

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

GREENVILLE COUNTY SCHOOL
DISTRICT,

Plaintiff,

-vs-

UNITED STATES GYPSUM COMPANY,
W. R. GRACE & COMPANY, and
NATIONAL GYPSUM COMPANY,

Defendants.

Civil Action No. 82-3142

AFFIDAVIT OF S. K. TORRE
RE: DOCUMENT REVIEW AND
PRODUCTION



S. K. Torrey, being first duly sworn on oath, dep
and states:

1. This Affidavit is filed pursuant to the Cour
Order dated April 25, 1984, directing that the defendants s:
file a statement dealing with the Plaintiff's Request to Pr
Documents, setting forth the "encompassment of the search,
person or persons who participated in the search, and the i
tification of all documents for which they claim privilege.

2. She is Senior Attorney - Litigation, employe
by and representing United States Gypsum Company, one of th
defendants herein and has been employed in the same or simi
capacity since March, 1979. During the period August, 1977
March, 1979, she held the position of attorney.

3. During the entire period from August, 1977 t
present, she has had primary responsibility for the managem
and coordination of all aspects of this defendant's involve
in asbestos cases, both personal injury and property damage

Ref 02. 15
7-29-84

("asbestos litigation"). Part of these responsibilities is searching for documents which were or might be relevant to "asbestos litigation." This search for documents was performed by her personally or by others under her direction and control. All documents reviewed and/or produced for the "asbestos litigation" were discovered during this time frame.

4. Said search for documents commenced in approximately 1978 and has been an on-going procedure. No attempt was made to systematically record the identity of each person consulted or each drawer or box opened. To reconstruct this process would be difficult at best and bound to result in omissions of names or places.

5. The foregoing notwithstanding, in general the following locations were searched: USG central corporate files (located at 101 South Wacker Drive and 500 Orleans Street, Chicago, Illinois), research department, product management quality department, safety department, secretarial department, personnel department, data processing, architectural services, advertising, various plants, sales and division offices, insurance department, and libraries. Persons affiliated with these departments were consulted and may have participated in the search. Literally hundreds of current and/or former employees have been consulted.

6. Plaintiff's Request for Production herein was filed on or about January 13, 1983, some five years after the search for documents was begun.

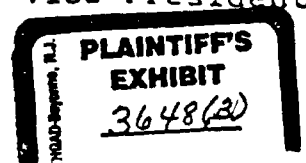


7. Obviously, not all document requests and interrogatories are identical and differing requests may cause different records to be searched.

8. Similarly, if a request for documents or interrogatory seeks information previously reviewed and gathered, documents are produced from that source of documents and if already complete, no further search is undertaken since it would be needlessly duplicative.

9. At present, no other documents have been located responsive to Plaintiff's Request to Produce dated January 1, 1983, as qualified by outstanding Objections and excluding privileged documents, if any, and as already disclosed in United States Gypsum Company's Supplemental Responses or previously produced to plaintiff's counsel without formal Supplementations other than the attached, which was located recently.

10. Other persons knowledgeable about the search for documents in whole or in part include, but are not limited to: B. L. Arras, Attorney; G. H. Smith, Attorney; E. A. Throop, Assistant; L. A. Steskal, Legal Assistant; C. J. Witting, Legal Assistant; D. L. Woodruff, (former) Legal Assistant; M. K. J. (former) Legal Assistant; E. A. Griffith, (former) Legal Assistant; J. H. Robinson, Legal Assistant, R. Galganski, (former) Secretary; J. McCullough, (former) Legal Assistant, E. O. McCarthy, (former) Attorney; J. F. Hernan, Manager, Corporate Quality Assurance; K. S. Freeman, (former) Manager, Consumer Product Safety; J. D. Cornell, Manager, Corporate Occupational Safety & Health; R. E. Clark, Records Manager; J. N. Walker, Vice President,



Research & Development, (and various others at Research);
R. L. Russell, Manager, Insurance.

FURTHER, THE AFFIANT SAYETH NOT.

Suzanne K. Torrey
SUZANNE K. TORREY

Subscribed and Sworn to
before me this 25th day
of May, 1984.

Maure O. Merrill
NOTARY PUBLIC

