

J. CARLISLE DEHAY, JR.
(1922 - 1991)

GARY D. ELLISTON
DAVID W. CROWE
MEL D. BAILEY
ERIC D. WEWERS
CHRISTOPHER P. MANNING
PAUL E. HAMILTON
KATHRYN HERMES
W. SCOTT BERRY
LAURA E. KUGLER
TODD J. SUDDLESON
MELINDA S. HUFF
BRENT M. KARREN

WRITER'S DIRECT DIAL
(214) 210-2409

DEHAY & ELLISTON, L.L.P.

ATTORNEYS AND COUNSELORS
3500 BANK OF AMERICA PLAZA
901 MAIN STREET
DALLAS, TEXAS 75202-3736
(214) 210-2400
FACSIMILE (214) 210-2500

215 ORLEANS ST.
BEAUMONT, TEXAS 77701
(409) 833-0900
FACSIMILE (409) 833-0964

JUL 01 00 7 6364

ELIZABETH P. ARDANOWSKI
JOHN W. ARNOLD
BRIAN P. CHING
RUSSELL J. DePALMA
CHRISTI J. DICKSON
CHARLENE R. ECHOLS
WILLIAM A. FYNES
S. SHAYNE GARDNER
TROY D. HELLING
TANDY V. JOURET
MELISSA M. LEON
JEFFREY M. MAROSZ
MISTI D. MOSTELLER
TODD D. OGDEN
BLAIR M. PARTLOW
TODD H. RAMSEY
RACY RICHARDSON, III
TINA M. STAMPS

June 29, 2000

Mr. Ben DuBose
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, Texas 75219-4281

Re: Georgia Pacific Interrogatories

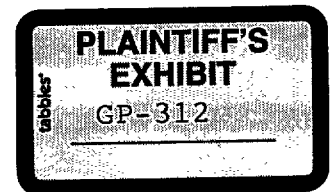
Dear Ben:

Pursuant to your recent request, please allow the following to serve as supplementation to Georgia Pacific's Response to Interrogatory Number 21 in the Dallas In Re Interrogatories:

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

ANSWER: The plant in Acme, Texas has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (66-p), Joint Compound (56-77), Bedding Compound (57-p), Topping Compound (59-p), All Purpose Joint Compound (56-p), Triple Duty Joint Compound (65-p), Speed Set/One Day (63-p), Central Mix (70-73), Texture (59-p), Patching Plaster (62-75), Spackling Compound (66-71), Lite Acoustic (61-64), or Kalite (56-59), in addition to many products that did not contain asbestos at any time. The above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Akron, New York plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (64-p), Joint Compound (64-77), Bedding Compound (63-p), Topping Compound (63-75), All Purpose Joint Compound (63-p), Triple Duty Joint Compound (unknown-p), Texture (63-p), Kalite (56-59), Lite Acoustic (59-62), Laminating Compound Ready Mix (69), or Drywall Adhesive (72), in addition to many products



Mr. Ben DuBose

June 29, 2000

Page 2

that did not contain asbestos at any time. The above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Blue Rapids, Kansas plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Joint Compound (63-77), Patching Plaster (59-75), Speed Set/One Day (unknown-p), or Lite Acoustic (60-62), in addition to many products that did not contain asbestos at any time. The above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Fort Dodge, Iowa plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (65; 81-p) or Lite Acoustic (59-62), in addition to many products that did not contain asbestos at any time. The above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Grand Rapids, Michigan plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Lite Acoustic (58-62), in addition to many products that did not contain asbestos at any time.

The Sigurd, Utah plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1956 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Lite Acoustic (59-62), in addition to many products that did not contain asbestos at any time.

The Brunswick, Georgia plant has been operated by Bestwall Gypsum Company or Georgia-Pacific from 1959 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (65), Patching Plaster (66-75), or Lite Acoustic (61-62), in addition to many products that did not contain asbestos at any time.

The Chicago, Illinois plant was operated by Georgia-Pacific from 1967 through 1981. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (67-81), Joint Compound (67-77), Bedding Compound (71-81), Topping Compound (67-76), All Purpose Joint Compound (67-81), Triple Duty Joint Compound (67-81), or Texture (67-81), in addition to many products that did not contain asbestos at any time. Each of the above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Marietta, Georgia plant has been operated by Georgia-Pacific from 1969 through the present. At various times, and intermittently during the time frames indicated in

Mr. Ben DuBose

June 29, 2000

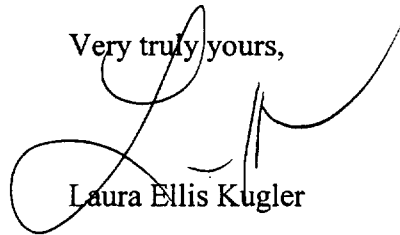
Page 3

this response, the plant manufactured Ready Mix (69-p), Joint Compound (69-77), Bedding Compound (69-p), Topping Compound (69-75), All Purpose Joint Compound (70-p), Triple Duty Joint Compound (69-p), Central Mix (71-73), or Texture (69-p), in addition to many products that did not contain asbestos at any time. The above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

The Milford, Virginia plant has been operated by Georgia-Pacific from 1973 through the present. At various times, and intermittently during the time frames indicated in this response, the plant manufactured Ready Mix (73-p), in addition to many products that did not contain asbestos at any time. Each of the above referenced products ceased to contain asbestos at various times, though Georgia-Pacific introduced and continues to sell asbestos free formulations of many of these products.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Laura Ellis Kugler', with a large, stylized initial 'L'.

Laura Ellis Kugler

LEK/kt

cc: Sheryl Ortman

FAUSERS\KKT\GPI\CORRES\DUBOSE\DUBOSE.LET