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Attorneys for Defendant
SEQUOIA VENTURES INC.
formerly known as BECHTEL CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

IN RE: COMPLEX ASBESTOS LITIGATION	Case No.: 607734-9 DEFENDANT SEQUOIA VENTURES INC.'S (FORMERLY KNOWN, AND ERRONEOUSLY SUED AS BECHTEL CORPORATION) SUPPLEMENTAL RESPONSES TO INTERROGATORIES
IN RE: SHIPYARD AND APPLICATOR ASBESTOS CASES (CONSOLIDATED FOR DISCOVERY)	No. 537868-7

PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: Defendant SEQUOIA VENTURES INC.

SET NUMBER: ONE (1)

Defendant SEQUOIA VENTURES INC. (FORMERLY KNOWN AS BECHTEL CORPORATION) ("Defendant") hereby further responds to Plaintiffs' Interrogatories to Defendant.

GENERAL OBJECTIONS

The following General Objections apply to and are incorporated herein by reference in each and every response to

c. Senior Administrative Assistant

d. Mr. Pugliese was first employed with Bechtel in May, 1989 as a senior paralegal. Mr. Pugliese assumed his current position of Senior Administrative Assistant in September, 1992.

INTERROGATORY NO. 4:

State whether YOU have ever been registered or qualified to do business in the State of California. If so, state the date YOU became qualified to conduct business in the State of California.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

Bechtel Brothers McCone Corporation (now known as Sequoia Ventures Inc.) was issued a contractor's license by the State of California in 1945.

INTERROGATORY No. 16:

If THIS DEFENDANT owned or operated facilities in which ASBESTOS-CONTAINING PRODUCT(S) have been manufactured, processed and/or assembled, please state:

a. the date said facilities began operation;

b. the date said facility ceased operation; and c. the name of each type of ASBESTOS-CONTAINING PRODUCT manufactured, processed or assembled at each such facility.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16:

a. 1946.

b. 1953.

c. Large bore pipe.

INTERROGATORY NO. 33:

Has THIS DEFENDANT distributed any brochures or pamphlets that contain warnings of any asbestos-related health hazards; if so, please state:

a. the wording of such warning;

b. the method used to distribute such brochures or pamphlets;

c. the date(s) such brochures or pamphlets were first issued;

d. whether THIS DEFENDANT has exemplar(s) of such brochures or pamphlets;

e. the IDENTITY of the custodian of such exemplar(s).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 33:

Defendant did not manufacture and/or distribute any asbestos-containing product. At this time, Defendant has no information that it distributed any brochures or pamphlets that contained warnings of any asbestos-related health hazards.

INTERROGATORY NO. 34:

Did THIS DEFENDANT warn its employees and/or CONTRACT UNIT(S), anywhere in the United States, that exposure to asbestos could be hazardous to human health. If so, state:

a. whether copies of DOCUMENTS containing such warnings exist;

b. the IDENTITY of the custodian of such DOCUMENTS.

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