Canadian law for Defendant between 1960 and present.

RESPONSE: National Gypsum objects to this request as vague, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or admissible evidence. Without waiving these objections, National Gypsum states that National Gypsum's Annual Reports and other documents that may be responsive to this request would be included in the records available for inspection in accordance with Attachment 11.

ATTACHMENT 1 TO ANSWERS TO INTERROGATORIES

The full corporate name and current principal place of business of National Gypsum Company is:

National Gypsum Company
2501 Cedar Springs Road
Suite 700

Dallas, Texas 75201-1433

National Gypsum Company was incorporated under the laws of the state of Delaware under its present name on August 29, 1925. Its corporate headquarters were located in Buffalo, New York. In 1976, corporate headquarters were transferred to Dallas, Texas.

National Gypsum Company is a corporation. It had no prior name or predecessor corporation. It has never been incorporated in any state except Delaware. Over the course of its history, National Gypsum has acquired the assets or stock of various companies.

National Gypsum Company's Gold Bond Building Products Division was created in 1966. The Gold Bond Building Products Division designs, manufactures, sells, and distributes a wide variety of building products for use in the construction industry. At one time, the Gold Bond Building Products Division manufactured, sold, or distributed asbestos-containing products, although it no longer does so.

ATTACHMENT 2 TO ANSWERS TO INTERROGATORIES

On March 15, 1941, National Gypsum acquired General Insulating & Manufacturing Co. ("GIMCO"), Alexandria, Indiana. From about 1939 until 1941, GIMCO manufactured and sold GIMCO No. 340 Insulating Cement, which may have contained asbestos. Prior to 1941, GIMCO sold an asbestos roofing jacket in connection with certain styles of felted rock wool pipe covering. National Gypsum does not know the specifications of these products. National Gypsum does not admit that it has assumed the liabilities of GIMCO.

ATTACHMENT 3 TO ANSWERS TO INTERROGATORIES

The burden of deriving or ascertaining the answer to this interrogatory from National Gypsum's records is substantially the same for plaintiff as it is for National Gypsum. National Gypsum will make available for inspection at its Gold Bond Building Products Division Records Center in Charlotte, North Carolina, documents in its possession that may be relevant to the extent that they are known to exist, except for certain privileged and confidential documents and documents obtained only as a result of recent asbestos litigation. Russell F. Ward, Director of Corporate Public Affairs, is the custodian for these documents.

National Gypsum will afford plaintiff's counsel a reasonable opportunity to examine or inspect such records and to make copies. Counsel will be able to utilize all of the indices maintained by National Gypsum for the documents in the Records Center. These include a computer inventory list of the boxes at the Records Center, a Kardex index containing index cards describing individual boxes of documents and organized by company department, and several separate indices of lists covering materials from the Gold Bond Research Department. In addition, National Gypsum and its counsel have prepared an asbestos litigation index that covers only boxes containing documents relating to asbestos or asbestos-containing products. Gold Bond employees or counsel will be available to explain the indices,

answer questions concerning the records, and assist plaintiff's counsel in locating various categories of records.

National Gypsum reserves its right to review all documents selected by plaintiff's counsel as necessary to preserve legal objections and to require any party requesting copies of documents containing proprietary information to enter an appropriate confidentiality agreement.

ATTACHMENT 4 TO ANSWERS TO INTERROGATORIES

Although National Gypsum did not itself conduct medical research, in the early 1970's, it did conduct tests on certain joint compound and texture products in laboratory settings to determine the level of dust during use of the products, as follows: On April 22, 1971, the Hartford Insurance Group made dust measurements during preparation and application of a variety of products, including ready-mixed joint treatment compound, in a test setting. Results of these tests were within the OSHA limits for asbestos that were subsequently promulgated in 1972, but the 1972 OSHA ceiling concentration limits were exceeded during mixing and spraying of certain spray texture products.

On April 24, 1973, National Gypsum's Research Department made dust measurements during the sanding of Formula E, All Purpose G-1, and Ready Mix Topping and subsequent clean up activities in a test setting. Results of these tests were within applicable OSHA limits for asbestos.

On July 3, 1973, National Gypsum's Research Department made dust test measurements during the preparation and application of Vinyl Topping Compound in a test setting. Results of these tests were within applicable OSHA limits for asbestos during sanding, but exceeded OSHA ceiling concentration limits for asbestos during mixing.

On January 31, 1974, National Gypsum's Research Department made dust measurements during the sawing of asbestos cement flatsheets to insure that the research facility was in compliance with OSHA requirements. Results of the test were within applicable OSHA limits for asbestos.

In addition, National Gypsum is aware that the Gypsum Association made dust measurements during the application of joint treatment products in a test setting in about November, 1973.

The foregoing tests were conducted for the purpose of determining the applicability of proposed or existing OSHA regulations during use of these products. In accordance with OSHA regulations, warnings were placed on products whenever tests indicated that applicable OSHA limits for asbestos might be exceeded.

ATTACHMENT 5 TO ANSWERS TO INTERROGATORIES

National Gypsum is not aware of having conducted, sponsored or directly contributed to any studies or research concerning the health effects of the inhalation of asbestos dust or asbestos fibers generally. National Gypsum did pay dues and contribute to trade associations, which may have contributed to such studies or research. National Gypsum complied with applicable governmental regulations and industry standards relating to asbestos containing products.

In December 1972 and April 1973, National Gypsum Company had certain of its products, including asbestos containing products, tested by an independent laboratory for purposes of classification under the Federal Hazardous Substances Labeling Act. The tests established that none of the products tested (with the exception of Permaboard, which was found to be an ocular irritant) was a "toxic substance" within the Act, and consequently that none of them (with the exception of Permaboard) required cautionary labeling under the Act. A Rabbit Eye Irritation study run on Permaboard, an asbestos cement flat sheet, showed that when ground to a fine particle size and instilled into the conjunctival sac of a rabbit's eye, the test material produced eye irritation sufficient to require cautionary labeling in accordance with the Act. Other tests established that Permaboard did not require cautionary labeling

under the Act with respect to acute oral toxicity, primary skin irritation, acute dermal toxicity, or inhalation toxicity.

In 1967, National Gypsum participated in a study the United States Public Health Service was conducting of the asbestos products manufacturing industry in the United States. National Gypsum does not have information about the results of this study, and its participation was limited to permitting the Public Health Service to take dust counts at its New Orleans, Louisiana plant, and receiving the results of these dust counts.

The New Orleans plant also was included in a study, originally sponsored by the Quebec Asbestos Mining Association, of the health effects of the inhalation of asbestos fibers on workers in the asbestos cement manufacturing industry in the New Orleans area. The study began in about 1969. Analyses of the cohort which was the subject of the study and of various members of the cohort have appeared in various publications. The following articles, among others, may be relevant:

P. Enterline and H. Weill, "Asbestosis in Asbestos Cement Workers," Proceedings of International Conference on the Biological Effects of Asbestos, International Agency for Research on Cancer, Lyon (1973).

H. Weill, et al. "Radiographic and Physiologic Patterns Among Workers Engaged in Manufacture of Asbestos Cement Products, a Preliminary Report," Journal of Occupational Medicine, Volume 15 (March 1973).

H. Weill, et al. "Lung Function Consequences of Dust Exposure in Asbestos Cement Manufacturing Plants," Archives of Environmental Health, Volume 30, pp. 88-97 (February 1975).

H. Weill, C. E. Rossiter, C. Waggenpack, R. N. Jones, and M. M. Ziskind, "Differences in lung effects resulting from chrysotile and crocidolite exposure," in Proceedings of Fourth International Symposium on Inhaled Particles and Vapors, ed. by W. H. Walter, Pergamon Press, Oxford and New York, pp. 789-797 (1977).

J. E. Diem, R. N. Jones, J. C. Gilson, H. W. Glindmeyer, and H. Weill, "The influence of asbestos exposure on radiographic progression and functional decline," in Proceedings of Fifth International Conference on Pneumoconioses, Caracas, Venezuela (1978).

J. M. Hughes, C. Waggenpack, and H. Weill. "Mortality study of workers engaged in manufacture of asbestos cement products," in Proceedings of National Meeting of American Lung Association/American Thoracic Society, Boston (1978).

H. Weill, J. M. Hughes, and C. Waggenpack. "Influence of dose and fiber type on respiratory malignancy risk in asbestos-cement manufacturing," American Review of Respiratory Diseases, Vol. 119, pp. 345-354 (1979).

R. N. Jones, J. E. Diem, J. C. Gilson, H. W. Glindmeyer, and H. Weill, "Progression of asbestos radiographic abnormalities: Relationships to measure of dust exposure and annual decline in lung function," in Biological effects of mineral fibers, ed. by J. C. Wagner, IARC Scientific Publications, Vol. 2, No. 30, pp. 537-543, Lyon (1980).

J. M. Hughes and H. Weill. "Lung cancer risk associated with manufacture of asbestos cement products," in Biological effects of mineral fibers, ed. by J. C. Wagner, IARC Scientific Publications, Vol. 2, No. 30, pp. 627-635, Lyon (1980).

R. D. DeShazo, D. J. Hendrick, J. E. Diem, J. A. Nordberg, Y. Baser, D. Bevier, R. N. Jones, H. W. Barkman, J. E. Salvaggio, and H. Weill, "Immunologic aberrations in asbestos cement workers: dissociation from asbestosis," in Journal of Allergy Clinical Immunology, Vol. 72, pp. 454-461 (1983).

ATTACHMENT 6 TO ANSWERS TO INTERROGATORIES

National Gypsum has never had a medical department. National Gypsum has maintained a research department to test and develop products and to provide technical assistance to all departments at least since 1928. From 1928 until 1954, research facilities were decentralized and were located at various plants throughout the United States. In 1954, the department was consolidated in Buffalo, New York, and it has been there continuously since that date.

The following individuals have held the position listed:

<u>Approximate Dates</u>	<u>Individuals</u>	<u>Titles</u>
Prior to 1944	Dean D. Crandell	Director of Research
1944-1947	Dean D. Crandell	Vice President in Charge of Research
1945-1952	Frank L. Marsh	Director of Research
1952-1955	William H. Harding	Director of Research
1955-1965	Dean D. Crandell	Vice President in Charge of Research
1965-1977	Donald G. Hamme	Director of Research
1977-1983	Walter E. Voisinet	Director of Research

ATTACHMENT 7 TO ANSWERS TO INTERROGATORIES

As the American Conference Of Governmental Industrial Hygienists (ACGIH) has defined the term, National Gypsum understands "threshold limit value" to refer to the recommended maximum concentration of airborne asbestos fibers greater than 5 microns in length. National Gypsum also understands "threshold limit" to mean the dose below which disease would not occur.

National Gypsum was not a member of the ACGIH and did not participate in experiments, studies, or tests to determine what the threshold limit value for asbestos should be. National Gypsum believes that the ACGIH established a threshold limit value (maximum allowable concentration) for exposure to asbestos dust of 5 million particles per cubic foot (mppcf) in 1946. National Gypsum is unable to determine how or when one or more of its employees first became aware of the ACGIH threshold limit value, but believes it was aware of such a value at least by 1971.

National Gypsum believes that it became aware in approximately 1974 that the ACGIH threshold limit value for exposure to asbestos was to 5 fibers greater than 5 microns in length per cubic centimeter, and that it became aware in approximately 1980 that the ACGIH threshold limit value for exposure to chrysotile asbestos had been changed to 2 fibers greater than 5 microns in length per cubic centimeter.

National Gypsum believes that it never advised customers, distributors, contractors, or government agencies of ACGIH threshold limit values. National Gypsum does not know whether trade associations disseminated such information for exposure to asbestos dust.

National Gypsum was also aware of and complied with OSHA regulations concerning airborne asbestos fiber that were promulgated beginning in 1971.

ATTACHMENT 8 TO ANSWERS TO INTERROGATORIES

Knowledge of Potential Hazards

National Gypsum cannot identify the precise date or manner in which one or more of its employees might have become aware of alleged claims of health hazards associated with the inhalation of asbestos fibers. National Gypsum believes that at least three of its former employees were aware of the disease asbestosis in 1949, although National Gypsum has been unable to determine the source, nature or extent of their knowledge. In addition, National Gypsum believes that one or more of its employees, such as its safety director, became aware at least by 1953 that inhalation of excessive amounts of asbestos fibers by human beings over long periods of time could cause asbestosis. This kind of high level exposure could occur in certain manufacturing operations utilizing raw asbestos, in the absence of dust control measures.

National Gypsum believes that it was aware by the late 1960's of an alleged association (1) between the presence of asbestosis and the contraction of lung cancer and (2) between the inhalation of asbestos fiber and the contraction of mesothelioma, but it cannot identify the source, date, or extent of its information.

National Gypsum further states that throughout the 1950's and 1960's, consistent with medical and scientific knowledge at that time, National Gypsum believed that there was a

safe level of asbestos to which a person could be exposed without risk of injury; and that persons who were not exposed to excessive amounts of asbestos for many years would not become sick. In addition, National Gypsum was not aware in this time period of any reports of asbestos-related injuries or illness by users of its finished asbestos-containing products.

ATTACHMENT 9 TO ANSWERS TO INTERROGATORIES

National Gypsum's records of asbestos product sales are maintained at its Gold Bond Building Products Division facilities in Charlotte, North Carolina. The documents are in the custody of Russell F. Ward, Director of Corporate Public Affairs for National Gypsum Company.

National Gypsum has been able to locate and assemble a substantial number of its sales records, which, although not complete, provide a great deal of information about the sales of National Gypsum's asbestos products. These records include more than 2,000,000 microfilmed invoices. The microfilmed invoices reflect sales to government agencies from 1943 through 1955 and to companies from 1945 through 1955. They are organized chronologically by year and then alphabetically by customer name within each year.

National Gypsum also has dealer sales summaries recording sales of Gold Bond products to customers from 1959 through 1981, the last year National Gypsum's Gold Bond Division sold any asbestos products. They are largely organized by geographical sales district. These sales records are organized by year within each sales district and then alphabetically by customer within each year. During document review at the Records Center, company employees can identify the sales districts responsible for sales to relevant geographical areas at relevant

ATTACHMENT 10 TO ANSWERS TO INTERROGATORIES

Workers' Compensation Claims

From a review of available records concerning workers' compensation claims, National Gypsum has compiled the following information concerning the earliest asbestos-related compensation claims filed against it:

1. Claimant: Peter Paul Armenti
Date of Claim: Unknown (Judgment entered on
January 27, 1959)
Alleged Injury: Asbestosis
Plant Where Employed: Millington, New Jersey
2. Claimant: Louis D. Cavinato
Date of Claim: Unknown (Judgment entered on
April 19, 1965)
Alleged Injury: Asbestosis
Plant Where Employed: Millington, New Jersey
3. Claimant: Alton Eugene Bass
Date of Claim: February 28, 1968
Alleged Injury: Asbestosis and/or silicosis
and/or pneumoconiosis
Plant Where Employed: New Orleans, Louisiana
4. Claimant: Louis Gremillion
Date of Claim: Unknown (Judgment entered on
May 31, 1968)
Alleged Injury: Asbestosis, blastomycosis
Plant Where Employed: New Orleans, Louisiana
5. Claimant: William Burns
Date of Claim: Unknown (Judgment entered on
September 12, 1969)
Alleged Injury: Asbestosis, pneumoconiosis
Plant Where Employed: Millington, New Jersey
6. Claimant: John Weber
Date of Claim: October 10, 1969
Alleged Injury: "Pulmonary Disability"
Plant Where Employed: Millington, New Jersey

All of the foregoing claims were filed by workers employed at plants which used large amounts of raw asbestos fiber and cement to manufacture asbestos-cement products, such as siding and flat sheets. These employees did not install finished products. National Gypsum is not aware of any other asbestos-related claims received prior to 1970.

ATTACHMENT 11 TO RESPONSE TO DOCUMENT REQUEST

National Gypsum Company ("National Gypsum") currently retains records, including records relevant to the asbestos litigation, at its Gold Bond Building Products Division Records Center in Charlotte, North Carolina. Russell F. Ward, Director of Corporate Public Affairs, is the custodian of these records. Except for certain privileged or confidential documents and certain documents irrelevant to asbestos litigation, these records are available for plaintiff to inspect and copy pursuant to the procedure outlined below.

The records at the Records Center in Charlotte, North Carolina, are available for inspection during normal business hours, at a mutually convenient date to be arranged in advance with National Gypsum's counsel. These records generally are organized as maintained by National Gypsum in the normal course of its business. However, advertising and promotional materials relating to asbestos-containing products have been segregated by product type.

Counsel will be able to review all of the indices maintained by National Gypsum covering the documents at the Records Center. These include a computer inventory list of the boxes at the Records Center and a Kardex index containing index cards which are organized by company departments and which describe the contents of the boxes at the Records Center. Several separate indices or lists covering materials from the

Gold Bond Research Center are also available. In addition, National Gypsum and its counsel have prepared an asbestos litigation index with its own table of contents that covers boxes containing documents relating to asbestos or asbestos-containing products. This index has index sheets that describe the contents of each box and are organized into various categories by department or subject matter. Gold Bond employees or counsel also will be available to explain the indices, answer questions concerning the records and assist plaintiff's counsel in locating various categories of records.

Any documents selected for copying will be sent to a professional copying center for copying and stamping with identification numbers. Plaintiff will be responsible for the cost of one copy of all documents selected and for all man-hour charges attributable to photocopying and stamping.

Because National Gypsum is making available for inspection many documents that it has not reviewed, National Gypsum reserves the right to review the documents selected by plaintiff's counsel, and to assert appropriate claims of privilege, confidentiality or non-relevance. These documents are produced for inspection only on the condition that any such claims of privilege are not waived by the inspection process.

ATTACHMENT A TO ANSWERS TO INTERROGATORIES

National Gypsum Company sold chrysotile asbestos fiber from July, 1958 until October, 1974. Until September, 1973, this asbestos fiber was obtained from National Asbestos Mines, Ltd., a wholly-owned subsidiary of National Gypsum (Canada) Ltd., a wholly-owned subsidiary of National Gypsum Company. National Asbestos Mines, Ltd., was located in Thetford Mines, Quebec. In September, 1973, all of its assets were sold and it ceased operations. From September, 1973 until October, 1974, National Gypsum Company obtained asbestos fiber from Asbestos Corporation, Ltd. for resale. Chrysotile asbestos generally is light gray in color, although the color may have varied.

Asbestos fiber had numerous uses, as determined by the user based on the type and grade of the fiber and the user's particular needs. National Gypsum did not provide its customers with direction or manuals regarding the use of asbestos fiber, except for the warning described below.

Gold Bond asbestos fiber was packaged in various types and sizes of jute, paper or polyethelene bags. At one time, the bags were tan with orange diagonal stripes and bore the name "Gold Bond" printed in large black letters with the word "Asbestos" in a black band below the words "Gold Bond." Above the word "Asbestos" the fiber grade appeared in black letters. The asbestos was identified as "A Product of Canada" and the source was shown as "National Asbestos Mines Limited."

Beginning in about 1969, the bags bore the following warning label:

CAUTION

This bag contains chrysotile asbestos fibers. Persons exposed to this material should use adequate protective devices as inhalation of this material over long periods of time may be harmful.

Some time in 1972, the caution label was changed to read as follows:

CAUTION

CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

Sales brochures were prepared regarding asbestos fiber, and advertisements for the product were prepared for Asbestos Magazine, Modern Plastics, Chemical Materials Catalog, and Chemical Week Buyer's Guide.

ATTACHMENT B TO ANSWERS TO INTERROGATORIES
Various Asbestos-Cement Products - Warnings

In about 1970, National Gypsum distributed to some of its customers a booklet concerning recommended practices for handling various asbestos cement products.

On November 1, 1972, National Gypsum sent some asbestos cement product customers a letter advising them of Federal Regulations regarding asbestos-containing materials. Included in the letter were lists of laboratories equipped to determine compliance with OSHA standards for asbestos exposure and suppliers of dust collecting equipment and respirators.

Sometime in 1973, National Gypsum began including a "caution notice" between the top two pieces in every crate, pallet, skid, or other shipping unit of its asbestos cement wall panels, flat sheets, and corrugated products. The notice read:

NOTICE

The asbestos fibers in this cement-asbestos product are embedded and permanently bonded in Portland Cement and will not create dust during normal handling and usage.

In fabricating or installing operations avoid creating dust by scoring and snapping whenever possible. Certain methods of cutting, drilling or sanding may produce dust. It is then recommended either that equipment with approved dust collectors be used or that operators and nearby personnel be provided with a U.S. Bureau of Mines-approved respirator.

In accordance with recent government regulations the following notice is provided:

CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause
Serious Bodily Harm

Sometime in 1975, the caution notice was revised. This revised notice read:

NOTICE

The asbestos fibers in this cement-asbestos product are embedded and permanently bonded in Portland Cement and will not create dust during normal handling and usage.

In fabricating and installing operations avoid creating dust by scoring and snapping wherever possible. Certain methods of cutting, drilling or sanding may produce dust. It is then recommended either that equipment with approved dust collectors be used or that operators and nearby personnel be provided with a NIOSH or MESA approved respirator.

In accordance with recent government regulations the following notice is provided:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

About this time, National Gypsum also began to print this notice on the cartons in which asbestos cement ceiling panels, soffits, and perforated panels were packaged.

In 1978, the text of the notice was revised again.
The 1978 notice stated:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

On November 21, 1978, National Gypsum began placing
this caution statement on all siding cartons.

All 3 notices were printed in black ink on white 8-1/2"
x 11" paper.

ATTACHMENT C TO ANSWERS TO INTERROGATORIES

A-C Board

From 1943 until 1953, National Gypsum sold asbestos-cement board manufactured by Keasbey & Mattison Company, Ambler, Pennsylvania, and St. Louis, Missouri, as "Gold Bond A-C Board" and as "Gold Bond Asbestos Cement Board". Other varieties of this product were "K&M X-4 Marine Board," "K&M C-4 Marine Board," and "Gold Bond Flexbestos." Various types of board were available in 4' x 8' sheets in 1/8", 3/16", 1/4" and 3/8" thicknesses. It was used as a fireproof, waterproof, and weatherproof sheet for interior linings and exterior surfaces of structures and could be applied with nails or screws. The product was shipped in stacks. National Gypsum also sold accessories, such as battens, manufactured by Keasbey & Mattison.

The composition of Gold Bond A-C Board is unknown, except that it contained portland cement and asbestos fiber. National Gypsum is not aware of any patents relating to this product. National Gypsum is not aware of any warnings that accompanied this product; further, it was not aware of any possibility of injury from the use of Gold Bond A-C Board that would have required any such warning.

This product was sold primarily to the construction industry. Although the product was approved for federal public housing and federal government structures and required for many government jobs, National Gypsum has discovered no records of

sales to any governmental agency. In about 1943 the United States Coast Guard accepted Gold Bond A-C Board manufactured by Keasbey & Mattison as incombustible material for merchant vessels. Coast Guard approval was renewed in 1947 and in 1952,* but National Gypsum believes that only one type of this board may have been sold for marine use. National Gypsum is not aware of any sale of that variety after 1945.

National Gypsum discontinued the sale of Gold Bond A-C Board in 1953 when it obtained facilities to manufacture a similar product.

* From 1957 through 1977, Keasbey & Mattison's A-C Board continued to be listed as an approved product of National Gypsum's by the U.S. Coast Guard even though National Gypsum no longer sold this product.

ATTACHMENT D TO ANSWERS TO INTERROGATORIES

All Weather Caulking Compound

National Gypsum Company sold an asbestos-containing caulking compound, All Weather Caulking, from approximately 1960 to 1974. This product was intended for use with asbestos cement corrugated roofing. It was applied with a caulking gun to the side and end laps of corrugated roofs.

All Weather Caulking was an elastomeric non-oxidizing polymer, which contained asbestos as an extender. National Gypsum does not know how much asbestos this product contained, what type of asbestos was used in its composition, or who supplied the asbestos used in this product. The product was grey in color. National Gypsum does not know of any changes in this product's design or of any reformulations of the product.

National Gypsum purchased this product from American Marietta Company for re-sale under the Gold Bond label. All Weather Caulking was shipped in one gallon cans, six to a case; five gallon cans; and 55 gallon drums. Each can carried a label showing the brand and type of contents.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to this product's packaging. Further, dust ordinarily would not have been created during use of this product, and National Gypsum was not aware of any possibility of injury from the use of this product that would have required any such warning.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum is not aware of any other trademarks on this product, nor is it aware of any patents on this product.

National Gypsum discontinued the sale of All Weather Caulking in 1974 because it was replaced with a strip latex product. To the best of National Gypsum's knowledge, this change was unrelated to the asbestos content of All Weather Caulking.

ATTACHMENT E TO ANSWERS TO INTERROGATORIES

Siding Shingles

At various times throughout the period between 1953 and 1981, National Gypsum Company sold a number of different types of asbestos cement siding shingles for use on residential homes. They were Classic Shake, Classic "32", Chromatone and Chromatone Autoclaved, Chromashake and Chromashake Autoclaved, Chromatex and Chromatex Autoclaved, Woodgrain and Woodgrain Autoclaved, Deeptex, and Sussex "32".

The shingles were manufactured in Millington, New Jersey (1953-1975); St. Louis, Missouri (approximately 1954-1971); and New Orleans, Louisiana (approximately 1954-1981). The asbestos content of these shingles varied between approximately 11.9% and 21.7% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some siding shingles, if needed to improve filtration or drainage during the manufacturing process. In addition, at some time during 1959, a small percentage of crocidolite may have been substituted for the same amount of chrysotile in some of the shingles manufactured in New Orleans, Louisiana.

Siding shingles came in a wide variety of colors and were 12" x 24", 9" x 32", or 14 3/4" x 32".

Siding shingles were applied by nailing them to exterior side walls and came with pre-punched holes for nails or

other fasteners. The holes were punched so that nails driven through them rested on the top edges of the next lower course of shingles and acted as guides for correct alignment. Ordinarily, little or no dust would be created during installation of this product.

Shingles were packaged in bundles secured with banding wire. Three edges of each bundle were covered by a corrugated paper boot.

As of November 21, 1978, National Gypsum began placing the following asbestos caution statement on all siding shingle cartons:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

The notice was printed in black ink on white 8-1/2" x 11" paper.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

ATTACHMENT F TO ANSWERS TO INTERROGATORIES

Asbestone Panels

Gold Bond Asbestone panels were building construction products made of two asbestos cement flat sheets laminated, in sandwich fashion, to each side of a central core. All cores were asbestos-free. Gold Bond is a registered trademark of National Gypsum Company.

National Gypsum manufactured Asbestone panels from 1957 through 1979 at its New Orleans, Louisiana plant. They were discontinued in 1979 because of poor sales. The asbestos-cement flat sheets contained approximately 28%-30% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small amount of amosite may have been substituted for the same amount of chrysotile, if needed to improve filtration or drainage during the manufacturing process.

The panels came in various lengths in natural gray, primed and in several colors.

Gold Bond Asbestone panels were normally installed in metal framing systems with bolts, clips, or other types of fasteners.

Asbestone panels were stacked on wooden pallets and, in some cases, strapped to the pallets with steel or plastic banding.

Asbestos caution notices were first included with this product in 1973. See Caution Notice Attachment.

ATTACHMENT G TO ANSWERS TO INTERROGATORIES

Ceiling Panels

Over the years National Gypsum sold a wide variety of ceiling tiles or panels, most of which did not contain asbestos. However, National Gypsum did sell a number of asbestos cement panels intended for use in ceiling construction. These were Gold Bond Perforated, Unperforated, Asbesto-Grid, Ventilating, Asbestibel, and Humiguard panels. Perforated, AsbestoGrid, Ventilating, and Asbestibel panels were specifically designed for acoustical ceilings. Humiguard was intended for ceilings in commercial food processing plants only.

Perforated panels were asbestos cement panels pierced with small holes; they were gray in color until 1958 and were white from 1959 to 1981. Asbestibel panels were perforated, backed with a sound-absorptive membrane, and white in color. Humiguard had a pink, moisture-resistant backcoating; the surface was rippled and white in color. The other ceiling products were variations on Perforated panels: Unperforated (the same material as Perforated but with no holes), Asbesto-Grid (Perforated panels cut to size for grid systems), and Ventilating (Perforated panels backed with a yellow-tinted, moisture-resistant coating).

National Gypsum began to sell asbestos-cement ceiling panels at least as early as 1941, and continued to do so until 1981. Prior to 1958 the panels were purchased for resale from Keasbey & Mattison Company, Ambler, Pennsylvania.

Thereafter, the panels were manufactured in St. Louis, Missouri (1958-1961) and New Orleans, Louisiana (1958-1981). National Gypsum discontinued marketing asbestos-cement ceiling panels when its New Orleans plant was sold, and National Gypsum went out of the asbestos-cement products business.

The asbestos content of asbestos-cement ceiling panels ranged from approximately 15.1% to 18.1% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some of these ceiling panels, if needed to improve filtration or drainage during the manufacturing process.

Asbestos-cement ceiling panels came in various standard sizes. All could be installed by placing them in suspended grid ceiling systems. Perforated panels could also be applied to metal or wood furring strips with mechanical fasteners. Ordinarily, little or no dust would be created during installation of these products. Ceiling panels for acoustical systems were to be installed only by contractors approved by National Gypsum.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum also had registered trademarks on the name "Asbestibel" and "Humiguard." It applied for a trademark on the name "Asbesto-Grid," but never registered it. National Gypsum is unaware of any patents on its asbestos cement ceiling panels.

Ceiling panels were packaged in corrugated boxes -- six or ten panels to the box.

On November 1, 1972, National Gypsum sent some asbestos cement customers a letter advising them of federal regulations regarding asbestos-containing materials. Included in the letter were lists of laboratories equipped to determine compliance with OSHA standards for asbestos exposure and suppliers of dust collecting equipment and respirators.

Sometime in 1975, National Gypsum printed the following notice on the cartons in which asbestos cement ceiling panels were packaged:

NOTICE

The asbestos fibers in this cement-asbestos product are embedded and permanently bonded in Portland Cement and will not create dust during normal handling and usage.

In fabricating and installing operations avoid creating dust by scoring and snapping whenever possible. Certain methods of cutting, drilling or sanding may produce dust. It is then recommended either that equipment with approved dust collectors be used or that operators and nearby personnel be provided with a NIOSH or MESA approved respirator.

In accordance with recent government regulations the following notice is provided:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

In 1978, the text of the notice was revised. The 1978
notice stated:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

ATTACHMENT H TO ANSWERS TO INTERROGATORIES

Canal Bulkheading

Gold Bond Canal Bulkheading was manufactured by National Gypsum Company as a special type of asbestos cement corrugated sheet intended for use in preventing soil erosion along inland waterways and canals.

Bulkheading was manufactured in New Orleans, Louisiana (1959-1981). Gold Bond manufactured three types of bulkheading. Additionally, National Gypsum purchased Type 10 bulkheading from Johns-Manville for resale from 1963 to 1974.

All three types of bulkheading manufactured by National Gypsum contained chrysotile asbestos, and bulkheading Types 2 and 3 also contained crocidolite. In September 1973, National Gypsum revised its specification for Type 2 to delete crocidolite as an ingredient. In September 1974, National Gypsum revised the specifications for Type 3 to delete crocidolite as an ingredient. The asbestos fiber content of bulkheading ranged from 16.3%-30.4% by weight. These products were discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

Installation techniques for canal bulkheading varied depending upon several technical considerations such as soil type, water depth, tide, wind and wave action, and freezing conditions. The bulkheading sheets were installed by jetting them into the earth along canal banks. After sheets were jetted in

place, a wooden form was attached along the top and a concrete cap was poured. The sheets were secured to concrete anchors by steel reinforcing rods.

Bulkheading was shipped stacked on wooden pallets and was sometimes strapped with steel or plastic banding.

Asbestos caution notices were first included with canal bulkheading in 1973. See Caution Notice Attachment.

ATTACHMENT I TO ANSWERS TO INTERROGATORIES

Corrugated "Economy 250"

Gold Bond Corrugated "Economy 250" was a lightweight corrugated asbestos cement sheet intended for use in construction of sidewalls and roofs on industrial, commercial, and farm buildings.

"Economy 250" came in various sizes and was usually "natural cement gray." In the early 1960's, Gold Bond began to market "Economy 250" in other colors.

"Economy 250" was manufactured in New Orleans, Louisiana (approximately 1954-1981). Asbestos fiber content by weight was approximately 18.5%-22.8% chrysotile. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

"Economy 250" was applied to wood supports with 3" long ring shank nails and neoprene washers. It was also applied by clipping or fastening to metal framing. "Economy 250" was also sold in smaller sizes as "Garden Trim." Garden Trim was installed by wedging it approximately 4 inches into the ground.

Gold Bond is a registered trademark of National Gypsum Company. National Gypsum is not aware of any other trademark on this product, nor is it aware of any patents on this product.

"Economy 250" was stacked on wooden pallets and was strapped to the pallets with steel or plastic banding.

Asbestos caution notices were first included with "Economy 250" in 1973. See Caution Notice Attachment.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products businesses.

ATTACHMENT J TO ANSWERS TO INTERROGATORIES

Corrugated "400"

National Gypsum Company's Gold Bond Corrugated "400" was designed for use as siding and roofing material over skeleton construction in industrial buildings. The product was also known as "Corrugated Asbestone 400" and "Asbestone Corrugated."

Sheets were available in 42" widths and various standard and custom-cut lengths. The sheets were natural cement grey in color. Beginning in 1963, they were offered in various pre-finished colors as well.

Corrugated "400" was manufactured in New Orleans, Louisiana (approximately 1954-1981). Its asbestos content ranged from approximately 16.3%-22.5% chrysotile by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

Corrugated "400" was installed by bolting the sheets to framing, using clips and fasteners. Application of Corrugated "400" could be made only by contractors approved by National Gypsum Company. It was shipped stacked on wooden pallets and, in some cases, made rigid to the pallets with steel or plastic banding.

ATTACHMENT K TO ANSWERS TO INTERROGATORIES

Insul-Best Panels

Gold Bond Insul-Best panels were an asbestos-cement exterior siding product marketed by National Gypsum Company from 1958 to 1960. Insul-Best panels consisted of asbestos-cement siding shingles laminated to asphalt-impregnated insulation sheathing. The sheathing was asbestos-free. The panels were manufactured in two sizes and various colors. Nails were used to attach the panels to building studs. Each panel had pre-punched nail holes.

Insul-Best panels were manufactured at the New Orleans, Louisiana and Millington, New Jersey plants. The asbestos-cement portion of Insul-Best panels contained between approximately 12% and 21.7% chrysotile asbestos by weight. From 1959 until the product was discontinued, a small percentage of amosite may have been substituted for the same amount of chrysotile in some of the siding used on the panels, if needed to improve filtration or drainage during the manufacturing process.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum applied for, but did not register, a trademark for the name "Insul-Best." National Gypsum is not aware of any patents on this product.

Insul-Best panels were packaged face-to-face, eleven panels per bundle.

NATIONAL GYPSUM COMPANY

No asbestos caution notice was included with this product; National Gypsum was not aware of any possibility of injury from the use of Insul-Best panels that would have required such warning.

ATTACHMENT L TO ANSWERS TO INTERROGATORIES

Mortar Mix

National Gypsum Company's Gold Bond Mortar Mix was a grouting material sometimes used in the application of asbestos cement corrugated roofing and siding products. It was also known as "Asbestos Cement Mix" and "Special Mix Asbestos Cement."

Mortar Mix was sold from approximately 1954 until sometime in the early 1970's. It was manufactured in New Orleans, Louisiana, and contained approximately 10%-11.8% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, Mortar Mix may have contained a small percentage of amosite asbestos substituted for the same amount of chrysotile.

The product was mixed in the field. Mortar Mix was used to grout corner rolls, ridge rolls and eaves, or other places where fill is required.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum is not aware of any other trademarks or patents on this product.

Mortar Mix was packaged in dry form in 100 pound kraft bags, plainly labeled or marked with the product name.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

ATTACHMENT M TO ANSWERS TO INTERROGATORIES

Permaboard

Gold Bond Permaboard was the National Gypsum Company trade name for asbestos cement utility (Type U) flat sheet, designed for use in constructing exterior or interior walls, especially for farm, light industrial, or commercial buildings. Smaller sized boards were also sold as formboard for use in the construction of poured gypsum roof decks, although National Gypsum manufactured and sold other types of formboard that did not contain asbestos. It was intended for flat, rigid application only.

Permaboard was sold from approximately 1954 until 1981. It was manufactured in Millington, New Jersey (1956-1975); St. Louis, Missouri (1954-1971); and New Orleans, Louisiana (1954-1981). Permaboard contained between approximately 16.5%-22.2% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

Permaboard was available in various sizes. It was available in prefinished colors, as well as cement grey. Permaboard was applied with nails, screws, or adhesives to framing, studs, wood sheathing, insulating board, or gypsum sheathing. It was shipped stacked on pallets and banded in bundles

with steel or plastic strapping.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum also holds a trademark on the name "Permaboard." It is unaware of holding any patents on this product.

Asbestos caution notices were first included with Permaboard in 1973. See Caution Notice Attachment.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

ATTACHMENT N TO ANSWERS TO INTERROGATORIES

Pliaboard

Gold Bond Pliaboard was National Gypsum Company's name for an asbestos cement flexible (Type F) flat sheet designed for use in constructing exterior and interior walls in industrial, commercial, and farm structures. It could be used where curved applications were required.

Pliaboard was sold from approximately 1954 until 1960. It was manufactured in Millington, New Jersey (1956-1960); St. Louis, Missouri (approximately 1954-1960); and New Orleans, Louisiana (approximately 1954-1960). Pliaboard contained approximately 29.8% to 44.7% chrysotile asbestos by weight. From 1959 until the product was discontinued, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

Pliaboard was available in four foot widths and varying lengths. All sheets were 1/8" thick. Pliaboard was cement grey in color. It could be applied with nails, screws, or adhesives.

"Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum is not aware of holding any other trademarks or patents on this product.

Pliaboard was shipped in two-sheet bundles with steel or plastic strapping and stacked on pallets. Two-sheet units were bound with bundling tape.

No asbestos caution was included with Pliaboard;
National Gypsum was not aware of any possibility of injury from
the use of Pliaboard that would have required any such warning.

ATTACHMENT 0 TO ANSWERS TO INTERROGATORIES

Plia-F-lex

Gold Bond Plia-F-lex was the trade name for an asbestos cement flexible (Type F) flat sheet designed for use in constructing exterior and interior walls in industrial and commercial structures and where curved applications were required.

"Gold Bond" is a registered trademark of National Gypsum Company.

Plia-F-lex was sold from 1960 through March 1981. It was manufactured in Millington, New Jersey (1960-1975); St Louis, Missouri (1960-1971); and New Orleans, Louisiana (1960-1981). Plia-F-lex contained between 28%-30% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

Plia-F-lex was available in various sizes and could be applied with nails, screws, or adhesives. It was shipped stacked on pallets and banded with steel or plastic strapping.

Plia-F-lex asbestos cement flat sheets were also used as the base material for two prefinished panel products, Plasti-Clad and Plasticrylic, used primarily in curtainwall construction. The product names referred to the special finish applied to the flat sheets. The finish did not contain asbestos. Prefinished panels were available in various sizes and were utilized

with a metal framing system. Panels could also be applied over gypsum sheathing. Panels were shipped face-to-face, with a paper slip between panels to protect the panel finish from scuffing.

Asbestos caution notices were first included with Plia-F-flex and prefinished panels in 1973. See Caution Notice Attachment.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

ATTACHMENT ^P ___ TO ANSWERS TO INTERROGATORIES

Roofing Shingles

Gold Bond Dutch Lap shingles, Gold Bond Hexagonal shingles and Gold Bond Ranch Style shingles were asbestos cement roofing shingles intended for residential use.

Dutch Lap shingles were manufactured from approximately 1954 through 1968. Ranch Style shingles were manufactured from 1956 through 1968. Hexagonal Shingles were manufactured from approximately 1954 through 1965.

Roofing shingles were manufactured in New Orleans, Louisiana. The asbestos content of the shingles by weight was approximately 12.9% to 22.0% chrysotile asbestos. From 1959 until the product was discontinued, a small percentage of amosite may have been substituted for the same amount of chrysotile in some shingles, if needed to improve filtration or drainage during the manufacturing process.

The shingles could be applied on new roofing jobs or over old roofing shingles. In either case, each shingle was fastened with two nails. Roofing shingles came with prefabricated nail holes so that applicators did not need to drill the shingles before applying them. Ordinarily, little or no dust would be created during installation of these products. The shingles were packaged in bundles, which were secured with steel straps.

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No asbestos caution notice was included with roofing shingles; National Gypsum was not aware of any possibility of injury from the use of roofing shingles that would have required any such warning.

ATTACHMENT Q TO ANSWERS TO INTERROGATORIES

Soffit Panels

Soffit panels were asbestos cement perforated panels designed for installation under overhanging eaves.

Soffit panels were manufactured in New Orleans, Louisiana and sold from 1959 to 1981. The panels contained approximately 15.1% to 18.1% chrysotile asbestos by weight. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some panels, if needed to improve filtration or drainage during the manufacturing process.

Soffit panels were available in various sizes. They were installed by nailing to framing. They were shipped and packaged in corrugated boxes, with six or ten panels to a box.

Asbestos caution notices were first included with soffit panels in 1975. See Caution Notice Attachment.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

ATTACHMENT R TO ANSWERS TO INTERROGATORIES

Thermotec Sheets

Gold Bond Thermotec was National Gypsum Company's name for asbestos cement flat sheets sold to fabricators for use as laminates, substrates, and facings. Thermotec sheets had a "felt-smooth back" or "screened back" and were available in various surfaces. They came four feet wide and in a variety of lengths. Some sheets were available in pre-finished colors.

Thermotec was manufactured in New Orleans, Louisiana (approximately 1960-1981); St. Louis, Missouri (approximately 1960-1971); and Millington, New Jersey (approximately 1960-1975). Thermotec contained between 15.2% and 30% chrysotile asbestos by weight. From approximately 1960 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some sheets, if needed to improve filtration or drainage during the manufacturing process.

Thermotec was shipped on pallets and banded in bundles with steel or plastic tape.

"Gold Bond" and "Therm-O-Tec" are registered trademarks of National Gypsum Company. National Gypsum is not aware of holding any patents on this product.

Asbestos caution notices were first included with Thermotec in 1973. See Caution Notice Attachment.

This product was discontinued when National Gypsum sold its New Orleans plant and went out of the asbestos-cement products business.

ATTACHMENT S TO ANSWERS TO INTERROGATORIES

Woodrock

Gold Bond Woodrock was an asbestos cement product that was factory cut and sold as panels, battens, and clapboard siding.

Woodrock was manufactured in New Orleans, Louisiana (1963-1976) and St. Louis, Missouri (1969-1971). National Gypsum Company ceased marketing Woodrock siding in 1971, although it continued to market Woodrock panels until 1976. Asbestos fiber content by product weight was approximately 15%-23.6% chrysotile asbestos. From 1959 until sometime in the early 1970's, a small percentage of amosite may have been substituted for the same amount of chrysotile in some Woodrock products, if needed to improve filtration or drainage during the manufacturing process.

Woodrock panels were 4' wide and 3/8" thick and came in lengths of 8, 9, 10 and 12 feet. Panels were factory-primed. Woodrock clapboard was 3/8" thick and 12' long. It was available pre-primed in 6, 9 1/2, and 12 inch widths. The 12" width was available prefinished in a variety of colors beginning in 1969.

Woodrock siding could be used for new construction or for re-siding. Woodrock panels could be used as substrates for field-applied texture finishes or as siding using the board and

batten method. Both products could be attached with nails. Woodrock siding was packaged in cartons. Woodrock panels were strapped to pallets for shipping.

Asbestos caution notices were first included with Woodrock in 1973. See Caution Notice Attachment.

ATTACHMENT T TO ANSWERS TO INTERROGATORIES

Gold Bond Acoustical Plaster

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond or GB Acoustical Plaster was designed for trowel application on upper walls and ceilings. The acoustical plasters manufactured and sold by National Gypsum were generally white or off-white and sold in dry form. Small quantities of Gold Bond Acoustical Plaster were also available in various colors at different times.

Gold Bond Acoustical Plaster was machine mixed with clean water before application. The prepared plaster was applied in two coats, totalling 3/4 inch, over a standard base coat of gypsum plaster. It could then be worked into a trowel, float, or stipple finish.

National Gypsum Company manufactured Gold Bond Acoustical Plaster at its plants in Clarence Center, New York; Medicine Lodge, Kansas (1953-1958); and Fort Dodge, Iowa (1957-1959). National Gypsum sold Gold Bond Acoustical Plaster from approximately 1949 until 1962.

The percentage by weight of chrysotile asbestos in Gold Bond Acoustical Plaster varied between 9.8% and 9.9%. Asbestos was utilized in Gold Bond or GB Acoustical Plaster to improve workability and to provide strength and durability.

Gold Bond Acoustical Plaster was packaged in bags.

The asbestos used in the manufacture of Gold Bond Acoustical Plaster may have been supplied by Phillip Carey Manufacturing Company, The Ruberoid Company, Johns-Manville and National Asbestos Mines, Ltd.

National Gypsum was given Patents No. 2,485,259 (on October 18, 1949) and No. 2,933,147 (on April 19, 1960) in connection with general improvements for all its acoustical plasters, including Gold Bond Acoustical Plaster.

National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters, including Gold Bond Acoustical Plaster.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

Gold Bond Acoustical Plaster was discontinued because of the declining demand for the product and its low volume of sales.

ATTACHMENT U ANSWERS TO INTERROGATORIES

Block-fil

Gold Bond Block-fil was a latex product that was used on unpainted interior or exterior surfaces made of cement block, cinder block, concrete block, and porous poured concrete to fill voids and imperfections in the surfaces.

National Gypsum Company manufactured and sold Gold Bond Block-fil from 1959 until approximately 1968. Gold Bond Block-fil was supplied in both a dry and a ready-mixed version. Dry Block-fil was cream-colored, and ready-mixed was gray.

Ready-mixed and dry Gold Bond Block-fil were manufactured at National Gypsum's Matteson, Illinois, plant. Dry Gold Bond Block-fil was manufactured from 1963-1968 and ready-mixed Gold Bond Block-fil was manufactured from 1959-1968.

The percentage by weight of chrysotile asbestos in Gold Bond Block-fil varied between 3.9% and 10.1%.

The dry Gold Bond Block-fil was mixed with water prior to application. Both dry and ready-mixed were usually applied, in generous amounts, with a brush. However, they may also have been applied with a roller or spray machine. Paint could be applied to a Block-fil surface, and National Gypsum recommended that all such exterior surfaces be painted.

Dry Gold Bond Block-fil was available in bags. Ready-mixed Gold Bond Block-fil was available in cans. The following warning appeared on the cans:

ATTACHMENT V TO ANSWERS TO INTERROGATORIES

Cover Crete

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products primarily acoustical plasters, did contain asbestos.

Gold Bond Cover Crete was an interior finish plaster. It was designed for use over dry, smooth, unpainted concrete. National Gypsum manufactured and sold Gold Bond Cover Crete from approximately 1951 to 1965. "Gold Bond" is a registered trademark of National Gypsum Company.

Gold Bond Cover Crete was manufactured at National Gypsum's plant in Bronx, NY. The percentage by weight of chrysotile asbestos was 8.58%. The asbestos may have been supplied by Asbestos Corporation and Philip Carey. Asbestos was used in Cover Crete to improve workability and to provide strength and durability.

Surfaces over which Gold Bond Cover Crete was to be applied were first primed with Gold Bond Cover Crete Primer. The dry Gold Bond Cover Crete was added to clean water and mixed. Two coats of Gold Bond Cover Crete were then spread over the primed surface and finished with a trowel, wood float, or similar tool.

Gold Bond Cover Crete was packaged in dry form in paper bags.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

National Gypsum has been unable to determine why Gold Bond Cover Crete was discontinued.

ATTACHMENT W TO ANSWERS TO INTERROGATORIES

Craftco Cement Paint

National Gypsum Company manufactured and sold an asbestos formulation of Craftco Cement Paint, also known as Cement Paint, from 1938 through approximately 1952. Craftco Cement Paint was advertised as a low cost paint for stucco and masonry surfaces that were porous and absorbed water freely. A non-asbestos formulation was manufactured by National Gypsum from 1952 through 1968.

Craftco Cement Paint was supplied in a dry powder form for mixture with water. It was a water-repellant, decorative finish for exterior porous stucco, masonry walls and interior porous masonry walls above and below grade. It was suitable for use on cinder block, porous concrete, stucco, brick, unglazed tile or masonry walls. Craftco Cement Paint came in white, and was also available in a variety of colors. Craftco Cement Paint covered 20 square feet per pound on the first coat, and 25 square feet per pound on the second coat.

Prior to 1952, Craftco Cement Paint's formulation contained 0.5% to 1.0% chrysotile asbestos by weight. The supplier(s) of the asbestos is not known. It was manufactured at National Gypsum's plant in New York, New York.

Craftco Cement Paint was packaged in 5 pound canisters (or cartons depending on the dates), 10 canisters per case, as well as 25 pound and 100 pound drums. No cautions concerning asbestos were used on packages of this product, since National Gypsum was not aware of any hazard associated with use of this product.

National Gypsum ceased manufacturing the asbestos formulation of Craftco Cement Paint when it purchased Wesco Waterpaints, Inc. in 1952. National Gypsum's New York Plant stopped manufacturing paint products, and National Gypsum began to use Wesco's formulation for Craftco Cement Paint which did not contain asbestos.

ATTACHMENT X TO ANSWERS TO INTERROGATORIES

Exterior Stucco

Gold Bond Exterior Stucco was a Portland cement product designed for exterior use on expanded metal lath. It was available in various colors, including white, and was packaged in bags.

National Gypsum manufactured Gold Bond Exterior Stucco from approximately 1930 to 1949. "Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum manufactured Gold Bond Exterior Stucco at its plants in Luckey, Ohio and Rotan, Texas. As manufactured at Luckey, Ohio, it contained 0.26% by weight chrysotile asbestos. As manufactured in Rotan, Texas, it contained 0.15% by weight chrysotile asbestos. Asbestos was used in Gold Bond Exterior Stucco to improve workability and to provide strength and durability. It is unknown what company supplied the asbestos used in this product.

From the late 1940's until approximately 1971, this product was manufactured for National Gypsum by U.S. Gypsum. National Gypsum does not know the ingredients in the product manufactured by U.S. Gypsum, and in particular, does not know whether asbestos was an ingredient. National Gypsum discontinued selling the product because of a low level of profitability.

Gold Bond Exterior Stucco was packaged in bags. It was mixed with water and applied by spreading and finishing with a trowel, wood float, or similar tool.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages this product.

ATTACHMENT Y TO ANSWERS TO INTERROGATORIES

Fire-Shield Plaster

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond Fire-Shield Plaster was a brownish-gray spray plaster that was used primarily to provide a continuous, lightweight, fireproof coating for metal surfaces.

National Gypsum manufactured and sold Gold Bond Fire-Shield Plaster from 1959 until 1970. National Gypsum held a patent for Fire-Shield Plaster (U.S. Patent 3,369,929, received February 20, 1968, and Canadian Patent 772,211, received November 21, 1967). In January, 1970, National Gypsum Company entered into an agreement with W. R. Grace Co., Zonolite Division (now the Construction Products Division), under which Zonolite was given an exclusive license in the United States and a non-exclusive license in Canada to manufacture and sell a product utilizing Fire-Shield Plaster's formula. National Gypsum discontinued Gold Bond Fire-Shield Plaster because of declining demand for the product.

Gold Bond Fire-Shield Plaster was manufactured at National Gypsum's plants in Burlington, NJ, Clarence Center, NY, Fort Dodge, IA, Long Beach, CA, Medicine Lodge, KS, Savannah, GA, Shoals, IN, and Waukegan, IL from 1959 through 1970, as well as at Portsmouth, NH from 1968 through 1970 and at Tampa, FL, from 1964 through 1966.

Gold Bond Fire-Shield Plaster contained 12.6% chrysotile asbestos by weight until 1962 and 24.4% chrysotile asbestos by weight from 1962 until 1970. The asbestos fiber may have been supplied by Johns-Manville and National Asbestos Mines, Ltd. Asbestos was used in Fire-Shield for its qualities of strength, incombustibility, and "slip."

Gold Bond Fire-Shield Plaster was designed for machine spray application on steel surfaces (e.g., steel decking, flooring, and beams) that were free of dirt and grease. It was machine mixed after the addition of clean water.

Gold Bond Fire-Shield Plaster was packaged in dry form in bags. National Gypsum's tradename and registered trademark "Gold Bond" appeared across the top of the bags.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to the packages of this product.

ATTACHMENT Z TO ANSWERS TO INTERROGATORIES

High Humidity Acoustical Plaster

Most types of plasters manufactured by National Gypsum did not contain asbestos. However, a few plasters, primarily acoustical plasters, did contain asbestos.

Gold Bond High Humidity Acoustical Plaster was designed for trowel application on ceilings in areas of high humidity. This plaster came in dry form in oyster white. It may have also been labelled Gold Bond Type "C" Acoustical Plaster.

National Gypsum manufactured and sold Gold Bond High Humidity Acoustical Plaster from approximately 1952 to 1956. It was discontinued because of lack of demand for the product. Gold Bond High Humidity Acoustical Plaster was manufactured at National Gypsum's plant in Clarence Center, New York, and possibly at its plant in Medicine Lodge, Kansas.

Gold Bond High Humidity Acoustical Plaster contained 6.95% by weight chrysotile asbestos. The asbestos in Gold Bond High Humidity Acoustical Plaster may have been supplied by Johns-Manville. Asbestos was utilized in Gold Bond High Humidity Acoustical Plaster to improve workability and to provide strength and durability.

Gold Bond High Humidity Acoustical Plaster was packaged in bags. National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters.

Gold Bond High Humidity Acoustical Plaster, designed for float-finish application, was applied with a trowel over a thoroughly dry, cross-hatched basecoat of Portland cement, lime, and sand. National Gypsum recommended that Gold Bond High Humidity Plaster not be applied in areas subject to rough use and that three separate coats of plaster, totalling three-quarters of an inch, be applied. The finished surface could then be spray painted.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

National Gypsum was given Patent No. 2,485,259 (on October 18, 1949) in connection with general improvements for all its acoustical plasters, including Gold Bond High Humidity Acoustical Plaster.

ATTACHMENT AA TO ANSWERS TO INTERROGATORIES

Joint Treatment Materials

Joint treatment materials were applied with a broad knife to fill in and to conceal the seams between pieces of wallboard or drywall, to conceal nailheads in gypsum wallboard or drywall, and, sometimes, to laminate wallboard or drywall to an existing wall or ceiling surface.

National Gypsum has used the following tradenames at various times on its joint treatment materials: Gold Bond Joint Cement, Gold Bond Crown Coat Cement, Gold Bond All-Purpose Joint Cement, Gold Bond All-Purpose Joint Compound, Gold Bond Tri-Treatment Joint Cement, Gold Bond Tri-Treatment Joint Compound, Gold Bond Finisher, Gold Bond Joint Compound, Wesco Joint Treatment, Gold Bond Quick-Treat Joint Compound, Gold Bond Triple T Compound, Gold Bond Sta-Smooth Compound, Gold Bond Velvet Joint Compound, Gold Bond Two-In-One Compound, Gold Bond Thermo-Weld Compound, Gold Bond Quick-Weld or Q-W Compound, Gold Bond Ready Mixed Joint Cement, Gold Bond Ready Mixed Joint Compound, Gold Bond Topping Cement, Gold Bond Topping Compound, Gold Bond Velvet Topping Compound, Gold Bond Ready Mixed Compound, Gold Bond Vinyl Topping Compound and Gold Bond "D2" Topping Compound.

Gold Bond is a registered National Gypsum trademark. In addition, National Gypsum registered the following three trademarks for joint treatment materials: "Quik-Treat" (June 24, 1963), "Triple T" (October 29, 1965), and "Q/W" (January 22, 1973).

SECRET

National Gypsum was given Patent Nos. 2,523,646 (on September 26, 1950), 3,303,147 (on February 7, 1967), 3,808,017 (on April 30, 1974), and 3,984,269 (on October 5, 1976) in connection with general improvements for joint treatment materials. National Gypsum was given Patent No. 3,907,725 (on September 23, 1975) for an asbestos-free joint compound.

Dry joint treatment materials containing asbestos were manufactured by National Gypsum from approximately 1935 until late 1975. Ready-mixed joint treatment materials containing asbestos were manufactured from the 1950's until late 1975. Sales of joint treatment materials containing asbestos may have continued into 1976. Joint treatment materials manufactured by National Gypsum after 1975 did not contain asbestos.

Joint treatment materials were manufactured by National Gypsum Company in the following locations: Baltimore, Maryland; Berkeley, California; Bronx, New York; Good Hope, Louisiana; Long Beach, California; Luckey, Ohio; Matteson, Illinois; Raritan, New Jersey; Rotan, Texas; Trenton, New Jersey; Westwego, Louisiana.

The asbestos content of joint treatment products varied for different formulations. For ready mixed products, the percentage by weight of chrysotile asbestos varied between 0.9% and 10.9%. For other types of joint treatment products, the percentage by weight of chrysotile asbestos generally was between 1.1% and 23.1%, although a few formulations provided for asbestos content as high as 45.2%.

National Gypsum also purchased joint treatment material, containing asbestos, for resale from: Hatcher Lumber Company, Phoenix, Arizona (1962-1969); Ruco Company, Kansas City, Missouri (1972-1976); and Monarch Paint Company, Houston, Texas (1973-1976).

Into the 1960's, National Gypsum used grade 7RF and 7T asbestos fibers purchased primarily from Johns-Manville, Asbestos Corporation Limited, and National Asbestos Mines, Ltd., in its joint treatment materials. In approximately 1967, National Gypsum also began to use Union Carbide SG-210 fiber. Asbestos was utilized in Gold Bond joint treatment materials generally to improve workability and to provide strength and durability.

Gold Bond joint treatment materials were packaged in bags, boxes, cans, and pails.

National Gypsum began affixing asbestos "Caution" labels to its packages of dry joint treatment materials in mid-1972 and to its containers of ready-mixed joint treatment in late 1973 or early 1974. The notice read as follows:

"CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May
Cause Serious Bodily Harm"

Beginning in late 1973 or early 1974, National Gypsum added the following dust caution labels to its packages of joint

treatment materials. These dust caution labels were used together with the above asbestos caution label.

The dust caution label for dry joint treatment read:

"CAUTION

When mixing and/or dry sanding this product wear eye protection and a respirator which is U.S. Bureau of Mines approved for Toxic, Nuisance and Pneumoconiosis producing dusts. Wet sanding or sponging is recommended."

The dust caution label for ready-mixed joint treatment read:

"CAUTION

When dry sanding this product wear eye protection and a respirator which is U.S. Bureau of Mines approved for Toxic, Nuisance and Pneumoconiosis producing dusts. Wet sanding or sponging is recommended."

National Gypsum believes that the language of the warnings did not change after 1974, when "NIOSH" was substituted for "U.S. Bureau of Mines." Warnings were included pursuant to OSHA regulations and recommendations.

SECRET

In addition to warnings supplied with its joint treatment products, National Gypsum sent a letter dated November 1, 1974, to some customers advising them of the new OSHA regulations concerning the handling of asbestos-containing materials. National Gypsum cannot now identify the recipients of this letter. In addition, beginning in the early 1970's, National Gypsum may have provided information concerning possible hazards of asbestos in response to individual requests.

ATTACHMENT BB TO ANSWERS TO INTERROGATORIES

Laminating Adhesive

Gold Bond MC Adhesive, Gold Bond Laminating Adhesive and Gold Bond Laminating Adhesive A were used to glue together two or more layers of gypsum wallboard to help form a sturdier wall.

National Gypsum Company manufactured and sold Gold Bond Laminating Adhesive containing asbestos from 1953 until 1956. It was off-white. National Gypsum manufactured and sold Gold Bond Laminating Adhesive A containing asbestos from 1970 through 1974. (National Gypsum also manufactured and sold Gold Bond Laminating Adhesive A without asbestos from 1961 to 1970.) It is unknown when Gold Bond MC Adhesive was manufactured. National Gypsum purchased asbestos-containing Gold Bond MC Adhesive from the Durabond Products Company, a subsidiary of United States Gypsum.

Gold Bond Laminating Adhesive was manufactured at National Gypsum Company's plants in Good Hope, LA; Matteson, IL; Rotan, TX and Trenton, NJ. It contained 5.8% by weight chrysotile asbestos. Gold Bond Laminating Adhesive A containing asbestos was manufactured at National Gypsum's plant in Matteson, IL, and possibly Raritan, NJ. It contained 15% by weight chrysotile asbestos. Gold Bond MC Adhesive contained chrysotile asbestos. Asbestos was utilized in Gold Bond Laminating Adhesive and Adhesive A to strengthen the bond and to control slip during application.

Gold Bond Laminating Adhesive and Gold Bond Laminating Adhesive A were sold in bags. Gold Bond MC Adhesive was sold in cartridges. "Gold Bond" is a registered trademark of National Gypsum Company.

National Gypsum was not placing asbestos warnings on its products during the marketing period for Gold Bond Laminating Adhesive. It is unknown if any warnings were placed on containers of Gold Bond MC Adhesive. In January, 1974, National Gypsum began using the following dust caution label on its packages of Laminating Adhesive A:

CAUTION

When mixing this product wear eye protection and a respirator which is U.S. Bureau of Mines approved for toxic, nuisance and pneumoconiosis-producing dusts.

It is unknown why Gold Bond Laminating Adhesive and Gold Bond Laminating Adhesive A were discontinued. Gold Bond MC Adhesive containing asbestos was replaced with a non-asbestos formulation of the same product.

ATTACHMENT CC TO ANSWERS TO INTERROGATORIES

Latex Texture Paints

National Gypsum manufactured and sold a number of paint products, most of which did not contain asbestos.

National Gypsum Company sold Gold Bond Latex Texture Paints from 1957 until 1968. National Gypsum has been able to identify only two of its plants that manufactured these paints: the Berkeley, California and Los Angeles, California plants. The paints were discontinued because National Gypsum ceased manufacturing and selling paints.

The chrysotile asbestos content of Gold Bond Latex Texture Paints varied between 3.1% and 10.4% by weight. Asbestos was utilized in Gold Bond Latex Texture Paints for its qualities of water resistance and nonflammability.

Gold Bond Latex Texture Paints were packaged in metal cans.

Gold Bond Latex Texture Paints were applied with rollers to interior walls or ceilings. They were available in eleven colors ranging from white to shades of blue. No dry mixing was required, since the paint was supplied in liquid form.

The trade names of the latex texture paints included Gold Bond Latex Stipple and Gold Bond Latex Texture. "Gold Bond" is a registered trademark of National Gypsum Company.

National Gypsum believes that no cautions or warnings pertaining to asbestos were affixed to containers of this product. National Gypsum was not aware of any possibility of injury from the use of this product that would have required any such warning.

National Gypsum was given Patent No. 2,758,034 on August 7, 1956, for an improvement in casein mix, casein being a base ingredient of texture paints. It was also given Patent No. 1,984,116 on December 11, 1934, for plastic paint that dried to a textured finish.

ATTACHMENT DD TO ANSWERS TO INTERROGATORIES

Macoustic

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond Macoustic was a mineral-based acoustical plaster containing asbestos. It was used primarily for its acoustical properties and to provide a uniform ceiling surface.

Gold Bond Macoustic was supplied in several forms: 47-W Base Coat, 47-W Top Coat, Standard (for a texture finish), and Smooth Finish (for a troweled or float finish). It came in five tints: Natural, Ivory, Cream, Buff, and Caenstone.

National Gypsum began the manufacture and sale of Gold Bond Macoustic in 1933, when it purchased the assets (including patents and the Macoustic trademark) of the Macoustic Engineering Company, Inc. It continued to market Gold Bond Macoustic until 1949, when the product was replaced by Gold Bond Acoustical Plaster. Gold Bond Macoustic was manufactured at National Gypsum plants in Bronx, New York, Clarence Center, New York, Rotan, Texas, and possibly Akron, New York.

The composition of Gold Bond Macoustic changed from time to time during the period of its manufacture. Asbestos was utilized in Gold Bond Macoustic to improve workability and to provide strength and durability. The percentage by weight of chrysotile asbestos varied between 4.0% and 39.9%.

Gold Bond Macoustic was made with asbestos fiber that may have been purchased from Asbestos Corporation, Ltd., Philip Carey, and Vermont Asbestos. Grades 7RF and 2C were primarily used because of their desirable water retention qualities.

Gold Bond Macoustic was applied as follows: a base coat of gypsum plaster was applied or "scratched in"; then the Gold Bond Macoustic (supplied in dry form) was mixed with clean water and usually two coats (totalling 1/2" in thickness) were applied with a trowel.

Gold Bond Macoustic was used on flat or curved ceiling surfaces. Only Gold Bond Smooth Finish Macoustic was intended for use in high humidity areas (with a base coat of Portland cement, lime, and sand).

Gold Bond Macoustic was packaged in bags. National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters. National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

Panelectric Groove Fill

Gold Bond Panelectric Groove Fill was a plaster product used to embed electrical wiring in Gold Bond Panelectric ceiling panels. The Groove Fill was not sold except as a constituent part of Gold Bond Panelectric panels. The panels themselves did not contain asbestos. "Gold Bond" is a registered trademark of National Gypsum Company.

National Gypsum Company manufactured and sold Gold Bond Panelectric panels with asbestos-containing Groove Fill from approximately 1969 to 1972; in mid-1972, asbestos was removed from the Groove Fill formula.

Gold Bond Panelectric panels with asbestos-containing Groove Fill were manufactured at National Gypsum plants in Clarence Center, N.Y., and Akron, N.Y.

The percentage by weight of asbestos in Gold Bond Panelectric Groove Fill was 5.0%.

National Gypsum believes that no cautions or warnings pertaining to asbestos were affixed to the finished panels. National Gypsum recommended that its Gold Bond Panelectric panels not be cut in the course of application and the panels were available in several sizes for the purpose of eliminating any need to cut them. Consequently, little or no dust would have been created during installation of this product.

ATTACHMENT FF ANSWERS TO INTERROGATORIES

Patching Plaster

Gold Bond Patching Plaster was used to repair large cracks and holes in plaster. It was available in white only.

Gold Bond Patching Plaster containing asbestos was manufactured at National Gypsum's plants in Bronx, New York, Rotan, Texas, Ft. Dodge, Iowa, Savannah, Georgia, National City, Michigan, Clarence Center, New York, and Portsmouth, New Hampshire. "Gold Bond" is a registered trademark of National Gypsum Company. National Gypsum believes that Gold Bond Patching Plaster was manufactured from approximately 1936-1969. The last sales of Gold Bond Patching Plaster were in 1970.

The percentage by weight of chrysotile asbestos fibers used in Patching Plaster varied between 1% and 2.5%. The asbestos used in this product may have been supplied by Asbestos Corporation of America and Philip D. Carey Company. Asbestos was utilized in Patching Plaster to improve workability and to provide strength and durability.

Gold Bond Patching Plaster was mixed with clean water prior to application. It would then be applied with a trowel to plaster surfaces that had been undercut.

Gold Bond Patching Plaster was packaged in bags. National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

ATTACHMENT GC TO ANSWERS TO INTERROGATORIES

Perfo-Lyte

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond Perfo-Lyte (or Perfolite) was a sound absorbing, decorative acoustical plaster designed for trowel application over properly prepared interior curved or flat surfaces. It was naturally white and could be applied in areas of high humidity, but National Gypsum recommended that it not be applied in areas subject to rough use or over radiant heating panels.

Gold Bond Perfo-Lyte was manufactured at National Gypsum's Gibsonburg, Ohio, plant from approximately 1955 until 1972. National Gypsum ceased manufacturing the product because of a decline in demand for it.

Gold Bond Perfo-Lyte contained 9.9% by weight chrysotile asbestos.

Asbestos was used in Gold Bond Perfo-Lyte for its properties of strength, durability, incombustibility and to provide "slip" under the trowel during application and leveling. Approved suppliers of asbestos fiber included Johns-Manville Company Ltd., Asbestos Corporation Ltd., Johnson Company Ltd., and National Asbestos Mines Ltd.

Gold Bond Perfo-Lyte was applied to a gypsum basecoat or over concrete or to a base called "Plaster Weld" (manufactured

by Larsen Products Corporation, Bethesda, Maryland). Prior to its application, Perfo-Lyte was machine mixed with clean water. It was applied with a trowel in two coats to a thickness of 1/2". The surface was stippled and uniformly perforated after it had dried.

Gold Bond Perfo-Lyte was packaged in bags. National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters. National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

National Gypsum was given Patents No. 2,485,259 (on October 18, 1949) and No. 2,933,147 (on April 19, 1960) in connection with general improvements for all its acoustical plasters, including Perfo-Lyte.

ATTACHMENT HH TO ANSWERS TO INTERROGATORIES

Rockwall Acoustic Plaster

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond Rockwall Acoustic Plaster was a gypsum based, quick setting, hard acoustical plaster. It was supplied in gray, and light and dark buff.

National Gypsum Company manufactured and sold Gold Bond Rockwall Acoustic Plaster from 1936, when it acquired Atlantic Gypsum Company, through 1940. It is unknown why this product was discontinued. "Gold Bond" is a registered trademark of National Gypsum Company.

Gold Bond Rockwall Acoustic Plaster was manufactured at National Gypsum's plant in Bronx, N.Y., and possibly at its plant in Portsmouth, N.H.

The percentage by weight of asbestos fiber in the product was 6.38%. The type of asbestos used and the company that supplied the asbestos are unknown.

Dry Gold Bond Rockwall Acoustic Plaster was mixed with clean water prior to application. It was applied with a trowel in two coats to a thickness of 1/2 inch to 3/4 inch. Asbestos was utilized in Gold Bond Rockwall Acoustic Plaster to improve workability and to provide strength and durability.

ATTACHMENT II TO ANSWERS TO INTERROGATORIES

Gold Bond Spackling Compound

Gold Bond Spackling Compound was used prior to painting or wallpapering for filling, patching and correcting small defects in almost any interior surface, including plaster, wallboard, wood, masonry and metal. It was also recommended for use as a Swedish putty. Gold Bond Spackling Compound was not recommended for "bedding" perforated tape, filling wallboard joints or repairing deep wide (1/8" or more) cracks.

Gold Bond Spackling Compound was manufactured without asbestos from approximately 1942 to approximately 1962. In addition, National Gypsum Company may have manufactured and sold Gold Bond Spackling Compound containing asbestos from late 1951 to 1953. If the asbestos formulation was used, it appears to have been produced concurrently with the non-asbestos formulation. If Gold Bond Spackling Compound containing asbestos was manufactured, it was at National Gypsum's plant in New York, New York. "Gold Bond" is a registered trademark of National Gypsum Company. Gold Bond Spackling Compound's asbestos formulation called for 0.86% asbestos by weight.

Gold Bond Spackling Compound was sold in dry powder form. It was mixed with water and took 4-6 hours to set. It dried to a hard white surface. It was packaged in bags, cartons and cans. National Gypsum was not aware of any hazard associated with the use of this product, and National Gypsum

believes that no cautions or warnings pertaining to asbestos were affixed to packages of this product.

National Gypsum was given Patent No. 2,523,646 (on September 26, 1950) for a composition for the correction of surface irregularities, which may have been used for Spackling Compound.

Gold Bond Spackling Paste

Gold Bond Spackling Paste was a ready-mixed soft paste used prior to painting or wallpapering for the resurfacing and patching of interior wall and ceiling surfaces including plaster, canvas, wood, wallboard, masonry, wallpaper, metal and especially concrete. It was packaged in one gallon metal cans and did not require dry mixing. It was applied to surface defects, form marks, small holes and other rough spots with a putty knife, and was an off-white color.

National Gypsum Company manufactured and sold Gold Bond Spackling Paste containing asbestos from 1962 to 1966. Gold Bond Spackling Paste manufactured from approximately 1952 to 1961 and from 1967 to 1968 did not contain asbestos. Gold Bond Spackling Paste was manufactured at National Gypsum's plants in Matteson, IL; Trenton, NJ; Good Hope, LA; Berkeley, CA and Raritan, NJ. "Gold Bond" is a registered trademark of National Gypsum Company.

The asbestos formulation of Gold Bond Spackling Paste contained 3.4% by weight chrysotile asbestos. Asbestos was utilized in Gold Bond Spackling Paste to improve workability and to provide strength and durability.

National Gypsum was not aware of any hazard associated with the use of this product, and National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

ATTACHMENT KK TO ANSWERS TO INTERROGATORIES

Sprayolite

Most types of plaster manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products, primarily acoustical plasters, did contain asbestos.

Gold Bond Sprayolite was a sound absorbing acoustical plaster that could be machine sprayed or troweled onto suitable ceiling surfaces. Gold Bond Sprayolite was available in Super White and Natural White. Small quantities of Gold Bond Sprayolite were also available in various colors at different times. It was sold in dry form. Gold Bond Sprayolite was machine mixed with clean water and applied in one or two coats with a trowel or spray machine. A final coat was usually applied by spraying to a total thickness of 1/2 inch.

Gold Bond Sprayolite contained approximately 19.3% by weight chrysotile asbestos from 1956 to early 1958. In early 1958, the product was reformulated and it contained between 6.9% and 9.4% by weight chrysotile asbestos, until it was discontinued. Asbestos was utilized in Sprayolite for its qualities of strength, incombustibility, water retention and "slip."

National Gypsum Company manufactured Gold Bond Sprayolite from approximately 1956 until 1972. Gold Bond Sprayolite was packaged in bags. It was manufactured at National Gypsum's plants in Clarence Center, New York, Medicine Lodge,

Kansas, and Fort Dodge, Iowa until 1958. After that date, it was manufactured only at the Clarence Center.

The asbestos used in the manufacture of Gold Bond Sprayolite may have been supplied by Johns-Manville and National Asbestos Mines, Ltd.

National Gypsum was given patents No. 2,485,259 (on October 18, 1949) and No. 2,933,147 (on April 19, 1960) in connection with general improvements for all its acoustical plasters, including Gold Bond Sprayolite.

National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

Gold Bond Sprayolite was discontinued because of a decline in demand for acoustical plaster. The declining market for acoustical plaster did not justify the reformulation of the product without asbestos which would have been required by government regulations concerning asbestos-containing spray products.

ATTACHMENT LL TO ANSWERS TO INTERROGATORIES

Spray-On Acoustical Plaster

Most types of plasters manufactured and sold by National Gypsum did not contain asbestos. However, a few plaster products primarily acoustical plasters, did contain asbestos.

Gold Bond Spray-On Acoustical Plaster was designed for machine application on ceilings where a continuous, sound absorbing, decorative finish was desired. It was available in two colors, white and natural.

Gold Bond Spray-On Acoustical Plaster was manufactured and sold by National Gypsum from approximately 1955 to 1956, when it was replaced by Gold Bond Sprayolite. It was manufactured at National Gypsum Company's plants in Clarence Center, New York, and Medicine Lodge, Kansas.

The percentage by weight of chrysotile asbestos in Gold Bond Spray-On Acoustical Plaster was 7.6% or 19.3%. Asbestos was used in Gold Bond Spray-On Acoustical Plaster for its qualities of strength, durability, and "slip." The 7RF asbestos fibers used in this product may have been supplied by Johns-Manville.

Gold Bond Spray-On Acoustical Plaster was packaged in bags. The name of the product, its weight, and color appeared on the face of the bag. Mixing and application instructions were printed on the reverse side. National Gypsum's tradename and registered trademark "Gold Bond" was usually imprinted on bags of its acoustical plasters.

Gold Bond spray textures were manufactured at National Gypsum plants in Good Hope, LA, Matteson, IL, Raritan, NJ, and Long Beach, CA, Los Angeles, CA, and possibly Rotan, TX.

The percentage by weight of chrysotile asbestos in spray textures varied between 1.8% and 14.94%. The asbestos may have been supplied by National Asbestos Mines, Ltd., Philip Carey, Union Carbide, Johns-Manville, or Asbestos Corporation Limited. National Gypsum included asbestos in the manufacture of Gold Bond spray textures to improve their application properties.

Gold Bond spray textures were mixed with clean water and then placed in suitable spray machines for application to clean, interior drywall surfaces.

Gold Bond Spray Textures were packaged in bags. Beginning in mid-1972, National Gypsum Company affixed asbestos "Caution" labels on packages of spray textures that contained asbestos. The notice read as follows:

CAUTION
Contains Asbestos Fibers.
Avoid Creating Dust.
Breathing Asbestos Dust May
Cause Serious Bodily Harm.

Prior to 1975, NGC affixed the following dust caution label to all packages of its spray textures, including packages of spray textures that did not contain asbestos:

CAUTION

When mixing and/or spraying
the product wear eye protection
and a respirator which is NIOSH
approved for Toxic, Nuisance and
Pneumoconiosis-producing dusts.

ATTACHMENT 00 TO ANSWERS TO INTERROGATORIES

Thermacooustic

Thermacooustic was a rock wool spray product containing asbestos. It was used as an acoustical material and fire protective agent, and also provided thermal insulation for surfaces such as ceilings. Thermacooustic was gray in color, but could be painted in any desired color. It was sold in dry form and packaged in bags.

Thermacooustic was sold by Gold Bond Building Products from 1949 until 1963. "Gold Bond" is a registered trademark of National Gypsum Company. Thermacooustic was withdrawn from the market due to the low volume of sales. A substitute product was not developed. Certain manufacturing equipment, surplus raw materials, and the right to participate in the Underwriters Laboratories Rating were sold in 1963 to Sealtite Insulation Manufacturing Corporation.

National Gypsum manufactured Thermacooustic at its plant in Alexandria, Indiana. At various times the grades of amosite asbestos used in Thermacooustic were: Union Asbestos and Rubber Co. No. 600, North American Asbestos Type AW (fiber length - 3/8"), and Johns-Manville AX2513 (fiber length 1/2"). The percentage of amosite asbestos fiber in Thermacooustic varied between 11.98% and 21.16%. The strength and fiber length of the asbestos bound the matrix of Thermacooustic. Asbestos was used in the product for its properties of strength, durability and incombustibility.

All surfaces over which Thermacoustic was to be applied, except metal lath, were to be primed with Gold Bond Thermacoustic Primer. Thermacoustic was sold to and applied by approved applicators only, who rented or purchased the special spray machines used in the application process. During application, the dry material travelled through one hose, the water through another hose, and the two were mixed at the nozzle of the spray gun. Thermacoustic was sprayed over the primed surface in either two or three coats, depending on the type of finish desired. Wood or cork floats were used to tamp the sprayed material. Thermacoustic was not intended to be applied directly to wood or other surfaces with a tendency to warp. It was not intended to be applied where it might be exposed to excessive condensation. It was not intended to be applied on walls below seven feet above floor level.

National Gypsum was given Patent No. 1,946,914 (on February 3, 1934) for a sound absorbing and insulating composition that may have been used for Thermacoustic.

National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product. However, the research division product supplement that provided customers with information about this product did state that workers applying the product should be provided with dust masks.

ATTACHMENT PP TO ANSWERS TO INTERROGATORIES
Unfibered (Extra Fibered, Fibered, Short Fibered)
Plasters for Spray Machines

Gold Bond Unfibered Plaster for Spray Machines was an off-white basecoat plaster designed for interior use. Gold Bond Fibered, Extra Fibered, and Short Fibered Plasters for Spray Machines were slight modifications of the Gold Bond Unfibered Plaster for Spray Machines formula.

Gold Bond Unfibered (Fibered, Short Fibered, Extra Fibered) Plaster For Spray Machines was manufactured at National Gypsum's plants in Clarence Center, New York; National City, Michigan; Fort Dodge, Iowa; Medicine Lodge, Kansas; Rotan, Texas; Shoals, Indiana; Waukegan, Illinois; Lorain, Ohio; Burlington, New Jersey; Portsmouth, New Hampshire; New Haven, Connecticut; Bronx, New York; Baltimore, Maryland; Savannah, Georgia; Long Beach, California; Tampa, Florida; and Westwego, Louisiana.

None of the various formulas contained asbestos except at Westwego, Louisiana, where, from 1966 to January 1969 only, some of the production may have contained up to 0.74%, less than 3/4 of 1%, chrysotile asbestos by weight. Westwego's normal shipping area included the states of Louisiana and Mississippi, as well as Eastern Texas, Southern Arkansas, and Western Alabama. National Gypsum ceased using any asbestos in the product in January 1969 because of the discontinuance of plaster manufacture at the Westwego Plant.

Gold Bond Unfibered (Fibered, Short Fibered, Extra Fibered) Plaster for Spray Machines was applied with a spray machine after mixing with water to the proper consistency.

Gold Bond Unfibered (Fibered, Short Fibered, Extra Fibered) Plaster for Spray Machines was packaged in bags. National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to the packages. The asbestos used in this product may have been supplied by National Asbestos Mines, Ltd.

ATTACHMENT QQ TO ANSWERS TO INTERROGATORIES

Wood Fibered Plaster, 10 pound packages

National Gypsum manufactured two different products under the name Gold Bond Wood Fibered Plaster. As sold in full size bags for general use, Gold Bond Wood Fibered Plaster did not contain asbestos. However, Gold Bond Wood Fibered Plaster-10 lb. package was a different product with a different formulation, and did contain a small percentage of asbestos. Gold Bond Wood Fibered Plaster, 10 lb. package, was an off-white plaster used for the alteration and repair of plaster surfaces. It was applied by spreading with a trowel, spatula, or similar tool.

National Gypsum manufactured and sold Gold Bond Wood Fibered Plaster, 10 lb. package, from approximately 1934 until 1971. In 1971, Gold Bond Wood Fibered Plaster, 10 lb. package, was withdrawn from the market because of decreased demand. "Gold Bond" is a registered trademark of National Gypsum Company.

Gold Bond Wood Fibered Plaster, 10 lb. package, was manufactured at various times at National Gypsum facilities in Akron, NY, Bronx, NY, Clarence Center, NY, Fort Dodge, IA, Medicine Lodge, KS, National City, MI, Portsmouth, NH, Rotan, TX, and Savannah, GA, and possibly in Burlington, NJ, Lorain, OH, Shoals, IN and Saltville, VA.

Gold Bond Wood Fibered Plaster, 10 lb. package, contained between .5% and .7% by weight chrysotile asbestos. National Gypsum has not been able to identify the suppliers of

asbestos used in this product. Asbestos was utilized in this product to improve workability and to provide strength and durability. Gold Bond Wood Fibered Plaster as sold in larger packages did not contain asbestos.

Gold Bond Wood Fibered Plaster, 10 lb. package, was packed in dry form in paper bags.

National Gypsum was not aware of any hazard associated with the use of this product, and National Gypsum believes that no cautions or warnings pertaining to dust or asbestos were affixed to packages of this product.

ATTACHMENT RR TO ANSWERS TO INTERROGATORIES

Asbestos Jackets for Pipe Covering

A National Gypsum brochure for Gold Bond Gimco Rock Wool Industrial Insulation, prepared about 1943, offers 35 lb. asbestos roofing paper jackets for sale in connection with certain styles of felted rock wool pipe covering. Prior to 1941, this product was offered for sale by General Insulating and Manufacturing Company (GIMCO), Alexandria, Indiana. National Gypsum does not know the source of this product, its composition or color, its asbestos content or type, how it was packaged, or whether it was patented. National Gypsum is not aware of any records regarding the design of this product. National Gypsum is not aware of any instructions for use or that a warning was placed on this product and was not aware of any possibility of injury from the use of asbestos roofing jackets that would have required any such warning. Sales literature would have been prepared by the marketing department and certain material may have been approved by the research department. The rock wool pipe coverings with which this product was used are believed to have been discontinued during World War II.

ATTACHMENT SS TO ANSWERS TO INTERROGATORIES

Rock Wool (340) Insulating Cement

Gold Bond rock wool insulating cement, sometimes sold as Gold Bond No. 340 Insulating Cement, was intended for use as a scratch or finish coat over Gold Bond Flexfelt mineral wool blankets and pipe coverings or as a monolithic primary insulating coat on irregular surfaces such as valves or fittings.

Rock wool insulating cement was manufactured by National Gypsum at its Alexandria, Indiana plant from 1941 until 1957. It was also sold from National Gypsum's Dover, New Jersey, plant from 1941 until 1943. Prior to March, 1941, General Insulating and Manufacturing Company (GIMCO) manufactured rock wool insulating cement at the Alexandria Plant. During World War II, National Gypsum revised the formula for this product in order to satisfy United States Navy specifications. A revised formulation was approved for use by the Bureau of Ships in 1943. Further revision to improve the work value was required, however, and a second revised formulation, designated internally as 340-N, was approved by the Bureau of Ships in 1944, and the prior approval was cancelled. The 340-N formulation was discontinued by 1946. Rock wool insulating cement was withdrawn from the market in 1957 because of poor market acceptance and because rock wool manufactured by new techniques was not suitable for use in cement.

This product was composed of rock wool, bentonite, clay, asbestos, sodium nitrite, sodium perborate or sodium silicate, and a wetting agent. After 1943, the asbestos content was approximately 10% by weight of product. The asbestos content before 1943 has not been established but available records indicate that the amount may have been less than 10% by weight. The 340-N formulation, which contained trisodium phosphate as well as sodium nitrite, was made under a non-exclusive patent license (U.S. Patent No. 2,237,745) granted by Eagle Picher Company.

At certain times, the asbestos used in this product was obtained from Southern Asbestos Company, Charlotte, North Carolina, and the fibers were approximately 3/8" to 3/4" in length, Grade 2. National Gypsum has no basis to believe that warnings accompanied the asbestos fiber supplied by Southern Asbestos Company.

Rock wool insulating cement was sold in a dry form in 50-lb. bags. At one time National Gypsum products were typically packaged in tan paper bags with National Gypsum's registered trademark "Gold Bond" in black and, below that, the name of the product in white on a black band. The bag had three cream-colored stripes at the top and two at the bottom. For a brief period during World War II burlap bags may have been used. After about November 21, 1955, rock wool insulating cement may have been packaged in 50-lb. bags, 24" by 44", of 3 ply natural kraft paper with an orange and black Gold Bond design. The

insulating cement was mixed with water in a suitable container and applied with a trowel or hands. Instructions for use of the product were printed in a brochure entitled "Gold Bond (340 Monolithic) Insulating Cement." No reference to warnings to users is contained in the instructions; National Gypsum was not aware of any possibility of injury from the use of No. 340 rock wool insulating cement that would have required any such warning. After application, rock wool insulating cement had a grey cement-like appearance.

Rock wool insulating cement was described in Gold Bond annual handbooks. Brochures were available from National Gypsum in Buffalo, New York, and in 1949 advertisements were placed in Petroleum Processing, Power and in Chemical Industries. In addition, advertisements for rock wool insulating cement appeared in Sweet's File - Architectural until 1954.

ATTACHMENT TT TO ANSWERS TO INTERROGATORIES

Asbestos-Faced Mineral Wool Board/Asbestos Stripping Tape

Gold Bond Asbestos-Faced Mineral Wool Board was intended for use as marine insulation. "Gold Bond" is a registered trademark of National Gypsum Company. It was manufactured by National Gypsum at its Alexandria, Indiana, plant in 1944 and 1945, and was designed to satisfy specifications of the Bureau of Ships of the United States Navy.

The product consisted of a rigid block of compressed rock wool which was faced with asbestos paper, scrim side to the wool, in accordance with Bureau of Ships specifications. The paper facing, the only part of the product containing asbestos, was Grade No. 112 asbestos paper supplied by Keasbey & Mattison Company. The chemical composition of this paper and the type of asbestos used are not known. It is believed that Keasbey and Mattison did not accompany this asbestos paper with any warnings or directions. When applied, the facing did not extend over the edge of the mineral wool at any point. It was bonded to the block with Cascanite adhesive. The product was fabricated to the thickness, width, and length specified in the order; standard dimensions appear to have been 24" by 36", and 1", 1 1/2" or 2" in thickness.

The finished product was packaged in cartons stamped to show the type, size, quantity of contents and the time and place

approved Natcor Sheathing in certain thicknesses as "acceptable" as incombustible material for use as ceiling or lining material on ships. In 1945, these agencies gave the same approval to 3/8" thick Natcor panels. Neither product is believed to have been patented.

National Gypsum has no indication that Keasbey & Mat-tison supplied any warnings to National Gypsum in connection with sales of its asbestos cement board, and National Gypsum's specifications make no reference to warnings. National Gypsum was not aware of any possibility of injury from the use of Natcor or Natcor Sheathing that would have required any such warning. National Gypsum is not aware of having published any sales material regarding this product.

ATTACHMENT UU TO ANSWERS TO INTERROGATORIES

Natcor and Natcor Sheathing

From approximately 1944 until 1946, National Gypsum Company manufactured and marketed Gold Bond Natcor and Natcor Sheathing. The product was discontinued after World War II.

Natcor was intended for use as bulkheading and partitions in ships. It consisted of a gypsum-board core faced front and back with Keasbey & Mattison asbestos cement board.

Natcor Sheathing was intended for use in lining, sheathing and ceiling application in ships. It consisted of a gypsum-board core faced on one side with Keasbey & Mattison asbestos cement board and on the other side with aluminum foil.

The only asbestos in these products was contained in the asbestos cement panels manufactured by Keasbey & Mattison Co., and National Gypsum has no information on the type, percentage or source of asbestos in these products.

Natcor and Natcor Sheathing were supplied in eight-foot lengths of varying widths and thicknesses. Both products could also be specially ordered in other sizes. The products were shipped in stacks protected by gypsum-board and bracing.

In 1944, the U.S. Coast Guard and the Maritime Commission approved the 3/4" and 7/8" thicknesses of Natcor for use as Class B bulkhead panels. In 1944, these agencies also

of manufacture. No warnings or instructions for use are mentioned in the specifications; National Gypsum was not aware of any possibility of injury from the use of asbestos-faced mineral wool board that would have required any such warning.

The product is believed to have been withdrawn from production because of poor market acceptance.

No design changes material to this action are known to have been made with respect to this product.

National Gypsum also sold asbestos stripping tape, which conformed to Bureau of Ships specifications, for use with asbestos-faced mineral wool board or alone. This product was purchased for resale from Keasbey & Mattison Company and is believed to have been made of reinforced asbestos paper. It was furnished in rolls containing 33 lineal yards. The chemical composition of this tape and the type of asbestos used are not known. National Gypsum is not aware of warnings or directions for use that may have accompanied this tape, and was not aware of any possibility of injury from the use of asbestos stripping tape that would have required any such warnings.

National Gypsum is not aware of any patents or sales material regarding these products.

ATTACHMENT MM TO ANSWERS TO INTERROGATORIES

Textures - Non-Spray

Gold Bond textures were decorative products that were made from ingredients similar to those used in joint treatment materials. They were used on walls or ceilings to hide slight surface imperfections.

National Gypsum Company manufactured and sold Gold Bond textures containing asbestos from approximately the late 1930's to 1976, non-asbestos textures continued to be sold after 1976. Textures were dry and usually white or off-white in color although premixed colors were available during the early years.

Trade names for textures sold by National Gypsum included Gold Bond Color Texture, Gold Bond Texture, Gold Bond Texas Texture, Gold Bond E-Z Tex, Gold Bond/Velvet Texture A.R., Gold Bond Super Westex, Gold Bond Vinyl Texture, Gold Bond Decorite, Gold Bond Shadowall, Gold Bond Craftex, Gold Bond Texas Westex, and Gold Bond Super White Dry Sealer. "Gold Bond" is a registered trademark of National Gypsum Company.

Gold Bond textures containing asbestos were manufactured at National Gypsum's plants in Bronx, NY, Good Hope, LA, Luckey, OH, Matteson, IL, Raritan, NJ, Rotan, TX, Trenton, NJ, Westwego, LA, Long Beach, CA, Los Angeles, CA, and Baltimore, MD. National Gypsum ceased using asbestos in its non-spray textures by 1976.

Gold Bond textures were packaged in cartons and bags. Prior to application, dry textures were mixed with clean water. Textures were generally spread on walls or ceilings with rollers.

The percentage by weight of chrysotile asbestos in textures ranged between 1.0% and 28.7%. The asbestos may have been supplied by Philip Carey, National Asbestos Mines Ltd., Union Carbide, or Johns-Manville. Asbestos was used to provide good application qualities and mixed wet bulk qualities, to control water usage, and to reduce cracking. NGC used only chrysotile asbestos fiber in its textures, primarily grades 7RF-3, 7MS-1 and SG-130.

Beginning in mid-1972, National Gypsum Company affixed asbestos "Caution" labels on texture packages. The notice read as follows:

CAUTION
Contains Asbestos Fibers.
Avoid Creating Dust.
Breathing Asbestos Dust May
Cause Serious Bodily Harm.

Prior to 1975, NGC added the following dust caution label to its dry texture products:

CAUTION
When mixing this product wear
eye protection and a respirator
which is NIOSH approved for
Toxic, Nuisance and Pneumoconiosis
producing dusts.

ATTACHMENT NN TO ANSWERS TO INTERROGATORIES

Textures - Sprav

Gold Bond spray textures were decorative textures that contained ingredients similar to those found in National Gypsum's joint treatment materials. Spray textures were designed for machine spray application on walls and ceilings. They were usually white or off-white in color.

National Gypsum Company manufactured and sold Gold Bond spray textures containing asbestos from approximately 1959 until 1972, at that time, non-asbestos formulations were developed, and continued to be sold. Hamilton Materials, Inc., Orange, California, also manufactured asbestos-containing spray textures for National Gypsum from 1967 until 1975. These were sold on the West Coast under the trade names of Gold Bond Spray Quick, Gold Bond Spray Quick A, and Gold Bond Wall Spray.

The trade names of the spray textures included Gold Bond Wall Spray Texture, Gold Bond Wall Spray, Gold Bond/Velvet White Super Spray, Gold Bond Spray Quick, Gold Bond Spray Quick A, Gold Bond/Velvet Spray Quick Texture, Gold Bond E-Z Spray Texture, and Gold Bond Perfect Spray and Gold Bond Super White Dry Sealer. "Gold Bond" is a registered trademark of National Gypsum Company.