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**PLAINTIFF'S
EXHIBIT**
SEQ-12

July 7, 1997

VIA FACSIMILE and REGULAR MAILDenise Abrams, Esq.
Kazan, McClain, Edises & Simon
171 Twelfth Street, 3rd Floor
Oakland, CA 94607Re: Mickelson: In Re Complex
Answers to Interrogatories

Dear Denise:

This letter is in response to yours of May 22, 1997 regarding the recently-served answers of Sequoia Ventures Inc. to the Alameda County In re Complex Interrogatories. I believe that we should be able to easily resolve most of the issues raised in your letter.

Interrogatory No. 1: Mr. Pugliese was hired as a senior paralegal and now holds the title of Senior Administrative Assistant.

Interrogatory No. 4: It is unclear to us what the phrase "qualified to do business" refers to. Please be advised that Bechtel Brothers McCone Corporation (now known as Sequoia Ventures Inc. and hereinafter referred to in this letter as SVI) was issued a contractor's license by the state of California in 1945.

Interrogatory No. 16: The only prefabrication site known to defendant is the one listed in response to Interrogatory No. 16. Pipes were assembled at that site.

Interrogatory No. 22: While you indicate in your letter that each of these interrogatories requires only a yes or no answer, we do not see how the interrogatory can be read in such a way for a contractor or premises defendant. SVI was not a manufacturer of asbestos-containing products. In an effort to be unambiguous in its responses to these interrogatories, SVI has indicated that it installed asbestos products manufactured by others.

EXHIBIT C

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Interrogatory No. 22 requests information about a defendant's marketing, delivery or advertisement of its "RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS". Bechtel did not have any such products. How can it possibly answer yes or no to a question that by its very terms is not applicable to a contractor defendant? Installation of products manufactured by others is not requested by this interrogatory. Such information is available on a case by case basis in response to a particular interrogatory. In fact, your office has propounded such discovery to SVI in several cases.

Interrogatory No. 23: This interrogatory is not susceptible to a yes or no answer. It is inapplicable to SVI for the reasons listed in reference to 22 above.

Interrogatory No. 24: Since this question asks regarding brochures describing a defendant's raw asbestos or asbestos-containing products, it cannot be answered by a non-manufacturer defendant with a yes or no response. To answer "no" would create the impression that the defendant did indeed have such products, which is not the case. Accordingly, the only non-ambiguous response a non-manufacturing defendant can make is that the interrogatory is inapplicable.

Interrogatory No. 26: Please tell me how this question, which asks for a description of packaging or containers, can be answered yes or no by any defendant. Again, because SVI did not sell or distribute raw asbestos fiber (see response to Interrogatory No. 13), the question is not applicable to it.

Interrogatory No. 27: Please tell me how this question, which, like the previous interrogatory, asks for a description of logos or markings on the packaging or containers of raw asbestos fibers, can be answered yes or no by any defendant. As in the prior questions in this series, this interrogatory cannot be answered by SVI with any information and is inapplicable to it because it never sold or distributed asbestos containing products.

Interrogatory No. 28: Please tell me how this question, which asks for a description of packaging or containers, can be answered yes or no by any defendant. Again, because SVI was not a manufacturer of asbestos containing products, the question is not applicable to it.

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Interrogatory No. 29. Please tell me how this question, which asks for a description of logos, designs, etc. on packaging or containers, can be answered yes or no by any defendant. Again, because SVI was not a manufacturer of asbestos containing products, the question is not applicable to it.

Interrogatory No. 30: Like Interrogatory No. 24, if a non-manufacturing defendant were to answer this question with a no, it would be a misleading and ambiguous answer.

Interrogatory No. 31: Defendant did not sell or distribute bags of raw asbestos fibers. How can it answer yes or no to this question? Like the prior answer, a "no" answer could mislead the reader into thinking that the defendant did sell or distribute bags of asbestos fibers.

Interrogatory No. 32: Again, this interrogatory can only be answered by a non-manufacturing defendant as "not applicable". A "no" answer would be misleading.

Interrogatory No. 33: Defendant has responded with all information available to it on this subject.

Interrogatory No. 34: Defendant has responded with all information available to it on this subject.

Interrogatory No. 35: Mr. Boley is no longer employed by SVI, and, in accordance with the definition of "IDENTIFY" in these interrogatories, SVI has provided his last known address. Mr. Kegebein's last known address is: 1244 South Mary, Sunnyvale, California.

Interrogatory No. 38: Defendant has supplied all information available to it about its membership in the NSC.

Interrogatory No. 40: Defendant is unable to determine what texts, periodicals, etc. were included in the libraries mentioned during the time period called for in the interrogatory. The libraries no longer exist.

Interrogatory No. 44: This interrogatory is not applicable to SVI because it refers to the defendant's asbestos-containing products. SVI did not manufacture such products, and therefore it cannot respond to this interrogatory. SVI has no information indicating whether or not any such tests or studies were done at

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the prefabrication site identified in Response to Interrogatory No. 16.

Interrogatory No. 51 and 52: SVI has not been able to determine when the first workers compensation claim for asbestos-related injury was filed against it. SVI does not have any information or documents relating to workers compensation claims made prior to 1985. Information regarding such claims post-1985 is not relevant to any issue in this litigation and will not lead to the discovery of admissible evidence. SVI is checking with its workers compensation carrier to determine whether there is any way to identify the first workers compensation claim filed against SVI for asbestos exposure.

I trust that the above information will answer your questions regarding SVI's responses to the Alameda In Re Complex interrogatories.

Very truly yours,


Jennifer Kuenster

JK/SF #219761 v1

cc: Joshua B. Baker, Esq.