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Attorneys for Defendant
SEQUOIA VENTURES INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO

IN RE:

COMPLEX ASBESTOS LITIGATION

NO. 828684

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

INTERROGATORY NO. 9:

IDENTIFY YOUR custodian of Business Records.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9:

Defendant does not have a custodian of business records. Counsel for Defendant has directed the retrieval and organization, and currently maintains in its custody, certain documents pertinent to the asbestos litigation. No employee of Defendant is the custodian of these records. Requests for these records can be made to counsel for Defendant. Janice Nakamura is the custodian of incorporation and like corporate formality documents.

1 INTERROGATORY NO. 10:

2 IDENTIFY the person or persons most knowledgeable about:

3 A. YOUR acquisition of RAW ASBESTOS and/or
4 ASBESTOS CONTAINING PRODUCTS;

5 B. YOUR use of RAW ASBESTOS and/or ASBESTOS
6 CONTAINING PRODUCTS;

7 C. YOUR contracting with others to do work
8 involving use or handling of RAW ASBESTOS or ASBESTOS
9 CONTAINING PRODUCTS.

10 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10:

11 Defendant has conducted a reasonable search and
12 diligent inquiry and determined that there is no current or
13 former employee with personal knowledge regarding Defendant's
14 use, acquisition or contracting with others to do work
15 involving the use or handling of asbestos-containing products.
16 Defendant performed several hundred construction projects in
17 the Geographic Area during the relevant time period. All of
18 Defendant's insulation work was handled on a project-by-
19 project basis. There is no current or former employee who is
20 generally knowledgeable about the issues listed in this
21 interrogatory.

22 INTERROGATORY NO. 13:

23 For each of the following, please state whether, at any
24 time within the time frame or until such time as any defendant
25 which had been engaged in MARKETING RAW ASBESTOS or ASBESTOS-
26 CONTAINING PRODUCTS discontinued the MARKETING of such
27 products, THIS DEFENDANT was a member or paid dues for any

1 representative of THIS DEFENDANT (excluding faculty members of
2 educational institutions) to be a member of the following:

3 A. American Conference of Governmental Industrial
4 Hygienists;

5 B. American Industrial Hygiene Association;

6 C. American Petroleum Institute;

7 D. American Railroad Association;

8 E. Asbestos Cement Producers Association;

9 F. Asbestos Information Association (AIA) (please
10 answer through date of your answers);

11 G. Asbestos Information Association/North America
12 (AIA/NA) (please answer through date of your answers);

13 H. Asbestos Textile Institute (ATI);

14 I. Industrial Hygiene Foundation and/or Industrial
15 Health Foundation (IHF);

16 J. Industrial Mineral Insulation Manufacturers
17 Institute;

18 K. Magnesia Insulation Manufacturers' Association;

19 L. Magnesia Silica Insulation Manufacturers
20 Association;

21 M. Mineral Wool Institute;

22 N. National Insulation Manufacturers Association
23 (NIMA);

24 O. National Safety Council;

25 P. New York Academy of Sciences;

26 Q. Quebec Asbestos Mining Association (QAMA);

27 R. Refractories Institute;

1 S. Safe Building Alliance (please answer through
2 date of your answers);

3 T. Thermal Insulation Manufacturers Association
4 (TIMA);

5 U. U.S. Maritime Commission;

6 V. IDENTIFY any other organizations, associations
7 or groups of manufacturers, miners, distributors, importers,
8 labelers, suppliers, and/or sellers of ASBESTOS-CONTAINING
9 PRODUCTS of which THIS DEFENDANT was a member;

10 W. IDENTIFY any such representative of THIS
11 DEFENDANT.

12 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13:

13 W. Unknown. Defendant has conducted reasonable
14 search and diligent inquiry and is unable to locate any
15 information regarding this interrogatory sub-part.

16 INTERROGATORY NO. 18:

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

23 A. The date each such library was established;

24 B. The location of each such library;

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

27 ///

1 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 18:

2 Defendant maintains the following libraries today:

3 <u>Location</u>	<u>Date Established</u>	<u>Librarian</u>
4 San Francisco	1951	J. Mah
5 Gaithersburg	1973-74	E. Ponomarenko
6 Houston	1973	C. Bobrycki

7
8 Defendant has determined that in 1981 the following
9 additional libraries existed, but they no longer exist.

10 Defendant does not have information regarding the date each
11 was established.

12 <u>Location</u>	<u>Date Established</u>	<u>Librarian</u>
13 Ann Arbor, MI	Unknown	J. Adams
14 Los Angeles, CA	Unknown	J. Gregory B. Larson

15 Each of the libraries that exists today contains
16 books and/or other publications that relate to the subject of
17 asbestos, industrial hygiene, medicine, safety, and/or
18 occupational disease. For both the libraries which exist
19 today and those which existed in the past, the identity of the
20 books and publications in the collection at any particular
21 point in time is unknown to defendant.

22 INTERROGATORY NO. 22:

23 Has THIS DEFENDANT (except for a defendant that is an
24 educational institution) conducted, or caused to be conducted,
25 any tests and/or studies on ambient asbestos dust levels at
26 any location or job site where ASBESTOS-CONTAINING PRODUCTS
27 were installed, utilized or removed? If so, for the first 5

1 tests and/or studies, state:

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

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

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

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

10 E. The IDENTITY of the custodian of such
11 DOCUMENTS.

12 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 22:

13 Yes. Defendant is unable to determine the first
14 five studies. Defendant has performed a reasonable search and
15 diligent inquiry and is unable to locate records that would
16 identify the first five studies.

17 INTERROGATORY NO. 33 (CONTRACTOR DEFENDANTS only)

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

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

21 B. If on the date of your answers YOU are a defendant
22 in four or more asbestos actions in San Francisco Superior Court,
23 IDENTIFY each job or contract that YOU performed (directly or
24 through one or more subcontractors) during this time period for
25 work in any PREMISES which is at issue as to YOU on such date, and
26 in any PREMISES of 50,000 square feet or more in the GEOGRAPHIC
27 AREA which job or contract involved installation, removal,

1 disturbing or handling RAW ASBESTOS or ASBESTOS-CONTAINING
2 PRODUCTS. (Alternatively, at your option, you may IDENTIFY each
3 job or contract YOU performed (directly or through one or more
4 subcontractors) during this time frame for all work, or for all
5 work on PREMISES of 50,000 square feet or more, in the GEOGRAPHIC
6 AREA.) As to each such job or contract:

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

9 2. State the date of the contract or the
10 inclusive dates of the work;

11 3. IDENTIFY the person or entity with whom you
12 contracted;

13 4. State your job or contract number.

14 C. If on the date of your answers you are not a
15 defendant in four or more asbestos actions in San Francisco
16 Superior Court, IDENTIFY each job or contract that YOU performed
17 (directly or through one or more subcontractors) during this time
18 period for work in any PREMISES which is at issue as to YOU on
19 such date. As to each such job or contract:

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

22 2. State the date of the contract or the
23 inclusive dates of the work;

24 3. IDENTIFY the person or entity with whom you
25 contracted;

26 4. State your job or contract number.

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SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 33:

Location	Client	Job # Opened	Job # Closed	Job #	Job Description
EUREKA, CA	PACIFIC GAS&ELEC	4509	4511	1001	GAS MAINS
RICHMOND, CA	STANDARD OIL OF CALIF	4510	4601	1027	FUEL LINES
RICHMOND, CA	STANDARD OIL OF CALIF	4511	4903	1030	CRUDE UNIT & POLYMER PLT CONVERT
PITTSBURG, CA	DOW CHEMICAL CO	4511	4601	1031	SEWERS
AVON, CA	TIDEWATER	4602	4711	1034	CRUDE UNIT
RICHMOND, CA	STANDARD OIL OF CALIF	4511	4601	1041	WATER LINE
LOS ANGELES, CA	UNOCAL	4512	4602	1042	PIPELINE
RICHMOND, CA	STANDARD OIL OF CALIF	4601	4609	1056	LOADING RACKS
SAN FRANCISCO, CA	PACIFIC GAS&ELEC	4602	4701	1098	GAS MAINS
MARTINEZ, CA	SHELL CHEMICAL	4702	4707	1152	METHYL ISOBUTYL KETONE UNIT
RICHMOND, CA	STANDARD OIL OF CALIF	4604	4607	1158	DISMANTLE EQUIPMENT
RICHMOND, CA	STANDARD OIL OF CALIF	4605	4608	1177	SULFONATE-A DETERGENT PLANT
AVON, CA	TIDEWATER	4610	4704	1186	COMPRESSOR INSTALL & FOUNDATIONS
RICHMOND, CA	STANDARD OIL OF CALIF	4608	4610	1197	SEWERS
RICHMOND, CA	STANDARD OIL OF CALIF	4610	4803	1239	SULFONATE-A DRYING&HANDL.FACIL.
RICHMOND, CA	STANDARD OIL OF CALIF	4610	4702	1253	RESEARCH FACIL UTILITIES
RICHMOND, CA	STANDARD OIL OF CALIF	4612	4612	1264	DISMANTLE TANK CAR TRACKS
SAN FRANCISCO, CA	SHELL CHEMICAL	4701	4710	1298	AMMONIUM SULFATE PLANT
MARTINEZ, CA	SHELL CHEMICAL	4701	4711	1303	MISC CONSTRUCT WORK AS REQD
RICHMOND, CA	STANDARD OIL OF CALIF	4703	4709	1321	PIPING & DRAINS
MARTINEZ, CA	SHELL OIL CO.	4709	4803	1329	MOTOR LAB
HERCULES, CA	HERCULES POWDER	4709	4710	1353	INSTALL DIESEL GENERATOR
RICHMOND, CA	STANDARD OIL OF CALIF	4803	4903	1408	INSTALL MISC OFF-PLOT- GREASE PLT
ANTIOCH, CA	PACIFIC GAS&ELEC	4809	5312	1430	CONTRA COSTA 1,2&3-OIL- 3X 110MW
RICHMOND, CA	STANDARD OIL OF CALIF	4807	4902	1437	RAILROAD TRACK INSTALL.

1	RICHMOND, CA	STANDARD OIL OF CALIF	4902	4910	1514	LIQUID PETROLEUM GAS FACIL.
2	RICHMOND, CA	STANDARD OIL OF CALIF	4511	4906	1555	RICHMOND REF.MAINTENANCE WORK
3	RICHMOND, CA	STANDARD OIL OF CALIF	4910	5003	1591	HI-PRESSURE FIRE LINES
4	HERCULES, CA	HERCULES POWDER	4911	4912	1608	FOUNDATIONS
5	RICHMOND, CA	STANDARD OIL OF CALIF	5006	5204	1657	CONVERT TCC TO HOUDRIFLOW
6	SAN FRANCISCO, CA	PACIFIC ELECTRIC	5005	5105	1658	BUILDINGS
7	AVON, CA	TIDEWATER	5008	5009	1692	INSTALL COMPRESSOR
8	ANTIOCH, CA.	PACIFIC GAS&ELEC	5103	5310	1729	CONTRA COSTA 4&5-OIL- 2X 115MW
9	RICHMOND, CA	STANDARD OIL OF CALIF	5101	5101	1750	SHEET METAL WALL
10	MARTINEZ, CA	SHELL CHEMICAL	5103	5109	1759	OCTYL FORMAL & MIBK PLANTS
11	MARTINEZ, CA	SHELL CHEMICAL	5104	5111	1801	OCTYL FORMOL PLANT
12	AVON, CA	TIDEWATER	5106	5107	1822	REPAIR BLDG
13	EMERYVILLE, CA	SHELL DEV PROPTY	5112	5205	1846	PILOT PLANT
14	PITTSBURG, CA	PACIFIC GAS&ELEC	5109	5412	1852	PITTSBURG 1,2,3&4-OIL- 4X 159MW
15	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5110	1862	DISMANTLE TANK
16	MARTINEZ, CA	SHELL CHEMICAL	5202	5209	1864	PLANT EXPANSION
17	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5207	1869	ALKANE PLANT MODIFIC.
18	RICHMOND, CA	STANDARD OIL OF CALIF	5110	5206	1874	LUBE OIL ACID TREAT
19	RICHMOND, CA	STANDARD OIL OF CALIF	5112	5204	1876	PIPING
20	MARTINEZ, CA	SHELL CHEMICAL	5205	5210	1888	PLANT EXPANSION
21	ANTIOCH, CA.	PACIFIC GAS&ELEC	5301	5312	1914	EXTRA WORK ANTIOCH PWR PLT
22	AVON, CA	TIDEWATER	5205	5306	1928	DE-ETHANIZER UNIT
23	RICHMOND, CA	STANDARD OIL OF CALIF	5205	5208	1945	MISC MAINTENANCE
24	RICHMOND, CA	STANDARD OIL OF CALIF	5207	5305	2002	MODIFY DISTILL SECTION-CRUDE UN.
25	AVON, CA	TIDEWATER	5306	5307	2023	TRAY INSTALL IN DEPROPANIZER
26	HERCULES, CA	HERCULES POWDER	5303	5311	2034	60 TON/DAY ADD TO AMMONIA PLT
27	MORRO BAY, CA	PACIFIC GAS&ELEC	5301	5603	2050	MORRO BAY 1&2-OIL- 2X 158MW
	OLEUM/RODEO, CA	UNOCAL	5311	5504	2075	UTILITIES&TANKS&YRD PIPE&ELECT
	OLEUM/RODEO, CA	UNOCAL	5402	5411	2104	GREASE PLANT MODIF.
	AVON, CA	TIDEWATER	5312	5409	2133	MARINE TERMINAL-OIL-FACILITY

1	LOS ANGELES, CA	UNOCAL	5402	5405	2138	GAS TRUCK LOADING FACIL.
	RICHMOND, CA	STANDARD OIL OF CALIF	5404	5504	2160	PLATFORMER
2	BUHNE PT, 3 MI SOUTH OF EUREKA, CA	PACIFIC GAS&ELEC	5405	5612	2200	HUMBOLDT BAY UN 1-OIL-54MW
3	PITTSBURG, CA	DOW CHEMICAL CO	5505	5601	2208	PITTSBURG PLANT CAUSTIC IMPRVMTS
4	AVON, CA	TIDEWATER	5408	5411	2223	TRAY INSTALL DEBUTAN.TOWER
5	AVON, CA	TIDEWATER	5412	5611	2285	AVON REFINERY ADDITIONS
6	LOS ANGELES, CA	UNOCAL	5502	5602	2288	LUBE OIL TERMINAL FACILITIES
7	MOSS LANDING/ CONTR COSTA COUNTY	PACIFIC GAS&ELEC	5509	5611	2295	REHEAT & CROSSOVER CONNECTIONS
8	PITTSBURG, CA	PACIFIC GAS&ELEC	5501	5506	2303	PITTSBURG PLT MAINTENANCE PLANT
9	RICHMOND, CA	STANDARD OIL OF CALIF	5503	5604	2331	ALKANE PLANT MODIFICATIONS
10	RICHMOND, CA	STANDARD OIL OF CALIF	5504	5604	2352	REFORMER MODIFICATIONS
11	AVON, CA	TIDEWATER	5601	5603	2446	FLUID CAT CRACKER SHUTDOWN
12	PITTSBURG, CA	DOW CHEMICAL CO	5603	5706	2503	CHEMICAL PLANT ADDITIONS
13	AVON, CA	TIDEWATER	5604	5809	2515	AVON REFINERY ADDITIONS
14	LONG BEACH/ALAMITOS (NEAR), CA	ATLANTIC RICHFIELD	5604	5609	2526	FIREWALL ALAMITOS STM STA.
15	RICHMOND, CA	STANDARD OIL OF CALIF	5702	5709	2531	INCREASE CRUDE CAPACITY
16	BUHNE PT, 3 MI SOUTH OF EUREKA, CA	PACIFIC GAS&ELEC	5612	5809	2535	HUMBOLDT BAY 2 STEAM STATION
17	RICHMOND, CA	STANDARD OIL OF CALIF	5705	5806	2685	PLATFORMER
18	RICHMOND, CA	STANDARD OIL OF CALIF	5706	5803	2829	REBUILDING ISOPHTHALIC H2S UNIT
19	MORRO BAY, CA	PACIFIC GAS&ELEC	5804	5809	2889	INSTAL GAS FIRING EQUIPMENT
20	BUHNE PT, 3 MI SOUTH OF EUREKA, CA	PACIFIC GAS&ELEC	5804	6201	2956	HUMBOLDT BAY 3-BWR-65MW
21	RICHMOND, CA	STANDARD OIL OF CALIF	5812	5907	3173	HYDROFINER PROJECT
22	CROCKETT, CA	C & H SUGAR	5904	5906	3207	CROCKETT BAG MFG FACILITIES
23	RICHMOND, CA	STANDARD OIL OF CALIF	5709	6001	3310	FCC POLYMER PLANT
24	HERCULES, CA	HERCULES POWDER	6005	6012	3438	METHANOL PLANT
25	RICHMOND, CA	STANDARD OIL OF CALIF	6004	6103	3508	PIPE SPOOL FABRICATION/HAWAII
26	AVON, CA	TIDEWATER	6104	6404	3700	ISOCRACKER PROGRAM
	MARTINEZ, CA	SHELL OIL CO.	6103	6109	3789	VACUUM FLASHER
27	RICHMOND, CA	STANDARD OIL OF CALIF	6102	6106	3792	PARAXYLENE PLANT

1	RICHMOND, CA	STANDARD OIL OF CALIF	6103	6107	3840	RICHMOND-ISOCRACK.CAT.MFG PLT
2	RICHMOND, CA	STANDARD OIL OF CALIF	6107	6107	3973	AROMATICS RECOVERY UNIT CONVER.
3	RICHMOND, CA	STANDARD OIL OF CALIF	6204	6210	4210	ISOCRACKER MODIFICATIONS
4	RICHMOND, CA	CHEVRON OIL/CHEM	6408	6512	5191	ALPHA-OLEFIN PLANT EXPAN
5	RICHMOND, CA	STANDARD OIL OF CALIF	6409	6604	5232	ISOMAX
6	SAN ONOFRE, CA	SAN DIEGO GAS&EL	6412	6604	5245	SWITCHYARD
7	HERCULES, CA	HERCULES POWDER	6410	6709	5301	200 TPSD AMMONIA PLANT
8	OLEUM/RODEO, CA	UNOCAL	6502	6512	5466	CATALYTIC REFORMER EXPANTION
9	SAN ONOFRE-VILLA PARK, CA	SO CALIF EDISON	6508	6601	5668	TRANSMISSION LINE TOWER FOOTINGS
10	RICHMOND, CA	CHEVRON OIL/CHEM	6601	6707	5845	B-3 PLANT
11	RICHMOND, CA	STANDARD OIL OF CALIF	6606	6611	6163	ISOMAX REPAIR JOB
12	RICHMOND, CA	CHEVRON OIL/CHEM	6705	6808	6603	ALPHA OLEPHIN PLANT ADDITIONS
13	PITTSBURG, CA	DOW CHEMICAL CO	6709	6710	6899	CHEMICAL PLANT
14	OLEUM/RODEO, CA	UNOCAL	6808	7202	7299	UNICRACKER & REFINERY EXPANSION
15	SAN ONOFRE-VILLA PARK, CA	SO CALIF EDISON	6911	7001	8445	REINFORCED CONCRETE TOWER FOOTNG
16	SAN ONOFRE, CA	SO CALIF EDISON	7008	7010	9008	RELOCATE SWITCHRACK SITE A
17	OLEUM/RODEO, CA	UNOCAL	7203	7305	10000	RODEO PLT MODIF.POLLUTN CONTROL
18	SAN ONOFRE 3 MI S OF SAN CLEMENTE, CA	SO CALIF EDISON	7210	8412	10079	SAN ONOFRE UN 2&3-PWR
19	RICHMOND, CA	STANDARD OIL OF CALIF	7305	7702	10640	LOW SULFUR FUEL OIL PROJ-MODERNZ
20	RODEO, CA	UNOCAL	7809	8012	13237	LUBE OIL REVAMP
21	RICHMOND, CA	CHEVRON USA	8005	8812	14216	RICHMOND LUBE OIL PROJECT
22	RICHMOND, CA	CHEVRON USA	8105	8309	14836	ISOMAX CONTROL CENTER BLDG
23	SAN FRANCISCO, CA	PACIFIC GAS&ELEC	8203	8603	15320	COMPLETION SERVICES AT DIABLO CANYON NUC
24	SAN ONOFRE, CA	SO CALIF EDISON	8211	9412	15692	SAN ONOFRE UNITS 2 & 3 CONSTRUCTION BACK
25	AVON TO PITTSBURGH CA	TOSCO CORP.	8212	8307	15773	8 MI-8 NATURAL GAS P/L

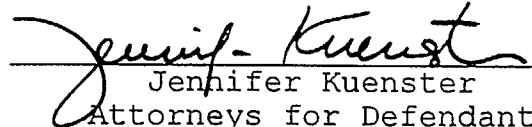
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AVILA BEACH, CA	PACIFIC GAS&ELEC	8203	8710	16293	DIABLO CANYON NUCLEAR PLANT, UNIT 1 & 2
CARSON, CA	ARCO PETR PRODUCTS	8402	8607	16494	FCCU POWER RECOVERY TRAIN
SAN ONOFRE, CA	SO CALIF EDISON	8404	9005	16859	SONGS 2/3 -CLOSE OUT

Dated: December 5, 1997 THELEN, MARRIN, JOHNSON & BRIDGES LLP

By


 Jennifer Kuenster
 Attorneys for Defendant
 Sequoia Ventures Inc.

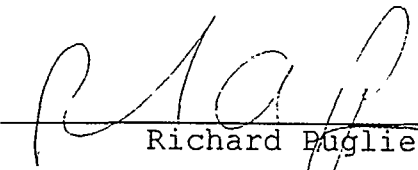
1
2 VERIFICATION
3

4 I, Richard Pugliese, state:

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

12 I certify under penalty of perjury under the laws of
13 the State of California that the foregoing is true and
14 correct.
15

16 Dated: '2 / 9 , 1997
17
18

19 
Richard Pugliese
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PROOF OF SERVICE

CASE: IN RE COMPLEX ASBESTOS LITIGATION
SAN FRANCISCO

SF: 828684

I, Jill Keene, am employed in the City and County of San Francisco, California, I am over the age of eighteen years and not a party to the within action; my business address is Two Embarcadero Center, Suite 2100, San Francisco, California 94111. On 10 DECEMBER 1997 I served the following document(s):

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

on the parties listed through their attorneys of record, by placing true copies thereof in sealed envelopes addressed and designated for service as listed below:

☒ By First Class Mail - Each such envelope, was prepared with first-class postage thereon fully prepaid, to be deposited in a recognized place of deposit of the U.S. Mail in San Francisco, California, for collection and mailing to the office of the addressee on the date shown herein following ordinary business practices.

ADDRESSEE:

BERRY & BERRY
1300 CLAY STREET, 9TH FLOOR
STATION D • PO BOX 70250
OAKLAND, CA 94612-0250

KAZAN, McCLAIN, EDISES, SIMON &
ABRAMS
171 12TH STREET, 3RD FLOOR
OAKLAND, CA 94612

WARTNICK, CHABER, HAROWITZ, et al.
101 CALIFORNIA STREET, 22nd FLOOR
SAN FRANCISCO, CA 94111

BRAYTON, HARLEY, CURTIS
222 RUSH LANDING RD, P.O. BOX 2109
NOVATO, CA 94948

HARRISON & DeGARMO
ONE DANIEL BURNHAM COURT
SUITE 220C
SAN FRANCISCO, CA 94109

LAW OFFICES OF BRUCE AHNFELDT
P.O. BOX 6238
NAPA, CA 94581

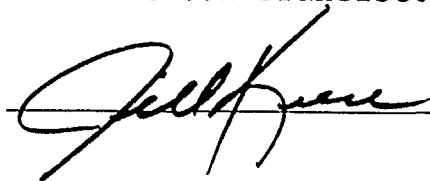
LAW OFFICES OF CHRISTOPHER GRELL
685 MARKET STREET, SUITE 540
THE MONADNOCK BUILDING
SAN FRANCISCO, CA 94105

LAW OFFICES OF JERRY NEIL PAUL
16830 VENTURA BLVD., SUITE 500
ENCINO, CA 91430

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LAW OFFICES OF JACK CLAPPER
2330 MARINSHIP WAY, SUITE 140
SAUSALITO, CA 94965

I declare under penalty of perjury that the foregoing is true
and correct. Executed 10 DECEMBER 1997 at San Francisco,
California.

A handwritten signature in black ink, appearing to read "Jack Clapper", written over a horizontal line.