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8 KAISER GYPSUM COMPANY, INC.

9  
10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN FRANCISCO  
12

13 IN RE: SAN FRANCISCO COUNTY  
14 COMPLEX ASBESTOS LITIGATION

CASE NO. 828684

15 KAISER GYPSUM COMPANY, INC.'S  
16 UPDATED RESPONSES TO  
17 PLAINTIFFS' STANDARD  
18 INTERROGATORIES TO DEFENDANTS

19 PROPOUNDING PARTY : Plaintiffs  
20 RESPONDING PARTY : Defendant Kaiser Gypsum Company, Inc.  
21 SET : Standard  
22 DATE : December 30, 1996

23 COMES NOW defendant Kaiser Gypsum Company, Inc. (hereinafter  
24 "Kaiser Gypsum"), and provides the following updated responses to  
25 plaintiffs' standard interrogatories propounded pursuant to San  
26 Francisco County Complex Asbestos Litigation General Order No. 29:

27 KAISER GYPSUM'S PRELIMINARY STATEMENT AND OBJECTIONS

28 Kaiser Gypsum was constituted in 1952 and has been  
headquartered in California since that date. Kaiser Gypsum  
disposed of its last operating manufacturing plant in August 1978  
and subsequently has not engaged in manufacturing or product sales  
anywhere in the United States. Thus, all Kaiser Gypsum product

1 sales occurred between 1952 and 1978. Therefore, Kaiser Gypsum's  
2 responses to plaintiffs' standard interrogatories are based almost  
3 entirely on its ongoing review of documents presently available to  
4 the These updated interrogatory responses reflect Kaiser Gypsum's  
5 knowledge at this time and supersede any previous interrogatory  
6 answers. Kaiser Gypsum reserves the right to further supplement  
7 these responses in the event that more complete or accurate  
8 information becomes available.

9 Kaiser Gypsum notes that these responses are made without  
10 reference to the factual circumstances of any particular case,  
11 and, accordingly, Kaiser Gypsum reserves the right to state  
12 additional objections or provide supplemental responses that might  
13 be appropriate in the specific context of a given plaintiff's  
14 claim(s).

15 Kaiser Gypsum objects to requests for information that are  
16 unlimited as to geographical scope on the grounds that such  
17 requests are unduly burdensome and are not reasonably calculated  
18 to lead to the discovery of evidence admissible in cases that are  
19 subject to General Order No. 29. Accordingly, Kaiser Gypsum's  
20 present responses hereto are limited to products sold and  
21 operations conducted within the State of California.

22 Kaiser Gypsum objects to these interrogatories to the extent  
23 that they call for information protected by the attorney/client  
24 privilege or work product doctrine.

25 This Preliminary Statement and the objections contained  
26 herein are incorporated into each of the responses set forth  
27 below.

28 / / /

1                                    KAISER GYPSUM'S RESPONSES TO INTERROGATORIES

2                    RESPONSE TO INTERROGATORY NO. 1:

3                    (a) Joseph R. Hobby.

4                    (b) 2680 Bishop Drive, Suite 225, San Ramon, California  
5 94583.

6                    (c) Vice President.

7                    (d) 12/1/95-present: Vice President

8                    RESPONSE TO INTERROGATORY NO. 2:

9                    Kaiser Gypsum is a corporation.

10                   (a) Its full and correct corporate name is Kaiser Gypsum  
11 Company, Inc.

12                   (b) Kaiser Gypsum is incorporated under the laws of the  
13 State of Washington.

14                   (c) Kaiser Gypsum was organized in 1952 through a somewhat  
15 complicated process. Specifically, on June 19, 1952, Permanente  
16 Cement Company (now known as Kaiser Cement Corporation) formed a  
17 wholly owned subsidiary named Kaiser Gypsum Company, a California  
18 Corporation. On August 1, 1952 Kaiser Gypsum Company purchased  
19 from the Henry J. Kaiser Company two gypsum wallboard plants  
20 located at Long Beach and Redwood City, California.

21                   On December 1, 1952, Kaiser Gypsum Company was merged into  
22 Pacific Coast Cement Company, another subsidiary of Permanente  
23 Cement Company, with Pacific Coast Cement Company, a Washington  
24 Corporation, which at the time of the merger had no assets or  
25 operations and which was incorporated on November 28, 1927, being  
26 the survivor. The name of the combined company was then changed  
27 to Kaiser Gypsum Company, Inc.  
28

1 (d) Kaiser Gypsum's principal place of business is located  
2 at 3000 Busch Road, Pleasanton, California 94566.

3 (e) Kaiser Gypsum has held a certificate of authority to do  
4 business in California from 1952 to the present.

5 (f) Kaiser Gypsum's California "registered agent" is CT  
6 Corporation, 818 West Seventh Street, Los Angeles, CA 90017.

7 (g) Kaiser Gypsum is a wholly owned subsidiary of Kaiser  
8 Cement Corporation, whose principal place of business is located  
9 at 3000 Busch Road, Pleasanton, California 94566.

10 RESPONSE TO INTERROGATORY NO. 3:

11 Yes. See the history of Kaiser Gypsum's formation in 1952  
12 that is provided in its answer to Interrogatory 2(c) above.

13 RESPONSE TO INTERROGATORY NO. 4:

14 (a) No.

15 (b) Not applicable.

16 (c) Not applicable.

17 RESPONSE TO INTERROGATORY NO. 5:

18 No.

19 RESPONSE TO INTERROGATORY NO. 6:

20 (a) Kaiser Gypsum's corporate records are located at its  
21 headquarters, whose address is 3000 Busch Road, Pleasanton,  
22 California 94566; at 2680 Bishop Drive, San Ramon, CA 94583; and  
23 at a commercial storage site or sites located in the greater San  
24 Francisco area.

25 (b) Joseph R. Hobby, Vice President, 2680 Bishop Drive, San  
26 Ramon, California.

27 RESPONSE TO INTERROGATORY NO. 7:

28 (a) through (h): No.

1 RESPONSE TO INTERROGATORY NO. 8:

2 (a) See response to 8(e) and 8(g).

3 (b) No.

4 (c) See response to 8(e) and 8(g).

5 (d) See response to 8(e) and 8(g).

6 (e) Yes. 1953 to 1976.

7 (f) See response to 8(e) and 8(g).

8 (g) Yes. 1953 to 1976.

9 RESPONSE TO INTERROGATORY NO. 9:

10 Not applicable.

11 RESPONSE TO INTERROGATORY NO. 10:

12 I. Kaiser Gypsum's Business: Gypsum Plaster,  
13 Gypsum Lath, and Gypsum Wallboard - No Asbestos Used

14 Kaiser Gypsum was organized by Henry J. Kaiser (1882-1967),  
15 the famous industrialist and World War II hero, in 1952 and  
16 terminated its United States sales and manufacturing in 1978.  
17 Between 1952 and 1978, Kaiser Gypsum's principal business  
18 consisted of manufacturing and marketing gypsum plaster, gypsum  
19 lath and gypsum wallboard. The word "gypsum" is derived from the  
20 Greek word "gypso," meaning chalk. "Gypsum" is hydrous calcium  
21 sulfate. Gypsum plaster is sometimes called Plaster of Paris,  
22 because gypsum plaster was widely used in the capital of France  
23 during the 19th century. Gypsum occurs in nature in rock form,  
24 and is found in abundance in Baja California, Mexico.

25 A. Gypsum Plaster Products

26 During Kaiser Gypsum's first years in business, most houses  
27 and many other buildings had interior walls that were made with  
28 plaster. The plaster products sold by Kaiser Gypsum were

1 essentially finely-ground gypsum rock packaged in bags. Such  
2 gypsum plaster products were mixed with water and an aggregate  
3 (most commonly sand) at the construction site to form a paste.  
4 The paste was applied by hand and smoothed with a trowel to form a  
5 wall or ceiling surface. Sometimes several layers of plaster were  
6 used, with the underneath layers being brown in color and the  
7 surface layer being white. When dried, the plaster became quite  
8 hard. A plaster wall or ceiling typically was finished by  
9 painting the plaster surface or covering it with wallpaper.

10 Kaiser Gypsum's plaster products designed for the above  
11 construction uses included Hardwall Plaster, Fibered Hardwall  
12 Plaster, Dual Purpose Fibered Hardwall Plaster, Dual Purpose  
13 Unfibered Hardwall Plaster, Wood Fibered Hardwall Plaster, Slow  
14 Set Gauging Plaster, and Quick Set Gauging Plaster. They also  
15 included plaster products for casting (e.g., making ornaments or  
16 statues including Casting Plaster and Slow Set Casting Plaster).  
17 Kaiser Gypsum also manufactured Plaster Retarder and Structural  
18 Gypsum (Pre-Mixed Gypsum Concrete). Kaiser Gypsum plaster  
19 products also included Red-E-Mix plaster, a pre-mixed product  
20 which combined plaster and aggregate, that was introduced in 1956.  
21 Gun Plaster, introduced in 1957, was applied by mixing the sacked  
22 product on the job site in special portable mixing machines, and  
23 it was then pumped through a large diameter hose to the inside of  
24 a building where it was sprayed by plasterers onto walls, with  
25 comparative speed and economy. Kaiser Gypsum never used asbestos  
26 as a component in any of those products.

1           B.    Gypsum Lath Products

2           The surface to which gypsum plaster was applied was called  
3 "lath." Lath was sometimes made of wire, but lath also could be  
4 made of hard, paper covered sheets of gypsum plaster (called  
5 gypsum stucco), sometimes made with holes in them. The lath  
6 sheets would be affixed to the interior wall framing, and  
7 plaster would then be applied to the lath. The holes in the lath  
8 would help keep the plaster in place while it dried. Kaiser Gypsum  
9 made gypsum lath of this type. Kaiser Gypsum lath products  
10 included Plain Lath and Perforated Lath, Foil-Back Insulating  
11 Lath, Duralath, Gypsum Veneer Base, and Kaiserwall. Kaiser Gypsum  
12 never used asbestos as a component in any of those products.

13           C.    Gypsum Wallboard Products

14           In years following the Korean War, there were numerous  
15 innovations in housing construction, including many changes  
16 intended to lower housing construction costs. One such change was  
17 the substitution of gypsum wallboard, or drywall, for plaster.  
18 Gypsum wallboard, like gypsum lath, is basically a hard sheet of  
19 gypsum plaster that is affixed to the wall framing. Typically  
20 gypsum wallboard would be made in pieces that were 4 feet wide and  
21 8 feet long. They typically were 1/2 inch or 5/8 inch thick.  
22 During the manufacturing process, the wallboard's core of gypsum  
23 plaster was covered by a special paper that could be painted or  
24 covered with wallpaper.

25           Because more walls, partitions or ceilings could be made  
26 using gypsum wallboard in a given period of time than could be  
27 made by plastering over lath, constructing houses, apartments and  
28 other buildings with wallboard was less expensive. Over time, as

1 building codes were amended to permit use of gypsum wallboard,  
2 more construction of interior walls, partitions and ceilings was  
3 done using wallboard and less using plaster. Reflecting this  
4 trend, Kaiser Gypsum's business focused more on gypsum wallboard  
5 as time passed. By 1960 about half of the construction in  
6 California used wallboard and half still used plaster. Plaster use  
7 continued to decline, and by the early 1970's substantially all of  
8 the market demand was for gypsum wallboard. Kaiser Gypsum never  
9 used asbestos as a component in any of its gypsum wallboard  
10 products.

11 **D. Non-Asbestos Products Exceeded 90% Of Total Sales**

12 The bulk of Kaiser Gypsum's sales has always consisted of  
13 products that did not use asbestos as a component. To illustrate,  
14 the following chart shows sales totals in dollars for the years  
15 1969-1975, the last full year prior to the complete cessation of  
16 the use of asbestos as a component in Kaiser Gypsum products:

| Year | Non-Asbestos<br>Products | Total Sales  | Non-Asbestos Product<br>Percentage Of Total |
|------|--------------------------|--------------|---------------------------------------------|
| 1969 | \$41,360,000             | \$43,299,000 | 96%                                         |
| 1970 | \$37,258,000             | \$39,457,000 | 94%                                         |
| 1971 | \$48,403,000             | \$51,671,000 | 94%                                         |
| 1972 | \$58,468,000             | \$63,056,000 | 93%                                         |
| 1973 | \$65,803,000             | \$71,382,000 | 92%                                         |
| 1974 | \$64,996,000             | \$70,139,000 | 93%                                         |
| 1975 | \$41,318,000             | \$43,935,000 | 94%                                         |

24 As these figures illustrate, Kaiser Gypsum's sales of non-  
25 asbestos-containing products always were substantially more than  
26 90% of its business.  
27  
28

1       II.   Accessories For Use With Gypsum Wallboard

2           A.   Nails, Wall And Door Frames, Cornerbead,  
3               Paper Products - No Asbestos Used

4           With the expansion of its gypsum wallboard business, Kaiser  
5   Gypsum also began selling other products needed to construct  
6   interior walls, partitions or ceilings using gypsum wallboard.  
7   These included special nails and other devices used to attach  
8   wallboard to the supporting frame. They also included metal wall  
9   or partition frames especially made for installing wallboard,  
10   metal "cornerbead" used to make partition corners hard, and metal  
11   doorframes for use in walls made using gypsum wallboard. Partly  
12   to ensure that it could get access to adequate amounts of the  
13   special paper used to make wallboard (by covering its gypsum  
14   plaster core), Kaiser Gypsum acquired paper plants, where it also  
15   manufactured commercial paper products such as cardboard boxes.  
16   Kaiser Gypsum never used asbestos as a component in any of those  
17   products.

18           B.   Wallboard Joint Compounds -  
19               Asbestos Used As A Component

20           When the walls or ceilings of a room are made from gypsum  
21   wallboard, large pieces of wallboard are installed side by side,  
22   leaving small spaces where two pieces of wallboard meet. These  
23   spaces need to be filled so that they cannot be seen after the  
24   wall is painted or covered with wallpaper. The products used to  
25   perform that task are called joint compounds or joint finishing  
26   compounds. At the time of use, these joint compounds are thick  
27   putty or mud-like substances, which permits them to be pushed into  
28   the spaces and smoothed with a putty knife or spatula. Paper or

1 cloth reinforcing tape is pushed into the joint compound to help  
2 prevent cracking as the joint compound dries. The joint compound  
3 dries to form a hard rock-like substance.

4 Kaiser Gypsum manufactured and marketed such wallboard joint  
5 compounds, and prior to the mid-1970's, these joint compounds  
6 contained a small percentage of chrysotile asbestos as a  
7 component. The purpose of the chrysotile asbestos component was  
8 to prevent cracks from forming as the joint compound dried.

9 "Asbestos" is the Greek word for "incombustible," which refers to  
10 things that will not burn. Chrysotile is the most common type of  
11 asbestos used in products in the United States. Chrysotile is a  
12 fibrous rock material derived from the rock "serpentine" which is  
13 very common in California, where it is the "state rock."

14 These Kaiser Gypsum products were:

- 15 1. Joint Cement/Joint Compound
- 16 2. Finishing (Topping) Compound
- 17 3. 3-Purpose Wallboard Compound
- 18 4. One-Day Joint Compound
- 19 5. Pre-mix Joint Compound
- 20 6. Pre-mix Finishing Compound
- 21 7. Pre-mix Dual Purpose Joint Compound
- 22 8. Pre-mix Topping Compound
- 23 9. Laminating Compound

24 Kaiser Gypsum's separate responses to interrogatory subparts  
25 (a)-(f) for each of these products are as follows:

26 1. Joint Cement/Joint Compound

27 (a) The trade name of this product originally was Kaiser  
28 Joint Cement; about 1957 it was changed to Kaiser Joint Compound.

(b) Kaiser Gypsum marketed Kaiser Joint Cement in 1952, but  
did not manufacture the product itself. Kaiser Gypsum does not  
know whether the product marketed in 1952 contained asbestos as a

1 component. Kaiser Gypsum began manufacturing Kaiser Joint Cement  
2 in 1953, at which time chrysotile asbestos was used as a  
3 component.

4 (c) Kaiser Gypsum last manufactured Kaiser Joint Compound  
5 with chrysotile asbestos as a component in 1975.

6 (d) The Kaiser Gypsum California plants that made this  
7 product were located at Redwood City and Antioch. These plants  
8 were in operation at different times. The product was  
9 manufactured at Redwood City from 1953 through 1957 and at Antioch  
10 from 1957 to 1975. Because of the heavy weight of the product,  
11 low profit margin and high transportation costs, distribution  
12 tended to center around the location of the manufacturing plant.  
13 The product consisted primarily of minerals including casein or  
14 polyvinyl, clay, talc, limestone and mica. The product  
15 manufactured in Kaiser Gypsum's California plants included between  
16 8% by weight and 16% by weight chrysotile asbestos as a component  
17 depending on the formula in effect at a given date.

18 (e) This product was a white to off-white powder. It was  
19 packaged and sold in sacks of 10 to 25 lbs. and in boxes of 5 and  
20 18 lbs. Each container was labeled with the name of the  
21 manufacturer, Kaiser Gypsum Company, Inc., the name of the product  
22 and directions for its use.

23 (f) This product was a dry powder which, when mixed with  
24 water, formed a thick paste. Upon application it dried to a hard,  
25 durable surface. It was used to fill gypsum wallboard joints,  
26 embed joint reinforcing tape, finish joints and to cover and  
27 finish nail heads and metal cornerbead.

1           2.   Finishing (Topping) Compound

2           (a)   The trade name of this product was Kaiser Gypsum  
3           Finishing (topping) Compound.

4           (b)   Kaiser Gypsum began manufacturing finishing (topping)  
5           compound in 1955, and chrysotile asbestos was used as a component  
6           at that time.

7           (c)   Kaiser Gypsum last manufactured finishing (topping)  
8           compound with chrysotile asbestos as a component in 1975.

9           (d)   The Kaiser Gypsum California plants that made this  
10          product were located at Redwood City and Antioch. These plants  
11          were in operation at different times. The product was  
12          manufactured at Redwood City from 1955 to 1957 and at the Antioch  
13          plant from 1957 to 1975. Because of the heavy weight of the  
14          product, low profit margin and high transportation costs,  
15          distribution tended to center around the location of the  
16          manufacturing plant. This product consisted primarily of minerals  
17          including casein or polyvinyl, clay, talc, limestone and mica.  
18          The product included between 5.3% by weight and 16% by weight  
19          chrysotile asbestos as a component depending on the formula in  
20          effect at a given time.

21          (e)   This product was a white to off-white powder. It was  
22          packaged and sold in sacks of 25 lbs. Each container was labeled  
23          with the name of the manufacturer, Kaiser Gypsum Company, Inc.,  
24          the name of the product and instructions for its use.

25          (f)   This product was a dry powder which, when mixed with  
26          water, formed a thick paste. Upon application it dried to a hard,  
27          durable surface. It was used to top and finish gypsum wallboard  
28          joints.

1           3.    3-Purpose Wallboard Compound

2           (a) The trade name of this product was Kaiser Gypsum 3-  
3 Purpose Wallboard Compound.

4           (b) Kaiser Gypsum began manufacturing 3-Purpose Wallboard  
5 Compound in 1968, and chrysotile asbestos was used as a component  
6 at that time.

7           (c) Kaiser Gypsum last manufactured 3-Purpose Wallboard  
8 Compound with chrysotile asbestos as a component in 1976.

9           (d) The Kaiser Gypsum California plant that made this  
10 product was located at Antioch. Because of the heavy weight of  
11 the product, low profit margin and high transportation costs,  
12 distribution tended to center around the location of the  
13 manufacturing plant. This product consisted primarily of minerals  
14 including casein or polyvinyl, clay, talc, limestone and mica.  
15 The product included between 5.1% by weight and 14.2% by weight  
16 chrysotile asbestos as a component.

17          (e) The product was a white to off-white powder. It was  
18 packaged and sold in sacks of 25 lbs. Each sack was labeled with  
19 the name of the manufacturer, Kaiser Gypsum Company, Inc., the  
20 name of the product and directions for its use.

21          (f) This product was a dry powder which, when mixed with  
22 water, formed a thick paste. Upon application it dried to a hard,  
23 durable surface. It was used to tape, top and finish gypsum  
24 wallboard joints, nailheads and metal cornerbead.

25           4.    One-Day Joint Compound

26          (a) The trade name of this product was Kaiser Gypsum One-Day  
27 Joint Compound Powder.  
28

1 (b) Kaiser Gypsum began manufacturing One Day Joint Compound  
2 Powder in 1968, and chrysotile asbestos was used as a component at  
3 that time.

4 (c) Kaiser Gypsum last manufactured One Day Joint Compound  
5 Powder with chrysotile asbestos as a component in 1975.

6 (d) The Kaiser Gypsum California plants that made this  
7 product were located at Santa Ana and Antioch. Because of the  
8 heavy weight of the product, low profit margin and high  
9 transportation costs, distribution tended to center around the  
10 location of the manufacturing plant. The product consisted  
11 primarily of casein limestone and mica. The product included  
12 3.4% by weight chrysotile asbestos as a component.

13 (e) This product was a white to off-white powder. It was  
14 packaged and sold in sacks of 25 lbs. Each sack was labeled with  
15 the name of the manufacturer, Kaiser Gypsum Company, Inc., the  
16 name of the product and directions for its use.

17 (f) This product was a dry powder which, when mixed with  
18 water, formed a thick paste. Upon application it dried to a hard,  
19 durable surface. It was used to fill gypsum wallboard joints,  
20 embed joint reinforcing tape, finish joints and to cover and  
21 finish nailhead and metal cornerbead.

22 5. Pre-Mix Joint Compound

23 (a) The trade name of this product was Kaiser Gypsum Pre-Mix  
24 Joint Compound.

25 (b) Kaiser Gypsum began manufacturing Pre-Mix Joint Compound  
26 in 1959, and chrysotile asbestos was used as a component at that  
27 time.  
28

1 (c) Kaiser Gypsum last manufactured Pre-Mix Joint Compound  
2 with chrysotile asbestos as a component in 1962.

3 (d) The Kaiser Gypsum California plant that made this  
4 product was located at Long Beach. Because of the heavy weight of  
5 the product, low profit margin and high transportation cost,  
6 distribution tended to center around the location of the  
7 manufacturing plant. This product consisted primarily of minerals  
8 including casein or polyvinyl, clay, talc, limestone and mica.  
9 The product included chrysotile asbestos as a component. The  
10 percentage presently is unknown. Investigation is continuing.

11 (e) This product was a white to off-white colored paste. It  
12 was packaged and sold in cans of 4 or 5 gallons and in cartons of  
13 5 gallons. Each container was labeled with the name of the  
14 manufacturer, Kaiser Gypsum Company, Inc., the name of the product  
15 and directions for its use.

16 (f) This product was a thick paste like material which upon  
17 application dried to a hard, durable surface. It was used to fill  
18 gypsum wallboard joints, embed joint reinforcing tape, finish  
19 joints and to cover and finish nailheads and cornerbead.

20 **6. Pre-Mix Finishing Compound**

21 (a) The trade name of this product was Kaiser Gypsum Pre-Mix  
22 Finishing Compound.

23 (b) Kaiser Gypsum began manufacturing Pre-Mix Finishing  
24 Compound in 1959, and chrysotile asbestos was used as a component  
25 at that time.

26 (c) Kaiser Gypsum last manufactured Pre-Mix Finishing  
27 Compound with chrysotile asbestos as a component in 1962.  
28

1 (d) The Kaiser Gypsum California plant that made this  
2 product was located at Long Beach. Because of the heavy weight of  
3 the product, low profit margin and high transportation cost,  
4 distribution tended to center around the location of the  
5 manufacturing plant. This product consisted primarily of minerals  
6 including casein or polyvinyl, clay, talc, limestone and mica.  
7 The product included chrysotile asbestos as a component. The  
8 percentage presently is unknown. Investigation is continuing.

9 (e) This product was a white to off-white colored paste. It  
10 was packaged and sold in cans of 4 or 5 gallons and in cartons of  
11 5 gallons. Each container was labeled with the name of the  
12 manufacturer, Kaiser Gypsum Company, Inc., the name of the product  
13 and directions for its use.

14 (f) This product was a thick paste like material which upon  
15 application dried to a hard, durable surface. It was used to  
16 finish gypsum wallboard joints and to cover and finish nailheads  
17 and cornerbead.

18 7. Pre-Mix Dual Purpose Joint Compound

19 (a) The trade name of this product was Kaiser Gypsum Pre-Mix  
20 Dual Purpose Joint Compound.

21 (b) Kaiser Gypsum began manufacturing Pre-Mix Dual Purpose  
22 Joint Compound in 1960, and chrysotile asbestos was used as a  
23 component at that time.

24 (c) Kaiser Gypsum last manufactured Pre-Mix Dual Purpose  
25 Joint Compound with chrysotile asbestos as a component in 1975.

26 (d) The Kaiser Gypsum California plants that made this  
27 product were located at Long Beach, Antioch and Santa Ana.  
28 Because of the heavy weight of the product, low profit margin and

1 high transportation costs, distribution tended to center around  
2 the location of the manufacturing plant. This product consisted  
3 primarily of minerals including polyvinyl, clay, talc, limestone  
4 and mica. The product included between 1.5% by weight and 6% by  
5 weight chrysotile asbestos as a component depending on the formula  
6 in effect at a given date.

7 (e) This product was a white to off-white or light buff  
8 colored paste. It was packaged and sold in 5 gallon metal cans or  
9 plastic pails, and 4 or 5 gallon cartons. Beginning in 1966 small  
10 amounts were sold in 5 quart plastic buckets as an accommodation  
11 product for lumber dealers under the name 3-purpose premix  
12 compound. Each container was labeled with the name of the  
13 manufacturer, Kaiser Gypsum Company, Inc., the name of the product  
14 and directions for its use.

15 (f) This product was a thick paste like material which upon  
16 application dried to a hard, durable surface. It was used to  
17 finish gypsum wallboard joints, embed joint reinforcing tape,  
18 finish joints and to cover and finish nailheads and metal  
19 cornerbead.

#### 20 8. Pre-Mix Topping Compound

21 (a) The trade name of this product was Kaiser Gypsum Pre-Mix  
22 Topping Compound.

23 (b) Kaiser Gypsum began manufacturing Pre-Mix Topping  
24 Compound in 1968, and chrysotile asbestos was used as a component  
25 at that time.

26 (c) Kaiser Gypsum last manufactured Pre-Mix Topping Compound  
27 with chrysotile asbestos as a component in 1976.  
28

1 (d) The Kaiser Gypsum California plants that made this  
2 product were located at Santa Ana and Antioch. Because of the  
3 heavy weight of the product, low profit margin and high  
4 transportation costs, distribution tended to center around the  
5 location of the manufacturing plant. This product consisted  
6 primarily of minerals including casein or polyvinyl, clay, talc,  
7 limestone and mica. The product included between 0.9% by weight  
8 and 2% by weight chrysotile asbestos as a component depending on  
9 the formula in effect at a given date.

10 (e) This product was a white to off-white or light buff  
11 colored paste. It was packaged and sold in metal and plastic  
12 buckets of 4 or 5 gallons and in cartons of 4 gallons. Each  
13 container was labeled with the name of the manufacturer, Kaiser  
14 Gypsum Company, Inc., the name of the product and directions for  
15 its use.

16 (f) This product was a thick paste like material which upon  
17 application dried to a hard, durable surface. It was used to top  
18 and finish gypsum wallboard joints.

19 **9. Laminating Compound**

20 (a) The trade name of this product was Kaiser Gypsum  
21 Laminating Compound.

22 (b) Kaiser Gypsum began manufacturing Laminating Compound in  
23 1961, at which time chrysotile asbestos was used as a component.

24 (c) Kaiser Gypsum last manufactured Kaiser Gypsum Laminating  
25 Compound with chrysotile asbestos as a component in 1972, at which  
26 time the product was discontinued.

27 (d) The Kaiser Gypsum California plants that made this  
28 product were located at Antioch and Santa Ana. These plants were

1 in operation at different times. The product was manufactured at  
2 Antioch from 1961 through 1970 and at Santa Ana in 1971 and 1972.  
3 Because of the heavy weight of the product, low profit margin and  
4 high transportation costs, distribution tended to center around  
5 the location of the manufacturing plant. The product consisted  
6 primarily of soya, flour and limestone. The product included  
7 between 6.5% by weight and 10% by weight chrysotile asbestos as a  
8 component depending upon the formula in effect at a given date.

9 (e) This product was a white to off-white powder. It was  
10 packaged and sold in sacks of 25 lbs. Each container was labeled  
11 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,  
12 the name of the product and directions for its use.

13 (f) This product was a dry powder, which when mixed with  
14 water formed a thick paste. It was used as an adhesive to  
15 laminate one piece of gypsum wallboard to another, which was  
16 occasionally done to create gypsum drywall partitions having  
17 thicker wallboard than could be created by a single sheet. For  
18 example, gypsum wallboard typically came in sheets 1/2 inch and  
19 5/8 inch thick. If one wanted a gypsum wallboard that was 1 inch  
20 thick, this would be created by laminating together two pieces of  
21 gypsum wallboard that were each 1/2 inch thick. Laminating  
22 compound was used for this purpose. Additionally, it was used to  
23 laminate gypsum wallboard to sound deadening board, which would  
24 increase the wall's capacity to prevent transmission of sound from  
25 one room to another.

26 \* \* \*

1 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)  
2 applicable to all of the eight wallboard joint compound products  
3 discussed above are as follows:

4 (g) Kaiser Gypsum is unsure as to the intended meaning of  
5 "The U.S. Government's 'Qualified Products List'," but has no  
6 knowledge that any of its wallboard joint compound products ever  
7 appeared on such a list.

8 (h) Kaiser Gypsum is aware of the following suppliers of  
9 chrysotile asbestos:

10 John K. Bice  
11 Harrison & Crosfield  
12 Carmonia Chemical Co.  
13 Western Chemical Co.  
14 Philip Carey Corp. (Carey Canadian Asbestos)  
15 Johns-Manville  
16 Union Carbide Corp.  
17 E. S. Browning  
18 Loomis Chemical Co.  
19 Benson Chemical  
20 Paul W. Wood (Johns-Manville)

21 Current addresses, if any, are not known to Kaiser Gypsum.  
22 Most of the specific time periods during which these firms  
23 supplied asbestos are unknown.

24 (i) (i through iii) Kaiser Gypsum is not aware of ever selling  
25 such products to shipyards, power companies or refineries. Kaiser  
26 Gypsum sold such products to non-governmental customers in Northern  
27 California from approximately 1952 to 1976. These customers consist  
28 largely of building contractors or building materials dealers.

29 Kaiser Gypsum has some retained sales orders and sales  
30 invoices for some years which identify the purchasers of Kaiser  
31 Gypsum products, the dates of sale, the amount of each product  
32 sold and, in some cases, the sites to which the products were to

1 be delivered. These documents do not distinguish between sales of  
2 asbestos-containing products and other products.

3 (j) Sales orders and sales invoices. See also Response to  
4 Interrogatory 6(b).

5 **C. Decorative Texture Finishes For Interior Walls**  
6 **or Ceilings - Asbestos Used As A Component**

7 Drywall partitions or walls made from gypsum wallboard are  
8 sometimes decorated with wall covering or wallpaper that is fixed  
9 to the wall by an adhesive or glue. On other occasions such walls  
10 are finished by painting them. There are many varieties of paint,  
11 including some that are intended to create a textured surface  
12 (rather than a smooth surface). Kaiser Gypsum manufactured and  
13 marketed several texture paint products that during certain years  
14 used chrysotile asbestos as one of numerous components. Drywall  
15 ceilings are sometimes finished with decorative products, as are  
16 the cement slab ceilings found in some high-rise buildings.  
17 Kaiser Gypsum also manufactured and marketed decorative texture  
18 products for use on such interior ceilings that, during certain  
19 years, used chrysotile asbestos as one of numerous components.  
20 The Kaiser Gypsum decorative wall and ceiling texture products  
21 were:

- 22 1. Cover-Tex texture paint
- 23 2. Spray-Tex or Spray Cover-Tex texture paint
- 24 3. Kaiser-Tex texture paint
- 25 4. Covertex (TSS) wall texture
- 26 5. K-Spray ceiling texture

27 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)  
28 for each of these products are as follows:

1           1.    Cover-Tex Texture Paint

2           (a)   The trade name of this product was Cover-Tex texture  
3 paint.

4           (b)   Kaiser Gypsum marketed Cover-Tex texture paint in 1952,  
5 but it did not manufacture the product itself. Kaiser Gypsum does  
6 not know whether the product marketed in 1952 contained asbestos.

7           Kaiser Gypsum began manufacturing this product in 1953, at which  
8 time chrysotile asbestos was used as a component.

9           (c)   Kaiser Gypsum last manufactured Cover-Tex texture paint  
10 with chrysotile asbestos as a component in 1967, when the product  
11 was discontinued.

12           (d)   The Kaiser Gypsum California plants that made this  
13 product were located in Redwood City and Antioch. These plants  
14 were in operation at different times. The product was  
15 manufactured at Redwood City from 1953 through 1957 and at the  
16 Antioch plant from 1957 through 1967. Because of the heavy weight  
17 of the product, low profit margin and high transportation costs,  
18 distribution tended to center around the location of the  
19 manufacturing plant. The product consisted primarily of casein,  
20 limestone and mica. The product included between 4.4% by weight  
21 and 8.6% by weight chrysotile asbestos as a component depending  
22 upon the formula in effect at a given date.

23           (e)   This product was a white to off-white powder. It was  
24 packaged and sold in sacks of 25 lbs. and sacks of 50 lbs. Each  
25 container was labeled with the name of the manufacturer, Kaiser  
26 Gypsum Company, Inc., the name of the product and directions for  
27 its use.

1 (f) This product was a dry powder which, when mixed with  
2 water formed a texture paint. It was used to produce texture  
3 effects over gypsum wallboard surfaces.

4 **2. Spray-Tex Or Spray Cover-Tex Texture Paint**

5 (a) The trade name of this product was Spray-Tex. Later it  
6 was changed to Spray Cover-Tex texture paint.

7 (b) Kaiser Gypsum began manufacturing this product in 1956,  
8 at which time chrysotile asbestos was used as a component.

9 (c) Kaiser Gypsum last manufactured Spray Cover-Tex texture  
10 paint with chrysotile asbestos as a component in 1967, when the  
11 product was discontinued.

12 (d) The Kaiser Gypsum California plants that made this  
13 product were located in Redwood City and Antioch. These plants  
14 were in operation at different times. The product was  
15 manufactured at Redwood City from 1956 through 1957 and at the  
16 Antioch plant from 1957 through 1967. Because of the heavy weight  
17 of the product, low profit margin and high transportation costs,  
18 distribution tended to center around the location of the  
19 manufacturing plant. The product consisted primarily of casein,  
20 limestone and mica. The product included between 6.6% by weight  
21 and 36.6% by weight chrysotile asbestos as a component depending  
22 upon the formula in effect at a given date.

23 (e) This product was a white to off-white powder. However,  
24 some colored versions of the product were offered. It was  
25 packaged and sold in sacks of 25 lbs. and sacks of 50 lbs. Each  
26 container was labeled with the name of the manufacturer, Kaiser  
27 Gypsum Company, Inc. The name of the manufacturer, Kaiser Gypsum  
28 Company, Inc., the name of the product and directions for its use.

1 (f) This product was a dry powder which, when mixed with  
2 water formed a texture paint that was used to produce texture  
3 effects over gypsum wallboard surfaces.

4 3. Kaiser-Tex Texture Paint

5 (a) The trade name of this product was Kaiser-Tex texture  
6 paint.

7 (b) Kaiser Gypsum marketed Kaiser-Tex texture paint in 1952,  
8 but it did not manufacture the product itself. Kaiser Gypsum does  
9 not know whether the product manufactured in 1952 contained  
10 asbestos. Kaiser Gypsum began manufacturing this product in 1953,  
11 at which time chrysotile asbestos was used as a component.

12 (c) Kaiser Gypsum last manufactured Kaiser-Tex texture  
13 paint with chrysotile asbestos as a component in 1967, when the  
14 product was discontinued.

15 (d) The Kaiser Gypsum California plants that made this  
16 product were located in Redwood City and Antioch. These plants  
17 were in operation at different times. The product was  
18 manufactured at Redwood City from 1953 through 1957 and at the  
19 Antioch plant from 1957 through 1967. Because of the heavy weight  
20 of the product, low profit margin and high transportation costs,  
21 distribution tended to center around the location of the  
22 manufacturing plant. The product consisted primarily of casein,  
23 limestone and mica. The product included between 4.0% by weight  
24 and 8.0% by weight chrysotile asbestos as a component depending  
25 upon the formula in effect at a given date.

26 (e) This product was a white to off-white powder; however,  
27 some colored paints were sold. It was packaged and sold in sacks  
28 of 10 lbs. and sacks of 25 lbs. Each container was labeled with

1 the name of the manufacturer, Kaiser Gypsum Company, Inc., the  
2 name of the product and directions for its use.

3 (f) This product was a dry powder which, when mixed with  
4 water formed a texture paint. It was used to produce texture  
5 effects over gypsum wallboard surfaces.

6 4. Cover-Tex (Tss) Wall Texture

7 (a) The trade name of this product was Kaiser Gypsum Cover-  
8 Tex (TSS) wall texture paint.

9 (b) Kaiser Gypsum began manufacturing Cover-Tex Wall Texture  
10 in 1968, at which time chrysotile asbestos was used as a  
11 component.

12 (c) Kaiser Gypsum last manufactured Cover-Tex Wall Texture  
13 with chrysotile asbestos as a component in 1975.

14 (d) The Kaiser Gypsum California plants that manufactured  
15 this product were Santa Ana and Antioch. These plants were in  
16 operation at different times. The product was manufactured at  
17 Santa Ana from 1968 through 1975 and at the Antioch plant from  
18 1968 through 1975. Because of the heavy weight of the product,  
19 low profit margin and high transportation costs, distribution  
20 tended to center around the location of the manufacturing plant.  
21 The product consisted primarily of casein, limestone and mica.  
22 The product included between 4.2% by weight and 8.7% by weight  
23 chrysotile asbestos as a component depending upon the formula in  
24 effect at a given date.

25 (e) The product was a white to off-white powder. It was  
26 packaged and sold in 50 lb. sacks. Each container was labeled  
27 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,  
28 the name of the product and directions for its use.

1 (f) This was a dry powder which when mixed with water formed  
2 a paint-like product designed for hand or spray application. When  
3 dry, it produced a hard, durable surface. It was used to produce  
4 texture effects over gypsum wallboard surfaces.

5 **5. K-Spray Ceiling Texture**

6 (a) The trade name of this product was Kaiser Gypsum K-Spray  
7 Ceiling Texture.

8 (b) Kaiser Gypsum began manufacturing K-Spray Ceiling  
9 Texture with chrysotile asbestos as a component in 1961.

10 (c) Kaiser Gypsum last manufactured K-Spray Ceiling Texture  
11 with chrysotile asbestos as a component in 1975.

12 (d) The Kaiser Gypsum California plants that manufactured  
13 this product were Santa Ana and Antioch. These plants were in  
14 operation at different times. The product was manufactured at  
15 Santa Ana from 1973 through 1975 and at the Antioch plant from  
16 1961 through 1971. Because of the heavy weight of the product,  
17 low profit margin and high transportation costs, distribution  
18 tended to center around the location of the manufacturing plant.  
19 The product consisted primarily of casein, limestone and mica.  
20 The product included between 1.3% by weight and 9.9% by weight  
21 chrysotile asbestos as a component depending upon the formula in  
22 effect at a given date.

23 (e) The product was a white powder with polystyrene  
24 aggregate. It was packaged and sold in 32 lb. sacks. Each  
25 container was labeled with the name of the manufacturer, Kaiser  
26 Gypsum Company, Inc., the name of the product and directions for  
27 its use.  
28

1 (f) This was a dry powder which when mixed with water formed  
2 a paint-like product designed for spray application. When dry, it  
3 produced a hard, durable surface. It was used to produce texture  
4 effects over gypsum wallboard or interior concrete ceilings.

5 \* \* \*

6 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)  
7 applicable to all of the five decorative texture products  
8 discussed above are as follows:

9 (g) Kaiser Gypsum is unsure as to the intended meaning of  
10 "The U.S. Government's 'Qualified Products List'," but has no  
11 knowledge that any of its decorative texture products ever  
12 appeared on such a list.

13 (h) Kaiser Gypsum is aware of the following suppliers of  
14 chrysotile asbestos:

15 John K. Bice  
16 Harrison & Crosfield  
17 Carmonia Chemical Co.  
18 Western Chemical Co.  
19 Philip Carey Corp. (Carey Canadian Asbestos)  
20 Johns-Manville  
21 Union Carbide Corp.  
22 E. S. Browning  
23 Loomis Chemical Co.  
24 Benson Chemical  
25 Paul W. Wood (Johns-Manville)

26 Current addresses, if any, are not known to Kaiser Gypsum.  
27 Most of the specific time periods during which these firms  
28 supplied asbestos are unknown.

29 (i) (i through iii) Kaiser Gypsum is not aware of ever  
30 selling such products to shipyards, power companies or refineries.  
31 Kaiser Gypsum sold such products to non-governmental customers in  
32 Northern California from approximately 1952 to 1975. These

1 customers consisted largely of building contractors or building  
2 materials dealers.

3 Kaiser Gypsum has some retained sales orders and sales  
4 invoices for some years which identify the purchasers of Kaiser  
5 Gypsum products, the dates of sale, the amount of each product  
6 sold, and, in some cases, the sites to which the products were to  
7 be delivered. These documents do not distinguish between sales of  
8 asbestos-containing products and other products.

9 (j) Sales orders and sales invoices. See also Response to  
10 Interrogatory 6(b).

11 **D. Electric Radiant Heat System Finishing**  
12 **Products - Asbestos Used As A Component**

13 In areas where electricity was expected to be particularly  
14 inexpensive, some houses and apartments were constructed with  
15 electric radiant heating systems. In some such radiant heating  
16 systems, grooves were cut in gypsum wallboard ceilings and  
17 electrical heating cables secured in the grooves. The groove-  
18 cracks were then filled and the ceiling covered with a decorative  
19 finish. In other systems, electric heating wires were stapled to  
20 the surface of wallboard. Then the ceiling was covered with a  
21 thick decorative finish that would conceal the heating wires.  
22 Kaiser Gypsum made several products for finishing such systems,  
23 and these products used chrysotile asbestos as one of numerous  
24 components. These Kaiser Gypsum products were:

- 25 1. Filler Compound
- 26 2. Radiant Heat Compound
- 27 3. Radiant Heat Scrimless Surfacing Compound

28 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)  
for each of these products are as follows:

1           1.   Filler Compound

2           (a)   The trade name of this product was Kaiser Gypsum Filler  
3   Compound.

4           (b)   Kaiser Gypsum began manufacturing Filler Compound in  
5   1961, at which time chrysotile asbestos was used as a component.

6           (c)   Kaiser Gypsum last manufactured Filler Compound with  
7   chrysotile asbestos as a component in 1972, when the product was  
8   discontinued.

9           (d)   The Kaiser Gypsum California plant that made this  
10   product was located at Antioch. It manufactured Filler Compound  
11   from 1961 to 1970. Because of the heavy weight of the product,  
12   the low profit margin and high transportation costs, distribution  
13   tended to center around the location of the manufacturing plant.  
14   The product consisted primarily of minerals including limestone  
15   and mica. The product used chrysotile asbestos as a component in  
16   its formula but the amount of asbestos called for in the formula  
17   used to manufacture the product at the Antioch plant is uncertain.  
18   Investigation is continuing.

19           (e)   This product was a white to off-white powder. It was  
20   packaged and sold in sacks of 50 lbs. Each container was labeled  
21   with contained the name of the manufacturer, Kaiser Gypsum  
22   Company, Inc., the name of the product and directions for its use.

23           (f)   This product was a dry powder, which when mixed with  
24   water formed a thick paste. Upon application it dried to a hard,  
25   durable surface. It was used to cover radiant heating system  
26   ceiling surfaces.

27

28

1                   2.   Radiant Heat Compound

2           (a)   The trade name of this product was Kaiser Gypsum Radiant  
3 Heat Compound.

4           (b)   Kaiser Gypsum began manufacturing this product in 1968,  
5 at which time chrysotile asbestos was used as a component.

6           (c)   Kaiser Gypsum last manufactured Radiant Heat Compound  
7 with chrysotile asbestos as a component in 1974, when the product  
8 was discontinued.

9           (d)   The Kaiser Gypsum California plant that made this  
10 product was located in Santa Ana, where it was manufactured from  
11 1968 through 1974. Because of the heavy weight of the product,  
12 the low profit margin and high transportation costs, distribution  
13 tended to center around the location of the manufacturing plant.  
14 The product consisted primarily of sand and white portland cement.  
15 The product included between 3.3% by weight and 3.6 by weight  
16 chrysotile asbestos as a component.

17          (e)   This product was a white to off-white powder. It was  
18 packaged and sold in sacks of 60 lbs. Each container was labeled  
19 with the name of the manufacturer, Kaiser Gypsum Company, Inc.,  
20 the name of the product and directions for its use.

21          (f)   This product was a dry powder, which when mixed with  
22 water formed a thick paste that was used to cover radiant heating  
23 cables stapled to ceiling surfaces.

24                   3.   Radiant Heat Scrimless Surfacing Compound

25          (a)   The trade name of this product was Kaiser Gypsum Radiant  
26 Heat Scrimless Surfacing Compound.

1 (b) Kaiser Gypsum began manufacturing this product in  
2 California in 1972, at which time chrysotile asbestos was used as  
3 a component.

4 (c) Kaiser Gypsum last manufactured Radiant Heat Scrimless  
5 Surfacing Compound with chrysotile asbestos as a component in  
6 1974, when the product was discontinued.

7 (d) The Kaiser Gypsum California plant that made this  
8 product was located in Santa Ana, where it was manufactured from  
9 1972. Because of the heavy weight of the product, the low profit  
10 margin and high transportation costs, distribution tended to  
11 center around the location of the manufacturing plant. The  
12 product consisted primarily of sand, silica flour and mica. The  
13 product included 5% by weight chrysotile asbestos as a component.

14 (e) This product was a greenish powder. It was packaged and  
15 sold in sacks of 25 lbs. and in sacks of 50 lbs. Each container  
16 was labeled with the name of the manufacturer, Kaiser Gypsum  
17 Company, Inc., the name of the product and directions for its use.

18 (f) This product was a dry powder, which when mixed with  
19 water formed a thick paste that was used to cover radiant heating  
20 cables embedded in ceiling surfaces.

21 \* \* \*

22 Kaiser Gypsum's responses to interrogatory subparts (g)-(j)  
23 applicable to all of the three radiant heating system surfacing  
24 products discussed above are as follows:

25 (g) Kaiser Gypsum is unsure as to the intended meaning of  
26 "The U.S. Government's 'Qualified Products List'," but has no  
27 knowledge that any of its radiant heating system surfacing  
28 products ever appeared on such a list.

1 (h) Kaiser Gypsum is aware of the following suppliers of  
2 asbestos:

3 John K. Bice  
4 Harrison & Crosfield  
5 Carmonia Chemical Co.  
6 Western Chemical Co.  
7 Philip Carey Corp. (Carey Canadian Asbestos)  
8 Johns-Manville  
9 Union Carbide Corp.  
10 E. S. Browning  
11 Loomis Chemical Co.  
12 Benson Chemical  
13 Paul W. Wood (Johns-Manville)

14 Current addresses, if any, are not known to Kaiser Gypsum.  
15 Most of the specific time periods during which these firms  
16 supplied asbestos are unknown.

17 (i) (i through iii) Kaiser Gypsum is not aware of ever  
18 selling such products to shipyards, power companies or refineries.  
19 Kaiser Gypsum sold such products to non-governmental customers in  
20 Northern California from approximately 1952 to 1976. These  
21 customers consisted largely of building contractors or building  
22 materials dealers.

23 Kaiser Gypsum has some retained sales orders and sales  
24 invoices for some years which identify the purchasers of Kaiser  
25 Gypsum products, the dates of sale, the amount of each product  
26 sold, and, in some cases, the sites to which the products were to  
27 be delivered. These documents do not distinguish between sales of  
28 asbestos-containing products and other products.

(j) Sales orders and sales invoices. See also Response  
to  
Interrogatory 6(b).

E. Gypsum Wallboard Accessories For  
Exterior Use - Asbestos Used As A Component

1 Kaiser Gypsum experimented with gypsum wallboard products for  
2 use on the exterior surfaces of buildings, but those products  
3 proved unsuccessful. Kaiser Gypsum never discovered a way for  
4 them to be manufactured that would allow them to effectively  
5 withstand the wide variety of weather and temperature conditions  
6 that exterior products confront. Those exterior gypsum products  
7 were marketed in several test areas and, as in the case of  
8 interior gypsum drywall products, required the use of materials  
9 to fill the spaces between pieces of gypsum wallboard and to  
10 provide a decorative finish. Kaiser Gypsum offered products for  
11 those purposes whose components included small percentages of  
12 chrysotile asbestos. These products were:

- 13 1. X-Terior Premix Prefill Compound
- 14 2. X-Terior Premix Wall Texture Compound

15 Kaiser Gypsum's responses to interrogatory subparts (a)-(f)  
16 for each of these products are as follows:

17 1. X-Terior Premix Prefill Compound

18 (a) The trade name of this product was Kaiser Gypsum X-  
19 Terior Premix Prefill Compound.

20 (b) & (c) Kaiser Gypsum began and ceased marketing this  
21 product during 1975. Chrysotile asbestos was used as a component  
22 for the brief period during which this product was manufactured.

23 (d) The Kaiser Gypsum California plant that made this  
24 product was located at Antioch. The product was marketed in a  
25 limited market area where exterior gypsum wallboard was being sold  
26 on a test basis. Kaiser Gypsum X-Terior Premix Prefill Compound  
27 was made primarily of raw gypsum, PVA emulsion and mica. The  
28

1 product included 1.5% by weight chrysotile asbestos as a  
2 component.

3 (e) This product was a white to off-white paste. It was  
4 packaged and sold in metal cans and plastic buckets of 60 lbs.,  
5 and in cartons of 48 and 60 lbs. Each container was labeled with  
6 the name of the manufacturer, Kaiser Gypsum Company, Inc., the  
7 name of the product and directions for its use.

8 (f) This product was a paste that was used to pre-fill  
9 joints in gypsum wallboard installed on building exteriors.

10 2. X-Terior Premix Wall Texture Compound

11 (a) The trade name of this product was Kaiser Gypsum X-  
12 Terior Premix Wall Texture Compound.

13 (b) & (c) Kaiser Gypsum began and ceased marketing this  
14 product during 1975. Chrysotile asbestos was used as a component  
15 for the brief period during which this product was manufactured.

16 (d) The Kaiser Gypsum California plant that made this  
17 product was located at Antioch. The product consisted primarily  
18 of limestone, acrylic emulsion and mica. The product included  
19 1.5% by weight chrysotile asbestos as a component.

20 (e) The product was a white to off-white paste. It was  
21 packaged and sold in 58-lb. metal cans, plastic buckets and  
22 cartons. Each container was labeled with the name of the  
23 manufacturer, Kaiser Gypsum Company, Inc., the name of the product  
24 and directions for its use.

25 (f) This product was a white to off-white paste that was  
26 used to provide surface texture to gypsum wallboard installed on  
27 building exteriors.

1 sold, and, in some cases, the sites to which the products were to  
2 be delivered. These documents do not distinguish between sales of  
3 asbestos-containing products and other products.

4 (j) Sales orders and sales invoices. See also Response to  
5 Interrogatory 6(b).

6 **III. Products Made At Kaiser Gypsum's Oregon Plant**

7 From 1956 to 1978 Kaiser Gypsum owned and operated a plant  
8 located at St. Helens, Oregon whose basic capability was to make  
9 building construction products by compressing wood fibers  
10 extracted from wood chips to make various types of sheets and  
11 boards.

12 **A. Firtex Products - No Asbestos Used**

13 The overwhelming majority of the products Kaiser Gypsum made  
14 at its Oregon plant were sold with the trademark "Firtex." No  
15 product sold under this trade name ever used asbestos as a  
16 component. Firtex products included various types of materials  
17 intended to provide insulation against outside temperatures or to  
18 dampen noise. Such products included sheathing that was nailed to  
19 walls before outer layers of bricks or siding were installed. They  
20 also included sheet products for insulating roofs. They also  
21 included sound deadening board that was used in partitions to  
22 reduce the noise that could be heard from adjacent rooms.

23 Firtex products also included materials intended for use on  
24 ceilings. One type was tiles that could be glued or tacked to  
25 ceilings to reduce noise. Another group of such products was used  
26 in suspended ceilings. Suspended ceilings are made by hanging a  
27 wood or metal frame from the structural members of a ceiling and  
28 then laying square or rectangular decorative and insulating pieces

1 into the frame. Those pieces were termed "lay-in boards." Such  
2 suspended ceilings used a significant amount of the room's  
3 vertical space and because that vertical space cost money to  
4 build, suspended ceilings were most commonly found in commercial  
5 buildings or office buildings, which typically had higher ceilings  
6 than houses during the 1956-1978 period when Kaiser Gypsum made  
7 the products. The Firtex line of products was quite successful,  
8 and Kaiser Gypsum sold them in great volume. ::

9       B.    Mineral Fiber Products

10       1.    Kaiser Gypsum Ordinary And 1-Hour Fire Rated  
11       Mineral Fiberboard Products - No Asbestos Used

12       As high-rise buildings became more common in California  
13 during the 1960's, building code authorities became increasingly  
14 concerned about the risks of fires in those buildings and  
15 encouraged the development and use of products that were less  
16 likely to burn. Since its Firtex wood-chip products would burn,  
17 Kaiser Gypsum sought to develop other ceiling tile and lay-in  
18 board products that would be more resistant to fire. Kaiser  
19 Gypsum found that the manufacturing machinery at its St. Helens,  
20 Oregon plant could be used to make ceiling tiles and lay-in boards  
21 for suspended ceilings with various types of mineral wool as the  
22 principal component (instead of wood chips). Mineral wool is the  
23 name given to products made by heating various types of rock to  
24 extremely high temperature (where they melt), spinning them into  
25 threads, and then letting them cool. Mineral wool looks something  
26 like steel wool that is used for rubbing rust off of metal or used  
27 in certain kitchen scouring pads. Mineral wool does resist fire  
28 and Kaiser Gypsum was successful in developing ceiling tiles and

1           **Mineral Fibreboard - U.L. Fire Rated**  
2           **(Underwriters' Laboratories, Inc. Design)**

3           (a) The trade name of this product, a mineral fiber product,  
4 was Kaiser Mineral Fibreboard - U.L. Fire Rated (Underwriters'  
5 Laboratories, Inc. Design). The same product was cut into ceiling  
6 tiles and lay-in boards for use in suspended ceilings. It was  
7 used for acoustical ceiling tile and suspended lay-in board in  
8 circumstances where a 2-hour fire resistance classification was  
9 specified. Both the ceiling tiles and the lay-in boards were sold  
10 under the trade name "Kaiser Mineral Fibreboard-UL Fire Rated  
11 (Underwriters' Laboratories, Inc. design)."

12           (b) Kaiser Gypsum began manufacturing Mineral Fibreboard-  
13 U.L. Fire Rated with chrysotile asbestos as a component in 1963.

14           (c) Kaiser Gypsum last manufactured Mineral Fibreboard-U.L.  
15 Fire Rated with chrysotile asbestos as a component in 1974, when  
16 the 2-hour fire-rated product was discontinued.

17           (d) The plant that made this product was located at St.  
18 Helens, Oregon. This product included 1.6% by weight chrysotile  
19 asbestos as a component.

20           (e) This product consisted of ceiling tiles and lay-in  
21 boards with face side white or colored and with perforated or  
22 fissured design for acoustical treatment. The tiles were 1/2" or  
23 5/8" by 12" by 12" and the lay-in boards came in two sizes: 1/2"  
24 or 5/8" by 24" by 24" and 1/2" or 5/8" by 24" by 48." They were  
25 packaged and sold in boxes of various quantities. The boxes  
26 contained the name of the manufacturer, Kaiser Gypsum Company,  
27 Inc., the name of the product and other printed material. Kaiser  
28 Gypsum's 2-hour fire-rated ceiling tiles and suspended ceiling

1 lay-in board products (in which chrysotile asbestos was used as a  
2 component) were required to be specially marked because they  
3 looked similar to other Kaiser Gypsum mineral fiberboard ceiling  
4 tiles and lay-in boards (that did not contain asbestos as a  
5 component) and building inspectors wanted to be able to check to  
6 make sure that products with a 2-hour fire resistance  
7 classification actually were being used by the building contractor  
8 when those had been specified. It is believed that 2-hour fire-  
9 rated ceiling tile and suspended ceiling lay-in board was stamped  
10 on the back with either the initial "KG" or the word "Kaiser  
11 Gypsum." It is believed that this marking was employed during the  
12 entire period that the 2-hour fire-rated products were  
13 manufactured by Kaiser Gypsum.

14 (g) Kaiser Gypsum is unsure as to the intended meaning of  
15 "The U.S. Government's 'Qualified Products List'," but has no  
16 knowledge that any of its 2-hour fire-rated mineral fiberboard  
17 products ever appeared on such a list.

18 (h) Kaiser Gypsum is aware of the following suppliers of  
19 asbestos:

20 John K. Bice  
21 Harrison & Crosfield  
22 Carmonia Chemical Co.  
23 Western Chemical Co.  
24 Philip Carey Corp. (Carey Canadian Asbestos)  
25 Johns-Manville  
26 Union Carbide Corp.  
27 E. S. Browning  
28 Loomis Chemical Co.  
Benson Chemical  
Paul W. Wood (Johns-Manville)

1 Current addresses, if any, are not known to Kaiser Gypsum.  
2 Most of the specific time periods during which these firms  
3 supplied asbestos are unknown.

4 (i) (i through iii) Kaiser Gypsum is not aware of ever  
5 selling such products to shipyards, power companies or refineries.

6 Kaiser Gypsum sold such products to non-governmental customers in  
7 California from approximately 1963 to 1974. These customers  
8 consisted largely of building contractors or building materials  
9 dealers.

10 Kaiser Gypsum has some retained sales orders and sales  
11 invoices for some years which identify the purchasers of Kaiser  
12 Gypsum products, the dates of sale, the amount of each product  
13 sold, and, in some cases, the sites to which the products were to  
14 be delivered. These documents do not distinguish between sales of  
15 asbestos-containing products and other products.

16 (j) Sales orders and sales invoices. See also Response to  
17 Interrogatory 6(b).

18 **IV. Types Of Products Kaiser Gypsum**  
19 **Never Made And Never Marketed**

20 Kaiser Gypsum has never mined, milled or marketed asbestos.  
21 Kaiser Gypsum never designed, manufactured, or marketed any  
22 product in which amosite, crocidolite or other amphibole forms of  
23 asbestos was used as a component. Kaiser Gypsum never designed,  
24 manufactured, or marketed floor tile, pipe insulation or pipe  
25 covering, refractory products, boiler insulation, acoustical  
26 plaster, or sprayed fireproofing or sprayed thermal insulation  
27 products. Kaiser Gypsum never designed, manufactured or marketed  
28 any sort of brake products. It never designed, manufactured or

1 marketed paper products, textile products, or roofing products in  
2 which asbestos was used as a component. Kaiser Gypsum never  
3 designed, manufactured or marketed any products intended for use  
4 in ships or shipyards, or any products intended for use in trains  
5 or other railroad equipment or railroad facilities.

6 V. Null-A-Fire Type-X Gypsum Wallboard -  
7 Allegedly Contaminated Vermiculite Ore

8 This part of Kaiser Gypsum's response, though not directly  
9 called for by the subject interrogatories, is being made in light  
10 of earlier versions of Kaiser Gypsum's responses to these  
11 interrogatories and evolving knowledge, in the context of  
12 historical regulatory uncertainties and disputes about whether  
13 vermiculite ore used as a component in some Kaiser Gypsum Null-A-  
14 Fire Type-X Gypsum Wallboard products may have been contaminated  
15 in a way that caused certain workers to be exposed to airborne  
16 "asbestos." Kaiser Gypsum's position is that no Kaiser Gypsum  
17 Null-A-Fire Type-X Gypsum Wallboard using vermiculite ore as a  
18 component could have been a substantial contributing factor to any  
19 disease caused by exposure to airborne asbestos fibers.

20 As background, in 1954 Kaiser Gypsum introduced Null-A-Fire  
21 brand wallboard, a 5/8" thick gypsum wallboard that was approved  
22 by the Research Committee of the Pacific Coast Building Officials  
23 Conference and certified by the National Board of Fire  
24 Underwriters for a one-hour fire rating. This product was  
25 developed in response to the appearance of California building  
26 code requirements that walls in several types of public buildings  
27 must have such one-hour fire resistance. The term one-hour fire  
28 rating meant that, when used as a wall surface, the gypsum

1 wallboard would resist the passage of flame and heat for at least  
2 one hour. The certified product had to be made in accordance with  
3 Underwriters Laboratories Code No. 3543. Wallboard products that  
4 were fire rated were labeled as "Type X" to distinguish them from  
5 ordinary gypsum wallboard products that had not passed fire-rating  
6 tests.

7 When introduced in 1954, the primary component of Kaiser  
8 Gypsum's Null-A-Fire wallboard was gypsum stucco, which is the  
9 gypsum plaster that forms the greatest percentage by weight of all  
10 gypsum wallboard. Gypsum plaster, including wallboard stucco,  
11 does not burn, and consequently, all gypsum plaster and gypsum  
12 drywall construction poses less risk of fire than does wall  
13 construction featuring wood or plastic paneling. However, the  
14 ordinary 5/8" gypsum wallboard did not pass the one-hour fire  
15 test, because the heat of the test caused the gypsum plaster to  
16 shrink and crack, letting the fire through in less than an hour.  
17 Kaiser Gypsum found that by adding small proportions of glass  
18 fiber and perlite a board could be constructed that would resist  
19 shrinking and cracking under the heat of the fire test for the  
20 required one-hour period. Perlite is a very light substance,  
21 white in color, that looks like puffed breakfast cereal. It is  
22 often used in soil for potted plants to help keep the soil from  
23 caking. Perlite is made by heating little pieces of volcanic  
24 glass to very high temperatures, which causes them to pop like  
25 popcorn.

26 Kaiser Gypsum continued to market its Null-A-Fire Type X  
27 gypsum wallboard products that contained perlite for more than a  
28 decade following their introduction in 1954. However, other

1 manufacturers introduced fire-rated wallboard products that used  
2 vermiculite instead of perlite to provide added fire protection.  
3 Vermiculite is a mica-like mineral found in the ground in a number  
4 of places. In the 1890's it was known by gold prospectors as  
5 "fool's gold," because it sparkled in the sun like precious metal.  
6 Vermiculite does not weigh much, which makes it useful as a  
7 component of construction materials and the melting point of  
8 vermiculite is about 2500 degrees, which makes it valuable as  
9 fireproofing.

10 Vermiculite consists of many layers of thin plates that have  
11 small amounts of water trapped in them. When heated, the water  
12 turns to steam causing these plates to expand. Such expanded  
13 vermiculite is used by nurseries everywhere to help hold air and  
14 moisture in plant soil so that young plants will grow faster and  
15 stronger.

16 Until 1965, Kaiser Gypsum could not use vermiculite to  
17 provide fire protection in gypsum wallboard, because other  
18 companies had secured patents from the United States government  
19 which gave them exclusive rights to use vermiculite in their  
20 gypsum wallboard products. In 1965, Kaiser Gypsum secured patent  
21 licenses from other companies which authorized Kaiser Gypsum to  
22 begin with vermiculite in its wallboard products to provide  
23 increased protection against fire. Kaiser Gypsum then began to  
24 develop such wallboard products and to present them for fire-  
25 testing. Since vermiculite expands when it is heated, vermiculite  
26 used in a wallboard tends to offset the shrinkage that occurs in  
27 gypsum when it is heated, and thus, vermiculite could serve to  
28 help a wallboard to hold its shape and provide the desired fire

1 protection. Because the capacity to expand was desired, the  
2 Kaiser Gypsum products used as the ingredient vermiculite that had  
3 not previously been heat-expanded. This unexpanded vermiculite  
4 was referred to sometimes as vermiculite ore. When testing and  
5 fire code authorities recognized and certified these Kaiser Gypsum  
6 products as fire-rated, or qualified to be marketed as "Type X,"  
7 Kaiser Gypsum began marketing vermiculite-containing gypsum  
8 wallboard under its Null-A-fire brand. Kaiser Gypsum manufactured  
9 limited quantities of 1/2" Null-A-Fire Type X wallboard beginning  
10 in 1967, and began manufacturing 5/8" Null-A-Fire Type X wallboard  
11 in 1969. It continued to market such products until it disposed  
12 of the last of its gypsum business in April 1978. Like other  
13 wallboard products, those Null-A-Fire wallboards consisted  
14 primarily of gypsum plaster. The formulas varied over the years  
15 but the vermiculite ore percentage did not exceed 4% by weight of  
16 the products.

17 Controversy concerning vermiculite reflects the regulatory  
18 proposals published and regulations adopted by the U.S.  
19 Occupational Safety and Health Administration ("OSHA") and the  
20 responses of vermiculite companies to those government actions.  
21 OSHA is a U.S government agency, created by federal legislation in  
22 1970, that adopts and enforces workplace safety and health  
23 regulations. OSHA has been politically controversial from the  
24 beginning. California originally established a parallel state  
25 program administered by its Division of Occupational Safety and  
26 Health, but that agency and program were terminated several years  
27 ago.  
28

1       The federal OSHA undertook to regulate exposure to "asbestos"  
2 in the workplace as one of its first regulatory undertakings, and  
3 OSHA adopted regulations on asbestos in 1972. (See Kaiser  
4 Gypsum's response to Interrogatory No. 15, below.) Thereafter, it  
5 undertook to enforce those regulations. In due course, it began  
6 to threaten manufacturers who used various substances other than  
7 asbestos with charges of violating the OSHA asbestos exposure  
8 regulations. This triggered a long-lasting legal and scientific  
9 dispute concerning what minerals are "asbestos" for purposes of  
10 the OSHA regulations and what minerals should be regulated like  
11 asbestos even if they are not asbestos.

12       In that context, vermiculite supplier W.R. Grace & Co.  
13 (hereinafter "Grace") issued an "Important Notice to Vermiculite  
14 Ore Processors," dated March 17, 1976 warning that "employers of  
15 workers handling vermiculite ore" should be "aware of the OSHA  
16 regulations," because OSHA was applying them to Grace vermiculite  
17 plants and proposed to make the regulation of dust more strict  
18 under the regulations. Grace stated that the issues related to  
19 vermiculite reflected a "tramp" mineral "found in vermiculite  
20 deposits" named "tremolite, defined by OSHA as one of the asbestos  
21 family." Disputes over these OSHA proposals persisted for years.  
22 Then, on June 20, 1986, OSHA published in the Federal Register (at  
23 51 Fed. Reg. 22612) a "Final Rule" that defined "asbestos" to  
24 include "tremolite" and applied asbestos exposure limits and  
25 warnings to tremolite. However, shortly thereafter those  
26 regulations were "stayed," that is, not made effective, by OSHA as  
27 to tremolite and several other minerals to prevent the federal  
28 courts from deciding whether the regulations were "arbitrary and

1 capricious." (See 51 Fed. Reg. 37002; Oct. 17, 1986.) The  
2 scientific and regulatory debate continued for more years until  
3 OSHA published regulations in 1992 (57 Fed. Reg. 24310; June 8,  
4 1992) declaring that some tremolite is "platy" or non-fibrous, and  
5 "platy tremolite" would not be deemed to be asbestos.

6 However, OSHA found other tremolite was fibrous or  
7 "asbestiform" and that such "asbestiform tremolite" would be  
8 regulated as asbestos. OSHA further limited these regulations by  
9 providing that even products with asbestiform tremolite would not  
10 be subject to asbestos regulation if asbestiform tremolite "is  
11 present in a product in concentrations less than 1.0 percent by  
12 weight."

13 Kaiser Gypsum admits that for a limited number of years some  
14 of its Null-A-Fire products contained vermiculite, but Kaiser  
15 Gypsum denies that these products contained asbestiform tremolite.  
16 Kaiser Gypsum further contends that any attempt under state law to  
17 deem any products that have less than the amount that would  
18 subject them to federal regulation to be asbestos-containing  
19 products would be preempted by federal law and the Supremacy  
20 Clause of the U.S. Constitution.

21 RESPONSE TO INTERROGATORY NO. 11:

22 Not applicable.

23 RESPONSE TO INTERROGATORY NO. 12:

24 Kaiser Gypsum is unaware of entering into any such rebranding  
25 agreements.

26 RESPONSE TO INTERROGATORY NO. 13:

27 During 1952 Kaiser Gypsum purchased Joint Cement, Cover-Tex  
28 texture paint and Kaiser-Tex texture paint from Wesco Waterpaints,

1 Inc., then located in Berkeley, California, that was packaged in  
2 Kaiser Gypsum's name. It is unknown to Kaiser Gypsum whether  
3 asbestos was used as a component of those products. During  
4 December 1953, after Kaiser Gypsum began manufacturing joint  
5 compounds and texture paints, Kaiser Gypsum entered into an  
6 agreement with Wesco Waterpaints, Inc., then located in Berkeley,  
7 California, to purchase joint cement, topping compound and texture  
8 paint packaged in Kaiser Gypsum's name for a period of 90 days.  
9 It is unknown to Kaiser Gypsum whether any purchases were made  
10 pursuant to this agreement or whether any products purchased had  
11 asbestos as a component. In an abundance of caution, Kaiser  
12 Gypsum is providing the information it has obtained from its  
13 records. Kaiser Gypsum has no information demonstrating that any  
14 product obtained from Wesco Waterpaints, Inc. was an asbestos-  
15 containing product. Kaiser Gypsum knows of no other agreement  
16 entered by it that provided for rebranding any product of another  
17 company's which may have been an asbestos-containing product in  
18 Kaiser Gypsum's name for sale in California.

19 RESPONSE TO INTERROGATORY NO. 14:

20 Kaiser Gypsum did not purchase or acquire asbestos from the  
21 "General Service Administration" or any branch or agency of the  
22 United States Government.

23 RESPONSE TO INTERROGATORY NO. 15:

24 Yes, as to products marketed in 1972 or thereafter.

25 (a) Beginning in 1972, in response to regulations adopted by  
26 the U.S. Occupational Safety and Health Administration (see 37  
27 Fed. Reg. 11318, June 7, 1972), Kaiser Gypsum affixed caution  
28 labels to the packages and containers of its asbestos-containing

1 products. The OSHA regulations requiring this label were made  
2 subject to the limitation that "no label is required where  
3 asbestos fibers have been modified by a bonding agent, coating,  
4 binder, or other material so that during any reasonably  
5 foreseeable use, handling, storage, disposal, processing, or  
6 transportation, no airborne concentrations of asbestos in excess  
7 of the exposure limits prescribed in paragraph (b) of this section  
8 will be released." In light of then-existing ambiguities as to  
9 what tests OSHA would recognize as adequate to demonstrate a  
10 product's falling within this exception, Kaiser Gypsum applied the  
11 caution label to all its then-manufactured products in which  
12 chrysotile asbestos was used as a component.

13 Initially, the labels were four inches by eight inches in  
14 size and had yellow backgrounds with red letters. They were  
15 affixed to the bag or container of the product by adhesive in a  
16 prominent place. Later, as new bags and containers were  
17 purchased, the labels were printed onto the side of the bag or  
18 container and are believed to have been the same color or colors  
19 as the bag/container or the printing thereon. The label read:

20 CAUTION: contains asbestos fibers; avoid  
21 creating dust; breathing asbestos dust may  
22 cause serious bodily harm.

23 (b) Beginning in 1972; exact date unknown.

24 (c) This label caution remained the same during the  
25 remaining time the products upon which it was used continued to  
26 use asbestos as a component.

27 RESPONSE TO INTERROGATORY NO. 16:

28 Not applicable.

1 RESPONSE TO INTERROGATORY NO. 17:

2 Most of Kaiser Gypsum's products were sold in the form of a  
3 powder or paste; therefore, the name of the company was on the  
4 packaging of the product. However, Kaiser Gypsum's 2-hour fire-  
5 rated ceiling tiles and suspended ceiling lay-in board products  
6 (in which asbestos was used as a component were specially marked  
7 because they looked similar to other Kaiser Gypsum mineral  
8 fiberboard ceiling tiles and lay-in boards (that did not contain  
9 asbestos as a component) and building inspectors wanted to be able  
10 to check to make sure that 2-hour fire-rated products actually  
11 were being used by the building contractor when those had been  
12 specified. It is believed that each piece of 2-hour fire-rated  
13 ceiling tile and suspended ceiling lay-in board was stamped on the  
14 back with either the initial "KG" or the word "Kaiser Gypsum."  
15 Such marking was employed during the entire period that the 2-hour  
16 fire-rated products were manufactured by Kaiser Gypsum.

17 RESPONSE TO INTERROGATORY NO. 18:

18 Harlan C. Dupuis, former Manager of Research and Development,  
19 was deposed on April 16, 1985, in the following case: Katherine  
20 Maksim v. U.S. Gypsum, et al., San Francisco County Superior Court  
21 No. 768674.

22 Melissa A. Youngman, former Secretary/Treasurer, was deposed  
23 on March 4 and 5, 1993, in the following cases: Donald Breslin v.  
24 ABEX, et al., San Francisco County Superior Court, Case No.  
25 943928; Coy Cossey v. ABEX, et al., San Francisco County Superior  
26 Court, Case No. 920148; Norma E. Olsen v. ABEX, et al., San  
27 Francisco County Superior Court, Case No. 914076; Lynn Weimer v.  
28 ABEX, et al., San Francisco County Superior Court, Case No.

1 914594; and Ray Person v. ABEX, et al., San Francisco County  
2 Superior Court, Case No. 944872.

3 Thomas V. Smith, former Technical Supervisor for Accessory  
4 Products, was deposed on March 11, 1992, in the following case:  
5 Michael F. Richie, et al. v. Raybestos-Manhattan, et al., Superior  
6 Court of the State of California for the County of San Francisco,  
7 Civ. 933324.

8 **RESPONSE TO INTERROGATORY NO. 19:**

9 Kaiser Gypsum has no knowledge that it ever purchased or  
10 otherwise acquired an asbestos-containing product line from  
11 another company.

12 **RESPONSE TO INTERROGATORY NO. 20:**

13 Kaiser Gypsum has retained a number of brochures, pamphlets,  
14 catalogs and other product information documents. Many of these  
15 documents discuss both asbestos-containing products and other  
16 products, and many of the documents are similar. For these  
17 reasons, rather than attempting to identify each individual  
18 document, Kaiser Gypsum will make representative documents  
19 available for inspection upon reasonable notice at the offices of  
20 Dillingham & Murphy, 225 Bus, 6th Floor, San Francisco,  
21 California.

22 (a) through (c) - See statement above.

23 (d) To provide potential users of such products with  
24 information about the products.

25 (e) Some of these documents still exist.

26 (f) See above statement.

27 (g) See Response to Interrogatory No. 6(b).

1 RESPONSE TO INTERROGATORY NO. 21:

2 Not applicable.

3 RESPONSE TO INTERROGATORY NO. 22:

4 No, not to Kaiser Gypsum's knowledge.

5 RESPONSE TO INTERROGATORY NO. 23:

6 The interrogatories define "contract unit" to "mean a branch  
7 or division of a defendant which has been or is now engaged in  
8 installation and/or removal of 'raw asbestos fibers' and/or  
9 'asbestos-containing products'." Kaiser Gypsum never has had such  
10 a unit.

11 RESPONSE TO INTERROGATORY NO. 24:

12 Not applicable.

13 RESPONSE TO INTERROGATORY NO. 25:

14 Kaiser Gypsum had product liability insurance during the  
15 period of time it manufactured or sold asbestos-containing  
16 products.  
17  
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1 RESPONSE TO INTERROGATORY NO. 26:

2 (a)-(d) Kaiser Gypsum is insured under a number of general  
3 corporate liability insurance policies that were issued by primary  
4 insurance carriers, including Truck Insurance Exchange, Fireman's  
5 Fund, The Home Insurance Company and National Union Insurance  
6 Company, which Kaiser Gypsum maintains provide coverage for  
7 personal injury claims. Certain policy terms and conditions are  
8 subject to disputes between Kaiser Gypsum and its carriers.

9 Kaiser Gypsum also believes that it is insured under a number of  
10 excess liability insurance policies that were issued by a number  
11 of different insurance carriers, including some that may no longer  
12 be capable of responding to their obligations. The terms and  
13 conditions of these excess policies may be subject to dispute.

14 Kaiser Gypsum will supplement this response in the event the  
15 circumstances in a particular case may make more detailed  
16 information on insurance policies of relevance, taking into  
17 account the carrier and dispute resolution status pertaining at  
18 that time.

19 DATE: 12/30/56

DILLINGHAM & MURPHY

20 By:

E. Jane Wells  
21 PATRICK J. HAGAN, ESQ.

22 E. JANE WELLS, ESQ.  
23 Attorneys for Defendant  
24 Kaiser Gypsum Company, Inc.  
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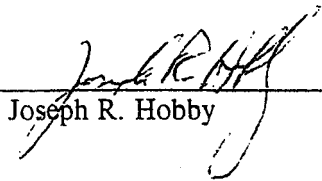
VERIFICATION

I, the undersigned say:

I have read the foregoing document; to the extent that the information set forth in the foregoing document is personally known to me, the information is true and correct to the best of my knowledge; to the extent that the information set forth in the foregoing document is not known to me but is required by law to be provided in said responses, I believe the responses to be correct; to the extent that the responses state legal objections, the responses have been prepared by my attorneys based on their work product and other information known to them, and are not within my personal knowledge.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed this 27 day of December, 1996, at San Ramon, California.

  
\_\_\_\_\_  
Joseph R. Hobby

Kaiser Gypsum Company, Inc.'s  
Updated Responses to Plaintiffs'  
Standard Interrogatories to  
Defendants  
In Re: San Francisco Superior Court  
Complex Asbestos Litigation

1                   PROOF OF SERVICE BY MAIL [C.C.P. 1013a, 2015.5]

2                   I, the undersigned, declare:

3                   That I am employed in the City of San Francisco, County  
4 of San Francisco, State of California; that I am over the age of  
5 eighteen years and not a party to the within cause; that my  
6 business address is 625 Market Street, Fourteenth Floor, San  
7 Francisco, California 94105-3315.  
8

9                   That on today's date I served the attached:

10                   **KAISER GYPSUM COMPANY, INC.'S UPDATED RESPONSES TO**  
11                   **PLAINTIFF'S STANDARD INTERROGATORIES TO DEFENDANTS**

12 on the parties in said cause, by placing a true copy of each  
13 document enclosed in a sealed envelope with postage thereon fully  
14 prepaid, in the United States mail at San Francisco, California,  
15 addressed as follows:  
16

17                   Alan R. Brayton, Esq.  
18                   Brayton Harley Curtis  
19                   222 Rush Landing  
20                   P.O. Box 2109  
21                   Novato, CA 96723

22                   (see also attached service list)

23                   I declare under penalty of perjury under the laws of  
24 the State of California that the foregoing is true and correct.

25                   Dated: December 30, 1996

26                   Christine Willis  
27                   Christine Willis

**IN RE COMPLEX ASBESTOS LITIGATION**  
**PLAINTIFFS' COUNSEL SERVICE LIST**

|                                                                                                               |                   |
|---------------------------------------------------------------------------------------------------------------|-------------------|
| Bruce L. Ahnfeldt, Esq., P.O. Box 6078, Napa, CA 94581                                                        | 707-224-6547      |
|                                                                                                               | Fax: 707-224-2518 |
| Law Offices of Marc C. Barulich, 1721 Court Street, Redding, CA 96001                                         | 916-244-0988      |
| Brayton Harley Curtis, 222 Rush Landing, P.O. Box 2019, Novato, CA 94948                                      | 415-898-1555      |
|                                                                                                               | Fax: 415-898-1247 |
| Casey, Gerry, Casey, Westbrook, Reed & Schenk, 110 Laurel Street, San Diego, CA 92101, Attn: Frederick Schenk | 619-238-1811      |
| Law Offices of Jack K. Clapper, 62 Princess Street, Sausalito, CA 94965                                       | Fax: 619-544-9232 |
|                                                                                                               | 415-332-4262      |
|                                                                                                               | Fax: 415-331-5387 |
| Law Offices of Frank H. Finney, 2033 North Main Street, Suite 430, Walnut Creek, CA 94596                     | 510-256-3307      |
|                                                                                                               | Fax: 510-256-3308 |
| Law Offices Of Christopher E. Grell, 685 Market Street, Suite 540, San Francisco, CA 94105                    | 415-541-9866      |
|                                                                                                               | Fax: 415-541-9869 |
| Visse & Yanez, LLP, One Daniel Burnham Court, Suite 220-C, San Francisco, CA 94109-5460                       | 415-441-1707      |
|                                                                                                               | Fax: 415-441-0340 |
| George W. Kilbourne, Esq., 661 Augusta Drive, Moraga, CA 94556                                                | 510-372-3304      |
| Kenneth L. Knapp, Esq., 1109 Quail Street, Newport Beach, CA 92660                                            | 714-851-1200      |
| Law Offices of J. Kenneth Lynch, One Sansome Street, Suite 2100, San Francisco, CA 94105                      | 415-951-4616      |
|                                                                                                               | Fax: 415-951-4653 |
| McCarthy, Johnson & Miller, 595 Market Street, Suite 2200, San Francisco, CA 94105                            | 415-882-2992      |
| Law Offices of John C. Robinson, 365 Notre Dame Drive, Vallejo, CA 94589                                      | 707-554-2393      |
|                                                                                                               | Fax: 707-554-2394 |
| Robles & Gonzales, One Bayfront Plaza, Suite 900, 100 S. Biscayne Boulevard, Miami, FL 33131                  | 305-371-5944      |
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**IN RE: COMPLEX ASBESTOS LITIGATION**  
**Defense Counsel Service List**

Revised 1/16/96

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Sears, Roebuck & Co./Potter Electric/Burt Williams & Son, Inc./Crossfield Products Corp./  
Plumbers Specialty Co., Inc./Broadway-Webster Medical Plaza/Qualitex Co., Inc./Janos Industrial  
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Lumber Co./Ohio Casualty Group/Carlisle Corp./Cahill Construction Co./Durant Insulated Pipe Co./  
Anning-Johnson Co./Victor Equipment Co./Cathedral Hill Hotel, Inc./Anderson, Rowe & Buckley/  
Waldron, Duffy, Inc./Ireland-Robinson & Hadley, Inc./Dillingham Construction N.A., Inc./Ross Island  
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 On behalf of: McDonnell Douglas Corp./Levi Strauss & Co./Schlage Lock/C.F. Braun/Oscar E. Erickson/  
 Ingersoll-Rand Co./J.P. Stevens & Co., Inc./D. Zelinsky & Sons, Inc./The Dial Corp./Superior Boiler Works  
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 On behalf of: St. Francis Hotel/Selas Corporation of America/Home Savings of America  
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 On behalf of: Terminal Air Brake Supply, Inc.

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On behalf of: E.V. Roberts & Associates, Inc./Acousta-Lite/Floorcraft/El Camino Parts Co./Claude Short  
Dodge/Guy F. Atkinson Co./Keystone Consolidated Industries/Power Boiler Sales, Inc./Delmer's Brakes/  
Wisner & Becker Contracting Engineers/Archie Brothers, Inc./Cleaver Brooks, A Division of Aqua-Chem/  
Pacific Mechanical Corp./Coca-Cola Co./Venton Plastering/South Bay Taping/Western States Stone Co.  
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Bridgestone/Firestone, Inc./Union Pacific Railroad Co./Lincoln Electric Co./F.P. Lathrop Construction Co.  
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On behalf of: Todd Shipyard/Mervyn's/Pierce Enterprises/American Standard, Inc./Trane Co./  
Railroad Friction Products Corp./Colombini Construction  
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 On behalf of: Kaiser Cement Corp./Kaiser Gypsum Co., Inc./Gasket Specialties, Inc./  
 P.E. Dolan Lumber Co./Goulds Pumps, Inc.  
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 On behalf of: USX Corp.  
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 San Francisco, CA 94111, Attn: Lawrence Margoles Fax: 415/362-0638  
 On behalf of: Figgie International, Inc./Ford Motor Co./Sherwin-Williams Co./Phillips Petroleum Co./  
 Mack Trucks, Inc./O'Brien Corp./Capco Pipe Co., Inc./Jaguar Cars  
 Duncan, Ball, Evans & Ubaldi, 641 Fulton Avenue, Second Floor, Sacramento, 916/488-1666  
 CA 95825, Attn: Jerry M. Duncan Fax: 916/488-1699  
 On behalf of: Mercy San Juan Hospital  
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 On behalf of: B.F. Goodrich Co./Natkin & Co.  
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 San Francisco, CA 94111-4803, Attn: Andrew P. Sclar Fax: 415/362-6401  
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 On behalf of: Flintkote/Genstar/Blue Diamond  
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 On behalf of: Napa Glove Co., Inc. Fax: 707/643-1910  
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 On behalf of: Ellis Corporation  
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 On behalf of: Motor Parts Distributors

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 Batteries & Accessories/Anchor Packing Co./Lockheed Shipbuilding Co./Tri Valley Growers/Paccar  
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 On behalf of: E.I. du Pont de Nemours & Co.  
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 On behalf of: Nebraska Boiler Co., Inc./J.W. & Sons/L.N. Curtis & Sons/Western Building Materials/  
 Fraser-Edwards Co./Holloway & Freeman, Inc.  
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 On behalf of: Bendix (Allied Corp.)/Allied-Signal, Inc.  
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 On behalf of: W.R. Grace & Co. - Conn.  
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 On behalf of: Sealift, Inc./Mobil Oil/Goodyear Tire & Rubber Co./Amerada Hess/Alcoa Co./Hendy International/  
 Matson Navigation Co./Pacific Coast Shipping/Waterman Steamship Co./Chevron/Weyerhaeuser/Lykes Bros./  
 Crowley Maritime Co./National Bulk Carriers/Mormac Marine/Sea-Land Service, Inc./Victory Carriers/  
 Keystone Shipping Co./Delta Lines/Central Gulf Shipping/Marine Transport Lines/Farrell Transport Lines/  
 Nedlloyd Lines/Bay Tankers/Interocean Management/Maritime Overseas Corp./OMI Bulk Management Co./  
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 On behalf of: American Cyanamid

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 On behalf of: CCR Defendants/Ohio Locomotive Crane Co./Lord Corporation/MCA/Universal City Studios, Inc./  
 San Francisco Sourdough Bakeries, Inc./Tarkett, Inc.  
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 On behalf of: Oakfabco/Harwick Chemical Corp./Complete Auto Parts/Hartford Fire Insurance/  
 Hartford Accident & Indemnity Co./University of Southern California/E.D. Bullard/Bell Industries/  
 J.H. Fitzmaurice, Inc./Kahala Hilton Hotel/Mortell Company  
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 On behalf of: ICI Composites, Inc./ICI Americas, Inc.  
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 On behalf of: Rhone-Poulenc Basic Chemicals Co. (Stauffer Chemical)  
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131  
 94612, Attn: Bruce McLeod/Peter A. Strotz Fax: 510/839-7940  
 On behalf of: The Dow Chemical Company  
 Hardin, Cook, Loper, Engel & Bergez, 1999 Harrison St., 18th Floor, Oakland, CA 510/444-3131  
 94612, Attn: Marshall A. Thompson Fax: 510/839-7940  
 On behalf of: Alta Building Materials Company  
 Hardy Erich Brown & Wilson, 1000 G Street, Sacramento 95814, Mailing: P.O. Box 916/449-3800  
 13530, Sacramento, CA 95853-4530, Attn: Brian Charter Fax: 916/449-3888  
 On behalf of: Goodyear Tire & Rubber Co./The Dexter Corporation/McPhail's, Inc.  
 Brett R. Harrell, P.O. Box 1130, Modesto, CA 95353 209/579-3717  
 On behalf of: E. & J. Gallo Winery Fax: 209/579-3719  
 Harrington, Foxx, Dubrow & Canter, 611 W. Sixth St., 30th Floor, Los Angeles, CA 213/489-3222  
 90017, Attn: William H. Finney Fax: 213/623-7929  
 On behalf of: Ford Motor Co./Navistar International Transportation Co.  
 Hassard Bonnington, Two Embarcadero Center, Suite 1800, San Francisco, CA 415/288-9800  
 CA 94111-3993, Attn: Robert M. Hamblett Fax: 415/288-9801  
 On behalf of: Kaiser Hospitals, Inc./El Camino Hospital/Golden Gateway Building Co./Golden Gateway  
 Holding Corp./Perini Land & Development Co./Paramount Development Assoc.  
 Hefner, Stark & Marois, 2710 Gateway Oaks Drive, Suite 300 South, Sacramento, 916/925-6620  
 CA 95833, Attn: Stephen S. Talt Fax: 916/925-1127  
 On behalf of: Kirkhill Rubber Company  
 Heller, Ehrman, White & McAuliffe, 333 Bush Street, San Francisco, CA 94104-2878 415/772-6000  
 Attn: Ann G. Grimaldi Fax: 415/772-6268  
 On behalf of: Wiegmann & Rose International/Pennzoil Company  
 Hill, Farrer & Burrill, 445 South Figueroa Street, 35th Floor, Los Angeles, CA 90071 213/620-0460  
 Attn: Craig J. Whitney Fax: 213/624-4840  
 On behalf of: Atchison, Topeka & Santa Fe Railroad Co.  
 Hill, Genson, Even, Crandall & Wade, 505 Shatto Place, Los Angeles, CA 90020 818/999-4811  
 Attn: Gene Genson Fax: 213/380-8946  
 On behalf of: Uniroyal, Inc.

|                                                                                                                                                                                                                                                                                                                                                                                                                          |                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Hoge, Fenton, Jones & Appel, Inc., 60 South Market St., Suite 1400, San Jose, CA 95113-2396, Attn: Nora Frimann                                                                                                                                                                                                                                                                                                          | 408/287-9501<br>Fax: 408/287-2583 |
| On behalf of: The Austin Company/American Rubber Manufacturing Co./Container Corp. Of America                                                                                                                                                                                                                                                                                                                            |                                   |
| Howarth & Smith, 700 South Flower Street, Suite 2900, Los Angeles, CA 90017                                                                                                                                                                                                                                                                                                                                              | 213/955-9400                      |
| Attn: Thomas F. Vandenburg                                                                                                                                                                                                                                                                                                                                                                                               | Fax: 213/622-0791                 |
| On behalf of: Georgia-Pacific Corporation                                                                                                                                                                                                                                                                                                                                                                                |                                   |
| Howrey & Simon, 550 South Hope Street, Suite 1400, Los Angeles, CA 90071                                                                                                                                                                                                                                                                                                                                                 | 213/892-1800                      |
| Attn: Kathryn M. Conway                                                                                                                                                                                                                                                                                                                                                                                                  | Fax: 213/892-2300                 |
| On behalf of: Mohawk Flush Doors, Inc.                                                                                                                                                                                                                                                                                                                                                                                   |                                   |
| Hudgins & Hunt, 135 Main Street, Suite 1350, San Francisco, CA 94105                                                                                                                                                                                                                                                                                                                                                     | 415/979-0100                      |
| Attn: Kevan T. Hunt                                                                                                                                                                                                                                                                                                                                                                                                      | Fax: 415/979-0747                 |
| On behalf of: Uniroyal, Inc.                                                                                                                                                                                                                                                                                                                                                                                             |                                   |
| Law Offices of Michael R. Hudson, 500 Sansome Street, Suite 601, San Francisco, CA 94111, Attn: Michael R. Hudson                                                                                                                                                                                                                                                                                                        | 415/882-1556<br>Fax: 415/986-1430 |
| On behalf of: Skinner Corporation                                                                                                                                                                                                                                                                                                                                                                                        |                                   |
| Hyde & Holcomb, 1646 North California Blvd., Suite 550, Walnut Creek, CA 94596                                                                                                                                                                                                                                                                                                                                           | 510/939-7700                      |
| Attn: Patrick J. Hyde                                                                                                                                                                                                                                                                                                                                                                                                    | Fax: 510/939-2248                 |
| On behalf of: The Clorox Company                                                                                                                                                                                                                                                                                                                                                                                         |                                   |
| Timothy M. Hyden, Attorney at Law, 18 Crow Canyon Ct., #380, San Ramon, CA 94583                                                                                                                                                                                                                                                                                                                                         | 510/831-0636                      |
| On behalf of: Economy Rubber & Gasket, Inc.                                                                                                                                                                                                                                                                                                                                                                              | Fax: 510/831-8483                 |
| Imai, Tadlock & Keeney, 180 Montgomery St., Suite 1000, San Francisco, CA 94104                                                                                                                                                                                                                                                                                                                                          | 415/989-8687                      |
| Attn: Robert C. Keeney/Edgar Hawkyard                                                                                                                                                                                                                                                                                                                                                                                    | Fax: 415/989-7640                 |
| On behalf of: A.W. Chesteron Co./George Raymond Co./Raymond Interior Systems-North                                                                                                                                                                                                                                                                                                                                       |                                   |
| Imai, Tadlock & Keeney, 180 Montgomery St., Suite 1000, San Francisco, CA 94104                                                                                                                                                                                                                                                                                                                                          | 415/989-8687                      |
| Attn: Theodore T. Cordery                                                                                                                                                                                                                                                                                                                                                                                                |                                   |
| On behalf of: See's Candies/Campbell Soup Co./Simpson Paper Co./Humboldt Bay Pulp Co./Elliott Co./Rich-Tex, Inc./Basic Vegetable Products/James River Corp./Anchor Hocking Co.                                                                                                                                                                                                                                           |                                   |
| Jackson, Tufts, Cole & Black, 650 California Street, San Francisco, CA 94108                                                                                                                                                                                                                                                                                                                                             | 415/433-1950                      |
| Attn: Lynn A. Starr                                                                                                                                                                                                                                                                                                                                                                                                      | Fax: 415/392-3494                 |
| On behalf of: Fort Kent Holdings, Inc.                                                                                                                                                                                                                                                                                                                                                                                   |                                   |
| Jackson & Wallace, 580 California Street, 15th Floor, San Francisco, CA 94104                                                                                                                                                                                                                                                                                                                                            | 415/982-6300                      |
| Attn: John R. Wallace                                                                                                                                                                                                                                                                                                                                                                                                    | Fax: 415/982-6700                 |
| On behalf of: New York Life Insurance Co./Fluor Corp./Radiator Specialty/Landor & Associates/Ferro Corp./Kraft General Foods, Inc./Milwhite, Inc./M. Slayen & Associates/Republic Supply Co./Fraser's Boiler Service/The Okonite Co./Plant Insulation Co./Armco, Inc./Chicago Firebrick Co./Alfred Dunhill of London/Wale Apparatus Co./Hamon Cooling Tower Co./Bethlehem Apparatus/Crown Zellerbach International, Inc. |                                   |
| Jaffe, Trutanich, Scatena & Blum, 155 Sansome Street, Suite 700, San Francisco, CA 94104, Attn: Michelle M. Lambre                                                                                                                                                                                                                                                                                                       | 415/397-9006<br>Fax: 415/397-1339 |
| On behalf of: KSC Recovery                                                                                                                                                                                                                                                                                                                                                                                               |                                   |
| Jedeikin, Green, Meadows & Schneider, 300 Montgomery Street, Suite 450, San Francisco, CA 94111, Attn: Joseph Jedeikin                                                                                                                                                                                                                                                                                                   | 415/781-7050<br>Fax: 415/421-5658 |
| On behalf of: City National Bank/Sunset Homes, Inc./Bryan Steam Corp./E. & J. Gallo Winery/Heublein/Beaulieu Vineyards                                                                                                                                                                                                                                                                                                   |                                   |
| Jeffrey & Heinemann, 685 Market Street, Suite 330, San Francisco, CA 94105                                                                                                                                                                                                                                                                                                                                               | 415/543-8970                      |
| On behalf of: Burnham Corporation                                                                                                                                                                                                                                                                                                                                                                                        | Fax: 415/543-2670                 |
| Jones, LaMore, Brazier & Riddle, 1570 The Alameda, Suite 150, San Jose, CA 95126-2306, Attn: James C. Jones                                                                                                                                                                                                                                                                                                              | 408/280-6800<br>Fax: 408/275-6284 |
| On behalf of: Caterpillar, Inc.                                                                                                                                                                                                                                                                                                                                                                                          |                                   |
| Jordan, Keeler & Seligman, Two Embarcadero Center, 19th Floor, San Francisco, CA 94111-3984, Attn: David H. Gartshore                                                                                                                                                                                                                                                                                                    | 415/397-4600<br>Fax: 415/392-2059 |
| On behalf of: Stone & Webster Engineering Corporation                                                                                                                                                                                                                                                                                                                                                                    |                                   |
| Kaufman & Logan, 111 Pine Street, Suite 1300, San Francisco, CA 94111                                                                                                                                                                                                                                                                                                                                                    | 415/392-6677                      |
| Attn: Peter J. Logan                                                                                                                                                                                                                                                                                                                                                                                                     | Fax: 415/391-4639                 |
| On behalf of: First Interstate Bank                                                                                                                                                                                                                                                                                                                                                                                      |                                   |
| Keck, Mahin & Cate, One Maritime Plaza, 23rd Floor, San Francisco, CA 94111-3577                                                                                                                                                                                                                                                                                                                                         | 415/392-7077                      |
| Attn: Robert E. Paterson                                                                                                                                                                                                                                                                                                                                                                                                 | Fax: 415/392-3965                 |
| On behalf of: Abex Corporation/Wheelabrator Group, Inc.                                                                                                                                                                                                                                                                                                                                                                  |                                   |

Keesal, Young & Logan, Four Embarcadero Center, Suite 1500, San Francisco, 415/989-0616  
 CA 94111, Attn: Robert A. Bleicher Fax: 415/981-7729  
 On behalf of: Lear Siegler Diversified Holdings Corp./Progresso Foods Co./Pullman Standard, Inc./  
 Tillie Lewis Foods, Inc./Tishman Realty Construction Co./The Pullman Company  
 Kenney, Burd & Markowitz, Two Embarcadero Center, Suite 470, San Francisco, 415/397-3100  
 CA 94111, Attn: Stephen C. Kenney Fax: 415/397-3170  
 On behalf of: BP Chemicals  
 Kinder, Wuerfel & Cholakian, 555 Montgomery St., 9th Floor, San Francisco, 415/398-1551  
 CA 94111, Attn: Edwin S. Nakagawa Fax: 415/398-3301  
 On behalf of: Yoliand Materials Co.  
 Kinsella, Boesch, Fujikawa & Towle, 1901 Avenue of the Stars, 7th Floor, 310/201-2000  
 Los Angeles, CA 90067, Attn: Leonard M. Tavera Fax: 310/284-6020  
 On behalf of: Parker-Hannifin Corp./EIS Division  
 Knight, Boland & Riordan, 88 Kearny Street, Suite 1310, San Francisco, CA 94104 415/362-0684  
 Attn: Samuel G. Ware Fax: 415/956-2750  
 On behalf of: Metropolitan Life Insurance Co.  
 Knox, Lemmon, Anapolsky & Sheridan, 300 Capitol Mall, Suite 1170, Sacramento, 916/448-9911  
 CA 95814, Attn: Susan J. Sheridan Fax: 916/448-2566  
 On behalf of: Kenworth Trucking Co.  
 Knox Rickson, 1999 Harrison Street, Suite 1700, Oakland, CA 94612 510/893-1000  
 Attn: Stephen S. Harper Fax: 510/446-1946  
 On behalf of: Combustion Engineering/Syntex Corp./Oshkosh Truck Corp./Meyers Chemicals/  
 Wells Fargo Bank/Glidden Co./Southwestern Portland Cement  
 Lafayette, Kumagai & Clarke, 100 Spear St., Suite 400, San Francisco, CA 94105 415/357-4600  
 Attn: Kevin M. Clarke Fax: 415/896-0683  
 On behalf of: Procter & Gamble/Folger Coffee Co./Kmart Corporation  
 La Follette, Johnson, De Haas, Fesler & Ames, 50 California Street, 35th Floor, 415/433-7610  
 San Francisco, CA 94111, Attn: Joanne Rosendin Fax: 415/392-7541  
 On behalf of: Grefco, Inc./General Refractories Co.  
 La Follette, Johnson, De Haas, Fesler & Ames, 50 California Street, 35th Floor, 415/433-7610  
 San Francisco, CA 94111, Attn: Kelley Reid Fax: 415/392-7541  
 On behalf of: Gentex Corp.  
 Landels, Ripley & Diamond, 350 Steuart Street, San Francisco, CA 94105-1250 415/788-5000  
 Attn: Morgan Gilhuly Fax: 415/788-7550  
 On behalf of: J.R. Simplot/Stanford University Hospital/Stanford University  
 Lane Powell Spears & Lubersky, Two Embarcadero Center, Suite 2330, 415/421-8624  
 San Francisco, CA 94111, Attn: Kevin C. Mayer Fax: 415/421-8625  
 On behalf of: Hercules, Inc./Mobil Oil Corp./Hofmann Co./Chevron/Ashland, Inc.  
 Larson & Burnham, 1901 Harrison St., 11th Fl., Oakland 94612, Mailing: P.O. Box 119, 510/444-6800  
 Oakland, CA 94604, Attn: Walter Rundin Fax: 510/835-6666  
 On behalf of: D.W. Nicholson Corp./Golden Gate Drywall, Inc./State Shingle Co./Jack Horton Drywall, Inc./  
 McGuire & Hester/General Veneer Mfg. Co./Hyatt Corp./Frank E. Connell & Son/Coast Sheet Metal/  
 J&H Marine & Industrial Engineering Co./California Drywall Co./Walworth Co./Prudential Insurance Co./  
 Carter Construction Co./Daniel Smith Plastering, Inc./Victor Kemp Co./Frederick Meiswinkel, Inc./  
 Whittaker Corp./Borg-Warner Corp./Mannington Mills/Hilton Hotels Corp./California Shingle & Shake Co./  
 Goodman Lumber Co./Baker's Pride Oven Co., Inc./Great Western Bank/Medallion Carpets/Univar Corp./  
 Reynolds Metals Co./W.F. Hayward Co./Fruehauf Trailer Corp./Borg-Warner Automotive, Inc./  
 Central Supply Co.  
 Le Bouef, Lamb, Greene & MacRae, One Embarcadero Center, San Francisco, 415/951-1100  
 CA 94111, Attn: Lorraine A. Barrabee Fax: 415/951-1180  
 On behalf of: Alcoa Company  
 Lemieux & O'Neill, 200 North Westlake Blvd., Suite 100, Westlake Village, 805/495-4770  
 CA 91362-3755, Attn: Tari L. Cody Fax: 805/495-2787  
 On behalf of: OFCCO Construction, Inc. (Oil Field Construction Company, Inc.)  
 Lewis, D'Amato, Brisbois & Bisgaard, 221 North Figueroa Street, Suite 1200, 213/250-1800  
 Los Angeles, CA 90012, Attn: Steven Mark Levy Fax: 213/250-7900  
 On behalf of: American Standard, Inc./Prudential Insurance

Liebman, Reiner, & Walsh, 3255 Wilshire Blvd., 12th Floor, Los Angeles, CA 90010, Attn: Craig Nelson Fax 213/387-0777  
 On behalf of: Riverside Cement Co. (Amcord, Inc.) Fax 213/383-6754  
 Lossing & Elston, 100 First Street, 25th Floor, San Francisco, CA 94105 Fax 415/882-4200  
 Attn: Kevin Gray Fax 415/882-4050  
 On behalf of: Hunt-Wesson, Inc. Fax 415/981-6630  
 Low, Ball & Lynch, 601 California Street, San Francisco, CA 94108 Fax 415/982-1634  
 Attn: Celeste M. Scott  
 On behalf of: Beck Electric Supply/J.A. Sexauer/The Montague Co./Groeniger & Co./Scott Company/  
 Moore Dry Dock Co./E.F. Mitchler/San Jose Drywall Corp./Atlas Heating & Ventilating Co., Ltd./  
 Johnson & Mape Construction Co./Douglass Insulation Co., Inc./The Branson School/Sono-Ceil Co./  
 MBL, Inc./John Ray Co./Dyson-Kissner-Moran Corp./Brown Sheet Metal & Mechanical/Coen Co./  
 Darco Company of California/Pearl's Auto Supply, Inc.  
 Lynch, Loofbourrow, Gilardi & Grummer, 50 Francisco Street, Suite 400, San Francisco, CA 94133, Attn: Robert V. Betette Fax 415/397-2800  
 On behalf of: C.D. Erickson Co., Inc./California State Automobile Association/Shamrock Materials, Inc./  
 Wright-Austin Co., Inc./Masonite Corp./A.P. Green Services, Inc./American Biltrite, Inc./Swinerton & Walberg/  
 Van Bokkelen Cole Co./J.C. Penney Co., Inc. Fax 415/397-0937  
 Mackenroth Ryan Jacobson Fong, 1610 Arden Way, Suite 250, Sacramento 95815, 916/924-1912  
 Mailing: P.O. Box 255800, Sacramento, CA 95865, Attn: James R. Wright Fax 916/923-3872  
 On behalf of: Deere & Company  
 Marron, Reid & Sheehy, 601 California Street, Suite 1200, San Francisco, CA 94108, Attn: Michael Marron Fax 415/434-0800  
 On behalf of: Georgia-Pacific/Colonial Sugar & Refining, Ltd. Fax 415/986-1374  
 McCutchen, Doyle, Brown & Enersen, Three Embarcadero Center, San Francisco, CA 94111, Attn: Patricia Thrash Fax 415/393-2000  
 On behalf of: Shapell Industries, Inc./U.S. Steel/C&H Sugar Co./James River II, Inc./Atlantic Richfield/  
 American President Lines/McKesson Corp./Catholic Healthcare West Fax 415/393-2286  
 McCutchen, Doyle, Brown & Enersen, 1331 N. California Blvd., 5th Fl., Walnut Creek, CA 94596, Mailing: P.O. Box V, Walnut Creek, CA 94596, Attn: Susan A. Ogdie Fax 510/975-5331  
 On behalf of: Exxon Corp./Texaco, Inc./Coastal West Ventures/Domtar Gypsum America, Inc./  
 Bombardier, Inc./Auburn Technology, Inc. Fax 510/975-5390  
 McGlynn, McLorg & Ritchie, 177 Steuart St., Suite 200, San Francisco, CA 94105 Fax 415/543-9000  
 Attn: Craig M. Stainbrook Fax 415/543-8300  
 On behalf of: Ross General Hospital/The Clorox Co. Fax 510/465-7100  
 McInerney & Dillon, One Kaiser Plaza, 18th Floor, Oakland, CA 94612 Fax 510/465-8556  
 Attn: Carol K. Watson  
 On behalf of: University Mechanical & Engineering Contractors Fax 510/835-3400  
 McLemore, Collins & Toschi, 200 Webster Street, Suite 350, Oakland, CA 94607 Fax 510/835-7800  
 Attn: Gregory M. Doyle  
 On behalf of: Northwestern Equipment & Supply Co., Inc. Fax 510/939-5330  
 McNamara, Houston, Dodge, McClure & Ney, 1211 Newell, Suite 202, Walnut Creek, CA 94596, Mailing: P.O. Box 5288, Walnut Creek, CA 94596, Attn: Thomas E. Pfalzer Fax 510/939-0203  
 On behalf of: St. Joseph's Hospital/Congoleum/Dap, Inc./Pliibrico Sales & Service, Inc./Sutter Memorial  
 Hospital/Sutter General Hospital/FMC Corp./Dameron Hospital/American Terrazzo Co. Fax 510/939-5330  
 McNamara, Houston, Dodge, McClure & Ney, 1211 Newell, Suite 202, Walnut Creek, CA 94596, Mailing: P.O. Box 5288, Walnut Creek, CA 94596, Attn: Douglas C. McClure Fax 510/939-0203  
 On behalf of: Uniroyal, Inc.  
 Mendes & Mount, 725 South Figueroa Street, 19th Floor, Los Angeles, CA 90017 Fax 213/955-7700  
 Attn: Suzanne N. McNulty/Richard Nelson Fax 213/955-7725  
 On behalf of: Lockheed Corp./BP Chemicals (HITCO)/Curtis-Wright Corp. Fax 408/292-1765  
 Miller, Morton, Caillat & Nevis, 50 W. San Fernando St., Suite 1300, San Jose, CA 95113, Attn: Pamela J. Silberstein Fax 408/292-4484  
 On behalf of: B.T. Mancini Co., Inc./Brookman Co. Fax 415/391-6182  
 Misciagna & Colombatto, 27 Maiden Lane, 4th Floor, San Francisco, CA 94108 Fax 415/391-2904  
 Attn: P. Richard Colombatto  
 On behalf of: Metalclad Insulation Co.

|                                                                                                                                                                                                               |                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Mitchell, Silberberg & Knupp, 11377 West Olympic Boulevard, Los Angeles,<br>CA 90064-1683, Attn: Hayward J. Kaiser                                                                                            | 310/312-2000<br>Fax: 310/312-3100 |
| On behalf of: Shapco, Inc.                                                                                                                                                                                    |                                   |
| Moore & Associates, One Embarcadero Center, Suite 1200, San Francisco, CA 94111                                                                                                                               | 415/394-7004                      |
| Attn: Robert Moore                                                                                                                                                                                            | Fax: 415/981-1592                 |
| On behalf of: Claremont Hotel Corporation                                                                                                                                                                     |                                   |
| Morgenstein & Jubelirer, One Market Plaza, Spear Street Tower, 32nd Floor,<br>San Francisco, CA 94105, Attn: Charles LaGrave                                                                                  | 415/896-0666<br>Fax: 415/896-5592 |
| On behalf of: Owens-Illinois/Crosby Steam & Valve Co./Cathedral Hill Hotel, Inc./San Francisco Ladies'<br>Protection & Relief Society/Libbey-Owens-Ford/Pilkington Aerospace/Sammons/Dixon Boiler Works, Inc. |                                   |
| Morton & Lacy, Three Embarcadero Center, Suite 2280, San Francisco, CA 94111                                                                                                                                  | 415/296-9000                      |
| Attn: Alan E. Lacy                                                                                                                                                                                            | Fax: 415/398-3205                 |
| On behalf of: E.H. O'Neill Co., Inc./J.E. Steigerwald                                                                                                                                                         |                                   |
| Munger, Tolles & Olson, 33 New Montgomery Tower, 19th Floor, San Francisco,<br>CA 94105-9781, Attn: M. Elizabeth Deane                                                                                        | 415/512-4000<br>Fax: 415/512-4077 |
| On behalf of: Tennessee Gas Pipeline Company                                                                                                                                                                  |                                   |
| Nicol & Isaac, 4002 22nd Street, San Francisco, CA 94114, Attn: Lisa Nicol                                                                                                                                    | 415/821-4497                      |
| On behalf of: California Safety & Supply Co.                                                                                                                                                                  | Fax: 415/821-0791                 |
| O'Brien & Hammond, 220 Sansome St., 7th Floor, San Francisco, CA 94104                                                                                                                                        | 415/362-2040                      |
| Attn: James D. Hammond                                                                                                                                                                                        | Fax: 415/362-1050                 |
| On behalf of: LaSalle Deitch Co., Inc./Universal Foods Corp./Nabisco Brands/B.F. Goodrich                                                                                                                     |                                   |
| O'Connor, Cohn, Dillon & Barr, 101 Howard St., 5th Floor, San Francisco, CA 94105                                                                                                                             | 415/281-8888                      |
| Attn: Mark Oium                                                                                                                                                                                               | Fax: 415/281-8890                 |
| On behalf of: Federal-Mogul Corp./Vallen Safety Supply Co./AlliedSignal (Allied Chemical)/Vapor Corp./<br>Walgreen Co.                                                                                        |                                   |
| Orrick, Herrington & Sutcliffe, 400 Sansome Street, San Francisco, CA 94111                                                                                                                                   | 415/392-1122                      |
| Attn: James R. Madison                                                                                                                                                                                        | Fax: 415/773-5759                 |
| On behalf of: Grove Valve & Regulator Co.                                                                                                                                                                     |                                   |
| Otis & Hogan, One Maritime Plaza, Suite 1600, San Francisco, CA 94111-3506                                                                                                                                    | 415/362-4442                      |
| Attn: J. Morrow Otis                                                                                                                                                                                          | Fax: 415/362-7332                 |
| On behalf of: WTI Rust Holdings, Inc./Rust Industrial Services, Inc./Ralph M. Parsons Co.                                                                                                                     |                                   |
| Pace Drywall, Legal Department, P.O. Box 573, Concord, CA 94522                                                                                                                                               | 510/602-0900                      |
|                                                                                                                                                                                                               | Fax: 510/602-0905                 |
| Pacific Bell Legal Dept., 140 New Montgomery Street, Suite 1015, San Francisco,<br>CA 94105, Attn: Gerard J. Donnellan                                                                                        | 415/542-2880                      |
| Paetzold, White & Brodsky, 101 California St., Suite 1875, San Francisco, CA 94104                                                                                                                            | 415/882-4458                      |
| Attn: Cheryl Brodsky                                                                                                                                                                                          | 415/249-0966                      |
| On behalf of: Chiquita Brands/American President Lines/E.J. Bartells Co./Phelps Dodge Industries/<br>Todd Shipyards                                                                                           | Fax: 415/249-0964                 |
| Pave, McCord, Jacobs & Berkes, 15303 Ventura Boulevard, Suite 1400,<br>Sherman Oaks, CA 91403, Attn: Mark W. Lau                                                                                              | 818/783-8820<br>Fax: 818/783-0959 |
| On behalf of: California Portland Cement Co./CalMat Co./Industrial Asphalt                                                                                                                                    |                                   |
| Perkins Coie, 1999 Avenue of the Stars, 9th Floor, Los Angeles, CA 90067-6109                                                                                                                                 | 310/788-9900                      |
| Attn: Sibyl D. Marshall                                                                                                                                                                                       | Fax: 310/788-3399                 |
| On behalf of: Custodis-Cottrell, Inc.                                                                                                                                                                         |                                   |
| Pillsbury, Madison & Sutro, 225 Bush St., San Francisco 94104; Mailing: P.O. Box 7880,<br>San Francisco, CA 94120, Attn: Marte Bassi                                                                          | 415/983-1000<br>Fax: 415/38-2096  |
| On behalf of: Bethlehem Steel Corp.                                                                                                                                                                           |                                   |
| Pillsbury, Madison & Sutro, 400 Capitol Mall, Suite 1700, Sacramento, CA 95814                                                                                                                                | 916/441-0868                      |
| Attn: Benjamin Webster/Frank Sieglitz                                                                                                                                                                         | Fax: 916/441-3583                 |
| On behalf of: Aerojet General Corp.                                                                                                                                                                           |                                   |
| Pittsburgh Corning Corporation, 800 Presque Isle Dr., Pittsburgh, PA 15239                                                                                                                                    | 412/733-3838                      |
| Attn: Gerald A. DeSimone                                                                                                                                                                                      | Fax: 412/733-5849                 |
| Pond, Shjeflo & Wohl, 1730 S. El Camino Real, 6th Floor, San Mateo, CA 94402                                                                                                                                  | 415/341-2901                      |
| Attn: Michael A. Fox                                                                                                                                                                                          | Fax: 415/341-2258                 |
| On behalf of: Thorpe Insulation Co.                                                                                                                                                                           |                                   |

Popelka, Allard, McCowan & Bondonno, 160 W. Santa Clara St., 12th Floor, 408/298-6611  
 San Jose, CA 95113-1721, Attn: John P. Cardosi Fax 408/275-0814  
 On behalf of: Giampolini & Company  
 Porter, Scott, Weiberg & Delehant, 350 University Avenue, Suite 200, Sacramento, 916/929-1481  
 CA 95865, Attn: Elisa Ungerman Fax 916/927-3706  
 On behalf of: Economy Lumber Co./Minton's Lumber & Supply Co./ANCO Insulations, Inc.  
 Porter, Scott, Weiberg & Delehant, 350 University Avenue, Suite 200, Sacramento, 916/929-1481  
 CA 95865, Attn: Craig A. Caldwell Fax 916/927-3706  
 On behalf of: Van Housen Auto Parts  
 Pray, Price, Williams & Russell, 555 East Ocean Boulevard, Suite 810, 310/436-1231  
 Long Beach, CA 90802-5055, Attn: Bruce Bothwell Fax 310/435-6384  
 On behalf of: Bay Cities Crane & Rigging, Inc.  
 Preuss, Walker & Shanagher, 595 Market St., 16th Floor, San Francisco, CA 94105 415/978-2600  
 Attn: Thomas W. Pulliam, Jr. Fax 415/978-2613  
 On behalf of: American Honda Motor Co., Inc./Marsh & McLennan, Inc./Lac d'Amiante du Quebec, Ltee/  
 Hollingsworth & Vose/Monsanto Co./Hobart Corp./Federated Metals-ASARCO  
 Prindle, Decker & Amaro, 369 Pine Street, Suite 800, San Francisco, CA 94104 415/788-8354  
 Attn: Mary Kirk Hillyard Fax 415/788-3625  
 On behalf of: Auburn Manufacturing Co./A.B. Boyd Co./Argo International Corp./Bode Gravel Co./  
 Wheeler Protective Apparel/J.T. Thorpe, Inc./J.T. Thorpe & Son, Inc./Hajoca Corp./M.H. Detrick Co./  
 Frederick Meiswinkel, Inc./D. Cummins Corp./Gerber Products, Inc./Syd Carpenter Marine Contractors/  
 Pacific Bell/Lockheed Corp./Tri Valley Growers/Playboy Enterprises/Mervyn's/Gillon Lumber Co./Feuer Corp./  
 Gangi Brothers-Packing Co./Henry Vogt Machine Co./Geyser Peak Winery/Familian Corp./Southern Talc/  
 American Housing Guild/Bird Corp./Boise Cascade/Mayta & Jensen/Powerline Oil Co./Eternit, Inc./  
 American Biltrite, Inc./Dean's Material, Inc. d/b/a Construction Material Suppliers, Inc./Hayward Lumber Co./  
 Kaiser Steel Resources/Champion Industrial Contractors/Singer Safety Co./Powerline Oil Co./  
 Robertshaw Controls Co./Seal Methods, Inc./Pillar Industries, Inc./Del Webb Corporation  
 Prusik, Selby, Daley & Swan, 303 W. Madison St., Suite 1600, Chicago, IL 60606 312/553-4700  
 On behalf of: Wheeler Protective Apparel Fax 312/553-0332  
 Raifman & Edwards, 131 Steuart Street, Fourth Floor, San Francisco, CA 94105-1230 415/284-6700  
 Attn: Jon Logan Edwards Fax 415/284-6701  
 On behalf of: American Crane & Equipment Corporation  
 Rankin, Sproat & Pollack, 1800 Harrison St., Suite 1616, Oakland, 94612, Mailing: 510/465-3922  
 P.O. Box 28765, Oakland, CA 94604, Attn: Thomas A. Trapani Fax 510/465-3006  
 On behalf of: Peninsula Hospital/California Pacific Medical Center/Ralph K. Davies Medical Center/  
 St. Mary's Hospital/St. Luke's Hospital/John Muir Hospital/Summit Medical Center/Alta Bates Hospital/  
 Mt. Zion Hospital/St. Francis Hospital/Sutter Health Pacific/Sutter Memorial Hospital/Sutter General Hospital/  
 Reisinger & McAuley, 1050 Northgate Dr., Suite One, San Rafael, CA 94903 415/499-1033  
 Attn: Jerry L. Williams Fax 415/499-0329  
 On behalf of: San Pablo Plumbing Co./Noble Auto Parts/J.G. MacPhee Co.  
 Rice, Fowler, Booth & Banning, 275 Battery Street, 27th Floor, San Francisco, 415/399-9191  
 CA 94111, Attn: M. Felicia Gay Fax 415/399-9192  
 On behalf of: Mobil Oil Corporation/Dorr-Oliver, Inc./Matthew G. Norton Co.  
 Rivkin, Radler & Kremer, Post Office Box 14609, Santa Rosa, CA 95402 707/576-8033  
 Attn: Christopher A. Crevasse Fax 707/576-7955  
 On behalf of: Kimberly-Clark Corp./D.A.R. Industrial Products, Inc.  
 Ropers, Majeski, Kohn & Bentley, 670 Howard Street, San Francisco, CA 94105 415/543-4800  
 Attn: John Curran Ladd Fax 415/512-1574  
 On behalf of: The Cannery/Cyprus Amax Minerals Co./Calfox, Inc./General American Transportation Corp./  
 Porter Warner Industries, Inc./E.V. Roberts & Associates, Inc./The Bank of California/Grinnell Corp./  
 Embarcadero Center Associates/Westinghouse Electric Corp./Rome Cable Corp./Dinwiddie Construction/  
 Genuine Parts Co./Glas-Col Apparatus Co./Oakhill Improvement Co./Oahu Sugar Co./Lucky Stores/Prudential  
 Insurance Company of America/California Safety & Supply  
 Mark H. Rosenthal, Esq., 300 California St., 30th Floor, San Francisco, CA 94111 415/986-1364  
 On behalf of: Crown Cork & Seal 425 California St., Ste 2506 Fax 415/362-1915  
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| Rust, Armenis, Schwartz, Lamb & Bills, Post Office Box 41958, Sacramento,<br>CA 95841, Attn: Duane Skelton                                                                                                                                                                                                                                                                                                                                                                     | 816/972-8300<br>Fax: 916/972-7878 |
| On behalf of: Melrose Lumber Supply/Tynan Lumber Co., Inc./Minton's Lumber & Supply<br>S&P Company, 100 Shoreline Highway, Building B, Suite 315, Mill Valley, CA 94941                                                                                                                                                                                                                                                                                                        | 415/332-0550<br>Fax: 415/332-9023 |
| Attn: William M. Bittling                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                   |
| On behalf of: General Brewing Co./Lucky Lager Brewing Co.<br>St. Clair, McFetridge & Griffin, One Montgomery St., Suite 1400, San Francisco,<br>CA 94104, Attn: Anthony Griffin                                                                                                                                                                                                                                                                                                | 415/421-2462<br>Fax: 415/421-2462 |
| On behalf of: Bank of America NT & SA<br>St. Peter & Cooper, Three Embarcadero Center, Suite 2900, San Francisco, CA 94111                                                                                                                                                                                                                                                                                                                                                     | 415/955-0700<br>Fax: 415/955-0711 |
| Attn: Michael St. Peter                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                   |
| On behalf of: ACandS, Inc.<br>Sack and Associates, 1433 Webster Street, Suite 200, Oakland, CA 94612                                                                                                                                                                                                                                                                                                                                                                           | 510/444-6453<br>Fax: 510/444-3753 |
| Attn: William S. Miller                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                   |
| On behalf of: Ralph M. Parsons Co./Chicago Bridge & Iron Co.<br>Sainick & Cote', 190 Newport Center Drive, Suite 100, Newport Beach, CA 92660                                                                                                                                                                                                                                                                                                                                  | 714/644-9400<br>Fax: 714/644-1142 |
| Attn: Frederick B. Sainick                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                   |
| On behalf of: San Joaquin Refining<br>Samaha, Grogin, Stulberg, 35 North Lake Avenue, Suite 810, Pasadena, CA<br>91101-1856, Attn: Thomas J. Samaha                                                                                                                                                                                                                                                                                                                            | 818/584-1388<br>Fax: 818/584-6664 |
| On behalf of: Hood Corporation<br>Sarrail, Lynch & Hall, 44 Montgomery Street, 34th Floor, San Francisco, CA 94104                                                                                                                                                                                                                                                                                                                                                             | 415/398-2404<br>Fax: 415/391-9076 |
| Attn: Brian D. Harrison                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                   |
| On behalf of: Safeway, Inc.<br>Scadden, Hamilton & Ryan, 580 California St., Suite 1400, San Francisco, CA 94104                                                                                                                                                                                                                                                                                                                                                               | 415/362-5116<br>Fax: 415/364-4214 |
| Attn: Greg Mitchell                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                   |
| On behalf of: Supro, Inc./Trans-European Motors/Elliott Co./Excelsior, Inc./Bank of California/<br>Dover Resources/EG&G Sealol, Inc./Alfred Conhagen, Inc./Foster Wheeler Corp./Riley Stoker Corp./<br>Liberty Mutual Insurance Co./Valley Nitrogen Producers/Greene Tweed Co./Southern California Jobbers/<br>National Auto Parts/H.J. Heinz Corp./Nestle Food Co./Durametallic Corp./Colgate-Palmolive/<br>United Technologies Corp./Robertson-Coco Corp./Clayton Industries |                                   |
| Schaffer & Lax, 5757 Wilshire Blvd., Suite 600, Los Angeles, CA 90036                                                                                                                                                                                                                                                                                                                                                                                                          | 213/934-4300<br>Fax: 213/931-5680 |
| Attn: Kevin J. McNaughton                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                   |
| On behalf of: U.S. Mineral Products Co.<br>Schofield & Schiller, 100 Pringle Ave., Suite 510, Walnut Creek, CA 94596                                                                                                                                                                                                                                                                                                                                                           | 510/934-3600<br>510-934-2257      |
| Attn: Carol Meyer                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                   |
| On behalf of: Kelly-Moore Paint Co./Regents of the University of California/Airport Auto Parts, Inc./Farmers<br>Underwriters Association/Peck Jones Construction Co./C.L. Peck Contractor<br>Schuler & Kessel, 3435 Wilshire Boulevard, Suite 1970, Los Angeles, CA 90010-1901                                                                                                                                                                                                 | 213/365-0924<br>Fax: 213/365-0938 |
| Attn: Elizabeth M. Kessel                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                   |
| On behalf of: Aluma Systems<br>Schwabe, Williamson & Wyatt, 1211 SW Fifth Ave., Suites 1600-1950, Portland,<br>OR 97204-3795, Attn: Margaret Hoffman                                                                                                                                                                                                                                                                                                                           | 503/222-9981<br>Fax: 501/796-2900 |
| On behalf of: Oregon Steel Mills<br>Sedgwick, Detert, Moran & Arnold, One Embarcadero Center, 16th Floor,<br>San Francisco, CA 94111, Attn: Holly A. Harris                                                                                                                                                                                                                                                                                                                    | 415/781-7900<br>Fax: 415/781-2635 |
| On behalf of: Scandura, Inc./Hennessy Industries, Inc./Ingalls Shipbuilding/Standard Oil of California/<br>Shell Oil Co./Soco-Lynch Corp./General Electric Co./Phillips Petroleum Co./Pacific Gas & Electric Co./<br>Chevron, U.S.A., Inc./Glass Containers Corp./Consolidated Insulation/Hawaiian Electric/Sierra Pacific/<br>CPC International/Gulf Oil                                                                                                                      |                                   |
| Sedgwick, Detert, Moran & Arnold, 801 South Figueroa Street, 18th Floor, Los Angeles,<br>CA 90017-5556, Attn: John R. Burge                                                                                                                                                                                                                                                                                                                                                    | 213/426-6900<br>Fax: 213/426-6921 |
| On behalf of: Caterpillar, Inc.<br>Seyfarth, Shaw, Fairweather & Geraldson, 101 California Street, Suite 2900,<br>San Francisco, CA 94111, Attn: Peter E. Romo                                                                                                                                                                                                                                                                                                                 | 415/397-2823<br>Fax: 415/397-8549 |
| On behalf of: Marriott Corp./Newport News Shipbuilding & Dry Dock Co./Bay Decking Co., Inc.                                                                                                                                                                                                                                                                                                                                                                                    |                                   |

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| Daniel M. Shapiro, Attorney at Law, 333 South Grand Ave., Suite 2850, Los Angeles, CA 90071                                                            | 213/625-7400<br>Fax: 213/625-0303 |
| On behalf of: Calmar Distributing Co., Inc.                                                                                                            |                                   |
| Shea & Gardner, 1800 Massachusetts Avenue N.W., Washington, D.C. 20036                                                                                 | 202/828-2000                      |
| Attn: Laura Quinn                                                                                                                                      | Fax: 202/828-2195                 |
| On behalf of: Rockwell International                                                                                                                   |                                   |
| Sheppard, Mullin, Richter & Hampton, Four Embarcadero Center, 17th Floor, San Francisco, CA 94111, Attn: Gary J. Nevolo                                | 415/434-4914<br>Fax: 415/434-3947 |
| On behalf of: American Optical Co.                                                                                                                     |                                   |
| Sheppard, Mullin, Richter & Hampton, Four Embarcadero Center, 17th Floor, San Francisco, CA 94111, Attn: John F. Runkel, Jr.                           | 415/434-4914<br>Fax: 415/434-3947 |
| On behalf of: American National Can Co.                                                                                                                |                                   |
| Sidley & Austin, 555 West Fifth Street, Los Angeles, CA 90013-1010                                                                                     | 213/896-6000                      |
| Attn: Alan Au                                                                                                                                          | Fax: 213/896-6600                 |
| On behalf of: Midwest Power Systems                                                                                                                    |                                   |
| Sinclair & Hill, Post Office Box 992710, Redding, CA 96099-2710                                                                                        | 916/226-9700                      |
| Attn: Craig A. Sinclair (100 e. Cypress Ave., Suite 200)                                                                                               | Fax: 916/226-9481                 |
| On behalf of: Mercy Medical Center/Mercy Hospital of Redding                                                                                           |                                   |
| Skeel, Henke, Evenson & Roberts, 900 Fourth Avenue, Suite 3801, Seattle, WA 98164, Attn: Eric Richter                                                  | 206/623-1031<br>Fax: 206/628-2033 |
| On behalf of: Olympic Steamship Co.                                                                                                                    |                                   |
| Sorem & Pastore, 2565 Camino del Rio South, Suite 101, San Diego, CA 92108                                                                             | 619/574-1545                      |
| Attn: Joseph A. Pastore                                                                                                                                | Fax: 619/574-1200                 |
| On behalf of: Fryer-Knowles, Inc.                                                                                                                      |                                   |
| Southern Pacific Transportation Co. Law Department, 10860 Gold Center Dr., Suite 410, Rancho Cordova, CA 95670, Attn: Michael L. Johnson               | 916/789-5824<br>Fax: 916/789-5827 |
| Stark, Wells, Rahl, Schwartz & Schieffer, 1999 Harrison Street, Suite 1300, Oakland, CA 94612, Attn: May Lee Tong                                      | 510/834-2200<br>Fax: 510/763-5121 |
| On behalf of: Cassiar Mining Corp.                                                                                                                     |                                   |
| Steele & Sales, P.C., 700 5th Avenue, Suite 5511, Seattle, WA 98104                                                                                    | 206/682-2202                      |
| Attn: Katherine M. Steele                                                                                                                              | Fax: 206/682-1224                 |
| On behalf of: E.J. Bartells Co.                                                                                                                        |                                   |
| Steefel, Levitt & Weiss, One Embarcadero Center, Suite 2900, San Francisco, CA 94111, Attn: Barry W. Lee                                               | 415/788-0900<br>Fax: 415/788-2019 |
| On behalf of: Cal-Steam/Westbume Supply, Inc./Moran Supply/Plumbers Supply                                                                             |                                   |
| Sterling & Clack, 101 Howard Street, Suite 400, San Francisco, CA 94105                                                                                | 415/543-5300<br>Fax: 415/543-3335 |
| Attn: Rex M. Clack                                                                                                                                     |                                   |
| On behalf of: Olympic Steamship Co./Pope & Talbot, Inc.                                                                                                |                                   |
| Stevens, Drummond & Gifford, 1910 Olympic Boulevard, Suite 250, Walnut Creek, CA 94596, Attn: David A. Gifford                                         | 510/944-5550<br>Fax: 510/256-9669 |
| On behalf of: North American Refractories Co./Aetna Rubber & Supply/Asbestos Corporation, Ltd./                                                        |                                   |
| Wagner Electric Corp./Bell Asbestos/Azrock Industries/Cooper Industries, Inc.                                                                          |                                   |
| Francis J. Stillman, Attorney at Law, 1601 Bayshore Highway, Suite 301, Burlingame, CA 94010                                                           | 415/692-7492<br>Fax: 415/692-9144 |
| On behalf of: Montgomery, Ward & Co.                                                                                                                   |                                   |
| Stumbos & Mason, 2151 River Plaza Dr., Suite 100, Sacramento, CA 95833                                                                                 | 916/567-8211                      |
| Mailing: P.O. Box 868, Sacramento, CA 95804, Attn: Brad Thomas                                                                                         | Fax: 916/567-8212                 |
| On behalf of: Fruehauf Corp./Kelsey-Hayes Co.                                                                                                          |                                   |
| Sturgeon, Keller, Phillips & Gee, 388 Market Street, Suite 670, San Francisco, CA 94111, Attn: Brock D. Phillips                                       | 415/955-0800<br>Fax: 415/955-0810 |
| On behalf of: Atchison, Topeka & Santa Fe Railway Co./Burlington Northern Railroad Co.                                                                 |                                   |
| Tarkington, O'Connor & O'Neill, One Market Plaza, Spear Street Tower, 41st Floor, San Francisco, CA 94105, Attn: Deborah Lindblom                      | 415/777-5501<br>Fax: 415/546-4962 |
| On behalf of: Western Brake/Friction, Inc./Imperial Holly Corp. (Holly Sugar)                                                                          |                                   |
| Thayer, Harvey, Hodder & Gregerson, 1100 Fourteenth Street, Suite F, Modesto, CA 95353 (Mail: P.O. Box 3465, Modesto, CA 95353), Attn: Janet B. Hodder | 209/523-3300<br>Fax: 209/523-3399 |
| On behalf of: Roseville Telephone Company                                                                                                              |                                   |

Thelen, Marrin, Johnson & Bridges, Two Embarcadero Center, San Francisco, CA 94111, Attn: Jennifer A. Kuenster 415/392-6320  
 Fax: 415/421-1068  
 On behalf of: Kaiser Aerotech/Kaiser Aluminum & Chemical Corp./Bechtel Corp./Sequoia Ventures, Inc./Robert E. McKee, Inc./Kaiser Center, Inc./Mack Trucks, Inc./Fremont Group, Inc.  
 Thelen, Marrin, Johnson & Bridges, 333 South Grand Avenue, 34th Floor, Los Angeles, CA 90071, Attn: Paul Lax 213/621-9800  
 Fax: 213/623-4742  
 On behalf of: M.W. Kellogg/Dresser Industries, Inc.  
 Thompson & Heller, 400 Capitol Mall, 26th Floor, Sacramento, CA 95814 916/498-7300  
 Attn: Phillip Bonotto Fax: 916/498-7350  
 On behalf of: Vellumoid, Inc./Hopeman Brothers/Great Lakes Carbon Corp./Ticor Title Insurance Co./Dravo Corporation/Federated Department Stores  
 Tilly & Graves, 500 Washington St., Suite 800, San Francisco, CA 94111 415/955-8925  
 Attn: Patrick O'Keefe Fax: 415/955-8933  
 On behalf of: Owens-Corning Fiberglas Corp.  
 Time Oil Company, P.O. Box 2447, Seattle, WA 98124 206/285-2400  
 Attn: Ron Kokesh Fax: 206/286-4488  
 TIMEC Company, 155 Corporate Place, Vallejo, CA 94590, Attn: Brent A. Babow 707/642-2222  
 (The Industrial Maintenance Engineering Co.) Fax: 707/648-2719  
 Titchell, Maltzman, Mark, Bass, Ohleyer & Mishel, 650 California St., 29th Floor, San Francisco, CA 94108, Attn: Philip B. Bass/Richard C. Insalaco 415/392-5600  
 Fax: 415/981-5027  
 On behalf of: American Brass & Iron Foundry  
 Vogl & Meredith, 456 Montgomery St., 20th Floor, San Francisco, CA 94104 415/398-0200  
 Attn: Jean Yeh Fax: 415/398-2820  
 On behalf of: American Asbestos Co./Pacific Pipe/ San Mateo Lumber Co./Avocet Enterprises, Inc./Pacific Supply Co./W.E. Mushet Co.  
 Walsworth, Franklin, Bevins & McCall, 580 California Street, Suite 1335, San Francisco, CA 94104, Attn: Robert M. Channel 415/781-7072  
 Fax: 415/391-6258  
 On behalf of: Bishop Wholesale, Inc./Friction Materials, Inc./California Builders Hardware/Dowman Products/Pacific Holiday Towers, Ltd./Hamilton Materials/Selby, Battersby & Co./Daniel Smith Plastering, Inc./Western Water Works/Southern California Edison Co./Thomas Dee Engineering Co./Quintec Industries/Rite Engineering Manufacturing/Stanley Foib, Inc./K.R. Anderson/American Chemet Corp./Supreme Auto Parts/Saberhagen Holdings, Inc. (The Brower Co.)/Carter Co./San Diego Gas & Electric/Bondex International/Custom Building Products/Martin Madsen Co./Baltimore Ennis Land Co./MacAulay Foundry, Inc./W.W. Henry Co.  
 Walsworth, Franklin, Bevins & McCall, 1 City Boulevard West, Suite 308, Orange, CA 92668-3604, Attn: Michael T. McCall 714/634-2522  
 Fax: 714/634-0686  
 On behalf of: Gibson-Homans  
 White, Gorman & Baker, One Market Plaza, Spear Street Tower, 8th Floor, San Francisco, CA 94105, Attn: Margaret T. Gorman 415/541-3720  
 Fax: 415/541-3738  
 On behalf of: 870 Market Street Associates/Anchor Brewing Co./Diana Fruit Co./American Energy Products/Hales & Symons/Haskell Corp./Big B Lumberteria/Lindsay International, Inc./Structural Coating, Inc./Elliott Glove Co./George P. Reintjes Co., Inc.  
 Williams, Romanski, Polverari & Skelton, 152 North Third St., Suite 600, San Jose, CA 95112, Attn: Alan J. Zapala 408/275-8262  
 Fax: 408/294-6707  
 On behalf of: Epoxylite Corp./Bay Rubber Co./Yrueta Drywall & Painting/Basco Drywall & Painting Co./Allied Packing & Supply  
 Wilson, Elser, Moskowitz, Edelman & Dicker, 650 California Street, 14th Floor, San Francisco, CA 94108, Attn: Colleen A. Peck 415/433-0990  
 Fax: 415/434-1370  
 On behalf of: Kubota Corp./Durabla Mfg. Co., Inc./Asbestos Products Mfg. Corp./H&A Construction Corp./Asbestospray  
 Law Offices of Robert K. Wright, 301 N. Lake Ave., Suite 700, Pasadena, CA 91101 818/796-2664  
 On behalf of: The Budd Company Fax: 818/796-1601  
 Wright, Robinson, McCammon, Osthimer & Tatum, 44 Montgomery St., 18th Floor, San Francisco, CA 94104, Attn: Mark P. Krinsky 415/391-7111  
 Fax: 415/391-8766  
 On behalf of: San Francisco Gravel Co./J.S. Guerin Co.  
 Wright, Robinson, McCammon, Osthimer & Tatum, 44 Montgomery St., 18th Floor, San Francisco, CA 94104, Attn: Myles E. Fladager 415/391-7111  
 Fax: 415/391-8766  
 On behalf of: Freightliner Corp.