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9
10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF SAN FRANCISCO
12

13 IN RE: SAN FRANCISCO COUNTY
14 COMPLEX ASBESTOS LITIGATION

CASE NO. 828684

KAISER GYPSUM COMPANY, INC.'S
UPDATED RESPONSES TO
PLAINTIFFS' STANDARD
INTERROGATORIES TO DEFENDANTS

15 PROPOUNDING PARTY : Plaintiffs
16 RESPONDING PARTY : Defendant Kaiser Gypsum Company, Inc.
17 SET : Standard
18 DATE : December 30, 1996

19 COMES NOW defendant Kaiser Gypsum Company, Inc. (hereinafter
20 "Kaiser Gypsum"), and provides the following updated responses to
21 plaintiffs' standard interrogatories propounded pursuant to San
22 Francisco County Complex Asbestos Litigation General Order No. 29:

23 KAISER GYPSUM'S PRELIMINARY STATEMENT AND OBJECTIONS

24 Kaiser Gypsum was constituted in 1952 and has been
25 headquartered in California since that date. Kaiser Gypsum
26 disposed of its last operating manufacturing plant in August 1978
27 and subsequently has not engaged in manufacturing or product sales
28 anywhere in the United States. Thus, all Kaiser Gypsum product

1 sales occurred between 1952 and 1978. Therefore, Kaiser Gypsum's
2 responses to plaintiffs' standard interrogatories are based almost
3 entirely on its ongoing review of documents presently available to
4 the These updated interrogatory responses reflect Kaiser Gypsum's
5 knowledge at this time and supersede any previous interrogatory
6 answers. Kaiser Gypsum reserves the right to further supplement
7 these responses in the event that more complete or accurate
8 information becomes available.

9 Kaiser Gypsum notes that these responses are made without
10 reference to the factual circumstances of any particular case,
11 and, accordingly, Kaiser Gypsum reserves the right to state
12 additional objections or provide supplemental responses that might
13 be appropriate in the specific context of a given plaintiff's
14 claim(s).

15 Kaiser Gypsum objects to requests for information that are
16 unlimited as to geographical scope on the grounds that such
17 requests are unduly burdensome and are not reasonably calculated
18 to lead to the discovery of evidence admissible in cases that are
19 subject to General Order No. 29. Accordingly, Kaiser Gypsum's
20 present responses hereto are limited to products sold and
21 operations conducted within the State of California.

22 Kaiser Gypsum objects to these interrogatories to the extent
23 that they call for information protected by the attorney/client
24 privilege or work product doctrine.

25 This Preliminary Statement and the objections contained
26 herein are incorporated into each of the responses set forth
27 below.

28 / / /

1 KAISER GYPSUM'S RESPONSES TO INTERROGATORIES

2 RESPONSE TO INTERROGATORY NO. 1:

3 (a) Joseph R. Hobby.

4 (b) 2680 Bishop Drive, Suite 225, San Ramon, California
5 94583.

6 (c) Vice President.

7 (d) 12/1/95-present: Vice President

8 RESPONSE TO INTERROGATORY NO. 2:

9 Kaiser Gypsum is a corporation.

10 (a) Its full and correct corporate name is Kaiser Gypsum
11 Company, Inc.

12 (b) Kaiser Gypsum is incorporated under the laws of the
13 State of Washington.

14 (c) Kaiser Gypsum was organized in 1952 through a somewhat
15 complicated process. Specifically, on June 19, 1952, Permanente
16 Cement Company (now known as Kaiser Cement Corporation) formed a
17 wholly owned subsidiary named Kaiser Gypsum Company, a California
18 Corporation. On August 1, 1952 Kaiser Gypsum Company purchased
19 from the Henry J. Kaiser Company two gypsum wallboard plants
20 located at Long Beach and Redwood City, California.

21 On December 1, 1952, Kaiser Gypsum Company was merged into
22 Pacific Coast Cement Company, another subsidiary of Permanente
23 Cement Company, with Pacific Coast Cement Company, a Washington
24 Corporation, which at the time of the merger had no assets or
25 operations and which was incorporated on November 28, 1927, being
26 the survivor. The name of the combined company was then changed
27 to Kaiser Gypsum Company, Inc.
28

1 (d) Kaiser Gypsum's principal place of business is located
2 at 3000 Busch Road, Pleasanton, California 94566.

3 (e) Kaiser Gypsum has held a certificate of authority to do
4 business in California from 1952 to the present.

5 (f) Kaiser Gypsum's California "registered agent" is CT
6 Corporation, 818 West Seventh Street, Los Angeles, CA 90017.

7 (g) Kaiser Gypsum is a wholly owned subsidiary of Kaiser
8 Cement Corporation, whose principal place of business is located
9 at 3000 Busch Road, Pleasanton, California 94566.

10 RESPONSE TO INTERROGATORY NO. 3:

11 Yes. See the history of Kaiser Gypsum's formation in 1952
12 that is provided in its answer to Interrogatory 2(c) above.

13 RESPONSE TO INTERROGATORY NO. 4:

14 (a) No.

15 (b) Not applicable.

16 (c) Not applicable.

17 RESPONSE TO INTERROGATORY NO. 5:

18 No.

19 RESPONSE TO INTERROGATORY NO. 6:

20 (a) Kaiser Gypsum's corporate records are located at its
21 headquarters, whose address is 3000 Busch Road, Pleasanton,
22 California 94566; at 2680 Bishop Drive, San Ramon, CA 94583; and
23 at a commercial storage site or sites located in the greater San
24 Francisco area.

25 (b) Joseph R. Hobby, Vice President, 2680 Bishop Drive, San
26 Ramon, California.

27 RESPONSE TO INTERROGATORY NO. 7:

28 (a) through (h): No.

1 RESPONSE TO INTERROGATORY NO. 8:

2 (a) See response to 8(e) and 8(g).

3 (b) No.

4 (c) See response to 8(e) and 8(g).

5 (d) See response to 8(e) and 8(g).

6 (e) Yes. 1953 to 1976.

7 (f) See response to 8(e) and 8(g).

8 (g) Yes. 1953 to 1976.

9 RESPONSE TO INTERROGATORY NO. 9:

10 Not applicable.

11 RESPONSE TO INTERROGATORY NO. 10:

12 I. Kaiser Gypsum's Business: Gypsum Plaster,
13 Gypsum Lath, and Gypsum Wallboard - No Asbestos Used

14 Kaiser Gypsum was organized by Henry J. Kaiser (1882-1967),
15 the famous industrialist and World War II hero, in 1952 and
16 terminated its United States sales and manufacturing in 1978.
17 Between 1952 and 1978, Kaiser Gypsum's principal business
18 consisted of manufacturing and marketing gypsum plaster, gypsum
19 lath and gypsum wallboard. The word "gypsum" is derived from the
20 Greek word "gypso," meaning chalk. "Gypsum" is hydrous calcium
21 sulfate. Gypsum plaster is sometimes called Plaster of Paris,
22 because gypsum plaster was widely used in the capital of France
23 during the 19th century. Gypsum occurs in nature in rock form,
24 and is found in abundance in Baja California, Mexico.

25 A. Gypsum Plaster Products

26 During Kaiser Gypsum's first years in business, most houses
27 and many other buildings had interior walls that were made with
28 plaster. The plaster products sold by Kaiser Gypsum were

1 essentially finely-ground gypsum rock packaged in bags. Such
2 gypsum plaster products were mixed with water and an aggregate
3 (most commonly sand) at the construction site to form a paste.
4 The paste was applied by hand and smoothed with a trowel to form a
5 wall or ceiling surface. Sometimes several layers of plaster were
6 used, with the underneath layers being brown in color and the
7 surface layer being white. When dried, the plaster became quite
8 hard. A plaster wall or ceiling typically was finished by
9 painting the plaster surface or covering it with wallpaper.

10 Kaiser Gypsum's plaster products designed for the above
11 construction uses included Hardwall Plaster, Fibered Hardwall
12 Plaster, Dual Purpose Fibered Hardwall Plaster, Dual Purpose
13 Unfibered Hardwall Plaster, Wood Fibered Hardwall Plaster, Slow
14 Set Gauging Plaster, and Quick Set Gauging Plaster. They also
15 included plaster products for casting (e.g., making ornaments or
16 statues including Casting Plaster and Slow Set Casting Plaster).
17 Kaiser Gypsum also manufactured Plaster Retarder and Structural
18 Gypsum (Pre-Mixed Gypsum Concrete). Kaiser Gypsum plaster
19 products also included Red-E-Mix plaster, a pre-mixed product
20 which combined plaster and aggregate, that was introduced in 1956.
21 Gun Plaster, introduced in 1957, was applied by mixing the sacked
22 product on the job site in special portable mixing machines, and
23 it was then pumped through a large diameter hose to the inside of
24 a building where it was sprayed by plasterers onto walls, with
25 comparative speed and economy. Kaiser Gypsum never used asbestos
26 as a component in any of those products.

1 **B. Gypsum Lath Products**

2 The surface to which gypsum plaster was applied was called
3 "lath." Lath was sometimes made of wire, but lath also could be
4 made of hard, paper covered sheets of gypsum plaster (called
5 gypsum stucco), sometimes made with holes in them. The lath
6 sheets would be affixed to the interior wall framing, and
7 plaster would then be applied to the lath. The holes in the lath
8 would help keep the plaster in place while it dried. Kaiser Gypsum
9 made gypsum lath of this type. Kaiser Gypsum lath products
10 included Plain Lath and Perforated Lath, Foil-Back Insulating
11 Lath, Duralath, Gypsum Veneer Base, and Kaiserwall. Kaiser Gypsum
12 never used asbestos as a component in any of those products.

13 **C. Gypsum Wallboard Products**

14 In years following the Korean War, there were numerous
15 innovations in housing construction, including many changes
16 intended to lower housing construction costs. One such change was
17 the substitution of gypsum wallboard, or drywall, for plaster.
18 Gypsum wallboard, like gypsum lath, is basically a hard sheet of
19 gypsum plaster that is affixed to the wall framing. Typically
20 gypsum wallboard would be made in pieces that were 4 feet wide and
21 8 feet long. They typically were 1/2 inch or 5/8 inch thick.
22 During the manufacturing process, the wallboard's core of gypsum
23 plaster was covered by a special paper that could be painted or
24 covered with wallpaper.

25 Because more walls, partitions or ceilings could be made
26 using gypsum wallboard in a given period of time than could be
27 made by plastering over lath, constructing houses, apartments and
28 other buildings with wallboard was less expensive. Over time, as

1 building codes were amended to permit use of gypsum wallboard,
2 more construction of interior walls, partitions and ceilings was
3 done using wallboard and less using plaster. Reflecting this
4 trend, Kaiser Gypsum's business focused more on gypsum wallboard
5 as time passed. By 1960 about half of the construction in
6 California used wallboard and half still used plaster. Plaster use
7 continued to decline, and by the early 1970's substantially all of
8 the market demand was for gypsum wallboard. Kaiser Gypsum never
9 used asbestos as a component in any of its gypsum wallboard
10 products.

11 D. Non-Asbestos Products Exceeded 90% Of Total Sales

12 The bulk of Kaiser Gypsum's sales has always consisted of
13 products that did not use asbestos as a component. To illustrate,
14 the following chart shows sales totals in dollars for the years
15 1963-1975, the last full year prior to the complete cessation of
16 the use of asbestos as a component in Kaiser Gypsum products:

Year	Non-Asbestos Products	Total Sales	Non-Asbestos Product Percentage Of Total
1969	\$41,360,000	\$43,299,000	96%
1970	\$37,258,000	\$39,457,000	94%
1971	\$48,403,000	\$51,671,000	94%
1972	\$58,468,000	\$63,056,000	93%
1973	\$65,803,000	\$71,382,000	92%
1974	\$64,996,000	\$70,139,000	93%
1975	\$41,318,000	\$43,935,000	94%

24 As these figures illustrate, Kaiser Gypsum's sales of non-
25 asbestos-containing products always were substantially more than
26 90% of its business.
27
28

1 II. Accessories For Use With Gypsum Wallboard

2 A. Nails, Wall And Door Frames, Cornerbead,
3 Paper Products - No Asbestos Used

4 With the expansion of its gypsum wallboard business, Kaiser
5 Gypsum also began selling other products needed to construct
6 interior walls, partitions or ceilings using gypsum wallboard.
7 These included special nails and other devices used to attach
8 wallboard to the supporting frame. They also included metal wall
9 or partition frames especially made for installing wallboard,
10 metal "cornerbead" used to make partition corners hard, and metal
11 doorframes for use in walls made using gypsum wallboard. Partly
12 to ensure that it could get access to adequate amounts of the
13 special paper used to make wallboard (by covering its gypsum
14 plaster core), Kaiser Gypsum acquired paper plants, where it also
15 manufactured commercial paper products such as cardboard boxes.
16 Kaiser Gypsum never used asbestos as a component in any of those
17 products.

18 B. Wallboard Joint Compounds -
19 Asbestos Used As A Component

20 When the walls or ceilings of a room are made from gypsum
21 wallboard, large pieces of wallboard are installed side by side,
22 leaving small spaces where two pieces of wallboard meet. These
23 spaces need to be filled so that they cannot be seen after the
24 wall is painted or covered with wallpaper. The products used to
25 perform that task are called joint compounds or joint finishing
26 compounds. At the time of use, these joint compounds are thick
27 putty or mud-like substances, which permits them to be pushed into
28 the spaces and smoothed with a putty knife or spatula. Paper or

1 cloth reinforcing tape is pushed into the joint compound to help
2 prevent cracking as the joint compound dries. The joint compound
3 dries to form a hard rock-like substance.

4 Kaiser Gypsum manufactured and marketed such wallboard joint
5 compounds, and prior to the mid-1970's, these joint compounds
6 contained a small percentage of chrysotile asbestos as a
7 component. The purpose of the chrysotile asbestos component was
8 to prevent cracks from forming as the joint compound dried.

9 "Asbestos" is the Greek word for "incombustible," which refers to
10 things that will not burn. Chrysotile is the most common type of
11 asbestos used in products in the United States. Chrysotile is a
12 fibrous rock material derived from the rock "serpentine" which is
13 very common in California, where it is the "state rock."

14 These Kaiser Gypsum products were:

- 15 1. Joint Cement/Joint Compound
- 16 2. Finishing (Topping) Compound
- 17 3. 3-Purpose Wallboard Compound
- 18 4. One-Day Joint Compound
- 19 5. Pre-mix Joint Compound
- 20 6. Pre-mix Finishing Compound
- 21 7. Pre-mix Dual Purpose Joint Compound
- 22 8. Pre-mix Topping Compound
- 23 9. Laminating Compound

24 Kaiser Gypsum's separate responses to interrogatory subparts
25 (a)-(f) for each of these products are as follows:

26 1. Joint Cement/Joint Compound

27 (a) The trade name of this product originally was Kaiser
28 Joint Cement; about 1957 it was changed to Kaiser Joint Compound.

(b) Kaiser Gypsum marketed Kaiser Joint Cement in 1952, but
did not manufacture the product itself. Kaiser Gypsum does not
know whether the product marketed in 1952 contained asbestos as a

1 component. Kaiser Gypsum began manufacturing Kaiser Joint Cement
2 in 1953, at which time chrysotile asbestos was used as a
3 component.

4 (c) Kaiser Gypsum last manufactured Kaiser Joint Compound
5 with chrysotile asbestos as a component in 1975.

6 (d) The Kaiser Gypsum California plants that made this
7 product were located at Redwood City and Antioch. These plants
8 were in operation at different times. The product was
9 manufactured at Redwood City from 1953 through 1957 and at Antioch
10 from 1957 to 1975. Because of the heavy weight of the product,
11 low profit margin and high transportation costs, distribution
12 tended to center around the location of the manufacturing plant.
13 The product consisted primarily of minerals including casein or
14 polyvinyl, clay, talc, limestone and mica. The product
15 manufactured in Kaiser Gypsum's California plants included between
16 8% by weight and 16% by weight chrysotile asbestos as a component
17 depending on the formula in effect at a given date.

18 (e) This product was a white to off-white powder. It was
19 packaged and sold in sacks of 10 to 25 lbs. and in boxes of 5 and
20 18 lbs. Each container was labeled with the name of the
21 manufacturer, Kaiser Gypsum Company, Inc., the name of the product
22 and directions for its use.

23 (f) This product was a dry powder which, when mixed with
24 water, formed a thick paste. Upon application it dried to a hard,
25 durable surface. It was used to fill gypsum wallboard joints,
26 embed joint reinforcing tape, finish joints and to cover and
27 finish nail heads and metal cornerbead.

1 2. Finishing (Topping) Compound

2 (a) The trade name of this product was Kaiser Gypsum
3 Finishing (topping) Compound.

4 (b) Kaiser Gypsum began manufacturing finishing (topping)
5 compound in 1955, and chrysotile asbestos was used as a component
6 at that time.

7 (c) Kaiser Gypsum last manufactured finishing (topping)
8 compound with chrysotile asbestos as a component in 1975.

9 (d) The Kaiser Gypsum California plants that made this
10 product were located at Redwood City and Antioch. These plants
11 were in operation at different times. The product was
12 manufactured at Redwood City from 1955 to 1957 and at the Antioch
13 plant from 1957 to 1975. Because of the heavy weight of the
14 product, low profit margin and high transportation costs,
15 distribution tended to center around the location of the
16 manufacturing plant. This product consisted primarily of minerals
17 including casein or polyvinyl, clay, talc, limestone and mica.
18 The product included between 5.3% by weight and 16% by weight
19 chrysotile asbestos as a component depending on the formula in
20 effect at a given time.

21 (e) This product was a white to off-white powder. It was
22 packaged and sold in sacks of 25 lbs. Each container was labeled
23 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,
24 the name of the product and instructions for its use.

25 (f) This product was a dry powder which, when mixed with
26 water, formed a thick paste. Upon application it dried to a hard,
27 durable surface. It was used to top and finish gypsum wallboard
28 joints.

1 3. 3-Purpose Wallboard Compound

2 (a) The trade name of this product was Kaiser Gypsum 3-
3 Purpose Wallboard Compound.

4 (b) Kaiser Gypsum began manufacturing 3-Purpose Wallboard
5 Compound in 1968, and chrysotile asbestos was used as a component
6 at that time.

7 (c) Kaiser Gypsum last manufactured 3-Purpose Wallboard
8 Compound with chrysotile asbestos as a component in 1976.

9 (d) The Kaiser Gypsum California plant that made this
10 product was located at Antioch. Because of the heavy weight of
11 the product, low profit margin and high transportation costs,
12 distribution tended to center around the location of the
13 manufacturing plant. This product consisted primarily of minerals
14 including casein or polyvinyl, clay, talc, limestone and mica.
15 The product included between 5.1% by weight and 14.2% by weight
16 chrysotile asbestos as a component.

17 (e) The product was a white to off-white powder. It was
18 packaged and sold in sacks of 25 lbs. Each sack was labeled with
19 the name of the manufacturer, Kaiser Gypsum Company, Inc., the
20 name of the product and directions for its use.

21 (f) This product was a dry powder which, when mixed with
22 water, formed a thick paste. Upon application it dried to a hard,
23 durable surface. It was used to tape, top and finish gypsum
24 wallboard joints, nailheads and metal cornerbead.

25 4. One-Day Joint Compound

26 (a) The trade name of this product was Kaiser Gypsum One-Day
27 Joint Compound Powder.

1 (b) Kaiser Gypsum began manufacturing One Day Joint Compound
2 Powder in 1968, and chrysotile asbestos was used as a component at
3 that time.

4 (c) Kaiser Gypsum last manufactured One Day Joint Compound
5 Powder with chrysotile asbestos as a component in 1975.

6 (d) The Kaiser Gypsum California plants that made this
7 product were located at Santa Ana and Antioch. Because of the
8 heavy weight of the product, low profit margin and high
9 transportation costs, distribution tended to center around the
10 location of the manufacturing plant. The product consisted
11 primarily of casein limestone and mica. The product included
12 3.4% by weight chrysotile asbestos as a component.

13 (e) This product was a white to off-white powder. It was
14 packaged and sold in sacks of 25 lbs. Each sack was labeled with
15 the name of the manufacturer, Kaiser Gypsum Company, Inc., the
16 name of the product and directions for its use.

17 (f) This product was a dry powder which, when mixed with
18 water, formed a thick paste. Upon application it dried to a hard,
19 durable surface. It was used to fill gypsum wallboard joints,
20 embed joint reinforcing tape, finish joints and to cover and
21 finish nailhead and metal cornerbead.

22 5. Pre-Mix Joint Compound

23 (a) The trade name of this product was Kaiser Gypsum Pre-Mix
24 Joint Compound.

25 (b) Kaiser Gypsum began manufacturing Pre-Mix Joint Compound
26 in 1959, and chrysotile asbestos was used as a component at that
27 time.
28

1 (c) Kaiser Gypsum last manufactured Pre-Mix Joint Compound
2 with chrysotile asbestos as a component in 1962.

3 (d) The Kaiser Gypsum California plant that made this
4 product was located at Long Beach. Because of the heavy weight of
5 the product, low profit margin and high transportation cost,
6 distribution tended to center around the location of the
7 manufacturing plant. This product consisted primarily of minerals
8 including casein or polyvinyl, clay, talc, limestone and mica.
9 The product included chrysotile asbestos as a component. The
10 percentage presently is unknown. Investigation is continuing.

11 (e) This product was a white to off-white colored paste. It
12 was packaged and sold in cans of 4 or 5 gallons and in cartons of
13 5 gallons. Each container was labeled with the name of the
14 manufacturer, Kaiser Gypsum Company, Inc., the name of the product
15 and directions for its use.

16 (f) This product was a thick paste like material which upon
17 application dried to a hard, durable surface. It was used to fill
18 gypsum wallboard joints, embed joint reinforcing tape, finish
19 joints and to cover and finish nailheads and cornerbead.

20 **6. Pre-Mix Finishing Compound**

21 (a) The trade name of this product was Kaiser Gypsum Pre-Mix
22 Finishing Compound.

23 (b) Kaiser Gypsum began manufacturing Pre-Mix Finishing
24 Compound in 1959, and chrysotile asbestos was used as a component
25 at that time.

26 (c) Kaiser Gypsum last manufactured Pre-Mix Finishing
27 Compound with chrysotile asbestos as a component in 1962.
28

1 (d) The Kaiser Gypsum California plant that made this
2 product was located at Long Beach. Because of the heavy weight of
3 the product, low profit margin and high transportation cost,
4 distribution tended to center around the location of the
5 manufacturing plant. This product consisted primarily of minerals
6 including casein or polyvinyl, clay, talc, limestone and mica.
7 The product included chrysotile asbestos as a component. The
8 percentage presently is unknown. Investigation is continuing.

9 (e) This product was a white to off-white colored paste. It
10 was packaged and sold in cans of 4 or 5 gallons and in cartons of
11 5 gallons. Each container was labeled with the name of the
12 manufacturer, Kaiser Gypsum Company, Inc., the name of the product
13 and directions for its use.

14 (f) This product was a thick paste like material which upon
15 application dried to a hard, durable surface. It was used to
16 finish gypsum wallboard joints and to cover and finish nailheads
17 and cornerbead.

18 7. Pre-Mix Dual Purpose Joint Compound

19 (a) The trade name of this product was Kaiser Gypsum Pre-Mix
20 Dual Purpose Joint Compound.

21 (b) Kaiser Gypsum began manufacturing Pre-Mix Dual Purpose
22 Joint Compound in 1960, and chrysotile asbestos was used as a
23 component at that time.

24 (c) Kaiser Gypsum last manufactured Pre-Mix Dual Purpose
25 Joint Compound with chrysotile asbestos as a component in 1975.

26 (d) The Kaiser Gypsum California plants that made this
27 product were located at Long Beach, Antioch and Santa Ana.
28 Because of the heavy weight of the product, low profit margin and

1 high transportation costs, distribution tended to center around
2 the location of the manufacturing plant. This product consisted
3 primarily of minerals including polyvinyl, clay, talc, limestone
4 and mica. The product included between 1.5% by weight and 6% by
5 weight chrysotile asbestos as a component depending on the formula
6 in effect at a given date.

7 (e) This product was a white to off-white or light buff
8 colored paste. It was packaged and sold in 5 gallon metal cans or
9 plastic pails, and 4 or 5 gallon cartons. Beginning in 1966 small
10 amounts were sold in 5 quart plastic buckets as an accommodation
11 product for lumber dealers under the name 3-purpose premix
12 compound. Each container was labeled with the name of the
13 manufacturer, Kaiser Gypsum Company, Inc., the name of the product
14 and directions for its use.

15 (f) This product was a thick paste like material which upon
16 application dried to a hard, durable surface. It was used to
17 finish gypsum wallboard joints, embed joint reinforcing tape,
18 finish joints and to cover and finish nailheads and metal
19 cornerbead.

20 **8. Pre-Mix Topping Compound**

21 (a) The trade name of this product was Kaiser Gypsum Pre-Mix
22 Topping Compound.

23 (b) Kaiser Gypsum began manufacturing Pre-Mix Topping
24 Compound in 1968, and chrysotile asbestos was used as a component
25 at that time.

26 (c) Kaiser Gypsum last manufactured Pre-Mix Topping Compound
27 with chrysotile asbestos as a component in 1976.
28

1 (d) The Kaiser Gypsum California plants that made this
2 product were located at Santa Ana and Antioch. Because of the
3 heavy weight of the product, low profit margin and high
4 transportation costs, distribution tended to center around the
5 location of the manufacturing plant. This product consisted
6 primarily of minerals including casein or polyvinyl, clay, talc,
7 limestone and mica. The product included between 0.9% by weight
8 and 2% by weight chrysotile asbestos as a component depending on
9 the formula in effect at a given date.

10 (e) This product was a white to off-white or light buff
11 colored paste. It was packaged and sold in metal and plastic
12 buckets of 4 or 5 gallons and in cartons of 4 gallons. Each
13 container was labeled with the name of the manufacturer, Kaiser
14 Gypsum Company, Inc., the name of the product and directions for
15 its use.

16 (f) This product was a thick paste like material which upon
17 application dried to a hard, durable surface. It was used to top
18 and finish gypsum wallboard joints.

19 **9. Laminating Compound**

20 (a) The trade name of this product was Kaiser Gypsum
21 Laminating Compound.

22 (b) Kaiser Gypsum began manufacturing Laminating Compound in
23 1961, at which time chrysotile asbestos was used as a component.

24 (c) Kaiser Gypsum last manufactured Kaiser Gypsum Laminating
25 Compound with chrysotile asbestos as a component in 1972, at which
26 time the product was discontinued.

27 (d) The Kaiser Gypsum California plants that made this
28 product were located at Antioch and Santa Ana. These plants were

1 in operation at different times. The product was manufactured at
2 Antioch from 1961 through 1970 and at Santa Ana in 1971 and 1972.
3 Because of the heavy weight of the product, low profit margin and
4 high transportation costs, distribution tended to center around
5 the location of the manufacturing plant. The product consisted
6 primarily of soya, flour and limestone. The product included
7 between 6.5% by weight and 10% by weight chrysotile asbestos as a
8 component depending upon the formula in effect at a given date.

9 (e) This product was a white to off-white powder. It was
10 packaged and sold in sacks of 25 lbs. Each container was labeled
11 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,
12 the name of the product and directions for its use.

13 (f) This product was a dry powder, which when mixed with
14 water formed a thick paste. It was used as an adhesive to
15 laminate one piece of gypsum wallboard to another, which was
16 occasionally done to create gypsum drywall partitions having
17 thicker wallboard than could be created by a single sheet. For
18 example, gypsum wallboard typically came in sheets 1/2 inch and
19 5/8 inch thick. If one wanted a gypsum wallboard that was 1 inch
20 thick, this would be created by laminating together two pieces of
21 gypsum wallboard that were each 1/2 inch thick. Laminating
22 compound was used for this purpose. Additionally, it was used to
23 laminate gypsum wallboard to sound deadening board, which would
24 increase the wall's capacity to prevent transmission of sound from
25 one room to another.

26 * * *

1 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)
2 applicable to all of the eight wallboard joint compound products
3 discussed above are as follows:

4 (g) Kaiser Gypsum is unsure as to the intended meaning of
5 "The U.S. Government's 'Qualified Products List'," but has no
6 knowledge that any of its wallboard joint compound products ever
7 appeared on such a list.

8 (h) Kaiser Gypsum is aware of the following suppliers of
9 chrysotile asbestos:

10 John K. Bice
11 Harrison & Crosfield
12 Carmonia Chemical Co.
13 Western Chemical Co.
14 Philip Carey Corp. (Carey Canadian Asbestos)
15 Johns-Manville
16 Union Carbide Corp.
17 E. S. Browning
18 Loomis Chemical Co.
19 Benson Chemical
20 Paul W. Wood (Johns-Manville)

21 Current addresses, if any, are not known to Kaiser Gypsum.
22 Most of the specific time periods during which these firms
23 supplied asbestos are unknown.

24 (i) (i through iii) Kaiser Gypsum is not aware of ever selling
25 such products to shipyards, power companies or refineries. Kaiser
26 Gypsum sold such products to non-governmental customers in Northern
27 California from approximately 1952 to 1976. These customers consist
28 largely of building contractors or building materials dealers.

Kaiser Gypsum has some retained sales orders and sales
invoices for some years which identify the purchasers of Kaiser
Gypsum products, the dates of sale, the amount of each product
sold and, in some cases, the sites to which the products were to

1 be delivered. These documents do not distinguish between sales of
2 asbestos-containing products and other products.

3 (j) Sales orders and sales invoices. See also Response to
4 Interrogatory 6(b).

5 **C. Decorative Texture Finishes For Interior Walls**
6 **or Ceilings - Asbestos Used As A Component**

7 Drywall partitions or walls made from gypsum wallboard are
8 sometimes decorated with wall covering or wallpaper that is fixed
9 to the wall by an adhesive or glue. On other occasions such walls
10 are finished by painting them. There are many varieties of paint,
11 including some that are intended to create a textured surface
12 (rather than a smooth surface). Kaiser Gypsum manufactured and
13 marketed several texture paint products that during certain years
14 used chrysotile asbestos as one of numerous components. Drywall
15 ceilings are sometimes finished with decorative products, as are
16 the cement slab ceilings found in some high-rise buildings.
17 Kaiser Gypsum also manufactured and marketed decorative texture
18 products for use on such interior ceilings that, during certain
19 years, used chrysotile asbestos as one of numerous components.
20 The Kaiser Gypsum decorative wall and ceiling texture products
21 were:

- 22 1. Cover-Tex texture paint
- 23 2. Spray-Tex or Spray Cover-Tex texture paint
- 24 3. Kaiser-Tex texture paint
- 25 4. Covertex (TSS) wall texture
- 26 5. K-Spray ceiling texture

27 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)
28 for each of these products are as follows:

1 1. Cover-Text Texture Paint

2 (a) The trade name of this product was Cover-Text texture
3 paint.

4 (b) Kaiser Gypsum marketed Cover-Text texture paint in 1952,
5 but it did not manufacture the product itself. Kaiser Gypsum does
6 not know whether the product marketed in 1952 contained asbestos.

7 Kaiser Gypsum began manufacturing this product in 1953, at which
8 time chrysotile asbestos was used as a component.

9 (c) Kaiser Gypsum last manufactured Cover-Text texture paint
10 with chrysotile asbestos as a component in 1967, when the product
11 was discontinued.

12 (d) The Kaiser Gypsum California plants that made this
13 product were located in Redwood City and Antioch. These plants
14 were in operation at different times. The product was
15 manufactured at Redwood City from 1953 through 1957 and at the
16 Antioch plant from 1957 through 1967. Because of the heavy weight
17 of the product, low profit margin and high transportation costs,
18 distribution tended to center around the location of the
19 manufacturing plant. The product consisted primarily of casein,
20 limestone and mica. The product included between 4.4% by weight
21 and 8.6% by weight chrysotile asbestos as a component depending
22 upon the formula in effect at a given date.

23 (e) This product was a white to off-white powder. It was
24 packaged and sold in sacks of 25 lbs. and sacks of 50 lbs. Each
25 container was labeled with the name of the manufacturer, Kaiser
26 Gypsum Company, Inc., the name of the product and directions for
27 its use.

1 (f) This product was a dry powder which, when mixed with
2 water formed a texture paint. It was used to produce texture
3 effects over gypsum wallboard surfaces.

4 **2. Spray-Tex Or Spray Cover-Tex Texture Paint**

5 (a) The trade name of this product was Spray-Tex. Later it
6 was changed to Spray Cover-Tex texture paint.

7 (b) Kaiser Gypsum began manufacturing this product in 1956,
8 at which time chrysotile asbestos was used as a component.

9 (c) Kaiser Gypsum last manufactured Spray Cover-Tex texture
10 paint with chrysotile asbestos as a component in 1967, when the
11 product was discontinued.

12 (d) The Kaiser Gypsum California plants that made this
13 product were located in Redwood City and Antioch. These plants
14 were in operation at different times. The product was
15 manufactured at Redwood City from 1956 through 1957 and at the
16 Antioch plant from 1957 through 1967. Because of the heavy weight
17 of the product, low profit margin and high transportation costs,
18 distribution tended to center around the location of the
19 manufacturing plant. The product consisted primarily of casein,
20 limestone and mica. The product included between 6.6% by weight
21 and 36.6% by weight chrysotile asbestos as a component depending
22 upon the formula in effect at a given date.

23 (e) This product was a white to off-white powder. However,
24 some colored versions of the product were offered. It was
25 packaged and sold in sacks of 25 lbs. and sacks of 50 lbs. Each
26 container was labeled with the name of the manufacturer, Kaiser
27 Gypsum Company, Inc. The name of the manufacturer, Kaiser Gypsum
28 Company, Inc., the name of the product and directions for its use.

1 (f) This product was a dry powder which, when mixed with
2 water formed a texture paint that was used to produce texture
3 effects over gypsum wallboard surfaces.

4 3. Kaiser-Tex Texture Paint

5 (a) The trade name of this product was Kaiser-Tex texture
6 paint.

7 (b) Kaiser Gypsum marketed Kaiser-Tex texture paint in 1952,
8 but it did not manufacture the product itself. Kaiser Gypsum does
9 not know whether the product manufactured in 1952 contained
10 asbestos. Kaiser Gypsum began manufacturing this product in 1953,
11 at which time chrysotile asbestos was used as a component.

12 (c) Kaiser Gypsum last manufactured Kaiser-Tex texture
13 paint with chrysotile asbestos as a component in 1967, when the
14 product was discontinued.

15 (d) The Kaiser Gypsum California plants that made this
16 product were located in Redwood City and Antioch. These plants
17 were in operation at different times. The product was
18 manufactured at Redwood City from 1953 through 1957 and at the
19 Antioch plant from 1957 through 1967. Because of the heavy weight
20 of the product, low profit margin and high transportation costs,
21 distribution tended to center around the location of the
22 manufacturing plant. The product consisted primarily of casein,
23 limestone and mica. The product included between 4.0% by weight
24 and 8.0% by weight chrysotile asbestos as a component depending
25 upon the formula in effect at a given date.

26 (e) This product was a white to off-white powder; however,
27 some colored paints were sold. It was packaged and sold in sacks
28 of 10 lbs. and sacks of 25 lbs. Each container was labeled with

1 the name of the manufacturer, Kaiser Gypsum Company, Inc., the
2 name of the product and directions for its use.

3 (f) This product was a dry powder which, when mixed with
4 water formed a texture paint. It was used to produce texture
5 effects over gypsum wallboard surfaces.

6 4. Cover-Tex (Tss) Wall Texture

7 (a) The trade name of this product was Kaiser Gypsum Cover-
8 Tex (TSS) wall texture paint.

9 (b) Kaiser Gypsum began manufacturing Cover-Tex Wall Texture
10 in 1968, at which time chrysotile asbestos was used as a
11 component.

12 (c) Kaiser Gypsum last manufactured Cover-Tex Wall Texture
13 with chrysotile asbestos as a component in 1975.

14 (d) The Kaiser Gypsum California plants that manufactured
15 this product were Santa Ana and Antioch. These plants were in
16 operation at different times. The product was manufactured at
17 Santa Ana from 1968 through 1975 and at the Antioch plant from
18 1968 through 1975. Because of the heavy weight of the product,
19 low profit margin and high transportation costs, distribution
20 tended to center around the location of the manufacturing plant.
21 The product consisted primarily of casein, limestone and mica.
22 The product included between 4.2% by weight and 8.7% by weight
23 chrysotile asbestos as a component depending upon the formula in
24 effect at a given date.

25 (e) The product was a white to off-white powder. It was
26 packaged and sold in 50 lb. sacks. Each container was labeled
27 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,
28 the name of the product and directions for its use.

1 (f) This was a dry powder which when mixed with water formed
2 a paint-like product designed for hand or spray application. When
3 dry, it produced a hard, durable surface. It was used to produce
4 texture effects over gypsum wallboard surfaces.

5 **5. K-Spray Ceiling Texture**

6 (a) The trade name of this product was Kaiser Gypsum K-Spray
7 Ceiling Texture.

8 (b) Kaiser Gypsum began manufacturing K-Spray Ceiling
9 Texture with chrysotile asbestos as a component in 1961.

10 (c) Kaiser Gypsum last manufactured K-Spray Ceiling Texture
11 with chrysotile asbestos as a component in 1975.

12 (d) The Kaiser Gypsum California plants that manufactured
13 this product were Santa Ana and Antioch. These plants were in
14 operation at different times. The product was manufactured at
15 Santa Ana from 1973 through 1975 and at the Antioch plant from
16 1961 through 1971. Because of the heavy weight of the product,
17 low profit margin and high transportation costs, distribution
18 tended to center around the location of the manufacturing plant.
19 The product consisted primarily of casein, limestone and mica.
20 The product included between 1.3% by weight and 9.9% by weight
21 chrysotile asbestos as a component depending upon the formula in
22 effect at a given date.

23 (e) The product was a white powder with polystyrene
24 aggregate. It was packaged and sold in 32 lb. sacks. Each
25 container was labeled with the name of the manufacturer, Kaiser
26 Gypsum Company, Inc., the name of the product and directions for
27 its use.
28

1 (f) This was a dry powder which when mixed with water formed
2 a paint-like product designed for spray application. When dry, it
3 produced a hard, durable surface. It was used to produce texture
4 effects over gypsum wallboard or interior concrete ceilings.

5 * * *

6 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)
7 applicable to all of the five decorative texture products
8 discussed above are as follows:

9 (g) Kaiser Gypsum is unsure as to the intended meaning of
10 "The U.S. Government's 'Qualified Products List'," but has no
11 knowledge that any of its decorative texture products ever
12 appeared on such a list.

13 (h) Kaiser Gypsum is aware of the following suppliers of
14 chrysotile asbestos:

15 John K. Bice
16 Harrison & Crosfield
17 Carmonia Chemical Co.
18 Western Chemical Co.
19 Philip Carey Corp. (Carey Canadian Asbestos)
20 Johns-Manville
21 Union Carbide Corp.
22 E. S. Browning
23 Loomis Chemical Co.
24 Benson Chemical
25 Paul W. Wood (Johns-Manville)

26 Current addresses, if any, are not known to Kaiser Gypsum.
27 Most of the specific time periods during which these firms
28 supplied asbestos are unknown.

29 (i) (i through iii) Kaiser Gypsum is not aware of ever
30 selling such products to shipyards, power companies or refineries.
31 Kaiser Gypsum sold such products to non-governmental customers in
32 Northern California from approximately 1952 to 1975. These

1 customers consisted largely of building contractors or building
2 materials dealers.

3 Kaiser Gypsum has some retained sales orders and sales
4 invoices for some years which identify the purchasers of Kaiser
5 Gypsum products, the dates of sale, the amount of each product
6 sold, and, in some cases, the sites to which the products were to
7 be delivered. These documents do not distinguish between sales of
8 asbestos-containing products and other products.

9 (j) Sales orders and sales invoices. See also Response to
10 Interrogatory 6(b).

11 D. Electric Radiant Heat System Finishing
12 Products - Asbestos Used As A Component

13 In areas where electricity was expected to be particularly
14 inexpensive, some houses and apartments were constructed with
15 electric radiant heating systems. In some such radiant heating
16 systems, grooves were cut in gypsum wallboard ceilings and
17 electrical heating cables secured in the grooves. The groove-
18 cracks were then filled and the ceiling covered with a decorative
19 finish. In other systems, electric heating wires were stapled to
20 the surface of wallboard. Then the ceiling was covered with a
21 thick decorative finish that would conceal the heating wires.
22 Kaiser Gypsum made several products for finishing such systems,
23 and these products used chrysotile asbestos as one of numerous
24 components. These Kaiser Gypsum products were:

- 25 1. Filler Compound
- 26 2. Radiant Heat Compound
- 27 3. Radiant Heat Scrimless Surfacing Compound

28 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)
for each of these products are as follows:

1 1. Filler Compound

2 (a) The trade name of this product was Kaiser Gypsum Filler
3 Compound.

4 (b) Kaiser Gypsum began manufacturing Filler Compound in
5 1961, at which time chrysotile asbestos was used as a component.

6 (c) Kaiser Gypsum last manufactured Filler Compound with
7 chrysotile asbestos as a component in 1972, when the product was
8 discontinued.

9 (d) The Kaiser Gypsum California plant that made this
10 product was located at Antioch. It manufactured Filler Compound
11 from 1961 to 1970. Because of the heavy weight of the product,
12 the low profit margin and high transportation costs, distribution
13 tended to center around the location of the manufacturing plant.
14 The product consisted primarily of minerals including limestone
15 and mica. The product used chrysotile asbestos as a component in
16 its formula but the amount of asbestos called for in the formula
17 used to manufacture the product at the Antioch plant is uncertain.
18 Investigation is continuing.

19 (e) This product was a white to off-white powder. It was
20 packaged and sold in sacks of 50 lbs. Each container was labeled
21 with contained the name of the manufacturer, Kaiser Gypsum
22 Company, Inc., the name of the product and directions for its use.

23 (f) This product was a dry powder, which when mixed with
24 water formed a thick paste. Upon application it dried to a hard,
25 durable surface. It was used to cover radiant heating system
26 ceiling surfaces.

27

28

1 2. Radiant Heat Compound

2 (a) The trade name of this product was Kaiser Gypsum Radiant
3 Heat Compound.

4 (b) Kaiser Gypsum began manufacturing this product in 1968,
5 at which time chrysotile asbestos was used as a component.

6 (c) Kaiser Gypsum last manufactured Radiant Heat Compound
7 with chrysotile asbestos as a component in 1974, when the product
8 was discontinued.

9 (d) The Kaiser Gypsum California plant that made this
10 product was located in Santa Ana, where it was manufactured from
11 1968 through 1974. Because of the heavy weight of the product,
12 the low profit margin and high transportation costs, distribution
13 tended to center around the location of the manufacturing plant.
14 The product consisted primarily of sand and white portland cement.
15 The product included between 3.3% by weight and 3.6 by weight
16 chrysotile asbestos as a component.

17 (e) This product was a white to off-white powder. It was
18 packaged and sold in sacks of 60 lbs. Each container was labeled
19 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,
20 the name of the product and directions for its use.

21 (f) This product was a dry powder, which when mixed with
22 water formed a thick paste that was used to cover radiant heating
23 cables stapled to ceiling surfaces.

24 3. Radiant Heat Scrimless Surfacing Compound

25 (a) The trade name of this product was Kaiser Gypsum Radiant
26 Heat Scrimless Surfacing Compound.

1 (b) Kaiser Gypsum began manufacturing this product in
2 California in 1972, at which time chrysotile asbestos was used as
3 a component.

4 (c) Kaiser Gypsum last manufactured Radiant Heat Scrimless
5 Surfacing Compound with chrysotile asbestos as a component in
6 1974, when the product was discontinued.

7 (d) The Kaiser Gypsum California plant that made this
8 product was located in Santa Ana, where it was manufactured from
9 1972. Because of the heavy weight of the product, the low profit
10 margin and high transportation costs, distribution tended to
11 center around the location of the manufacturing plant. The
12 product consisted primarily of sand, silica flour and mica. The
13 product included 5% by weight chrysotile asbestos as a component.

14 (e) This product was a greenish powder. It was packaged and
15 sold in sacks of 25 lbs. and in sacks of 50 lbs. Each container
16 was labeled with the name of the manufacturer, Kaiser Gypsum
17 Company, Inc., the name of the product and directions for its use.

18 (f) This product was a dry powder, which when mixed with
19 water formed a thick paste that was used to cover radiant heating
20 cables embedded in ceiling surfaces.

21 * * *

22 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)
23 applicable to all of the three radiant heating system surfacing
24 products discussed above are as follows:

25 (g) Kaiser Gypsum is unsure as to the intended meaning of
26 "The U.S. Government's 'Qualified Products List'," but has no
27 knowledge that any of its radiant heating system surfacing
28 products ever appeared on such a list.

1 (h) Kaiser Gypsum is aware of the following suppliers of
2 asbestos:

3 John K. Bice
4 Harrison & Crosfield
5 Carmonia Chemical Co.
6 Western Chemical Co.
7 Philip Carey Corp. (Carey Canadian Asbestos)
8 Johns-Manville
9 Union Carbide Corp.
10 E. S. Browning
11 Loomis Chemical Co.
12 Benson Chemical
13 Paul W. Wood (Johns-Manville)

14 Current addresses, if any, are not known to Kaiser Gypsum.
15 Most of the specific time periods during which these firms
16 supplied asbestos are unknown.

17 (i) (i through iii) Kaiser Gypsum is not aware of ever
18 selling such products to shipyards, power companies or refineries.
19 Kaiser Gypsum sold such products to non-governmental customers in
20 Northern California from approximately 1952 to 1976. These
21 customers consisted largely of building contractors or building
22 materials dealers.

23 Kaiser Gypsum has some retained sales orders and sales
24 invoices for some years which identify the purchasers of Kaiser
25 Gypsum products, the dates of sale, the amount of each product
26 sold, and, in some cases, the sites to which the products were to
27 be delivered. These documents do not distinguish between sales of
28 asbestos-containing products and other products.

(j) Sales orders and sales invoices. See also Response
to
Interrogatory 6(b).

E. Gypsum Wallboard Accessories For
Exterior Use - Asbestos Used As A Component

1 Kaiser Gypsum experimented with gypsum wallboard products for
2 use on the exterior surfaces of buildings, but those products
3 proved unsuccessful. Kaiser Gypsum never discovered a way for
4 them to be manufactured that would allow them to effectively
5 withstand the wide variety of weather and temperature conditions
6 that exterior products confront. Those exterior gypsum products
7 were marketed in several test areas and, as in the case of
8 interior gypsum drywall products, required the use of materials
9 to fill the spaces between pieces of gypsum wallboard and to
10 provide a decorative finish. Kaiser Gypsum offered products for
11 those purposes whose components included small percentages of
12 chrysotile asbestos. These products were:

- 13 1. X-Terior Premix Prefill Compound
- 14 2. X-Terior Premix Wall Texture Compound

15 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)
16 for each of these products are as follows:

17 1. X-Terior Premix Prefill Compound

18 (a) The trade name of this product was Kaiser Gypsum X-
19 Terior Premix Prefill Compound.

20 (b) & (c) Kaiser Gypsum began and ceased marketing this
21 product during 1975. Chrysotile asbestos was used as a component
22 for the brief period during which this product was manufactured.

23 (d) The Kaiser Gypsum California plant that made this
24 product was located at Antioch. The product was marketed in a
25 limited market area where exterior gypsum wallboard was being sold
26 on a test basis. Kaiser Gypsum X-Terior Premix Prefill Compound
27 was made primarily of raw gypsum, PVA emulsion and mica. The
28

1 product included 1.5% by weight chrysotile asbestos as a
2 component.

3 (e) This product was a white to off-white paste. It was
4 packaged and sold in metal cans and plastic buckets of 60 lbs.,
5 and in cartons of 48 and 60 lbs. Each container was labeled with
6 the name of the manufacturer, Kaiser Gypsum Company, Inc., the
7 name of the product and directions for its use.

8 (f) This product was a paste that was used to pre-fill
9 joints in gypsum wallboard installed on building exteriors.

10 **2. X-Terior Premix Wall Texture Compound**

11 (a) The trade name of this product was Kaiser Gypsum X-
12 Terior Premix Wall Texture Compound.

13 (b) & (c) Kaiser Gypsum began and ceased marketing this
14 product during 1975. Chrysotile asbestos was used as a component
15 for the brief period during which this product was manufactured.

16 (d) The Kaiser Gypsum California plant that made this
17 product was located at Antioch. The product consisted primarily
18 of limestone, acrylic emulsion and mica. The product included
19 1.5% by weight chrysotile asbestos as a component.

20 (e) The product was a white to off-white paste. It was
21 packaged and sold in 58-lb. metal cans, plastic buckets and
22 cartons. Each container was labeled with the name of the
23 manufacturer, Kaiser Gypsum Company, Inc., the name of the product
24 and directions for its use.

25 (f) This product was a white to off-white paste that was
26 used to provide surface texture to gypsum wallboard installed on
27 building exteriors.

1 sold, and, in some cases, the sites to which the products were to
2 be delivered. These documents do not distinguish between sales of
3 asbestos-containing products and other products.

4 (j) Sales orders and sales invoices. See also Response to
5 Interrogatory 6(b).

6 **III. Products Made At Kaiser Gypsum's Oregon Plant**

7 From 1956 to 1978 Kaiser Gypsum owned and operated a plant
8 located at St. Helens, Oregon whose basic capability was to make
9 building construction products by compressing wood fibers
10 extracted from wood chips to make various types of sheets and
11 boards.

12 **A. Firtex Products - No Asbestos Used**

13 The overwhelming majority of the products Kaiser Gypsum made
14 at its Oregon plant were sold with the trademark "Firtex." No
15 product sold under this trade name ever used asbestos as a
16 component. Firtex products included various types of materials
17 intended to provide insulation against outside temperatures or to
18 dampen noise. Such products included sheathing that was nailed to
19 walls before outer layers of bricks or siding were installed. They
20 also included sheet products for insulating roofs. They also
21 included sound deadening board that was used in partitions to
22 reduce the noise that could be heard from adjacent rooms.

23 Firtex products also included materials intended for use on
24 ceilings. One type was tiles that could be glued or tacked to
25 ceilings to reduce noise. Another group of such products was used
26 in suspended ceilings. Suspended ceilings are made by hanging a
27 wood or metal frame from the structural members of a ceiling and
28 then laying square or rectangular decorative and insulating pieces

1 into the frame. Those pieces were termed "lay-in boards." Such
2 suspended ceilings used a significant amount of the room's
3 vertical space and because that vertical space cost money to
4 build, suspended ceilings were most commonly found in commercial
5 buildings or office buildings, which typically had higher ceilings
6 than houses during the 1956-1978 period when Kaiser Gypsum made
7 the products. The Firtex line of products was quite successful,
8 and Kaiser Gypsum sold them in great volume. ::

9 **B. Mineral Fiber Products**

10 **1. Kaiser Gypsum Ordinary And 1-Hour Fire Rated**
11 **Mineral Fiberboard Products - No Asbestos Used**

12 As high-rise buildings became more common in California
13 during the 1960's, building code authorities became increasingly
14 concerned about the risks of fires in those buildings and
15 encouraged the development and use of products that were less
16 likely to burn. Since its Firtex wood-chip products would burn,
17 Kaiser Gypsum sought to develop other ceiling tile and lay-in
18 board products that would be more resistant to fire. Kaiser
19 Gypsum found that the manufacturing machinery at its St. Helens,
20 Oregon plant could be used to make ceiling tiles and lay-in boards
21 for suspended ceilings with various types of mineral wool as the
22 principal component (instead of wood chips). Mineral wool is the
23 name given to products made by heating various types of rock to
24 extremely high temperature (where they melt), spinning them into
25 threads, and then letting them cool. Mineral wool looks something
26 like steel wool that is used for rubbing rust off of metal or used
27 in certain kitchen scouring pads. Mineral wool does resist fire
28 and Kaiser Gypsum was successful in developing ceiling tiles and

1 **Mineral Fibreboard - U.L. Fire Rated**
2 **(Underwriters' Laboratories, Inc. Design)**

3 (a) The trade name of this product, a mineral fiber product,
4 was Kaiser Mineral Fibreboard - U.L. Fire Rated (Underwriters'
5 Laboratories, Inc. Design). The same product was cut into ceiling
6 tiles and lay-in boards for use in suspended ceilings. It was
7 used for acoustical ceiling tile and suspended lay-in board in
8 circumstances where a 2-hour fire resistance classification was
9 specified. Both the ceiling tiles and the lay-in boards were sold
10 under the trade name "Kaiser Mineral Fibreboard-UL Fire Rated
11 (Underwriters' Laboratories, Inc. design)."

12 (b) Kaiser Gypsum began manufacturing Mineral Fibreboard-
13 U.L. Fire Rated with chrysotile asbestos as a component in 1963.

14 (c) Kaiser Gypsum last manufactured Mineral Fibreboard-U.L.
15 Fire Rated with chrysotile asbestos as a component in 1974, when
16 the 2-hour fire-rated product was discontinued.

17 (d) The plant that made this product was located at St.
18 Helens, Oregon. This product included 1.6% by weight chrysotile
19 asbestos as a component.

20 (e) This product consisted of ceiling tiles and lay-in
21 boards with face side white or colored and with perforated or
22 fissured design for acoustical treatment. The tiles were 1/2" or
23 5/8" by 12" by 12" and the lay-in boards came in two sizes: 1/2"
24 or 5/8" by 24" by 24" and 1/2" or 5/8" by 24" by 48." They were
25 packaged and sold in boxes of various quantities. The boxes
26 contained the name of the manufacturer, Kaiser Gypsum Company,
27 Inc., the name of the product and other printed material. Kaiser
28 Gypsum's 2-hour fire-rated ceiling tiles and suspended ceiling

1 lay-in board products (in which chrysotile asbestos was used as a
2 component) were required to be specially marked because they
3 looked similar to other Kaiser Gypsum mineral fiberboard ceiling
4 tiles and lay-in boards (that did not contain asbestos as a
5 component) and building inspectors wanted to be able to check to
6 make sure that products with a 2-hour fire resistance
7 classification actually were being used by the building contractor
8 when those had been specified. It is believed that 2-hour fire-
9 rated ceiling tile and suspended ceiling lay-in board was stamped
10 on the back with either the initial "KG" or the word "Kaiser
11 Gypsum." It is believed that this marking was employed during the
12 entire period that the 2-hour fire-rated products were
13 manufactured by Kaiser Gypsum.

14 (g) Kaiser Gypsum is unsure as to the intended meaning of
15 "The U.S. Government's 'Qualified Products List'," but has no
16 knowledge that any of its 2-hour fire-rated mineral fiberboard
17 products ever appeared on such a list.

18 (h) Kaiser Gypsum is aware of the following suppliers of
19 asbestos:

20 John K. Bice
21 Harrison & Crosfield
22 Carmonia Chemical Co.
23 Western Chemical Co.
24 Philip Carey Corp. (Carey Canadian Asbestos)
25 Johns-Manville
26 Union Carbide Corp.
27 E. S. Browning
28 Loomis Chemical Co.
Benson Chemical
Paul W. Wood (Johns-Manville)

1 Current addresses, if any, are not known to Kaiser Gypsum.
2 Most of the specific time periods during which these firms
3 supplied asbestos are unknown.

4 (i) (i through iii) Kaiser Gypsum is not aware of ever
5 selling such products to shipyards, power companies or refineries.

6 Kaiser Gypsum sold such products to non-governmental customers in
7 California from approximately 1963 to 1974. These customers
8 consisted largely of building contractors or building materials
9 dealers.

10 Kaiser Gypsum has some retained sales orders and sales
11 invoices for some years which identify the purchasers of Kaiser
12 Gypsum products, the dates of sale, the amount of each product
13 sold, and, in some cases, the sites to which the products were to
14 be delivered. These documents do not distinguish between sales of
15 asbestos-containing products and other products.

16 (j) Sales orders and sales invoices. See also Response to
17 Interrogatory 6(b).

18 **IV. Types Of Products Kaiser Gypsum**
19 **Never Made And Never Marketed**

20 Kaiser Gypsum has never mined, milled or marketed asbestos.
21 Kaiser Gypsum never designed, manufactured, or marketed any
22 product in which amosite, crocidolite or other amphibole forms of
23 asbestos was used as a component. Kaiser Gypsum never designed,
24 manufactured, or marketed floor tile, pipe insulation or pipe
25 covering, refractory products, boiler insulation, acoustical
26 plaster, or sprayed fireproofing or sprayed thermal insulation
27 products. Kaiser Gypsum never designed, manufactured or marketed
28 any sort of brake products. It never designed, manufactured or

1 marketed paper products, textile products, or roofing products in
2 which asbestos was used as a component. Kaiser Gypsum never
3 designed, manufactured or marketed any products intended for use
4 in ships or shipyards, or any products intended for use in trains
5 or other railroad equipment or railroad facilities.

6 V. Null-A-Fire Type-X Gypsum Wallboard -
7 Allegedly Contaminated Vermiculite Ore

8 This part of Kaiser Gypsum's response, though not directly
9 called for by the subject interrogatories, is being made in light
10 of earlier versions of Kaiser Gypsum's responses to these
11 interrogatories and evolving knowledge, in the context of
12 historical regulatory uncertainties and disputes about whether
13 vermiculite ore used as a component in some Kaiser Gypsum Null-A-
14 Fire Type-X Gypsum Wallboard products may have been contaminated
15 in a way that caused certain workers to be exposed to airborne
16 "asbestos." Kaiser Gypsum's position is that no Kaiser Gypsum
17 Null-A-Fire Type-X Gypsum Wallboard using vermiculite ore as a
18 component could have been a substantial contributing factor to any
19 disease caused by exposure to airborne asbestos fibers.

20 As background, in 1954 Kaiser Gypsum introduced Null-A-Fire
21 brand wallboard, a 5/8" thick gypsum wallboard that was approved
22 by the Research Committee of the Pacific Coast Building Officials
23 Conference and certified by the National Board of Fire
24 Underwriters for a one-hour fire rating. This product was
25 developed in response to the appearance of California building
26 code requirements that walls in several types of public buildings
27 must have such one-hour fire resistance. The term one-hour fire
28 rating meant that, when used as a wall surface, the gypsum

1 wallboard would resist the passage of flame and heat for at least
2 one hour. The certified product had to be made in accordance with
3 Underwriters Laboratories Code No. 3543. Wallboard products that
4 were fire rated were labeled as "Type X" to distinguish them from
5 ordinary gypsum wallboard products that had not passed fire-rating
6 tests.

7 When introduced in 1954, the primary component of Kaiser
8 Gypsum's Null-A-Fire wallboard was gypsum stucco, which is the
9 gypsum plaster that forms the greatest percentage by weight of all
10 gypsum wallboard. Gypsum plaster, including wallboard stucco,
11 does not burn, and consequently, all gypsum plaster and gypsum
12 drywall construction poses less risk of fire than does wall
13 construction featuring wood or plastic paneling. However, the
14 ordinary 5/8" gypsum wallboard did not pass the one-hour fire
15 test, because the heat of the test caused the gypsum plaster to
16 shrink and crack, letting the fire through in less than an hour.
17 Kaiser Gypsum found that by adding small proportions of glass
18 fiber and perlite a board could be constructed that would resist
19 shrinking and cracking under the heat of the fire test for the
20 required one-hour period. Perlite is a very light substance,
21 white in color, that looks like puffed breakfast cereal. It is
22 often used in soil for potted plants to help keep the soil from
23 caking. Perlite is made by heating little pieces of volcanic
24 glass to very high temperatures, which causes them to pop like
25 popcorn.

26 Kaiser Gypsum continued to market its Null-A-Fire Type X
27 gypsum wallboard products that contained perlite for more than a
28 decade following their introduction in 1954. However, other

1 manufacturers introduced fire-rated wallboard products that used
2 vermiculite instead of perlite to provide added fire protection.
3 Vermiculite is a mica-like mineral found in the ground in a number
4 of places. In the 1890's it was known by gold prospectors as
5 "fool's gold," because it sparkled in the sun like precious metal.
6 Vermiculite does not weigh much, which makes it useful as a
7 component of construction materials and the melting point of
8 vermiculite is about 2500 degrees, which makes it valuable as
9 fireproofing.

10 Vermiculite consists of many layers of thin plates that have
11 small amounts of water trapped in them. When heated, the water
12 turns to steam causing these plates to expand. Such expanded
13 vermiculite is used by nurseries everywhere to help hold air and
14 moisture in plant soil so that young plants will grow faster and
15 stronger.

16 Until 1965, Kaiser Gypsum could not use vermiculite to
17 provide fire protection in gypsum wallboard, because other
18 companies had secured patents from the United States government
19 which gave them exclusive rights to use vermiculite in their
20 gypsum wallboard products. In 1965, Kaiser Gypsum secured patent
21 licenses from other companies which authorized Kaiser Gypsum to
22 begin with vermiculite in its wallboard products to provide
23 increased protection against fire. Kaiser Gypsum then began to
24 develop such wallboard products and to present them for fire-
25 testing. Since vermiculite expands when it is heated, vermiculite
26 used in a wallboard tends to offset the shrinkage that occurs in
27 gypsum when it is heated, and thus, vermiculite could serve to
28 help a wallboard to hold its shape and provide the desired fire

1 protection. Because the capacity to expand was desired, the
2 Kaiser Gypsum products used as the ingredient vermiculite that had
3 not previously been heat-expanded. This unexpanded vermiculite
4 was referred to sometimes as vermiculite ore. When testing and
5 fire code authorities recognized and certified these Kaiser Gypsum
6 products as fire-rated, or qualified to be marketed as "Type X,"
7 Kaiser Gypsum began marketing vermiculite-containing gypsum
8 wallboard under its Null-A-fire brand. Kaiser Gypsum manufactured
9 limited quantities of 1/2" Null-A-Fire Type X wallboard beginning
10 in 1967, and began manufacturing 5/8" Null-A-Fire Type X wallboard
11 in 1969. It continued to market such products until it disposed
12 of the last of its gypsum business in April 1978. Like other
13 wallboard products, those Null-A-Fire wallboards consisted
14 primarily of gypsum plaster. The formulas varied over the years
15 but the vermiculite ore percentage did not exceed 4% by weight of
16 the products.

17 Controversy concerning vermiculite reflects the regulatory
18 proposals published and regulations adopted by the U.S.
19 Occupational Safety and Health Administration ("OSHA") and the
20 responses of vermiculite companies to those government actions.
21 OSHA is a U.S government agency, created by federal legislation in
22 1970, that adopts and enforces workplace safety and health
23 regulations. OSHA has been politically controversial from the
24 beginning. California originally established a parallel state
25 program administered by its Division of Occupational Safety and
26 Health, but that agency and program were terminated several years
27 ago.
28

1 The federal OSHA undertook to regulate exposure to "asbestos"
2 in the workplace as one of its first regulatory undertakings, and
3 OSHA adopted regulations on asbestos in 1972. (See Kaiser
4 Gypsum's response to Interrogatory No. 15, below.) Thereafter, it
5 undertook to enforce those regulations. In due course, it began
6 to threaten manufacturers who used various substances other than
7 asbestos with charges of violating the OSHA asbestos exposure
8 regulations. This triggered a long-lasting legal and scientific
9 dispute concerning what minerals are "asbestos" for purposes of
10 the OSHA regulations and what minerals should be regulated like
11 asbestos even if they are not asbestos.

12 In that context, vermiculite supplier W.R. Grace & Co.
13 (hereinafter "Grace") issued an "Important Notice to Vermiculite
14 Ore Processors," dated March 17, 1976 warning that "employers of
15 workers handling vermiculite ore" should be "aware of the OSHA
16 regulations," because OSHA was applying them to Grace vermiculite
17 plants and proposed to make the regulation of dust more strict
18 under the regulations. Grace stated that the issues related to
19 vermiculite reflected a "tramp" mineral "found in vermiculite
20 deposits" named "tremolite, defined by OSHA as one of the asbestos
21 family." Disputes over these OSHA proposals persisted for years.
22 Then, on June 20, 1986, OSHA published in the Federal Register (at
23 51 Fed. Reg. 22612) a "Final Rule" that defined "asbestos" to
24 include "tremolite" and applied asbestos exposure limits and
25 warnings to tremolite. However, shortly thereafter those
26 regulations were "stayed," that is, not made effective, by OSHA as
27 to tremolite and several other minerals to prevent the federal
28 courts from deciding whether the regulations were "arbitrary and

1 capricious." (See 51 Fed. Reg. 37002; Oct. 17, 1986.) The
2 scientific and regulatory debate continued for more years until
3 OSHA published regulations in 1992 (57 Fed. Reg. 24310; June 8,
4 1992) declaring that some tremolite is "platy" or non-fibrous, and
5 "platy tremolite" would not be deemed to be asbestos.

6 However, OSHA found other tremolite was fibrous or
7 "asbestiform" and that such "asbestiform tremolite" would be
8 regulated as asbestos. OSHA further limited these regulations by
9 providing that even products with asbestiform tremolite would not
10 be subject to asbestos regulation if asbestiform tremolite "is
11 present in a product in concentrations less than 1.0 percent by
12 weight."

13 Kaiser Gypsum admits that for a limited number of years some
14 of its Null-A-Fire products contained vermiculite, but Kaiser
15 Gypsum denies that these products contained asbestiform tremolite.
16 Kaiser Gypsum further contends that any attempt under state law to
17 deem any products that have less than the amount that would
18 subject them to federal regulation to be asbestos-containing
19 products would be preempted by federal law and the Supremacy
20 Clause of the U.S. Constitution.

21 RESPONSE TO INTERROGATORY NO. 11:

22 Not applicable.

23 RESPONSE TO INTERROGATORY NO. 12:

24 Kaiser Gypsum is unaware of entering into any such rebranding
25 agreements.

26 RESPONSE TO INTERROGATORY NO. 13:

27 During 1952 Kaiser Gypsum purchased Joint Cement, Cover-Text
28 texture paint and Kaiser-Text texture paint from Wesco Waterpaints,

1 Inc., then located in Berkeley, California, that was packaged in
2 Kaiser Gypsum's name. It is unknown to Kaiser Gypsum whether
3 asbestos was used as a component of those products. During
4 December 1953, after Kaiser Gypsum began manufacturing joint
5 compounds and texture paints, Kaiser Gypsum entered into an
6 agreement with Wesco Waterpaints, Inc., then located in Berkeley,
7 California, to purchase joint cement, topping compound and texture
8 paint packaged in Kaiser Gypsum's name for a period of 90 days.
9 It is unknown to Kaiser Gypsum whether any purchases were made
10 pursuant to this agreement or whether any products purchased had
11 asbestos as a component. In an abundance of caution, Kaiser
12 Gypsum is providing the information it has obtained from its
13 records. Kaiser Gypsum has no information demonstrating that any
14 product obtained from Wesco Waterpaints, Inc. was an asbestos-
15 containing product. Kaiser Gypsum knows of no other agreement
16 entered by it that provided for rebranding any product of another
17 company's which may have been an asbestos-containing product in
18 Kaiser Gypsum's name for sale in California.

19 RESPONSE TO INTERROGATORY NO. 14:

20 Kaiser Gypsum did not purchase or acquire asbestos from the
21 "General Service Administration" or any branch or agency of the
22 United States Government.

23 RESPONSE TO INTERROGATORY NO. 15:

24 Yes, as to products marketed in 1972 or thereafter.

25 (a) Beginning in 1972, in response to regulations adopted by
26 the U.S. Occupational Safety and Health Administration (see 37
27 Fed. Reg. 11318, June 7, 1972), Kaiser Gypsum affixed caution
28 labels to the packages and containers of its asbestos-containing

1 products. The OSHA regulations requiring this label were made
2 subject to the limitation that "no label is required where
3 asbestos fibers have been modified by a bonding agent, coating,
4 binder, or other material so that during any reasonably
5 foreseeable use, handling, storage, disposal, processing, or
6 transportation, no airborne concentrations of asbestos in excess
7 of the exposure limits prescribed in paragraph (b) of this section
8 will be released." In light of then-existing ambiguities as to
9 what tests OSHA would recognize as adequate to demonstrate a
10 product's falling within this exception, Kaiser Gypsum applied the
11 caution label to all its then-manufactured products in which
12 chrysotile asbestos was used as a component.

13 Initially, the labels were four inches by eight inches in
14 size and had yellow backgrounds with red letters. They were
15 affixed to the bag or container of the product by adhesive in a
16 prominent place. Later, as new bags and containers were
17 purchased, the labels were printed onto the side of the bag or
18 container and are believed to have been the same color or colors
19 as the bag/container or the printing thereon. The label read:

20 CAUTION: contains asbestos fibers; avoid
21 creating dust; breathing asbestos dust may
22 cause serious bodily harm.

23 (b) Beginning in 1972; exact date unknown.

24 (c) This label caution remained the same during the
25 remaining time the products upon which it was used continued to
26 use asbestos as a component.

27 RESPONSE TO INTERROGATORY NO. 16:

28 Not applicable.

1 RESPONSE TO INTERROGATORY NO. 17:

2 Most of Kaiser Gypsum's products were sold in the form of a
3 powder or paste; therefore, the name of the company was on the
4 packaging of the product. However, Kaiser Gypsum's 2-hour fire-
5 rated ceiling tiles and suspended ceiling lay-in board products
6 (in which asbestos was used as a component were specially marked
7 because they looked similar to other Kaiser Gypsum mineral
8 fiberboard ceiling tiles and lay-in boards (that did not contain
9 asbestos as a component) and building inspectors wanted to be able
10 to check to make sure that 2-hour fire-rated products actually
11 were being used by the building contractor when those had been
12 specified. It is believed that each piece of 2-hour fire-rated
13 ceiling tile and suspended ceiling lay-in board was stamped on the
14 back with either the initial "KG" or the word "Kaiser Gypsum."
15 Such marking was employed during the entire period that the 2-hour
16 fire-rated products were manufactured by Kaiser Gypsum.

17 RESPONSE TO INTERROGATORY NO. 18:

18 Harlan C. Dupuis, former Manager of Research and Development,
19 was deposed on April 16, 1985, in the following case: Katherine
20 Maksim v. U.S. Gypsum, et al., San Francisco County Superior Court
21 No. 768674.

22 Melissa A. Youngman, former Secretary/Treasurer, was deposed
23 on March 4 and 5, 1993, in the following cases: Donald Breslin v.
24 ABEX, et al., San Francisco County Superior Court, Case No.
25 943928; Coy Cossey v. ABEX, et al., San Francisco County Superior
26 Court, Case No. 920148; Norma E. Olsen v. ABEX, et al., San
27 Francisco County Superior Court, Case No. 914076; Lynn Weimer v.
28 ABEX, et al., San Francisco County Superior Court, Case No.

1 914594; and Ray Person v. ABEX, et al., San Francisco County
2 Superior Court, Case No. 944872.

3 Thomas V. Smith, former Technical Supervisor for Accessory
4 Products, was deposed on March 11, 1992, in the following case:
5 Michael F. Richie, et al. v. Raybestos-Manhattan, et al., Superior
6 Court of the State of California for the County of San Francisco,
7 Civ. 933324.

8 **RESPONSE TO INTERROGATORY NO. 19:**

9 Kaiser Gypsum has no knowledge that it ever purchased or
10 otherwise acquired an asbestos-containing product line from
11 another company.

12 **RESPONSE TO INTERROGATORY NO. 20:**

13 Kaiser Gypsum has retained a number of brochures, pamphlets,
14 catalogs and other product information documents. Many of these
15 documents discuss both asbestos-containing products and other
16 products, and many of the documents are similar. For these
17 reasons, rather than attempting to identify each individual
18 document, Kaiser Gypsum will make representative documents
19 available for inspection upon reasonable notice at the offices of
20 Dillingham & Murphy, 225 Bus, 6th Floor, San Francisco,
21 California.

22 (a) through (c) - See statement above.

23 (d) To provide potential users of such products with
24 information about the products.

25 (e) Some of these documents still exist.

26 (f) See above statement.

27 (g) See Response to Interrogatory No. 6(b).

1 RESPONSE TO INTERROGATORY NO. 21:

2 Not applicable.

3 RESPONSE TO INTERROGATORY NO. 22:

4 No, not to Kaiser Gypsum's knowledge.

5 RESPONSE TO INTERROGATORY NO. 23:

6 The interrogatories define "contract unit" to "mean a branch
7 or division of a defendant which has been or is now engaged in
8 installation and/or removal of 'raw asbestos fibers' and/or
9 'asbestos-containing products'." Kaiser Gypsum never has had such
10 a unit.

11 RESPONSE TO INTERROGATORY NO. 24:

12 Not applicable.

13 RESPONSE TO INTERROGATORY NO. 25:

14 Kaiser Gypsum had product liability insurance during the
15 period of time it manufactured or sold asbestos-containing
16 products.

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1 RESPONSE TO INTERROGATORY NO. 26:

2 (a)-(d) Kaiser Gypsum is insured under a number of general
3 corporate liability insurance policies that were issued by primary
4 insurance carriers, including Truck Insurance Exchange, Fireman's
5 Fund, The Home Insurance Company and National Union Insurance
6 Company, which Kaiser Gypsum maintains provide coverage for
7 personal injury claims. Certain policy terms and conditions are
8 subject to disputes between Kaiser Gypsum and its carriers.

9 Kaiser Gypsum also believes that it is insured under a number of
10 excess liability insurance policies that were issued by a number
11 of different insurance carriers, including some that may no longer
12 be capable of responding to their obligations. The terms and
13 conditions of these excess policies may be subject to dispute.

14 Kaiser Gypsum will supplement this response in the event the
15 circumstances in a particular case may make more detailed
16 information on insurance policies of relevance, taking into
17 account the carrier and dispute resolution status pertaining at
18 that time.

19 DATE: 12/30/56

DILLINGHAM & MURPHY

20 By:

E. Jane Wells
21 PATRICK J. HAGAN, ESQ.

22 E. JANE WELLS, ESQ.

23 Attorneys for Defendant

24 Kaiser Gypsum Company, Inc.
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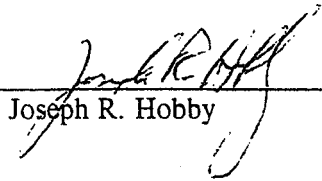
VERIFICATION

I, the undersigned say:

I have read the foregoing document; to the extent that the information set forth in the foregoing document is personally known to me, the information is true and correct to the best of my knowledge; to the extent that the information set forth in the foregoing document is not known to me but is required by law to be provided in said responses, I believe the responses to be correct; to the extent that the responses state legal objections, the responses have been prepared by my attorneys based on their work product and other information known to them, and are not within my personal knowledge.

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

Executed this 27 day of December, 1996, at San Ramon, California.



Joseph R. Hobby

Kaiser Gypsum Company, Inc.'s
Updated Responses to Plaintiffs'
Standard Interrogatories to
Defendants
In Re: San Francisco Superior Court
Complex Asbestos Litigation

1 PROOF OF SERVICE BY MAIL [C.C.P. 1013a, 2015.5]

2 I, the undersigned, declare:

3 That I am employed in the City of San Francisco, County
4 of San Francisco, State of California; that I am over the age of
5 eighteen years and not a party to the within cause; that my
6 business address is 625 Market Street, Fourteenth Floor, San
7 Francisco, California 94105-3315.
8

9 That on today's date I served the attached:

10 **KAISER GYPSUM COMPANY, INC.'S UPDATED RESPONSES TO**
11 **PLAINTIFF'S STANDARD INTERROGATORIES TO DEFENDANTS**

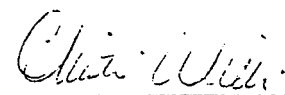
12 on the parties in said cause, by placing a true copy of each
13 document enclosed in a sealed envelope with postage thereon fully
14 prepaid, in the United States mail at San Francisco, California,
15 addressed as follows:
16

17 Alan R. Brayton, Esq.
18 Brayton Harley Curtis
19 222 Rush Landing
20 P.O. Box 2109
21 Novato, CA 96723

22 (see also attached service list)

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

25 Dated: December 30, 1996

26 
Christine Willis

IN RE COMPLEX ASBESTOS LITIGATION
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IN RE: COMPLEX ASBESTOS LITIGATION
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Revised 1/16/96

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Anning-Johnson Co./Victor Equipment Co./Cathedral Hill Hotel, Inc./Anderson, Rowe & Buckley/
Waldron, Duffy, Inc./Ireland-Robinson & Hadley, Inc./Dillingham Construction N.A., Inc./Ross Island
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 Scherba's Auto Stores, Inc.
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 Attn: Richard E. Korb Fax: 415/391-5538
 On behalf of: Ford Wholesale Co., Inc./Throwbot, Inc.
 Boughey, Garvie & Bushner, One Post St., Suite 2400, San Francisco, CA 94104 415/398-4500
 Attn: Todd J. Holcomb Fax: 415/398-2455
 On behalf of: Service Engineering Co./H&H Ship Service Co./Matthew G. Norton Co./Southwest Marine
 Bowles & Verna, 2121 N. California Blvd., Suite 875, P.O. Box 8180, Walnut Creek, 510/935-3300
 CA 94596, Attn: Robert D. Phillips, Jr. Fax: 510/935-0371
 On behalf of: Anheuser-Busch, Inc./Kilpatrick's Bakeries
 Bradley, Curley & Asiano, 150 Spear St., 12th Floor, San Francisco, CA 94105-1535 415/442-4888
 Attn: Ann M. Asiano Fax: 415/442-4884
 On behalf of: Power Engineering & Equipment Co./Inductotherm Industries, Inc.
 Branson, FitzGerald & Howard, 643 Bair Osiand Rd., Suite 400, P.O. Box 2189, 415/365-7710
 Redwood City, CA 94064-2189, Attn: Henry D. Rome Fax: 415/364-5297
 On behalf of: Synkoloid/Gow Supply Co./Valley Stucco & Putty Plant, Inc./Artra Group, Inc., Successor
 to Dutch Boy, Inc./Pine Cone Lumber Co., Inc.
 Brobeck, Phleger & Harrison, One Market Plaza, Spear Street Tower, 415/442-0900
 San Francisco, CA 94105, Attn: William P. Griffin Fax: 415/442-1010
 On behalf of: Fibreboard Corp./Atlantic Richfield/CIBA-Geigy Corp./Western MacArthur Co./
 Brobeck, Phleger & Harrison, One Market Plaza, Spear Street Tower, 415/442-0900
 San Francisco, CA 94105, Attn: John Carlson Fax: 415/442-1010
 On behalf of: L.D. Brinkman Co.
 Brobeck, Phleger & Harrison, 4675 MacArthur Court, Suite 1000, Newport Beach, 714/752-7535
 CA 92660-1846, Attn: Kathlene W. Lowe Fax: 714/752-7522
 On behalf of: Koll Real Estate Group, Inc.
 Bronson, Bronson & McKinnon, 505 Montgomery St., San Francisco, CA 94111 415/986-4200
 Attn: Lawrence M. Cirelli Fax: 415/982-1394
 On behalf of: BOC Group, Inc./Airco Gas & Gear Corp./Electrical Insulation Suppliers, Inc.
 Brown, Pistone, Hurley & Van Vlear, 8001 Irvine Center Drive, Suite 900, 714/727-0559
 Irvine, CA 92718, Attn: Michael K. Wolder Fax: 714/727-0656
 On behalf of: Advance Mechanical Contractors, Inc.
 Capps, Staples, Ward, Hastings & Dodson, 1777 Botelho Drive, Suite 100, 510/939-4411
 Walnut Creek, CA 94596, Attn: Marsha L. Stephenson Fax: 510/939-5241
 On behalf of: Graybar Electric/U.S. Borax, Inc.
 Carroll, Burdick & McDonough, 44 Montgomery St., Suite 400, San Francisco, 415/989-5900
 CA 94104, Attn: James B. Clapp/Robert G. Miller Fax: 415/989-0932
 On behalf of: McDonnell Douglas Corp./Levi Strauss & Co./Schlage Lock/C.F. Braun/Oscar E. Erickson/
 Ingersoll-Rand Co./J.P. Stevens & Co., Inc./D. Zelinsky & Sons, Inc./The Dial Corp./Superior Boiler Works
 Carroll, Burdick & McDonough, 44 Montgomery St., Suite 400, San Francisco, 415/989-5900
 CA 94104, Attn: Teke Kelley Fax: 415/989-0932
 On behalf of: Ericsson, Inc. (Anaconda)
 Carroll, Burdick & McDonough, 44 Montgomery St., Suite 400, San Francisco, 415/989-5900
 CA 94104, Attn: Roberta J. Beringer Fax: 415/989-0932
 On behalf of: St. Francis Hotel/Selas Corporation of America/Home Savings of America
 Caswell, Bell, Hillison, Burnside & Greer, 5200 N. Palm Ave., Fresno, CA 93704-2228 209/225-6550
 (Mail: P.O. Box 5259, Fresno, CA 93755-5259), Attn: Randolph Krbecek Fax: 209/225-7912
 On behalf of: Terminal Air Brake Supply, Inc.

Clapp, Moroney, Bellagamba, Davis & Vucinich, 4400 Bohannon Drive, Suite 100, 415/327-1300
 Menlo Park, CA 94025, Attn: Christopher W. Wood Fax: 415/327-3707
 On behalf of: E.V. Roberts & Associates, Inc./Acousta-Lite/Floorcraft/El Camino Parts Co./Claude Short
 Dodge/Guy F. Atkinson Co./Keystone Consolidated Industries/Power Boiler Sales, Inc./Delmer's Brakes/
 Wismer & Becker Contracting Engineers/Archie Brothers, Inc./Cleaver Brooks, A Division of Aqua-Chem/
 Pacific Mechanical Corp./Coca-Cola Co./Venton Plastering/South Bay Taping/Western States Stone Co.
 Coddington, Hicks & Danforth, 555 Twin Dolphin Dr., Suite 300, Redwood City, 415/592-5400
 CA 94065, Attn: David Levine Fax: 415/592-5027
 On behalf of: United Airlines, Inc./Hexcel Corp.
 Connor & Bishop, 870 Market St., Suite 600, San Francisco, CA 94102 415/434-3006
 Attn: Charles S. Bishop Fax: 415/434-1445
 On behalf of: Mine Safety & Appliances Co./Wabash Power Equipment Co.
 Cooper, White & Cooper, 201 California St., 17th Floor, San Francisco, CA 94111 415/433-1900
 Attn: Christopher J. Mead/John P. Makin Fax: 415/433-5530
 On behalf of: California Hydronics Corporation
 Cooper, White & Cooper, 201 California St., 17th Floor, San Francisco, CA 94111 415/433-1900
 Attn: Lawrence J. Siskind/Daniel A. Meisel Fax: 415/433-5530
 On behalf of: The Kendall Company
 Crosby, Heafey, Roach & May, 1999 Harrison Street, Oakland, CA 94612 510/763-2000
 Attn: Judie Warren Fax: 510/273-8866
 On behalf of: Chrysler Corp./AMC/Hobart Brothers Co./Delaval Steam Turbine Co./IMO Industries/
 Bridgestone/Firestone, Inc./Union Pacific Railroad Co./Lincoln Electric Co./F.P. Lathrop Construction Co.
 Crosby, Heafey, Roach & May, 1999 Harrison Street, Oakland, CA 94612 510/763-2000
 Attn: Julie Linn Fax: 510/273-8866
 On behalf of: Phillips Petroleum Co./Gaylord Container Corp./Tosco Corp./Spreckels Sugar Co.
 Cullom & Burland, 550 California St., Suite 700, San Francisco, CA 94104 415/781-7999
 Attn: Freeman D. Cullom Fax: 415/788-0335
 On behalf of: Crane Packaging/John Crane-Houdaille
 Cyril & Crowley, 456 Montgomery St., 17th Floor, San Francisco, CA 94104 415/989-1100
 Attn: Wendy J. Hannum/Mark D. Fenske Fax: 415/421-6651
 On behalf of: Colberg, Inc./TRW Corp./Moore, McCormack Resources
 Cyril & Crowley, 456 Montgomery St., 17th Floor, San Francisco, CA 94104 415/989-1100
 Attn: Michael W. Field/Mark D. Skilling Fax: 415/421-6651
 On behalf of: Pyramid Investment Corp./Transamerica Corporation/TIG Premier Insurance Co.
 Danaher, Tedford, Lagnese & Neal, P.C., 700 Capitol Place, 21 Oak Street, 203/247-3666
 Hartford, CT 06106 Fax: 203/5471321
 On behalf of: Pittsburgh Corning Corporation
 Daniels, Baratta & Fine, 1801 Century Park East, 9th Floor, Los Angeles, CA 90067 310/556-7900
 Attn: Stephanie J. Berman Fax: 310/556-2807
 On behalf of: Highland Stucco & Lime Products, Inc.
 Davidovitz & Yaron, 111 Pine Street, 12th Floor, San Francisco, CA 94111-5614 415/658-2929
 Attn: Jeffrey J. Fadeff Fax: 415/658-2930
 On behalf of: Todd Shipyard/Mervyn's/Pierce Enterprises/American Standard, Inc./Trane Co./
 Railroad Friction Products Corp./Colombini Construction
 Dewey Ballantine, 333 South Hope Street, Los Angeles, CA 90071 213/626-3399
 On behalf of: Champion International Corp. Fax: 213/625-0562
 Dickson, Carlson & Campillo, 120 Broadway, Suite 300, Santa Monica, CA 90407, 310/451-2273
 Mailing: P.O. Box 2122, Santa Monica, CA 90407-2122, Attn: Eric M. Zyla Fax: 310/451-9071
 On behalf of: R.T. Vanderbilt Co./Pfizer, Inc./American Cyanamid
 Dickson, Carlson & Campillo, 120 Broadway, Suite 300, Santa Monica, CA 90407 310/451-2273
 Mailing: P.O. Box 2122, Santa Monica, CA 90407-2122, Attn: Roxanne M. Wilson Fax: 310/451-9071
 On behalf of: Plant Insulation Company (Subic Bay only)
 Dillingham & Murphy, 625 Market Street, 14th Floor, San Francisco, 415/896-0400
 CA 94105-3315, Attn: John Dahlberg Fax: 415/882-4202
 On behalf of: AT&T Technologies/Conoco, Inc.

Dillingham & Murphy, 625 Market Street, 14th Floor, San Francisco, CA 94103-3315	415/896-0400
Attn: William K. Bissel	Fax: 415/764-1970
On behalf of: Kaiser Cement Corp./Kaiser Gypsum Co., Inc./Gasket Specialties, Inc./	
P.E. Dolan Lumber Co./Goulds Pumps, Inc.	
Drath, Clifford, Murphy, Wennerholm & Hagen, 44 Montgomery Street, Suite 1500,	415/392-3006
San Francisco, CA 94104, Attn: John M. Drath	Fax: 415/391-3348
On behalf of: USX Corp.	
Dryden, Margoles, Schimaneck, Hartman, Kelly & Wait, One California St., Suite 2600,	415/362-6715
San Francisco, CA 94111, Attn: Lawrence Margoles	Fax: 415/362-0638
On behalf of: Figgie International, Inc./Ford Motor Co./Sherwin-Williams Co./Phillips Petroleum Co./	
Mack Trucks, Inc./O'Brien Corp./Capco Pipe Co., Inc./Jaguar Cars	
Duncan, Ball, Evans & Ubaldi, 641 Fulton Avenue, Second Floor, Sacramento,	916/488-1666
CA 95825, Attn: Jerry M. Duncan	Fax: 916/488-1699
On behalf of: Mercy San Juan Hospital	
Eriksen, Arbutnot, Brown, Kilduff & Day, 530 Water St., Suite 720, Oakland,	510/832-7770
CA 94607-3746, Attn: William J. Hoback	Fax: 510/832-0102
On behalf of: B.F. Goodrich Co./Natkin & Co.	
Eriksen, Arbutnot, Kilduff, Day & Lindstrom, Inc., 20 California Street, Suite 300,	415/362-7126
San Francisco, CA 94111-4803, Attn: Andrew P. Sclar	Fax: 415/362-6401
On behalf of: Aratex/Aramark Services, Inc. (Successor-In-Interest to U.S. Industrial Glove Co.)	
Sydney E. Fairbairn, Attorney at Law, Seven Mt. Lassen Drive, Suite D-134,	415/479-0940
San Rafael, CA 94903, Attn: Sydney E. Fairbairn	Fax: 415/479-0940
On behalf of: H. Goldman & Sons	
Farella, Braun & Martel, 235 Montgomery St., 30th Floor, San Francisco, CA 94104	415/954-4400
Attn: Dennis M. Cusack/Barry T. Ryan	
On behalf of: Shorenstein Co./Rockwell International	
John D. Feeney, Southern Pacific Lines, Law Dept., 8th Floor, One Market Plaza,	415/541-1000
San Francisco, CA 94105	Fax: 415/541-1734
On behalf of: Southern Pacific Transportation Co.	
Fenton & Keller, 2801 Monterey-Salinas Highway, P.O. Box 791, Monterey, CA 93942	408/373-1241
On behalf of: Lorillard Tobacco Co.	Fax: 408/373-7219
Flynn, Delich & Wise, 580 California Street, Suite 1750, San Francisco, CA 94104	415/693-5566
Attn: Faye Lee	Fax: 415/693-0410
On behalf of: General Steamship International, Ltd.	
Folger & Levin, 275 Battery Street, 23rd Floor, San Francisco, CA 94111	415/986-2800
Attn: Julie Matlof	Fax: 415/986-2827
On behalf of: Amfac Distribution Corp./Hilton Hotels Corp.	
Christie L. Fraser, A Law Corporation, 201 Filbert Street, San Francisco, CA 94133	415/394-8880
Attn: Christie L. Fraser	Fax: 415/394-5665
On behalf of: Pan-Pacific Supply Co., Inc.	
Fredrickson, Mazeika & Grant, 550 West "C" Street, Suite 1410, San Diego,	619/234-1722
CA 92101, Attn: Tomas V. Mazeika	Fax: 619/234-1759
On behalf of: University Mechanical & Engineering Contractors	
Freeburg, Judy & Nettels, 600 South Lake Avenue, 2nd Floor,	818/585-4150
Pasadena, CA 91106-3955, Attn: J. Lawrence Judy	Fax: 818/585-0718
On behalf of: Flintkote/Genstar/Blue Diamond	
Frost & Healy, 1930 Sonoma Blvd., Vallejo, CA 94590, Attn: Norbert U. Frost	707/643-5696
On behalf of: Napa Glove Co., Inc.	Fax: 707/643-1910
Gallawa, Brown, Kroesch & Kauffroath, 2207 J Street, Sacramento, CA 95816	916/444-9364
Attn: Walter Gallawa	Fax: 916/444-5921
On behalf of: Amsted Industries/Griffin Wheel Co.	
Gardiner, Koch & Hines, 53 West Jackson Blvd., Suite 1550, Chicago, IL 60604	312/362-0000
Attn: Tom Gardiner	Fax: 312/362-0440
On behalf of: Ellis Corporation	
Gianelli & Fores, 1014 16th Street, P.O. Box 3212, Modesto, CA 95353	209/521-6260
Attn: Robert P. Fores	Fax: 209/521-5971
On behalf of: Motor Parts Distributors	

Gibson, Dunn & Crutcher, One Montgomery Street, San Francisco, CA 94104 415/393-8200
 Attn: William D. Connell Fax: 415/986-5309
 On behalf of: Champion International Corp.
 Gilles, Nicora, Minor & Sullivan, 30 Ragsdale Drive, Suite 201, 408/373-5900
 Monterey, CA 93940, Attn: Timothy J. Minor/Steven D. Penrose Fax: 408/373-5991
 On behalf of: Morton International, Inc./Thiokol Corporation
 Glaspy & Glaspy, 100 Pringle Avenue, Suite 750, Walnut Creek, CA 94596 510/947-1300
 Attn: David W. White Fax: 510/947-1594
 On behalf of: Garlock, Inc./Colt Industries/The Mills Building/Fairmont Hotel Co./Sacramento Tires,
 Batteries & Accessories/Anchor Packing Co./Lockheed Shipbuilding Co./Tri Valley Growers/Paccar
 Glaspy & Glaspy, 353 Sacramento St., Suite 1500, San Francisco, CA 94111 415/398-8261
 Attn: Brian S. O'Malley Fax: 415/398-4416
 On behalf of: Morrison Knudsen Corp.
 Glynn, Cella & Lange, 100 Pringle Avenue, Suite 600, Walnut Creek, CA 94596 510/210-2800
 Attn: James D. Luhmann Fax: 510/945-1975
 On behalf of: E.I. du Pont de Nemours & Co.
 Goldstein & Phillips, One Embarcadero Center, 8th Floor, San Francisco, CA 94111
 On behalf of: Norca Corp.
 Gordon & Rees, 275 Battery St., 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Richard D. Fike Fax: 415/986-8054
 On behalf of: Nebraska Boiler Co., Inc./J.W. & Sons/L.N. Curtis & Sons/Western Building Materials/
 Fraser-Edwards Co./Holloway & Freeman, Inc.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Sara Spees Fax: 415/986-8054
 On behalf of: Dow Coming Corp.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Michael T. Lucey/S. Mitchell Kaplan Fax: 415/986-8054
 On behalf of: Bendix (Allied Corp.)/Allied-Signal, Inc.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Michael T. Lucey Fax: 415/986-8054
 On behalf of: FOSECO, Inc.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Jewel Kolling Basse Fax: 415/986-5900
 On behalf of: Union Oil of California (UNOCAL)
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: Thomas C. Crosby Fax: 415/986-8054
 On behalf of: Triple A Machine Shop/Eastco/Industrial Safety Corp.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: P. Gerhardt Zacher/Richard D. Fike Fax: 415/986-8054
 On behalf of: Rapid American Corp.
 Gordon & Rees, 275 Battery Street, 20th Floor, San Francisco, CA 94111 415/986-5900
 Attn: P. Gerhardt Zacher/Thomas C. Crosby Fax: 415/986-8054
 On behalf of: W.R. Grace & Co. - Conn.
 Grace, Skocypiec, Cosgrove & Schirm, 5700 Wilshire Blvd., Suite 300H, Los Angeles, 213/487-6660
 CA 90048, Attn: Philip R. Cosgrove 444 South Flower, 11th Fl. 90071 Fax: 213/487-4896
 On behalf of: General Motors Corporation
 Graham & James, One Maritime Plaza, 3rd Floor, San Francisco, CA 94111 415/954-0200
 Attn: Andrew I. Port Fax: 415/391-2493
 On behalf of: Sealift, Inc./Mobil Oil/Goodyear Tire & Rubber Co./Amerada Hess/Alcoa Co./Hendy International/
 Matson Navigation Co./Pacific Coast Shipping/Waterman Steamship Co./Chevron/Weyerhaeuser/Lykes Bros./
 Crowley Maritime Co./National Bulk Carriers/Mormac Marine/Sea-Land Service, Inc./Victory Carriers/
 Keystone Shipping Co./Delta Lines/Central Gulf Shipping/Marine Transport Lines/Farrell Transport Lines/
 Nedlloyd Lines/Bay Tankers/Interocean Management/Maritime Overseas Corp./OMI Bulk Management Co./
 Standard Oil of California/West Coast Shipping Co./Watters Marine, Inc./Pacific Dry Dock/Apex Marine/
 American President Lines/Global Marine Drilling/Pacific Gulf Marine
 Gudmundson, Siggins, Stone & Skinner, One Embarcadero Center, Suite 1350, 415/391-4200
 San Francisco, CA 94111, Attn: Richard J. Siggins Fax: 415/989-4739
 On behalf of: American Cyanamid

Haight, Brown & Bonesteel, 201 Sansome St., Suite 300, San Francisco, CA 94104 415/986-7700
 Attn: Lisa L. Oberg Fax: 415/986-6945
 On behalf of: CCR Defendants/Ohio Locomotive Crane Co./Lord Corporation/MCA/Universal City Studios, Inc./
 San Francisco Sourdough Bakeries, Inc./Tarkett, Inc.
 Hake & Joyce, 100 Spear Street, Suite 310, San Francisco, CA 94105 415/512-7100
 Attn: William M. Hake Fax: 415/512-7103
 On behalf of: Avon Products, Inc./Diamond Walnut Growers, Inc.
 Hancock, Rothert & Bunshoft, Four Embarcadero Center, 10th Floor, San Francisco, 415/981-5550
 CA 94111, Attn: James P. Barber, Merton A. Howard Fax: 415/955-2599
 On behalf of: Borden, Inc./American Suzuki Motor Corp.
 Hancock, Rothert & Bunshoft, Four Embarcadero Center, 10th Floor, San Francisco, 415/981-5550
 CA 94111, Attn: Ray L. Wong Fax: 415/955-2599
 On behalf of: General Cable/American Premier Underwriters
 Hanna, Brophy, MacLean, McAleer & Jensen, 595 Market Street, Suite 900, 415/543-9110
 San Francisco, CA 94105, Attn: Neville H. McGilchrist Fax: 415/896-0901
 On behalf of: Manville Sales Corp./Del Monte Foods
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131
 94612, Attn: Eugene Brown, Jr. Fax: 510/839-7940
 On behalf of: Oakfabco/Harwick Chemical Corp./Complete Auto Parts/Hartford Fire Insurance/
 Hartford Accident & Indemnity Co./University of Southern California/E.D. Bullard/Bell Industries/
 J.H. Fitzmaurice, Inc./Kahala Hilton Hotel/Mortell Company
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131
 94612, Attn: Peter A. Strotz Fax: 510/839-7940
 On behalf of: ICI Composites, Inc./ICI Americas, Inc.
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131
 94612, Attn: Bruce McLeod/Stephen J. Valen Fax: 510/839-7940
 On behalf of: Rhone-Poulenc Basic Chemicals Co. (Stauffer Chemical)
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131
 94612, Attn: Bruce McLeod/Peter A. Strotz Fax: 510/839-7940
 On behalf of: The Dow Chemical Company
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131
 94612, Attn: Marshall A. Thompson Fax: 510/839-7940
 On behalf of: Alta Building Materials Company
 Hardy Erich Brown & Wilson, 1000 G Street, Sacramento 95814, Mailing: P.O. Box 916/449-3800
 13530, Sacramento, CA 95853-4530, Attn: Brian Charter Fax: 916/449-3888
 On behalf of: Goodyear Tire & Rubber Co./The Dexter Corporation/McPhail's, Inc.
 Brett R. Harrell, P.O. Box 1130, Modesto, CA 95353 209/579-3717
 On behalf of: E. & J. Gallo Winery Fax: 209/579-3719
 Harrington, Foxx, Dubrow & Canter, 611 W. Sixth St., 30th Floor, Los Angeles, CA 213/489-3222
 90017, Attn: William H. Finney Fax: 213/623-7929
 On behalf of: Ford Motor Co./Navistar International Transportation Co.
 Hassard Bonnington, Two Embarcadero Center, Suite 1800, San Francisco, CA 415/288-9800
 CA 94111-3993, Attn: Robert M. Hamblett Fax: 415/288-9801
 On behalf of: Kaiser Hospitals, Inc./El Camino Hospital/Golden Gateway Building Co./Golden Gateway
 Holding Corp./Perini Land & Development Co./Paramount Development Assoc.
 Hefner, Stark & Marois, 2710 Gateway Oaks Drive, Suite 300 South, Sacramento, 916/925-6620
 CA 95833, Attn: Stephen S. Talt Fax: 916/925-1127
 On behalf of: Kirkhill Rubber Company
 Heller, Ehrman, White & McAuliffe, 333 Bush Street, San Francisco, CA 94104-2878 415/772-6000
 Attn: Ann G. Grimaldi Fax: 415/772-6268
 On behalf of: Wiegmann & Rose International/Pennzoil Company
 Hill, Farrer & Burrill, 445 South Figueroa Street, 35th Floor, Los Angeles, CA 90071 213/620-0460
 Attn: Craig J. Whitney Fax: 213/624-4840
 On behalf of: Atchison, Topeka & Santa Fe Railroad Co.
 Hill, Genson, Even, Crandall & Wade, 505 Shatto Place, Los Angeles, CA 90020 818/999-4811
 Attn: Gene Genson Fax: 213/380-8946
 On behalf of: Uniroyal, Inc.

Hoge, Fenton, Jones & Appel, Inc., 60 South Market St., Suite 1400, San Jose, 408/287-9501
 CA 95113-2396, Attn: Nora Frimann Fax: 408/287-2583
 On behalf of: The Austin Company/American Rubber Manufacturing Co./Container Corp. Of America
 Howarth & Smith, 700 South Flower Street, Suite 2900, Los Angeles, CA 90017 213/955-9400
 Attn: Thomas F. Vandenburg Fax: 213/622-0791
 On behalf of: Georgia-Pacific Corporation
 Howrey & Simon, 550 South Hope Street, Suite 1400, Los Angeles, CA 90071 213/892-1800
 Attn: Kathryn M. Conway Fax: 213/892-2300
 On behalf of: Mohawk Flush Doors, Inc.
 Hudgins & Hunt, 135 Main Street, Suite 1350, San Francisco, CA 94105 415/979-0100
 Attn: Kevan T. Hunt Fax: 415/979-0747
 On behalf of: Uniroyal, Inc.
 Law Offices of Michael R. Hudson, 500 Sansome Street, Suite 601, 415/882-1556
 San Francisco, CA 94111, Attn: Michael R. Hudson Fax: 415/986-1430
 On behalf of: Skinner Corporation
 Hyde & Holcomb, 1646 North California Blvd., Suite 550, Walnut Creek, CA 94596 510/939-7700
 Attn: Patrick J. Hyde Fax: 510/939-2248
 On behalf of: The Clorox Company
 Timothy M. Hyden, Attorney at Law, 18 Crow Canyon Ct., #380, San Ramon, CA 94583 510/831-0636
 On behalf of: Economy Rubber & Gasket, Inc. Fax: 510/831-8483
 Imai, Tadlock & Keeney, 180 Montgomery St., Suite 1000, San Francisco, CA 94104 415/989-8687
 Attn: Robert C. Keeney/Edgar Hawkyard Fax: 415/989-7640
 On behalf of: A.W. Chesteron Co./George Raymond Co./Raymond Interior Systems-North
 Imai, Tadlock & Keeney, 180 Montgomery St., Suite 1000, San Francisco, CA 94104 415/989-8687
 Attn: Theodore T. Cordery
 On behalf of: See's Candies/Campbell Soup Co./Simpson Paper Co./Humboldt Bay Pulp Co./
 Elliott Co./Rich-Tex, Inc./Basic Vegetable Products/James River Corp./Anchor Hocking Co.
 Jackson, Tufts, Cole & Black, 650 California Street, San Francisco, CA 94108 415/433-1950
 Attn: Lynn A. Starr Fax: 415/392-3494
 On behalf of: Fort Kent Holdings, Inc.
 Jackson & Wallace, 580 California Street, 15th Floor, San Francisco, CA 94104 415/982-6300
 Attn: John R. Wallace Fax: 415/982-6700
 On behalf of: New York Life Insurance Co./Fluor Corp./Radiator Specialty/Landor & Associates/Ferro Corp./
 Kraft General Foods, Inc./Milwhite, Inc./M. Slayen & Associates/Republic Supply Co./Fraser's Boiler Service/
 The Okonite Co./Plant Insulation Co./Armco, Inc./Chicago Firebrick Co./Alfred Dunhill of London/Wale
 Apparatus Co./Hamon Cooling Tower Co./Bethlehem Apparatus/Crown Zellerbach International, Inc.
 Jaffe, Trutanich, Scatena & Blum, 155 Sansome Street, Suite 700, San Francisco, 415/397-9006
 CA 94104, Attn: Michelle M. Lambre Fax: 415/397-1339
 On behalf of: KSC Recovery
 Jedeikin, Green, Meadows & Schneider, 300 Montgomery Street, Suite 450, 415/781-7050
 San Francisco, CA 94111, Attn: Joseph Jedeikin Fax: 415/421-5658
 On behalf of: City National Bank/Sunset Homes, Inc./Bryan Steam Corp./E. & J. Gallo Winery/Heublein/
 Beaulieu Vineyards
 Jeffrey & Heinemann, 685 Market Street, Suite 330, San Francisco, CA 94105 415/543-8970
 On behalf of: Burnham Corporation Fax: 415/543-2670
 Jones, LaMore, Brazier & Riddle, 1570 The Alameda, Suite 150, San Jose, CA 408/280-6800
 95126-2306, Attn: James C. Jones Fax: 408/275-6284
 On behalf of: Caterpillar, Inc.
 Jordan, Keeler & Seligman, Two Embarcadero Center, 19th Floor, 415/397-4600
 San Francisco, CA 94111-3984, Attn: David H. Gartshore Fax: 415/392-2059
 On behalf of: Stone & Webster Engineering Corporation
 Kaufman & Logan, 111 Pine Street, Suite 1300, San Francisco, CA 94111 415/392-6677
 Attn: Peter J. Logan Fax: 415/391-4639
 On behalf of: First Interstate Bank
 Keck, Mahin & Cate, One Maritime Plaza, 23rd Floor, San Francisco, CA 94111-3577 415/392-7077
 Attn: Robert E. Paterson Fax: 415/392-3965
 On behalf of: Abex Corporation/Wheelabrator Group, Inc.

Keesal, Young & Logan, Four Embarcadero Center, Suite 1500, San Francisco, 415/989-0616
 CA 94111, Attn: Robert A. Bleicher Fax: 415/981-7729
 On behalf of: Lear Siegler Diversified Holdings Corp./Progresso Foods Co./Pullman Standard, Inc./
 Tillie Lewis Foods, Inc./Tishman Realty Construction Co./The Pullman Company
 Kenney, Burd & Markowitz, Two Embarcadero Center, Suite 470, San Francisco, 415/397-3100
 CA 94111, Attn: Stephen C. Kenney Fax: 415/397-3170
 On behalf of: BP Chemicals
 Kinder, Wuerfel & Cholakian, 555 Montgomery St., 9th Floor, San Francisco, 415/398-1551
 CA 94111, Attn: Edwin S. Nakagawa Fax: 415/398-3301
 On behalf of: Yoliand Materials Co.
 Kinsella, Boesch, Fujikawa & Towle, 1901 Avenue of the Stars, 7th Floor, 310/201-2000
 Los Angeles, CA 90067, Attn: Leonard M. Tavera Fax: 310/284-6020
 On behalf of: Parker-Hannifin Corp./EIS Division
 Knight, Boland & Riordan, 88 Kearny Street, Suite 1310, San Francisco, CA 94104 415/362-0684
 Attn: Samuel G. Ware Fax: 415/956-2750
 On behalf of: Metropolitan Life Insurance Co.
 Knox, Lemmon, Anapolsky & Sheridan, 300 Capitol Mall, Suite 1170, Sacramento, 916/448-9911
 CA 95814, Attn: Susan J. Sheridan Fax: 916/448-2566
 On behalf of: Kenworth Trucking Co.
 Knox Rickson, 1999 Harrison Street, Suite 1700, Oakland, CA 94612 510/893-1000
 Attn: Stephen S. Harper Fax: 510/446-1946
 On behalf of: Combustion Engineering/Syntex Corp./Oshkosh Truck Corp./Meyers Chemicals/
 Wells Fargo Bank/Glidden Co./Southwestern Portland Cement
 Lafayette, Kumagai & Clarke, 100 Spear St., Suite 400, San Francisco, CA 94105 415/357-4600
 Attn: Kevin M. Clarke Fax: 415/896-0683
 On behalf of: Procter & Gamble/Folger Coffee Co./Kmart Corporation
 La Follette, Johnson, De Haas, Fesler & Ames, 50 California Street, 35th Floor, 415/433-7610
 San Francisco, CA 94111, Attn: Joanne Rosendin Fax: 415/392-7541
 On behalf of: Grefco, Inc./General Refractories Co.
 La Follette, Johnson, De Haas, Fesler & Ames, 50 California Street, 35th Floor, 415/433-7610
 San Francisco, CA 94111, Attn: Kelley Reid Fax: 415/392-7541
 On behalf of: Gentex Corp.
 Landels, Ripley & Diamond, 350 Steuart Street, San Francisco, CA 94105-1250 415/788-5000
 Attn: Morgan Gilhuly Fax: 415/788-7550
 On behalf of: J.R. Simplot/Stanford University Hospital/Stanford University
 Lane Powell Spears & Lubersky, Two Embarcadero Center, Suite 2330, 415/421-8624
 San Francisco, CA 94111, Attn: Kevin C. Mayer Fax: 415/421-8625
 On behalf of: Hercules, Inc./Mobil Oil Corp./Hofmann Co./Chevron/Ashland, Inc.
 Larson & Burnham, 1901 Harrison St., 11th Fl., Oakland 94612, Mailing: P.O. Box 119, 510/444-6800
 Oakland, CA 94604, Attn: Walter Rundin Fax: 510/835-6666
 On behalf of: D.W. Nicholson Corp./Golden Gate Drywall, Inc./State Shingle Co./Jack Horton Drywall, Inc./
 McGuire & Hester/General Veneer Mfg. Co./Hyatt Corp./Frank E. Connell & Son/Coast Sheet Metal/
 J&H Marine & Industrial Engineering Co./California Drywall Co./Walworth Co./Prudential Insurance Co./
 Carter Construction Co./Daniel Smith Plastering, Inc./Victor Kemp Co./Frederick Meiswinkel, Inc./
 Whittaker Corp./Borg-Warner Corp./Mannington Mills/Hilton Hotels Corp./California Shingle & Shake Co./
 Goodman Lumber Co./Baker's Pride Oven Co., Inc./Great Western Bank/Medallion Carpets/Univar Corp./
 Reynolds Metals Co./W.F. Hayward Co./Fruehauf Trailer Corp./Borg-Warner Automotive, Inc./
 Central Supply Co.
 Le Bouef, Lamb, Greene & MacRae, One Embarcadero Center, San Francisco, 415/951-1100
 CA 94111, Attn: Lorraine A. Barrabee Fax: 415/951-1180
 On behalf of: Alcoa Company
 Lemieux & O'Neill, 200 North Westlake Blvd., Suite 100, Westlake Village, 805/495-4770
 CA 91362-3755, Attn: Tari L. Cody Fax: 805/495-2787
 On behalf of: OFCCO Construction, Inc. (Oil Field Construction Company, Inc.)
 Lewis, D'Amato, Brisbois & Bisgaard, 221 North Figueroa Street, Suite 1200, 213/250-1800
 Los Angeles, CA 90012, Attn: Steven Mark Levy Fax: 213/250-7900
 On behalf of: American Standard, Inc./Prudential Insurance

Liebman, Reiner, & Walsh, 3255 Wilshire Blvd., 12th Floor, Los Angeles, CA 90010, Attn: Craig Nelson Fax 213/387-0777
 On behalf of: Riverside Cement Co. (Amcord, Inc.) Fax 213/383-6754
 Lossing & Elston, 100 First Street, 25th Floor, San Francisco, CA 94105 Fax 415/882-4200
 Attn: Kevin Gray Fax 415/882-4050
 On behalf of: Hunt-Wesson, Inc. Fax 415/981-6630
 Low, Ball & Lynch, 601 California Street, San Francisco, CA 94108 Fax 415/982-1634
 Attn: Celeste M. Scott
 On behalf of: Beck Electric Supply/J.A. Sexauer/The Montague Co./Groeniger & Co./Scott Company/
 Moore Dry Dock Co./E.F. Mitchler/San Jose Drywall Corp./Atlas Heating & Ventilating Co., Ltd./
 Johnson & Mape Construction Co./Douglass Insulation Co., Inc./The Branson School/Sono-Ceil Co./
 MBL, Inc./John Ray Co./Dyson-Kissner-Moran Corp./Brown Sheet Metal & Mechanical/Coen Co./
 Darcoid Company of California/Pearl's Auto Supply, Inc.
 Lynch, Loofbourrow, Gilardi & Grummer, 50 Francisco Street, Suite 400, San Francisco, CA 94133, Attn: Robert V. Betette Fax 415/397-2800
 On behalf of: C.D. Erickson Co., Inc./California State Automobile Association/Shamrock Materials, Inc./
 Wright-Austin Co., Inc./Masonite Corp./A.P. Green Services, Inc./American Biltrite, Inc./Swinerton & Walberg/
 Van Bokkelen Cole Co./J.C. Penney Co., Inc. Fax 415/397-0937
 Mackenroth Ryan Jacobson Fong, 1610 Arden Way, Suite 250, Sacramento 95815, 916/924-1912
 Mailing: P.O. Box 255800, Sacramento, CA 95865, Attn: James R. Wright Fax 916/923-3872
 On behalf of: Deere & Company
 Marron, Reid & Sheehy, 601 California Street, Suite 1200, San Francisco, CA 94108, Attn: Michael Marron Fax 415/434-0800
 On behalf of: Georgia-Pacific/Colonial Sugar & Refining, Ltd. Fax 415/986-1374
 McCutchen, Doyle, Brown & Enersen, Three Embarcadero Center, San Francisco, CA 94111, Attn: Patricia Thrash Fax 415/393-2000
 On behalf of: Shapell Industries, Inc./U.S. Steel/C&H Sugar Co./James River II, Inc./Atlantic Richfield/
 American President Lines/McKesson Corp./Catholic Healthcare West Fax 415/393-2286
 McCutchen, Doyle, Brown & Enersen, 1331 N. California Blvd., 5th Fl., Walnut Creek, CA 94596, Mailing: P.O. Box V, Walnut Creek, CA 94596, Attn: Susan A. Ogdie Fax 510/975-5331
 On behalf of: Exxon Corp./Texaco, Inc./Coastal West Ventures/Domtar Gypsum America, Inc./
 Bombardier, Inc./Auburn Technology, Inc. Fax 510/975-5390
 McGlynn, McLorg & Ritchie, 177 Steuart St., Suite 200, San Francisco, CA 94105 Fax 415/543-9000
 Attn: Craig M. Stainbrook Fax 415/543-8300
 On behalf of: Ross General Hospital/The Clorox Co. Fax 510/465-7100
 McInerney & Dillon, One Kaiser Plaza, 18th Floor, Oakland, CA 94612 Fax 510/465-8556
 Attn: Carol K. Watson
 On behalf of: University Mechanical & Engineering Contractors Fax 510/835-3400
 McLemore, Collins & Toschi, 200 Webster Street, Suite 350, Oakland, CA 94607 Fax 510/835-7800
 Attn: Gregory M. Doyle
 On behalf of: Northwestern Equipment & Supply Co., Inc. Fax 510/939-5330
 McNamara, Houston, Dodge, McClure & Ney, 1211 Newell, Suite 202, Walnut Creek, CA 94596, Mailing: P.O. Box 5288, Walnut Creek, CA 94596, Attn: Thomas E. Pfalzer Fax 510/939-0203
 On behalf of: St. Joseph's Hospital/Congoleum/Dap, Inc./Pliibrico Sales & Service, Inc./Sutter Memorial
 Hospital/Sutter General Hospital/FMC Corp./Dameron Hospital/American Terrazzo Co. Fax 510/939-5330
 McNamara, Houston, Dodge, McClure & Ney, 1211 Newell, Suite 202, Walnut Creek, CA 94596, Mailing: P.O. Box 5288, Walnut Creek, CA 94596, Attn: Douglas C. McClure Fax 510/939-0203
 On behalf of: Uniroyal, Inc.
 Mendes & Mount, 725 South Figueroa Street, 19th Floor, Los Angeles, CA 90017 Fax 213/955-7700
 Attn: Suzanne N. McNulty/Richard Nelson Fax 213/955-7725
 On behalf of: Lockheed Corp./BP Chemicals (HITCO)/Curtis-Wright Corp. Fax 408/292-1765
 Miller, Morton, Caillat & Nevis, 50 W. San Fernando St., Suite 1300, San Jose, CA 95113, Attn: Pamela J. Silberstein Fax 408/292-4484
 On behalf of: B.T. Mancini Co., Inc./Brookman Co. Fax 415/391-6182
 Misciagna & Colomatto, 27 Maiden Lane, 4th Floor, San Francisco, CA 94108 Fax 415/391-2904
 Attn: P. Richard Colomatto
 On behalf of: Metalclad Insulation Co.

Mitchell, Silberberg & Knupp, 11377 West Olympic Boulevard, Los Angeles, CA 90064-1683, Attn: Hayward J. Kaiser	310/312-2000 Fax: 310/312-3100
On behalf of: Shapco, Inc.	
Moore & Associates, One Embarcadero Center, Suite 1200, San Francisco, CA 94111 Attn: Robert Moore	415/394-7004 Fax: 415/981-1592
On behalf of: Claremont Hotel Corporation	
Morgenstein & Jubelirer, One Market Plaza, Spear Street Tower, 32nd Floor, San Francisco, CA 94105, Attn: Charles LaGrave	415/896-0666 Fax: 415/896-5592
On behalf of: Owens-Illinois/Crosby Steam & Valve Co./Cathedral Hill Hotel, Inc./San Francisco Ladies' Protection & Relief Society/Libbey-Owens-Ford/Pilkington Aerospace/Sammons/Dixon Boiler Works, Inc.	
Morton & Lacy, Three Embarcadero Center, Suite 2280, San Francisco, CA 94111 Attn: Alan E. Lacy	415/296-9000 Fax: 415/398-3205
On behalf of: E.H. O'Neill Co., Inc./J.E. Steigerwald	
Munger, Tolles & Olson, 33 New Montgomery Tower, 19th Floor, San Francisco, CA 94105-9781, Attn: M. Elizabeth Deane	415/512-4000 Fax: 415/512-4077
On behalf of: Tennessee Gas Pipeline Company	
Nicol & Isaac, 4002 22nd Street, San Francisco, CA 94114, Attn: Lisa Nicol	415/821-4497
On behalf of: California Safety & Supply Co.	Fax: 415/821-0791
O'Brien & Hammond, 220 Sansome St., 7th Floor, San Francisco, CA 94104 Attn: James D. Hammond	415/362-2040 Fax: 415/362-1050
On behalf of: LaSalle Deitch Co., Inc./Universal Foods Corp./Nabisco Brands/B.F. Goodrich	
O'Connor, Cohn, Dillon & Barr, 101 Howard St., 5th Floor, San Francisco, CA 94105 Attn: Mark Oium	415/281-8888 Fax: 415/281-8890
On behalf of: Federal-Mogul Corp./Vallen Safety Supply Co./AlliedSignal (Allied Chemical)/Vapor Corp./ Walgreen Co.	
Orrick, Herrington & Sutcliffe, 400 Sansome Street, San Francisco, CA 94111 Attn: James R. Madison	415/392-1122 Fax: 415/773-5759
On behalf of: Grove Valve & Regulator Co.	
Otis & Hogan, One Maritime Plaza, Suite 1600, San Francisco, CA 94111-3506 Attn: J. Morrow Otis	415/362-4442 Fax: 415/362-7332
On behalf of: WTI Rust Holdings, Inc./Rust Industrial Services, Inc./Ralph M. Parsons Co.	
Pace Drywall, Legal Department, P.O. Box 573, Concord, CA 94522	510/602-0900 Fax: 510/602-0905
Pacific Bell Legal Dept., 140 New Montgomery Street, Suite 1015, San Francisco, CA 94105, Attn: Gerard J. Donnellan	415/542-2880 Fax: 415/882-4458
Paetzold, White & Brodsky, 101 California St., Suite 1875, San Francisco, CA 94104 Attn: Cheryl Brodsky	415/249-0966 Fax: 415/249-0964
On behalf of: Chiquita Brands/American President Lines/E.J. Bartells Co./Phelps Dodge Industries/ Todd Shipyards	
Pave, McCord, Jacobs & Berkes, 15303 Ventura Boulevard, Suite 1400, Sherman Oaks, CA 91403, Attn: Mark W. Lau	818/783-8820 Fax: 818/783-0959
On behalf of: California Portland Cement Co./CalMat Co./Industrial Asphalt	
Perkins Coie, 1999 Avenue of the Stars, 9th Floor, Los Angeles, CA 90067-6109 Attn: Sibyl D. Marshall	310/788-9900 Fax: 310/788-3399
On behalf of: Custodis-Cottrell, Inc.	
Pillsbury, Madison & Sutro, 225 Bush St., San Francisco 94104; Mailing: P.O. Box 7880, San Francisco, CA 94120, Attn: Marte Bassi	415/983-1000 Fax: 415/38-2096
On behalf of: Bethlehem Steel Corp.	
Pillsbury, Madison & Sutro, 400 Capitol Mall, Suite 1700, Sacramento, CA 95814 Attn: Benjamin Webster/Frank Sieglitz	916/441-0868 Fax: 916/441-3583
On behalf of: Aerojet General Corp.	
Pittsburgh Corning Corporation, 800 Presque Isle Dr., Pittsburgh, PA 15239 Attn: Gerald A. DeSimone	412/733-3838 Fax: 412/733-5849
Pond, Shjeflo & Wohl, 1730 S. El Camino Real, 6th Floor, San Mateo, CA 94402 Attn: Michael A. Fox	415/341-2901 Fax: 415/341-2258
On behalf of: Thorpe Insulation Co.	

Popelka, Allard, McCowan & Bondonno, 160 W. Santa Clara St., 12th Floor, 408/298-6611
 San Jose, CA 95113-1721, Attn: John P. Cardosi Fax: 408/275-0814
 On behalf of: Giampolini & Company
 Porter, Scott, Weiberg & Delehant, 350 University Avenue, Suite 200, Sacramento, 916/929-1481
 CA 95865, Attn: Elisa Ungerman Fax: 916/927-3706
 On behalf of: Economy Lumber Co./Minton's Lumber & Supply Co./ANCO Insulations, Inc.
 Porter, Scott, Weiberg & Delehant, 350 University Avenue, Suite 200, Sacramento, 916/929-1481
 CA 95865, Attn: Craig A. Caldwell Fax: 916/927-3706
 On behalf of: Van Housen Auto Parts
 Pray, Price, Williams & Russell, 555 East Ocean Boulevard, Suite 810, 310/436-1231
 Long Beach, CA 90802-5055, Attn: Bruce Bothwell Fax: 310/435-6384
 On behalf of: Bay Cities Crane & Rigging, Inc.
 Preuss, Walker & Shanagher, 595 Market St., 16th Floor, San Francisco, CA 94105 415/978-2600
 Attn: Thomas W. Pulliam, Jr. Fax: 415/978-2613
 On behalf of: American Honda Motor Co., Inc./Marsh & McLennan, Inc./Lac d'Amiante du Quebec, Ltee/
 Hollingsworth & Vose/Monsanto Co./Hobart Corp./Federated Metals-ASARCO
 Prindle, Decker & Amaro, 369 Pine Street, Suite 800, San Francisco, CA 94104 415/788-8354
 Attn: Mary Kirk Hillyard Fax: 415/788-3625
 On behalf of: Auburn Manufacturing Co./A.B. Boyd Co./Argo International Corp./Bode Gravel Co./
 Wheeler Protective Apparel/J.T. Thorpe, Inc./J.T. Thorpe & Son, Inc./Hajoca Corp./M.H. Detrick Co./
 Frederick Meiswinkel, Inc./D. Cummins Corp./Gerber Products, Inc./Syd Carpenter Marine Contractors/
 Pacific Bell/Lockheed Corp./Tri Valley Growers/Playboy Enterprises/Mervyn's/Gillon Lumber Co./Feuer Corp./
 Gangi Brothers-Packing Co./Henry Vogt Machine Co./Geyser Peak Winery/Familian Corp./Southern Talc/
 American Housing Guild/Bird Corp./Boise Cascade/Mayta & Jensen/Powerline Oil Co./Eternit, Inc./
 American Biltrite, Inc./Dean's Material, Inc. d/b/a Construction Material Suppliers, Inc./Hayward Lumber Co./
 Kaiser Steel Resources/Champion Industrial Contractors/Singer Safety Co./Powerline Oil Co./
 Robertshaw Controls Co./Seal Methods, Inc./Pillar Industries, Inc./Del Webb Corporation
 Prusik, Selby, Daley & Swan, 303 W. Madison St., Suite 1600, Chicago, IL 60606 312/553-4700
 On behalf of: Wheeler Protective Apparel Fax: 312/553-0332
 Raifman & Edwards, 131 Steuart Street, Fourth Floor, San Francisco, CA 94105-1230 415/284-6700
 Attn: Jon Logan Edwards Fax: 415/284-6701
 On behalf of: American Crane & Equipment Corporation
 Rankin, Sproat & Pollack, 1800 Harrison St., Suite 1616, Oakland, 94612, Mailing: 510/465-3922
 P.O. Box 28765, Oakland, CA 94604, Attn: Thomas A. Trapani Fax: 510/465-3006
 On behalf of: Peninsula Hospital/California Pacific Medical Center/Ralph K. Davies Medical Center/
 St. Mary's Hospital/St. Luke's Hospital/John Muir Hospital/Summit Medical Center/Alta Bates Hospital/
 Mt. Zion Hospital/St. Francis Hospital/Sutter Health Pacific/Sutter Memorial Hospital/Sutter General Hospital/
 Reisinger & McAuley, 1050 Northgate Dr., Suite One, San Rafael, CA 94903 415/499-1033
 Attn: Jerry L. Williams Fax: 415/499-0329
 On behalf of: San Pablo Plumbing Co./Noble Auto Parts/J.G. MacPhee Co.
 Rice, Fowler, Booth & Banning, 275 Battery Street, 27th Floor, San Francisco, 415/399-9191
 CA 94111, Attn: M. Felicia Gay Fax: 415/399-9192
 On behalf of: Mobil Oil Corporation/Dorr-Oliver, Inc./Matthew G. Norton Co.
 Rivkin, Radler & Kremer, Post Office Box 14609, Santa Rosa, CA 95402 707/576-8033
 Attn: Christopher A. Crevasse Fax: 707/576-7955
 On behalf of: Kimberly-Clark Corp./D.A.R. Industrial Products, Inc.
 Ropers, Majeski, Kohn & Bentley, 670 Howard Street, San Francisco, CA 94105 415/543-4800
 Attn: John Curran Ladd Fax: 415/512-1574
 On behalf of: The Cannery/Cyprus Amax Minerals Co./Calfox, Inc./General American Transportation Corp./
 Porter Warner Industries, Inc./E.V. Roberts & Associates, Inc./The Bank of California/Grinnell Corp./
 Embarcadero Center Associates/Westinghouse Electric Corp./Rome Cable Corp./Dinwiddie Construction/
 Genuine Parts Co./Glas-Col Apparatus Co./Oakhill Improvement Co./Oahu Sugar Co./Lucky Stores/Prudential
 Insurance Company of America/California Safety & Supply
 Mark H. Rosenthal, Esq., 300 California St., 30th Floor, San Francisco, CA 94111 415/986-1364
 On behalf of: Crown Cork & Seal 425 California St., Ste 2506 Fax: 415/362-1915
 2961984

Rust, Armenis, Schwartz, Lamb & Bills, Post Office Box 41958, Sacramento, CA 95841, Attn: Duane Skelton	816/972-8300 Fax: 916/972-7878
On behalf of: Melrose Lumber Supply/Tynan Lumber Co., Inc./Minton's Lumber & Supply S&P Company, 100 Shoreline Highway, Building B, Suite 315, Mill Valley, CA 94941	415/332-0550 Fax: 415/332-9023
Attn: William M. Bittling	
On behalf of: General Brewing Co./Lucky Lager Brewing Co.	
St. Clair, McFetridge & Griffin, One Montgomery St., Suite 1400, San Francisco, CA 94104, Attn: Anthony Griffin	415/421-2462 Fax: 415/421-2462
On behalf of: Bank of America NT & SA	
St. Peter & Cooper, Three Embarcadero Center, Suite 2900, San Francisco, CA 94111	415/955-0700 Fax: 415/955-0711
Attn: Michael St. Peter	
On behalf of: ACandS, Inc.	
Sack and Associates, 1433 Webster Street, Suite 200, Oakland, CA 94612	510/444-6453 Fax: 510/444-3753
Attn: William S. Miller	
On behalf of: Ralph M. Parsons Co./Chicago Bridge & Iron Co.	
Sainick & Cote', 190 Newport Center Drive, Suite 100, Newport Beach, CA 92660	714/644-9400 Fax: 714/644-1142
Attn: Frederick B. Sainick	
On behalf of: San Joaquin Refining	
Samaha, Grogin, Stulberg, 35 North Lake Avenue, Suite 810, Pasadena, CA 91101-1856, Attn: Thomas J. Samaha	818/584-1388 Fax: 818/584-6664
On behalf of: Hood Corporation	
Sarrail, Lynch & Hall, 44 Montgomery Street, 34th Floor, San Francisco, CA 94104	415/398-2404 Fax: 415/391-9076
Attn: Brian D. Harrison	
On behalf of: Safeway, Inc.	
Scadden, Hamilton & Ryan, 580 California St., Suite 1400, San Francisco, CA 94104	415/362-5116 Fax: 415/364-4214
Attn: Greg Mitchell	
On behalf of: Supro, Inc./Trans-European Motors/Elliott Co./Excelsior, Inc./Bank of California/ Dover Resources/EG&G Sealol, Inc./Alfred Conhagen, Inc./Foster Wheeler Corp./Riley Stoker Corp./ Liberty Mutual Insurance Co./Valley Nitrogen Producers/Greene Tweed Co./Southern California Jobbers/ National Auto Parts/H.J. Heinz Corp./Nestle Food Co./Durametall Corp./Colgate-Palmolive/ United Technologies Corp./Robertson-Ceco Corp./Clayton Industries	
Schaffer & Lax, 5757 Wilshire Blvd., Suite 600, Los Angeles, CA 90036	213/934-4300 Fax: 213/931-5680
Attn: Kevin J. McNaughton	
On behalf of: U.S. Mineral Products Co.	
Schofield & Schiller, 100 Pringle Ave., Suite 510, Walnut Creek, CA 94596	510/934-3600 510-934-2257
Attn: Carol Meyer	
On behalf of: Kelly-Moore Paint Co./Regents of the University of California/Airport Auto Parts, Inc./Farmers Underwriters Association/Peck Jones Construction Co./C.L. Peck Contractor	
Schuler & Kessel, 3435 Wilshire Boulevard, Suite 1970, Los Angeles, CA 90010-1901	213/365-0924 Fax: 213/365-0938
Attn: Elizabeth M. Kessel	
On behalf of: Aluma Systems	
Schwabe, Williamson & Wyatt, 1211 SW Fifth Ave., Suites 1600-1950, Portland, OR 97204-3795, Attn: Margaret Hoffman	503/222-9981 Fax: 501/796-2900
On behalf of: Oregon Steel Mills	
Sedgwick, Detert, Moran & Arnold, One Embarcadero Center, 16th Floor, San Francisco, CA 94111, Attn: Holly A. Harris	415/781-7900 Fax: 415/781-2635
On behalf of: Scandura, Inc./Hennessy Industries, Inc./Ingalls Shipbuilding/Standard Oil of California/ Shell Oil Co./Soco-Lynch Corp./General Electric Co./Phillips Petroleum Co./Pacific Gas & Electric Co./ Chevron, U.S.A., Inc./Glass Containers Corp./Consolidated Insulation/Hawaiian Electric/Sierra Pacific/ CPC International/Gulf Oil	
Sedgwick, Detert, Moran & Arnold, 801 South Figueroa Street, 18th Floor, Los Angeles, CA 90017-5556, Attn: John R. Burge	213/426-6900 Fax: 213/426-6921
On behalf of: Caterpillar, Inc.	
Seyfarth, Shaw, Fairweather & Geraldson, 101 California Street, Suite 2900, San Francisco, CA 94111, Attn: Peter E. Romo	415/397-2823 Fax: 415/397-8549
On behalf of: Marriott Corp./Newport News Shipbuilding & Dry Dock Co./Bay Decking Co., Inc.	

Daniel M. Shapiro, Attorney at Law, 333 South Grand Ave., Suite 2850, Los Angeles, CA 90071	213/625-7400 Fax: 213/625-0303
On behalf of: Calmar Distributing Co., Inc.	
Shea & Gardner, 1800 Massachusetts Avenue N.W., Washington, D.C. 20036	202/828-2000
Attn: Laura Quinn	Fax: 202/828-2195
On behalf of: Rockwell International	
Sheppard, Mullin, Richter & Hampton, Four Embarcadero Center, 17th Floor, San Francisco, CA 94111, Attn: Gary J. Nevolo	415/434-4914 Fax: 415/434-3947
On behalf of: American Optical Co.	
Sheppard, Mullin, Richter & Hampton, Four Embarcadero Center, 17th Floor, San Francisco, CA 94111, Attn: John F. Runkel, Jr.	415/434-4914 Fax: 415/434-3947
On behalf of: American National Can Co.	
Sidley & Austin, 555 West Fifth Street, Los Angeles, CA 90013-1010	213/896-6000
Attn: Alan Au	Fax: 213/896-6600
On behalf of: Midwest Power Systems	
Sinclair & Hill, Post Office Box 992710, Redding, CA 96099-2710	916/226-9700
Attn: Craig A. Sinclair (100 e. Cypress Ave., Suite 200)	Fax: 916/226-9481
On behalf of: Mercy Medical Center/Mercy Hospital of Redding	
Skeel, Henke, Evenson & Roberts, 900 Fourth Avenue, Suite 3801, Seattle, WA 98164, Attn: Eric Richter	206/623-1031 Fax: 206/628-2033
On behalf of: Olympic Steamship Co.	
Sorem & Pastore, 2565 Camino del Rio South, Suite 101, San Diego, CA 92108	619/574-1545
Attn: Joseph A. Pastore	Fax: 619/574-1200
On behalf of: Fryer-Knowles, Inc.	
Southern Pacific Transportation Co. Law Department, 10860 Gold Center Dr., Suite 410, Rancho Cordova, CA 95670, Attn: Michael L. Johnson	916/789-5824 Fax: 916/789-5827
Stark, Wells, Rahl, Schwartz & Schieffer, 1999 Harrison Street, Suite 1300, Oakland, CA 94612, Attn: May Lee Tong	510/834-2200 Fax: 510/763-5121
On behalf of: Cassiar Mining Corp.	
Steele & Sales, P.C., 700 5th Avenue, Suite 5511, Seattle, WA 98104	206/682-2202
Attn: Katherine M. Steele	Fax: 206/682-1224
On behalf of: E.J. Bartells Co.	
Steefel, Levitt & Weiss, One Embarcadero Center, Suite 2900, San Francisco, CA 94111, Attn: Barry W. Lee	415/788-0900 Fax: 415/788-2019
On behalf of: Cal-Steam/Westburne Supply, Inc./Moran Supply/Plumbers Supply	
Sterling & Clack, 101 Howard Street, Suite 400, San Francisco, CA 94105	415/543-5300
Attn: Rex M. Clack	Fax: 415/543-3335
On behalf of: Olympic Steamship Co./Pope & Talbot, Inc.	
Stevens, Drummond & Gifford, 1910 Olympic Boulevard, Suite 250, Walnut Creek, CA 94596, Attn: David A. Gifford	510/944-5550 Fax: 510/256-9669
On behalf of: North American Refractories Co./Aetna Rubber & Supply/Asbestos Corporation, Ltd./	
Wagner Electric Corp./Bell Asbestos/Azrock Industries/Cooper Industries, Inc.	
Francis J. Stillman, Attorney at Law, 1601 Bayshore Highway, Suite 301, Burlingame, CA 94010	415/692-7492 Fax: 415/692-9144
On behalf of: Montgomery, Ward & Co.	
Stumbos & Mason, 2151 River Plaza Dr., Suite 100, Sacramento, CA 95833	916/567-8211
Mailing: P.O. Box 868, Sacramento, CA 95804, Attn: Brad Thomas	Fax: 916/567-8212
On behalf of: Fruehauf Corp./Kelsey-Hayes Co.	
Sturgeon, Keller, Phillips & Gee, 388 Market Street, Suite 670, San Francisco, CA 94111, Attn: Brock D. Phillips	415/955-0800 Fax: 415/955-0810
On behalf of: Atchison, Topeka & Santa Fe Railway Co./Burlington Northern Railroad Co.	
Tarkington, O'Connor & O'Neill, One Market Plaza, Spear Street Tower, 41st Floor, San Francisco, CA 94105, Attn: Deborah Lindblom	415/777-5501 Fax: 415/546-4962
On behalf of: Western Brake/Friction, Inc./Imperial Holly Corp. (Holly Sugar)	
Thayer, Harvey, Hodder & Gregerson, 1100 Fourteenth Street, Suite F, Modesto, CA 95353 (Mail: P.O. Box 3465, Modesto, CA 95353), Attn: Janet B. Hodder	209/523-3300 Fax: 209/523-3399
On behalf of: Roseville Telephone Company	

Thelen, Marrin, Johnson & Bridges, Two Embarcadero Center, San Francisco, CA 94111, Attn: Jennifer A. Kuenster 415/392-6320
 On behalf of: Kaiser Aerotech/Kaiser Aluminum & Chemical Corp./Bechtel Corp./Sequoia Ventures, Inc./Robert E. McKee, Inc./Kaiser Center, Inc./Mack Trucks, Inc./Fremont Group, Inc. Fax: 415/421-1068

Thelen, Marrin, Johnson & Bridges, 333 South Grand Avenue, 34th Floor, Los Angeles, CA 90071, Attn: Paul Lax 213/621-9800
 On behalf of: M.W. Kellogg/Dresser Industries, Inc. Fax: 213/623-4742

Thompson & Heller, 400 Capitol Mall, 26th Floor, Sacramento, CA 95814 916/498-7300
 Attn: Phillip Bonotto Fax: 916/498-7350

On behalf of: Vellumoid, Inc./Hopeman Brothers/Great Lakes Carbon Corp./Ticor Title Insurance Co./Dravo Corporation/Federated Department Stores

Tilly & Graves, 500 Washington St., Suite 800, San Francisco, CA 94111 415/955-8925
 Attn: Patrick O'Keefe Fax: 415/955-8933

On behalf of: Owens-Corning Fiberglas Corp.

Time Oil Company, P.O. Box 2447, Seattle, WA 98124 206/285-2400
 Attn: Ron Kokesh Fax: 206/286-4488

TIMEC Company, 155 Corporate Place, Vallejo, CA 94590, Attn: Brent A. Babow 707/642-2222
 (The Industrial Maintenance Engineering Co.) Fax: 707/648-2719

Titchell, Maltzman, Mark, Bass, Ohleyer & Mishel, 650 California St., 29th Floor, San Francisco, CA 94108, Attn: Philip B. Bass/Richard C. Insalaco 415/392-5600
 On behalf of: American Brass & Iron Foundry Fax: 415/981-5027

Vogl & Meredith, 456 Montgomery St., 20th Floor, San Francisco, CA 94104 415/398-0200
 Attn: Jean Yeh Fax: 415/398-2820

On behalf of: American Asbestos Co./Pacific Pipe/ San Mateo Lumber Co./Avocet Enterprises, Inc./Pacific Supply Co./W.E. Mushet Co.

Walsworth, Franklin, Bevins & McCall, 580 California Street, Suite 1335, San Francisco, CA 94104, Attn: Robert M. Channel 415/781-7072
 On behalf of: Bishop Wholesale, Inc./Friction Materials, Inc./California Builders Hardware/Dowman Products/Pacific Holiday Towers, Ltd./Hamilton Materials/Selby, Battersby & Co./Daniel Smith Plastering, Inc./Western Water Works/Southern California Edison Co./Thomas Dee Engineering Co./Quintec Industries/Rite Engineering Manufacturing/Stanley Folb, Inc./K.R. Anderson/American Chemet Corp./Supreme Auto Parts/Saberhagen Holdings, Inc. (The Brower Co.)/Carter Co./San Diego Gas & Electric/Bondex International/Custom Building Products/Martin Madsen Co./Baltimore Ennis Land Co./MacAulay Foundry, Inc./W.W. Henry Co. Fax: 415/391-6258

Walsworth, Franklin, Bevins & McCall, 1 City Boulevard West, Suite 308, Orange, CA 92668-3604, Attn: Michael T. McCall 714/634-2522
 On behalf of: Gibson-Homans Fax: 714/634-0686

White, Gorman & Baker, One Market Plaza, Spear Street Tower, 8th Floor, San Francisco, CA 94105, Attn: Margaret T. Gorman 415/541-3720
 On behalf of: 870 Market Street Associates/Anchor Brewing Co./Diana Fruit Co./American Energy Products/Hales & Symons/Haskell Corp./Big B Lumberteria/Lindsay International, Inc./Structural Coating, Inc./Elliott Glove Co./George P. Reintjes Co., Inc. Fax: 415/541-3738

Williams, Romanski, Polverari & Skelton, 152 North Third St., Suite 600, San Jose, CA 95112, Attn: Alan J. Zapala 408/275-8262
 On behalf of: Epoxylite Corp./Bay Rubber Co./Yrueta Drywall & Painting/Basco Drywall & Painting Co./Allied Packing & Supply Fax: 408/294-6707

Wilson, Elser, Moskowitz, Edelman & Dicker, 650 California Street, 14th Floor, San Francisco, CA 94108, Attn: Colleen A. Peck 415/433-0990
 On behalf of: Kubota Corp./Durabla Mfg. Co., Inc./Asbestos Products Mfg. Corp./H&A Construction Corp./Asbestospray Fax: 415/434-1370

Law Offices of Robert K. Wright, 301 N. Lake Ave., Suite 700, Pasadena, CA 91101 818/796-2664
 On behalf of: The Budd Company Fax: 818/796-1601

Wright, Robinson, McCammon, Osthimer & Tatum, 44 Montgomery St., 18th Floor, San Francisco, CA 94104, Attn: Mark P. Krinsky 415/391-7111
 On behalf of: San Francisco Gravel Co./J.S. Guerin Co. Fax: 415/391-8766

Wright, Robinson, McCammon, Osthimer & Tatum, 44 Montgomery St., 18th Floor, San Francisco, CA 94104, Attn: Myles E. Fladager 415/391-7111
 On behalf of: Freightliner Corp. Fax: 415/391-8766