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MAY 27 1994

94-02380

BARON & BUDD

IN RE: ASBESTOS LITIGATION

§
§
§

IN THE DISTRICT COURTS OF

TRAVIS COUNTY, T E X A S

ANSWERS AND OBJECTIONS OF THE ROCKBESTOS COMPANY TO
PLAINTIFFS MASTER INTERROGATORIES AND
REQUESTS FOR PRODUCTION PROPOUNDED TO DEFENDANT

PLAINTIFF'S
EXHIBIT
148

To: Plaintiffs, by and through their attorney of record, Russell W. Budd, Baron & Budd, P.C., The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

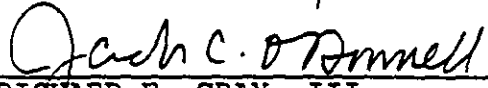
COMES NOW, The Rockbestos Company, and files its answers and objections to Plaintiffs' Master Interrogatories and Requests for Production as follows:

1. The Rockbestos Company, at the time of service of the above-referenced master interrogatories and requests for production of documents was not, and is presently not, a defendant in any Baron & Budd asbestos case, or any other asbestos case in Travis County, Texas. Therefore, The Rockbestos Company objects to each and every interrogatory and request for production because it is not a party to any such case.

2. Further, The Rockbestos Company has already answered virtually identical discovery in Dallas County, and hereby adopts and incorporates, by reference, its answers and objections to Plaintiffs' Master Interrogatories and Requests for Production filed on or about March 9, 1994, with Baron & Budd and in Cause No. 93-3625-I, Gambrell v. The Aber Co., et al, in the 162nd Judicial District Court of Dallas County, Texas.

Respectfully submitted,

GRAY & BECKER, P.C.
900 West Avenue
Austin, Texas 78701
(512) 482-0061
(512) 482-0924 - Telecopier


RICHARD E. GRAY, III
State Bar Number 08328300

JACK C. O'DONNELL
State Bar Number 14373800

ATTORNEY FOR THE ROCKBESTOS
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing answers and objections of The Rockbestos Company to Plaintiffs' Master Interrogatories and Requests for Production was sent by certified mail, return receipt requested to Russell Budd, Baron & Budd, 3102 Oaklawn Avenue, Suite 1100, Dallas, Texas 75219 and by Regular First Class United States mail, postage prepaid to all other known counsel of record on this the 25 day of May, 1994:


JACK C. O'DONNELL

JCO:slh (1255-2)
rgpdreg.ans

Robert D. Bjork, Jr.
Dorine R. Kohn
BJORK, FLEER, & LAWRENCE
483 Ninth Street
Oakland, California 94607
Telephone: (415) 832-8134

Attorneys for Defendant
The Rockbestos Company

File Recd. _____

SP. _____

JUN 11 1991

To File _____
Class _____
B/D/S _____
WC/DEF _____

7674

DEFDOC/
ROCKB

SUPERIOR COURT OF CALIFORNIA - COUNTY OF SAN FRANCISCO

In Re:

No. 828684

COMPLEX ASBESTOS LITIGATION

THE ROCKBESTOS COMPANY'S
AMENDED RESPONSES TO GENERAL
ORDER NO. 29 STANDARD
INTERROGATORIES

The Rockbestos Company ("Rockbestos"), pursuant to California Code of Civil Procedure Section 2030 and San Francisco General Order No. 29 submits the following amended responses and objections to Plaintiffs' Standard Interrogatories. These amended responses are based upon additional information obtained by Rockbestos since the date it filed responses. All prior responses to General Order No. 29 Standard Interrogatories are hereby withdrawn.

///

///

///

///

1 I. PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

2
3 Rockbestos, is a Delaware Corporation with its
4 principal place of business in Connecticut. The information
5 contained in these responses has been assembled by authorized
6 employees and counsel for Rockbestos. It is impossible to
7 reconstruct each step in the information gathering process or to
8 state that all pertinent documents have been discovered and
9 examined. It is also impossible to state that all individuals
10 with relevant knowledge have been contacted as of this date.
11 Investigation continues and Rockbestos specifically reserves the
12 right to revise, correct, supplement and amend these
13 interrogatory responses. Moreover, Rockbestos objects to the
14 interrogatories on the grounds that they seek "corporate
15 knowledge" because it is impossible for Rockbestos to set forth a
16 collective knowledge of all Rockbestos employees, past and
17 present.

18
19 Rockbestos has never mined asbestos fiber or
20 manufactured asbestos thermal insulation. Many of the
21 interrogatories request information relating to the mining of
22 asbestos and the processes utilized in manufacturing raw
23 asbestos. Rockbestos objects to these and other interrogatories,
24 propounded as a boilerplate set of interrogatories in that they
25 are not designed to elicit discoverable information from
26 Rockbestos.

27 / / /
28

1 Many of the interrogatories exceed the permissible
2 scope of discovery as defined by California Code of Civil
3 Procedure §2017, by requesting information which is neither
4 relevant to the subject matter of this action nor reasonably
5 calculated to lead to the discovery of admissible evidence. The
6 interrogatories are also overbroad as to time, scope, and
7 geographic boundaries because they seek information relating to
8 products manufactured between 1930-1985, a 55 year period, and
9 are not limited to products allegedly used by
10 plaintiff/plaintiff's decedent or allegedly sold and/or supplied
11 to plaintiff's/plaintiff's decedent's employers during the period
12 of plaintiff's/plaintiff's decedent's employment. Accordingly,
13 the interrogatories are objected to on these grounds and on the
14 further ground that the information sought by many of the inter-
15 rogatories is so burdensome to ascertain as to be unjust, harass-
16 ing, annoying and oppressive.

17
18 Rockbestos further objects to the interrogatories to
19 the extent that they assume the truth of matters specifically
20 denied by Rockbestos or which have not been established by
21 plaintiff. In addition, Rockbestos objects to the
22 interrogatories to the extent that they seek privileged
23 information, proprietary information, confidential trade
24 information, marketing information, chemical compositions and
25 other information entitled to protection under California Code of
26 Civil Procedure §2017 and 2030, and/or which is otherwise subject
27 to the attorney-client privilege or the attorney work product
28

1 doctrine as provided by California Code of Civil Procedure
2 §2018.

3
4 Rockbestos was not a party to any action in San
5 Francisco Superior Court on June 21, 1985 when General Order No.
6 29 was issued and did not receive notice of the application for
7 consolidated discovery. Moreover, Rockbestos did not appear at
8 the hearing on the motion for the order consolidating discovery
9 and has had no opportunity to be heard with regard to that order
10 or to the form of discovery propounded. In addition, the Civil
11 Discovery Act of 1986, California Code of Civil Procedure §2016
12 et seq., which became effective on July 1, 1987, has superseded
13 General Order No. 29. Thus, the Court is without jurisdiction to
14 modify the discovery procedures established by the state legisla-
15 ture and codified in California Code of Civil Procedure §2030,
16 and absent a legislative enactment, the legislature's governing
17 provisions pertaining to interrogatories cannot be overruled by a
18 local court rule. Shadle v. City of Corona, 96 Cal. App. 3d
19 173, 177 (1979).

20 The interrogatories also violate the order amending
21 General Order No. 43, of April 2, 1990 which declares that the
22 provisions of California Code Of Civil Procedures §2024 through
23 2036 are applicable to all complex asbestos litigation without
24 exception.

25
26 / / /
27 / / /
28

1 More specifically, the interrogatories and their
2 subparts exceed the Statutory number permitted by California Code
3 of Civil Procedure §2030(c) and are not accompanied by a
4 declaration for additional discovery. Thus, the interrogatories
5 are objected to on these grounds and to the extent that many of
6 the interrogatories are not complete in and of themselves,
7 contain subparts, are compound, conjunctive or disjunctive in
8 violation of California Code of Civil Procedure §2030(c)(5).
9 Moreover, the interrogatories contain instructions and
10 "definitions" which do not comply with California Code of Civil
11 Procedures §2030(c)(5), are overbroad, vague, inconsistent with
12 normal usage and meaning and are unintelligible. Accordingly,
13 the responses utilize those terms as they are commonly
14 understood.

15
16 Rockbestos does not waive any right or objection,
17 whether or not asserted herein, to the interrogatories or to the
18 admission of the interrogatories and responses at trial. The
19 preliminary statement and general objections contained herein are
20 specifically made a part of and incorporated by reference into
21 each of the responses set forth below.

22
23 Response to Interrogatory No. 1:

24
25 See Preliminary Statement and General Objections.
26 Notwithstanding these objections, Rockbestos responds:

27 (a) George Littlehales;
28

ATTORNEY AT LAW
463 N. STREET
OAKLAND, CALIF. 94607
(415) 832-8134

(b) The Rockbestos Company, 285 Nicoll Street, New Haven, Connecticut 06504;

(c) Quality Assurance Manager;

(d) Dates of Employment	Position Held
1967-1968	Personnel Mgr.
1968-1971	Materials Mgr.
1971-1973	Superintendent
1973-Present	Quality Assurance Mgr.

Response to Interrogatory No. 2:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

(a)-(g) The Rockbestos Company was incorporated on March 1, 1923. It is a Delaware Corporation with its principal place of business at 285 Nicoll Street, New Haven, Connecticut 06504. The registered agent for service of process is United States Corporation Company, 6430 Sunset Boulevard, Suite 1117, Los Angeles, California 90028. It has maintained a Certificate of Authority to do business in California from January 29, 1981 to the present date.

/ / /
/ / /
/ / /
/ / /

Response to Interrogatory No. 3:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Rockbestos was known as Rockbestos Products Corporation dating from March 1, 1923. In 1959 it became a division of Cerro Corporation. In 1984, it became The Rockbestos Company.

Response to Interrogatory No. 4:

See Preliminary Statement and General Objections.

Notwithstanding these objections Rockbestos responds:

No.

Response to Interrogatory No. 5:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 6:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

1 (a) The Rockbestos Company, 285 Nicoll Street, New
2 Haven, Connecticut 06511;

3 (b) E. C. Randall, Vice President, Finance; The
4 Rockbestos Company, 285 Nicoll Street, New Haven, Connecticut
5 06511.

6
7 Response to Interrogatory No. 7:
8

9 See Preliminary Statement and General Objections.
10 Notwithstanding these objections Rockbestos responds:

11
12 No.

13
14 Response to Interrogatory No. 8:
15

16 See Preliminary Statement and General Objections.
17 Notwithstanding these objections, Rockbestos responds:

18
19 Between 1930 and 1985 Rockbestos distributed, marketed,
20 sold, labeled and manufactured wire and cable products with
21 insulation containing encapsulated and saturated asbestos.
22

23 / / /

24 / / /

25 / / /

26 / / /

27 / / /

28 / / /

Response to Interrogatory No. 9:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Not applicable.

Response to Interrogatory No. 10:

See Preliminary Statement and General Objections.

The subparts of this interrogatory request information so burdensome to ascertain, as to be unjust, harassing, annoying and oppressive because the information relates to numerous products manufactured during a 55 year period and the request is not limited to products allegedly used by plaintiff/plaintiff's decedent or allegedly sold and/or supplied to plaintiff's/plaintiff's decedent's employers during the period of plaintiff's/plaintiff's decedent's employment. In addition, the interrogatory requests detailed information not reasonably calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation. Plaintiff has not established that plaintiff/plaintiff's decedent utilized any product manufactured by Rockbestos. Rockbestos will attempt to provide all known, pertinent information for products identified by plaintiff/plaintiff's decedent. Notwithstanding these objections, Rockbestos responds:

(a) Between 1930 and 1985 Rockbestos manufactured and marketed wire and cable products, some of which contained encapsulated and saturated asbestos. These products included: apparatus and motor lead wire, appliance and fixture wire, control cable, power cable, switchboard wire, high temperature wire, furnace and mud gun cable, shipboard cable and instrumentation cable, and may also have been referenced by National Electric Code and other specifications and designations. Rockbestos utilized various brand names and trademarks during this period, including, Firezone, Firewall, Rocktherm, Pyrotrol, Phosroc, Cryozone and H-Zone;

(b)-(c) Refer to Response to Interrogatory No. 10(a);

Some of the following wire and cable products contained encapsulated and saturated asbestos during the indicated periods.

<u>Wire/Cable Products</u>	<u>Approx. Dates of Manufacture</u>
Apparatus wire	1936 to 1985
Motor lead wire	1930 to 1985
Appliance and fixture wire	1930 to 1985
Control cable	1930 to 1985
Power cable	1930 to 1985
Switchboard wire	1930 to 1985
High temperature wire	1938 to 1985
Furnace and mud gun cable	1974 to 1980

1 Shipboard cable 1930 to 1979

2 Instrumentation cable 1930 to 1977

3
4 (d) It is unduly burdensome for Rockbestos to provide
5 the chemical composition of each such product because Rockbestos
6 manufactured many different wire and cable products during the
7 fifty-five year period, and the chemical composition varied
8 broadly over time and with the type and size of the wire and
9 cable.

10 The following are examples:
11

12 Year: 1981
13

14 Product

15 #14 Firezone 101
16 (High Temperature TAGT)

17 Components

18 Nickel clad conductor	47.4
19 Teflon tape	9.3
20 Teflon coated glass yarn	13.0
21 Teflon finish compound	1.6
22 Glass yarn	4.9
23 Silicone and resin finish compounds	9.7
24 Lap: Asbestos	12.1
25 Other non-asbestos components	2.0

26
27
28

BJORK, FLEEN & LAWRENCE
ATTORNEYS AT LAW
4831 17 STREET
OAKLAND, CALIFORNIA 94607
(415) 832-6134

1 Year: 1979
2
3 Product:
4 #14 AVA
5
6 Components: %
7 Copper conductor 29.0
8 Tape .5
9 Mylar .7
10 Saturant 29.5
11 Varnished cambric tape 12.8
12 Lap and yarn: asbestos 23.5
13 other non-asbestos components 4.1

14 Year: 1981
15
16 Product:
17 #8 AVA
18
19 Components %
20 Copper Conductor 55.5
21 Nomex tape .4
22 Mylar .5
23 Varnished cambric tape 9.2
24 Saturant 18.4
25 Lap and yarn: Asbestos 13.4
26 Other non-asbestos components 2.4

27 / / /
28 / / /

1 Rockbestos used only chrysotile asbestos in
2 manufacturing wire and cable products with insulation containing
3 encapsulated and saturated asbestos.
4

5 (e) It would be unduly burdensome to provide a
6 description of the physical appearance and nature of each product
7 because Rockbestos manufactured many different wire and cable
8 products during the fifty-five year period. To the extent
9 possible, Rockbestos will attempt to provide this information for
10 products to which plaintiff/plaintiff's decedent alleges
11 exposure. Rockbestos' wire and cable products generally did not
12 have any external markings, although the boxes, spools or reels
13 containing the products generally were marked or tagged with the
14 names Cerro or Rockbestos, the brand or trade names Firezone,
15 Firewall, Rocktherm, Pyrotrol, Phosroc, Cryozone or H-Zone, an
16 hourglass within a circle or other distinctive markings. In
17 general, wire and cable products were marked internally with
18 marker threads.
19

20 (f) It would be unduly burdensome to provide a
21 detailed description of the intended use of each product. To the
22 extent possible, Rockbestos will attempt to provide this
23 information for products to which plaintiff/plaintiff' decedent
24 alleges exposure. The intended use of wire and cable products
25 with insulation containing encapsulated and saturated asbestos is
26 in those applications requiring resistance to high temperature
27
28

1 and flame, and as required in military, government and trade
2 specifications for certain wire and cable construction;

3
4 (g) Rockbestos is without sufficient information and
5 knowledge at this time to respond to this subpart. Investigation
6 is continuing;

7
8 (h) The asbestos suppliers include:

9 1. Raybestos-Manhattan Corp.

10 Products: Lap, roving yarn.

11 Dates: 1945-1986

12 2. Amatex Corp.

13 Products: Roving yarn.

14 Dates: 1976-1986

15 3. Harco Chemical

16 Products: Cable filler

17 Dates: 1950-1986

18 4. Manning Paper Co.

19 Products: S.A. Asbestos tape

20 Dates: 1970-1986

21 5. Facile Div. Sun Chemical Corp.

22 Products: AM - Asbestos Mylar Tape

23 Dates: 1970-1986

24 6. Johns-Manville Corp.

25 Products: AM - Asbestos Mylar Tape

26 Dates: 1976-1986
27
28

1 (i) Refer to Exhibit 1. Addresses are being complied
2 and will be supplied to the extent they are available. Pre-1980
3 sales records and data for the defined geographic area are not in
4 existence with the exception of some records reflecting sales of
5 wire and cable products, some of which contained encapsulated and
6 saturated asbestos, to nuclear power plants. It would be unduly
7 burdensome so as to be unjust and oppressive to ascertain the
8 trade or brand names of each product sold in the defined geo-
9 graphic area between 1981 through 1985 because the information
10 would have to be compiled from numerous uncatalogued documents.
11 Please refer to Response to Interrogatory No. 10(a) for Rockbes-
12 tos' trade and brand names.

13
14 (j) A compilation of sales data for the period 1981 to
15 1985 is maintained by the Rockbestos Company, 285 Nicoll Street,
16 New Haven, Connecticut 06504. Underlying records no longer
17 exist. E.C. Randall, Vice-President, Finance, is the Custodian
18 of Records.

19
20 Response to Interrogatory No. 11:

21
22 See Preliminary Statement and General Objections.
23 Notwithstanding these objections, Rockbestos responds:

24
25 No.

26 / / /

27 / / /

28

Response to Interrogatory No. 12:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 13:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Not applicable.

Response to Interrogatory No. 14:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 15:

See Preliminary Statement and General Objections.

In addition, this interrogatory incorrectly assumes that Rockbestos' wire and cable products, with insulation containing encapsulated and saturated asbestos, were hazardous.

1 (a)-(c) Refer to Exhibit 2. Between 1979 and 1986 a
2 warning was included on all boxes, spools or reels of cable and
3 wire products containing insulation with encapsulated and satu-
4 rated asbestos.

5
6 Response to Interrogatory No. 16:

7
8 See Preliminary Statement and General Objections.
9 Notwithstanding these objections, Rockbestos responds:

10
11 Not applicable.

12
13 Response to Interrogatory No. 17:

14
15 See Preliminary Statement and General Objections. This
16 interrogatory requests detailed information not calculated to
17 lead to the discovery of admissible evidence and which falls
18 outside the scope of this litigation. In addition, the
19 information requested by this interrogatory is so burdensome to
20 ascertain as to be unjust, harassing, annoying and oppressive
21 because it relates to numerous products manufactured during a 55
22 year period and is not limited to products allegedly used by
23 plaintiff/plaintiff's decedent or allegedly sold and/or supplied
24 to plaintiff's/plaintiff's decedent's employer during the period
25 of plaintiff's/plaintiff's decedent's employment and would have
26 to be derived from numerous uncatalogued documents.
27 Notwithstanding these objections, Rockbestos responds:
28

1 Notwithstanding these objections, Rockbestos responds:

2
3 Rockbestos is without sufficient information to
4 identify each product and describe each product's trademark, logo
5 or color coding, or to state if and when, the practice to place
6 identifying markings upon the product was begun, when it ended or
7 to provide a detailed description of the pertinent markings
8 and/or the purpose, if any, of such markings. Rockbestos' wire
9 and cable products generally did not have any external markings,
10 although the boxes, spools, or reels containing the products,
11 were marked or tagged with the names Cerro or Rockbestos, or the
12 brand or trade names previously identified in Response to
13 Interrogatory No. 10(a). In general, wire and cable products
14 were marked internally with marker threads.

15
16 Rockbestos will attempt to provide all known, pertinent
17 information for products identified by plaintiff/plaintiff's
18 decedent.

19
20 Response to Interrogatory No. 18:

21
22 See Preliminary Statement and General Objections.

23 Notwithstanding these objections, Rockbestos responds:

24
25 None.

26 / / /

27 / / /

Response to Interrogatory No. 19:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 20:

See Preliminary Statement and General Objections.

Rockbestos specifically objects to this interrogatory on the grounds that it is overbroad, burdensome and oppressive. The interrogatory requests detailed information not necessarily calculated to lead to the discovery of admissible evidence and which falls outside the scope of this litigation.

Notwithstanding these objections, Rockbestos responds:

Numerous uncatalogued documents responsive to this request are maintained at The Rockbestos Company, 285 Nicoll Street, New Haven Connecticut 06504, and arrangements may be made to inspect the documents in New Haven, Connecticut. E.C. Randall, Vice-President, Finance is the custodian of these documents.

/ / /

/ / /

/ / /

Response to Interrogatory No. 21:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Not applicable.

Response to Interrogatory No. 22:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

There are no records which reflect any such sales or shipments.

Response to Interrogatory No. 23:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

No.

Response to Interrogatory No. 24:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Not applicable.

ATTORNEY AT LAW
403 A STREET
OAKLAND, CALIFORNIA 94607
(415) 832-8134

Response to Interrogatory No. 25:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

Rockbestos contends it had general liability coverage for the relevant time periods; however, the extent and application of insurance coverage is currently disputed.

Response to Interrogatory No. 26:

See Preliminary Statement and General Objections.

Notwithstanding these objections, Rockbestos responds:

1930 - 1943, unknown;

1943 - 1959, Travelers;

1959 - 1976, Liberty Mutual;

1/1/76 - 9/1/76, Home;

9/1/76 - Present, Self insured.

DATED: June 3, 1991

BJORK, FLEER, LAWRENCE

By: Dorine R Kohn

Dorine R. Kohn
Attorneys for Defendant
The Rockbestos Company

400 N. STREET
OAKLAND, CA 94607
TEL 415-778-9134

VERIFICATION

I, George G. Littlehales, am the Quality Assurance Manager for The Rockbestos Company, a party in the above-entitled action, and as such am authorized to make the following verification. I have read the foregoing Amended Responses to Plaintiff's General Order No. 29 Standard Interrogatories and know the contents thereof. No single official, employee, or former employee of The Rockbestos Company has personal knowledge of all such matters; the information contained herein has been compiled at my direction by counsel for The Rockbestos Company. I am informed and believe all the responses are true and verify the responses on that basis.

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

Executed this 3rd day of June, 1991, at New Haven, Connecticut.

By: George Littlehales
George Littlehales

Exhibit 1

<u>Name</u>	<u>Year</u>	<u>Order Quantity (feet)</u>
Allied Electric Co.	1985	2,000
	1984	500
Allwire, Enc.	1985	150
	1982	230
	1981	50
Atomel Products	1985	1,000
	1984	450
Bay Associates	1984	41,195
Chevron Research	1984	250
Cereske	1984	4,300
	1983	9,518
	1982	11,490
	1981	17,368
Graybar Electric	1984	1,500
	1983	1,793
	1982	2,032

Mil-Spec Supply Co.	1981	500
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R.S. Deal	1985	1,513
	1984	1,857
	1983	1,595
	1982	1,200
	1981	25

Syston Donner Corp.	1984	525
	1981	400

U. Of Cal.	1983	2,275
------------	------	-------

Valley Electric Co.	1981	1,125
---------------------	------	-------

Varian Associates	1985	15,500
	1984	18,607
	1983	12,174
	1982	13,219
	1981	7,800

Wille Electric Sy.	1985	500
	1984	100
	1981	300

CAUTION

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

CAUTION

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

CAUTION

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CAUTION

CONTAINS ASBESTOS FIBERS
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SERIOUS BODILY HARM

CAUTION

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

EXHIBIT 2

(Labels Reduced In Size)

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PROOF OF SERVICE BY MAIL
(C.C.P. 1013, 2015.5)

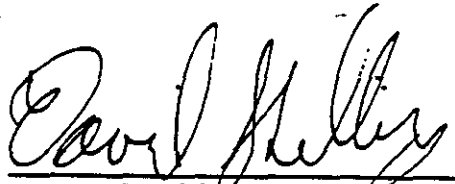
I am a citizen of the United States and a resident of Alameda County. I am over the age of eighteen years and not a party to the within action; my business address is 483 Ninth Street, Oakland, California 94607.

On the date below, I served THE ROCKBESTOS COMPANY'S AMENDED TO GENERAL ORDER NO. 29 INTERROGATORIES. by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Oakland, Alameda County, California, addressed as follows:

SEE ATTACHED LIST(S)

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

Executed at Oakland, California on June 6, 1991.


David W. Shelley

IN RE COMPLEX ASBESTOS LITIGATION - SAN FRANCISCO COUNTY

DEFENSE COUNSEL SERVICE LIST

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Walnut Creek, CA 94596

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Carlisle/Waldron Duffy

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Designated Defense Counsel

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Attorneys for:
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Winwiddle Construction/
Jord Wide Trading/
North American Refractories Co.

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Attorneys for:
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Attorneys for:
H.K. Porter Company, Inc.

Henry D. Rome, Esq.
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Attorneys for:
Synkoloid Company

Mike Stanley, Esq.
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Attorneys for:
Fibreboard Corporation/
Paraffine/Pabco

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Attorneys for:
Socomo-Sierra/
Socomo Mfg./Parker-Hannifin/
Airco Weld

Kathleen Farley, Esq.
Burnhill, Morehouse, Burford,
& Schofield & Schiller
1220 Oakland Blvd., Ste. 200
P.O. Box 5168
Walnut Creek, CA 94596

Attorneys for:
Kelly Moore Paint Co.

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