

JAMES GRADY OVERSTREET § IN THE DISTRICT COURT OF
CLEOPHAS PARNELL and DOROTHY §
PARNELL; TESSEL TAYLOR §
JONES, SR., JAMES DEMPSY §
MAYO and HAZLE MAYO; and §
SAM PETTAWAY and MINNIE § DALLAS COUNTY, TEXAS
LEE PETTAWAY §
§
§
VS. §
§
FIBREBOARD CORPORATION, ET AL § 134TH JUDICIAL DISTRICT

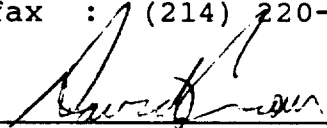
DEFENDANT U.S. GYPSUM COMPANY'S ANSWERS TO
PLAINTIFFS' INTERROGATORIES

TO: Plaintiffs, JAMES GRADY OVERSTREET, ET AL, by and through
their attorney of record, RUSSELL W. BUDD, Baron & Budd,
3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

COMES NOW, U .S. GYPSUM COMPANY, Defendant in the above-
entitled and numbered cause, and files the attached Answers to
Plaintiffs' Interrogatories.

Respectfully submitted,

DeHAY & BLANCHARD
Plaza of the Americas
600 North Pearl Street
2500 South Tower, LB 201
Dallas, TX 75201-2880
Telephone: (214) 953-1313
Telefax : (214) 220-0439

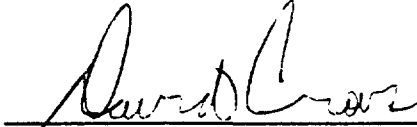
By: 
GARY D. ELLISTON
State Bar No. 06584700
DAVID W. CROWE
State Bar No. 05164250

COUNSEL FOR DEFENDANT
U.S. 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, 8333 Douglas Avenue, 10th Floor, Dallas, Texas 75225, by hand delivery, on this the 3 day of DEC, 1991.



DAVID W. CROWE

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, U.S. Gypsum hereby offers to make available these documents at a mutually convenient time at its offices at 101 S. Wacker Drive, Chicago, Illinois.

In giving its responses to Interrogatories and Requests 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 that 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 "its subsidiaries and predecessors in interest, its present and former officers, executives, directors, agents, employees and all other persons acting or purporting to act on behalf of U. S. Gypsum Company," and "any current or former subsidiaries of U. S. Gypsum

Company, or any corporate predecessors of U. S. Gypsum Company, or its current or former subsidiaries, including but not limited to U. S. Gypsum Company". 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 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.

Finally, U.S. Gypsum objects to these Interrogatories and Requests 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 in infra, U.S. Gypsum will produce documents where are the proper subjects of an appropriate document request.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

For each document listed below, please answer whether such document is a true and correct duplicate of a genuine and authentic document:

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
(a) USG 22	1932 Transactions - National Safety Council
(b) USG 23	1933 Transactions - National Safety Council
(c) USG 180	7/31/36 report of Dust Survey at National Asbestos Company plant at Jersey City, NJ
(d) USG 7	Letter 8/17/36 T. R. Parrish to Scott, MacLeish and Falk
(e) USG 11	Memorandum of Agreement 11/20/36 re Experiments by Gardner at Saranac
(f) USG 2	Letter 2/27/37 Brown to Simpson
(g) USG 181	Letter 5/5/37 J. S. Offutt to G. D. King
(h) USG 44	Letter 5/11/37 Vandiver Brown to J. S. Offutt, enclosing Dr. Gardner's first report dated 5/5/37
(i) USG 200	Letter 9/16/37 Scharwath to Barrett
(j) USG 3	Letter 9/29/37 Assistant to President, U. S. Gypsum Company to J. A. Scharwath
(k) USG 4	Letter 9/29/37 J. S. Offutt to Scott, MacLeish and Falk

- (l) USG 5 Letter 10/8/37 John J. Cuneo to Charles M. Price
- (m) USG 6 Letter 10/28/37 Charles M. Price to John J. Cuneo
- (n) USG 187 Report January 1938 from J.S.O., "Dust and Its Relation to Our Operations"
- (o) USG 202 Letter 10/28/46 Muehleck to Brown
- (p) USG 49 9/3/48 Operating Division Information Bulletin No. 602
- (q) USG 203 Telegram 11/10/48 J. W. Butler to Vandiver Brown
- (r) USG 204 Letter 11/12/48 Brown to Butler
- (s) USG 206 Letter 3/3/49 Vandiver Brown to American Brake Block, et al
- (t) USG 51 Letter 5/3/49 Butler to Vorwald
- (u) USG 52 Letter 6/8/50 Ben G. Miriello to United States Gypsum Company
- (v) USG 53 Letter 12/27/50 Operations Manager, United States Gypsum to Miriello
- (w) USG 214 Death Certificate of Raffaele (Ralph) Miriello issued by Office of Registrar of Vital Statistics of Hudson County, Jersey City, New Jersey
- (x) USG 55 Letter 11/16/53 C. P. Kipp to Department of Mines, Quebec

- (y) USG 56 Letter 11/25/53 Poitevin, Canadian Mines Bureau, to Kipp
- (z) USG 57 2/11/54 Operating Division General Order - Elimination of Dusty Conditions
- (aa) USG 69 7/24/64 Operating Division General Order - Personnel Safety and Health
- (bb) USG 35 Letter 7/9/65 Kipp to Brown
- (cc) USG 76 9/19/67 Gypsum Association Minutes of the Safety Committee Meeting
- (dd) USG 88 Excerpt from Sweet's Catalog, 1968 SprayDon
- (ee) USG 82 Memo 10/10/68 Kirkland to Rockett
- (ff) USG 83 Letter 10/17/68 Kempthorne to Setterberg
- (gg) USG 84 Memo 11/21/68 Krug to Kipp
- (hh) USG 86 Memo 12/27/68 Klassen to Diersen
- (ii) USG 87 Letter 12/27/68 D. M. Diersen to Richard Kempthorne
- (jj) USG 90 Letter 2/29/69 D. M. Diersen to Richard Kempthorne
- (kk) USG 92 Letter 4/15/69 Richard Kempthorne to D. M. Diersen
- (ll) USG 95 Letter 5/16/69 D. M. Diersen to Richard Kempthorne

(mm) USG 97 Bulletin - Labeling, 5/29/69

(nn) USG 101 Memo 10/17/69 Klassen to Steeves, Setterberg
and Ebbinghouse

(oo) USG 102 Memo 11/25/69 CCT to Diersen

(pp) USG 103 12/23/69 Operating Division General Order -
Personnel Safety and Health Medical

(qq) USG 107 Memo 3/12/70 C. P. Kipp to W. J. Brown, G. R.
Krug and M. Schmidt attaching three memos
3/11/70 from Kipp

(rr) USG 110 Memo 6/11/70 Atwood to Thiel

(ss) USG 111 Memo 6/30/70 C. C. Thiel to C. J. Atwood

(tt) USG 213 Letter dated July 1, 1970 to Wendell J. Brown
from C. P. Kipp

(uu) USG 112 Memo 7/2/70 Kipp to Hogan

(vv) USG 113 R & D Technical Request 8/20/70 Howard to Walker

(ww) USG 115 Memo 12/2/70 L. A. Tobey to P. Kipp

(xx) USG 116 Letter 8/25/71 Bradley Walls to Principals and
Representatives of Health & Safety Council /
ACPA

(yy) USG 125 Memo 6/2/72 Roger Gillette to D. S. McVicker

(zz) USG 126 Memo 6/14/72 C. P. Kipp to A. J. Watt, Dr. J.
Zabor, A. R. Rump and C. C. Gramer

- (aaa) USG 127 Memo 7/7/72 W. W. Holloway to A. R. Rump
- (bbb) USG 130 11/6/72 Research report
- (ccc) USG 134 3/9/73 Research Report
- (ddd) USG 138 "Industrial Hygiene Survey for U. S. Gypsum Company, Gypsum, Ohio, NATLSCO", 6/26/73, Michael L. Brown
- (eee) USG 137 Letter 7/31/73 Selikoff to Ehrmann
- (fff) USG 139 Memo 8/17/73 K. S. Freeman to J. N. Walker
- (ggg) USG 142 "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Treatment Compounds," Robert D. Soule, 11/19/73
- (hhh) USG 149 Letter 10/24/75 Freeman to Dr. Harrington
- (iii) USG 189 Memo 3/24/82 Torrey to Snell

ANSWER

Objection. This defendant objects to this Interrogatory on the basis that it constitutes an improper form of discovery in that plaintiff in effect is submitting a disguised request for admission. Without waiving this objection, see attached Exhibit 1.

INTERROGATORY NO. 2:

For each document listed below, please answer whether such document was kept and/or generated in the regular course of a regularly conducted business activity of any U.S. Gypsum Entity by an employee or representative of any U.S. Gypsum Entity with knowledge of the act, event, condition or opinion recorded.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
(a) USG 22	1932 Transactions - National Safety Council
(b) USG 23	1933 Transactions - National Safety Council
(c) USG 180	7/31/36 report of Dust Survey at National Asbestos Company plant at Jersey City, NJ
(d) USG 7	Letter 8/17/36 T. R. Parrish to Scott, MacLeish and Falk
(e) USG 11	Memorandum of Agreement 11/20/36 re Experiments by Gardner at Saranac
(f) USG 2	Letter 2/27/37 Brown to Simpson
(g) USG 181	Letter 5/5/37 J. S. Offutt to G. D. King
(h) USG 44	Letter 5/11/37 Vandiver Brown to J. S. Offutt, enclosing Dr. Gardner's first report dated 5/5/37
(i) USG 200	Letter 9/16/37 Scharwath to Barrett
(j) USG 3	Letter 9/29/37 Assistant to President, U. S. Gypsum Company to J. A. Scharwath
(k) USG 4	Letter 9/29/37 J. S. Offutt to Scott, MacLeish and Falk

- (l) USG 5 Letter 10/8/37 John J. Cuneo to Charles M. Price
- (m) USG 6 Letter 10/28/37 Charles M. Price to John J. Cuneo
- (n) USG 187 Report January 1938 from J.S.O., "Dust and Its Relation to Our Operations"
- (o) USG 202 Letter 10/28/46 Muehleck to Brown
- (p) USG 49 9/3/48 Operating Division Information Bulletin No. 602
- (q) USG 203 Telegram 11/10/48 J. W. Butler to Vandiver Brown
- (r) USG 204 Letter 11/12/48 Brown to Butler
- (s) USG 206 Letter 3/3/49 Vandiver Brown to American Brake Block, et al
- (t) USG 51 Letter 5/3/49 Butler to Vorwald
- (u) USG 52 Letter 6/8/50 Ben G. Miriello to United States Gypsum Company
- (v) USG 53 Letter 12/27/50 Operations Manager, United States Gypsum to Miriello
- (w) USG 214 Death Certificate of Raffaele (Ralph) Miriello issued by Office of Registrar of Vital Statistics of Hudson County, Jersey City, New Jersey
- (x) USG 55 Letter 11/16/53 C. P. Kipp to Department of Mines, Quebec

(y) USG 56 Letter 11/25/53 Poitevin, Canadian Mines Bureau,
to Kipp

(z) USG 57 2/11/54 Operating Division General Order -
Elimination of Dusty Conditions

(aa) USG 69 7/24/64 Operating Division General Order -
Personnel Safety and Health

(bb) USG 35 Letter 7/9/65 Kipp to Brown

(cc) USG 76 9/19/67 Gypsum Association Minutes of the Safety
Committee Meeting

(dd) USG 88 Excerpt from Sweet's Catalog, 1968 SprayDon

(ee) USG 82 Memo 10/10/68 Kirkland to Rockett

(ff) USG 83 Letter 10/17/68 Kempthorne to Setterberg

(gg) USG 84 Memo 11/21/68 Krug to Kipp

(hh) USG 86 Memo 12/27/68 Klassen to Diersen

(ii) USG 87 Letter 12/27/68 D. M. Diersen to Richard
Kempthorne

(jj) USG 90 Letter 2/29/69 D. M. Diersen to Richard
Kempthorne

(kk) USG 92 Letter 4/15/69 Richard Kempthorne to D. M.
Diersen

(ll) USG 95 Letter 5/16/69 D. M. Diersen to Richard Kempthorne

(mm) USG 97 Bulletin - Labeling, 5/29/69

(nn) USG 101 Memo 10/17/69 Klassen to Steeves, Setterberg and Ebbinghouse

(oo) USG 102 Memo 11/25/69 CCT to Diersen

(pp) USG 103 12/23/69 Operating Division General Order - Personnel Safety and Health Medical

(qq) USG 107 Memo 3/12/70 C. P. Kipp to W. J. Brown, G. R. Krug and M. Schmidt attaching three memos 3/11/70 from Kipp

(rr) USG 110 Memo 6/11/70 Atwood to Thiel

(ss) USG 111 Memo 6/30/70 C. C. Thiel to C. J. Atwood

(tt) USG 213 Letter dated July 1, 1970 to Wendell J. Brown from C. P. Kipp

(uu) USG 112 Memo 7/2/70 Kipp to Hogan

(vv) USG 113 R & D Technical Request 8/20/70 Howard to Walker

(ww) USG 115 Memo 12/2/70 L. A. Tobey to P. Kipp

(xx) USG 116 Letter 8/25/71 Bradley Walls to Principals and Representatives of Health & Safety Council / ACPA

(yy) USG 125 Memo 6/2/72 Roger Gillette to D. S. McVicker

(zz) USG 126 Memo 6/14/72 C. P. Kipp to A. J. Watt, Dr. J. Zabor, A. R. Rump and C. C. Gramer

(aaa) USG 127 Memo 7/7/72 W. W. Holloway to A. R. Rump

(bbb) USG 130 11/6/72 Research report

(ccc) USG 134 3/9/73 Research Report

(ddd) USG 138 "Industrial Hygiene Survey for U. S. Gypsum Company, Gypsum, Ohio, NATLSCO", 6/26/73, Michael L. Brown

(eee) USG 137 Letter 7/31/73 Selikoff to Ehrmann

(fff) USG 139 Memo 8/17/73 K. S. Freeman to J. N. Walker

(ggg) USG 142 "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Treatment Compounds," Robert D. Soule, 11/19/73

(hhh) USG 149 Letter 10/24/75 Freeman to Dr. Harrington

(iii) USG 189 Memo 3/24/82 Torrey to Snell

ANSWER:

Objection. This defendant objects to this Interrogatory on the basis that it constitutes an improper form of discovery in that plaintiff in effect is submitting a disguised request for admission. Without waiving this objection, see attached Exhibit 1.

INTERROGATORY NO. 3:

For each document listed below, please answer whether such document was found in your files in such a condition as to create no suspicion concerning its authenticity.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
(a) USG 22	1932 Transactions - National Safety Council
(b) USG 23	1933 Transactions - National Safety Council
(c) USG 180	7/31/36 report of Dust Survey at National Asbestos Company plant at Jersey City, NJ
(d) USG 7	Letter 8/17/36 T. R. Parrish to Scott, MacLeish and Falk
(e) USG 11	Memorandum of Agreement 11/20/36 re Experiments by Gardner at Saranac
(f) USG 2	Letter 2/27/37 Brown to Simpson
(g) USG 181	Letter 5/5/37 J. S. Offutt to G. D. King
(h) USG 44	Letter 5/11/37 Vandiver Brown to J. S. Offutt, enclosing Dr. Gardner's first report dated 5/5/37
(i) USG 200	Letter 9/16/37 Scharwath to Barrett
(j) USG 3	Letter 9/29/37 Assistant to President, U. S. Gypsum Company to J. A. Scharwath
(k) USG 4	Letter 9/29/37 J. S. Offutt to Scott, MacLeish and Falk
(l) USG 5	Letter 10/8/37 John J. Cuneo to Charles M. Price

- (m) USG 6 Letter 10/28/37 Charles M. Price to John J. Cuneo
- (n) USG 187 Report January 1938 from J.S.O., "Dust and Its Relation to Our Operations"
- (o) USG 202 Letter 10/28/46 Muehleck to Brown
- (p) USG 49 9/3/48 Operating Division Information Bulletin No. 602
- (q) USG 203 Telegram 11/10/48 J. W. Butler to Vandiver Brown
- (r) USG 204 Letter 11/12/48 Brown to Butler
- (s) USG 206 Letter 3/3/49 Vandiver Brown to American Brake Block, et al
- (t) USG 51 Letter 5/3/49 Butler to Vorwald
- (u) USG 52 Letter 6/8/50 Ben G. Miriello to United States Gypsum Company
- (v) USG 53 Letter 12/27/50 Operations Manager, United States Gypsum to Miriello
- (w) USG 214 Death Certificate of Raffaele (Ralph) Miriello issued by Office of Registrar of Vital Statistics of Hudson County, Jersey City, New Jersey
- (x) USG 55 Letter 11/16/53 C. P. Kipp to Department of Mines, Quebec
- (y) USG 56 Letter 11/25/53 Poitevin, Canadian Mines Bureau, to Kipp

- (z) USG 57 2/11/54 Operating Division General Order -
Elimination of Dusty Conditions
- (aa) USG 69 7/24/64 Operating Division General Order -
Personnel Safety and Health
- (bb) USG 35 Letter 7/9/65 Kipp to Brown
- (cc) USG 76 9/19/67 Gypsum Association Minutes of the Safety
Committee Meeting
- (dd) USG 88 Excerpt from Sweet's Catalog, 1968 SprayDon
- (ee) USG 82 Memo 10/10/68 Kirkland to Rockett
- (ff) USG 83 Letter 10/17/68 Kempthorne to Setterberg
- (gg) USG 84 Memo 11/21/68 Krug to Kipp
- (hh) USG 86 Memo 12/27/68 Klassen to Diersen
- (ii) USG 87 Letter 12/27/68 D. M. Diersen to Richard
Kempthorne
- (jj) USG 90 Letter 2/29/69 D. M. Diersen to Richard
Kempthorne
- (kk) USG 92 Letter 4/15/69 Richard Kempthorne to D. M.
Diersen
- (ll) USG 95 Letter 5/16/69 D. M. Diersen to Richard
Kempthorne
- (mm) USG 97 Bulletin - Labeling, 5/29/69

(nn) USG 101 Memo 10/17/69 Klassen to Steeves, Setterberg and Ebbinghouse

(oo) USG 102 Memo 11/25/69 CCT to Diersen

(pp) USG 103 12/23/69 Operating Division General Order - Personnel Safety and Health Medical

(qq) USG 107 Memo 3/12/70 C. P. Kipp to W. J. Brown, G. R. Krug and M. Schmidt attaching three memos 3/11/70 from Kipp

(rr) USG 110 Memo 6/11/70 Atwood to Thiel

(ss) USG 111 Memo 6/30/70 C. C. Thiel to C. J. Atwood

(tt) USG 213 Letter dated July 1, 1970 to Wendell J. Brown from C. P. Kipp

(uu) USG 112 Memo 7/2/70 Kipp to Hogan

(vv) USG 113 R & D Technical Request 8/20/70 Howard to Walker

(ww) USG 115 Memo 12/2/70 L. A. Tobey to P. Kipp

(xx) USG 116 Letter 8/25/71 Bradley Walls to Principals and Representatives of Health & Safety Council / ACPA

(yy) USG 125 Memo 6/2/72 Roger Gillette to D. S. McVicker

(zz) USG 126 Memo 6/14/72 C. P. Kipp to A. J. Watt, Dr. J. Zabor, A. R. Rump and C. C. Gramer

(aaa) USG 127 Memo 7/7/72 W. W. Holloway to A. R. Rump

(bbb) USG 130 11/6/72 Research report

(ccc) USG 134 3/9/73 Research Report

(ddd) USG 138 "Industrial Hygiene Survey for U. S. Gypsum Company, Gypsum, Ohio, NATLSCO", 6/26/73, Michael L. Brown

(eee) USG 137 Letter 7/31/73 Selikoff to Ehrmann

(fff) USG 139 Memo 8/17/73 K. S. Freeman to J. N. Walker

(ggg) USG 142 "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Treatment Compounds," Robert D. Soule, 11/19/73

(hhh) USG 149 Letter 10/24/75 Freeman to Dr. Harrington

(iii) USG 189 Memo 3/24/82 Torrey to Snell

ANSWER:

Objection. This defendant objects to this Interrogatory on the basis that it constitutes an improper form of discovery in that plaintiff in effect is submitting a disguised request for admission. Without waiving this objection, see attached Exhibit 1.

INTERROGATORY NO. 4:

Has U.S. Gypsum stipulated or agreed to the authenticity of any of the documents referenced in Interrogatory No. 1 with any person prior to the date of these Interrogatories?

ANSWER:

Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, this defendant has responded to interrogatories similar to these in Stenzel, et al. v. Armstrong World Industries, Inc., et al. in the District Court of Dallas County, Texas 162nd Judicial District, No. 91-6526.

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

I, F. M. Poremski, declare:

I am the Manager, 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 corporation;

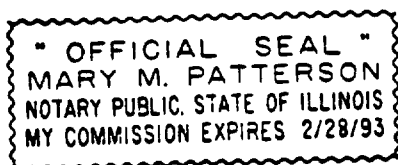
I have read the foregoing Answers, Objections, and other Responses to Plaintiff's Interrogatories and am informed and believe that the same is true and on that ground allege that the matters therein stated are true.

I declare, under penalty of perjury, that the foregoing is true and correct, and that this declaration was executed on July 7, 1989 in Chicago, Illinois.

F. M. Poremski
F. M. Poremski

Subscribed and sworn to before me
this 7th day of July, 1989.

Mary M. Patterson
Notary Public

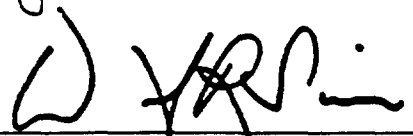


1-F 1900
MKW/nks
FB19485

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause by enclosing the same in an envelope addressed to such attorneys at their business address as disclosed by the pleadings of record herein, with postage fully prepaid, and by depositing said envelope in a U.S. Post Office Box in Peoria, Illinois, on the 27 day of July, 1989.

(See attached list)



David R. Sinn

BLACKHAWK and DUBUQUE Service List (1st Judicial Dist. Iowa)
BLACKHAW - BLACKHAW.E

Judge Peter Van Metre
Black Hawk County Courthouse
316 E. 5th St.
Waterloo, IA 50703

ATTORNEYS FOR PLAINTIFFS

Michael J. Galligan
Micheal D. Maxwell
Galligan & Conlin, P.C.
300 Walnut St.
P.O. Box 93148
Des Moines, IA 50393

**ATTORNEYS FOR AC&S, AMCHEM, ARMSTRONG WORLD, CERTAINTEED, FIBREBOARD,
FLEXITALLIC, GAF, A.P. GREEN, KEENE, OWENS-ILLINOIS, PITTSBURGH CORNING,
UNION CARBIDE, NATIONAL GYPSUM, T&N plc, U.S. GYPSUM**

E. Ralph Walker
Davis, Hockenberg, Wine, Brown,
Koehn & Shors
2300 Financial Center
Des Moines, IA 50309

**ATTORNEYS FOR AIRCO, BOC, HOBART BROS., IOWA-ILLINOIS THERMAL, LINCOLN
ELECTRIC, LOCTITE CORP., LOUISIANA PACIFIC, SEPCO, WINTERBOTTOM SUPPLY**

Michael D. Huppert
Patterson, Lorentzen, Duffield,
Timmons, Irish, Becker & Ordway
312 8th St. - Suite 100
Des Moines, IA 50309

ATTORNEYS FOR AIRCO, HOBART BROS., LINCOLN ELECTRIC

D. Patterson Gloor
Peter J. Borzeka
Cassiday, Schade & Gloor
333 W. Wacker Drive - Suite 1200
Chicago, IL 60606-1289

**ATTORNEYS FOR ANCHOR PACKING, A.W. CHESTERTON, FOSTER WHEELER CORP.,
FOSTER WHEELER ENERGY**

Emmet Tinley
William R. Hughes, Jr.
Stuart, Tinley, Peters, Thorn,
Smits, French & Hughes
310 W. Kanesville Blvd. - 2nd Floor
P.O. Box 398
Council Bluffs, IA 51502

Blackhawk and Dubuque Counties

ATTORNEYS FOR ATLAS-TURNER

Michael A. Bowman
Shimanek, Shimanek & Bowman
114 S. Cedar St.
P.O. Box 351
Monticello, IA 52310

ATTORNEYS FOR BRAND INSULATIONS

ATTORNEYS FOR COMBUSTION ENGINEERING

Ronald A. Riley
John E. Swanson
Hansen, McClintock & Riley
Fleming Bldg. - 8th Floor
Des Moines, IA 50309

ATTORNEYS FOR JOHN CRANE (DUBUQUE COUNTY)

Roger Lathrop
Therese M. Sizer
Betty, Neuman & McMahon
111 E. Third St.
Davenport, IA 52801-1550

ATTORNEYS FOR JOHN CRANE (BLACK HAWK COUNTY)

Roland D. Peddicord
Peddicord, Wharton, Thune, Foxhoven & Spencer
Fleming Bldg. - Suite 300
P.O. Box 9130
Des Moines, IA 50306-9130

ATTORNEYS FOR CROWN CORK & SEAL

T. Todd Becker
Tom Riley Law Firm
4040 First Ave. N.E.
Cedar Rapids, IA 52402

ATTORNEYS FOR EAGLE-PICHER

John R. Timmermier
John M. Burns
Schmid, Mooney & Frederick
1800 First National Center
Omaha, NE 68102

ATTORNEYS FOR GARLOCK

Gregory G. Barntsen
W. Curtis Hewett
Smith, Peterson, Beckman & Willson
35 Main Place
P.O. Box 249
Council Bluffs, IA 51502

Blackhawk and Dubuque Counties

ATTORNEYS FOR OWENS-CORNING

Marvin F. Heidman
John D. Ackerman
Eidsmoe, Heidman, Redmond, Fredregill,
Patterson & Schatz
701 Pierce St. - Suite 200
P.O. Box 3086
Sioux City, IA 51102

ATTORNEYS FOR ROCK WOOL, A.R. BENNETT

Kyle B. Mansfield
Robert E. Diehl
Meagher, Geer, Markham, Anderson,
Adamson, Flaskamp & Brennan
4200 Multifoods Tower
33 S. Sixth St.
Minneapolis, MN 55402

Dick H. Montgomery
Greer, Nelson, Montgomery, Barry and Bovee
Professional Bldg.
P.O. Box 7038
Spencer, IA 51301

ATTORNEYS FOR SPRINKMANN SONS

ATTORNEYS FOR TAYLOR INSULATION

ATTORNEYS FOR GRANT WILSON, ABEX CORP., KAISER ALUMINUM

David Swinton
Ahlers, Cooney, Dorweller,
Haynie, Smith & Allbee
100 Court Ave. - Suite 600
Des Moines, IA 50309

ATTORNEYS FOR CAREY CANADA, CLEOTEX, RAYMARK

Lawrence P. McLellan
Bradshaw, Fowler, Proctor & Fairgrave
1100 Des Moines Bldg.
Des Moines, IA 50309-2464

ATTORNEYS FOR FLINTKOTE

Claude H. Freeman
Grefe & Sidney
2222 Grand Ave.
P.O. Box 10434
Des Moines, IA 50306

Blackhawk and Dubuque Counties

ATTORNEYS FOR METROPOLITAN LIFE

Timothy J. Walker
Jaki Samuelson
Whitfield, Musgrave, Selvy, Kelly & Eddy
1300 First Interstate Bank Bldg.
Des Moines, IA 50309

Richard V. Jones
Joan H. Beyer
Bessler, Amery & Ross
Washington Office Center
44 Whippany Road
Morristown, NJ 07960

ATTORNEYS FOR H.K. PORTER

Gary D. Sharp
Kohl, Secrest, Wardle, Lynch, Clark & Hampton
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-0040

Richard J. Howes
Howes & Anderson, P.C.
612 Equitable Bldg.
604 Locust St.
Des Moines, IA 50309

ATTORNEYS FOR DRESSER INDUSTRIES, J.D. MOTT, HARBISON-WALKER REFRACTORIES

Patrick M. Roby
Shuttleworth & Ingersoll, P.C.
500 MNB Bldg.
P.O. Box 2107
Cedar Rapids, IA 52406

ATTORNEYS FOR A.Y. McDONALD, ALLIED INSULATION

Henry A. Harmon
Grefe & Sidney
2222 Grand
P.O. Box 10434
Des Moines, IA 50306

ATTORNEYS FOR A.Y. McDONALD

R. Todd Gaffney
Duncan, Jones, Riley & Finley
Equitable Bldg. - 4th Floor
Des Moines, IA 50309

Blackhawk and Dubuque Counties

ATTORNEYS FOR THIESSEN

Alan Blackwood
Blackwood, Nowinski & Swanson
3913 - 15th St. D
Moline, IL 61265

ATTORNEYS FOR MECHANICAL INSULATION

Jack E. Dusthimer
Carlin, Hellstrom & Bittner
1000 First Bank Center
201 W. Second St.
Davenport, IA 52801

ATTORNEYS FOR W.R. GRACE (BLACK HAWK COUNTY)

David Dutton
Mioser, Thomas, Beatty, Dutton, Braun & Staack
3141 Brockway Road
P.O. Box 810
Waterloo, IA 50704

ATTORNEYS FOR W.R. GRACE (DUBUQUE COUNTY)

Elliott R. McDonald
McDonald, Stonebraker & Cepican
P.O. Box 2746
Davenport, IA 52809

ATTORNEYS FOR KRETSCHMER-TREADWAY CO.

Robert M. Bertsch
O'Connor & Thomas
200 CyCare Plaza
Dubuque, IA 52001

ATTORNEYS FOR GENERAL REFRACTORIES, GREFCO

Mark J. Wiedenfeld
Grefe & Sidney
2222 Grand
P.O. Box 10434
Des Moines, IA 50306

ATTORNEYS FOR CHRISTY REFRACTORIES

ATTORNEYS FOR CLARK GASKET

ATTORNEYS FOR GENERAL INSULATION

ATTORNEYS FOR INTERSTATE PIPE & SUPPLY

ATTORNEYS FOR BROWN LUMBER

ATTORNEYS FOR INSULATION SERVICES

Blackhawk and Dubuque Counties

ATTORNEYS FOR IOWA ASBESTOS

Hayward L. Draper
Eric P. Slotter
Nyemaster, Goode, McLaughlin,
Emery & O'Brien, P.C.
699 Walnut St.
1900 Hub Tower
Des Moines, IA 50309

ATTORNEYS FOR L & L INSULATION

Stephen D. Hardy
Greife & Sidney
2222 Grand Avenue
P.O. Box 10434
Des Moines, IA 50306

ATTORNEYS FOR GEORGIA PACIFIC, RUTLAND FIRE CLAY

Charles D. Hunter
Robert D. Sharp
Belin, Harris, Helmick, Tesdell,
Lamson, McCormick
2000 Financial Center
Des Moines, IA 50309

ATTORNEYS FOR MacARTHUR CO.

Jon P. Parrington
Pustorino, Pederson, Tilton & Parrington
4005 W. 65th St. - Suite 200
Minneapolis, MN 55435

Jody A. Dible
Berenstein, Vriezelaar, Moore, Moser & Tigges
300 Commerce Bldg.
P.O. Box 1557
Sioux City, IA 51102

ATTORNEYS FOR UNITED STATES MINERAL

Robert L. Fanter
Kevin M. Reynolds
Whitfield, Musgrave, Selvy, Kelly & Eddy
1300 First Interstate Bank Bldg.
Des Moines, IA 50309

ATTORNEYS FOR EMPIRE ACE

Thomas J. Logan
Hopkins & Huebner
Terrace Center - Suite 111
2700 Grand Ave.
Des Moines, IA 50312

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Sabinite	Acoustical Plaster	1930	*1964	Fort Dodge, IA
		1930	1945	Midland, CA
		1930	1945	East Chicago, IN
		1930	*1964	New Brighton, NY
		1930	1945	Gypsum, OH
Audicote	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Hi-Lite	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Red Top Trowel Finish	Finish Plaster	1930	1935	Gypsum, OH
		1930	1935	East Chicago, IN
				Fort Dodge, IA
Oriental Interior Finish Plaster	Finish Plaster			New Brighton, NY
		1950	1951	Fort Dodge, IA
		1942	1972	Oakfield, NY
		1942	1972	Fort Dodge, IA
		1942	1972	New Brighton, NY
		1942	1972	Sweetwater, TX
		1942	1944	Boston, MA
				Gypsum, OH
				Philadelphia, PA
		1949	1950	Jacksonville, FL
Red Top Cover Coat	Finish Plaster			Norfolk, VA
		1949	1972	Philadelphia, PA
		1942	1946	Milwaukee, WI
Red Top Patching Plaster	Finish Plaster	1948	1954	Southard, OK
		1948	1964	New Brighton, NY
		1929	1947	Gypsum, OH
				New Brighton, NY
		1942	1946	Nephi, UT
Red Top Wood Fiber Plaster - Regular	Basecoat	1942	1951	Milwaukee, WI
		1944	1947	South Gate, CA
		1945	1972	East Chicago, IN
				Heath, MT
		1945	1952	Nephi, UT
		1945	1959	Midland, CA
		1945	1963	Fort Dodge, IA
		1945	1963	Detroit, MI
		1945	1965	Sweetwater, TX
		1945	1966	Loveland, CO
		1945	1967	Southard, OK
		1945	1960	Plaster City, CA
		1948	1952	Gerlach, NV
		1948	1972	Sigurd, UT
		1952	1960	Empire, NV

2D. Saranac Agreement - U.S. Gypsum after reasonable inquiry has not located a copy of this document in the Company's files and presently believes that its counsel obtained a copy only during the course of asbestos litigation, after which the document was added to the Company's litigation document collection. U.S. Gypsum believes that the document was signed by Mr. Shaver but after reasonable inquiry, the information known or readily obtainable by it is insufficient to enable it to admit or deny whether this document was received by U.S. Gypsum in the form attached to plaintiff's request shortly after it was generated. U.S. Gypsum admits the genuineness and authenticity of this document, that it is an accurate copy of the original, and that it was made contemporaneously to the event, activity or occurrence. U.S. Gypsum has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to admit or deny whether this document is a business record of another company or organization, or whether it was the regular practice of that business activity to make such documents. U.S. Gypsum denies that this document is its business record, or that it was prepared by or at its direction.

(e) USG 11

3. Documents not found in U.S. Gypsum's files; cannot be confirmed as produced to the company in litigation - The following documents have not been found in the files of United States Gypsum Company and United States Gypsum Company cannot confirm said documents were produced to it during the course of the asbestos litigation. United States Gypsum Company has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to either admit or deny whether said document is genuine, authentic, an accurate copy of the original, is a business record of another company or organization, was made contemporaneously to the event, activity or occurrence, was made in the course of a regularly conducted business activity or whether it was a regular practice for that business activity to make such documents. United States Gypsum Company denies that this document is its business record, was prepared by or at its direction or that it received a copy on or about the date indicated thereon or at or near the time of the events and facts recorded therein.

- (a) USG 22
- (b) USG 23
- (dd) USG 88
- (w) USG 214

NO. 91-03881-A

JAMES GRADY OVERSTREET; CLEOPHAS
PARNELL and DOROTHY PARNELL; TESSEL
TAYLOR JONES, Sr.; JAMES DEMPSY
MAYO and HAZLE MAYO; and SAM PETTAWAY
and MINNIE LEE PETTAWAY,

IN THE DISTRICT COURT OF

Plaintiffs,

DALLAS COUNTY, TEXAS

vs.

FIBREBOARD CORPORATION, et al,

Defendants.

14TH JUDICIAL DISTRICT

UNITED STATES GYPSUM COMPANY'S RESPONSES
TO PLAINTIFFS' INTERROGATORIES TO DEFENDANT

Defendant, United States Gypsum Company, in preparing a response to Plaintiffs' First Request for Production and Interrogatories has classified documents into three categories. Category 1 documents are those documents which United States Gypsum Company has located within its files; Category 2 are documents United States Gypsum Company has received during the course of the asbestos litigation but these documents were not located in the files of United States Gypsum Company; Category 3 are documents not found in the files of United States Gypsum Company and which United States Gypsum Company cannot confirm were produced to it during the course of the asbestos litigation.

RESPONSES TO PLAINTIFFS' REQUEST
FOR PRODUCTION AND INTERROGATORIES

Defendant United States Gypsum Company responds as follows with regard to the documents noted below:

- (b) The contract or agreement under which such indemnity is claimed;
- (c) The nature and terms of the indemnifying agreement; and,
- (d) The identity of all documents related to the subject matter of this interrogatory.

ANSWER: 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 this defendant's response to Interrogatory No. 64.

INTERROGATORY NO. 68: Other than as may have been listed in response to the above interrogatories, is there now, or has there ever been in existence, any bond, guarantee or suretyship in favor of defendant for acts or omissions arising in your business operations which result(ed) in liability, personal injury or property damages? If so, please state the name and address of the bonding company, guarantor or surety, the effective dates of coverage and the nature and extent of the coverage provided, including limits of liability.

ANSWER: 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 this defendant's response to Interrogatory No. 64.

INTERROGATORY NO. 69: To the best of your knowledge are you an additional insured, or have you been an additional insured, since 1965, under any liability insurance policy providing liability insurance coverage for the operation of your business or the acts alleged in plaintiffs' Complaint? If so, please state the following:

- (a) The name and address of the underwriting insurance company;
- (b) The name and address of the insurance agency or broker through whom the insurance coverage procured;
- (c) The dates of initiation, inspection, renewal and expiration of the policy;
- (d) The nature of coverage provided;
- (e) The liability policy limit or limits;
- (f) Whether or not, in your opinion, that liability insurance policy provides coverage for the acts alleged in plaintiffs' Complaint or any judgment which may be entered against defendant in this lawsuit; and,
- (g) The identity of any such policies or documents.

ANSWER: 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 this defendant's response to Interrogatory No. 64.

INTERROGATORY NO. 70: Has defendant, defendant's organizational units, predecessors, subsidiaries, or affiliated entities at any time prepared any form of annual or periodic financial statement or report, such as an annual report, shareholder report, profit and loss statement, balance sheet, SEC form 10-K or form 10-Q, etc.? If so, please do the following as to each such financial statement or record:

- (a) Identify the statement or report, describe its content, summarize its purpose and state its frequency of preparation;
- (b) Identify each of your accountants since 1960 and state the period of service of each account;
- (c) State the gross value of your sales in each year since 1960;
- (d) State your net worth in each year since 1960;

- (e) State the gross value of your total assets in each year since 1960; and,
- (f) Identify all financial statements or reports and identify all documents relating to the subject matter of this interrogatory.

ANSWER: Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 71: State the names and addresses of all lay witnesses whom you presently intend to call to testify at trial, and briefly state the subject matter of their testimony and what connection each such person has with matters relevant to this lawsuit (e.g., former co-workers of plaintiff, former plant manager of plant X, etc.). Supplement this list as you ascertain any additional witnesses.

ANSWER: Unknown at this time. This defendant reserves the right to supplement this answer.

INTERROGATORY NO. 72: Please state whether the defendant has a statement, signed, adopted or approved by either (1) any person named in answer to these interrogatories or (2) any other person with knowledge concerning the facts of this lawsuit.

(a) For each such statement, please state:

- (1) Whether the statement is in question-and-answer or narrative form;
- (2) Whether the person giving it received a copy of the statement;
- (3) Whether the statement was signed;
- (4) If the statement was not signed, the method by which it was adopted or approved;

- (5) The name and present address of the person by whom the statement was taken;
 - (6) When the statement was taken;
 - (7) Where the statement was taken;
 - (8) The name and address of the person having custody of the statement; and,
 - (9) Please attach copies of said statements to these answers.
- (b) For each such person named, please state whether the defendant has a stenographic, mechanical, electrical or other recording or transcript of an oral statement of such person and also state:
- (1) Whether the statement is in question-and-answer or narrative form;
 - (2) Whether the person giving it received a copy of the statement;
 - (3) The method by which the statement was preserved;
 - (4) The name and present address of the person who took the statement;
 - (5) The name and address of the person who has custody of the statement; and,
 - (6) Please attach copies of transcripts of said statements to these answers.

ANSWER: None other than those obtained through formal discovery.

INTERROGATORY NO. 73: Has the defendant or anyone acting on behalf of the defendant conducted an investigation into any facts or circumstances concerning the claims involving any of these actions? If so, state:

- (a) The name and address of all persons taking part in the investigation;
- (b) Identify the employer of all persons named in (a) above;
- (c) Whether or not any written reports were made and, if so, the name and address of the person having custody of said reports; and,

- (d) Please identify all documents relating to the investigation.

ANSWER: None other than through formal discovery proceedings.

INTERROGATORY NO. 74: State the name, address and business or professional title of each person whom you expect to call as an expert witness at trial as to any contention whether medical, cause and effect, activity of a defendant or any other matter for which you intend to have expert testimony. For each such expert, please state:

- (1) The subject matter on which the expert is expected to testify;
- (2) Whether the expert has prepared a written report on this case;
- (3) The substance of the facts and opinions to which the expert is expected to testify; and,
- (4) Set forth a summary of the grounds of each such opinion.

Supplement this answer as you ascertain any additional expert witnesses and when written reports are subsequently prepared.

ANSWER: Unknown at this time. This defendant reserves the right to supplement this answer.

INTERROGATORY NO. 75: Please identify each present or past employee of defendant, defendant's organizational units, predecessors, subsidiaries, or affiliated entities who has ever testified under oath or been deposed in connection with any asbestos-related lawsuit or claim and state the following as to each such employee:

- (a) The specific dates of the testimony and/or depositions;
- (b) The nature of each such occasion (e.g., trial testimony, discovery deposition, videotape deposition, etc.);

- (c) The court or tribunal as well as full caption and docket or file number for each such occasion;
- (d) The identity of the plaintiff's attorney by name, firm and business address for each such occasion;
- (e) The identity of the court reporter or stenographer by name, firm and business address for each such occasion;
- (f) Whether you possess a copy of a transcript as to each such occasion and, if so, identify the current custodian of the transcript; and,
- (g) Whether any of these occasions was videotaped, identifying the videotaper by name, firm and business address.

ANSWER: See attached Exhibit No. 9.

INTERROGATORY NO. 76: Please identify which of the lay or expert witnesses listed by you in response to these interrogatories who have ever testified under oath or been deposed in connection with any asbestos-related lawsuit or claim. For each such person, please state:

- (a) The specific dates of the testimony and/or depositions;
- (b) The nature of each such occasion (e.g., trial testimony, discovery deposition, videotape deposition, etc.);
- (c) The court or tribunal as well as full caption and docket or file number for each such occasion;
- (d) The identity of the plaintiff's attorney by name, firm and business address for each such occasion;
- (e) The identity of the court reporter or stenographer by name, firm and business address for each such occasion;
- (f) Whether you possess a copy of a transcript as to each such occasion and, if so, identify the current custodian of the transcript; and,
- (g) Whether any of these occasions was videotaped, identifying the videotaper by name, firm and business address.

ANSWER: Not applicable.

INTERROGATORY NO. 77: Please identify (1) each document defendant will offer in evidence and (2) any other document, study, writing, treatise or other material that any expert witness intends to rely upon, use, or testify about at the trial of this case to support the claims and defenses contained in defendant's answer.

ANSWER: Unknown at this time. This defendant reserves the right to supplement this answer.

INTERROGATORY NO. 78: Does defendant have a policy, plan or program for record or document retention or destruction?

- (a) If so, please describe such plan in detail.
- (b) If the plan is different for separate categories of records, please describe the plan for each category.
- (c) Please include the following in your description:
 - (1) The name and title of the custodian of the records;
 - (2) The length of time for which records are retained;
 - (3) The titles and names of the personnel responsible for determining the policy or plan from 1930 to present;
 - (4) The titles and names of the personnel responsible for the removal and destruction of any records, pursuant to any such plans from 1930 to present; and,
 - (5) The whereabouts of any repositories of records of your business activities which are more than ten (10) years old.

ANSWER: This defendant has a record retention policy in place. A copy of the current policy will be made available pursuant to a properly filed request to produce.

INTERROGATORY NO. 79: Pursuant to your record destruction or retention policy or otherwise, have you destroyed any documents, records or writings pertaining to:

- (a) Health hazards of asbestos;
- (b) Workmen's Compensation claims arising out of asbestosis, lung cancer, mesothelioma, cor pulmonale, pneumoconiosis, or pulmonary fibrosis;
- (c) The placement of warning labels on your products;
- (d) Hazardous conditions in your plants or factories;
- (e) Funding of studies about health hazards of asbestos; and,
- (f) Lawsuits arising out of injuries alleged to have been caused by asbestos.

ANSWER: See this defendant's response to Interrogatory No. 78.

INTERROGATORY NO. 80: If your answer to the previous interrogatory is affirmative, list by author, date and subject matter each such document destroyed.

ANSWER: See this defendant's response to Interrogatory No. 78.

INTERROGATORY NO. 81: Does defendant contend that plaintiff improperly used its products? If so, please set out in detail in what respect said products were improperly used by plaintiff.

ANSWER: Unknown at this time. Discovery continues.

INTERROGATORY NO. 82: Please state each fact, and identify all documents and witnesses which you contend support your allegation in your answer that plaintiffs' claims are barred by the statute of limitations.

ANSWER: Unknown at this time. Discovery continues.

INTERROGATORY NO. 83: Please state separately as to each fact and identify all documents and witnesses which you contend support your allegation in your answer that plaintiffs' claims are barred by comparative fault and/or assumption of risk.

ANSWER: Unknown at this time. Discovery continues.

INTERROGATORY NO. 84: Please state the names, addresses, and telephone numbers of all current or former employees of defendant who have any knowledge concerning job sites at which defendant sold, delivered, used, installed, or removed insulation or asbestos-containing products.

ANSWER: Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant has employed thousands of employees since its inception and thus it would be impossible to determine who would have the knowledge or information that plaintiff is seeking. Also, U. S. Gypsum does not possess any records maintained in the normal course of business which identify who the ultimate user of the product was or where it was installed. Without waiving this objection, and with respect to products sold, and with respect to jobsites listed on the "1JD JS-1" Galligan and Conlin Master Jobsite List, see the attached Exhibit Nos. 10-17 that, to the best current knowledge, information and belief of this defendant, list sales persons employed by this defendant in the states of Iowa, Illinois, Kansas, Louisiana, Maryland, North Dakota, Nebraska and Wisconsin.

INTERROGATORY NO. 85: Please state the names, addresses, and telephone numbers of all current or former employees of defendant who have any knowledge concerning product names, manufacturer names, brand names, or generic

types of insulation or asbestos-containing products sold, delivered, used, installed or removed by defendant.

ANSWER: Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant has employed thousands of employees since its inception and thus it would be impossible to determine who would have the knowledge or information that plaintiff is seeking. Also, U. S. Gypsum does not possess any records maintained in the normal course of business which identify who the ultimate user of the product was or where it was installed. Without waiving this objection, and with respect to products sold, and with respect to jobsites listed on the "1JD JS-1" Galligan and Conlin Master Jobsite List, see the attached Exhibit Nos. 10-17 that, to the best current knowledge, information and belief of this defendant, list sales persons employed by this defendant in the states of Iowa, Illinois, Kansas, Louisiana, Maryland, North Dakota, Nebraska and Wisconsin.

INTERROGATORY NO. 86: Please state the names, addresses, and telephone numbers of all current or former employees of defendant who have any knowledge concerning customers, contractors, distributors, manufacturers, or wholesalers of insulation or asbestos-containing products with whom defendant had dealings between 1930 and the present.

ANSWER: Objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence. Further, this defendant has employed thousands of employees since its inception and thus it would be impossible to determine who would have the knowledge or information that plaintiff is seeking. Also, U. S. Gypsum does not possess any records maintained in the normal course of

1-F 1900
MKW/nks
FB19485

business which identify who the ultimate user of the product was or where it was installed. Without waiving this objection, and with respect to products sold, and with respect to jobsites listed on the "1JD JS-1" Galligan and Conlin Master Jobsite List, see the attached Exhibit Nos. 10-17 that, to the best current knowledge, information and belief of this defendant, list sales persons employed by this defendant in the states of Iowa, Illinois, Kansas, Louisiana, Maryland, North Dakota, Nebraska and Wisconsin.

MEYER, ROYSTER, VOELKER
& ALLEN
PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 600
JEFFERSON BANK BUILDING
PEORIA ILLINOIS 61602
(309) 676-0400

1B1. In-house business records found in U.S. Gypsum's files - This defendant admits that this document is genuine, authentic, and an accurate copy of a document found within the files maintained by United States Gypsum Company. United States Gypsum Company admits that this document is its business record and was prepared by or at the direction of United States Gypsum Company. United States Gypsum Company admits that this document was made at or near the time of the event by or from information transmitted by a person with knowledge and was made in the course of a regularly conducted business activity and that it was the regular practice of that business activity to make the document. With respect to documents comprising individual pages of operating bulletins, asterisked below, it is denied that such individual pages constituted the complete operating bulletin in effect from time to time.

(j)	USG 3	(mm)	USG 97
(k)	USG 4	(nn)	USG 101
(p)	USG 49*	(pp)	USG 103*
(x)	USG 55	(vv)	USG 113
(z)	USG 57*	(aaa)	USG 127
(aa)	USG 69*	(bbb)	USG 130
(hh)	USG 86	(hhh)	USG 149
(jj)	USG 90	(iii)	USG 189
(ll)	USG 95		

1B3. In-house documents not business records (hearsay) found in U.S. Gypsum's files - This defendant admits that this document is genuine, authentic, and an accurate copy of a document found within the files maintained by United States Gypsum Company. United States Gypsum Company admits that this document was prepared by or at the direction of United States Gypsum Company, that the document was made at or near the time of the event and that it was made in the course of a regularly conducted business activity, and that it was the regular practice of that business activity to make the document. United States Gypsum Company denies that all statements made in the document were made by or from information transmitted by a person with knowledge, and United States Gypsum Company therefore denies that this document is a business record and reserves the right to object to the admission into evidence of such document as hearsay.

(d)	USG 7	(ww)	USG 115
(gg)	USG 84	(yy)	USG 125
(oo)	USG 102	(zz)	USG 126
(qq)	USG 107	(ccc)	USG 134
(rr)	USG 110	(fff)	USG 139
(ss)	USG 111	(g)	USG 181
(uu)	USG 112	(n)	USG 187

1B5. In-house document not business records (not regularly prepared, hearsay) found in U.S. Gypsum's files - This defendant admits that this document is genuine, authentic, and an accurate copy of a document found within the files maintained by United States Gypsum Company. United States Gypsum Company admits that this document was prepared by an employee of United States Gypsum Company, and that the document was made at or near the time of the event. United States Gypsum Company denies that the document was made in the course of a regularly conducted business activity, that it was the regular practice of that business activity to make the document, or that all statements made in the document were made by or from information transmitted by a person with knowledge, and United States Gypsum Company therefore denies that this document is a business record and reserves the right to object to the admission into evidence of such document as hearsay.

(i) USG 200

1C1. Found in U.S. Gypsum's files, but not authored by U.S. Gypsum - This defendant admits that this document is an accurate copy of a document found within the files maintained by United States Gypsum Company. United States Gypsum Company has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to either admit or deny that this document is genuine, authentic, a business record, that it was made in the course of a regularly conducted business activity or that it was the regular practice of that business activity to make the document or that this document was made at or near the time of the event. United States Gypsum Company denies that this document was prepared by or at the direction of United States Gypsum Company. United States Gypsum Company admits that it received the document as of the date of any "Received" stamp or other notation of receipt on the document, but otherwise, after reasonable inquiry, the information known or readily obtainable by it is insufficient to enable it to either admit or deny that the document was received on or about the date indicated thereon or at or near the time of the events and facts recorded therein.

(l) USG 5
(h) USG 44
(y) USG 56
(ff) USG 83
(kk) USG 92
(xx) USG 116
(eee) USG 137

1C3. Gypsum Association documents and the Saranac Progress Report, found in U.S. Gypsum's files - United States Gypsum Company admits that this document is an accurate copy of a document found within the files maintained by United States Gypsum Company. After reasonable inquiry, United States Gypsum Company has been unable to determine the exact time of receipt of this document, but does not intend to contest at trial that it was received at or near the time of the event. United States Gypsum Company has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to either admit or deny that the document is genuine, authentic, a business record, was made in the course of a regularly conducted business activity or was the regular practice of that business activity to make the document. United States Gypsum Company denies that the document was prepared by or at the direction of United States Gypsum Company.

(ggg) USG 142

1C4. NATLASCO documents and Saranac Plant Studie, found in U.S. Gypsum's files - United States Gypsum Company admits that this document is an accurate copy of a document found within the files maintained by United States Gypsum Company, was prepared at the request of United States Gypsum Company and was received by it at or near the time of the event. United States Gypsum Company has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to either admit or deny that the document is genuine, authentic, a business record of another company or organization, was made at or near the time of the event, was made in the course of a regularly conducted business activity or was the regular practice of that business activity to make the document.

(ddd) USG 138

(c) USG 180

1C6. Counsel letter - United States Gypsum Company admits that this document is genuine, authentic, an accurate copy of a document found within the files maintained by United States Gypsum Company, was prepared at the request of United States Gypsum Company and was received by it at or near the time of the event. U.S. Gypsum believes that this document is the business record of its then counsel, was made at or near the time of the event, was made in the course of a regularly conducted business activity and that it was the regular practice of that business activity to make the document.

(m) USG 6

1D. Privileged documents - Objection. This document is protected by attorney-client privilege. This defendant objects to discovery in relation to same.

(tt) USG 213

2A1. In-house business records that cannot be located in U. S. Gypsum's files - United States Gypsum Company denies that this document was found within the files maintained by United States Gypsum Company. United States Gypsum Company admits that this document is its business record and was prepared by or at the direction of United States Gypsum Company. United States Gypsum Company admits that this document was made at or near the time of the event and was made in the course of a regularly conducted business activity and that it was the regular practice of that business activity to make the document. United States Gypsum Company does not intend to contest at trial the genuineness, authenticity or accuracy of the copy of this document. With respect to documents comprising individual pages of operating bulletins, asterisked below, it is denied that such individual pages constituted the complete operating bulletin in effect from time to time.

- (t) USG 51
- (v) USG 53
- (ii) USG 87

2A2. In-house documents not business records (hearsay) not found in U.S. Gypsum's files - U.S. Gypsum denies that this document was found within the files maintained by United States Gypsum Company. This defendant admits that this document is genuine, authentic, and an accurate copy of the original. United States Gypsum Company admits that this document was prepared by or at the direction of United States Gypsum Company, that this document was made at or near the time of the event and that it was made in the course of a regularly conducted business activity, and that it was the regularly practice of that business activity to make the document. United States Gypsum Company denies that all statements made in the document were made by or from information transmitted by a person with knowledge, and United States Gypsum Company therefore denies that this document is a business record and reserves the right to object to the admission into evidence of such document as hearsay.

- (bb) USG 35

2B1. Business records of Canadian Gypsum Company, not found in U.S. Gypsum's files, obtained during litigation - Denied as stated. United States Gypsum Company admits that this document appears to be an accurate copy of a document obtained during the course of litigation from its former subsidiary, Canadian Gypsum Company, but this document was not contained within the files of United States Gypsum Company. United States Gypsum Company denies that this document is a business record of United States Gypsum Company. United States Gypsum Company admits that this document is a business record of its former subsidiary, Canadian Gypsum Company, that it was made at or near the time of the event referred to by or from information transmitted by a person with knowledge, that it was made in the course of regularly conducted business activity and that it was the regular practice of that business activity to make the document. United States Gypsum Company denies that the document was prepared by or at the direction of United States Gypsum Company.

(ee) USG 82

2C. Documents not found in U.S. Gypsum's file; produced to U.S. Gypsum during the course of asbestos litigation, not authored by U.S. Gypsum - United States Gypsum Company has received the following documents during the course of the asbestos litigation but these documents were not contained in the files of United States Gypsum Company. United States Gypsum Company has made reasonable inquiry and the information known or readily obtainable by it is insufficient to enable it to either admit or deny whether said document is genuine, is authentic, is an accurate copy of the original, is a business record of another company or organization, was made contemporaneously to the event, activity or occurrence, was made in the course of a regularly conducted business activity of another company or organization of whether it is a regular practice of that business activity to make such documents. United States Gypsum Company denies that this document is its business record, was prepared by or at its direction or that it received a copy on or about the date indicated thereon or at or near the time of the events and facts recorded therein.

(f) USG 2
(u) USG 52
(cc) USG 76
(o) USG 202
(q) USG 203
(r) USG 204
(s) USG 206

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Red Top Wood Fiber Plaster - Machine Application	Basecoat	1959 1972	1961 1972	Plaster City, CA East Chicago, IN
Cement Plaster Regular. Name changed to Gypsum Plaster 7/67; to Red Top Gypsum Plaster 11/68	Basecoat	1943	1947	Loveland, CO
Red Top Cement Plaster for Machine Application. Name changed to Red Top Gypsum Plaster for Machine Application 7/67	Basecoat	1962 1962 1964	1966 1966 1966	Gypsum, OH Detroit, MI Oakfield, NY
Red Top Structo-Lite Gypsum Plaster for Machine Application	Basecoat	1955	1962	Boston, MA Detroit, MI East Chicago, IN Fort Dodge, IA Gypsum, OH Jacksonville, FL Loveland, CO New Brighton, NY Norfolk, VA Oakfield, NY Philadelphia, PA Plasterco, VA Southard, OK Sweetwater, TX
		1955 1957 1958 1963 1971 1955	1959 1962 1962 1972 1972 1960	Milwaukee, WI Shoals, IN Plaster City, CA Fort Dodge, IA Detroit, MI Empire, NV
Oriental Exterior Finish Stucco	Exterior Finish Stucco	1930 1930 1930 1930 1932 1932 1949 1949	1973 1944 1972 1972 1944 1946 1972 1972	Fort Dodge, IA Gypsum, OH New Brighton, NY Oakfield, NY Sweetwater, TX Boston, MA Philadelphia, PA Milwaukee, WI Jacksonville, FL Philadelphia, PA Norfolk, VA

<u>Product Name</u>	<u>Product Type/Use</u>	<u>(Dates Approximately)</u>		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Pyrobar Mortar Mix	Aggregated plaster	1969 1969	1970 1972	East Chicago, IN New Brighton, NY
Sheetrock Radiant Heat Filler - Machine Application	Specialty plaster	1971	1972	Empire, NV
Bondcrete	Basecoat	1940	1943	Midland, CA
SPRAYDON STANDARD A ^o	Fireproofing	1966	1971	S. Plainfield, NJ Torrance, CA
SPRAYDON STANDARD G ^o	Fireproofing	1968	1970	S. Plainfield, NJ Torrance, CA
SPRAYDON POWERCOTE ^o	Thermal Insulation	1969	1971	Corsicana, TX

^o SprayDon - U. S. Gypsum manufactured this product pursuant to the specification of Sprayon Research Corporation.

FIRECODE V	Fireproofing Plaster	1964	1968	East Chicago, IN New Brighton, NY Empire, NV
FIRECODE D	Fireproofing Plaster	1959	1964	New Brighton, NY East Chicago, IN Empire, NV
***ACOUSTONE 120	Ceiling Tile	1967	1975	Gypsum, OH Walworth, WI
ACOUSTONE 180	Ceiling Tile	1966	1976	Walworth, WI Gypsum, OH
USG	Texture	1964	1976	Gypsum, OH Sweetwater, TX Dallas, TX Chamblee, GA Midway, IL South Gate, CA
Texolite	Texture	1961	1967	Gypsum, OH Dallas, TX New Brighton, NY South Gate, CA
Pac-Tex	Texture	1943	1963	South Gate, CA Dallas, TX Sweetwater, TX

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Imperial QT	Texture	1964	1976	South Gate, CA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY Chamblee, GA
"SHEETROCK" Texture	Texture	1964	1976	Gypsum, OH Dallas, TX Midway, IL South Gate, CA
Textone	Texture	1944	1975	Gypsum, OH Sweetwater, TX South Gate, CA Dallas, TX New Brighton, NY
USG Textone	Texture Paint	1928	1974	South Gate, CA Gypsum, OH Chamblee, GA New Brighton, NY Sweetwater, TX
USG	Texture Paint	1954 1967	1964 1976	Chamblee, GA Sweetwater, TX Gypsum, OH
A-B TEX	Texture Paint	1935 1959 only 1973 only	1949	Gypsum, OH New Brighton, NY Sweetwater, TX Midway, IL Chamblee, GA South Gate, CA
<u>Other Products (By generic group)</u>				
Paste Spackling Putty		1952	1975	New Brighton, NY Gypsum, OH Chamblee, GA Sweetwater, TX
Pipecoverings		1936	1938	Jersey City, NJ

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Joint Compounds		1920s?	1976	Gypsum, OH Midway, IL Chamblee, GA Dallas, TX East Chicago, IN Jacksonville, FL South Gate, CA New Brighton, NY Sweetwater, TX
Rigid Block Insulation		1943 1970	1950 1971	East Chicago, IN Greenville, MS
Siding Shingles		1937	1975	East Chicago, IN
Roofing		1937 1967 Possible other dates.	1946 1975	Jersey City, NJ St. Paul, MN South Gate, CA
Thermalux	Electric Heating	1961	1965	Shoals, IN (Assembled)
Asbestos Cement	Insulation purposes where sheet and block insulation would be impractical.	1936	1939	Jersey City, NJ

NOTE: Not all products were made at all plants at all times listed.

* May have been produced until this date, but sales diminished substantially by the mid-1950's.

** Some of these products (Red Top Trowel Finish; Oriental Interior Finish Plaster; Red Top Cover Coat Finish Plaster; Red Top Patching Plaster; Red Top Wood Fiber Plaster Regular Basecoat; Red Top Wood Fiber Plaster Machine Application Basecoat; Cement Plaster - Regular, Name changed to Gypsum Plaster 7/67, to Red Top Gypsum Plaster Basecoat 11/68; Red Top Cement Plaster for Machine Application - Name changed to Red Top Gypsum Basecoat for Machine Application; Red Top Structo-Lite Gypsum Plaster for Machine Application Basecoat; Oriental Exterior Finish Stucco; Pyrobar Mortar Mix; Sheetrock Radiant Heat Filler - Machine Application) did not have asbestos as part of their formulation at all manufacturing locations at all times.

*** Some of these products did not have asbestos as part of their formulation.

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 continuing.

Asbestos-Containing Products -
Reasons for Discontinuation:

- I. Sabinite was replaced by Audicote and Hi-Lite in the marketplace. Audicote and Hi-Lite were discontinued because the low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- II. Cost of Compliance with proposed lower OSHA standards within the plant.
- III. At the direction of Sprayon Research Corporation.
- IV. The low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- V. Low Profitability.

<u>Product Categories</u>	<u>Reason for Discontinuation</u>	<u>Last Date of Manufacture</u>
* Acoustical Plasters	I	1974
Plasters	II	1972
Fireproofing Plasters	V	1970
** Fireproofing	III	1972
** Thermal Insulation	III	1971
Ceiling Tile	II	1976
Textures	II	1976
Roofing	II	1976
Joint Compounds	II	1976
Pipe Covering	V	1938
Asbestos Cement	V	1939
Rigid Block Insulation	V	1950
Block Insulation	IV	1971
Cement Siding	II & IV	1975
Paste Spackling Putty	II	1975

* Includes production by subsidiary.

** U. S. Gypsum Company manufactured this product pursuant to the specifications of Sprayon Research Corporation.

PERCENTAGE OF ASBESTOS (VOLUME)ACOUSTICAL PLASTERS
PRODUCTSDATEPERCENT ASBESTOS

SABINITE "TF"	No Change	4.90%
SABINITE "B"	04/18/33	2.00%
	11/03/33	4.00%
SABINITE 38 (HYDRAULIC)	11/10/30	2.40%
	04/18/32	3.00%
	01/13/37	2.00%
	07/12/39	3.00%
SABINITE ACOUSTICAL PLASTER	05/23/30	.98%
	01/01/31	2.50%
	06/29/32	2.00%
	05/03/40	4.00%
SABINITE "M" and SABINITE SPECIAL WHITE	10/18/40	4.00%
	01/23/48	6.30%
SABINITE "F"	02/27/44	4.00%
	07/28/50	3.00%
	07/28/50	4.00%
	09/18/52	3.00%
SABINITE "A" or SABINITE HYDROCAL	04/04/31	4.00%
	04/18/33	2.00%
	11/03/33	4.00%
HI-LITE ACOUSTICAL PLASTER	06/09/53	6.20%
	03/31/55	6.30%
AUDICOTE SPECIAL WHITE	09/15/55	8.25%
	08/24/56	7.62%
	10/31/56	7.60%
	12/14/56	8.00%
	03/27/57	7.70%
	12/02/57	6.95%
	12/02/57	22.50%
	03/10/58	7.10%
	03/27/58	6.95%
	04/04/58	22.50%
	05/16/58	16.89%
	05/29/58	17.09%
	05/29/58	16.89%
	05/29/59	16.88%

ACOUSTICAL PLASTERS
PRODUCTS

	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
	05/29/59	16.93%
	12/06/60	8.33%
	07/14/61	8.46%
	07/06/62	7.63%
	08/07/62	7.65%
	02/05/64	7.64%
	08/11/64	7.63%
 AUDICOTE SATIN WHITE	09/15/55	8.43%
	08/24/56	7.78%
	10/31/56	7.76%
	03/27/57	7.47%
	12/02/57	26.24%
	03/10/58	8.06%
	03/27/58	7.47%
	04/04/58	26.24%
	05/16/58	19.66%
	05/29/58	19.49%
	05/29/58	19.66%
	05/29/59	19.22%
	05/29/59	19.70%
	12/06/60	8.60%
	07/14/61	8.73%
	07/06/62	7.85%
	08/07/62	7.87%
	02/05/64	7.86%
	12/22/64	7.85%
 RED TOP ACOUSTICAL PLASTER*	04/25/51	9.70%
 *SPRAYDON STANDARD A	No Change	29.70%
*SPRAYDON STANDARD G	No Change	7.60%
*SPRAYDON POWERCOTE	No Change	30.00%

* SprayDon - U. S. Gypsum manufactured this product pursuant to the specifications of Sprayon Research Corporation.

<u>TEXTURE PRODUCTS</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
PAC-TEX	1943	4.5
	1953	4.5 - 6.0
	1954	3.5

A-B TEX	1935	4.0
	1943	4.5
	1944	4.0
USG TEXTONE TEXTURE PAINT	1928	3.3 - 4.5
	1930	2.8 - 4.5
	1934	3.3 - 4.5
	1938	2.67 - 5.0
	1943	2.67 - 6.0
	1947	2.67 - 8.0
	1952	2.5 - 3.5
	1955	1.2 - 3.5
	1956	2.3 - 3.5
	1958	1.2 - 6.0
	1960	1.2 - 10.0
	1970	.5 - 10.0
	1971	.5 - 3.5
SPECIAL TEXTURE PAINT	No Change	3.0 - 4.0
SPRAY TEXTURE PAINT	No Change	1.5 - 2.5
IMPROVED SPRAY TEXTURE	No Change	1.5 - 2.5
MULTI-PURPOSE TEXTURE	No Change	6.0 - 10.0
SANDED COLORED TEXTURE PAINT	No Change	2.0 - 4.0
USG MULTI-PURPOSE TEXTURE PAINT	1954	1.0 - 1.4
	1964	6.0 - 10.0
USG TEXTURE PAINT	No Change	2.5
SPRAY TEXTURE PAINT	1966	Unknown
	1968	5.0
	1969	2.0
USG MULTI-PURPOSE SPECIAL WHITE	No Change	5.0
USG MULTI-PURPOSE	No Change	6.0 - 10.0
USG MULTI-PURPOSE	No Change	4.0
SPECIAL TEXTURE PAINT	1956	Unknown
USG MULTI-PURPOSE SPRAY TEXTURE	No Change	4.0

USG MULTI-PURPOSE SPRAY TEXTURE	1972 1973	Unknown 4.0
SPRAY TEXTURE	No Change	1.5 - 2.5
AB TEX TEXTURE PAINT	No Change	.5
AB TEX TEXTURE PAINT	No Change	1.2 - 1.6
USG TEXTURE	No Change	1.6 - 3.5
MULTI-PURPOSE	1971	Unknown
SPRAY TEXTURE PAINT WHITE	1969 1973	7.3 0.0
SPRAY TEXTURE PAINT	1958 1971	1.5 - 3.0 4.5 - 6.0
SPRAY TEXTURE PAINT	No Change	1.5 - 3.0
SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SPRAY TEXTURE	No Change	1.5 - 3.0
SPRAY TEXTURE	No Change	1.5 - 4.0
SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SIMULATED ACOUSTICAL SPRAY	1961 1962	Unknown 8.0
AGGREGATED SPRAY TEXTURE	No Change	1.0
AGGREGATED SPRAY TEXTURE	1962 1963	1.0 .5 - 1.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.0
"QT" SIMULATED ACOUSTICAL SPRAY	1964 1969 1971	2.0 5.0 4.4
IMPERIAL QT SPRAY	No Change	1.5
AGGREGATED SPRAY	No Change	2.8

IMPERIAL QT REGULAR VERMICULITE	No Change	2.0
SPRAY TEXTURE	No Change	5.0
SMOOTH HARD FINISH	No Change	1.0
IMPERIAL QT TEXTURE	No Change	2.0
USG SUPER HARD SPRAY	No Change	1.2
USG SPRAY TEXTURE	No Change	5.0
SPRAY TEXTURE FINISH	No Change	.1
USG TEXTURE XII	No Change	3.0
USG SPRAY TEXTURE	No Change	5.0
USG TEXTURE XII SUPER VINYL	1971 1972	3.0 Unknown
USG SPRAY TEXTURE FINISH	1971 1974	4.0 5.0
SHEETROCK SMOOTHCOAT	No Change	1.0
USG EXTERIOR TEXTURE WALLBOARD FINISH	No Change	4.0
EXTRA HARD FINE IMPERIAL QT	No Change	1.0 - 3.0
SIMULATED ACOUSTICAL SPRAY TEXTURE	No Change	8.0
SIMULATED ACOUSTICAL SPRAY TEXTURE	No Change	8.0
IMPERIAL QT TEXTURE	No Change	4.0
SIMULATED ACOUSTICAL SPRAY	No Change	6.0
SIMULATED ACOUSTICAL SPRAY	No Change	6.5
SIMULATED ACOUSTICAL SPRAY	No Change	10.0

SIMULATED ACOUSTICAL SPRAY	No Change	3.0
SIMULATED ACOUSTICAL SPRAY	No Change	2.5 - 4.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.5 - 3.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	8.0
IMPERIAL QT	No Change	5.0
IMPERIAL QT	No Change	4.0
MULTI-PURPOSE TEXTURE	No Change	2.6
READY-MIXED SIMULATED ACOUSTICAL SPRAY	1966	Unknown
IMPERIAL QT	1966	4.0
IMPERIAL QT	1966	.94 - 1.0
IMPERIAL QT	1966	2.0 - 3.0
IMPERIAL QT	1966	3.0
IMPERIAL QT Polystrene	1966	6.0
SHEETROCK RADIANT HEAT SIMULATED ACOUSTICAL SPRAY	1966	6.0
SHEETROCK SIMULATED ACOUSTICAL SPRAY	1966	2.0
SHEETROCK SIMULATED ACOUSTICAL SPRAY	1966	3.5
AGGREGATED SPRAY TEXTURE	1966	5.0
IMPERIAL QT REGULAR	1967	Unknown
IMPERIAL QT REGULAR	1967	8.0
NC-4	1968	6.0

IMPERIAL QT	No Change	2.0
USG SPRAY TEXTURE FINISH	1965	.5
USG SPRAY TEXTURE FINISH	1965	.5
XH WHITE	1968	.5 - 1.5
AGGREGATED SPRAY TEXTURE	No Change	1.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	4.0
IMPERIAL QT	No Change	2.0
COARSE VERMICULITE		
IMPERIAL QT	1970	5.1
COARSE VERMICULITE	1971	6.1
USG SPRAY TEXTURE R	No Change	1.5
USG CONCRETE CEILING TEXTURE	No Change	6.0
TEXTONE TEXTURE FINISH	1944	2.5 - 4.5
	1967	3.5 - 5.5
	1972	2.5 - 4.5

Miscellaneous Specialty Plasters - Generally less than 1%

Fireproofing Plasters

Firecode V	Approximately 12%
Firecode V Type D	Approximately 12%

Ceiling Tile

Acoustone 120*	Approximately 3%
Acoustone 180	Approximately 3%

Texture Products - Approximately 3 - 5 %. Investigation continues as to individual texture products.

Paste Spackling Putty - Approximately 3%

Pipecoverings - Approximately 30 - 91%

*Not all formulations contained asbestos.

Joint Compounds - Approximately 3 - 5%

Rigid Block Insulation - Approximately 10 - 21%

Mortar - Less than 1%

Siding Shingles - Approximately 12 - 15%

Roofing Shingles - Approximately 0.6 - 1%

Variation in asbestos content is usually reflective of formula changes relative to working properties.

U. S. Gypsum does not maintain examples of actual packaging in the normal course of business. All packaging contained the product name, this defendant's name, directions and instructions for use. To this defendant's best knowledge, information and belief, the product packaging for its asbestos-containing products was as follows:

Acoustical Plaster	Kraft Paper Bags
Miscellaneous Plasters	Kraft Paper Bags
Stucco	Kraft Paper Bags
Fireproofing Plaster	Kraft Paper Bags
Joint Compound	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Spray Textures	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Block Insulation	Cardboard Cartons
Pipecovering	Cardboard Cartons
Spackling Paste	Metal and plastic cans buckets and pails
Ceiling Tile	Cardboard Cartons
Asbestos Cement	Burlap bags, cardboard cartons

Available packaging bulletins dealing with products which plaintiff can establish were relevant to this lawsuit will be made available to the plaintiff for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606.

ASBESTOS CONTAINING PRODUCTS

Acoustical Plasters - grayish-white;

Miscellaneous Specialty Plasters - white to off-white
plus some pastels for two products;

Fireproofing - grayish-white;

Fireproofing Plasters - white to off-white;

Ceiling Tile - white to off-white

Texture Products - white to off-white;

Paste Spackling Putty, Pipecoverings, Joint Compounds,
Rigid Block Insulation, Mortar - white to off-white;

Siding - white, gray, ivory, green, brown;

Roofing - red, green, blue, brown, black and gray

February 1, 1989

Schedule N

Plant Clinics
and
Medical Personnel
Retained/Consulted
1930-1976

Oakfield, New York

R. C. Warn, M.D.
J. Diasio, M.D.

Chamblee, Georgia

H. M. Schreeder, M.D.
W. C. McGraw, M.D.

Greenville, Mississippi

J. B. Hirsch, Sr., M.D.
O. Beck, M.D.
J. B. Hirsch, Jr., M.D.

Corsicana, Texas

A. L. Grizzafi, M.D.

Dallas, Texas

Launey Medical & Surgical Clinic

D. G. Launey, M.D.
S. L. Gilbert, M.D.
F. C. Atkinson, M.D.
R. F. Duchouquette, M.D.
W. D. Stevenson, M.D.
D. H. Waddell, M.D.
R. R. Henry, M.D.
Z. L. Dameron, M.D.
W. D. Lee, M.D.
A. H. Teddle, M.D.

Trinity Medical Clinic

Jacksonville, Florida

J. H. Mitchell, M.D.
J. L. Mitchell, M.D.

Plasterco, Virginia

J. A. Soyars, M.D.
P. W. Cowherd, M.D.

Sweetwater, Texas

C. A. Rosebrough, M.D.
A. H. Fortner, M.D.
S. A. Loeb, M.D.
J. K. Richardson, M.D.
T. D. Young, M.D.
F. Hood, M.D.
R. L. Price, M.D.

Detroit, Michigan

R. L. St. Louis, M.D.
K. Hergt, M.D.

East Chicago, Indiana

R. J. Liehr, M.D.
F. F. Boys, M.D.
F. A. Benchik, M.D.
G. A. Thegze, M.D.
J. Demkowicz, R.N.

Fort Dodge, Iowa

Fort Dodge Medical Center
T. J. Michelfelder, M.D.
C. L. Dagle, M.D.
M. E. Kraushaar, M.D.
J. J. Landhuis, M.D.
G. L. LeValley, M.D.
J. W. Rathke, M.D.
R. H. Brandt, M.D.
J. R. Kersten, M.D.
W. C. Robb, M.D.
H. H. Kersten, M.D.
R. E. Woodard, M.D.

Gypsum, Ohio

C. J. Yeisley, M.D.
A. J. Miessner, M.D.
P. Hughes, M.D.
K. Ritter, M.D.
K. Akins, M.D.
M. Jennings, R.N.

Shoals, Indiana

E. B. Lett, M.D.
R. E. Chattin, M.D.

Empire, Nevada

Sparks Medical Clinic
J. M. Watson, M.D.
M. Raymond, M.D.
J. C. Kelly, M.D.
F. C. Stokes, M.D.

Torrance, California

P. Casey, M.D.
J. Anable, M.D.
Dr. Cook

South Gate, California

H. Caesar, M.D.
Family Medical Clinic
(Various physicians. Names unavailable)
Firestone Medical Group
(Various physicians. Names unavailable)

Tacoma, Washington

B. Archer, M.D.

Walworth, Wisconsin

D. R. Hansen, M.D.
I. J. Bruhn, M.D.
J. A. Carroll, M.D.
A. C. Sapida, M.D.
Walworth Family Medical Center

Boston, Massachusetts

V. Rubin, M.D.
E. Staffier, M.D.
A. C. Leavitt, M.D.
Sullivan Square
American Mutual Insurance Clinic
Massachusetts General Hospital

Clark, New Jersey

C. T. Decker, M.D.
F. B. Nelson, M.D.
C. F. Dent, M.D.
E. E. Goe, M.D.
S. Wexler, M.D.

Oakmont, Pennsylvania

C. E. Piper, M.D.
F. W. Nicklas, M.D.
H. Hagan, M.D.
Citizens General Hospital

Franklin Park, Illinois

Northwest Medical Clinic LTD.
L. Devira, M.D.
Franklin Park Medical Center
V. Oelrich, R.N.

Rosemont, Illinois

O'Hare Industrial Clinic
Fahey Medical Center
Rush Presbyterian - St. Lukes Occupational
Health Center

Galena Park, Texas

J. Nichols, M.D.
Deaton Clinic

Sigurd, Utah

T. D. Bard, M.D.
R. E. Noyes, M.D.
R. N. Malouf, M.D.
J. G. McGuarrie, M.D.
G. A. Buchanan, M.D.
J. B. Cluff, M.D.

Genoa, Ohio

E. D. Schuiteman

Norfolk, Virginia

E. R. Altizer, M.D.
W. H. Whitmore, M.D.
G. A. Duncan, M.D.
F. Walter, M.D.
A. A. Burke, M.D.
R. L. Payne, M.D.
J. L. Rosenthal, M.D.
P. B. Parsons, M.D.
J. Sakakini, M.D.
K. Jones, M.D.
V. H. Ober, M.D.
Dr. Albanese
J. Foster, M.D.
G. G. Hollins, M.D.
Dr. Labstein
J. M. Ratliff, M.D.
J. A. Vann, M.D.
C. B. Trower, M.D.
R. W. Adams, M.D.
R. R. Powell, M.D.
C. Pole, M.D.
G. A. Duncan, M.D.

Norfolk, Virginia (continued)

D. C. Pryor, M.D.
E. A. Buchan, M.D.
Dr. Kuehn

Santa Fe Springs, California

J. W. Raber, M.D.
Raber Industrial Medical Group

Morrow, Georgia

N. Bateman, M.D.

Stony Point, New York

Dr. Borsinger
Dr. Natelson
Dr. Zuka
Nyack Hospital

Sperry, Iowa

H. M. Patterson, D.O.
J. F. Roules, M.D.
Burlington Medical Center

Wabash, Indiana

F. Whistler, M.D.
R. M. LaSalle, Jr., M.D.
R. M. LaSalle, Sr., M.D.
R. M. LaSalle, M.D.
W. D. Boaz, M.D.
P. Ferguson, M.D.
F. Smyrniotis, M.D.
J. E. Haughn, M.D.
LaSalle Clinic

Baltimore, Maryland

C. C. Chiu, M.D.
F. G. Mainolfi, M.D.
Fort Medical Center

North Kansas City, Missouri

Industrial Clinic North
Fairfax Industrial Medical Clinic

New Orleans, Louisiana

B. Pardue, M.D.
J. Dean, M.D.
Downman Road Clinic

Southard, Oklahoma

R. Richardson, M.D.
R. Kirby, M.D.
T. Perry, M.D.
R. Tavlin, M.D.
K. Godfrey, M.D.
R. McLauchlin, M.D.
M. Carter, M.D.
C. H. Williams, M.D.
B. D. Dotter, M.D.
F. Crowe, M.D.
D. Lagan, M.D.
G. Worcester, M.D.

Warren, Ohio

R. Willoughby, M.D.

Birmingham, Alabama

Thuss Clinic
W. G. Thuss, M.D.
R. J. Smith, M.D.

Union City, Tennessee

J. H. Ragsdale, M.D.
R. E. Clendenin, M.D.
R. G. Latimer, M.D.
J. K. Avery, M.D.
L. W. Jones, M.D.
H. Butler, M.D.
J. Cambell, M.D.
Doctor's Clinic of Union City

Alabaster, Michigan

J. J. Austin, M.D.
H. Brinkman, M.D.
M. E. Field, M.D.
J. R. Gehman, M.D.
J. W. Grigg, M.D.
M. Gueramy, M.D.
H. R. Hess, O.D.
J. E. Jaques, M.D.
L. Kelley, M.D.
V. W. Kershul, M.D.
L. A. Lambert, M.D.
L. A. Laporte, M.D.
O. W. Mitton, M.D.
R. Morin, M.D.
N. Payea, M.D.
R. J. Ruda, M.D.
G. L. Schaiberger, M.D.

Alabaster, Michigan (continued)

J. M. Schuele, M.D.
R. L. Sutton, M.D.
Z. E. Taheri, M.D.
W. Williams, M.D.

Kearny, New Jersey

Plant closed
J. Borino, M.D.
J. Grund Fest, M.D.

Boonton, New Jersey

Acquired 1985

Camden, New Jersey

Plant closed
A. Marks, M.D.
Occupation Health Services

Trenton, New Jersey

Plant closed
P. Albert, M.D.
Helene Fuld Medical Center

Paulsboro, New Jersey

Acquired 11/30/87

New Brighton, New York

Plant closed
H. Crane, M.D.
F. Tellefsen, M.D.
E. Morris, M.D.
Saint Vincent's Hospital
Staten Island Hospital

Port Reading, New Jersey

Acquired 6/76

Fremont, California

Acquired 1983

Philadelphia, Pennsylvania

Plant sold

Conyers, Georgia

Acquired 12/10/80

Mansfield, Texas

Acquired 8/81

Spruce Pine

Acquired 5/12/79

LaMirada, California

Acquired 6/81

U.S. Gypsum has no information on medical personnel for the plants at Jersey City, NJ; St. Paul, MN; Midway, IL; South Plainfield, NJ; Midland, CA; Heath, MT; Loveland, CO; Milwaukee, WI; Nephi, UT; and Philadelphia, PA, which are now closed. In addition, no record information is available for Plaster City, CA. U.S. Gypsum has no information for the plant at Red Wing, MN for years prior to 1985. U.S. Gypsum owned Red Wing in the mid-1960s prior to selling the plant to Conwed Corporation, and USG Acoustical Products, Company (now USG Interiors, Inc.) reacquired the facility in late 1985.

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 file produced to this defendant in litigation by Gypsum Association. This defendant does not know if such individual 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.

<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 (cont.)		<u>Manufacturing & Mining Committee:</u> 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 <u>Technical Committee:</u> 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 <u>Board of Directors:</u> 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	<u>Industrial Hygiene Digest</u> <u>Monthly Abstracts -</u> 1/74 - 12/81 (JDC's) Annual Business Reports (JDC's)

<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>
		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 oth. litigation (Wm. Simpson deposition) (1958-?) Some mass correspondence letters regarding commi J. D. Cornell was on - health and safety, publi information, medical and scientific dated 1978 to 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 1912-1 records of all presentat and papers produced at Phillip E. Schmidt, depo and document production April 17, 1984, in <u>Neil</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'
*International Association Wall and Ceiling Contractors (Associate Member)	1970-1976	none	Some documents in M. V. Cook's and J. Edwards'
*Gypsum Drywall Contractors International (Associate Member)	1960-1976 unknown	none	Some documents in M. V. Cook's and J. Edwards'
*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'
*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 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	

This defendant is primarily insured by the following:

<u>Dates of Coverage</u>	<u>Carrier</u>	<u>Policy Number</u>
prior to 4/1/42	unknown	unknown
4/1/42 - 4/1/43	The Hartford	unknown
4/1/43 - 4/10/49	Liberty Mutual	unknown
4/10/49 - 3/10/52	Lloyd's of London	unknown
3/10/52 - 3/10/55	Lloyd's of London	C36693
3/10/55 - 4/1/58	Lloyd's of London	642295
4/1/58 - 4/1/61	Lloyd's of London	RS907609
4/1/61 - 4/1/62	American Motorists	1 YM 1147000
4/1/62 - 2/1/63	American Motorists	unknown
2/1/63 - 2/1/64	American Mutual	BLPL 952989-12-OD
2/1/64 - 2/1/65	American Mutual	BLPL 952989-12-1D
2/1/65 - 2/1/66	American Mutual	BLPL 952989-12-2D
2/1/66 - 2/1/67	American Mutual	BLPL 952989-12-3D
2/1/67 - 2/1/68	American Mutual	BLPL 952989-12-4D
2/1/68 - 2/1/69	American Mutual	BLPL 952989-12-5D
2/1/69 - 2/1/70	American Mutual	BLPL 952989-12-6D
2/1/70 - 4/1/71	American Mutual	BLPL 952989-12-7D
4/1/71 - 2/1/72	Kemper	1ZM127-724
2/1/72 - 2/1/73	Kemper	2ZM127-724
2/1/73 - 2/1/74	Kemper	3ZM127-724
2/1/74 - 2/1/75	Kemper	4ZM127-724
2/1/75 - 7/1/75	Kemper	5ZM127-724
7/1/75 - 7/30/79	The Travelers	TR-NSL-135T060-1-75
8/1/79 - 7/31/82	CNA	005 30 96 37
8/1/82 - present	Primary self insurance retention administered by Gallagher Bassett Insurance Service	

The amount of coverage, if applicable, is sufficient to cover the instant claims. General questions concerning apportionment of claims and application of deductibles are presently before the courts and unresolved.

<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

UNITED STATES GYPSUM COMPANY EMPLOYEES OR
FORMER EMPLOYEES DEPOSED IN ASBESTOS
PERSONAL-INJURY LAWSUITS

DEPONENT: E. C. Beuthin, former employee

Dykes vs. U. S. Gypsum Company, et al. - U.S.D.C.
Eastern District of Tennessee, Northern Division,
3-82-618, filed 10/28/82, dismissed 4/7/83,
refiled 6/22/83, settled 1/21/84 - Deposed in
Atlanta, GA. on 3/25/83.

Niewiadomski vs. U. S. Gypsum Company, et al. -
U.S.D.C. Western District of Wisconsin, 85C-462-C,
filed 5/24/85 - Deposed in Las Vegas, NV. on
8/21/85.

DEPONENT: W. Borchers, former employee

Thomas vs. Carey-Canadian, et al. - U.S.D.C.
Eastern District of Pennsylvania, 79-2931, filed
7/17/79 - Deposed in Philadelphia, PA. on 1/29/81.

DEPONENT: H. J. Bowman, Manager, Quality Assurance, U. S.
Gypsum Company

Hawkins vs. Celotex, et al. - Court of Common
Pleas, Franklin County, Ohio, 83CV-08-4598, filed
8/8/83 - Deposed in Chicago, IL, on 8/7/85.

Anita P. Strawn vs. Fibreboard Corp., et al. -
U.S.D.C. Western District of Washington,
C85-539-TB, Deposed in Seattle, WA on 3/26/87.

Lila Grossman Smallowitz vs. United States Gypsum
Company, et al., U.S.D.C. Southern District of
New York, 84 Civ 2638 (LBS) - Deposed in Chicago,
Illinois on 4/22/87.

John & Josephine Iandorio vs. Thomas Construction,
et al., Superior Court of New Jersey, Passaic
County, Docket No. L-67755-84 - Deposed in Newark,
New Jersey on 11/12/87.

Maurice & Theresa J. McGoldrick vs. Armstrong
World Industries, Inc., et al., Superior Court of
New Jersey, Middlesex County, Docket No.
L-89106-85E - Deposed in Newark, New Jersey on
January 26, 1988.

DEPONENT:

M. V. Cook, Group Product Manager, Product Management

Kennell vs. Pfizer, Inc., et al. and Blough vs. Pfizer, Inc., et al. - U.S.D.C. Western District of Pennsylvania, 84-0208 and 84-0209, filed 2/14/84 - Deposed in Chicago, IL, on 11/12/84.

DEPONENT:

J. D. Cornell, Manager, Corporate Occupational Health & Safety

Smith vs. W. R. Grace, et al. - Minnesota State District Court, 4th Judicial District, Hennepin County, 776308, filed 2/26/81 - Deposed in Chicago, IL, on 2/22/82 and 8/25/82.

DEPONENT:

R. P. Faust, Vice President, Marketing Services

Bowman vs. Pfizer, et al. - U.S.D.C. Southern District of Ohio, Eastern Division, 3-82-618, filed 12/17/81 - Deposed in Chicago, IL, on 3/15/84.

DEPONENT:

K. S. Freeman, retired Manager, Consumer Product Safety

Smith vs. W. R. Grace, et al. - Minnesota State District Court, 4th Judicial District, Hennepin County, 776308, filed 2/26/81 - Deposed in Chicago, IL, on 8/27/82.

DEPONENT:

T. Hardy, Salesmen

Kennell vs. Pfizer, Inc., et al. and Blough vs. Pfizer, Inc., et al. - U.S.D.C. Western District of Pennsylvania, 84-0208 and 84-0209, filed 2/14/84 - Deposed in Cleveland, OH, on 11/7/84.

DEPONENT:

C. A. Hedblom, M.D., Medical Director

Kennell vs. Pfizer, Inc., et al. and Blough vs. Pfizer, Inc., et al. - U.S.D.C. Western District of Pennsylvania, 84-0208 and 84-0209, filed 2/14/84 - Deposed in Chicago, IL, on 11/13/84.

DEPONENT: J. F. Hernan, Manager, Corporate Quality Assurance
Smith vs. W. R. Grace, et al. - Minnesota State District Court, 4th Judicial District, Hennepin County, 776308, filed 2/26/81 - Deposed in Chicago, IL, on 8/26/82.
Whightsel vs. Pfizer, et al. - U.S.D.C Southern District of Ohio, Eastern Division, 2-83-0125, filed 1/14/83 - Deposed in Chicago, IL, on 6/22/83.
Kennell vs. Pfizer, Inc., et al. and Blough vs. Pfizer, Inc., et al. - U.S.D.C. Western District of Pennsylvania, 84-0208 and 84-0209, filed 2/14/84 - Deposed in Chicago, IL, on 11/12/84.

DEPONENT: C. M. Howard, Product Manager, Joint Treatment Textures, Product Management
Kennell vs. Pfizer, Inc., et al. and Blough vs. Pfizer, Inc., et al. - U.S.D.C. Western District of Pennsylvania, 84-0208 and 84-0209, filed 2/14/84 - Deposed in Chicago, IL, on 11/13/84.

DEPONENT: G. R. Krug, former employee
Dykes vs. U. S. Gypsum Company, et al. - U.S.D.C. Eastern District of Tennessee, Northern Division, 3-82-618, filed 10/28/82, dismissed 4/7/83, refiled 6/22/83, settled 1/21/84 - Deposed in Atlanta, GA, on 3/25/83.

DEPONENT: E. W. Lucke, Director, Corporate Technical Services
Dykes vs. U. S. Gypsum Company, et al. - U.S.D.C. Eastern District of Tennessee, Northern Division, 3-82-618, filed 10/28/82, dismissed 4/7/83, refiled 6/22/83, settled 1/21/84 - Deposed in Atlanta, GA, on 4/6/83.

DEPONENT: R. G. Waite, Manager, Marketing - Acoustical, Acoustical and Mineral Fiber Division
Bowman vs. Pfizer, et al. - U.S.D.C. Southern District of Ohio, Eastern Division, C-2-81-1492, filed 12/17/81 - Deposed in Chicago, IL, on 3/16/84.

All deponents may be reached through the Legal Department,
U. S. Gypsum Company, 101 South Wacker Drive, Chicago, IL,
60606-4385

2/1/88

IOWA

<u>Name</u>	<u>Approximate Employment Dates</u>
1. D. Alseth	1952-1967
2. J. Althoff	1954-1960's
3. J. Artzer	1970's
4. D. Balleau	1960-1972
5. K. H. Batman	1941-1947
6. J. Beha	1931-1944
7. D. L. Berning	1960's
8. T. Burke	1963-1965
9. H. L. Cooper	1930-1938
10. R. E. Currier	1973-1975
11. R. Dahl	1960-1965
12. J. DeNatalle	late 1940's-early 1950's
13. R. Dunn	1940's
14. F. B. Erwine	1940-1945
15. D. Gilchrist	1960's
16. W. Grey	1960's
17. R. Griffith	1950-1952
18. H. C. Ihde	1939-1942
19. L. Jurgens	1972-1976
20. M. Justmann	1960-1963
21. C. Knutzen	1960's
22. J. Kurth	1960's
23. J. L. Mackin	1931-1944
24. E. May	1934-1944

25. M. McCrackin	1951-1957
26. V. M. McLaughlin	1950-1969
27. S. McVicker	early 1950's
28. D. Menard	1972
29. W. R. Miller	1937-1946
30. B. Muelboeck	1954-1957
31. D. Munro	late 1960's-1970's
32. J. S. Nicholas	1936-1941
33. R. J. Olsen	1929-1945
34. L. Paulson	1950's-1960's
35. B. Petchel	mid 1950's
36. M. Seaton	1956-1987
37. C. E. Schulte	1956-1958
38. W. Somerville	early 1960's
39. P. Stark	1950's-1986
40. R. Teitz	1960's-1970's
41. D. Van Metre	late 1940's-1950's
42. J. Westerdale	1949-late 1960's
43. J. Zmuda	1962-1987

ILLINOIS

<u>Name</u>	<u>Approximate Employment Dates</u>
1. J. Aherns	Mid 1960's
2. H. Allen	Late 1950's-1967
3. J. Allen	1963-1969
4. J. Bishoff	1970's
5. S. Blackwood	1973
6. R. Burling	1960's
7. J. Carmody	1965-1970
8. S. Cowman	1971-1987
9. C. Custer	Late 1960's-1972
10. R. Dolmctsh	1965-1967
11. E. Darcy	1950's-1965
12. M. Dirnane	Early 1970's
13. W. Dooley	1960's
14. D. Dreas	Early 1960's-1972
15. D. R. Duvall	1974
16. T. Egan	1963
17. T. Eckland	Late 1950's-Mid 1960's
18. W. Edwards	1940's-1970
19. G. Fink	Early 1970's
20. T. Garnett	1970's
21. G. Gforer	1960's
22. R. Hammond	1930's-1968
23. J. Hermanek	1974
24. W. Horton	1950's-Early 1980's

25. L. Jacobson	1960-1965
26. J. Jaeger	1969
27. E. Kaufeldt	1964-1970
28. R. Keefer	1955-1963
29. W. Kidd	1962 and 1965
30. G. Lewis	1971-1973
31. J. Lisky	1960's
32. J. Lullo	Mid 1960's-Early 1970's
33. L. Masterson	1963-1970's
34. W. McGuire	Late 1950's-1960's
35. J. R. McIntyre	Early 1970's
36. J. McMullin	Late 1950's-Early 1960's
37. J. Moore	1960
38. M. Moyer	1960-1965
39. C. Mueller	1965-1971
40. D. Munro	1970's
41. W. Murphy	1962-1973
42. M. Murphy	Early 1970's
43. W. Nelson	1963-1971
44. D. Newquist	1961-1986
45. W. O'Connor	1960-1965
46. R. F. O'Malley	Early 1960's-1975
47. C. Parker	Mid 1960's-Early 1970's
48. J. Parsons	1965-1970
49. D. Pearson	1960-1965
50. P. Pearson	1963
51. D. Pence	1963-1970

52. A. M. Personious	Early 1960's
53. J. Peterson	Early 1970's
54. D. Powers	Late 1950's-1962
55. T. Rafats	1970's
56. A. Ramsey	1960's
57. W. G. Roche	1950's-1970's
58. R. Roll	1972-1975
59. R. Sanders	1952-1982
60. M. Seaton	1962-1965
61. W. Shelton	Late 1950's-1963
62. W. Smith	1960's-1970
63. W. Smith	1930's-1960's
64. R. Spitzig	1965-1987
65. J. Starick	1960's
66. R. Sterling	1930's-Late 1960's
67. L. Stieghorst	1960's
68. W. Stout	1960's
69. D. Summers	1961-1962
70. D. Talga	1964-1970
71. J. Thayer	1969-present
72. F. Walker	1960's
73. W. Wallace	Late 1960's
74. A. Williams	1950's-1970's
75. J. B. Williams	1960-1964
76. L. Zimmerman	1960's-1970's
77. J. Zmuda	1970's

KANSAS and MISSOURI

<u>Name</u>	<u>Date</u>
J. Adams	1954-1961
H. Alberg	1969-1975
W. Blew	1961-1971
T. Boucher	1949-early 1960's
J. Egle	1958-1962
R. Fay	1954-1963
G. Hamel	1965-1975
D. Henrichs	1972-present
J. Jaeger	1959-1960 1964
W. Long	1959-1969
J. Long	1940's-1968
G. Maricic	1950's-1980
F. Markham	early 1960's-1978
G. Mendels	1976-1978
D. Meyer	1955-1969
J. Phillips	1957-1961
W. Reed	1945-1987
C. Schulte	1961-1987
R. Smith	1960-1962 1964-1966

LOUISIANA

<u>Name</u>	<u>Date</u>
J. Belete	1960's
B. Belou	1950's-60's
S. Brigulio	Late 1960's-1974
D. Butcher	1960's
E. Carr	1967-71
B. Conley	1967-Mid 70's
M. Dickey	1957-58
R. Dorey	1960's
T. Egan	1956-58
R. Graves	1960's
L. Green	1975-present
_____ Guerin	Late 1960's
J. Harrell	1950's-1960's
L. Hicks	1967-71
D. Higman	1972-present
C. Howard	1951-63
S. Huff	Late 50's-60's
K. LeBlanc	Mid 1960's-1970's
B. Marshall	Late 1960's
J. Marshall	1967-69
M. Olivier	1960-68
N. Pallister	1956-60
J. Peterson	1930's-Mid-1960's

— Prcjean	1967-68
P. Resor	1956-73
C. Rooney	Late 1960's
H. Sanford	Late 1950's-60's
W. Schlesinger	1960's
J. Smith	1965-70
C. Stevens	1940's-60's
E. Turner	1950's-60's
B. Walker	Late 1960's
G. Williams	1956-Early 60's

4979C

MARYLAND

<u>Name</u>	<u>Dates</u>
C. Bell	1946-1948
T. Cahill	1966-1971
A. Capone	1967-1970 1976-1979
T. Cerna	1960's-1970's (Deceased)
T. Cowdrick	1949-1950
C. Demming	1962-1964
J. Devin	Early 1950's
C. F. Dougherty	1976-1978
J. Eckert	1940's-1950's (Deceased)
A. Falvo	1968-1970
J. Gettman	1970's
D. Hamilton	1963-1967
J. Hamilton	1959-1969
J. Hogarath	1970-1975
R. Joynes	1961-1964
J. Kelly	1958-1966
J. Kelly	1972-1976
B. Lentz	1963-1973
R. Lindegard	1960-1964
D. Martin	1959-1965
R. Moririty	1956-1960
G. Murphy	1964-1967
R. Osbourne	1960-1967
J. Palmer	1960's
W. Plogman	1975-1978
D. Rains	1950's

A. Sheffer	1948
P. Simmons	1955-1959
G. Stanton	1963-1967
S. Sword	1959-1967
B. White	1947

4155B
05/25/89

NORTH DAKOTA

<u>Name</u>	<u>Date</u>
W. Alseth	1948-1950
E. Berg	1948-1950
J. Christiensen	early 1970's
R. Dahl	pre-1959
H. Deadman	1938-1942
H. Dower	1946-1969
J. Ehrmantraut	1967-1969
W. England	1934-1937
M. Gaffney	pre-1959
J. Gardner	1953-1957
J. Kinnard	1965-1979
R. Larson	1956-1957
W. Larson	1972-1975
J. Mackin	1930-1944
J. Malm	1958-present
V. McLaughlin	1932-1934 1942-1969
A. Meyer	late 1960's
R. Nolan	1957-1962
H. Nordby	1945-1949
E. O'Brian	1945-1948
R. Olsen	1929-1945
R. Peters	1952-1967
H. Petschel	1956-1957
J. Ranaley	1957-1962
J. C. Robinson	1959-1980
K. Schmidt	1931-1936
P. Shoemaker	1937-1939

P. Splittorff	1952-1957
C. Sprangers	1947
J. Wargler	1966-1967
J. Westgard	pre-1959
F. Williams, Jr.	1951-1952