PLAINTIFF'S EXHIBIT
USG-305

IN RE: ASBESTOS LITIGATION	§	IN THE DISTRICT COURT OF
	§	
	§	CAMERON COUNTY, TEXAS
	§	
	§	

DEFENDANT UNITED STATES GYPSUM COMPANY ANSWERS TO PLAINTIFFS' MASTER INTERROGATORIES

COMES NOW, UNITED STATES GYPSUM COMPANY, Defendant in the above-styled and numbered cause (hereinafter referred to as "Defendant"), pursuant to the Texas Rules of Civil Procedure files this their Responses to Plaintiffs' Master Interrogatories as follows:

GENERAL OBJECTIONS

1. Defendant objects to each interrogatory and request for production and part thereof to the extent that Plaintiffs may assert that Plaintiffs definitions for words are binding on defendant or purport to impose upon Defendant obligations beyond those imposed by the rules of civil procedure.

2. Defendant objects to each interrogatory and request for production in part thereof to the extent it calls for answers disclosing information protected by (a) the attorney-client privilege, (b) the attorney work product doctrine, (c) any applicable privilege relating to communications between counsel for defendant and counsel for other defendants in this or other cases regarding defense of the case, (d) any applicable privilege relating to communications between defendants employees counsel and defendant insurers regarding the defense of this claim or claims of this type, (e) any privilege relating to confidential trade secrets, proprietary information or confidential communications with any government agency, (f) the expert witness exemption, (g) the witness statements exemption, (h) the party communications exemption, (i) the right of privacy or (j) any other privilege.

3. Defendant objects to each interrogatory and request for production and part thereof to the extent that information sought is neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence as it relates to defendant.

4. Defendant objects to each interrogatory and request for production and part thereof to the extent that it seeks information not within the custody and control of Defendant.

5. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks to require answers or information, or require identification of documents, or impose obligations beyond those permitted by the applicable rules of Civil Procedure and local rules of court.

6. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks information in a form different from that maintained by Defendant in the ordinary course of its business.

7. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks information concerning or contained in documents which it objects to providing.

8. Defendant objects to each interrogatory and request for production in part thereof to the extent that it seeks to impose on Defendant a discovery obligation to respond for Defendants' businesses and entities not parties to this litigation.

9. Defendant objects to each interrogatory and request for production and part thereof as unreasonable, unduly burdensome, expensive, harassing, annoying, overly broad, vague, and ambiguous given the needs and parameters of this case. First, because Defendant is a company employing many people it would be practically impossible to inquire of all Defendants' officers, directors, employees, or partners about their individual knowledge. Second, the requests seek information about products which were never sold in Texas and about products which the plaintiffs never would have worked with or around and which the plaintiffs would never have been exposed. In this regard, the requests are not reasonably calculated to lead to the discovery of admissible evidence and are irrelevant. The following responses are limited to asbestos bearing products which could have reached the geographic areas of Texas, Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, and Virginia.

10. Defendant objects to each interrogatory and request for production or part thereof that seeks to determine the knowledge, familiarity, or awareness of defendant. It is not possible to state precisely if or when a corporation can be said to have such knowledge; that is a mixed question of fact and law. Defendant objects to imputing knowledge, familiarity or awareness of an employee or employees or agent or agents of defendant.

11. Defendant objects to each interrogatory and request for production unless Plaintiff identify a product injuring them for which Defendant is responsible.

12. Defendant objects to the definitions "Defendant", "You", "Your", "Your company", "Predecessors", "Subsidiaries" these definitions are overly broad, vague, ambiguous, unduly burdensome, harassing, annoying, unnecessarily expensive, and not reasonably calculated to lead to the discovery of admissible evidence.

13. Defendant answers these requests for production on behalf of itself with information developed after a reasonable investigation into the relevant facts. The objections stated above are incorporated by reference in each response herein as if fully set forth below. No such objection is waived by answering a request for production in whole or in part. Any response provided herein is subject to and limited by all objections raised and all objections as to admissibility and all such objections are hereby expressly reserved and may be interposed at any time.

PREFATORY STATEMENT

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

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

OBJECTIONS

U.S. Gypsum objects to the manner in which plaintiff has defined U.S. Gypsum to the extent that plaintiff purports to include in its definition of U.S. Gypsum "the corporate Defendant separately answering these Interrogatories, and any of its merged, consolidated or

acquired predecessors, divisions, subsidiaries, foreign subsidiaries, foreign subsidiaries of predecessors, and/or affiliated known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products or that incorporated asbestos or asbestos-containing products into ships or other water-going vessels. This definition includes present and former officers, directors, agents, employees and all other persons acting or purporting to act on behalf of the corporate Defendant or its predecessors, subsidiaries and/or affiliates known to have mined, manufactured, sold, marketed or distributed asbestos or asbestos-containing products. 'Predecessors' further means any business firm, whether or not incorporated, which had all or some of its assets purchased by you or came to be acquired by you whether by merger, consolidation or otherwise known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products. 'Subsidiaries' further means any business firm, whether or not incorporated, which is or was in any way owned or controlled, in whole or in part by Defendant or its predecessors and which is know to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products." In that U.S. Gypsum Company is the named defendant, this definition is overly broad and would require U.S. Gypsum to engage in unduly burdensome research, divulge privileged information and produce privileged documents. This defendant, United States Gypsum Company, responds to these Interrogatories and Requests for Production on behalf of itself.

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

documents.

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

RESPONSES TO PLAINTIFFS INTERROGATORIES

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles or jobs held when working for Defendant of each person who has supplied any information used in answering these Interrogatories.

ANSWER:

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

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of

Texas.

ANSWER:

2. Yes. United States Gypsum Company; Delaware; 125 S. Franklin Street, Chicago, Illinois 60606. The agent authorized to accept service of process for this defendant for the State of Texas is CT Corporation System, 1601 Elm Street, Dallas, Texas 75201 and CT Corporation System, 811 Dallas Avenue, Houston, Texas 77002. This defendant has had a license to do business in Texas since 1923.

INTERROGATORY NO. 3:

Has defendant or any of its predecessors or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Cameron County asbestos litigation.

ANSWER:

3. This defendant has never mined or sold raw asbestos. In addition, see this defendant's response to Interrogatory No. 4.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER:

4. See attached Schedule D. In addition, U. S. Gypsum manufactured colored exterior stucco for National Gypsum Company from the 1940's to the 1970's. This was resold under National Gypsum's Gold Bond label. U. S. Gypsum possesses documents which indicate that it was authorized to manufacture exterior finish stucco for the following companies who sold it under their company label: National Brickstone, early 1960's; Brickstone International, early 1960's to early 1970's; Temple Brick Corporation, mid-1960's.

U. S. Gypsum manufactured a wallboard adhesive in the 1970's for National Gypsum Company that was resold under National Gypsum's Gold Bond label. U. S. Gypsum may have manufactured other adhesives for resale during the 1970's, but it has been unable to verify such production.

U. S. Gypsum manufactured a high temperature block insulation product for A. P.

Green Refractories Company for an eighteen month period in 1970 and 1971.

Further, U. S. Gypsum manufactured SprayDon Fireproofing from 1966 to 1971 for the Sprayon Research Corporation. Those products were sold and distributed by Sprayon Research Corporation and Metropolitan Spray, and manufactured according to Sprayon specifications by this defendant.

The above-referenced documents will be made available for plaintiff's inspection through U. S. Gypsum's offices at 125 S. Franklin Street, Chicago, Illinois.

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

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

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at
any time marketed or sold.

ANSWER:

5. See this defendant's response to Interrogatory No. 4.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

(a) As to each product, state whether such product was mined, manufactured, marketed and/or sold.
(b) The names of the companies mining, manufacturing, marketing and/or selling each product mined, manufactured, marketed and/or sold.
(c) The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
(d) The date each of the named products was placed on the market.
(e) A description of the physical (chemical) compositions of each of the named

products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.

(f) The date each of the products was removed from the market and no longer sold or distributed and the reason or reasons therefor.

(g) The date asbestos was removed from such products, if ever, and the reasons therefor.

(h) A description of the physical appearance of each of the named products.

(i) A detailed description of the intended uses of the named products.

(j) Identify the last year that you sold each asbestos-containing product.

ANSWER:

6. (a) Objection, this interrogatory is overly broad, ambiguous, unduly burdensome, unnecessarily expensive, harassing, annoying, and not reasonably calculated to lead to the discovery of admissible evidence. This defendant never mined raw asbestos. See this defendant's response to Interrogatory No. 4.

(b-d) See this defendant's response to Interrogatory No. 6 (a).

(e) Objection. This defendant objects to "a description of the physical (chemical) compositions of each of the named products" on the grounds of confidential trade secrets. Without waiving this objection, chrysotile was the "type of asbestos" used in virtually all U. S. Gypsum Company products that contained asbestos. U. S. Gypsum now understands that amosite asbestos may have been used as a component ingredient in rigid block insulation products manufactured at its Greenville, MS plant from 1966 - 1971.

Furthermore, see attached Exhibit No. 1.

(f-g) See attached Exhibit No. 2.

(h) See Exhibit No. 3. In addition, this information may be derived from operating bulletins and research reports which are regularly maintained business records of United States Gypsum Company. The burden of deriving or ascertaining the answers is substantially the same for the party serving these interrogatories as it is for United States Gypsum Company. Accordingly, United States Gypsum Company will afford plaintiff the opportunity to examine the relevant operating bulletins and research reports at a mutually convenient time through its offices at 125 South Franklin Street, Chicago, Illinois.

Some of these documents contain confidential research, developments and commercial information. Accordingly, the relevant research reports will be made available for plaintiff's inspection and copying only pursuant to an appropriate Confidentiality Stipulation and Protective Order, through United States Gypsum Company's offices at 125 South Franklin

Street, Chicago, Illinois.

(i-j) See this defendant's response to Interrogatory No. 4.

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

(a) A description of each such document.

(b) The name, address and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER:

7. Objection, the request is overly broad, vague, ambiguous, unduly burdensome, unnecessarily expensive, harassing, annoying, and seeks information protected by confidential proprietary information and trade secrets. This information may be derived from operating bulletins and research reports which are regularly maintained business records of United States Gypsum Company. The burden of deriving or ascertaining the answers is substantially the same for the party serving these interrogatories as it is for United States Gypsum Company. Accordingly, United States Gypsum Company will afford plaintiff the opportunity to examine the relevant operating bulletins and research reports at a mutually convenient time through its offices at 125 South Franklin Street, Chicago, Illinois.

Some of these documents contain confidential research, developments and commercial information. Accordingly, the relevant research reports will be made available for plaintiff's inspection and copying only pursuant to an appropriate Confidentiality Stipulation and Protective Order, through United States Gypsum Company's offices at 125 South Franklin Street, Chicago, Illinois.

INTERROGATORY NO. 8:

Before distributing, selling or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos contained in those products? If the answer is affirmative, state:

(a) The names of the products tested and the date of each test.

(b) The name, address, and job title of each person conducting the tests or involved with conducting the tests.

(c) The results of the tests.

ANSWER:

8. Objection. This Interrogatory is overbroad, burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, and is not limited to testing with respect to asbestos only, the focus of this litigation. Without waiving this objection, U.S. Gypsum has conducted a number of studies which relate to its asbestos-containing products and which concern various performance parameters of those products.

INTERROGATORY NO. 9:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

(a) A description of each such document.

(b) The name, address and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER:

9. Objection. This interrogatory is overbroad in that it is not limited to asbestos, the focus of this litigation. Without waiving this objection, see this defendant's response to Interrogatory No. 6 and Interrogatory No. 7.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests describe in response to Interrogatory No. 8? If the answer is affirmative, state:

(a) The trade names of the products changed.

(b) The nature of the changes made and the date of such changes or modifications.

(c) The name, address and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER:

10. See this defendant's response to Interrogatories No. 6, 7, and 9.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative,

state:

(a) The-names of the products tested and the dates of such tests.
(b) The name, address and job title of each person who conducted those tests.
(c) The results of those tests.
(d) Whether, as a result of the tests, any products were removed from the market.
(e) The names of all products removed from the market as a result of these tests.

ANSWER:

11. Objection. This Interrogatory is overbroad, burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence, and is not limited to testing with respect to asbestos only, the focus of this litigation. Without waiving this objection, see Defendant's response to Interrogatory No. 6. U.S. Gypsum has conducted a number of studies which relate to its asbestos-containing products and which concern various performance parameters of those products.

U.S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications recommendations, blueprints or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

(a) The name of each product.
(b) A description of each document and how it relates to each product.
(c) The name, address and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER:

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

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 10 or 13? If the answer is affirmative, state:

(a) The-names of the products changed or modified.
(b) The name, address and job title of each person responsible for having made a change or modification.
(c) The nature of the hazard or defect which resulted in such change or modification.

ANSWER:

13. See this defendant's response to Interrogatory No. 10.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material of any kind or character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

(a) The names of each relevant product.
(b) The exact wording of each warning statement on each printed material.
(c) A description of the printed material other than the warning statement.
(d) The method used to distribute the warning to persons likely to use the product.
(e) The date each warning was first issued, distributed or placed on packaging.
(f) The name, address and job title of each person responsible for having drafted or issued the warning.
(g) The current location of any such printed material and the custodian thereof.
(h) The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER:

14. (a-e) See attached Exhibit No. 4. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

(f) J. D. Cornell, Manager Corp., Occ. Safety and Health; C. M. Howard, Product Manager Joint Treatment and Textures; R. H. Entz, (deceased); C. P. Kipp (deceased); C. C. Gramer (deceased) and perhaps others. Discovery continues.

(g-h) U. S. Gypsum maintains no central repository for the accumulation of the requested information in the ordinary course of business. Documents that have already been identified and gathered to respond to discovery requests in other litigation and that relate to products which plaintiff can establish are relevant to this litigation, will be made available for inspection at a mutually convenient time through U. S. Gypsum's offices at 125 South Franklin Street, Chicago, Illinois.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those plaintiffs who have filed personal injury actions in Texas State Courts is or are

claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

(a) The name and address of each claimant.
(b) The date of notice of each claim.
(c) A description of the claim.
(d) The type of injuries allegedly sustained.
(e) The name and address of each attorney who represents each individual making a claim.
(f) The style and court number of each claim.
(g) The disposition of each claim that has been settled or taken to judgment.

ANSWER:

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

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER:

16. See this defendant's response to Interrogatory No. 4.

INTERROGATORY NO. 17:

Did you or any of your predecessors, successors or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Arkansas, Texas and Virginia? If so, state:

(a) The name and address of each such distributor or sales representatives.
(b) The years in which such company or person distributed, marketed or sold your products.
(c) What products were distributed, marketed or sold and in what years.

ANSWER:

17. With respect to this defendant's distributors, 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. With that limitation, U.S. Gypsum responds as follows: Prior to 1966, U.S. Gypsum sold its construction products, some of which may have contained small amounts of asbestos, exclusively through independent dealers.

Beginning in about 1966, U.S. Gypsum sold its construction products either directly to independent contractors, independent distributors or, as had previously been the custom, through independent dealers.

This defendant has no sales records for the years prior to 1965, other than records of gross sales of individual products by plant. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time at 125 South Franklin Street, Chicago, IL 60606.

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

With respect to this defendant's sales representatives, objection. This Interrogatory is overbroad, irrelevant, immaterial, and is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER:

18. U. S. Gypsum's Chief Medical Officers:

C. A. Hedblom, M.D., 101 South Wacker Drive, Chicago, Illinois, 1974 to 8-31-89 (retired).

W. Highstone, M.D. - 1939 to 1974 (deceased).

In addition, U. S. Gypsum retained or consulted "outside doctors" who provided services to its employees. See attached Exhibit No. 5.

This defendant employed F. Tremmel as an industrial hygienist from August 4, 1986 to June 21, 1988. He was succeeded in that position by R. P. Musselman, Corporate Toxicologist. Prior to August 4, 1986, this defendant did not employ a certified industrial hygienist.

This defendant employed H. Lawton as an industrial hygienist from 8/17/87 to 12/90 and H. C. Brown as an industrial hygienist from 9/28/87 to 11/90.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written material of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

(a) The name of each such publication.
(b) The date of publication and the names of the author and publisher (if any).
(c) The-date received by Defendant, if known.
(d) The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER:

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

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiaries or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

(a) The name and address of each such association or organization.
(b) The dates during which Defendant or any of its subsidiaries or predecessors were members.
(c) The names and dates of any publications, minutes, or reports published, written or disseminated by any of the named associations or organizations.
(d) Whether any of those publications are still in your possession, and if so:
    (i) A description of the publications, including the date.
    (ii) The current location of such publications.
    (iii) The custodian of such publications.
    (iv) The method or manner in which such publications are maintained.

ANSWER:

20. See attached Exhibit No. 6. In addition, non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to interrogatory Nos. 3-6 were manufactured, assembled or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER:

21. See attached Schedule D.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

(a) The name, address and job title of each person or entity who prepared such materials.
(b) The name, address and job title of each person who currently has possession of such materials and their present location.
(c) The date the materials were prepared.
(d) The media used to disseminate the sales materials.

ANSWER:

22. (a-c) U. S. Gypsum maintains no central repository for the accumulation of the requested information in the ordinary course of business. Documents that have already been identified and gathered to respond to discovery requests in other litigation and that relate to products which plaintiff can establish are relevant to this litigation, will be made available for inspection at a mutually convenient time through U. S. Gypsum's offices at 125 South Franklin Street, Chicago, Illinois.

(d) See attached Exhibit No. 7.

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

(a) The name, address and job title of each person who prepared such materials or instructions or assisted in their preparation.
(b) The name, address and job title of each person who currently has possession of

such materials or instructions and their present location.

(c) The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.

(d) The year each such written material or instruction was prepared and disclosed to potential customers.

ANSWER:

23. All packaging contained the product name, this defendant's name, directions and instructions for use. Non-privileged, responsive documents, to the extent they exist, will be made available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER:

24. See attached Exhibit No. 8.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

(a) The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

(b) How Defendant became aware of the existence of the disease.

(c) Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease and/or of asbestos exposure.

(d) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.

(f) Who is the custodian of such information.

(g) The date on which you first received knowledge or information that asbestosis was caused by inhalation of asbestos fibers.

ANSWER:

25. 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. Further, this Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer. Without waiving these objections. see attached Exhibit No. 9.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

(a) The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

(b) How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.

(c) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(d) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in written form.

(f) Who-is the custodian of such information.

(g) The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.

ANSWER:

26. 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. Further, this Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer. Without waiving these objections. see attached Exhibit No. 9.

INTERROGATORY NO. 27:

As to the pleural disease, pleural thickening or pleural plaques, state:

(a) The date on which Defendant or its subsidiary or predecessor learned that such disease was caused by inhalation of asbestos fibers by humans.

(b) How Defendant or its subsidiary became aware of the disease and that it was caused by exposure to asbestos.

(c) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(d) What information was disseminated within Defendant's company or its

subsidiary or predecessor regarding such adverse consequences or effects.

(e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(f) Who is the custodian of such information.

ANSWER:

27. 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. Further, this Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer. Without waiving these objections. see attached Exhibit No. 9.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

(a) The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.

(b) The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.

(c) How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.

(d) Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.

(e) What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(f) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form..

(g) Who is the custodian of such information.

(h) Whether Defendant agrees that there is no known medical cure for mesothelioma.

ANSWER:

28. 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. Further, this Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer. Without waiving these objections. see attached Exhibit No. 9.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer,

state:

(a) The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.

(b) What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers.

(c) The date on which Defendant first suspected other cancers were caused by asbestos inhalation.

(d) Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.

(e) What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.

(e) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.

(f) Who is the custodian of such information.

ANSWER:

29. 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. Further, this Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer. Without waiving these objections. see attached Exhibit No. 9.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain, in detail, and attach any studies or surveys on which this answer is based.

ANSWER:

30. Objection. U.S. Gypsum objects to this Interrogatory on the ground that is poses a hypothetical question without establishing the conditions that should be assumed in answering the Interrogatory. Additionally, the Interrogatory is objectionable because it seeks an expert opinion. Also, the interrogatory is overly broad, vague, ambiguous, unduly burdensome, harassing, annoying, and unnecessarily expensive. The question also seeks irrelevant information.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its

subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER:

31. See attached Exhibit No. 10.

INTERROGATORY NO. 32:

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state as to each such agreement:

(a) The name of the company manufacturing the asbestos products.
(b) The trade name affixed to those products.
(c) The periods of time covered by each such agreement.
(d) The volume, in dollar amount, of each transaction.
(e) The initial purchaser of the products.

ANSWER:

32. U. S. Gypsum manufactured colored exterior stucco for National Gypsum Company from the 1940's to the 1970's. This was resold under National Gypsum's Gold Bond label. U. S. Gypsum possesses documents which indicate that it was authorized to manufacture exterior finish stucco for the following companies who sold it under their company label: National Brickstone, early 1960's; Brickstone International, early 1960's to early 1970's; Temple Brick Corporation, mid-1960's.

U. S. Gypsum manufactured a wallboard adhesive in the 1970's for National Gypsum Company that was resold under National Gypsum's Gold Bond label. U. S. Gypsum may have manufactured other adhesives for resale during the 1970's, but it has been unable to verify such production.

U. S. Gypsum manufactured a high temperature block insulation product for A. P. Green Refractories Company for an eighteen month period in 1970 and 1971.

Further, U. S. Gypsum manufactured SprayDon Fireproofing from 1966 to 1971 for the Sprayon Research Corporation. Those products were sold and distributed by Sprayon Research Corporation and Metropolitan Spray, and manufactured according to Sprayon specifications by this defendant.

The above-referenced documents will be made available for plaintiff's inspection through U. S. Gypsum's offices at 125 S. Franklin Street, Chicago, Illinois.

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

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

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER:

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

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

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessors currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory no. 32? If the answer is affirmative, state:

(a) The name, address and job title of each person having custody of each of those documents and their current location.

(b) A brief description of each such document, including the dates and the parties signatory.

ANSWER:

34. Non-privileged, responsive documents, to the extent they exist, will be made

available to plaintiff at a mutually convenient time through U.S. Gypsum Company's offices at 125 South Franklin Street, Chicago, IL.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide:

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

ANSWER:

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

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

(a) The dates of each such meeting.
(b) The general subject matter discussed at each meeting.
(c) Who was in attendance at each meeting.
(d) Where and by whom the written minutes are presently maintained.
(e) By whom the minutes were taken and put into final format.
(f) Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER:

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

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

(a) As to each product, whether such product is mined, manufactured and/or marketed or sold.
(b) The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
(c) The trade or brand name of each of those products mined, manufactured, marketed and/or sold.
(d) The date each of the named products was placed on the market.
(e) A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
(f) A description of the physical appearance of each product and its packaging.
(g) A detailed description of the intended uses of the named products.
(h) Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER:

37. No.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

(a) The location of such documents.
(b) The name and address of the custodian of the documents.
(c) The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
(d) In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER:

38. Objection. This Interrogatory is overbroad in scope of time. This defendant discontinued manufacturing products with asbestos as part of their formulations in 1977. Inquiries into years subsequent to 1977 will not lead to the discovery of admissible evidence. Without waiving this objection, 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. With that limitation, U.S. Gypsum responds as follows: Prior to 1966, U.S. Gypsum sold its construction products, some of which may have contained small amounts of asbestos, exclusively through independent dealers. Beginning in about 1966, U.S. Gypsum sold its construction products either directly to independent contractors, independent distributors or, as had previously been the custom, through independent dealers.

This defendant has no sales records for the years prior to 1965, other than records of gross sales of individual products by plant. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time at 125 South Franklin Street, Chicago, IL 60606.

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

INTERROGATORY NO. 39:

Will you call company representatives as witnesses at the trial of any of these cases? If so, list:

(a) The name, address and job title of each company representative who may be called.

(b) A summary of the testimony expected to be given by each such witness.

(c) List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.

ANSWER:

39. Objection the interrogatory is exceeds the scope of permissible discovery pursuant to T.R.C.P. in that T.R.C.P. only permit parties to ask other parties whom they may call as witnesses. Also, the question seeks information protected by the work product exemption. Further, the question is overly broad, unnecessarily expensive, harassing, and annoying. Subject to the foregoing objections, Defendant incorporates herein by reference Defendant's List of Potential Witnesses, Designation of Deposition Testimony, and Designation of Expert

Witnesses (which includes all supplements designations), all filed or to be filed in this case.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, process, distributed or contracted or supplied products containing asbestos? If so, for each such entity, state:

(a) Full and correct name;
(b) Principal place of business;
(c) State of incorporation;
(d) Date of acquisition by Defendant;
(e) Whether or not the business entity was ever authorized to transact business in the State of Texas.

ANSWER:

40. Objection. This defendant does not understand the term "process" and therefore cannot form a meaningful response as to whether it "processed" asbestos. Without waiving this objection, United States Gypsum Company acquired the assets of National Asbestos Manufacturing Company in 1936. National Asbestos Manufacturing Company was located in New Jersey and no longer exists as a corporate entity. Said company was a producer of asbestos-containing pipecovering. The National Asbestos Pipe Covering Line was only produced for three years. National Asbestos Manufacturing Company was incorporated July 24, 1919 in the State of New Jersey.

United States Gypsum Company acquired A. P. Green of Missouri in 1966. A. P. Green is located in Mexico, Missouri, and is no longer affiliated with United States Gypsum Company. Said company is primarily a manufacturer of refractory products. A small percentage of the products it manufactured or sold contained asbestos as part of their formulations. A. P. Green was incorporated under Missouri law as A. P. Green Fire Brick Company on December 4, 1915.

United States Gypsum Company acquired Chicago Mastic Company, a manufacturer of adhesives, in 1971. Said company was acquired by purchase of stock. Chicago Mastic Company was incorporated in the State of Illinois on March 30, 1950.

In 1974, Permalastic Products Company, a wholly-owned subsidiary of U. S. Gypsum Company, acquired the assets of a division of Firestone Tire and Rubber Company used in the manufacture of asbestos-containing adhesives.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after
sale or distribution and before reaching the user.

ANSWER:

41. This defendant's insulation products were packaged to minimize damage in transport; however, the products may have been altered or modified by others before reaching the parties named in this Interrogatory.

With respect to how this defendant's products were altered after their sale, plasters, fireproofing, acoustical material, asbestos cements and joint compounds (except for ready mixed formulations) had to be mixed with water at the jobsite. Pipecovering and rigid block insulation may have been cut or molded at the jobsite. Some adhesives had to be mixed with water at the jobsite.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinists, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendant's asbestos-containing products.

ANSWER:

42. 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. This defendant further objects to this Interrogatory on the basis that it is vague, unclear, and the term therein such as "helper" is undefined. Therefore, this defendant is unable to formulate a meaningful response.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

(a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.

(b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are

TO: #147-2, Mr. C. M. Howard, Jr. July 26, 1973

FROM: #149, Mr. J. T. Allen, Jr.

SUBJECT: Our File PL/WDLL/G - Westinghouse Corp. Request for OSHA Certification

We have received your memorandum of July 23, 1973 concerning the above matter. We attach the March 27, 1973, memorandum of Mr. Weidman concerning customer demands for OSHA certifications. The considerations outlined in that memorandum have not changed. Accordingly, the Legal Department could not approve the certification requested by Westinghouse.

However, it would be possible to draft a certification with respect to asbestos content in DURABOND. If you desire this, and Westinghouse will accept something along this line, we will be pleased to prepare a draft.

JTAjr:sn
Att.
cc: #147-2, Mr. R. P. Entz
#151, Mr. K. S. Freeman
#151, Mr. E. Maynard
#170-5, Mr. J. R. Milstead
#991-P, Mr. G. F. Kulick

RECEIVED
JUL 27 1973
U. S. GYPSUM CO.
RESEARCH CENTER

PLAINTIFF'S EXHIBIT
USG 298

LB001 0470

referring to and the specific products you are referring to and year involved.

ANSWER:

43. Objection. This Interrogatory as phrased is vague, ambiguous, and calls for the testimony of an expert witness. Without waiving this objection, this defendant has not found any information in its records sufficient to enable it to answer this Interrogatory. Its investigation into the subject matter referred to in this Interrogatory is continuing. However, this defendant's asbestos-containing pipe covering (manufactured from 1936 to 1938) and block was a premolded, rigid product which was not intended or required to be molded or mixed in application. It was manufactured in standard premolded shapes and sizes intended to minimize cutting of pieces in application. It appears that the product was applied by methods including gluing, tying it to the pipe, strapping it to the pipe, or wiring it to the pipe.

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped or replaced at some time after installation?

ANSWER:

44. Objection. This Interrogatory is vague and ambiguous. Furthermore, there has been no allegation that plaintiffs herein were involved in removing, stripping or replacing asbestos-containing products manufactured by this defendant. Therefore, 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 states that it would be foreseeable that any construction product or material might be subject to removal or replacement.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER:

45. Not to this defendant's best current knowledge, information and belief. This defendant is aware that some of its employees visited job sites to observe application of all of this defendant's products and to answer questions of those using said products.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER:

46. See this defendant's response to Interrogatory No. 45.

INTERROGATORY NO. 47:

Has your company or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

(a) Name of the person or firm conducting such studies.
(b) The date the studies began and the date they were completed.
(c) Any publication or other written dissemination of the results of the studies.
(d) The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

ANSWER:

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

INTERROGATORY NO. 48:

Does you company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and
whether or not such Research Department has operated continuously since being established. State also:

(a) The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
(b) What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?
(c) State in detail the purposes, duties and responsibilities of such Research

Department.

ANSWER:

48. This defendant has had a Research Department since 1921. The Research Department has never operated solely for the research and development of asbestos-containing products. No medical research is performed by this Department. Directors of the Research Department have been as follows:

C. K. Roos (deceased)
H. Huntzinker (retired)
J. Robertson (deceased)
C. M. Lambe (deceased)
M. L. Bartling, Jr. (retired)
Dr. J. W. Zabor (retired)
J. N. Walker (retired)
B. W. Burrows
125 South Franklin Street
Chicago, IL 60606

INTERROGATORY NO. 49:

Does your company have, or has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

(a) The year such Medical Department was established.
(b) Whether or not such Medical Department has operated continuously since being established.
(c) The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each.
(d) State the duties and responsibilities of such Medical Department.

ANSWER:

49. (a-c) See this defendant's response to Interrogatory No. 18.

(d) The Medical Director operated a medical facility in Company general offices; conducted and managed a medical program; and furnished counsel as required to assure the health and well being of Company employees.

Medical Director reported to the Vice President of Personnel.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing

product or on their packaging? If so, identify the product(s) and year said warning was first applied.

ANSWER:

50. See attached Exhibit No. 4.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER:

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

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER:

52. Objection.This Interrogatory is overbroad in that it is not limited to products containing asbestos, the focus of this litigation. The interrogatory is also vague and ambiguous and seeks irrelevant information.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

(a) All details of such recall.
(b) The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should take place.
(c) The dates of recall.
(d) The purpose for the recall.

ANSWER:

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

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER:

54. Objection. This Interrogatory is overbroad in that it is not limited to products containing asbestos, the focus of this litigation.

INTERROGATORY NO. 55:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER:

55. See this defendant's response to Interrogatory Nos. 52 and 54.

INTERROGATORY NO. 56:

Did your company or its predecessor(s) or subsidiaries ever make, order or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER:

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

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

(a) The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations.
(b) The name of the employee or official of the company receiving such advice.
(c) How Defendant received notice of such limits or concentrations.

ANSWER:

57. Objection. This defendant objects to this Interrogatory on the ground that it is vague and ambiguous. Furthermore, this defendant objects to this Interrogatory on the ground that it is overbroad insofar as it relates to dust in general. Without waiving these objections, to the extent this Interrogatory seeks to determine whether this defendant was ever directly advised of threshold limit values concerning asbestos dust by the American Conference of Governmental Industrial Hygienists, this defendant has no record of having been contacted by that organization regarding such limits.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 63 for total dust, and not asbestos dust alone?

ANSWER:

58. See this defendant's response to Interrogatory No. 57.

INTERROGATORY NO. 59:

State in detail what tests, if any, Defendant ever made with regard to the quantity, quality or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

ANSWER:

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

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness that you expect to call during trial of these cases. Please designate with specificity the expert witnesses you may call, including:

(a) The name, address, and job classification of each such expert witness.

(b) The subject matter on which the expert is expected to testify.

(c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

(d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report.

(e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above.

(f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER:

60. Objection the interrogatory is overly broad given the parameters and subject matter of this case. Further objecting, the information requested is not relevant. Also, the interrogatory exceeds the scope of permissible discovery under T.R.C.P. 166b(2)(e) and 166b(3). Further objecting, the question seeks information already in the possession of Plaintiffs, or the reason any such information is not already in the possession of Plaintiffs is because Plaintiffs did not timely provide information and materials to Defendant in a timely manner. Subject to the foregoing objections, defendant incorporates herein by reference Defendant's List of Expert Witnesses and Defendant's Designation of Deposition Testimony (including all supplements), all filed or to be filed in this case.

INTERROGATORY NO. 61:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendants agents, having knowledge of facts relevant to this case involving, but not limited to:

(a) Identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.

(b) Each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;

(c) The negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or

damages.

(d) Each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER:

61. Objection the interrogatory is overly broad, vague, ambiguous, unnecessarily expensive, harassing, and annoying. Objection the question seeks irrelevant information and information protected by the work product exemption. Objection the Interrogatory exceeds the scope of permissible discovery pursuant to T.R.C.P. 166b. Subject to the foregoing objections, Defendant reserves the right to supplement this answer, subject to all objections now raised or that can be raised if information later becomes available. Defendant incorporates herein by reference Defendant's List of Potential Witnesses, Designation of Deposition Testimony, and Designation of Expert Witnesses (which includes all supplements designations), all filed or to be filed in this case.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER:

62. Objection this interrogatory is overly broad, vague, ambiguous, unduly burdensome, unnecessarily expensive, harassing, and annoying. Objection the question seeks information protected by the work product, witness statements, party communications, and expert exemptions of T.R.C.P. 166b and the attorney-client privilege of T.R.C.E. 503. Subject to and without waiving the foregoing objections, Defendant incorporates herein by reference Defendant's Designation of Exhibits, Deposition Testimony, Potential Fact Witnesses and Expert Witnesses (including all supplemental designations) filed or to be filed in this case. Defendant incorporates herein by reference all responses to discovery served by all Plaintiffs in this case. Defendant expressly reserves the right to use all documents covered by all authorizations and releases Defendant(s) has/have requested Plaintiff(s) to provide to Defendant(s). Defendant expressly reserves the right to use all documents filed, designated or relied upon by other Defendants or by Plaintiffs in this case.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval

vessels", published in January, 1946 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

(a) Identify the name and position of the employee or officer who received same.
(b) Please produce all documents generated by Defendant which discusses or in any way references the "Fleischer Drinker" study prior to 1968.
(c) Please produce all documents upon which your responses above are based.
(d) Please identify the name(s) and addresses(s) of any person(s) who can verify your above response.
(e) Did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander.
(f) If so, please produce every document which evidences in any way that Defendant relied on the Fleischer Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above.
(g) If your answer to 63(e) is yes, when was the first date Defendant relied on the Fleischer Drinker report in whole or in part for the proposition stated in 63(e) above?

ANSWER:

63. To this defendant's best current knowledge, information and belief, this defendant does not have a copy of this article in its Asbestos Litigation Document Repository.

INTERROGATORY NO. 64:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill No. 241, U.S. Public Health Service and authored by W. (c) Dreessen ("the Dreessen Report")?

(a) Identify the name and position of the employee or officer who received same.
(b) Please produce all documents generated by Defendant which discusses or in any way references the "Dreessen" study prior to 1968.
(c) Please produce all documents upon which your responses above are based.
(d) Please identify the name(s) and addresses(s) of any person(s) who can verify your above response.
(e) Did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander.
(f) If so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory No.64(a) above.
(g) If your answer to 64(e) is yes, when was the first date Defendant relied on the

Dreessen report in whole or in part for the proposition stated in 64(e) above?

ANSWER:

64. This defendant has a copy of this document in its Asbestos Litigation Document Repository. However, this defendant cannot ascertain whether a copy of this document was received contemporaneously to its publication.

INTERROGATORY NO. 65:

Please identify documents or things, including x-rays, MRIs, CT-scans or other materials which will be used at time of trial (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER:

65. See General Objections and Preliminary Statement, if any, which are incorporated herein as if fully rewritten. Objection to the extent the request seeks information protected by the (a) attorney-client privilege, (b) the attorney work product doctrine, (c) any applicable privilege relating to communications between counsel for defendant and counsel for other defendants in this or other cases regarding defense of this case, (d) any applicable privilege relating to communication's between defendant's employees or counsel and defendant's insurers regarding the defense of this claim or claims of this type, (e) any privilege relating to confidential trade secrets, proprietary information or confidential communications with any government agency, (f) the expert witness exemption, (g) the witness statements exemption, (h) the party communications exemption, (i) the right of privacy, or (j) any other privilege. Objection to the extent the request seeks information not reasonably calculated to lead to the discovery of admissible evidence. Objection to the extent the request is overly broad, vague, ambiguous, unduly burdensome, unnecessarily expensive, harassing, and annoying.

Respectfully submitted,

DeHAY & ELLISTON, L.L.P.
1500 Maxus Energy Tower
717 North Harwood Street
Dallas, Texas 75201-6508
Telephone: (214) 953-5454
Telefax : (214) 953-5455

By: Kelly C. Caperton
GREG H. BEVEL
State Bar No. 02275800
KELLY C. CAPERTON
State Bar No. 00787199

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been forwarded to Plaintiffs' counsel of record, by hand delivery, on this 29th day of November, 1995.

Kelly C. Caperton
KELLY C. CAPERTON

ASBESTOS-CONTAINING PRODUCTS MANUFACTURED BY U.S. GYPSUM

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

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

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
RED TOP GYPSUM PLASTER (marketed as CEMENT PLASTER until 1967)[7]	Building Plaster	1943	1947	Loveland, CO
		1950	1971	Hagersville, CAN[3]
		1944	1974	Hillsborough, CAN[3]
		1955 only		Montreal, CAN[3]
RED TOP GYPSUM PLASTER FOR MACHINE APPLICATION (marketed as CEMENT PLASTER FOR MACHINE APPLICATION until 1967)[7]	Building Plaster	1961	1966	Detroit, MI
		1961	1966	Gypsum, OH
		1962	1966	Oakfield, NY
		1959 only		Southard, OK[6]
		1957	1972	Hagersville, CAN[3]
		1957	1972	Montreal, CAN[3]
RED TOP TROWEL FINISH	Building Plaster	1930	1935	East Chicago, IN
		1930	1935	Fort Dodge, IA
		1950	1951	Fort Dodge, IA
		1930	1935	Gypsum, OH
		1930	1935	New Brighton, NY
WAINSCOAT TROWEL FINISH	Building Plaster	1946	1953	Fort Dodge, IA
		1946 only		Southard, OK
ORIENTAL INTERIOR FINISH	Building Plaster	1942	1944	Boston, MA
		1942	1972	Fort Dodge, IA
		1942	1944	Gypsum, OH
		1949	1950	Jacksonville, FL
		1942	1946	Milwaukee, WI
		1942	1971; 1972	New Brighton, NY
		1949	1950	Norfolk, VA
		1942	1972	Oakfield, NY

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
		1942	1944	Philadelphia, PA
		1949	1973	Philadelphia, PA
		1942	1973	Sweetwater, TX
ORIENTAL EXTERIOR FINISH STUCCO[7]	Building Plaster	1932	1944	Boston, MA
		1930	1973	Fort Dodge, IA
		1930	1944	Gypsum, OH
		1949	1972	Jacksonville, FL
		1932	1946	Milwaukee, WI
		1930	1972	New Brighton, NY
		1949	1973	Norfolk, VA
		1930	1972	Oakfield, NY
		1932	1944	Philadelphia, PA
		1949	1972	Philadelphia, PA
		1930	1972	Sweetwater, TX
		1964	1974	Montreal, CAN[3]
RED TOP PATCHING PLASTER	Building Plaster	1929	1947	Gypsum, OH
		1942	1951	Milwaukee, WI
		1929	1946	Nephi, UT
		1929	1947	New Brighton, NY
		1944	1947	South Gate, CA
RED TOP COVER COAT FINISH PLASTER	Building Plaster	1948	1964	New Brighton, NY
		1948	1954	Southard, OK
		1956 only		Southard, OK

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

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

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
ACOUSTONE 180	Ceiling	1966	1975	Gypsum, OH
	Tile	1966	1975	Walworth, WI
RED TOP FIRECODE	Fireproofing	1962	1963	Boston, MA[9]
PLASTER	Plaster	1962	1963	Detroit, MI[9]
		1959[10]	1964	East Chicago, IN
		1960	1964	Empire, NV
		1959[10]	1964	Fort Dodge, IA
		1961	1964	Gypsum, OH
		1959[10]	1964	New Brighton, NY
		1962	1963	Oakfield, NY[9]
		1962	1963	Philadelphia, PA[9]
		1961	1963	Sperry, IA
		1962	1963	Stony Point, NY[9]
		1964 only		Hagersville, CAN[3,9]
RED TOP FIRECODE	Fireproofing	1965	1969	Baltimore, MD
"V" PLASTER	Plaster	1962	1963	Boston, MA[9]
		1962	1963	Detroit, MI[9]
		1962	1969[11]	East Chicago, IN
		1962	1969[11]	Empire, NV
		1964	1965	Fort Dodge, IA
		1962	1963	Galena Park, TX[9]
		1962	1968	Gypsum, OH
		1963	1967	Midland, CA
		1962	1969[11]	New Brighton, NY
		1962	1963	Oakfield, NY[9]
		1962	1963	Philadelphia, PA[9]
		1967	1968	Plaster City, CA
		1962	1963	Stony Point, NY[9]
		1963	1969	Sweetwater, TX
		1963	1969[11]	Hagersville, CAN[3]

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
SPRAYDON STANDARD A[12]	Fireproofing Plaster	1965 1967[24] 1970	1971 1971 1971	Plainfield, NJ Torrance, CA Weston, CAN[3]
SPRAYDON STANDARD G[12]	Fireproofing Plaster	1968 1968 1970 only	1970 1970	Plainfield, NJ Torrance, CA Weston, CAN[3]
SPRAYDON POWERCOTE[12]	Thermal Insulation	1969 1969 1969 1970	1971 1971 1971 1971	Plainfield, NJ Torrance, CA Corsicana, TX[13] Weston, CAN[3]
K-FAC INDUSTRIAL INSULATING BLOCK	Rigid Block Insulation	1943	1950	East Chicago, IN
K-FAC 19[14]	Rigid Block Insulation	1970	1971	Greenville, MS
FIRE DOOR COREBOARD[15]	Fire Board	1966	1971	Greenville, MS
COLUMN FIRE BOARD[16]	Fire Board	1966 only		Greenville, MS
SHEETROCK RADIANT HEAT FILLER - MACHINE APPLICATION	Plaster	1968 1969 1968 1969	1971 1971 1971 1971	Baltimore, MD Boston, MA Detroit, MI East Chicago, IN

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
		1970	1972	Empire, NV
		1968	1971	Ft. Dodge, IA
		1969	1971	Gypsum, OH
		1969	1971	New Brighton, NY
		1968	1971	Norfolk, VA
		1969	1971	Philadelphia, PA
		1968	1971	Plaster City, CA
		1969	1970	Shoals, IN
		1969	1972	Sweetwater, TX
PAC-TEX TEXTURE PAINT	Texture	1962	1963	Dallas, TX
		1943	1970	South Gate, CA
		1949	1962	Sweetwater, TX
A-B TEX TEXTURE PAINT	Texture	1959	1973	Chamblee, GA
		1935	1949	Gypsum, OH
		1954	1973	Gypsum, OH
		1973 only		Midway, IL
		1935	1949	New Brighton, NY
		1954	1968	New Brighton, NY
		1943	1944	South Gate, CA
		1954	1974	South Gate, CA
		1948	1950	Sweetwater, TX
		1962	1963	Hagersville, CAN[3]
		1973 only		Hagersville, CAN[3]
TEXTURE PAINT	Texture	1959	1973	Chamblee, GA
		1964	1973	Dallas, TX
		1930	1973	Gypsum, OH
		1937	1973	New Brighton, NY
		1948	1970	South Gate, CA
		1948	1964	Sweetwater, TX

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
TEXOLITE DRY FILL	Texture	1959	1961	New Brighton, NY[17]
TEXOLITE DRYWALL	Texture	1963	1965	Dallas, TX
SURFACER, AGGREGATED,		1961	1977	Gypsum, OH
renamed DRYWALL		1970	1972	Midway, IL
SURFACER, TEXTURE		1963	1965	New Brighton, NY
XII, in 1965		1963	1965	South Gate, CA
SPRAY TEXTURE	Texture	1961	1976	Chamblee, GA
PAINT (or FINISH)		1961	1976	Dallas, TX
		1960	1976	Gypsum, OH
		1970	1976	Midway, IL
		1966	1968	New Brighton, NY
		1957	1973	South Gate, CA
		1959	1961	Sweetwater, GA
MULTI-PURPOSE	Texture	1964	1976	Chamblee, GA
TEXTURE FINISH		1963	1976	Dallas, TX
		1965	1976	Gypsum, OH
		1971	1976	Midway, IL
		1965	1966	New Brighton, NY
IMPROVED SPRAY TEXTURE B-8	Texture	1963	1973	South Gate, CA
SANDED, COLORED	Texture	1952	1953	New Brighton, NY
TEXTURE PAINT		1952	1955	Sweetwater, TX
CONCRETE CEILING TEXTURE	Texture	1970	1973	South Gate, CA
TEXTONE	Texture	1959	1972	Chamblee, GA
TEXTURE FINISH		1962	1972	Dallas, TX

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
		1928	1975	Gypsum, OH
		1937	1972	New Brighton, NY
		1944	1972	South Gate, CA
		1949	1972	Sweetwater, TX
		1965	1977	Hagersville, CAN[3,18]
TEXOLITE BLOCK FILLER		1961	1966	Chamblee, GA
		1966	?	Dallas, TX
		1958	?	Gypsum, OH
		1958	?	New Brighton, NY
		1959	1966	South Gate, CA
		1959	1966	Sweetwater, TX
SHEETROCK SMOOTHCOAT	Texture	1966	1974	Dallas, TX
		1965	1974	Gypsum, OH
		1971	1974	Midway, IL
SHEETROCK RADIANT HEAT SIMULATED ACOUSTICAL TEXTURE	Simulated Acoustical Ceiling Texture	1970	1972	South Gate, CA
SPECIAL TEXTURE PAINT	Texture	1963	1972	Dallas, TX
		1955 only		New Brighton, NY
		1954	1964	Sweetwater, TX
TEXTURE XII, SUPER VINYL	Texture	1970	1976	Gypsum, OH
		1970	1976	Midway, IL
AGGREGATED SPRAY FINISH, WHITE	Texture	1967	1968	Dallas, TX
		1964	1968	Gypsum, OH
		1971 only		Midway, IL

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

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

Product Name	Product Type	First Authorized For Production With Asbestos	Cancellation of Authorization	Manufacturing Locations
THERMALUX RADIANT HEATING PANELS	Radiant Heating Panels	1961	1965	Shoals, IN (assembled)
Other Products (by generic group)				
PIPECOVERINGS, ASBESTOS PAPER, ASBESTOS BOARD		1936	1938[19]	Jersey City, NJ
PASTE SPACKLING PUTTY		1952	1975	Chamblee, GA Gypsum, OH New Brighton, NY Sweetwater, TX
JOINT COMPOUNDS		1920's?	1976	Calgary, CAN[3,20] Chamblee, GA Dallas, TX East Chicago, IN Gypsum, OH Hagersville, CAN[3,20] Jacksonville, FL Midway, IL Montreal, CAN[3,20] New Brighton, NY South Gate, GA Sweetwater, TX
ADHESIVES		1953 1973 1968 1955 1971	1973 1974 1973 1965 1977	Gypsum, OH Midway, IL[16] Nashville, TN New Brighton, NY Rosemont, IL[21]

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

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

[1] At some period of time between 1926 and 1930, Sabinite is believed to have been manufactured at U.S. Gypsum's plant at Arden, Nevada. However, no bulletins for that plant have been located, it having been closed in 1930.

[2] Sabinite may have been produced until this date, but sales diminished substantially by the mid-1950's.

[3] Not sold in the United States.

[4] Two-component Hi-Lite plaster was authorized for production in June 1953 and discontinued in August 1954. Approximately 4 tons of a temporary variant was produced during 1953, and packaged as "Lime-Keene's Acoustical Plaster."

[5] Marketed as Red Top Acoustical Plaster with the word 'Spray' stenciled on the bag from 1954 to 1955; marketed as Red Top Spray On Acoustical Plaster in 1955; marketed as Red Top Audicote Acoustical Plaster from 1955 to 1968.

[6] A trial job of 3 tons only.

[7] Contained less than 1.0% asbestos (not asbestos-containing products under applicable law).

[8] Two month production authorization only.

[9] Temporary production authorization for Firecode only.

[10] Trial jobs were produced in 1959 for tests by Underwriters' Laboratories; regular production commenced in 1960.

[11] As of December of 1969 Firecode V had been dropped from U.S. Gypsum's product line and sales of this product had not been actively solicited by the company for some time. U.S. Gypsum believes that a limited quantity of Firecode V was produced in early 1970 at the East Chicago plant for the completion of a single job already in progress.

[12] Years shown are for actual production. U.S. Gypsum manufactured SprayDon pursuant to the specifications of Sprayon Research Corporation. While Types A and G remained on operating bulletins until 1973, production of G was discontinued in 1970, and A was discontinued on January 1, 1972. Type I, though authorized, was never produced.

[13] From production records.

[14] K-Fac 19 was produced for A.P. Green and packaged and sold by that company under the name INSBLOK. Information contained in plant records suggests that production may have commenced in 1969.

[15] Information contained in plant records suggests that production may have commenced in 1965.

[16] Temporary production authorization only.

[17] Trial job authorized for temporary production only on and off from 1959 to 1961.

[18] Marketed from 1970 to 1977 as Sheetrock Texture Finish Paint in Canada.

[19] Years shown are for actual production. Although authorization to manufacture these products was not cancelled until 1940, the last sales took place in 1938.

[20] Actual Canadian production ceased in 1978.

[21] This product line was manufactured by a company that became a U.S. Gypsum subsidiary in 1971, and records of the production history are incomplete.

[22] Records regarding the production history of this product line are incomplete.

[23] Years shown are for actual production. Though authorized for production until 1978, actual production ceased in 1977.

[24] Years shown are for actual production. Torrance was first authorized to produce SprayDon A in December of 1966, but 302 Reports by plant indicate that Torrance did not start manufacturing SprayDon A until 1967.

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

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

PERCENTAGE OF ASBESTOS (WEIGHT)

ACOUSTICAL PLASTERS PRODUCTS	DATE	PERCENT 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	DATE	PERCENT ASBESTOS
	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.

TEXTURE PRODUCTS	DATE	PERCENT ASBESTOS
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	8.0
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 NC-4	1967 1968	8.0 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 COARSE VERMICULITE	No Change	2.0
IMPERIAL QT COARSE VERMICULITE	1970 1971	5.1 6.1
USG SPRAY TEXTURE R	No Change	1.5
USG CONCRETE CEILING TEXTURE	No Change	6.0
TEXTONE TEXTURE FINISH	1944 1967 1972	2.5 - 4.5 3.5 - 5.5 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%

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*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.

EXHIBT 2

April 9, 1992

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 plan.

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

Product Categories	Reason for Discontinuation	Last Date of Manufacture with Asbestos
* Acoustical Plasters	I	1974
Plasters	II	1972
Fireproofing Plasters	V	1968
** Fireproofing	III	1971
Ceiling Tile	II	1976
Textures	II	1976
Roofing	II	1976
Joint Compounds	II	1976
Pipe Covering	V	1938
Block Insulation	IV	1971
Cement Siding	II & IV	1975
Paste Spackling Putty	II	1975

** Thermal Insulation	III	1971
Adhesives	II	1977

* Includes production by subsidiary.

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

EXHIBIT 3

April 9, 1992

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

Adhesives - white to grayish-white, gray, black, tan, light green, light tan, olive and red

EXHIBIT 4

RESPONSE

U.S. Gypsum utilized warnings to applicators consistent with OSHA guidelines on its joint treatment products beginning in 1972, on texture products beginning in 1973, and on certain industrial plaster products in 1975.

The language of the warning was as follows:

> "Caution: Contains Asbestos Fibers. Avoid Creating Dust. Breathing Asbestos Dust May Cause Serious Bodily Harm"

In 1974, the above warning was modified by adding the following on joint compound products:

> "Observe the following precautions: Wet sanding or sponging finished joints is recommended rather than dry sanding to avoid creating dust. If dry sanding, mixing, or otherwise working in a dusty atmosphere containing this material, ventilate, use dust collector, or wear eye protection and a respirator approved by the Bureau of Mines or NIOSH, to remove nuisance dust."

Concerning SprayDon, a product sold and distributed by Sprayon Research Corporation, manufactured by U.S. Gypsum according to Sprayon's specifications, the following appeared on SprayDon bags in approximately June, 1966.

> "Contains Asbestos"

The following appeared on SprayDon in subsequent years.

> "Caution: This product contains asbestos." (1968)

> "Caution: This product contains asbestos which may be harmful to lungs if inhaled." (1969)

Concerning Super-tite Wet Patch, an adhesive manufactured by W.W. Henry Company and resold by U.S. Gypsum, the following appeared on the label for this product after 1972:

Contents
Asphalt Petroleum Spirits
Asbestos Fiber

U.S. Gypsum presently believes that during the period 1969 - 1973, asbestos was listed as a separate ingredient on packaging for its texture product, Imperial QT. Investigation continuing.

EXHIBIT 5

February 1, 1989

Schedule

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.

Corsiciana, 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