

**PLAINTIFF'S
EXHIBIT****AL-621**

1 In compliance with Civil Rule 30(b)(6), ALCOA shall designate and
2 produce for testimony one or more officers, directors, managing agents
3 and/or person(s) on its behalf and who have knowledge of facts known
4 or reasonably available to ALCOA concerning the following items:

5 1. Any and all records or other information concerning any and
6 all work performed by Hubert E. Wright at the ALCOA plant in
7 Vancouver, Washington, during the years 1944 through 1971 inclusive,
8 including, but not limited to his work in the Mechanical Maintenance
9 Department and in the "pot" room.

10 2. Any and all records or other information concerning any and
11 all asbestos-containing materials at the ALCOA plant in Vancouver,
12 Washington, during the years 1944 through 1971 inclusive, including,
13 but not limited to, pipecovering and block.

14 3. Details of ALCOA's records retention policy from 1944 until
15 the present, including, but not limited to, specific policy(s)
16 regarding retention of the following records for the years 1944 to
17 1971 inclusive: employee records including, but not limited to, job
18 descriptions and specific job assignments; repair of furnaces and
19 boilers and pipecovering; installation of new furnaces and boilers and
20 pipecovering; specification manuals on any and all boilers; and
21 records reflecting purchase and receipt of asbestos or asbestos-
22 containing products.

23 Plaintiffs specifically request and expect that defendant comply
24 with Civil Rule 30(b)(6).

25 This testimony upon oral examination will be taken on the ground
26 and for all purposes set forth under the Civil Rules; that the said

Notice of Deposition Pursuant
To Civil Rule 30(b)(6) - 2

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SCHROETER, GOLDMARK & BENDER, P.A.
ATTORNEYS AT LAW500 Central Building • 810 Third Avenue
Seattle, Washington 98104
(206) 622-8000

1 witness will give evidence material to the establishment of the
2 plaintiffs' case.

3 DATED this 4th day of April, 1994.

4 SCHROETER, GOLDMARK & BENDER

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6 
7 WILLIAM RUTZICK
8 Counsel for Plaintiffs
9 Bar Membership No. 11533
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Notice of Deposition Pursuant
To Civil Rule 30(b)(6) - 3

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TOTAL P.05