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Attorneys for Defendant
SEQUOIA VENTURES INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

IN RE:

COMPLEX ASBESTOS LITIGATION

NO. 828684

SEQUOIA VENTURES INC.'S
RESPONSES TO PLAINTIFFS'
STANDARD INTERROGATORIES
TO ALL DEFENDANTS PURSUANT
TO GENERAL ORDER 129

INTERROGATORY NO. 1:

IDENTIFY the person verifying these answers on YOUR behalf.

RESPONSE TO INTERROGATORY NO. 1:

Richard Pugliese.

INTERROGATORY NO. 2:

State the date of first employment with YOU, and the dates and
titles of each job position the person verifying these
interrogatories has held while employed by YOU.

RESPONSE TO INTERROGATORY NO. 2:

Mr. Pugliese was first employed in May 1989.

1 Mr. Pugliese assumed his current position of Senior Paralegal in
2 September, 1992.

3 INTERROGATORY NO. 3:

4 State whether or not YOU are a corporation, and if so,
5 state:

- 6 A. YOUR correct corporate name;
- 7 B. YOUR state of incorporation;
- 8 C. The date of YOUR incorporation;
- 9 D. The address of YOUR principal place of business;
- 10 E. Whether or not YOU have ever held a certificate of
11 authority to do business in the State of California, and if so, the
12 inclusive dates of any certificate;
- 13 F. If YOU are wholly owned or the majority interest of
14 YOUR company is owned by another business entity, state the entity's
15 name and principal place of business;
- 16 G. Whether YOU have any business offices in
17 California, and, if so, YOUR principal place of business in
18 California.

19 RESPONSE TO INTERROGATORY NO. 3:

- 20 Yes.
- 21 a. Sequoia Ventures Inc. ("SVI").
 - 22 b. Delaware
 - 23 c. September 10, 1945
 - 24 d. 50 Beale Street, San Francisco, CA.
 - 25 e. At all relevant times, SVI has had a certificate of
26 authority to do business in this state.
 - 27 f. Not applicable.

1 g. See (d) above.

2 INTERROGATORY NO. 4:

3 Have YOU ever been identified, known, or done business under
4 any other name in the State of California?

5 RESPONSE TO INTERROGATORY NO. 4:

6 Yes.

7 INTERROGATORY NO. 5:

8 If your answer to Interrogatory No. 4 is in the affirmative,
9 please state such name or names and the time period during which
10 THIS DEFENDANT was so known or identified.

11 RESPONSE TO INTERROGATORY NO. 5:

12 September 10, 1945 - January 2, 1947: Bechtel Brothers
13 McCone Company; January 2, 1947 - January 2, 1980: Bechtel
14 Corporation.

15 INTERROGATORY NO. 6:

16 If YOU are not a corporation, what is YOUR business structure
17 (partnership, joint venture, sole proprietorship, etc.).

18 RESPONSE TO INTERROGATORY NO. 6:

19 Not applicable.

20 INTERROGATORY NO. 7:

21 If YOU are not a corporation, please IDENTIFY all persons or
22 other entities with an ownership interest in YOU.

23 RESPONSE TO INTERROGATORY NO. 7:

24 Not applicable.

25 INTERROGATORY NO. 8:

26 If you are not a corporation, please state the following:

27 A. The address where the HISTORICAL RECORDS of THIS

1 DEFENDANT are currently located; and

2 B. The name, job title and current address of the
3 Custodian for THIS DEFENDANT'S HISTORICAL RECORDS.

4 As used herein, "HISTORICAL RECORDS" shall include all
5 DOCUMENTS relating to the formation of THIS DEFENDANT, all minutes
6 of partners', general partners', or other owners' meetings, and all
7 DOCUMENTS relating to THIS DEFENDANT's merger with, acquisition of
8 or purchase, or sale of or by any other COMPANY.

9 RESPONSE TO INTERROGATORY NO. 8:

10 Not applicable.

11 INTERROGATORY NO. 9:

12 IDENTIFY YOUR custodian of Business Records.

13 RESPONSE TO INTERROGATORY NO. 9:

14 Requests for records can be made to counsel for
15 Defendant.

16 INTERROGATORY NO. 10:

17 IDENTIFY the person or persons most knowledgeable about:

18 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS
19 CONTAINING PRODUCTS;

20 B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING
21 PRODUCTS;

22 C. YOUR contracting with others to do work involving
23 use or handling of RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS.

24 RESPONSE TO INTERROGATORY NO. 10:

25 Defendant has conducted a reasonable search and diligent
26 inquiry and determined that there is no current employee with
27 personal knowledge regarding Defendant's use, acquisition or

1 contracting with others to do work involving the use or handling of
2 asbestos-containing products.

3 INTERROGATORY NO. 11:

4 For DEFENDANTS involved in the MARKETING of ASBESTOS-
5 CONTAINING PRODUCTS, state the IDENTITY of physicians, medical
6 directors and/or industrial hygienists employed by YOU during the
7 time frame or prior to the time YOU discontinued the marketing of
8 such products. All other DEFENDANTS need only respond as to medical
9 directors and/or industrial hygienists or physicians employed in the
10 area of employee health and safety. PREMISES owners and domestic
11 corporations need only respond as to the United States.

12 RESPONSE TO INTERROGATORY NO. 11:

13 James Christiansen (deceased); Robert Allbaugh
14 (deceased); Richard Boley, 4533 Tuolumae Way, Concord, California;
15 and Jim Kegebein (address unknown).

16 INTERROGATORY NO. 12:

17 Has any employee of THIS DEFENDANT testified by deposition or
18 at trial on behalf of THIS DEFENDANT in a third-party case, in which
19 THIS DEFENDANT was a party, wherein the plaintiff has alleged an
20 asbestos-related injury? If so, for each such third-party case
21 (except that Premises Defendants and Contractor Defendants need
22 answer only with respect to cases relating to sites within the
23 GEOGRAPHIC AREA) please state:

- 24 A. The caption and case number;
25 B. The court filing including state and county;
26 C. The date of deposition or trial testimony;
27 D. The name and address of plaintiffs counsel of

Recd
Brayton

1 record;

2 E. The name and address of the court

3 RESPONSE TO INTERROGATORY NO. 12:

4 a. Richard Pugliese in the following cases:

- 5 1. Alice Battistessa, SF No. 966343, Brayton,
6 Harley, Curtis.
7 2. Harold Dennis, SF No. 943238, Brayton, Harley,
8 Curtis.
9 3. Barney Dye, SF No. 966343, Wartnick, Chaber,
10 et al.
11 4. Harry Flynn, SF No. 974994, Wartnick, Chaber,
12 et al.
13 5. Angelo Viale, SF No. 965247, Wartnick, Chaber,
14 et al.

15 b. Elizabeth Faxon in the following cases:

- 16 1. Robert J. Grahn, SF No. 922682, Brayton,
17 Harley, Curtis.
18 2. Martin J. Prince, SF No. 954770, Brayton,
19 Harley, Curtis.

20 c. Duane Countryman in the following cases:

- 21 1. Jack Frost, SF No. 948397, Brayton, Harley,
22 Curtis.

23 d. Patricia Eastwood in the following cases:

- 24 1. Robert J. Grahn, SF No. 922682, Brayton,
25 Harley, Curtis.
26 2. James Battistessa, SF No. 948352, Brayton,
27 Harley, Curtis.

1 e. Richard Kopf in the following cases:

- 2 1. James Battistessa, SF No. 948352, Brayton,
3 Harley, Curtis.
4 2. Robert Fisher, SF No. 963843, Brayton, Harley,
5 Curtis.
6 3. William Tomskey, SF No. 969912, Brayton,
7 Harley, Curtis.
8 4. Margaret McDonnell, SF No. 972446, Brayton,
9 Harley, Curtis.
10 5. Robert Durenberger, SF No. 975212, Brayton,
11 Harley, Curtis.
12 6. Henrietta Mitchell, SF No. 965292, Brayton,
13 Harley, Curtis.
14 7. Camille Almada, SF No. 978160, Brayton,
15 Harley, Curtis.

16 INTERROGATORY NO. 13:

17 For each of the following, please state whether, at any time
18 within the time frame or until such time as any defendant which had
19 been engaged in MARKETING RAW ASBESTOS or ASBESTOS- CONTAINING
20 PRODUCTS discontinued the MARKETING of such products, THIS DEFENDANT
21 was a member or paid dues for any representative of THIS DEFENDANT
22 (excluding faculty members of educational institutions) to be a
23 member of the following:

- 24 A. American Conference of Governmental Industrial
25 Hygienists;
26 B. American Industrial Hygiene Association;
27 C. American Petroleum Institute;

- 1 D. American Railroad Association;
- 2 E. Asbestos Cement Producers Association;
- 3 F. Asbestos Information Association (AIA) (please
4 answer through date of your answers);
- 5 G. Asbestos Information Association/North America
6 (AIA/NA) (please answer through date of your answers);
- 7 H. Asbestos Textile Institute (ATI);
- 8 I. Industrial Hygiene Foundation and/or Industrial
9 Health Foundation (IHF);
- 10 J. Industrial Mineral Insulation Manufacturers
11 Institute;
- 12 K. Magnesia Insulation Manufacturers' Association;
- 13 L. Magnesia Silica Insulation Manufacturers
14 Association;
- 15 M. Mineral Wool Institute;
- 16 N. National Insulation Manufacturers Association
17 (NIMA);
- 18 O. National Safety Council;
- 19 P. New York Academy of Sciences;
- 20 Q. Quebec Asbestos Mining Association (QAMA);
- 21 R. Refractories Institute;
- 22 S. Safe Building Alliance (please answer through date
23 of your answers);
- 24 T. Thermal Insulation Manufacturers Association
25 (TIMA);
- 26 U. U.S. Maritime Commission;
- 27 V. IDENTIFY any other organizations, associations or

1 groups of manufacturers, miners, distributors, importers, labelers,
2 suppliers, and/or sellers of ASBESTOS-CONTAINING PRODUCTS of which
3 THIS DEFENDANT was a member;

4 W. IDENTIFY any such representative of THIS DEFENDANT.

5 RESPONSE TO INTERROGATORY NO. 13:

6	A.	No.
7	B.	No.
8	C.	Yes.
9	D.	No.
10	E.	No.
11	F.	No.
12	G.	No.
13	H.	No.
14	I.	No.
15	J.	No.
16	K.	No.
17	L.	No.
18	M.	No.
19	N.	No.
20	O.	Yes.
21	P.	No.
22	Q.	No.
23	R.	No.
24	S.	No.
25	T.	No.
26	U.	No.
27	V.	None.

1 INTERROGATORY NO. 14:

2 For each organization, association or other entity identified
3 in YOUR Response to Interrogatory No. 13, please state:

4 A. The dates during which THIS DEFENDANT was a member;

5 B. The name(s) of any publication(s) received by THIS
6 DEFENDANT from such association or organization;

7 C. The name of any committee or subcommittee of which
8 THIS DEFENDANT was a member, and the dates of such committee or
9 subcommittee membership.

10 RESPONSE TO INTERROGATORY NO. 14:

11 A. Defendant believes that corporate or individual
12 memberships in the organizations identified in Interrogatory No. 13
13 were held as follows:

14 National Safety Council:

15 a. No information regarding dates prior to

16 1986,

17 b. unknown

18 c. unknown

19 American Petroleum Institute:

20 a. 1955 through 1985

21 b. unknown

22 c. unknown

23 INTERROGATORY NO. 15:

24 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
25 containing results or conclusions of any studies and/or tests
26 conducted by Bonsib for Standard Oil of New Jersey relating to
27 asbestos exposure in the workplace or the human health consequences

1 of exposure to asbestos? If so:

2 A. Either (1) attach all DOCUMENTS evidencing the
3 information sought in this Interrogatory and its subparts to your
4 answers to these Interrogatories, or (2) attach disks containing
5 such data, or (3) describe such DOCUMENTS with sufficient
6 particularity that they may be made the subject of a request for
7 production of documents.

8 B. State the date upon which THIS DEFENDANT first
9 received such DOCUMENTS;

10 C. State the IDENTITY of the custodian of such
11 DOCUMENTS.

12 D. This interrogatory does not apply to DOCUMENTS
13 contained in a library maintained by a DEFENDANT hospital or a
14 DEFENDANT's library providing access to the general public.

15 RESPONSE TO INTERROGATORY NO. 15:

16 Defendant has conducted a diligent search and a
17 reasonable inquiry in an attempt to respond to this interrogatory
18 and based upon such and upon information and belief, Defendant
19 responds: No.

20 INTERROGATORY NO. 16:

21 Had THIS DEFENDANT prior to 1973 received a copy or any
22 portion of any studies and/or tests conducted by any insurance
23 company, including but not limited to Metropolitan Life Insurance
24 Company and Aetna Insurance relating to asbestos exposure in the
25 workplace or the human health consequences of exposure to asbestos?
26 If so:

27 A. Either (1) attach all DOCUMENTS evidencing the

1 information sought in this Interrogatory and its subparts to your
2 answers to these Interrogatories, or (2) attach disks containing
3 such data, or (3) describe such DOCUMENTS with sufficient
4 particularity that they may be made the subject of a request for
5 production of documents.

6 B. State the date upon which THIS DEFENDANT first
7 received such DOCUMENTS;

8 C. State the IDENTITY of the custodian of such
9 DOCUMENTS.

10 D. This interrogatory does not apply to DOCUMENTS
11 contained in a library maintained by a DEFENDANT hospital or a
12 DEFENDANT's library providing access to the general public.

13 RESPONSE TO INTERROGATORY NO. 16:

14 Defendant has conducted a diligent search and a
15 reasonable inquiry in an attempt to respond to this interrogatory
16 and based upon such and upon information and belief, Defendant
17 responds: No.

18 INTERROGATORY NO. 17:

19 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
20 containing results or conclusions of any studies and/or tests
21 conducted by any laboratory, including but not limited to, the
22 Saranac Laboratory relating to asbestos exposure in the workplace or
23 the human health consequences of exposure to asbestos? If so:

24 A. Either (1) attach all DOCUMENTS evidencing the
25 information sought in this Interrogatory and its subparts to your
26 answers to these Interrogatories, or (2) attach disks containing
27 such data, or (3) describe such DOCUMENTS with sufficient

1 particularity that they may be made the subject of a request for
2 production of documents.

3 B. State the date upon which THIS DEFENDANT first
4 received such DOCUMENTS;

5 C. State the IDENTITY of the custodian of such
6 DOCUMENTS;

7 D. This interrogatory does not apply to DOCUMENTS
8 contained in a library maintained by a DEFENDANT hospital or a
9 DEFENDANT's library providing access to the general public.

10 RESPONSE TO INTERROGATORY NO. 17:

11 Defendant has conducted a diligent search and a
12 reasonable inquiry in an attempt to respond to this interrogatory
13 and based upon such and upon information and belief, Defendant
14 responds: No.

15 INTERROGATORY NO. 18:

16 Had THIS DEFENDANT (except for a defendant that is an
17 educational institution) prior to 1973 ever maintained a library (or
18 libraries) which contained books, articles, periodicals, journals,
19 and/or reference materials that related to the subjects of asbestos,
20 industrial hygiene, medicine, safety and/or occupational disease. If
21 so, state:

22 A. The date each such library was established;

23 B. The location of each such library;

24 C. The IDENTITY of each librarian or other person in
25 charge of such library.

26 RESPONSE TO INTERROGATORY NO. 18:

27 Defendant has conducted a diligent search and a

1 reasonable inquiry in an attempt to answer this interrogatory.
2 During the relevant time period many libraries of engineering and
3 construction materials were maintained at various offices of
4 Defendant, by individual employees, and by internal organizations
5 within Defendant, but Defendant is unable to otherwise determine the
6 answer to this interrogatory.

7 INTERROGATORY NO. 19:

8 With the exception of OSHA compliance, had THIS DEFENDANT
9 (except for a defendant that is an educational institution) prior to
10 1980 exchanged DOCUMENTS or communicated with any person or other
11 COMPANY expressly regarding the results of tests and/or studies
12 relating to asbestos exposure in the workplace or the human health
13 consequences of exposure to asbestos? If so, state:

14 A. Each person or COMPANY with whom the information
15 was exchanged or to whom it was communicated;

16 B. The date(s) of any such exchanges or
17 communications;

18 C. The IDENTITY of the custodian of such DOCUMENTS.

19 RESPONSE TO INTERROGATORY NO. 19:

20 Defendant has conducted a diligent search and a
21 reasonable inquiry in an attempt to respond to this interrogatory
22 and based upon such and upon information and belief, Defendant
23 responds: No.

24 INTERROGATORY NO. 20:

25 Has any employee or designee of THIS DEFENDANT testified as a
26 representative of THIS DEFENDANT before the Occupational Safety and
27 Health Administration, the National Institute of Occupational Safety

1 and Health, or any committee or subcommittee of the United States
2 Congress relating to asbestos exposure in the workplace or the human
3 health consequences of exposure to asbestos? If so, please state:

4 A. The entity before whom such testimony was given;

5 B. The date(s) and location(s) of such testimony;

6 C. The IDENTITY of the individual(s) who so testified;

7 D. Whether any DOCUMENTS were presented to the entity
8 before which testimony was given;

9 E. Whether copies of DOCUMENTS presented were retained
10 by THIS DEFENDANT and, if so, state the IDENTITY of the custodian of
11 such DOCUMENTS.

12 RESPONSE TO INTERROGATORY NO. 20:

13 Defendant has conducted a diligent search and a
14 reasonable inquiry in an attempt to respond to this interrogatory
15 and based upon such and upon information and belief, Defendant
16 responds: No.

17 INTERROGATORY NO. 21:

18 Has THIS DEFENDANT (except for a defendant that is an
19 educational institution) conducted, or caused to be conducted,
20 tests, and/or studies of ambient asbestos dust created during the
21 manufacture, processing and/or assembling for sale of ASBESTOS-
22 CONTAINING PRODUCTS? If so, state:

23 A. Each manufacturing facility, including location and
24 address, at which any such test and/or study was conducted;

25 B. The date of each such test and/or study;

26 C. The individual(s) or entity conducting each such
27 test and/or study;

1 D. Whether THIS DEFENDANT has any DOCUMENTS containing
2 the results and/or conclusions of each such study;

3 E. The IDENTITY of the custodian of such DOCUMENTS.

4 RESPONSE TO INTERROGATORY NO. 21:

5 Not applicable.

6 INTERROGATORY NO. 22:

7 Has THIS DEFENDANT (except for a defendant that is an
8 educational institution) conducted, or caused to be conducted, any
9 tests and/or studies on ambient asbestos dust levels at any location
10 or job site where ASBESTOS-CONTAINING PRODUCTS were installed,
11 utilized or removed? If so, for the first 5 tests and/or studies,
12 state:

13 A. The location, including name and address, at which
14 each such test and/or study was conducted;

15 B. The individual(s) or entity conducting each such
16 test and/or study;

17 C. The date of each such test and/or study;

18 D. Whether THIS DEFENDANT has any DOCUMENTS containing
19 the results and/or conclusions of each such test and/or study;

20 E. The IDENTITY of the custodian of such DOCUMENTS.

21 RESPONSE TO INTERROGATORY NO. 22:

22 Yes. Defendant is unable to determine the first five
23 studies.

24 INTERROGATORY NO. 23:

25 Did THIS DEFENDANT (except for a defendant that is an
26 educational institution) have any laboratory or other similar type
27 of facility anywhere in the United States at which it conducted, or

1 caused to be conducted, any tests and/or studies of ASBESTOS-
2 CONTAINING PRODUCTS or RAW ASBESTOS relating to the health
3 consequences of asbestos or the dust generated by any use of
4 asbestos or ASBESTOS-CONTAINING PRODUCTS. If so, state:

5 A. The location, including name and address, at which
6 each test and/or study was conducted;

7 B. The individual(s) or entity conducting each such
8 test and/or study;

9 C. The date of each such test and/or study;

10 D. Whether THIS DEFENDANT has any DOCUMENTS containing
11 the results and/or conclusions of each such test and/or study;

12 E. The IDENTITY of the custodian of such DOCUMENTS.

13 RESPONSE TO INTERROGATORY NO. 23:

14 No.

15 INTERROGATORY NO. 24:

16 Has THIS DEFENDANT made available to its employees a medical
17 examination program to determine the absence or presence of
18 asbestos-related disease? If so, state:

19 A. Whether chest x-rays or pulmonary function tests
20 were part of such program(s);

21 B. Whether participation in any such program was a
22 mandatory condition of employment or was voluntary;

23 C. Whether THIS DEFENDANT has DOCUMENTS of such
24 program(s);

25 D. The IDENTITY of the custodian of such DOCUMENTS.

26 RESPONSE TO INTERROGATORY NO. 24:

27 No.

1 INTERROGATORY NO. 25:

2 Prior to 1973, did any person file a Workers' Compensation
3 claim for asbestos-related injury against THIS DEFENDANT or against
4 any Workers' Compensation insurance carrier which provided coverage
5 for THIS DEFENDANT? If so, state the total number of such claims
6 and, for the first 20 such claims state:

- 7 A. The date of such claim;
8 B. The name of the claimant;
9 C. The case number;
10 D. The court in which the claim was filed;
11 E. The IDENTITY of THIS DEFENDANT's custodian of
12 DOCUMENTS evidencing such claims.

13 RESPONSE TO INTERROGATORY NO. 25:

14 Unknown. Defendant has conducted a diligent search and a
15 reasonable inquiry in an attempt to respond to this interrogatory.
16 Defendant is unable to determine whether any such claims were made.

17 INTERROGATORY NO. 26:

18 Does THIS DEFENDANT have insurance available to cover
19 judgment(s) entered against it in asbestos-related personal injury
20 lawsuits? If so, state:

- 21 A. The name and principal place of business of any
22 insurance carrier who has issued such policy of insurance;
23 B. The number and effective date of each policy;
24 C. The amount(s) of coverage of each policy;
25 D. The applicable dates of coverage.

26 RESPONSE TO INTERROGATORY NO. 26:

27 Yes. Defendant SVI has adequate insurance coverage for

1 any judgment(s) entered against it in the actions pending against
2 it.

3 INTERROGATORY NO. 27:

4 State whether YOU have controlled, purchased, or in any way
5 acquired any controlling interest in any corporation or business
6 entity which has mined, manufactured, produced, processed,
7 compounded, sold, supplied, distributed and/or otherwise placed RAW
8 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce.
9 If so, state:

10 A. The name and address of said corporation or
11 business entity;

12 B. The dates YOU controlled, purchased or acquired any
13 interest; and

14 C. The nature of the business as it pertains to
15 asbestos.

16 RESPONSE TO INTERROGATORY NO. 27:

17 - No.

18 INTERROGATORY NO. 28:

19 State whether THIS DEFENDANT, between 1930 and 1985, has ever
20 engaged in the following activities with regard to RAW ASBESTOS, and
21 if so, state the inclusive dates of such activity:

22 A. Mining;

23 B. Milling;

24 C. Supply;

25 D. Importing;

26 E. Processing;

27 F. Distribution;

- 1 G. Marketing;
2 H. Sale;
3 I. Brokering.

4 RESPONSE TO INTERROGATORY NO. 28:

- 5 A. No.
6 B. No.
7 C. No.
8 D. No.
9 E. No.
10 F. No.
11 G. No.
12 H. No.
13 I. No.

14 INTERROGATORY NO. 29:

15 If YOUR answer to any of subparts of Interrogatory 28
16 regarding RAW ASBESTOS is in the affirmative, state:

17 A. The trade, brand name, and/or generic name of such
18 RAW ASBESTOS milled or MARKETED in any form or quantity between 1930
19 and 1985;

20 B. The date(s) such RAW ASBESTOS was first placed on
21 the market, including the date(s) such RAW ASBESTOS was first
22 marketed;

- 23 1. On an experimental basis;
24 2. On a test basis;
25 3. For sale.

26 C. The date(s) such RAW ASBESTOS:
27 1. Ceased to be produced; or

1 2. Was recalled from the market, if ever.

2 D. A description of the chemical composition of such
3 RAW ASBESTOS, including the type and/or grade of asbestos;

4 E. A description of the physical appearance and nature
5 of such RAW ASBESTOS, including any color coding, distinctive
6 marking and/or logo on the packaging or container;

7 F. A detailed description of the intended use of such
8 RAW ASBESTOS, including any temperature limits for each such use;

9 G. Whether such RAW ASBESTOS was on the U.S.
10 Government's "Qualified Products List," and if so, the inclusive
11 dates it was on such list;

12 H. IDENTIFY to whom such RAW ASBESTOS has, at any
13 time, been sold. As to each such, state:

14 I. Whether any of THIS DEFENDANT's RAW ASBESTOS has,
15 at any time, been sold, shipped, or otherwise distributed, used or
16 installed to or at any COMPANY (including power company or utility),
17 governmental agency or entity, shipyard, distributor, refinery,
18 contractor, supplier, PREMISE owner or occupant, ship owner, or
19 other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS
20 DEFENDANT's RAW ASBESTOS has at any time, been sold to any
21 manufacturer, or manufacturing facility, of ASBESTOS-CONTAINING
22 PRODUCTS. If so, state:

23 1. The names of each such COMPANY, governmental
24 agency or entity, shipyard, distributor, supplier, manufacturer or
25 refinery;

26 2. The inclusive dates of each such sale, and the
27 amount (quantity) and the trade brand name of such RAW ASBESTOS

1 sold;

2 3. The manner of shipment (e.g. boat, rail,
3 etc.).

4 4. Whether you have any records indicating any
5 such sale or shipment and, if so, the name, address and job
6 classification of each person who currently has possession of such
7 records.

8 5. Either (1) attach all DOCUMENTS evidencing the
9 information sought in this Interrogatory and its subparts to your
10 answers to these Interrogatories, or (2) attach disks containing
11 such data, or (3) describe such DOCUMENTS with sufficient
12 particularity that they may be made the subject of a request for
13 production of documents.

14 RESPONSE TO INTERROGATORY NO. 29:

15 Not applicable.

16 INTERROGATORY NO. 30:

17 Between 1930 and 1985, did YOU ever engage in any of the
18 activities listed below with regard to ASBESTOS-CONTAINING PRODUCTS?
19 If so, state the inclusive dates of such activity:

- 20 A. Supply;
- 21 B. Importing;
- 22 C. Distribution;
- 23 D. Marketing;
- 24 E. Sale;
- 25 F. Labeling;
- 26 G. Manufacturing;
- 27 H. Brokering.

1 RESPONSE TO INTERROGATORY NO. 30:

2 A. Defendant used asbestos-containing products in its
3 activities in providing services as a contractor on hundreds of
4 projects which called for insulation materials for insulating
5 piping, equipment, structural steel and the like during the period
6 1945 until about 1972. Defendant contends that its use of asbestos-
7 containing products did not constitute "supply", "distribution",
8 "marketing" or "sale" of asbestos-containing products. Wherever the
9 insulation material was installed that contained asbestos, the
10 asbestos product originated from a company which sold, supplied or
11 distributed asbestos to Defendant, not from Defendant.

12 B. No.

13 C. See A, above.

14 D. See A, above.

15 E. See A, above.

16 F. No.

17 G. No.

18 H. No.

19 INTERROGATORY NO. 31:

20 If your answer to any subpart of Interrogatory No. 31
21 regarding "ASBESTOS-CONTAINING PRODUCTS" is in the affirmative,
22 state:

23 A. The trade, brand name, and/or generic name of each
24 such ASBESTOS-CONTAINING PRODUCT MARKETED in any form or quantity
25 between 1930 and 1985;

26 B. The date(s) each such ASBESTOS-CONTAINING PRODUCT
27 was first placed on the market, including the date(s) each such

1 ASBESTOS-CONTAINING PRODUCT was first MARKETED;

2 1. On an experimental basis;

3 2. On a test basis; or

4 3. For sale.

5 C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

6 1. Ceased to be produced; or

7 2. Was recalled from the market, if ever.

8 D. A detailed description of the chemical composition
9 of each such ASBESTOS-CONTAINING PRODUCT, including the type and/or
10 grade of asbestos and/or asbestos fiber contained in each such
11 product and the quantitative percentage of asbestos or asbestos
12 fiber in each such product, and all non-asbestos components of the
13 ASBESTOS-CONTAINING PRODUCT, and if the chemical composition changed
14 over time, the inclusive dates of each formulation;

15 E. A description of the physical appearance and nature
16 of each such ASBESTOS-CONTAINING PRODUCT, including any color
17 coding, distinctive marking and/or logo, either on the product or on
18 the packaging;

19 F. A detailed description of the intended use of each
20 such ASBESTOS-CONTAINING PRODUCT, including any temperature limits
21 for each such use;

22 G. Whether any such ASBESTOS-CONTAINING PRODUCT was on
23 the U.S. Government's "Qualified Products List," and if so, the
24 inclusive dates it was on such list;

25 H. The name and address of the supplier of the RAW
26 ASBESTOS used in each such product and the time period of such
27 supply;

1 I. Whether any of THIS DEFENDANT's RAW ASBESTOS OR
2 ASBESTOS-CONTAINING PRODUCTS have, at any time, been sold, shipped,
3 or otherwise distributed to any COMPANY (including power company or
4 utility), governmental agency or entity, shipyard, distributor,
5 refinery, contractor, supplier, manufacturer, PREMISE owner or
6 occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC
7 AREA. If so, state:

8 1. The names of each such COMPANY, governmental
9 agency or entity, shipyard, distributor, supplier, manufacturer,
10 refinery, contractor, PREMISE owner or occupant, ship owner, PREMISE
11 or site;

12 2. The inclusive dates of each such sale,
13 shipment, distribution, use or installation and the amount (volume)
14 and the trade or brand name of each such ASBESTOS-CONTAINING PRODUCT
15 sold;

16 3. Whether you have any records indicating any
17 such sale, shipment, distribution, use or installation and, if so,
18 the name, address and job classification of each person who
19 currently has possession of such records.

20 J. Either (1) attach all DOCUMENTS evidencing the
21 information sought in this Interrogatory and its subparts to your
22 answers to these Interrogatories, or (2) attach disks containing
23 such data, or (3) describe such DOCUMENTS with sufficient
24 particularity that they may be made the subject of a request for
25 production of documents.

26 RESPONSE TO INTERROGATORY NO. 31:

27 See response to Interrogatory No. 30.

1 INTERROGATORY NO. 32 (PREMISES DEFENDANTS only)

2 Did YOU install, remove, or handle or contract to have others
3 install, remove, or handle RAW ASBESTOS or ASBESTOS-CONTAINING
4 PRODUCTS at any PREMISES in the GEOGRAPHIC AREA which PREMISES is at
5 issue as to YOU in San Francisco Superior Court asbestos litigation
6 as of the date of your answers to these interrogatories? If so:

7 A. IDENTIFY the PREMISES.

8 B. For each of the PREMISES:

- 9 1. State the nature of your ownership or
10 possessory interest;
11 2. State the inclusive date of that interest;
12 3. IDENTIFY the party from whom that interest was
13 acquired;
14 4. IDENTIFY the party, if any, to whom that
15 interest was transferred.

16 C. IDENTIFY every contract to which YOU were a party
17 or of which you have knowledge wherein the performance of such
18 contract involved the installation, removal, disturbing or handling
19 of any RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at YOUR
20 PREMISES. For each such contract:

- 21 1. IDENTIFY the parties to the contract;
22 2. Provide a general description and specific
23 location of the work to be performed by each party to the contract;
24 3. IDENTIFY and describe the NATURE of the RAW
25 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed,
26 disturbed or handled in the performance of the contract;
27 4. State the dates of the contract and the dates

1 of performance;

2 D. Except as provided in response to subpart (c), has
3 any work other than routine maintenance been done on or to the
4 PREMISES that involved the installation, removal, disturbing or
5 handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so,
6 for each such instance:

7 1. State the inclusive dates of the work;

8 2. Provide a general description and specific
9 location of the work;

10 3. State whether the work was done by YOU and/or
11 YOUR employees;

12 4. IDENTIFY and describe the NATURE of the RAW
13 ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, handled
14 or disturbed;

15 5. IDENTIFY from whom the RAW ASBESTOS OR
16 ASBESTOS-CONTAINING PRODUCTS were acquired.

17 - E. Has any asbestos abatement effort been made at the
18 PREMISES? If so, for each such effort:

19 1. IDENTIFY who did the work;

20 2. State the inclusive dates thereof;

21 3. State whether samples were taken, and, if the
22 samples still exist, IDENTIFY the custodian of the samples;

23 4. State whether any material was tested, and, if
24 so, what were the results of each test;

25 5. IDENTIFY each test result with sufficient
26 particularity for purposes of a request for production of documents,
27 or, in the alternative, attach a copy to YOUR answers to these

1 interrogatories.

2 F. Except for insurance coverage litigation, have you
3 filed suit against, or otherwise sought to recover from, any person
4 or entity for some or all of the cost of asbestos abatement or for
5 the property damage allegedly caused by the presence of RAW ASBESTOS
6 or ASBESTOS-CONTAINING PRODUCTS on the PREMISES identified in
7 response to subpart (A) above? If so:

8 1. IDENTIFY the person or entity against whom YOU
9 have filed suit or otherwise sought to recover;

10 2. If YOU have filed suit, state the court in
11 which the action was filed, the date on which it was filed, IDENTIFY
12 all Plaintiffs and Defendants and their counsel of record;

13 3. State whether or not the case has been
14 resolved, and, if so, what was the status or disposition.

15 G. Either (1) attach all DOCUMENTS evidencing the
16 information sought in this Interrogatory and its subparts to your
17 answers to these Interrogatories, or (2) attach disks containing
18 such data, or (3) describe such DOCUMENTS with sufficient
19 particularity that they may be made the subject of a request for
20 production of documents.

21 H. IDENTIFY the person(s) presently most knowledgeable
22 about the information sought in this interrogatory or its subparts.

23 RESPONSE TO INTERROGATORY NO. 32:

24 A. Yes. 50 Beale Street, San Francisco, California;
25 425 Market Street, San Francisco, California.

26 B. 50 Beale Street
27

1 Defendant had a full or partial ownership interest in the
2 PREMISES existing at 50 Beale Street from January, 1966 to March 2,
3 1983. Defendant owned an interest in the PREMISES from its initial
4 construction beginning in January, 1966 and did not acquire an
5 interest in the PREMISES from any person or party. Defendant
6 transferred its interest in the PREMISES to Bechtel Investments,
7 Inc.

8 425 Market Street

9 Defendant leased space on floors 32 through 36 of the
10 PREMISES at 425 Market Street from 425 Market Street Associates from
11 October, 1973 to March, 1984. Defendant leased space on floors 29
12 through 31 of the PREMISES at 425 Market Street from 425 Market
13 Street Associates from October, 1973 to March, 1979. Defendant is
14 also informed and believes that it subleased space on floors 26 and
15 27 of the PREMISES at 425 Market Street from an unknown sublessor
16 for an unknown period sometime between October, 1973 and March,
17 1979. Defendant transferred its lease interest in the PREMISES to
18 425 Market Street Associates at the times indicated in this
19 response.

20 C. 50 Beale Street

21 Defendant is aware that, during the period that it owned
22 or occupied the PREMISES at 50 Beale Street, certain contracts were
23 let, either between Defendant and various contractors or between
24 other entities and various contractors, for maintenance,
25 improvement, or other construction work at the PREMISES. Some of
26 this maintenance, improvement or other construction work may have
27 involved the installation, removal, disturbing or handling of

1 ASBESTOS-CONTAINING PRODUCTS. Without reference to the specific
2 contracts involved, Defendant does not have knowledge as to who the
3 parties to these contracts were, what type of work was performed,
4 where within the PREMISES the work was performed, the nature of any
5 ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or
6 handled, if any, or the date(s) of the performance of this work.
7 Defendant may or may not have in its possession or control some of
8 the contracts relating to this work. However, Defendant's records
9 are not organized in any way that enables Defendant to determine
10 whether it has any such contracts in its possession or control
11 unless Defendant is provided information identifying the specific
12 contractors who performed maintenance, improvement or other
13 construction work at the PREMISES. Defendant is informed and
14 believes that the various plaintiffs' asbestos personal injury
15 counsel are in possession information relating to the identities of
16 the employers of their clients and others who worked at the PREMISES
17 and, in fact, plaintiffs' counsel are more knowledgeable than
18 Defendant regarding the identities of these contractors. If
19 plaintiffs' asbestos counsel identifies specific contractors claimed
20 to have performed maintenance, improvement or other construction
21 work at the PREMISES Defendant will be able to undertake a search
22 for any contracts requested in this interrogatory.

23 425 Market Street

24 During the period that Defendant leased space at the
25 PREMISES at 425 Market Street, certain contracts may have been let,
26 either between Defendant and various contractors or between other
27 entities and various contractors, for maintenance, improvement, or

1 other construction work at the PREMISES. Some of this maintenance,
2 improvement, or other construction work may have involved the
3 installation; removal, disturbing or handling of ASBESTOS-CONTAINING
4 PRODUCTS. Without reference to the specific contracts involved,
5 Defendant does not have knowledge as to who the parties to these
6 contracts were, what type of work was performed, where within the
7 PREMISES the work was performed, the nature of any ASBESTOS-
8 CONTAINING PRODUCTS installed, removed, disturbed or handled, if
9 any, or the date(s) of the performance of this work. Defendant may
10 or may not have in its possession or control some of the contracts
11 relating to this work. However, Defendant's records are not
12 organized in any way that permits Defendant to determine whether it
13 has any such contracts in its possession or control unless Defendant
14 is provided with information identifying the specific contractors
15 who performed maintenance, improvement or other construction work at
16 the PREMISES. Defendant is informed and believes that the various
17 plaintiffs' asbestos personal injury counsel are in possession
18 information relating to the identities of the employers of their
19 clients and others who worked at the PREMISES and, in fact,
20 plaintiffs' counsel are more knowledgeable than Defendant regarding
21 the identities of these contractors. If plaintiffs' asbestos
22 counsel identifies specific contractors claimed to have performed
23 maintenance, improvement or other construction work at the PREMISES
24 Defendant will be able to undertake a search for any contracts
25 requested in this interrogatory.

26 D. The response to this interrogatory would
27 necessitate the preparation or making of a compilation, abstract,

1 audit, or summary of or from documents relating to work other than
2 routine maintenance at the PREMISES at 50 Beale Street and 425
3 Market Street, the burden and expense of which would be
4 substantially the same for plaintiffs as it would be for Defendant.
5 Therefore, pursuant to California Code of Civil Procedure section
6 2030(f)(2), Defendant elects to afford plaintiffs a reasonable
7 opportunity to inspect and copy documents relating to work other
8 than routine maintenance at the PREMISES at 50 Beale Street and 425
9 Market Street.

10 E. 50 Beale Street

11 The response to this interrogatory would necessitate the
12 preparation or making of a compilation, abstract, audit, or summary
13 of or from documents relating to the abatement of asbestos-
14 containing products from the PREMISES at 50 Beale Street, the burden
15 and expense of which would be substantially the same for plaintiffs
16 as it would be for Defendant. Therefore, pursuant to California
17 Code of Civil Procedure section 2030(f)(2), Defendant elects to
18 afford plaintiffs a reasonable opportunity to inspect and copy
19 documents relating to asbestos abatement at the PREMISES at 50 Beale
20 Street.

21 425 Market Street

22 Defendant is unaware of any asbestos abatement at the
23 PREMISES at 425 Market Street.

24 F. No.

25 G. See response to subparts C, D, and E above.

26 H. Please refer to documents made available to
27 plaintiffs' counsel pursuant to subparts C, D, and E above.

1 INTERROGATORY NO. 33 (CONTRACTOR DEFENDANTS only)

2 At any time between 1930 and 1985, did YOU hold a contractor's
3 license in the State of California? If so:

4 A. IDENTIFY each license by type, date and number.

5 B. If on the date of your answers YOU are a defendant
6 in four or more asbestos actions in San Francisco Superior Court,
7 IDENTIFY each job or contract that YOU performed (directly or
8 through one or more subcontractors) during this time period for work
9 in any PREMISES which is at issue as to YOU on such date, and in any
10 PREMISES of 50,000 square feet or more in the GEOGRAPHIC AREA which
11 job or contract involved installation, removal, disturbing or
12 handling RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS.

13 (Alternatively, at your option, you may IDENTIFY each job or
14 contract YOU performed (directly or through one or more
15 subcontractors) during this time frame for all work, or for all work
16 on PREMISES of 50,000 square feet or more, in the GEOGRAPHIC AREA.)

17 As to each such job or contract:

18 1. IDENTIFY the location (including name of ship,
19 if applicable) where the job or work was performed;

20 2. State the date of the contract or the
21 inclusive dates of the work;

22 3. IDENTIFY the person or entity with whom you
23 contracted;

24 4. State your job or contract number.

25 C. If on the date of your answers you are not a
26 defendant in four or more asbestos actions in San Francisco Superior
27 Court, IDENTIFY each job or contract that YOU performed (directly or

1 through one or more subcontractors) during this time period for work
2 in any PREMISES which is at issue as to YOU on such date. As to each
3 such job or contract:

4 1. IDENTIFY the location (including name of ship,
5 if applicable) where the job or work was performed;

6 2. State the date of the contract or the
7 inclusive dates of the work;

8 3. IDENTIFY the person or entity with whom you
9 contracted;

10 4. State your job or contract number.

11 RESPONSE TO INTERROGATORY NO. 33:

12 A. Yes. At all relevant times Defendant held a
13 California contractor's license.

14 B. Defendant identifies the following jobs for
15 construction work it performed in PREMISES which are at issue as to
16 it as of June 2, 1997, based upon Defendants' review of plaintiffs'
17 complaints, preliminary fact sheets, and General Order 29 and 129
18 interrogatory responses:

Location	Client	Job # Opened	Job # Closed	Job#
EUREKA, CA	PACIFIC GAS&ELEC	4509	4511	1001
RICHMOND, CA	STANDARD OIL OF CALIF	4510	4601	1027
RICHMOND, CA	STANDARD OIL OF CALIF	4511	4903	1030
PITTSBURG, CA	DOW CHEMICAL CO	4511	4601	1031
AVON, CA	TIDEWATER	4602	4711	1034
RICHMOND, CA	STANDARD OIL OF CALIF	4511	4601	1041

1	LOS ANGELES, CA	UNOCAL	4512	4602	1042
2	RICHMOND, CA	STANDARD OIL OF CALIF	4601	4609	1056
3	SAN FRANCISCO, CA	PACIFIC GAS&ELEC	4602	4701	1098
4	MARTINEZ, CA	SHELL CHEMICAL	4702	4707	1152
5	RICHMOND, CA	STANDARD OIL OF CALIF	4604	4607	1158
6	RICHMOND, CA	STANDARD OIL OF CALIF	4605	4608	1177
7	AVON, CA	TIDEWATER	4610	4704	1186
8	RICHMOND, CA	STANDARD OIL OF CALIF	4608	4610	1197
9	RICHMOND, CA	STANDARD OIL OF CALIF	4610	4803	1239
10	RICHMOND, CA	STANDARD OIL OF CALIF	4610	4702	1253
11	RICHMOND, CA	STANDARD OIL OF CALIF	4612	4612	1264
12	SHELL CHEMICAL	SAN FRANCISCO, CA	4701	4710	1298
13	MARTINEZ, CA	SHELL CHEMICAL	4701	4711	1303
14	RICHMOND, CA	STANDARD OIL OF CALIF	4703	4709	1321
15	MARTINEZ, CA	SHELL OIL CO.	4709	4803	1329
16	HERCULES, CA	HERCULES POWDER	4709	4710	1353
17	RICHMOND, CA	STANDARD OIL OF CALIF	4803	4903	1408
18	ANTIOCH, CA	PACIFIC GAS&ELEC	4809	5312	1430
19	RICHMOND, CA	STANDARD OIL OF CALIF	4807	4902	1437
20	RICHMOND, CA	STANDARD OIL OF CALIF	4902	4910	1514
21	RICHMOND, CA	STANDARD OIL OF CALIF	4511	4906	1555
22	RICHMOND, CA	STANDARD OIL OF CALIF	4910	5003	1591
23	HERCULES, CA	HERCULES POWDER	4911	4912	1608
24	RICHMOND, CA	STANDARD OIL OF CALIF	5006	5204	1657
25	SAN FRANCISCO, CA	PACIFIC GAS&ELEC	5005	5105	1658
26	AVON, CA	TIDEWATER	5008	5009	1692
27	ANTIOCH, CA	PACIFIC GAS&ELEC	5103	5310	1729

1	RICHMOND, CA	STANDARD OIL OF CALIF	5101	5101	1750
2	MARTINEZ, CA	SHELL CHEMICAL	5103	5109	1759
3	MARTINEZ, CA	SHELL CHEMICAL	5104	5111	1801
4	AVON, CA	TIDEWATER	5106	5107	1822
5	EMERYVILLE	UNOCAL	5112	5205	1846
6	PITTSBURG, CA	PACIFIC GAS&ELEC	5109	5412	1852
7	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5110	1862
8	MARTINEZ, CA	SHELL CHEMICAL	5202	5209	1864
9	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5207	1869
10	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5206	1874
11	RICHMOND, CA	STANDARD OIL OF CALIF	5112	5204	1876
12	MARTINEZ, CA	SHELL CHEMICAL	5205	5210	1888
13	ANTIOCH, CA	PACIFIC GAS&ELEC	5301	5312	1914
14	AVON, CA	TIDEWATER	5205	5306	1928
15	RICHMOND, CA	STANDARD OIL OF CALIF	5205	5208	1945
16	RICHMOND, CA	STANDARD OIL OF CALIF	5207	5305	2002
17	AVON, CA	TIDEWATER	5306	5307	2023
18	HERCULES, CA	HERCULES POWDER	5303	5311	2034
19	MORRO BAY, CA	PACIFIC GAS&ELEC	5301	5603	2050
20	OLEUM/RODEO, CA	UNOCAL	5311	5504	2075
21	OLEUM/RODEO, CA	UNOCAL	5402	5411	2104
22	AVON, CA	TIDEWATER	5312	5409	2133
23	LOS ANGELES, CA	UNOCAL	5402	5405	2138
24	RICHMOND, CA	STANDARD OIL OF CALIF	5404	5504	2160
25	BUHNE PT, EUREKA, CA	PACIFIC GAS&ELEC	5405	5612	2200
26	PITTSBURG, CA	DOW CHEMICAL CO	5505	5601	2208
27	AVON, CA	TIDEWATER	5408	5411	2223

1	AVON, CA	TIDEWATER	5412	5611	2285
2	LOS ANGELES, CA	UNOCAL	5502	5602	2288
3	MOSS LANDING	PACIFIC GAS&ELEC	5509	5611	2295
4	PITTSBURG, CA	PACIFIC GAS&ELEC	5501	5506	2303
5	RICHMOND, CA	STANDARD OIL OF CALIF	5503	5604	2331
6	RICHMOND, CA	STANDARD OIL OF CALIF	5504	5604	2352
7	PITTSBURGH, CA	DOW CHEMICAL	5603	5706	2503
8	AVON, CA	TIDEWATER	5601	5603	2446
9	AVON, CA	TIDEWATER	5604	5809	2515
10	LONG BEACH, CA	ATLANTIC RICHFIELD	5604	5609	2526
11	RICHMOND, CA	STANDARD OIL OF CALIF	5702	5709	2531
12	BUHNE PT, EUREKA, CA	PACIFIC GAS&ELEC	5612	5809	2535
13	RICHMOND, CA	STANDARD OIL OF CALIF	5705	5806	2685
14	RICHMOND, CA	STANDARD OIL OF CALIF	5706	5803	2829
15	MORRO BAY, CA	PACIFIC GAS&ELEC	5804	5809	2889
16	BUHNE PT, EUREKA, CA	PACIFIC GAS&ELEC	5804	6201	2956
17	RICHMOND, CA	STANDARD OIL OF CALIF	5812	5907	3173
18	CROCKETT, CA	C & H SUGAR	5904	5906	3207
19	RICHMOND, CA	STANDARD OIL OF CALIF	5709	6001	3310
20	HERCULES, CA	HERCULES POWDER	6005	6012	3438
21	RICHMOND, CA	STANDARD OIL OF CALIF	6004	6103	3508
22	AVON, CA	TIDEWATER	6104	6404	3700
23	MARTINEZ, CA	SHELL OIL CO.	6103	6109	3789
24	RICHMOND, CA	STANDARD OIL OF CALIF	6102	6106	3792
25	RICHMOND, CA	STANDARD OIL OF CALIF	6103	6107	3840
26	RICHMOND, CA	STANDARD OIL OF CALIF	6107	6107	3973
27	RICHMOND, CA	STANDARD OIL OF CALIF	6204	6210	4210

1	RICHMOND, CA	CHEVRON OIL/CHEM	6408	6512	5191
2	RICHMOND, CA	STANDARD OIL OF CALIF	6409	6604	5232
3	SAN ONOFRE, CA	SAN DIEGO GAS&EL	6412	6604	5245
4	HERCULES, CA	HERCULES POWDER	6410	6709	5301
5	OLEUM/RODEO, CA	UNOCAL	6502	6512	5466
6	SAN ONOFRE, CA-	SO CALIF EDISON	6508	6601	5668
7	RICHMOND, CA	CHEVRON OIL/CHEM	6601	6707	5845
8	RICHMOND, CA	STANDARD OIL OF CALIF	6606	6611	6163
9	RICHMOND, CA	CHEVRON OIL/CHEM	6705	6808	6603
10	PITTSBURG, CA	DOW CHEMICAL CO	6709	6710	6899
11	OLEUM/RODEO, CA	UNOCAL	6808	7202	7299
12	SAN ONOFRE, CA	SO CALIF EDISON	6911	7001	8445
13	SAN ONOFRE, CA	SO CALIF EDISON	7008	7010	9008
14	OLEUM/RODEO, CA	UNOCAL	7203	7305	10000
15	SAN ONOFRE, CA	SO CALIF EDISON	7210	8412	10079
16	RICHMOND, CA	STANDARD OIL OF CALIF	7305	7702	10640
17	RODEO, CA	UNOCAL	7809	8012	13237
18	RICHMOND, CA	CHEVRON USA	8005	8812	14216
19	RICHMOND, CA	CHEVRON USA	8105	8309	14836
20	SAN FRANCISCO, CA	PACIFIC GAS&ELEC	8203	8603	15320
21	SAN ONOFRE, CA	SO CALIF EDISON	8211	9412	15692
22	AVON, CA	TOSCO CORP.	8212	8307	15773
23	AVILA BEACH, CA	PACIFIC GAS&ELEC	8203	8710	16293
24	CARSON, CA	ARCO PETR PRODUCTS	8402	8607	16494
25	SAN ONOFRE, CA	SO CALIF EDISON	8404	9005	16859

As to each PREMISE which is not at issue as to Defendant,

1 Defendant objects to providing identifying information regarding its
2 jobs or contracts on the following grounds:

- 3 1. The information requested does not relate to a
4 current case or controversy;
- 5 2. The interrogatory is overly broad and calls for
6 information which is neither relevant to the
7 subject matter of pending actions nor reasonably
8 calculated to lead to the discovery of admissible
9 evidence;
- 10 3. The interrogatory amounts to an impermissible
11 shifting of the burden of proof;
- 12 4. The court's imposition of this interrogatory and
13 its denial of defendant's right to object is beyond
14 the Court's rule-making authority.

15 INTERROGATORY NO. 34:

16 Did any of the distributors identified in your Answer to
17 Interrogatory Nos. 29 and 31 above have an exclusive
18 distributorship? If so, state the relevant time period.

19 RESPONSE TO INTERROGATORY NO. 34:

20 Not applicable.

21 INTERROGATORY NO. 35:

22 If THIS DEFENDANT entered into any agreements for the
23 rebranding of any ASBESTOS-CONTAINING PRODUCTS by THIS DEFENDANT for
24 resale or distribution by another person or entity, describe each
25 agreement's terms and the parties to said agreement, the duration of
26 the agreement, and name of each product(s) and/or material(s)
27 covered by each such agreement.

1 RESPONSE TO INTERROGATORY NO. 35:

2 Not applicable.

3 INTERROGATORY NO. 36:

4 If THIS DEFENDANT entered into any agreements for the
5 rebranding of ASBESTOS-CONTAINING PRODUCTS manufactured, sold,
6 supplied or distributed by another person or entity for resale or
7 distribution by YOU, describe each of the agreements and the parties
8 to said agreement, the terms, the duration, and the names of each
9 product(s) and/or material(s) covered by each such agreement.

10 RESPONSE TO INTERROGATORY NO. 36:

11 Not applicable.

12 INTERROGATORY NO. 37:

13 As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING
14 PRODUCT listed in YOUR responses to Interrogatories No. 29 and 31
15 did DEFENDANT warn of the health hazards of asbestos? If so, state
16 for each such warning:

17 A. The content, size, color, and location; whether the
18 warning appeared on the material and/or on the container, and/or was
19 placed on a tag; whether the warning was included in contracts;
20 whether the warning was included in advertising or other promotional
21 materials.

22 B. State whether you have any photographs thereof;

23 C. The inclusive dates on which you used each such
24 warning;

25 D. State all changes you made in such warnings and the
26 dates of such changes; and

27 E. Identify the person most knowledgeable about your

1 warnings and warning policy.

2 RESPONSE TO INTERROGATORY NO. 37:

3 Not applicable.

4 INTERROGATORY NO. 38:

5 With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS,
6 state whether THIS DEFENDANT's name, a trademark, logos, color
7 coding, or other identifying markings ever appeared on the actual
8 product itself. If so, IDENTIFY each such product, state when the
9 practice to place such identifying markings upon the product was
10 begun and when it ended, if applicable, and describe in detail the
11 pertinent marking(s) and the purpose, if any, of such markings.

12 RESPONSE TO INTERROGATORY NO. 38:

13 Not applicable.

14 INTERROGATORY NO. 39:

15 Between the years 1930 to 1985, did THIS DEFENDANT purchase or
16 otherwise acquire any ASBESTOS-CONTAINING PRODUCT lines from another
17 person or entity? If so, state for each such purchase:

18 A. Date of purchase or acquisition;

19 B. Terms of purchase or acquisition agreement;

20 C. Either (1) attach all DOCUMENTS evidencing said
21 acquisition, or (2) attach disks containing such data, or (3)
22 describe such DOCUMENTS with sufficient particularity that they may
23 be made the subject of a request for production of documents;

24 D. Trade, brand, and/or generic name of each such
25 product line so acquired;

26 E. Name of the person or entity from whom YOU
27 purchased or acquired each such ASBESTOS-CONTAINING PRODUCT line;

1 and

2 F. Location of any manufacturing facilities so
3 acquired, and the type of ASBESTOS-CONTAINING PRODUCTS manufactured
4 therein.

5 RESPONSE TO INTERROGATORY NO. 39:

6 No.

7 INTERROGATORY NO. 40:

8 Between the years 1930 to 1985, did THIS DEFENDANT sell any
9 ASBESTOS-CONTAINING PRODUCT line to another person or entity? If so,
10 state for each such sale:

11 A. Date of sale;

12 B. Terms of sales agreement;

13 C. Either (1) attach all DOCUMENTS evidencing said
14 sale, or (2) attach disks containing such data, or (3) describe such
15 DOCUMENTS with sufficient particularity that they may be made the
16 subject of a request for production of documents;

17 D. Trade, brand, and/or generic name of each such
18 product line sold;

19 E. Name of person or entity to whom you sold each such
20 ASBESTOS-CONTAINING PRODUCTS line; and

21 F. Location of any manufacturing facilities so sold,
22 and the type of ASBESTOS-CONTAINING PRODUCTS manufactured therein.

23 RESPONSE TO INTERROGATORY NO. 40:

24 No.

25 INTERROGATORY NO. 41:

26 IDENTIFY all brochures, pamphlets, catalogs or other
27 advertising relating to ASBESTOS-CONTAINING PRODUCTS and/or RAW

1 ASBESTOS which THIS DEFENDANT manufactured, sold, distributed or
2 supplied from the year 1930 to 1985. For each such document, state:

- 3 A. A description of the document;
- 4 B. The year it was printed;
- 5 C. The period of time in which it was used;
- 6 D. The purpose of such document;
- 7 E. Whether the documents or copies of said documents
8 presently exist;
- 9 F. If said documents or copies still exist, where they
10 are located; and
- 11 G. The IDENTITY of the custodian of such documents.

12 RESPONSE TO INTERROGATORY NO. 41:

13 Not applicable.

14 INTERROGATORY NO. 42:

15 State if YOU have or had within YOUR corporate or other
16 business structure any CONTRACT UNITS.

17 RESPONSE TO INTERROGATORY NO. 42:

18 No.

19 INTERROGATORY NO. 43:

20 State whether or not any of YOUR CONTRACT UNITS installed
21 and/or removed RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in
22 the GEOGRAPHIC AREA at any time between 1930 and 1985. If so:

- 23 A. State the business addresses and name of the
24 CONTRACT UNIT;
- 25 B. State the inclusive periods of time the CONTRACT
26 UNITS were working in the GEOGRAPHIC AREA;
- 27 C. State the name and address of each job site within

1 the GEOGRAPHIC AREA and the dates the CONTRACT UNIT worked at those
2 job sites, and, IDENTIFY the RAW ASBESTOS and/or ASBESTOS-CONTAINING
3 PRODUCTS installed or removed on each occasion;

4 D. Either (1) attach all DOCUMENTS evidencing the
5 information sought in this Interrogatory and its subparts to your
6 answers to these Interrogatories, or (2) attach disks containing
7 such data, or (3) describe such DOCUMENTS with sufficient
8 particularity that they may be made the subject of a request for
9 production of documents.

10 RESPONSE TO INTERROGATORY NO. 43:

11 Not applicable.

12 INTERROGATORY NO. 44:

13 When do YOU contend that THIS DEFENDANT first became aware
14 that there is an association between asbestos exposure and disease
15 in human beings?

16 RESPONSE TO INTERROGATORY NO. 44:

17 Defendant has conducted a diligent search and reasonable
18 inquiry in an attempt to respond to this interrogatory. Defendant
19 is unable to determine when it "first learned of hazards associated
20 with asbestos exposure." At the relevant times, Defendant was a
21 large company with tens of thousands of employees located in offices
22 and on projects throughout the United States and abroad. Defendant
23 was an engineering and construction company engaged in the design
24 and construction of large industrial facilities. Defendant was
25 never a manufacturer or supplier of asbestos-containing products.

26 Defendant has not been able to determine a specific date
27 in response to this interrogatory, because it is not feasible to

1 interview thousands of employees and prior employees regarding this
2 issue. However, Defendant has determined that an article was
3 published in the April 2, 1970 edition of a magazine called
4 Engineering News Record (ENR) entitled "Loose Asbestos Fiber Seen as
5 Cancer Threat to Men in Building Trades". ENR was a bi-weekly trade
6 magazine read by many engineering professionals, such as those
7 employed by Defendant. Defendant believes that it is likely that
8 some Defendant employees may have read the ENR article noted above.

9 With the advent of OSHA regulations in 1972, information
10 was available to contractors such as Defendant that safety
11 precautions were necessary for persons working in close proximity to
12 asbestos-containing materials.

13 INTERROGATORY NO. 45:

14 How do YOU contend that THIS DEFENDANT first became aware that
15 there is an association between asbestos exposure and disease in
16 human beings.

17 RESPONSE TO INTERROGATORY NO. 45:

18 See Response to Interrogatory No. 44, fully incorporated
19 herein by reference.

20 INTERROGATORY NO. 46:

21 Either (1) attach all DOCUMENTS evidencing the information
22 upon which YOUR contentions in YOUR answers to Interrogatories No.
23 44 and No. 45 are based, or (2) attach disks containing such data,
24 or (3) describe such DOCUMENTS with sufficient particularity that
25 they may be made the subject of a request for production of
26 documents.

27 ///

1 RESPONSE TO INTERROGATORY NO. 46:

2 See Response to Interrogatory No. 44.

3 INTERROGATORY NO. 47:

4 When did THIS DEFENDANT first warn its employees that exposure
5 to asbestos could be hazardous to human health? State:

6 A. Whether the first such warning was written or oral;

7 B. Whether copies of DOCUMENTS containing such warning
8 exist;

9 C. The IDENTITY of the custodian of such DOCUMENTS;

10 D. The content of the warning.

11 RESPONSE TO INTERROGATORY NO. 47:

12 Defendant has conducted a diligent search and reasonable
13 inquiry in an attempt to respond to this interrogatory. Defendant
14 is unable to determine when it first warned of hazards associated
15 with asbestos exposure. At the relevant times, Defendant was a
16 large company with tens of thousands of employees located in offices
17 and on projects throughout the United States and abroad. Defendant
18 was an engineering and construction company engaged in the design
19 and construction of large industrial facilities. Defendant was
20 never a manufacturer or supplier of asbestos-containing products.

21 Defendant has not been able to determine a specific date
22 in response to this interrogatory, because it is not feasible to
23 interview thousands of employees and prior employees regarding this
24 issue.

25 With the advent of OSHA regulations in 1972, Defendant
26 complied with requirements of those regulations.

27 ///

1 INTERROGATORY NO. 48:

2 Did THIS DEFENDANT ever issue a written COMPANY policy
3 discontinuing warning its employees that exposure to asbestos could
4 be hazardous to human health? If so,

5 A. Provide the date;

6 B. Describe the circumstances; and

7 C. Either (1) attach all DOCUMENTS evidencing the
8 information sought in this Interrogatory and its subparts to your
9 answers to these Interrogatories, or (2) attach disks containing
10 such data, or (3) describe such DOCUMENTS with sufficient
11 particularity that they may be made the subject of a request for
12 production of documents.

13 RESPONSE TO INTERROGATORY NO. 48:

14 On information and belief, Defendant responds: no.

15 INTERROGATORY NO. 49:

16 Did THIS DEFENDANT provide any Independent Contractor or
17 Subcontractor within the GEOGRAPHIC AREA with a written warning that
18 exposure to asbestos could be hazardous to human health.

19 RESPONSE TO INTERROGATORY NO. 49:

20 Defendant has conducted a diligent search and reasonable
21 inquiry in an attempt to respond to this interrogatory. Defendant
22 is unable to determine what written warnings were provided to
23 independent contractors or subcontractors on its projects regarding
24 asbestos. At the relevant times, Defendant was a large company with
25 tens of thousands of employees located in offices and on projects
26 throughout the United States and abroad. Defendant was an
27 engineering and construction company engaged in the design and

1 construction of large industrial facilities. Defendant was never a
2 manufacturer or supplier of asbestos-containing products.

3 Defendant has not been able to determine a specific
4 response to this interrogatory, because it is not feasible to
5 interview thousands of employees and prior employees regarding this
6 issue.

7 With the advent of OSHA regulations in 1972, Defendant
8 complied with requirements of those regulations.

9 INTERROGATORY NO. 50:

10 Has THIS DEFENDANT been cited for or otherwise charged by a
11 public agency with a violation in the GEOGRAPHIC AREA of any
12 statute, ordinance, safety order, regulation, or law pertaining to
13 asbestos exposure? For each occasion, IDENTIFY:

14 A. The code section, safety order, statute, or
15 regulation for which THIS DEFENDANT had been cited or otherwise
16 charged;

17 B. The date(s) thereof;

18 C. The agency or other governmental unit which issued
19 the citation or otherwise charged YOU;

20 D. All persons known to YOU with information relevant
21 to the incident;

22 E. What was the ultimate resolution.

23 RESPONSE TO INTERROGATORY NO. 50:

24 Defendant has conducted a diligent search and a
25 reasonable inquiry in an attempt to respond to this interrogatory
26 and based upon such and upon information and belief, Defendant
27 responds: No.

1 INTERROGATORY NO. 51:

2 If THIS DEFENDANT has ever owned or operated a railroad,
3 state:

4 A. The IDENTITY of each such railroad, including the
5 name(s) of such railroad during the time period of YOUR ownership
6 and/or operation, the principal place of business of such railroad
7 and the dates of YOUR ownership and/or operation;

8 B. The geographic area of operation of such railroad;

9 C. The name(s) of such railroad prior to YOUR
10 ownership and/or operation;

11 D. The IDENTITY of the person or entity from whom YOU
12 purchased your ownership or operating interest, and the date of such
13 purchase;

14 E. The IDENTITY of the person or entity to whom YOU
15 sold your ownership or operating interest, and the date of such
16 sale;

17 F. Whether copies of DOCUMENTS evidencing your
18 ownership/operation and/or sale exist;

19 G. The IDENTITY of the Custodian of such DOCUMENTS;

20 H. To the extent that information has not been given
21 in answers to Interrogatory Nos. 32 and 33, the information
22 requested in Interrogatory Nos. 32 and 33, for each railroad owned
23 or operated by YOU.

24 RESPONSE TO INTERROGATORY NO. 51:

25 Not applicable.

26 INTERROGATORY NO. 52:

27 If DEFENDANT has ever owned or operated a shipyard, state:

1 A. The IDENTITY of each such shipyard, including the
2 name(s) of such shipyard during the time period of YOUR ownership
3 and/or operation, the place of business of such shipyard and the
4 dates of YOUR ownership and/or operation;

5 B. The name(s) of such shipyard prior to YOUR
6 ownership and/or operation;

7 C. The IDENTITY of the person or entity to whom YOU
8 sold your ownership or operating interest, and the date of such
9 sale;

10 D. Whether copies of DOCUMENTS evidencing your
11 ownership/operation and/or sale exist;

12 E. Whether any representative of THIS DEFENDANT
13 attended the Maritime Commission Conference in December 1942 in
14 Chicago, Illinois? If so, IDENTIFY any such representative of THIS
15 DEFENDANT;

16 F. The IDENTITY of the Custodian of such DOCUMENTS;

17 G. To the extent that information has not been given
18 in answers to Interrogatory No. 32, the information requested in
19 Interrogatory No. 32, for each shipyard owned or operated by YOU.

20 RESPONSE TO INTERROGATORY NO. 52:

21 Not applicable.

22 INTERROGATORY NO. 53:

23 At any time between 1930 and 1985, did you import, export,
24 ship, transship or otherwise transport RAW ASBESTOS or ASBESTOS-
25 CONTAINING PRODUCTS into, out of or through any port in the
26 GEOGRAPHIC AREA? If so, for each occasion:

27 A. IDENTIFY and describe the NATURE and amount of RAW

1 ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS;

2 B. IDENTIFY the ship or ships (including the owners
3 and operators thereof) onto or from which the RAW ASBESTOS and/or
4 ASBESTOS-CONTAINING PRODUCTS were loaded, unloaded or transshipped;

5 C. State the dates, port and pier involved for each
6 occasion;

7 D. Either (1) attach all DOCUMENTS evidencing the
8 information sought in this Interrogatory and its subparts to your
9 answers to these Interrogatories, or (2) attach disks containing
10 such data, or (3) describe such DOCUMENTS with sufficient
11 particularity that they may be made the subject of a request for
12 production of documents.

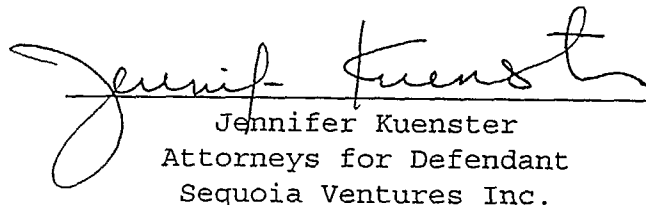
13 RESPONSE TO INTERROGATORY NO. 53:

14 No.

15
16 Dated: June 6, 1997

THELEN, MARRIN, JOHNSON & BRIDGES LLP

17
18 By


Jennifer Kuenster
Attorneys for Defendant
Sequoia Ventures Inc.

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VERIFICATION

I, Richard Pugliese, state:

I am Senior Paralegal of Bechtel Corporation, and am
duly authorized to make this Verification on its behalf. I
have read the foregoing SEQUOIA VENTURES INC.'S RESPONSES TO
PLAINTIFFS' STANDARD INTERROGATORIES TO ALL DEFENDANTS
PURSUANT TO GENERAL ORDER 129, and am informed and believe,
and on that basis state, that the matters contained therein
are true.

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

Dated: June 6, 1997


Richard Pugliese