

IN RE: ALL ASBESTOS-RELATED
PERSONAL INJURY OR DEATH
CASES FILED OR TO BE FILED
IN DALLAS COUNTY, TEXAS

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IN THE DISTRICT COURT
DALLAS COUNTY, TEXAS
191ST JUDICIAL DISTRICT

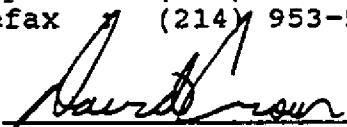
DEFENDANT'S ANSWERS AND OBJECTIONS
TO PLAINTIFFS' INTERROGATORIES AND REQUESTS FOR PRODUCTION

TO: Mr. Russell W. Budd, Baron & Budd, P.C., The Centrum,
3102 Oak Lawn Ave., Ste. 1100, Dallas, TX 75219.

COMES NOW, UNITED STATES GYPSUM COMPANY (hereinafter "U.S.
Gypsum"), Defendant in the above-entitled and numbered cause, and
files the attached Responses and Objections to Plaintiffs' Interro-
gatories and Requests for Production.

Respectfully submitted,

DeHAY & ELLISTON, L.L.P.
1500 Maxus Energy Tower
717 North Harwood Street
Dallas, Texas 75201-6508
Telephone: (214) 953-5454
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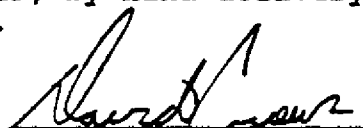
By: 

DAVID W. CROWE
State Bar No. 05164250

COUNSEL FOR DEFENDANT UNITED
STATES GYPSUM COMPANY

CERTIFICATE OF SERVICE

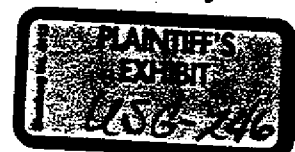
I hereby certify that a true and correct copy of the above and
foregoing document has been forwarded to counsel for Plaintiffs,
Mr. Russell W. Budd, Baron & Budd, P.C., The Centrum, 3102 Oak Lawn
Ave., Ste. 1100, Dallas, TX 75219, by hand delivery, on this 20
day of SEPT., 1993.


DAVID W. CROWE

DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'
INTERROGATORIES AND REQUESTS FOR PRODUCTION

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PREFATORY STATEMENT

United States Gypsum Company (hereinafter "U.S. Gypsum") has, to the best of its abilities, gathered non-privileged documents into a document repository for inspection by plaintiffs' counsel in response to requests for production served in asbestos litigation. These documents provide information that supplements and expands upon that provided in these answers to Interrogatories and Requests For Production. Accordingly, by way of further response to these Interrogatories and Requests For Production, U.S. Gypsum hereby offers to make available these documents at a mutually convenient time at its offices at 125 S. Franklin Street, Chicago, Illinois.

In giving its responses to Interrogatories and Requests For Production as to asbestos-containing products, U.S. Gypsum refers to products containing commercial asbestos as part of their formulation and to the type of commercial asbestos used as part of the formulation.

OBJECTIONS

U.S. Gypsum objects to the manner in which plaintiff has defined U.S. Gypsum to the extent that plaintiff purports to include in its definition of U.S. Gypsum "any of its merged, consolidated, or acquired predecessors, divisions, subsidiaries, foreign subsidiaries, foreign subsidiaries of predecessors, and/or affiliates known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products or that incorporated asbestos or asbestos-containing products into

ships or other water-going vessels. This definition includes present and former officers, directors, agents, employees, and all other persons acting or purporting to act on behalf of the corporate Defendant or its predecessors, subsidiaries, and/or affiliates known to have mined, manufactured, sold, marketed or distributed asbestos or asbestos-containing products. 'Predecessors' further means any business firm, whether or not incorporated, which had all or some of its assets purchased by you or came to be acquired by you whether by merger, consolidation, or otherwise known to have mined, manufactured, sold, marketed, utilized, or distributed asbestos or asbestos-containing products. 'Subsidiaries' further means any business firm whether or not incorporated, which is or was in any way owned or controlled, in whole or in part by Defendant or its predecessors and which is known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products. Defendant is required to produce a schematic or diagram detailing its subsidiaries, predecessors and divisions that would be included in the above definition. (See Request for Production No. 2)." In that U.S. Gypsum Company is the named defendant, this definition is overly broad and would require U.S. Gypsum to engage in unduly burdensome research, divulge privileged information and produce privileged documents. This defendant, United States Gypsum Company, responds to these Interrogatories and Requests For Production on behalf of itself.

U.S. Gypsum further objects to these Interrogatories and Requests For Production to the extent they seek information or documents protected by the attorney-client privilege and the work product rule and to the extent they seek trial preparation or expert materials or documents.

In addition, U.S. Gypsum objects to these Interrogatories and Requests For Production to the extent they ask for "identification" of voluminous documents on the ground that they are overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. As set forth infra, U.S. Gypsum will produce documents which are the proper subjects of an appropriate document request.

Finally, to this defendant's best current knowledge, information and belief, this defendant believes that its products were never used in the shipbuilding trade. This defendant never manufactured any asbestos insulation material suited for shipbuilding. Most of this defendant's asbestos-containing products were gypsum-based and therefore were not suitable for use around water, moisture, ships, etc.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1.: State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these Interrogatories.

ANSWER:

1. F. M. Poremski, Director, Financial and Accounting Services, United States Gypsum Company, has reviewed these

Responses for the purpose of satisfying the verification requirements. These Responses have been prepared based on the continual review of documents located in this defendant's files and information obtained from discussions with this defendant's employees over a period of many years. It is not possible to reconstruct each step taken to gather this information or to verify all documents which might possibly pertain to the matters at issue that have been located or examined in connection with these Responses. Nor is it possible to specifically identify by name each person who has participated in the preparation of these Responses or to identify each document which may have provided information used in preparing these Responses.

INTERROGATORY NO. 2.: For the time period during which asbestos-containing products were manufactured, assembled, sold or distributed by Defendant, and for the year preceding such activity, identify by date any meetings of the board of directors of Defendant at which the following topics were discussed:

- a. Asbestos-containing products;
- b. Asbestosis;
- c. Other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; and
- d. Dust studies that measure asbestos dust and fibers.

ANSWER:

2. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 3.: For the time period during which asbestos-containing products were manufactured, assembled, sold or distributed by Defendant, and for the year preceding such activity, identify by date any safety meetings, or meetings concerning safety issues, at any plant or other facility of Defendant where the following topics were discussed:

- a. Asbestos-containing products;
- b. Asbestosis;
- c. Other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; and
- d. Dust studies that measure asbestos dust and fibers.

ANSWER:

3. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 4.: Identify any asbestos-containing products manufactured by other companies that were sold and/or distributed by Defendant, its predecessors and/or subsidiaries. State the time periods during which any such products were sold and/or distributed.

ANSWER:

4. In the 1950's - 1970's, U. S. Gypsum purchased asbestos cement board from National Gypsum Company, which was reshipped as received. In addition, U. S. Gypsum drilled this material and rebranded it for sale and use as asbestos lay-in panels in the late 1950's. U. S. Gypsum also purchased pipe covering from a company believed to be named Baldwin-Ehret-Hill in the 1930's.

U. S. Gypsum purchased adhesive products for resale from W. W. Henry Company and a company believed to be a subsidiary of Sherwin Williams, but U. S. Gypsum has been unable to confirm dates of such purchases.

INTERROGATORY NO. 5.: Identify by name and location each plant owned, operated, or at any time bought by or under the control of Defendant in which asbestos-containing products were manufactured, assembled, or prepared for sale or marketing, and state the time periods during which the activity took place.

ANSWER:

5. See attached Schedule D.

INTERROGATORY NO. 6.: For each plant identified in Interrogatory No. 5, and for the time periods identified therein, list the dates, if any, in which ventilation systems were installed, or modifications to improve ventilation were made to existing systems. Provide a brief description of the changes made.

ANSWER:

6. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 7.: For each plant identified in Interrogatory No. 5, and for the time periods identified therein, list the dates, if any, on which respirators were provided to employees.

ANSWER:

7. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 8.: For each plant identified in Interrogatory No. 5, and for the time periods identified therein, list the dates, if any, on which warnings about the health hazards of asbestos were issued to employees.

ANSWER:

8. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 9.: Identify by name and location each plant ever owned, operated or at a later date bought or under control of Defendant in which asbestos-containing products were used, and state the time periods during which such products were used at each plant.

ANSWER:

9. Objection. With respect to the term "used", this defendant objects in that it is vague and ambiguous. Further, there has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 10.: For each plant identified in Interrogatory No. 9, and for the time periods identified therein, list the dates, if any, on which ventilation systems were installed, or modifications to improve ventilation were made to any existing ventilation systems. Provide a brief description of the changes made.

DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'
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ANSWER:

10. Objection. See this defendant's response to Interrogatory No. 9.

INTERROGATORY NO. 11.: For each plant identified in Interrogatory No. 9, and for the time periods identified therein, list the dates, if any, on which respirators were provided to any employees using asbestos-containing products.

ANSWER:

11. Objection. See this defendant's response to Interrogatory No. 9.

INTERROGATORY NO. 12.: For each plant identified in Interrogatory No. 9, and for the time periods identified therein, list the dates, if any, on which warnings about the health hazards of asbestos were issued to employees.

ANSWER:

12. Objection. See this defendant's response to Interrogatory No. 9.

INTERROGATORY NO. 13.: Prior to 1990, did any person file a claim against a Workers' Compensation carrier covering Defendant, its predecessors, and/or its subsidiaries, alleging that he/she contracted a disease from inhaling asbestos fibers while employed by Defendant, its predecessors, and/or its subsidiaries? If so, provide:

- a. A list of the claims, including each claimant's name, address, and the date each claim was filed, and including the caption and jurisdiction of the claim;
- b. The disease alleged in each such claim;
- c. A brief summary of the disposition of each such claim; and
- d. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER:

13. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 14.: State the time periods, if any, during which Defendant was a member of each of the following organizations:

- a. Asbestos Textile Institute (ATI);
- b. Quebec Asbestos Mining Association (QAMA);
- c. National Insulation Manufactures Association (NIMA);
- d. Industrial Hygiene Foundation (IHF);
- e. Air Hygiene Foundation (AHF);
- f. Asbestos Information Association (AIA); and
- g. American Conference of Governmental Industrial Hygienists (ACGIH).

ANSWER:

14. See attached Exhibit No. 1.

INTERROGATORY NO. 15.: State the dates and amounts of any financial contributions that were made by this Defendant to each of the following organizations:

- a. Asbestos Textile Institute (ATI);
- b. Quebec Asbestos Mining Association (QAMA);
- c. National Insulation Manufactures Association (NIMA);
- d. Industrial Hygiene Foundation (IHF);
- e. Air Hygiene Foundation (AHF);
- f. Asbestos Information Association (AIA); and
- g. American Conference of Governmental Industrial Hygienists (ACGIH).

ANSWER:

15. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 16.: Has any employee or agent of Defendant ever testified before any governmental entity regarding asbestos, asbestos-containing products or diseases related to the inhalation of asbestos dust or fibers? If so, provide the name of each person so testifying, and the name, date and location of each hearing.

ANSWER:

16. A copy of the testimony presented by Thaddeus S. Snell at a hearing conducted by the Environmental Protection Agency in 1984 will be made available through the offices of U. S. Gypsum at 125 South Franklin Street, Chicago, Illinois.

INTERROGATORY NO. 17.: Before 1974, did Defendant ever furnish any papers, documents, internal memoranda, or other writings concerning asbestos-related diseases and/or the health hazards of inhaling asbestos dust and fibers to the United States Public Health Service or to any other governmental agencies? If so, identify the writings and the dates they were so furnished.

ANSWER:

17. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 18.: Before 1974, did Defendant ever furnish any papers, documents, internal memoranda, or other writings concerning asbestos-related disease and/or the health hazards of inhaling asbestos dust and fibers, to the United States Navy or United States Naval Facilities? If so, identify the writings and the dates they were so furnished.

ANSWER:

18. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 19.: Did Defendant ever provide any information to a military or other governmental entity concerning the health hazards of inhaling asbestos dust and fibers that was used, or was intended to be used, in the drafting of military specifications for the use of asbestos-containing products?

ANSWER:

19. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 20.: Did Defendant ever provide information to a military or other governmental entity that was used or intended to be used in drafting military specifications for the design of asbestos-containing products? If so, for each identify:

- a. State the name of the entity;
- b. Describe the information provided; and
- c. Give the dates on which the information was provided.

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ANSWER:

20. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 21.: Did any employee or agent of Defendant ever receive a copy of any of the following articles? If so, for each article, state the name of the recipient and the date the article was received:

- a. WALDEMAR DREESSEN, "A Study of Asbestosis in the Asbestos Textile Industry," U.S. Treasury Dept. Public Health Bull. No. 241, August, 1938.
- b. WALTER FLEISCHER, PHILLIP DRINKER, et al., "Health Survey of Pipe Covering Operations in Constructing Naval Vessels," Journ. Industrial Hyg. & Tox. 28:9 (1946).
- c. RICHARD DOLL, "Mortality from Lung Cancer in Asbestos Workers," Brit. J. Industr. Med. 12: 81-86 (1955)
- d. E.R.A. MEREWETHER, "The Occurrence of Pulmonary Fibrosis and Other Pulmonary Affections in Asbestos Workers," J. Ind. Hyg., Vol. XII (1930).

ANSWER:

21. a. This defendant has a copy of this document in its document collection. However, this defendant cannot ascertain whether a copy of this document was received contemporaneously to its publication.
- b. Not to this defendant's best current knowledge, information, and belief.
- c. Not to this defendant's best current knowledge, information, and belief.
- d. With respect to an article entitled, "The Occurrence of Pulmonary Fibrosis and Other Pulmonary Afflictions in Asbestos Workers", this defendant has a copy of this document in its document collection. However, this defendant cannot ascertain whether a copy of this document was received contemporaneously to its publication.

INTERROGATORY NO. 22.: Has Defendant ever conducted any tests or studies concerning the effects of the inhalation of asbestos dust or fibers on the animal or human respiratory system? If so, provide the name, date, and location of each test or study and

state by whom in the corporation the report of the results was received.

ANSWER:

22. U.S. Gypsum Company contributed to a study conducted beginning approximately 1936 by Dr. Gardner of the Saranac Laboratory. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 23.: Has Defendant ever litigated the issue of insurance coverage in a case involving exposure to asbestos? If so, for each case state:

- a. the names of the parties, the court, and the case number;
- b. the filing date;
- c. the name and address of the attorneys representing the insurance carrier; and
- d. whether the case has been settled.

ANSWER:

23. Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, see attached Exhibit No. 2.

INTERROGATORY NO. 24.: Has Defendant ever conducted any tests or studies concerning the health hazards to an individual exposed to both asbestos dust/fibers and tobacco smoke? If so, provide the names and dates of each test or study.

ANSWER:

24. Not to this defendant's best current knowledge, information, and belief.

INTERROGATORY NO. 25.: To date, has Defendant furnished any information to consumers, other users of asbestos-containing products, or to the general public, about the health hazards to an individual exposed to both asbestos dust/fibers and tobacco smoke? If so, state how and when this information was conveyed.

ANSWER:

DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'
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25. Not to this defendant's best current knowledge, information, and belief.

INTERROGATORY NO. 26.: To date, has Defendant ever attempted to recall its asbestos-containing products?

ANSWER:

26. U. S. Gypsum has not conducted a recall of any of its products because of any alleged health hazards associated with asbestos.

INTERROGATORY NO. 27.: Describe in detail:

- a. How your documents relating to asbestos, asbestos diseases, and asbestos-containing products are maintained;
- b. How your documents relating to asbestos, asbestos diseases and asbestos-containing products are organized; and
- c. Where these documents are kept.

ANSWER:

27. Documents responsive to this Interrogatory are found in this defendant's Asbestos Litigation Document Repository, located at 125 South Franklin Street, Chicago, IL 60606. See attached Exhibit 3.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce copies of the minutes of any meetings of the board of directors of Defendant at which the following topics were discussed:

- a. Asbestos-containing products;
- b. Asbestosis;
- c. Other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; and
- d. dust studies that measure asbestos dust and fibers.

RESPONSE:

1. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 2: Produce copies of the minutes of any safety meetings or any meetings at any plant or facility of Defendant where the following topics were discussed:

- a. Asbestos-containing products;
- b. Asbestosis;
- c. Other asbestos-related diseases, including but not limited to lung cancer, mesothelioma, pleural plaques; and
- d. dust studies that measure asbestos dust and fibers.

RESPONSE:

2. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 3: Produce copies of the patents obtained for the asbestos-containing products manufactured, assembled, and/or prepared for sale or marketing by Defendant.

RESPONSE:

3. This defendant is aware that it held a patent for at least one of the above-stated products, that product being K-FAC. As related to the other specified products, to the extent such information is available to United States Gypsum Company and would not require it to undertake an unreasonable investigation at an unreasonable cost, it is contained in documents which United States Gypsum Company will provide through its offices at 125 S. Franklin Street, Chicago, IL 60606.

REQUEST FOR PRODUCTION NO. 4: Produce copies of the patents obtained for those asbestos-free products intended to be substitutes for asbestos-containing products manufactured, assembled, or prepared for sale or marketing by Defendant.

RESPONSE:

4. Objection. This Request is overbroad in that it is not limited to asbestos, the focus of this litigation.

REQUEST FOR PRODUCTION NO. 5: Produce copies of the testimony of each and every employee or agent of Defendant at each and every hearing by a governmental entity concerning asbestos, asbestos-containing products, or diseases related to the inhalation of asbestos dust and fibers.

RESPONSE:

5. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 6: Produce copies of every test or study that measured the asbestos fibers or measured the asbestos dust and/or fiber levels at every plant owned, operated, bought by or under the control of Defendant. Provide the dates for each test or study.

RESPONSE:

6. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 7: Produce copies of every test or study received by Defendant that measured asbestos fibers or measured asbestos dust and/or fiber levels at the Thetford Mines.

RESPONSE:

7. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 8: Produce all documents in the possession, custody, or control of Defendant relating to the Braun & Traun study done for the Quebec Asbestos Mining Association.

RESPONSE:

8. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 9: Produce copies of all documents which contain any reference to tests or studies that found either asbestos dust, or total dust including asbestos, in quantities exceeding 2 million particles per cubic foot of air, at any plant owned, operated, bought by or under the control of Defendant, during the manufacture, assembly, or preparation for sale or assembly, of any asbestos-containing products.

RESPONSE:

9. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 10: Produce copies of all documents which contain any reference to tests or studies which found either asbestos dust, or total dust including asbestos, in quantities exceeding 5 million particles per cubic foot of air, at any plant owned, operated, bought by or under the control of Defendant, during the use of any asbestos-containing products.

RESPONSE:

10. Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore, this Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 11: Produce copies of any and all tests or studies conducted by Defendant concerning the effects of the inhalation of asbestos dust or fibers on animal or human respiratory systems.

RESPONSE:

11. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

REQUEST FOR PRODUCTION NO. 12: Produce copies of all documents produced during the course of Defendant's litigation with any insurance carrier concerning exposure to asbestos.

RESPONSE:

12. Objection. This Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 13: Produce copies of all depositions taken by any party during the course of Defendant's litigation with any insurance carrier concerning exposure to asbestos.

RESPONSE:

13. Objection. This Request is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 14: Produce copies of any tests or studies conducted by, or received by, Defendant concerning the health hazards to an individual exposed to both asbestos dust/fibers and tobacco smoke.

RESPONSE:

14. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

I, F. M. Poremski, declare:

I am the Director, Financial & Accounting Services of United States Gypsum Company, one of the above named defendants, and am authorized to make this verification for and on behalf of said company;

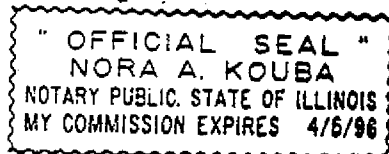
I have read the foregoing Answers, Objections, and other Responses to Plaintiff's Interrogatories and am informed and believe that the same is true and on that ground allege that the matters therein stated are true.

I declare, under penalty of perjury, that the foregoing is true and correct, and that this declaration was executed on September 16, 1993 in Chicago, Illinois.

F. M. Poremski
F. M. Poremski

Subscribed and sworn to before me
this 16th day of September 1993.

Nora A. Kouba
Notary Public



ASBESTOS-CONTAINING PRODUCTS MANUFACTURED BY U.S. GYPSUM

The dates listed here are taken from product operating bulletins which governed the manufacturing process. The cancellation of these operating bulletins usually coincided with cessation of production, but occasionally bulletins would remain uncanceled after the manufacture of a product had been discontinued. Consequently, the years shown for cancellation of authorization are believed to be the last possible year of manufacture, although manufacture may have in fact ended earlier. Production dates established through documentation other than product operating bulletins have been footnoted. Temporary and trial production runs are included (along with regular production). These have been footnoted for Firecode and can be determined for other products from a review of operating bulletins. With texture products, such runs were occasionally given slight name variations.

<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SABINITE ¹	Acoustical Plaster	1930	1945	East Chicago, IN
		1930	1964 ²	Fort Dodge, IA
		1930	1945	Gypsum, OH
		1930	1946	Midland, CA
		1939	1945	Nephi, UT
		1930	1964 ²	New Brighton, NY
		1931	1964	Hagersville, CAN ³
		1931	1948	Hillsborough, CAN ³
RED TOP ACOUSTICAL PLASTER	Acoustical Plaster	1951	1953	Fort Dodge, IA
		1951	1953	New Brighton, NY
HI-LITE	Acoustical Plaster	1953	1954	Fort Dodge, IA ⁴
		1953	1954	New Brighton, NY ⁴
		1955	1972	Fort Dodge, IA
		1955	1972	New Brighton, NY
AUDICOTE ⁵	Acoustical Plaster	1954	1972	Fort Dodge, IA
		1954	1972	New Brighton, NY
		1955	1956	Midland, CA ⁶
		1961	1975	Hagersville, CAN ³

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP GYPSUM PLASTER (marketed as CEMENT PLASTER until 1967)'	Building Plaster	1943 1950 1944 1955 only	1947 1971 1974	Loveland, CO Hagersville, CAN ³ Hillsborough, CAN ³ Montreal, CAN ³
RED TOP GYPSUM PLASTER FOR MACHINE APPLICATION (marketed as CEMENT PLASTER FOR MACHINE APPLICATION until 1967)'	Building Plaster	1961 1961 1962 1959 only 1957 1957	1966 1966 1966 1972 1972	Detroit, MI Gypsum, OH Oakfield, NY Southard, OK ⁸ Hagersville, CAN ³ Montreal, CAN ³
RED TOP TROWEL FINISH	Building Plaster	1930 1930 1950 1930 1930	1935 1935 1951 1935 1935	East Chicago, IN Fort Dodge, IA Fort Dodge, IA Gypsum, OH New Brighton, NY
WAINSCOAT TROWEL FINISH	Building Plaster	1946 1946 only	1953	Fort Dodge, IA Southard, OK
ORIENTAL INTERIOR FINISH	Building Plaster	1942 1942 1942 1949 1942 1942 1949 1942	1944 1972 1944 1950 1946 1971; 1972 1950 1972	Boston, MA Fort Dodge, IA Gypsum, OH Jacksonville, FL Milwaukee, WI New Brighton, NY Norfolk, VA Oakfield, NY

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
		1942	1944	Philadelphia, PA
		1949	1973	Philadelphia, PA
		1942	1973	Sweetwater, TX
ORIENTAL EXTERIOR FINISH STUCCO'	Building Plaster	1932	1944	Boston, MA
		1930	1973	Fort Dodge, IA
		1930	1944	Gypsum, OH
		1949	1972	Jacksonville, FL
		1932	1946	Milwaukee, WI
		1930	1972	New Brighton, NY
		1949	1973	Norfolk, VA
		1930	1972	Oakfield, NY
		1932	1944	Philadelphia, PA
		1949	1972	Philadelphia, PA
		1930	1972	Sweetwater, TX
		1964	1974	Montreal, CAN ³
RED TOP PATCHING PLASTER	Building Plaster	1929	1947	Gypsum, OH
		1942	1951	Milwaukee, WI
		1929	1946	Nephi, UT
		1929	1947	New Brighton, NY
		1944	1947	South Gate, CA
RED TOP COVER COAT FINISH PLASTER	Building Plaster	1948	1964	New Brighton, NY
		1948	1954	Southard, OK
		1956 only		Southard, OK

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP WOOD .	Building	1931	1941	Detroit, MI
FIBER PLASTER	Plaster	1945	1963	Detroit, MI
REGULAR BASECOAT		1930	1972	East Chicago, IN
		1952	1960	Empire, NV
		1931	1963	Fort Dodge, IA
		1948	1952	Gerlach, NV
		1931	?	Gypsum, OH
		1945	1972	Heath, MT
		1940	?	Laramie, WY
		1945	1966	Loveland, CO
		1945	1959	Midland, CA
		1945	1952	Nephi, UT
		1931	1940	Oakfield, NY
		1945	1960	Plaster City, CA
		1948	1972	Sigurd, UT
		1931	1967	Southard, OK
		1936	1965	Sweetwater, TX
RED TOP WOOD FIBER	Building	1961	1972	East Chicago, IN
PLASTER MACHINE	Plaster	1963	1966	Fort Dodge, IA
APPLICATION-BASECOAT		1960	1961	Plaster City, CA

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
RED TOP STRUCTOLITE PLASTER FOR MACHINE APPLICATION-BASECOAT ⁷	Building Plaster	1955	1962	Boston, MA
		1955	1962	Detroit, MI
		1971	1972	Detroit, MI
		1954	1963	East Chicago, IN
		1954	1960	Empire, NV
		1955	1963	Fort Dodge, IA
		1964	1973	Fort Dodge, IA
		1955	1962	Gypsum, OH
		1955	1962	Jacksonville, FL
		1955	1962	Loveland, CO
		1955	1959	Milwaukee, WI
		1955	1963	New Brighton, NY
		1955	1962	Norfolk, VA
		1955	1962	Oakfield, NY
		1955	1962	Philadelphia, PA
		1958	1963	Plaster City, CA
		1955	1962	Plasterco, VA
		1957	1962	Shoals, IN
		1954	1962	Southard, OK
		1954	1963	Sweetwater, TX
RED TOP BONDCRETE PLASTER-BASECOAT ⁷	Building Plaster	1940	1943	Midland, CA
		1964	1975	Hagersville, CAN ³
		1961	1970	Montreal, CAN ³
RED TOP SANDED WALL PLASTER ⁷	Building Plaster	1937	1940	Black Rock, NY
		1931	1937	Detroit, MI
PYROBAR MORTAR MIX ⁷	Tile Cement	1967	1970	East Chicago, IN
		1965	1972	New Brighton, NY
ACOUSTONE 120	Ceiling	1968	1976	Gypsum, OH
	Tile	1968	1976	Walworth, WI

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
ACOUSTONE 180	Ceiling Tile	1966	1975	Gypsum, OH
		1966	1975	Walworth, WI
RED TOP FIRECODE PLASTER	Fireproofing Plaster	1962	1963	Boston, MA'
		1962	1963	Detroit, MI'
		1959 ¹⁰	1964	East Chicago, IN
		1960	1964	Empire, NV
		1959 ¹⁰	1964	Fort Dodge, IA
		1961	1964	Gypsum, OH
		1959 ¹⁰	1964	New Brighton, NY
		1962	1963	Oakfield, NY'
		1962	1963	Philadelphia, PA'
		1961	1963	Sperry, IA
		1962	1963	Stony Point, NY'
		1964 only		Hagersville, CAN ³ ,
RED TOP FIRECODE "V" PLASTER	Fireproofing Plaster	1965	1969	Baltimore, MD
		1962	1963	Boston, MA'
		1962	1963	Detroit, MI'
		1962	1969 ¹¹	East Chicago, IN
		1962	1969 ¹¹	Empire, NV
		1964	1965	Fort Dodge, IA
		1962	1963	Galena Park, TX'
		1962	1968	Gypsum, OH
		1963	1967	Midland, CA
		1962	1969 ¹¹	New Brighton, NY
		1962	1963	Oakfield, NY'
		1962	1963	Philadelphia, PA'
		1967	1968	Plaster City, CA
		1962	1963	Stony Point, NY'
		1963	1969	Sweetwater, TX
		1963	1969 ¹¹	Hagersville, CAN ³

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SPRAYDON STANDARD A ¹²	Fireproofing	1965 1965 1970	1971 1971 1971	Plainfield, NJ Torrance, CA Weston, CAN ³
SPRAYDON STANDARD G ¹²	Fireproofing	1968 1968 1970 only	1970 1970	Plainfield, NJ Torrance, CA Weston, CAN ³
SPRAYDON POWERCOTE ¹²	Thermal Insulation	1969 1969 1969 1970	1971 1971 1971 1971	Plainfield, NJ Torrance, CA Corsicana, TX ¹³ Weston, CAN ³
K-FAC INDUSTRIAL INSULATING BLOCK	Rigid Block Insulation	1943	1950	East Chicago, IN
K-FAC 19 ¹⁴	Rigid Block Insulation	1970	1971	Greenville, MS
FIRE DOOR COREBOARD ¹⁵	Fire Board	1966	1971	Greenville, MS
COLUMN FIRE BOARD ¹⁶	Fire Board	1966 only		Greenville, MS
SHEETROCK RADIANT HEAT FILLER - MACHINE APPLICATION	Plaster	1968 1969 1968 1969	1971 1971 1971 1971	Baltimore, MD Boston, MA Detroit, MI East Chicago, IN

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
		1970	1972	Empire, NV
		1968	1971	Ft. Dodge, IA
		1969	1971	Gypsum, OH
		1969	1971	New Brighton, NY
		1968	1971	Norfolk, VA
		1969	1971	Philadelphia, PA
		1968	1971	Plaster City, CA
		1969	1970	Shoals, IN
		1969	1972	Sweetwater, TX
PAC-TEX TEXTURE PAINT	Texture	1962	1963	Dallas, TX
		1943	1970	South Gate, CA
		1949	1962	Sweetwater, TX
A-B TEX TEXTURE PAINT	Texture	1959	1973	Chamblee, GA
		1935	1949	Gypsum, OH
		1954	1973	Gypsum, OH
		1973 only		Midway, IL
		1935	1949	New Brighton, NY
		1954	1968	New Brighton, NY
		1943	1944	South Gate, CA
		1954	1973	South Gate, CA
		1948	1950	Sweetwater, TX
		1954	1955	Sweetwater, TX
		1962	1977	Hagersville, CAN ³
		1966	1967	Montreal, CAN ³
TEXTURE PAINT	Texture	1959	1973	Chamblee, GA
		1964	1973	Dallas, TX
		1930	1973	Gypsum, OH
		1937	1973	New Brighton, NY
		1948	1970	South Gate, CA
		1948	1964	Sweetwater, TX

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
TEXOLITE DRY FILL	Texture	1959	1961	New Brighton, NY ¹⁷
TEXOLITE DRYWALL SURFACER, AGGREGATED, renamed DRYWALL SURFACER, TEXTURE XII, in 1965	Texture	1963 1961 1970 1963 1963	1965 1977 1972 1965 1965	Dallas, TX Gypsum, OH Midway, IL New Brighton, NY South Gate, CA
SPRAY TEXTURE PAINT (or FINISH)	Texture	1961 1961 1960 1970 1966 1956 1959	1976 1976 1976 1976 1968 1973 1961	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY South Gate, CA Sweetwater, GA
MULTI-PURPOSE TEXTURE FINISH	Texture	1964 1963 1965 1971 1965	1976 1976 1976 1976 1966	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
IMPROVED SPRAY TEXTURE B-8	Texture	1963	1973	South Gate, CA
SANDED, COLORED TEXTURE PAINT	Texture	1952 1952	1953 1955	New Brighton, NY Sweetwater, TX
CONCRETE CEILING TEXTURE	Texture	1970	1973	South Gate, CA
TEXTONE TEXTURE FINISH	Texture	1959 1962	1972 1972	Chamblee, GA Dallas, TX

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
		1928	1975	Gypsum, OH
		1937	1972	New Brighton, NY
		1944	1972	South Gate, CA
		1949	1972	Sweetwater, TX
		1965	1977	Hagersville, CAN ^{1,18}
TEXOLITE		1961	1966	Chamblee, GA
BLOCK FILLER		1966	?	Dallas, TX
		1958	?	Gypsum, OH
		1958	?	New Brighton, NY
		1959	1966	South Gate, CA
		1959	1966	Sweetwater, TX
SHEETROCK	Texture	1966	1974	Dallas, TX
SMOOTHCOAT		1965	1974	Gypsum, OH
		1971	1974	Midway, IL
SHEETROCK RADIANT HEAT SIMULATED ACOUSTICAL TFXTURE	Simulated Acoustical Ceiling Texture	1970	1972	South Gate, CA
SPECIAL TEXTURE PAINT	Texture	1962	1972	Dallas, TX
		1955 only		New Brighton, NY
		1954	1964	Sweetwater, TX
TEXTURE XII, SUPER VINYL	Texture	1970	1976	Gypsum, OH
		1970	1976	Midway, IL
AGGREGATED SPRAY FINISH, WHITE	Texture	1967	1968	Dallas, TX
		1964	1968	Gypsum, OH
		1971 only		Midway, IL

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
SMOOTH HARD FINISH	Texture	1968	1969	South Gate, CA
SUPERHARD SPRAY TEXTURE FINISH	Texture	1968	1969	South Gate, CA
EXTERIOR TEXTURE WALLBOARD FINISH	Texture	1971 1971	1973 1972	Dallas, TX South Gate, CA
SIMULATED ACOUSTICAL SPRAY TEXTURE/FINISH	Simulated Acoustical Ceiling Texture	1964 only 1963 1959 1961 1959 1961	 1964 1964 1964 1964 1962	Chamblee, GA Dallas, TX Gypsum, OH New Brighton, NY South Gate, CA Sweetwater, TX
"QT" SIMULATED ACOUSTICAL SPRAY TEXTURE	Simulated Acoustical Ceiling Texture	1963	1973	South Gate, CA
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-REGULAR	Simulated Acoustical Ceiling Texture	1964 1967 1964 1966 only 1968	1965 1969 1968 1973	Dallas, TX Dallas, TX New Brighton, NY South Gate, CA South Gate, CA
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-LC	Simulated Acoustical Ceiling Texture	1965 1965 1965 1965 1966 only	1968 1968 1966 1966	Dallas, TX Gypsum, OH New Brighton, NY Hagersville, CAN ³ Montreal, CAN ³

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
IMPERIAL "QT" (SPRAY) TEXTURE FINISH - NC-LC	Simulated Acoustical Ceiling Texture	1968 1966 1966 1970 1966	1976 1974 1976 1975 1975	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-EXTRA HARD FINE	Simulated Acoustical Ceiling Texture	1964 1964 1964 1964	1974 1971 1974 1973	Chamblee, GA Dallas, TX Gypsum, OH New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-VERMICULITE, COARSE and REGULAR	Simulated Acoustical Ceiling Texture	1967 1966 1968 1970 1968	1976 1976 1976 1976 1976	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-POLYSTYRENE, COARSE and REGULAR	Simulated Acoustical Ceiling Texture	1967	1976	Dallas, TX
IMPERIAL "QT" (SPRAY) TEXTURE FINISH-NC4	Simulated Acoustical Ceiling Texture	1968 1968 1967 1970 1967	1972 1971 1972 1972 1972	Chamblee, GA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY
READY-MIXED IMPERIAL "QT" SPRAY FINISH	Simulated Acoustical Ceiling Texture	1966	1967	New Brighton, NY

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
THERMALUX RADIANT HEATING PANELS	Radiant Heating Panels	1964	1969	Shoals, IN (assembled)
<u>Other Products (by generic group)</u>				
PIPECOVERINGS, ASBESTOS PAPER, ASBESTOS BOARD		1936	1938 ¹⁹	Jersey City, NJ
PASTE SPACKLING PUTTY		1952	1975	Chamblee, GA Gypsum, OH New Brighton, NY Sweetwater, TX
JOINT COMPOUNDS		1920's?	1976	Calgary, CAN ^{3,20} Chamblee, GA Dallas, TX East Chicago, IN Gypsum, OH Hagersville, CAN ^{3,20} Jacksonville, FL Midway, IL Montreal, CAN ^{3,20} New Brighton, NY South Gate, CA Sweetwater, TX
ADHESIVES		1953 1973 1968 1955 1971	1973 1974 1973 1965 1977	Gypsum, OH Midway, IL ¹⁶ Nashville, TN New Brighton, NY Rosemont, IL ²¹

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<u>Product Name</u>	<u>Product Type</u>	<u>First Authorized For Production With Asbestos</u>	<u>Cancellation of Authorization</u>	<u>Manufacturing Locations</u>
		1961	1972	South Gate, CA
		1957	1962	Sweetwater, TX
		1974	1977	Trenton, NJ ²²
SIDING SHINGLES		1937	1975	East Chicago, IN
ROOFING PRODUCTS		1936	1975	Jersey City, NJ
		1967	1978	Mt. Dennis, CAN ³
		1967	1978	St. Hubert St., CAN ³
		1934	1975	St. Paul, MN
		1934	1960	South Bend, IN
		1954	1977 ²³	South Gate, CA
		1937	1960	Toronto, CAN ³
		1967	1978	Vancouver, CAN ³
INSULATING CEMENT		1936	1938	Jersey City, NJ

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NOTE:

Not all products were necessarily made at all plants at all times listed, even though they were authorized for production.

- ¹ At some period of time between 1926 and 1930, Sabinite is believed to have been manufactured at U.S. Gypsum's plant at Arden, Nevada. However, no bulletins for that plant have been located, it having been closed in 1930.
- ² Sabinite may have been produced until this date, but sales diminished substantially by the mid-1950's.
- ³ Not sold in the United States.
- ⁴ Two-component Hi-Lite plaster was authorized for production in June 1953 and discontinued in August 1954. Approximately 4 tons of a temporary variant was produced during 1953, and packaged as "Lime-Keene's Acoustical Plaster."
- ⁵ Marketed as Red Top Acoustical Plaster with the word 'Spray' stenciled on the bag from 1954 to 1955; marketed as Red Top Spray On Acoustical Plaster in 1955; marketed as Red Top Audicote Acoustical Plaster from 1955 to 1968.
- ⁶ A trial job of 3 tons only.
- ⁷ Contained less than 1.0% asbestos (not asbestos-containing products under applicable law).
- ⁸ Two month production run only.
- ⁹ Temporary production of Firecode only.
- ¹⁰ Trial jobs were produced in 1959 for tests by Underwriters' Laboratories; regular production commenced in 1960.
- ¹¹ As of December of 1969 Firecode V had been dropped from U.S. Gypsum's product line and sales of this product had not been actively solicited by the company for some time. U.S. Gypsum believes that a limited quantity of Firecode V was produced in early 1970 at the East Chicago plant for the completion of a single job already in progress.

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- 12 U.S. Gypsum manufactured SprayDon pursuant to the specifications of Sprayon Research Corporation. While Types A and G remained on operating bulletins until 1973, production of G was discontinued in 1970, and A was discontinued on January 1, 1972. Type I, though authorized, was never produced.
- 13 From production records.
- 14 K-Fac 19 was produced for A.P. Green and packaged and sold by that company under the name INSBLOK. Information contained in plant records suggests that production may have commenced in 1969.
- 15 Information contained in plant records suggests that production may have commenced in 1965.
- 16 Temporary production only.
- 17 Trial job authorized for temporary production only on and off from 1959 to 1961.
- 18 Marketed from 1970 to 1977 as Sheetrock Texture Finish Paint in Canada.
- 19 Although authorization to manufacture these products was not cancelled until 1940, the last sales took place in 1938.
- 20 Actual Canadian production ceased in 1978.
- 21 This product line was manufactured by a company that became a U.S. Gypsum subsidiary in 1971, and records of the production history are incomplete.
- 22 Records regarding the production history of this product line are incomplete.
- 23 Though authorized for production until 1978, actual production ceased in 1977.

Most of the products identified in this exhibit have a shelf life of approximately six months, with some variation due to humidity and storage conditions. It is the policy of the defendant to provide this information to all customers. Therefore, date of last production approximates date of last sale, though U.S. Gypsum is not certain whether shelf life guidelines were adhered to by its customers. Reasonable investigation is continuing.

Further information concerning products which are established to be at issue is contained in documents which will be made available for inspection at the offices of United States Gypsum, 125 South Franklin Street, Chicago, IL 60606-4678.

The following represents this defendant's best current information:

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY</u>
Gypsum Association	1930-present	Asbestos discussed at all of the following: <u>Membership meetings:</u> 10/27/71 - 10/28/71 - E. W. Duffy, W. W. Holloway, A. J. Watt 4/5/72 - J. H. Crumbaugh, A. R. Rump, C. G. Gramor, A. J. Watt, M. L. Hepsher, W. W. Holloway 4/4/73 - J. S. Bush, W. W. Holloway, A. J. Watt, C. G. Gramor, J. D. May, J. J. McLaughlin 10/10/73 - 10/12/73 - W. W. Holloway, A. J. Watt <u>Safety Committee Meetings:</u> 9/20/66 - P. D. Fix, G. R. Krug 9/17/67 - C. P. Kipp 3/19/68 - 3/20/68 - G. R. Krug 10/25/71 - W. E. Halley, J. D. Cornell, J. M. Rochers 9/19/73 - J. D. Cornell 3/7/74 - J. D. Cornell, M. R. Helton 8/14/74 - J. D. Cornell <u>Manufacturing & Mining Committee:</u> 4/3/73 - W. W. Holloway, H. D. Gobrecht	Minutes of meetings, but these documents are not in this defendant's files - produced to this defendant in litigation by Gypsum Association. This defendant does not know if such individuals actually attended meetings listed in documents produced to this defendant by Gypsum Association in other litigation. Also, some test results are in this defendant's files.

HEALTH HAZARDS OF ASBESTOS
DISCUSSED AT MEETINGS
ATTENDED BY UNITED STATES
GYPSUM COMPANY PERSONNEL

DOCUMENTS AVAILABLE TO
UNITED STATES GYPSUM
COMPANY

ORGANIZATION DATES OF
MEMBERSHIP

Gypsum
Association
(cont.)

Manufacturing & Mining Committee:

4/9/74 - W. W. Holloway

10/8/74 - W. W. Holloway,
H. D. Gobrecht

8/10/76 - J. D. Cornell,
K. E. Mohler, W. Lewis

Technical Committee:

2/14/73 - 12/16/73 -
J. H. Crumbaugh

8/1/73 - 8/3/73 -
J. H. Crumbaugh, A. L.
Hampton, R. L. Selbe

11/73 and 1/74 - unknown

2/13/74 - 2/15/74 -
J. H. Crumbaugh

8/7/74 - 8/9/74 -
J. H. Crumbaugh,
R. L. Selbe

Board of Directors:

4/5/73, 10/12/73 -
A. J. Watt

Industrial
Health
Foundation
(But not
Industrial
Hygiene
Foundation)

1974-1981
(budget cut-
backs forced
United States
Gypsum
Company
to drop
membership)

No business meetings

Some "discussionals"

Asbestos was discussed at
the following meetings:

Introduction to Industrial Hygiene
Asbestos Sampling
Chemicals for Industrial Hygiene
C. Roe 1978-1979

Toxicology Chemicals and Engineering
S. H. Berning - 1/10/79 - 1/21/79

Industrial Hygiene Digest
Monthly Abstracts -
1/74 - 12/81 (JDC's)

Annual Business Reports
(JDC's)

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY
		Industrial Hygiene Techniques Update, Advanced Industrial Hygiene S. H. Berning - 11/12/79 - 11/14/79	
		Seminar Regarding Industrial Health J. D. Cornell - 6/8/75 - 6/9/75	
		Other personnel involved: J. D. Cornell, S. H. Berning, K. S. Freeman, C. Roe	
Lime Association	exact date unknown	unknown	none
*National Insulation Manufacturers Association (Founded in 1958) (Now TIMA) Thermal Insulation Manufacturers Association	1973-1974 1974-present	unknown none	Minutes produced in other litigation (Wm. Simpson deposition) (1958-?) Some mass correspondence letters regarding committees J. D. Cornell was on - health and safety, public information, medical and scientific dated 1978 to the present.
National Insulation Contractors Association (Associate Member)	unknown (perhaps 1972-present?)	none	NICA by Laws dated 1975; NICA's 1981 Annual Report.
National Safety Council	1914-present	none	Transactions from 1912-1978 records of all presentations and papers produced at Phillip E. Schmidt, deposition and document production April 17, 1984, in <u>Neil Wood</u>
National Mineral Wool Association	1943?-1957 mid-1960's mid-1970's	none	none

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY</u>
*Contracting Plaster and Lathers International (Associate Member)	1960-1969	none	Some documents in M. V. Cook's and J. Edwards' file
*International Association of Wall and Ceiling Contractors (Associate Member)	1970-1976	none	Some documents in M. V. Cook's and J. Edwards' file
*Gypsum Drywall Contractors International (Associate Member)	1960-1976 unknown	none	Some documents in M. V. Cook's and J. Edwards' file
*Association of Wall and Ceiling Contractors Industries International - Gypsum Drywall Contractors International (Associate Member)	1976-1979	none	Some documents in M. V. Cook's and J. Edwards' files
*Association of Wall and Ceiling Contractors Industries International	1980-present	none	
American Society of Safety Engineers	exact dates unknown	unknown	none
American Industrial Hygienists Association	exact dates unknown	unknown	none

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY</u>
Employing Plasterers Association (Associate Member)	present	unknown	none
Metal Lath Association	1950's-1964	unknown	none
Pulp and Paper Institute	1950's-1964	unknown	none
Hardboard Association	1950's-1964	unknown	none
Health and Safety Council of Asbestos Cement Products Association	1967?-1971?	G. R. Krug - 11/19/68 C. P. Kipp (deceased) or L. A. Tobey (deceased) 2/17/70; 2/18/70; 3/19/70; 5/19/70; 11/19/70	November 21, 1968 memo from Krug to Kipp re: meeting and various minutes from other meetings.
Asbestos Information Association of North America Unknown if a member.	not a member	none	none
National Bureau of Standards	not a member	1978 - J. D. Cornell, K. S. Freeman (retired) Rockville, MD, jointly sponsored by NBS and NIOSH re: Asbestos and Health	none
American Standards Association (never a member; served on committees) became ANSI - 1969 similar to ASTM (sustaining member)	unknown; involvement at least 15 years ago	unknown	

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY</u>
Asbestos Textile Institute	never a member	none	
SOEH/IOEH	never a member	"Occupational Exposures to Fibrous and Particulate Dust and Their Extensions into the Environment" 12/5/77 - 12/7/77 J. D. Cornell (others?)	none

*Membership information pertaining to these organizations is not available in this defendant's files.

United States Gypsum Company does not and has not belonged to:

Quebec Asbestos Mining Association - QAMA

Asbestos Research Council of England

Public Health Bulletin Service

Plastering and Lath Association

Chicago Plastering Institute

Perlite Institute

Exhibit 2

THIS DEFENDANT IS INSURED BY THE FOLLOWING.

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
ADMIRAL	ADUX 0006	Excess	8/1/80- 8/1/81
ADMIRAL	A1UX 0051	Excess	8/1/81- 8/1/82
ADMIRAL	A2UX 0126	Excess	8/1/82- 8/1/83
ADMIRAL	A3UX 0164	Excess	8/1/83- 1/19/84
AMERICAN EXCESS	EUL5002664	Excess	11/10/78- 8/1/79
AMERICAN EXCESS	EUL5003994	Excess	8/1/79- 8/1/80
AMERICAN EXCESS	EUL5084144	Excess	8/1/80- 8/1/81
AMERICAN EXCESS	EUL5084262	Excess	8/1/81- 8/1/82
AMERICAN MUTUAL	57559-D	Primary	2/1/63- 2/1/66
AMERICAN MUTUAL	952989- 02-6-D	Primary	2/1/66- 2/1/67
AMERICAN MUTUAL	952989- 12-7-D	Primary	2/1/67- 2/1/70
AMERICAN MUTUAL	952989- 12-0-D	Primary	2/1/70- 4/15/71
AMICO	1YM 114 700	Primary	4/1/61- 2/1/63
AMICO	12M 127 724	Primary	4/15/71- 7/1/75
AMICO	2CP 61 063	Excess	2/15/72- 2/15/75
AMICO	2YM 129 182	Excess	2/15/72- 2/1/75
AMICO	5SB 021 428	Excess	2/15/75- 7/1/75
AMICO	5SB 021 429	Excess	2/15/75-7/1/75
AMERICAN RE-INSURANCE	M 12016-2001	Excess	12/7/66- 2/1/69
AMERICAN RE-INSURANCE	M1440073	Excess	11/8/76- 2/15/78
CALIFORNIA UNION	ZCX 00 33 78	Excess	11/7/78- 8/1/80

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
CONTINENTAL CASUALTY	RDX 9658052	Excess	7/31/62- 2/1/66
CONTINENTAL CASUALTY	RDX 938 50 86	Excess	4/20/66- 2/1/69
CONTINENTAL CASUALTY	RDX 923 01 25	Excess	12/7/66- 2/1/69
CONTINENTAL CASUALTY	RDX 01 912 52 99	Excess	2/1/69- 2/1/72
CONTINENTAL CASUALTY	RDX 01 912 53 00	Excess	2/1/69- 2/1/72
CONTINENTAL CASUALTY	RDX 01 808 54 80	Excess	2/1/72- 2/15/75
CONTINENTAL CASUALTY	RDX 01 808 54 81	Excess	2/1/72- 2/15/75
CONTINENTAL CASUALTY	RDX 142 11 13	Excess	2/15/75- 9/6/76
CONTINENTAL CASUALTY	RDX 142 11 14	Excess	2/15/75- 9/6/76
CONTINENTAL CASUALTY	CCP 005 30 96 37	Primary	8/1/79- 8/1/82
			(8/1/79- 8/1/80)
			(8/1/80- 8/1/82)
COMMERCIAL UNION (EMPLOYERS' LIABILITY ASSURANCE CORPORATION, LTD.)	E22-8160-001	Excess	2/1/63- 2/1/66
FIREMAN'S FUND	XL 38021	Excess	2/1/69- 2/1/72
FIREMAN'S FUND	XLX 119 50 62	Excess	2/1/72- 2/1/75
FIRST STATE	920501	Excess	2/15/72- 2/1/75
FIRST STATE	928140	Excess	8/1/80- 8/1/81
FIRST STATE	928110	Excess	8/1/81- 8/1/82
FIRST STATE	928123	Excess	8/1/82- 8/1/84
INTEGRITY	XL-50- 04-06	Excess	8/1/83- 8/1/84

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
INTERNATIONAL	522 003150 9	Excess	10/25/78- 8/1/79
INTERNATIONAL	522 003173 4	Excess	8/1/79- 8/1/80
INTERSTATE	155-U-29045	Excess	11/9/78 8/1/79
INTERSTATE	155-U-29098	Excess	8/1/79- 8/1/80
LEXINGTON	5521014	Excess	8/1/80- 8/1/81
LEXINGTON	5521015	Excess	8/1/80- 8/1/81
LEXINGTON	5521110	Excess	8/1/81- 8/1/82
LEXINGTON	5521201	Excess	8/1/82- 8/1/83
LEXINGTON	5525721	Excess	8/1/83- 8/1/84
LIBERTY MUTUAL	CGL-04-00610	Primary	4/1/43- 4/1/44
LIBERTY MUTUAL	CGL-04-01419	Primary	4/1/44- 4/1/45
LIBERTY MUTUAL	CGL-04-02297	Primary	4/1/45- 4/1/46
LIBERTY MUTUAL	CGL-04-03180	Primary	4/1/46- 4/1/47
LIBERTY MUTUAL	CGL-04-04185	Primary	4/1/47- 4/1/48
LIBERTY MUTUAL	CGL-04-05766	Primary	4/1/48- 4/1/49
LIBERTY MUTUAL	CGL-04-00244	Primary	4/1/49- 6/1/49
LLOYD'S	24045	Primary	6/1/49- 12/8/49
LLOYD'S	21270/ 24045	Excess	12/8/49- 7/10/50
LLOYD'S	21271/ 24045	Excess	12/8/49- 7/10/50
LLOYD'S	C 31979 C	Primary	7/10/50- 3/10/52

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
LLOYD'S	23331	Excess	7/10/50- 7/10/53
LLOYD'S	F 23376	Excess	7/10/50- 7/10/53
LLOYD'S	F 23377	Excess	7/10/50- 7/10/53
LLOYD'S	C 36693 CB	Primary	3/10/52- 4/1/55
LLOYD'S	F 35836	Excess	7/10/53- 4/1/55
LLOYD'S	F 35835	Excess	7/10/53- 4/1/55
LLOYD'S	MO 642295 CB	Primary	4/1/55- 4/1/58
LLOYD'S	NJ 642296 CB	Excess	4/1/55- 4/1/58
LLOYD'S	WMJ 801108 CB/ WMJ 801109 CB	Excess	4/1/55- 4/1/58
LLOYD'S	WMJ 801110 CB	Excess	4/1/55- 4/1/58
LLOYD'S	RS 907609 CD	Primary	4/1/58- 4/1/61
LLOYD'S	NS 653920 CD	Excess	4/1/58- 4/1/61
LLOYD'S	55043	Excess	4/1/58- 4/1/61
LLOYD'S	55044	Excess	4/1/58- 4/1/61
LLOYD'S	55045	Excess	4/1/58- 4/1/61
LLOYD'S	55046	Excess	4/1/58- 4/1/61
LLOYD'S	WNY807004	Excess	7/31/59- 7/31/62
LLOYD'S	022463000	Excess	2/1/66- 2/1/69
LLOYD'S	022464000	Excess	2/1/66- 2/1/69

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
LLOYD'S	022747000	Excess	12/7/66- 2/1/69
LLOYD'S	026160000	Excess	3/1/69- 2/1/72
LLOYD'S	026161000	Excess	3/1/69- 2/1/72
LLOYD'S	026162000	Excess	3/1/69- 2/1/72
LLOYD'S	183550900	Excess	11/19/76- 2/15/78
LLOYD'S	020044100	Excess	2/15/78- 8/1/79
MIDLAND	XL 146163	Excess	2/15/75- 2/15/78
NATIONAL AMERICAN (STUYVESANT)	61-05-1800E	Excess	4/1/61- 2/1/63
NATIONAL SURETY	XLX-120 48 58	Excess	2/15/75- 2/15/78
NATIONAL SURETY	XLX-130 14 53	Excess	10/25/78- 8/1/79
NATIONAL SURETY	XLX-136 63 54	Excess	8/1/79- 8/1/80
NATIONAL SURETY	XLX-143 62 90	Excess	8/1/80- 8/1/81
NATIONAL SURETY	XLX-143 63 42	Excess	8/1/81- 8/1/82
NATIONAL SURETY	XLX-148 34 45	Excess	8/1/82- 8/1/83
NATIONAL SURETY	XLX-153 01 72	Excess	8/1/83- 1/19/84
NATIONAL SURETY	XLX-153 01 73	Excess	1/19/84- 8/1/84
NORTHBROOK	63 001 083	Excess	8/1/83- 8/1/84
			7/1/75- 2/15/78

<u>CARRIER</u>	<u>CERTIFICATE OR POLICY NO.</u>	<u>TYPE</u>	<u>POLICY PERIOD</u>
NORTHBROOK	63 001 167	Excess	7/1/75- 2/15/78
NORTHBROOK	63 004 250	Excess	2/15/78- 8/1/79
NORTHBROOK	63 005 941	Excess	8/1/79- 8/1/80
NORTHBROOK	63 005 942	Excess	8/1/79- 8/1/80
TRANSIT	UMB 950-106	Excess	8/1/80- 8/1/81
TRANSIT	UMB 950-181	Excess	8/1/81- 8/1/82
TRANSIT	UMB 950-248	Excess	8/1/82- 12/31/84
TRAVELERS	TR-NSL- 135T059-4-75	Primary	7/1/75- 7/1/78 (7/1/75- 2/15/78) (2/15/78- 7/1/78)
TRAVELERS	TR-NSL- 135T060-1-75	Primary	7/1/75- 8/1/79
TRAVELERS	TRK-SLG- 135T059-4-78	Primary	7/1/78- 8/1/79
Self-Insured Retention (NORTHWESTERN NATIONAL INSURANCE COMPANY)	CLA 3259137	Primary	8/1/82- 1/1/85

WP/15177

5, B3, C1, C9, D7.

United States Gypsum Company
Asbestos Litigation Document Repository
Indices of General Document Collection and Bulk Document Collection
Table of Contents

<u>SECTION</u>	<u>CATEGORY</u>	<u>DESCRIPTION</u>	<u>NO. OF PAGES</u>
General Document Collection			
1	Abatement-Policy	Correspondence and summaries of Company policy regarding asbestos abatement at Company locations. Documents are filed in numerical order.	2
2	Abatement-Plant	Correspondence describing and/or discussing asbestos abatement activities at plant locations. Documents are filed in alphabetical order by plant. Within each folder documents are in numerical order.	9
3	Acquisition and Divestiture	Documents concerning acquisitions/divestitures of businesses that produced and sold asbestos containing products. Documents are filed in numerical order.	1
4	Advertising - Product Literature	Advertising and promotional material pertaining to the Company's asbestos containing products. Documents are organized by the 13 asbestos containing product groups with the 14th category being multiple products. Documents are filed in numerical order.	18
5	AIA	Technical descriptions of Company's asbestos containing products. Generally referenced by architects. Documents are organized the same as Advertising Product Literature. Documents are filed in numerical order.	13
6	Sweets	Technical descriptions of the Company's asbestos containing products which were submitted for publication by Sweets' Catalog. Documents are organized the same as Advertising Product Literature. Documents are filed in numerical order.	15
7	Non-Asbestos Products	AIA, Sweets and Advertising-Product literature pertaining to non-asbestos containing Company	14

products. Documents are organized by magazine type and all other. Documents are filed in numerical order.

8	Board of Directors	Various materials relating to Board activities. Documents are filed in numerical order.	1
9	Capital Authorities -Authority Files	Capital expenditures file materials which discuss asbestos. Documents are filed in numerical order.	1
10	Capital Authorities -Misc. Corres.	Other materials concerning Company capital expenditures. Documents are filed in numerical order.	1
11	Card Catalogs -Research Library	Complete Libertyville Research Center Card Catalog as of April 1987. Documents are filed in numerical order.	1
12	Card Catalogs -Corporate Library	Complete USG Corp. Library Card Catalog from the 101 Building as of January 14, 1988. Documents are filed in numerical order.	1
13	Contracts and Agreements	Documents pertaining to contracts and agreements entered into by the Company. Documents are filed in numerical order.	13
14	Corporate Minutes	Board minutes. Documents are filed in numerical order.	1
15	Customer Inquiries -Policy/Way to Respond	Documents describing Company procedures when replying to an inquiry about one of its products. Documents are filed in numerical order.	1
16	Customer Inquiries -Correspondence	Customer inquiries and replies. Documents are filed in numerical order.	24
17	Customer Inquiries -Complaints	Correspondence and reports describing a complaint about a product. Documents are filed in numerical order.	4

18	Demand Letters	Demands that the Company remove asbestos containing products from buildings owned by the writer or the party represented by the writer. Documents are filed in numerical order.	1
19	Documents Collected from Sources Outside of the Company	Material not found in the business records of US Gypsum Company. These materials were received by attorneys for US Gypsum from third parties in connection with the defense of US Gypsum in litigation. Documents are filed in numerical order.	3
20	Documents Pertaining to Other Companies	Documents which pertain to or were written by other Companies includes advertisements. Documents are filed in numerical order.	3
21	Studies by Dr. Gardner	Materials relating to studies performed by Dr. Gardner of Saranac Labs. Documents are filed in numerical order.	1
22	Encapsulation	Documents discussing or describing encapsulation and related activities. Documents are filed in numerical order.	2
23	Financial Related Information -Annual Rpts	United States Gypsum Company Annual Reports. Documents are filed by year from 1920-1986.	1
24	Financial Related -Miscellaneous	Various information concerning plant costs, project analyses and annual reports of other Companies. Documents are filed in numerical order.	2
25	Insurance -Policies	Insurance policies. Documents are filed in numerical order by policy.	1
26	Insurance -Misc. Corres.	Various documents discussing insurance related matters. Documents are filed in numerical order.	2

27	Insurance -Dept. Dead Storage	Stored insurance department inactive file materials. Documents are filed in numerical order.	2
28	Material Safety Data Sheets	Description of certain product components. Documents are filed in numerical order.	1
29	Medical Related Rpts and Corres.	Documents concerning chest x-rays, personnel records and related information. Documents are filed in numerical order.	6
30	NATLSCO	Industrial Hygiene Studies performed by the National Loss Control Service Corporation at Company plant facilities. Documents are filed in numerical order.	2
31	Non-Product Operating Bulletins	Administrative and operating bulletins not related to the manufacture of the Company's products. See index for further delineation. Documents are filed in numerical order.	2
32	Outside Meetings and Seminars-Corres.	Material referencing meetings and seminars conducted outside of the Company. Documents are filed in numerical order.	1
33	OSHA -Violations	Documents describing violations cited by OSHA. Documents are filed in chronological order.	1
34	OSHA -Rpts. and Corres.	Other material relating to OSHA and its activities. Documents are filed in chronological order.	1
35	Organization Charts	A collection of Company organization charts and various personnel listings. Documents are filed in numerical order.	1
36	Packaging, Labeling and Warning	Documents discussing product packaging, labeling and warnings and materials on employee warnings. Documents are filed in chronological order.	2
37	Patent and Trademark	Materials concerning Company patents and trademarks for asbestos containing products. Documents are filed in numerical order.	1

38	Product Information- General	Documents describing or discussing Company products or issues affecting those products. Documents are filed in numerical order.	12
39	Product Operating Bulletins	A collection of the Company's Product Operating Bulletins relating to the manufacture of asbestos containing products. See index for further delineation. Documents are filed in numerical order.	3
40	Plt. Related Corres. and Reports	Materials concerning plant activities or referencing Company plants. Documents are filed in numerical order.	3
41	Published Documents	Published documents and materials relating to such documents. Documents are filed in numerical order.	11
42	Purchase Related Rec. and Corres.	Materials relating to Company purchasing activities. Documents are filed in numerical order.	3
43	Research Lab Notebook Index	An index of the Libertyville Research Center Laboratory Notebooks as of April 1987. Documents are filed in numerical order.	2
44	Research Lab Notebooks	Excerpts from Research Lab Notebooks previously selected by plaintiff counsel. Documents are filed in numerical order.	1
45	Research Reports -Thesaurus	Listing of Key Words contained in Research Report Information Retrieval System. Documents are filed in numerical order.	1
46	Research Reports -Key Word Searches	Information Retrieval System printouts listing Research Reports identified by certain Key Words. Documents are filed in keyword order.	8
47	Research Reports -Reports	Hardcopy Research Reports identified by certain Key Word Searches and other Research Reports. Documents are filed by Research Report number.	534
48	Research Related Docs. -Dead Storage: Roofing, Siding and Insulation	Stored inactive files concerning Company Roofing, Siding and Insulation Products. Documents are filed in numerical order.	3

49	Research Related Docs. -Miscellaneous	Materials relating to research activities. Documents are filed in numerical order.	23
50	Retirement Disabil. and Deceased	Documents pertaining to retired, disabled or deceased Company employees who alleged they had a lung related disability, whether or not there is an allegation that the employee contracted any disease by reason of exposure to asbestos. Documents are filed in numerical order.	2
51	Sales Records Data	Information on Company sales of asbestos containing products. (Sales Statistics for the years 1965 through 1976 by state are also separately available.) Documents are filed in numerical order.	1
52	SBA Minutes	Minutes from Safe Building Alliance meetings through May, 1987. Documents are filed in numerical order.	1
53	Stored Files From Outside Law Firm	Documents collected from the files of Keck, Mahin and Cate. Documents are filed in numerical order.	7
54	Testing -Fiber Release	Testing and studies on asbestos fiber release and friability. Documents are filed in chronological order.	1
55	Testing -Dust Surveys/Air Monitoring	Testing and studies concerning conditions and atmosphere at Company facilities. Documents are filed in chronological order.	15
56	Testing -Other	Documents relating to plant product trials, sample analysis and a variety of testing. Documents are filed in chronological order.	10
57	Trade Assoc and Organizations	Information written by or describing various trade associations and organizations. Documents are filed in numerical order.	2
58	Underwriters Laboratories	Correspondence and reports pertaining to Underwriters Laboratories. Document are filed in numerical order.	1
59	Wiss, Janney, Elstner Associates, Inc.	Documents from the files of Wiss, Janney, Elstner Associates, Inc. Documents are filed in numerical order.	4
60	Worker's Comp Claim	Asbestos related workers compensation claim petitions or other documents giving notice of such a claim by	

Company employees. Document are filed in numerical order.

61	101 Bldg. Oper./ Maint.	Materials concerning the 101 S. Wacker Building Documents are filed in numerical order.	1
62	Miscellaneous Documents	All other material that was not assigned to any of the aforementioned categories. Documents are filed in numerical order.	5

Bulk Document Collection

63	Bulk	Various materials produced in bulk.	1
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