

NO. 81-G-13314

BARBARA MEYER	§	IN THE DISTRICT COURT OF
	§	
VS.	§	BRAZORIA COUNTY, TEXAS
	§	
JOHNS-MANVILLE SALES	§	
CORPORATION, ET AL	§	239TH JUDICIAL DISTRICT

**DEFENDANT DOW CHEMICAL COMPANY'S
ANSWERS TO INTERROGATORIES**

TO: DEFENDANT, KAISER GYPSUM COMPANY, INC., by and through their attorney of record, LARRY D. KNIPPA, Heath & Knippa, 2800 Texas Commerce Tower, Houston, Texas 77002.

COMES NOW Defendant, THE DOW CHEMICAL COMPANY, in the above entitled and numbered cause, and files these its Answers to Interrogatories received by its attorney of record, subject to the right to make all legal objections to these interrogatories and answers at the time of trial. The answers to these interrogatories follow.

Respectfully submitted,

ANDREWS & KURTH

By: Andrew S. Hanen
 ANDREW S. HANEN - #08905800
 4200 Texas Commerce Tower
 Houston, Texas 77002
 (713) 220-4148

ATTORNEYS FOR DEFENDANT
 THE DOW CHEMICAL COMPANY

ST0009974

CERTIFICATE OF SERVICE

I, ANDREW S. HANEN, certify that a true and correct copy of the following Answers to Interrogatories by defendant, THE DOW CHEMICAL COMPANY, have been mailed by certified mail, return receipt requested, to counsel of record for Kaiser Gypsum Company, Inc., and a copy of the answers have been mailed to all other attorneys of record on this the 31st day of August, 1983.

Andrew S. Hanen
 ANDREW S. HANEN

WRITTEN INTERROGATORIES

1. Did Dow Chemical Company, from January 1, 1940, through December 31, 1965, have on its premises in Freeport, Texas, any product manufactured or sold by Kaiser Gypsum Company, Inc.?

Unknown

2. If the answer to interrogatory number one (1) is in the affirmative, please:

(a) Specifically identify the product:

N/A

(b) The date it was purchased:

N/A

(c) State verbatim all information printed on any identification tag on the product:

N/A

(d) State any identifying serial numbers on the product:

N/A

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- (e) The exact location where such product is located on your premises in Freeport, Texas:

N/A

- (f) State verbatim the contents of any documents, notes, memoranda, specifications, purchase orders, bills, receipts and records pertaining to the purchase by Dow Chemical Company of any product sold or manufactured by Kaiser Gypsum Company, Inc, between January 1, 1940, and December 31, 1966.

N/A

- (g) In lieu of answering subparagraph (f) of Interrogatory number two (2) please attach true and correct and legible copies of all such documents, notes, memoranda, specifications, purchase orders, bills, receipts and records referred to in subparagraph (f) to your answers to these interrogatories.

N/A

3. Please state the name and address of the person answering these interrogatories.

Edward A. Aldous, Jr., Senior Attorney
The Dow Chemical Company
Freeport, Texas 77541

4. Please specifically identify all sources of information referred to in answering these interrogatories.

N/A

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5. List the names and addresses of all witnesses who have knowledge of the facts:

(a) Of the purchase or acquisition of Kaiser Gypsum products by Dow Chemical Company:

Unknown

(b) The location thereof in the Freeport premises;

Unknown

(c) The contact of Plaintiff Meyer with such products.

Unknown

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