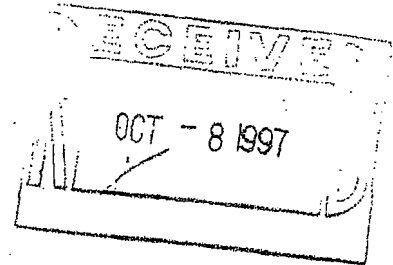


FILE NAME: Bechtel (BECH)

DATE: 1997

DOC#: BECH010

DOCUMENT DESCRIPTION: Legal - Defendant's Responses to Interrogatories



1 PHILIP R. PLACIER, State Bar No. 029099
2 JENNIFER A. KUENSTER, State Bar No. 104607
3 THELEN, MARRIN, JOHNSON & BRIDGES LLP
4 Two Embarcadero Center, Suite 2100
5 San Francisco, California 94111
6 Telephone: (415) 392-6320

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

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF ALAMEDA

12 IN RE:

13 COMPLEX ASBESTOS LITIGATION

14 IN RE:

15 SHIPYARD AND APPLICATOR
16 ASBESTOS CASES (CONSOLIDATED
17 FOR DISCOVERY)

Case No.: 607734-9

DEFENDANT SEQUOIA VENTURES
INC.'S (FORMERLY KNOWN, AND
ERRONEOUSLY SUED AS BECHTEL
CORPORATION) SUPPLEMENTAL
RESPONSES TO INTERROGATORIES

No. 537868-7

19 PROPOUNDING PARTY: Plaintiffs

20 RESPONDING PARTY: Defendant SEQUOIA VENTURES INC.

21 SET NUMBER: ONE (1)

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

25 GENERAL OBJECTIONS

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

- 1 c. Senior Administrative Assistant
2 d. Mr. Pugliese was first employed with Bechtel in
3 May, 1989 as a senior paralegal. Mr. Pugliese assumed his
4 current position of Senior Administrative Assistant in
5 September, 1992.

6 INTERROGATORY NO. 4:

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

11 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

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

15 INTERROGATORY No. 16:

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

- 19 a. the date said facilities began operation;
20 b. the date said facility ceased operation; and c.
21 the name of each type of ASBESTOS-CONTAINING PRODUCT
22 manufactured, processed or assembled at each such facility.

23 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16:

- 24 a. 1946.
25 b. 1953.
26 c. Large bore pipe.
27

1 INTERROGATORY NO. 33:

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

5 a. the wording of such warning;

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

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

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

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

14 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 33:

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

20 INTERROGATORY NO. 34:

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

24 a. whether copies of DOCUMENTS containing such
25 warnings exist;

26 b. the IDENTITY of the custodian of such
27 DOCUMENTS.