EXHIBIT 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
and
SOUTHERN DISTRICT OF NEW YORK

In re: JOINT EASTERN DISTRICT and SOUTHERN DISTRICT ASBESTOS LITIGATION	NYAL DEFENDANT NATIONAL GYPSUM'S RESPONSE TO PLAINTIFFS' FIRST STANDARD SET OF LIABILITY INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
This Document Applies To All Cases	

National Gypsum Company ("National Gypsum") responds to Plaintiffs' First Standard Set of Liability Interrogatories and Request for Production of Documents as follows:

GENERAL OBJECTIONS

Defendant National Gypsum objects to any interrogatory, request or instruction that purports to impose upon defendant any obligation not expressly set forth in the Federal Rules of Civil Procedure.

Defendant National Gypsum also objects to these interrogatories to the extent that they seek privileged or work product information developed in anticipation of litigation or in preparation for trial.

Defendant National Gypsum objects generally to these interrogatories to the extent that they purport to require

ANSWER: National Gypsum objects to this interrogatory on the grounds that it is overbroad, vague, confusing and unduly burdensome and requests information not relevant to the subject matter of this action or reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, National Gypsum states that, in general, responsibilities were not assigned on the basis of whether or not products contained asbestos. Without waiving these objections, see Attachments 3, 4 and 5. For further information, see Attachment 7.

9. Have you or any of your predecessors or subsidiaries ever mined, processed, refined, sold or distributed asbestos or asbestos containing products. If so, for each such product, complete an "Asbestos Product Information Sheet, Attachment #1.

ANSWER: See Attachments A through UU ("Product Attachments"). Further information concerning National Gypsum's products would be included in its records, which are available for inspection in accordance with Attachment 7.

10. If your company ever manufactured or sold any of the following types of asbestos products, please identify each product and describe how it is cut, shaped, mixed and applied on the job:

a. Asbestos cement mixes;

b. asbestos pipe covering;

STATE OF NORTH CAROLINA :
ss.
COUNTY OF MECKLENBURG :

ROBERT E. OBERKIRCHER, being duly sworn, deposes and says that he is an Assistant Controller of Gold Bond Building Products, a Division of National Gypsum Company; that he is authorized to make this affidavit; that he has read the foregoing answers to interrogatories and knows the contents thereof; and that they are true to the best of his knowledge, information and belief.

Robert E. Oberkircher
Assistant Controller
Gold Bond Building Products Division
National Gypsum Company

Sworn to and subscribed
before me this 30 day
of December 1987.

Jean M. Meredith
Notary Public

My Commission Expires:
My Commission Expires July 12, 1989

EXHIBIT 3

COMMONWEALTH OF MASSACHUSETTS

EASTERN COUNTIES, ss.	:	SUPERIOR COURT
	:	
IN RE: MASSACHUSETTS STATE	:	MASSACHUSETTS
COURT ASBESTOS	:	ASBESTOS CASES
LITIGATION	:	CONSOLIDATED DOCKET

RESPONSES OF ASBESTOS CLAIMS MANAGEMENT CORPORATION, FORMERLY KNOWN AS NATIONAL GYPSUM COMPANY, TO PLAINTIFFS' REVISED STANDARD INTERROGATORIES

Asbestos Claims Management Corporation, formerly known as National Gypsum Company ("ACMC" or "National Gypsum"), pursuant to the Massachusetts Rules of Civil Procedure and Pretrial Order Nos. 4, 5 and 6, hereby responds to Plaintiffs' Interrogatories as follows:

OBJECTIONS TO LIMITATIONS AND DEFINITIONS

1. Geographic Limitation: ACMC objects to this limitation on the grounds that it is overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

2. Time Limitation: ACMC objects to this limitation as overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

However, see Attachment 22. Russell Ward, former Director of Corporate Public Affairs for National Gypsum Company, 37 Timber Ridge Drive, Clover, South Carolina, has the most present knowledge about National Gypsum's development of asbestos-containing products.

The following interrogatories, M6-M13 are to be answered by MANUFACTURERS of asbestos or asbestos containing products.

INTERROGATORY NO. M6:

Has THIS DEFENDANT engaged in the MANUFACTURE of ASBESTOS-CONTAINING PRODUCT(S) comprised in whole or in part of amosite asbestos fiber, if so, please state:

a. the trade, brand name and/or generic name of each type of product;

b. the date(s) THIS DEFENDANT first MANUFACTURED each type of product;

c. the date(s) THIS DEFENDANT ceased MANUFACTURING each type of product;

d. a description of the chemical composition of each type of product, including:

i. the type(s) and/or grade(s) of RAW ASBESTOS FIBER contained in each type of product;

ii. the quantitative percentage of the type(s) of RAW ASBESTOS FIBER in each type of product;

iii. any change(s) in the quantitative percentages of the type(s) of RAW ASBESTOS FIBER in each type of product;

e. the NATURE of each type of product;

f. a description of any wording, markings and/or logo on each type of product;

g. the recommended use(s) of each type of product, including temperature limits;

h. the name(s) of the manufacturer(s), at the time of manufacture, of each type of product;

i. the date(s) each such manufacturer's product was manufactured by this defendant.

j. the name(s) and address(es) of the supplier(s) of the amosite asbestos fiber used in each type of product;

k. the IDENTITY of the person(s) most knowledgeable concerning the purchase of amosite asbestos fiber by THIS DEFENDANT.

RESPONSE: See Attachments A - UU ("Product Attachments"), which describe all asbestos-containing products manufactured or sold by National Gypsum and identify the type of asbestos fiber in each product, if known. After reasonable investigation, defendant is unable to identify any person knowledgeable about National Gypsum's purchases of amosite asbestos, except that Russell Ward, identified in the Introductory Statement, has the most knowledge

about National Gypsum's records relating to asbestos. Amosite asbestos may have been supplied by North American Asbestos Corporation.

INTERROGATORY NO. M7:

Has THIS DEFENDANT engaged in the MANUFACTURING of amosite asbestos fiber; if so state:

a. the name and location of each amosite asbestos mine which THIS DEFENDANT presently operates, has operated, or in which THIS DEFENDANT has or had an ownership interest, including the dates of such ownership, and the grade of amosite asbestos fiber mined; or the manufacturer of any such fiber manufactured by this defendant, including dates this defendant installed fiber at each such manufacturer.

b. the date(s) THIS DEFENDANT first MANUFACTURED amosite asbestos fiber;

c. the date(s) THIS DEFENDANT ceased MANUFACTURING amosite asbestos fiber;

d. the grade(s) of such amosite asbestos fiber MANUFACTURED by THIS DEFENDANT;

e. the recommended use(s) of each grade of such amosite asbestos fiber, including any temperature limits;

f. the name(s) and address(es) of the supplier(s) of amosite asbestos fiber to THIS DEFENDANT.

RESPONSE: National Gypsum did not mine or sell amosite asbestos fiber.

ATTACHMENT AA TO ANSWERS TO INTERROGATORIES

Joint Treatment Materials

Joint treatment materials were applied with a broad knife to fill in and to conceal the seams between pieces of wallboard or drywall, to conceal nailheads in gypsum wallboard or drywall, and, sometimes, to laminate wallboard or drywall to an existing wall or ceiling surface.

National Gypsum has used the following tradenames at various times on it joint treatment materials: Gold Bond Joint Cement, Gold Bond Crown Coat Cement, Gold Bond All-Purpose Joint Cement, Gold Bond All-Purpose Joint Compound, Gold Bond Tri-Treatment Joint Cement, Gold Bond Tri-Treatment Joint Compound, Gold Bond Finisher, Gold Bond Joint Compound, Wesco Joint Treatment, Gold Bond Quick-Treat Joint Compound, Gold Bond Triple T Compound, Gold Bond Sta-Smooth Compound, Gold Bond Velvet Joint Compound, Gold Bond Two-In-One Compound, Gold Bond Thermo-Weld Compound, Gold Bond Quick-Weld or Q-W Compound, Gold Bond Ready Mixed Joint Cement, Gold Bond Ready Mixed Joint Compound, Gold Bond Topping Cement, Gold Bond Topping Compound, Gold Bond Velvet Topping Compound, Gold Bond Ready Mixed Compound, Gold Bond Vinyl Topping Compound and Gold Bond "D2" Topping Compound.

National Gypsum registered its "Gold Bond" trademark. In addition, National Gypsum registered the following three trademarks for joint treatment materials: "Quik-Treat" (June 24,

1963), "Triple T" (October 29, 1965), and "Q/W" (January 22, 1973).

National Gypsum was given Patent Nos. 2,523,646 (on September 26, 1950), 3,303,147 (on February 7, 1967), 3,808,017 (on April 30, 1974), and 3,984,269 (on October 5, 1976) in connection with general improvements for joint treatment materials. National Gypsum was given Patent No. 3,907,715 (on September 23, 1975) for an asbestos-free joint compound.

Dry joint treatment materials containing asbestos were manufactured by National Gypsum from approximately 1935 until late 1975. Ready-mixed joint treatment materials containing asbestos were manufactured from the 1950's until late 1975. Sales of joint treatment materials containing asbestos may have continued into 1976. Joint treatment materials manufactured by National Gypsum after 1975 did not contain asbestos. Non-asbestos joint treatment products were developed because National Gypsum became aware of potential hazards associated with the use of asbestos-containing products in certain situations, and because government regulations applicable to users of asbestos-containing products (National Gypsum's customers) could be met most easily by development of asbestos-free formulations.

Joint treatment materials were manufactured by National Gypsum Company in the following locations: Baltimore, Maryland; Berkeley, California; Bronx, New York; Good Hope, Louisiana; Long

Beach, California; Luckey, Ohio; Matteson, Illinois; Raritan, New Jersey; Rotan, Texas; Trenton, New Jersey; Westwego, Louisiana.

The asbestos content of joint treatment products varied for different formulations. For ready mixed products, the percentage by weight of chrysotile asbestos varied between 0.9% and 10.9%. For other types of joint treatment products, the percentage by weight of chrysotile asbestos generally was between 1.1% and 23.1%, although a few formulations provided for asbestos content as high as 45.2%.

National Gypsum also purchased joint treatment material, containing asbestos, for resale from: Hatcher Lumber Company, Phoenix, Arizona (1962-1969); Ruco Company, Kansas City, Missouri (1972-1976); and Monarch Paint Company, Houston, Texas (1973-1976).

Into the 1960's, National Gypsum used grade 7RF and 7T asbestos fibers purchased primarily from Johns-Manville, Asbestos Corporation Limited, and National Asbestos Mines, Ltd., in its joint treatment materials. In approximately 1967, National Gypsum also began to use Union Carbide SG-210 fiber. Asbestos was utilized in Gold Bond joint treatment materials generally to improve workability and to provide strength and durability.

Gold Bond joint treatment materials were packaged in bags, boxes, cans, and pails.

National Gypsum began affixing asbestos "Caution" labels to its packages of dry joint treatment materials in mid-

1972 and to its containers of ready-mixed joint treatment in late 1973 or early 1974. The notice read as follows:

"CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May
Cause Serious Bodily Harm"

Beginning in late 1973 or early 1974, National Gypsum added the following dust caution labels to its packages of joint treatment materials. These dust caution labels were used together with the above asbestos caution labels.

The dust caution labels for dry joint treatment read:

"CAUTION

When mixing and/or dry sanding this product wear eye protection and a respirator which is U.S. Bureau of Mines approved for Toxic, Nuisance and Pneumoconiosis producing dusts. Wet sanding or sponging is recommended."

The dust caution label for ready-mixed joint treatment read:

"CAUTION

When dry sanding this product wear eye protection and a respirator which is U.S. Bureau of Mines approved for Toxic, Nuisance and Pneumoconiosis producing dusts. Wet sanding or sponging is recommended."

National Gypsum believes that the language of the warnings did not change after 1974, when "NIOSH" was substituted for "U.S. Bureau of Mines." Warnings were included pursuant to OSHA regulations and recommendations.

In addition to warnings supplied with its joint treatment products, National Gypsum sent a letter dated November 1, 1974, to some customers advising them of the new OSHA regulations concerning the handling of asbestos-containing materials. National Gypsum cannot now identify the recipients of this letter. In addition, beginning in the early 1970's, National Gypsum may have provided information concerning possible hazards of asbestos in response to individual requests.

STATE OF NORTH CAROLINA:
ss.
COUNTY OF MECKLENBURG:

RUSSELL F. WARD, being duly sworn, deposes and says that he is the former Director of Corporate Public Affairs of National Gypsum Company; that he is authorized to make this affidavit; that he has read the foregoing Responses to Interrogatories and knows the contents thereof; and that they are true to the best of his knowledge, information and belief.

Russell F. Ward

Sworn to and subscribed
before me this 8 day
of December 1995

Charmaine C. Hurst
Notary Public

My Commission Expires
October 30, 1998