

FILE NAME: US Gypsum (USG)

DATE: April 23, 1984

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DOCUMENT DESCRIPTION: 1984 Legal - Special Interrogatory to Defendant  
USG

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

GREENVILLE COUNTY SCHOOL DISTRICT, )

Plaintiff, )

vs. )

UNITED STATES GYPSUM COMPANY, )  
W. R. GRACE COMPANY, NATIONAL )  
GYPSUM COMPANY, PROKO INDUSTRIES, )  
INC., UNION CARBIDE CORPORATION, )  
and CAREY-CANADA, INC., )

Defendants. )

SPECIAL INTERROGATORY TO  
DEFENDANT UNITED STATES  
GYPSUM COMPANY

C/A NO. 82-3142-14

TO: THE DEFENDANT, UNITED STATES GYPSUM COMPANY AND ITS  
ATTORNEY, FRANK R. ELLERBE, III, ESQUIRE:

YOU WILL PLEASE TAKE NOTICE that pursuant to the  
Federal Rules of Civil Procedure you are hereby directed to file  
Answers to the following Interrogatories within thirty (30) days  
of service hereof unless further extension is granted by the  
Court. These Interrogatories shall be deemed continuing so as  
to require supplemental answers a reasonable time prior to trial  
if additional information with respect to these Interrogatories  
is obtained by you or your counsel.

In regard to your response to "Notice" Interrogatory  
question posed by the Honorable William W. Wilkins, dated February  
15, 1983, state the following with respect to each document  
listed therein:

- (a) The name of the person who located the document;
- (b) The date the document was first located;
- (c) The precise location of the document when it was  
located;

*Plf's*  
CIP. EX. NO. 13  
FOR ID. AS OF 7-29-86

CERTIFICATE OF MAILING

This is to certify that I, Antoinette C. Martin, employee of the firm of Robinson, McFadden, Moore, Pope, Williams, Taylor, & Brailsford, P.A., have this date served Daniel A. Speights, attorney for the plaintiff in the foregoing matter with Defendant United States Gypsum Company's Response to Special Interrogatory Proposed by Plaintiff by placing a copy of same in the United States mail with adequate postage thereon, addressed as follows:

Daniel A. Speights, Esquire  
P. O. Box 621  
Hampton, SC 29924

Dated at Columbia, South Carolina this 23rd day of April, 1984.

By Antoinette C. Martin

cc: (w/encl.): F. Barron Grier, Esq.  
Glenn Bowers, Esq.  
P. Michael Duffy, Esq.  
Robert R. Carpenter, Esq.  
Donald A. Cockrill, Esq.  
Suzanne K. Torrey, Esq.