

EUGENE C. BLACKARD, ESQ. (State Bar No. 142090)
ARCHER NORRIS
A Professional Corporation
2033 N. Main Street, Suite 800
P. O. Box 8035
Walnut Creek, California 94596
(925) 930-6600

Attorneys for Defendant
GRAYBAR ELECTRIC COMPANY, INC.

RECEIVED
AUG 2 2006

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO

IN RE:

No. 828684

COMPLEX ASBESTOS LITIGATION

DEFENDANT GRAYBAR
ELECTRIC COMPANY, INC.'S
UPDATED RESPONSES TO
PLAINTIFF'S STANDARD
INTERROGATORIES TO ALL
DEFENDANTS PURSUANT TO
GENERAL ORDER NO. 129

Defendant, GRAYBAR ELECTRIC COMPANY, INC. ("GRAYBAR") hereby updates its responses to Plaintiff's Interrogatories pursuant to General Order No. 129 as follows. In responding to these interrogatories, responding party has provided such information as is presently available. However, discovery is continuing and responding party reserves the right to introduce such additional evidence or facts as later ascertained, and to present at trial further documentary or oral evidence for analysis not yet obtained or available.

INTERROGATORY NO. 1:

IDENTIFY the person verifying these answers on YOUR behalf.

RESPONSE TO INTERROGATORY NO. 1:

Alice Lehnhoff
Corporate Counsel
34 North Meramec Avenue
St. Louis, MO 63105

1 INTERROGATORY NO. 2:

2 State the date of first employment with YOU, and the dates and titles of each job position the person
3 verifying these interrogatories has held while employed by YOU.

4 RESPONSE TO INTERROGATORY NO. 2:

5 Legal Assistant from March, 1989 to April, 1992
6 Senior Legal Assistant II from April, 1992 to April, 1996
7 Senior Legal Assistant I from April, 1996 to June, 2004
8 Corporate Counsel from June, 2004 to present

9 INTERROGATORY NO. 3:

10 State whether or not YOU are a corporation, and if so, state:

- 11 A. YOUR correct corporate name.
12 B. YOUR state of incorporation.
13 C. The date of YOUR incorporation.
14 D. The address of YOUR principal place of business.
15 E. Whether or not YOU have ever held a certificate of authority to do business in the State of
16 California, and if so, the inclusive dates of any certificate.
17 F. If YOU are wholly owned or the majority interest of YOUR company is owned by another
18 business entity, state the entity's name and principal place of business.
19 G. Whether YOU have any business offices in California, and if so, YOUR principal place of
20 business in California.

21 RESPONSE TO INTERROGATORY NO. 3:

22 Yes.

- 23 A. Graybar Electric Company, Inc.
24 B. New York
25 C. December 11, 1925
26 D. 34 North Meramec Avenue, Clayton, Missouri
27 E. GRAYBAR has been qualified to do business in California since December 11, 1925
28 F. GRAYBAR is wholly owned by its employees and retirees
29 G. GRAYBAR has 21 branches in California. Each branch reports independently to corporate
30 offices in Missouri. GRAYBAR has no principal place of business in California.

31 Interrogatory No. 4:

32 Have YOU ever been identified, known, or done business under any other name in the State of
33 California?

1 **RESPONSE TO INTERROGATORY NO. 4:**

2 No.

3 **INTERROGATORY NO. 5:**

4 If your answer to Interrogatory No. 4 is in the affirmative, please state such name or names and the
5 time period during which THIS DEFENDANT was so known or identified.

6 **RESPONSE TO INTERROGATORY NO. 5:**

7 Not applicable

8 **Interrogatory No. 6:**

9 If YOU are not a corporation, what is YOUR business structure (Partnership, joint venture, sole
10 proprietorship, etc.).

11 **RESPONSE TO INTERROGATORY NO. 6:**

12 Not applicable.

13 **Interrogatory No. 7:**

14 If YOU are not a corporation, please IDENTIFY all persons or other entities with an ownership
15 interest in YOU.

16 **RESPONSE TO INTERROGATORY NO. 7:**

17 Not applicable.

18 **Interrogatory No. 8:**

19 If you are not a corporation, please state the following:

20 A. The address where the HISTORICAL RECORDS of THIS DEFENDANT ARE currently
21 located; and

22 B. The name, job title and current address of the Custodian for THIS DEFENDANT'S
23 HISTORICAL RECORDS.

24 As used herein, "HISTORICAL RECORDS" shall include all DOCUMENTS relating to the
25 formation of THIS DEFENDANT, all minutes of partners', general partners', or other owners' meetings, and
26 all DOCUMENTS this DEFENDANT'S merger with, acquisition of or purchase, or sale of or by any other
27 COMPANY.

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

Not applicable.

Interrogatory No. 9:

IDENTIFY YOUR custodian of Business Records.

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Carrie Johnson
3 Director of Organizational Design & Development
4 11885 Lackland Road
5 St. Louis, MO 63146

6 Interrogatory No. 10:

7 IDENTIFY the person or persons most knowledgeable about:

- 8 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;
9 B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;
10 C. YOUR contracting with others to do work involving use of handling of RAW ASBESTOS
11 OR ASBESTOS CONTAINING PRODUCTS.

12 **RESPONSE TO INTERROGATORY NO. 10:**

13 David Maxwell
14 Vice President, Sales
15 c/o Archer Norris

16 Interrogatory No. 11:

17 For DEFENDANTS involved in the MARKETING of ASBESTOS-CONTAINING PRODUCTS,
18 state the IDENTITY of physicians, medical directors and/or industrial hygienists employed by YOU during
19 the time frame or prior to the time YOU discontinued the marketing of such products. All other
20 DEFENDANTS need only respond as to medical directors and/or industrial hygienists or physicians
21 employed in the area of employee health and safety. PREMISES owners and domestic corporations need
22 only respond as to the United States.

23 **RESPONSE TO INTERROGATORY NO. 11:**

24 None.

25 Interrogatory No. 12:

26 Has any employee of THIS DEFENDANT testified by deposition or at trial on behalf of THIS
27 DEFENDANT in a third-party case, in which THIS DEFENDANT was a party, wherein the plaintiff has
28 alleged an asbestos-related injury? If so, for each such third-party case (except that Premises Defendants and
Contractor Defendants need answer only with respect to cases relating to sites within the GEOGRAPHIC
AREA) please state:

- A. the caption and case number
B. The court filing including state and county;
C. The date of deposition or trial testimony;
D. The name and address of plaintiff's counsel of record;
E. The name and address of the court reporter.

RESPONSE TO INTERROGATORY NO. 12:

Yes.

1 **Ralph L. Sackett** (deceased) testified by deposition in the following matters:

- 2 1. A. *Walberg v. Fibreboard*, Case No. 90-2-00223-5
3 B. Superior Court of Washington for Kitsap County
4 C. March 30, 1992
5 D. Schroeter, Goldmark & Bender, P.S., 500 Central Building, 810 Third Avenue,
6 Seattle, WA 98104
7 E. Venezia Reporting and Video Services, 1017 Olive Street, Suite L-2, St. Louis, MO
8 2. A. W.V. Civil Action 92-C-8888
9 B. Circuit Court of Kanawha County
10 C. August 31, 1993
11 D. Henderson & Goldberg, 1030 Fifth Avenue, Pittsburgh, PA 15219
12 E. Waller Reporting, Inc., 515 Olive Street, Suite 1506, St. Louis, MO 63101

13 **Kevin O'Rourke**

- 14 1. A. C.A. No. 93C-01-119; C.A. No. 94C-07-167; C.A. No. 94C-03-011; C.A. No. 94C-
15 01-49; CA 94C-12-12-274.
16 B. A court located in the State of Delaware
17 C. August 22, 1995
18 D. Jacobs & Crumplar, P.A., 2 East 7th Street, Wilmington DE 19801
19 E. Wilkes & McCall, Telephone Number (302) 426-1007

20 **Donald E. Lang**

- 21 1. A. *Pamela A. Ondik, et al. v. ACandS, Inc. et al.*, No. 00-2463
22 B. Commonwealth of Massachusetts, Middlesex, Superior Court Department
23 C. December 12, 2000.
24 D. Law Office of Michael C. Shepard, P.C., 205 Portland Street, Boston, MA 02114
25 E. Eppley Court Reporting, P.O. Box 532, Ashland, MA 01721

26 **David Maxwell**

- 27 1. A. *Alfred Todak v. Asbestos Defendants*, No. 320621
28

- 1 B. San Francisco Superior Court, State of California
2
3 C. January 10, 2002
4
5 D. Brayton Purcell, 222 Rush Landing Road, Novato, CA 94948
6
7 E. Tooker & Antz Court Reporting, 818 Mission Street, 5th Floor, San Francisco, CA
8
9 2. A. *Norman Hopkins v. Asbestos Defendants*, No. 408556
10 B. San Francisco Superior Court, State of California
11 C. May 9, 2003
12 D. Brayton Purcell, 222 Rush Landing Road, Novato, CA 94948
13 E. Aiken & Welch, One Kaiser Plaza, Suite 505, Oakland, CA

11 **James Estis**

- 12 A. *Douglas W. Cochrane* (WD: Carol S. Cochrane), Case No. 03-09321-NP
13 *Ronald Shuster* (WD: Lorraine E. Shuster), Case No. 03-09320-NP
14 *Nicholas/Betsy Waswick*, Case No. 04-01852-NP
15 B. Circuit Court for the County of Shiawassee, State of Michigan
16 C. August 9, 2005
17 D. Goldberg, Persky & White, P.C., 4800 Fashion Square Boulevard, Suite 260,
18 Saginaw, Michigan 48604
19 E. Bienenstock Court Reporting & Video, www.bienenstock.com

19 Interrogatory No. 13:

20 For each of the following, please state whether, at any time within the time frame or until such time
21 as any defendant which had been engaged in MARKETING RAW ASBESTOS or ASBESTOS-
22 CONTAINING PRODUCTS discontinued the MARKETING of such products, THIS DEFENDANT was a
23 member or paid dues for any representative of THIS DEFENDANT (excluding faculty members of
educational institutions) to be a member of the following:

- 24 A. American Conference of Governmental Industrial Hygienists;
25 B. American Industrial Hygiene Association;
26 C. American Petroleum Institute;
27 D. American Railroad Association;
28 E. Asbestos Cement Producers Association;
F. Asbestos Information Association (AIA)(please answer through date of your answers);
G. Asbestos Information Association/North American (AIA/NA)(please answer through date of
your answers);
H. Asbestos Textile Institute (ATT);

- 1 I. Industrial Hygiene Foundation and/or Industrial Health Foundation (IHF);
2 J. Industrial Mineral Insulation Manufacturers Institute;
3 K. Magnesia Insulation Manufacturers' Association;
4 L. Magnesia Silica Insulation Manufacturers Association;
5 M. Mineral Wool Institute;
6 N. National Insulation Manufacturers Association (NIMA);
7 O. National Safety Council;
8 P. New York Academy of Sciences;
9 Q. Quebec Asbestos Mining Association (QAMA);
10 R. Refractories Institute;
11 S. Safe Building Alliance (please answer through date of your answers);
12 T. Thermal Insulation Manufacturers Association (TIMA);
13 U. U.S. Maritime Commission;
14 V. IDENTIFY any other organization, associations or groups of manufacturers, miners,
15 distributors, importers, labelers, suppliers, and/or sellers of ASBESTOS-CONTAINING PRODUCTS of
16 which this DEFENDANT was a member;
17 W. IDENTIFY any such representative of THIS DEFENDANT.

18 **RESPONSE TO INTERROGATORY NO. 13:**

- 19 A - V. No.
20 W. Not applicable.

21 Interrogatory No. 14:

22 For each organization, association or other entity identified in YOUR Response to Interrogatory No.
23 13, please state:

- 24 A. The dates during which THIS DEFENDANT was a member;
25 B. The name(s) of any publication(s) received by THIS DEFENDANT from such association
26 or organization;
27 C. The name of any committee or subcommittee of which THIS DEFENDANT was a member,
28 and the dates of such committee or subcommittee membership.

29 **RESPONSE TO INTERROGATORY NO. 14:**

30 Not applicable.

31 Interrogatory No. 15:

32 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or
33 conclusions of any studies and/or tests conducted by Bonsib for Standard Oil of New Jersey relating to
34 asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so:

- 35 A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
36 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
37 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
38 production of documents.
39 B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;
40 C. State the IDENTITY of the custodian of such DOCUMENTS.
41 D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
42 DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

1 **RESPONSE TO INTERROGATORY NO. 15:**

2 No.

3 Interrogatory No. 16:

4 Had THIS DEFENDANT prior to 1973 received a copy or any portion of any studies and/or tests
5 conducted by any insurance company, including but not limited to Metropolitan Life Insurance Company
6 and Aetna Insurance relating to asbestos exposure in the workplace or the human health consequences of
exposure to asbestos? If so:

7 A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
8 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
production of documents.

9 B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

10 C. State the IDENTITY of the custodian of such DOCUMENTS.

11 D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

12 **RESPONSE TO INTERROGATORY NO. 16:**

13 No.

14 Interrogatory No. 17:

15 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS containing results or
16 conclusions of any studies and/or tests conducted by any laboratory, including but not limited to, the Saranac
Laboratory relating to asbestos exposure in the workplace or the human health consequences of exposure to
asbestos? if so:

17 A. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory and its
18 subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3) describe
such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
19 production of documents.

20 B. State the date upon which THIS DEFENDANT first received such DOCUMENTS;

21 C. State the IDENTITY of the custodian of such DOCUMENTS.

22 D. This interrogatory does not apply to DOCUMENTS contained in a library maintained by a
DEFENDANT hospital or a DEFENDANT'S library providing access to the general public.

23 **RESPONSE TO INTERROGATORY NO. 17:**

24 No.

25 Interrogatory No. 18:

26 Had THIS DEFENDANT (except for a defendant that is an educational institution) prior to 1973 ever
27 maintained a library (or libraries) which contained books, articles, periodicals, journals, and/or reference
materials that related to the subjects of asbestos, industrial hygiene, medicine, safety and/occupational
disease. If so, state:

28 A. The date each such library was established;

B. The location of each such library;

1 C. The IDENTITY of each librarian or other person in charge of such library.

2 **RESPONSE TO INTERROGATORY NO. 18:**

3 No.

4 Interrogatory No. 19:

5 With the exception of OSHA compliance, had THIS DEFENDANT (except for a defendant that is
6 an educational institution) prior to 1980 exchanged DOCUMENTS or communicated with any person or
7 other COMPANY expressly regarding the results of tests and/or studies relating to asbestos exposure in the
workplace or the human health consequences of exposure to asbestos? if so, state:

8 A. Each person or COMPANY with whom the information was exchanged or to whom it was
communicated.

9 B. The date(s) of any such exchanges or communications;

C. The IDENTITY of the custodian of such DOCUMENTS.

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

11 No.

12 Interrogatory No. 20:

13 Has any employee or designee of THIS DEFENDANT testified as a representative of THIS
14 DEFENDANT before the Occupational Safety and Health Administration, the National Institute of
Occupational Safety and Health, or any committee or subcommittee of the United States Congress relating to
15 asbestos exposure in the workplace or the human health consequences of exposure to asbestos? If so, please
state:

16 A. The entity before whom such testimony was given

17 B. The date(s) and location(s) of such testimony;

18 C. The IDENTITY of the individual(s) who so testified;

19 D. Whether any DOCUMENTS were presented to the entity before which testimony was
given;

20 E. Whether copies of DOCUMENTS presented were retained by THIS DEFENDANT and, if
so, state the IDENTITY of the custodian of such DOCUMENTS.

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

22 No.

23 Interrogatory No. 21:

24 Has THIS defendant (except for a defendant that is an educational institution) conducted, or caused
to be conducted, tests, and/or studies of ambient asbestos dust created during the manufacture, processing
25 and/or assembling for sale of ASBESTOS-CONTAINING PRODUCTS? If so, state:

26 A. Each manufacturing facility, including location and address, at which any such test and/or study was
conducted;

27 B. The date of each such test and/or study;

28 C. The individual(s) or entity conducting each such test and/or study;

D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or
conclusions of each such study;

1 E. The IDENTITY of the custodian of such DOCUMENTS.

2 **RESPONSE TO INTERROGATORY NO. 21:**

3 No.

4 Interrogatory No. 22:

5 Has THIS DEFENDANT (except for a defendant that is an educational institution) conducted, or
6 caused to be conducted, any tests and/or studies on ambient asbestos dust levels at any location or job site
7 where ASBESTOS-CONTAINING PRODUCTS were installed, utilized or removed? If so, for the first 5
8 tests and/or studies, state:

9 A. The location, including name and address, at which each such test and/or study was
10 conducted.

11 B. The individual(s) or entity conducting each such test and/or study;

12 C. The date of each such test and/or study;

13 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or
14 conclusions of each such test and/or study;

15 E. The IDENTITY of the custodian of such DOCUMENTS.

16 **RESPONSE TO INTERROGATORY NO. 22:**

17 No.

18 INTERROGATORY NO. 23:

19 Did THIS DEFENDANT (except for a defendant that is an educational institution) have any
20 laboratory or other similar type of facility anywhere in the United States at which it conducted, or caused to
21 be conducted, any tests and/or studies of ASBESTOS-CONTAINING PRODUCTS or RAW ASBESTOS
22 relating to the health consequences of asbestos or the dust generated by any use of asbestos or ASBESTOS-
23 CONTAINING PRODUCTS. If so, state:

24 A. The location, including name and address, at which each such test and/or study was
25 conducted.

26 B. The individual(s) or entity conducting each such test and/or study;

27 C. The date of each such test and/or study;

28 D. Whether THIS DEFENDANT has any DOCUMENTS containing the results and/or
conclusions of each such test and/or study;

E. The IDENTITY of the custodian of such DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 23:

No.

INTERROGATORY NO. 24:

Has THIS DEFENDANT made available to its employees a medical examination program to
determine the absence or presence of asbestos-related disease? If so, state:

A. Whether chest x-rays or pulmonary function tests were part of such program(s);

B. Whether participation in any such program was a mandatory condition of employment or
was voluntary;

C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);

1 D. The IDENTITY of the custodian of such DOCUMENTS.

2 **RESPONSE TO INTERROGATORY NO. 24:**

3 No.

4 **INTERROGATORY NO. 25:**

5 Prior to 1973, did any person file a Workers' Compensation claim for asbestos-related injury against
6 THIS DEFENDANT or against any Workers' Compensation insurance carrier which provided coverage for
THIS DEFENDANT? If so, state the total number of such claims and, for the first 20 such claims state:

- 7 A. The date of such claim.
8 B. The name of the claimant;
9 C. The case number;
10 D. The court in which the claim was filed;
11 E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS evidencing such
12 claims.

11 **RESPONSE TO INTERROGATORY NO. 25:**

12 No.

13 **Interrogatory No. 26:**

14 Does THIS DEFENDANT have insurance available to cover judgment(s) entered against it in
15 asbestos-related personal injury lawsuits? If so, state:

- 16 A. The name and principal place of business of any insurance carrier who has issued such
policy of insurance;
17 B. The number and effective date of each policy;
18 C. The amount(s) of coverage of each policy;
19 D. The applicable dates of coverage

18 **RESPONSE TO INTERROGATORY NO. 26:**

19 Yes. Royal Insurance Company

Years of Coverage	Carrier/Policy Number	Policy Limits (Occurrence/Annual Products Liability Aggregate)
12/31/64 - 12/31/65	RLG 098720	\$200,000/\$500,000
12/31/65 - 12/31/68	RLG 105640	\$200,000/\$500,000
12/31/68 - 12/31/71	PTG 606428	\$200,000/\$500,000
12/31/71 - 12/31/72	PTG 606421	\$200,000/\$500,000
12/31/72 - 12/31/73	PTG 606422	\$200,000/\$500,000
12/31/73 - 12/31/74	PTG 606423	\$200,000/\$500,000
12/31/74 - 12/31/75	PTG 606424	\$200,000/\$500,000
12/31/75 - 12/31/76	PTG 606425	\$200,000/\$500,000
12/31/76 - 12/31/77	PTG 606426	\$200,000/\$500,000
01/01/78 - 01/01/79	PTG 313041	\$200,000/\$500,000
01/01/79 - 01/01/80	PTG 313042	\$200,000/\$500,000 CSL
01/01/80 - 01/01/81	PTG 313043	\$200,000/\$500,000 CSL

01/01/81 – 01/01/82	PTG 313044	\$200,000/\$500,000 CSL
01/01/82 – 01/01/83	PLU 608890	\$200,000/\$500,000 CSL
01/01/83 – 01/01/84	PLU B77700	\$200,000/\$500,000 CSL
01/01/84 – 01/01/85	PLU B77700	\$200,000/\$500,000 CSL

Interrogatory No. 27:

State whether YOU have controlled, purchased, or in any way acquired any controlling interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, sold, supplied, distributed and/or otherwise placed RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce. If so, state:

- A. The name and address of said corporation or business entity;
- B. The dates YOU controlled, purchased or acquired any interest; and
- C. The nature of the business as it pertains to asbestos.

RESPONSE TO INTERROGATORY NO. 27:

No. GRAYBAR has not purchased the controlling interest in any corporation or other entity that mined, manufactured, produced, processed, compounded, sold, supplied, distributed and otherwise placed RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS in the stream of commerce.

Interrogatory No. 28:

State whether THIS DEFENDANT, between 1930 and 1985, has ever engaged in the following activities with regard to RAW ASBESTOS, and if so, state the inclusive dates of such activity:

- A. Mining;
- B. Milling;
- C. Supply;
- D. Importing;
- E. Processing;
- F. Distribution;
- G. Marketing;
- H. Sale;
- I. Brokering;

RESPONSE TO INTERROGATORY NO. 28:

No.

Interrogatory No. 29:

If YOUR answer to any of subparts of Interrogatory 28 regarding RAW ASBESTOS is in the affirmative, state:

A. The trade, brand name, and/or generic name of such RAW ASBESTOS milled or MARKETING in any form or quantity between 1930 and 1985:

B. the date(s) such RAW ASBESTOS was first placed on the market, including the date(s) such RAW ASBESTOS was first marketed;

- 1. On an experimental basis;

- 1 2. On a test basis;
2 3. For sale.
3 C. The date(s) such Raw Asbestos:
4 1. Ceased to be produced; or
5 2. Was recalled from the market, if ever.
6 D. A description of the chemical composition of such RAW ASBESTOS, including the type
7 and/or grade of asbestos;
8 E. A description of the physical appearance and nature of such RAW ASBESTOS, including
9 any color coding, distinctive marking and/or logo on the packaging or container;
10 F. A detailed description of the intended use of such RAW ASBESTOS, including any
11 temperature limits for each such use;
12 G. Whether such RAW ASBESTOS was on the U.S. Government's "Qualified Products List,"
13 and if so, the inclusive dates it was on such list;
14 H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been sold. As to each such,
15 state:
16 I. Whether any of THIS DEFENDANT'S RAW ASBESTOS has, at any time, been sold,
17 shipped, or otherwise distributed, used on installed to or at any COMPANY (including power company or
18 utility), governmental agency or entity, shipyard, distributor, refinery, contractor, supplier, PREMISE owner
19 or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA and whether any of THIS
20 DEFENDANT's RAW ASBESTOS has at any time, been sold to any manufacturer, or manufacturing
21 facility, of ASBESTOS-CONTAINING PRODUCTS. If so, state:
22 1. The names of each such Company, governmental agency or entity, shipyard, distributor,
23 supplier, manufacturer or refinery;
24 2. The inclusive dates of each such sale, and the amount (quantity) and the trade brand name of
25 such RAW ASBESTOS sold;
26 3. The manner of shipment (e.g. boat, rail, etc.)
27 4. Whether you have any records indicating any such sale or shipment and, if so, the name,
28 address and job classification of each person who currently has possession of such records.
29 5. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
30 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
31 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
32 production of documents.

33 **RESPONSE TO INTERROGATORY NO. 29:**

34 Not applicable.

35 Interrogatory No. 30:

36 Between 1930 and 1985, did YOU ever engage in any of the activities listed below with regard to
37 ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such activity:

- 38 A. Supply;
39 B. Importing;
40 C. Distribution;
41 D. Marketing;
42 E. Sale;
43 F. Labeling;
44 G. Manufacturing;
45 H. Brokering.

46 ///

1 **RESPONSE TO INTERROGATORY NO. 30:**

2 Yes. GRAYBAR distributed asbestos-containing products beginning in 1926.

3 Interrogatory No. 31:

4 If YOUR answer to any of subparts of Interrogatory 30 regarding "ASBESTOS-CONTAINING
5 PRODUCTS" is in the affirmative, state:

6 A. The trade, brand name, and/or generic name of such ASBESTOS-CONTAINING
PRODUCT MARKETED in any form or quantity between 1930 and 1985:

7 B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first placed on the
market, including the date(s) each such ASBESTOS-CONTAINING PRODUCT was first MARKETED;

8 1. On an experimental basis;

9 2. On a test basis;

10 3. For sale.

11 C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

12 1. Ceased to be produced; or

13 2. Was recalled from the market, if ever.

14 D. A description of the chemical composition of each such ASBESTOS-CONTAINING
PRODUCT, including the type and/or grade of asbestos and or asbestos fiber contained in each such product
15 and the quantitative percentage of asbestos or asbestos fiber in each such product, and all non-asbestos
16 components of the ASBESTOS-CONTAINING PRODUCT, and if the chemical composition changed over
17 time, the inclusive dates of each formulation;

18 E. A description of the physical appearance and nature of each such ASBESTOS-
CONTAINING PRODUCT, including any color coding, distinctive marking and/or logo, either on the
product or on the packaging;

19 F. A detailed description of the intended use of each such ASBESTOS-CONTAINING
PRODUCT, including any temperature limits for each such use;

20 G. Whether any such ASBESTOS-CONTAINING PRODUCT was on the U.S. Government's
"Qualified Products List," and if so, the inclusive dates it was on such list;

21 H. The name and address of the supplier of the RAW ASBESTOS used in each such product
and the time period of such supply;

22 I. Whether any of THIS DEFENDANT'S RAW ASBESTOS or ASBESTOS-CONTAINING
PRODUCTS have, at any time, been sold, shipped, or otherwise distributed, to any COMPANY (including
power company or utility), governmental agency or entity, shipyard, distributor, refinery, contractor,
23 supplier, PREMISE owner or occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC AREA.
If so state:

24 1. The names of each such COMPANY, governmental agency or entity, shipyard,
distributor, supplier, manufacturer, refinery, contractor, PREMISE owner or occupant, ship owner,
PREMISE or site;

25 2. The inclusive dates of each such sale, shipment, distribution, use or installation and
the amount (volume) and the trade or brand name of each such ASBESTOS-CONTAINING PRODUCT
sold;

26 3. Whether you have any records indicating any such sale, shipment, distribution, use
or installation and, if so, the name, address and job classification of each person who currently has
possession of such records.

27 4. Whether you have any records indicating any such sale or shipment and, if so, the
name, address and job classification of each person who currently has possession of such records.

28 J. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for

1 production of documents.

2 **RESPONSE TO INTERROGATORY NO. 31:**

3 A-I. GRAYBAR is a distributor. It no longer has sufficient information upon which to fully
4 answer this interrogatory. GRAYBAR locations keep sales invoices for six years and the
5 current year pursuant to its retention policy. Records reflecting information for the years
6 1930 through 1985 have been discarded. As GRAYBAR is only a distributor, it does not
7 know what form of asbestos may have been contained in any particular product or the name
8 and address of the supplier of any raw asbestos that may have been used in each product.

9
10 F. GRAYBAR believes that within the applicable time period it distributed asbestos-containing
11 products. Those products are identified in GRAYBAR catalogs identified as follows.
12 These archival, fragile, one of a kind catalogs are available for review at GRAYBAR's
13 corporate offices at 34 North Meramec Avenue, Clayton, Missouri upon reasonable notice
14 by contacting GRAYBAR's Custodian of Records through its attorney-of-record, Archer
15 Norris.

Catalog Number	Year of Issue	Number of Pages
100	1926	1085
101	1934	735
102	1941	1072
103	1948	1116
104	1952	1352
105	1958	1628
106	1967	1116
61	1961	214
62	1962	232
63	1963	236
25	1965	270
26	1966	242
27	1967	238
28	1969	256
29	1970	248
30	1971	248
31	1972	248
32	1973	238
33	1974	254
34	1975	240
35	1977	276

36	1979	326
37	1982	295

Interrogatory No. 32 (PREMISES DEFENDANTS only)

Did YOU install, remove, or handle or contract to have others install, remove, or handle RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS at any PREMISES in the GEOGRAPHIC AREA which PREMISES is at issue as to YOU in San Francisco Superior Court asbestos litigation a of the date of your answers to these interrogatories? If so:

A. IDENTIFY the PREMISES

B. For each of the PREMISES:

1. State the nature of your ownership or possessory interest;
2. State the inclusive date of that interest;
3. IDENTIFY the party from whom that interest was acquired.
4. IDENTIFY the party, if any, to whom that interest was transferred.

C. IDENTIFY every contract to which YOU were a party or of which you have knowledge wherein the performance of such contract involved the installation, removal, disturbing or handling of any RAW ASBESTOS OR asbestos-CONTAINING PRODUCTS at YOUR PREMISES. For each such contract:

1. IDENTIFY the parties to the contract
2. Provide a general description and specific location of the work to be performed by each party to the contract;
3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the performance of the contract;
4. State the dates of the contract and the dates of performance;

D. Except as provided in response to subpart (c), has any work other than routine maintenance been done on or to the PREMISES that involved the installation, removal, disturbing or handling of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS? If so, for each such instance:

1. State the inclusive dates of the work;
2. Provide a general description and specific location of the work;
3. State whether the work was done by YOU and/or YOUR employees;
4. IDENTIFY and describe the NATURE of the RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS installed, removed, handled or disturbed;
5. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS-CONTAINING PRODUCTS were acquired.

E. Has any asbestos abatement effort been made at the PREMISES? If so, for each such effort:

1. IDENTIFY who did the work;
2. State the inclusive dates thereof;
3. State whether samples were taken, and, if the samples still exist, IDENTIFY the custodian of the samples;
4. State whether any material was tested, and, if so, what were the results of each test;
5. IDENTIFY each test result with sufficient particularity for purposes of a request for production of documents, or, in the alternative, attach a copy to YOUR answers to these interrogatories.

F. Except for insurance coverage litigation, have you filed suit against, or otherwise sought to recover from, any person or entity for some or all of the cost of asbestos abatement or for the property damage allegedly caused by the presence of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS on the PREMISES identified in response to subpart (A) above? If so:

1. IDENTIFY the person or entity against whom YOU have filed suit or otherwise sought to recover;
2. If YOU have filed suit, state the court in which the action was filed, the date on

1 which it was filed, IDENTIFY all Plaintiffs and Defendants and their counsel of record;

2 3. State whether or not the case has been resolved, and if so, what was the status or
3 disposition.

4 G. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
5 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
6 describe such DOCUMENTS with sufficient particularity that they maybe made the subject or a request for
7 production of documents.

8 H. IDENTIFY the person(s) presently most knowledgeable about the information south in this
9 interrogatory or its subparts.

10 **RESPONSE TO INTERROGATORY NO. 32:**

11 Not applicable.

12 Interrogatory No. 33 (CONTRACTOR DEFENDANTS only)

13 At any time between 1930 and 1985, did YOU hold a contractor's license in the State of California?
14 If so:

15 A. IDENTIFY each license by type, date and number.

16 B. If on the date of your answers YOU are a defendant in four or more asbestos actions in Sa
17 Francisco superior Court, IDENTIFY each job or contract that YOU performed (directly or through one or
18 more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on
19 such date, and in any PREMISES of 50,000 square feet or more in the GEOGRAPHIC AREA which job or
20 contract involved installation, removal, disturbing or handling RAW ASBESTOS or ASBESTOS-containing
21 products. (Alternatively, at your option, you may IDENTIFY each job or contract YOU performed (directly
22 or through one or more subcontractors) during this time frame for all work, or for all work on PREMISES of
23 50,000 square feet or more, in the GEOGRAPHIC AREA.) as to each such job or contract:

24 1. IDENTIFY the location (including name of ship, if applicable) where the job or
25 work was performed.

26 2. State the date of the contract or the inclusive dates of the work;

27 3. IDENTIFY the person or entity with whom you contracted;

28 4. State your job or contract number.

29 C. If on the date of your answers you are not a defendant in four or more asbestos actions in
30 San Francisco Superior Court, IDENTIFY each job or contract that YOU performed (directly or through one
31 or more subcontractors) during this time period for work in any PREMISES which is at issue as to YOU on
32 such date. As to each such job or contract:

33 1. IDENTIFY the location (including name of ship, if applicable) where the job or
34 work was performed;

35 2. State the date of the contract or the inclusive dates of the work;

36 3. IDENTIFY the person or entity with whom you contracted;

37 4. State your job or contract number.

38 **RESPONSE TO INTERROGATORY NO. 33**

39 Not applicable.

40 Interrogatory No. 34:

41 Did any of the distributors identified in your Answer to Interrogatory Nos: 29 and 31 above have an
42 exclusive distributorship? If so, state the relevant time period.

RESPONSE TO INTERROGATORY NO. 34:

Not applicable.

Interrogatory No. 35:

If THIS DEFENDANT entered into any agreements for the rebranding of any ASBESTOS-CONTAINING PRODUCTS by THIS DEFENDANT for resale or distribution by another person or entity, describe each agreement's terms and the parties to said agreement, the duration of the agreement, and the name of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 35:

Responding party has made a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to propounding parties and responds that to the best of its knowledge, GRAYBAR did not enter into any rebranding agreements.

Interrogatory No. 36:

If THIS DEFENDANT entered into any agreements for the rebranding of ASBESTOS-CONTAINING PRODUCTS manufactured, sold, supplied or distributed by another person or entity for resale or distribution by YOU, describe each of the agreements and the parties to said agreement, the terms, the duration, and the names of each product(s) and/or material(s) covered by each such agreement.

RESPONSE TO INTERROGATORY NO. 36:

Not applicable.

Interrogatory NO. 37:

As to RAW ASBESTOS and to each such ASBESTOS-CONTAINING PRODUCT listed in YOUR responses to Interrogatories No. 29 and 31 did DEFENDANT warn of the health hazards of asbestos? If so, state for each such warning:

- A. The content, size, color, and location; whether the warning appeared on the material and/or on the container, and/or was placed on a tag; whether the warning was included in contracts; whether the warning was included in advertising or other promotional materials.
- B. State whether you have any photographs thereof;
- C. The inclusive dates on which you used each such warning;
- D. State all changes you made in such warnings and the dates of such changes; and
- E. Identify the person most knowledgeable about your warnings and warning policy.

RESPONSE TO INTERROGATORY NO. 37:

No. GRAYBAR is only a distributor and not a manufacturer. GRAYBAR did not change the manufacturer's packaging. If any warnings were on the packaging, the manufacturer(s) would have placed

1 the wording on packaging.

2 Interrogatory No. 38:

3 With respect to each of YOUR ASBESTOS-CONTAINING PRODUCTS, state whether THIS
4 DEFENDANT's name, a trademark, logos, color coding, or other identifying markings ever appeared on the
5 actual product itself. if so, IDENTIFY each such product, state when the practice to place such identifying
6 markings upon the product was begun and when it ended, if applicable, and describe in detail the pertinent
7 marking(s) and the purpose, if any, of such markings.

8 **RESPONSE TO INTERROGATORY NO. 38:**

9 Responding party has made a reasonable and good faith effort to obtain the information by inquiry to
10 other natural persons or organizations, except where the information is equally available to propounding
11 parties. It is possible that reels on which wire was shipped may have contained GRAYBAR's name for
12 shipping and identification purposes. There is no information available to confirm this method and practice
13 of identification for the time period 1930 through 1985.

14 Interrogatory No. 39:

15 Between the years 1930 to 1985, did THIS DEFENDANT purchase or otherwise acquire any
16 ASBESTOS-CONTAINING PRODUCT lines from another person or entity? If so, state for each such
17 purchase:

- 18 A. Date of purchase or acquisition;
19 B. Terms of purchase or acquisition agreement;
20 C. Either (1) attach all DOCUMENTS evidencing said acquisition or (2) attach disks
21 containing such data, or (3) describe such documents with sufficient particularity that they may be made the
22 subject of a request for production of documents.
23 D. Trade, brand, and/or generic name of each such product line so acquired;
24 E. Name of the person or entity from whom YOU purchased or acquired each such
25 ASBESTOS-CONTAINING PRODUCT line; and
26 F. Location of any manufacturing facilities so acquired, and the type of ASBESTOS-
27 CONTAINING PRODUCTS manufactured therein.

28 **RESPONSE TO INTERROGATORY NO. 39:**

As a distributor, GRAYBAR, purchased asbestos-containing products from various manufacturers
for retail distribution. Whether or not this type of purchase is considered acquiring "any ASBESTOS-
CONTAINING PRODUCT lines" is not clearly evident. The manufacturers of said products may be listed
in product catalogs previously identified in Response No. 31.

Interrogatory No. 40:

Between the years 1930 to 1985, did THIS DEFENDANT sell any ASBESTOS-CONTAINING

1 PRODUCT line to another person or entity? If so, state for each such sale:

- 2 A. Date of sale;
3 B. Terms of sales agreement;
4 C. Either (1) attach all DOCUMENTS evidencing said sale, or (2) attach disks containing such
5 data, or (3) describe such DOCUMENTS with sufficient particularity that they may be made the subject of a
6 request for production of documents.
7 D. Trade, brand, and/or generic name of each such product line sold;
8 E. Name of person or entity to whom you sold each such ASBESTOS-CONTAINING
9 PRODUCTS line; and
10 F. Location of any manufacturing facilities so sold, and the type of ASBESTOS-
11 CONTAINING PRODUCTS manufactured therein.

12 **RESPONSE TO INTERROGATORY NO. 40:**

13 Responding party incorporates by references its response to Interrogatory No. 39.

14 **INTERROGATORY NO. 41:**

15 IDENTIFY all brochures, pamphlets, catalogs or other advertising relating to ASBESTOS-
16 CONTAINING PRODUCTS and/or RAW ASBESTOS which THIS DEFENDANT manufactured, sold,
17 distributed or supplied from the year 1930 to 1985. For each such document, state:

- 18 A. A description of the document;
19 B. the year it was printed;
20 C. The period of time in which it was used;
21 D. The purpose of such documents;
22 E. Whether the documents or copies of said documents presently exist;
23 F. If said documents or copies still exist, where they are located; and
24 G. The IDENTITY of the custodian of such documents.

25 **RESPONSE TO INTERROGATORY NO. 41:**

26 Responding party incorporates by reference its response to Interrogatory No. 31, F.

27 **Interrogatory No. 42:**

28 State if YOU have or had within YOUR corporate or other business structure any CONTRACT
UNITS.

29 **RESPONSE TO INTERROGATORY NO. 42:**

30 No.

31 **Interrogatory No. 43:**

32 State whether or not any of YOUR CONTRACT UNITS installed and/or removed RAW
33 ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS in the GEOGRAPHIC AREA at any time
34 between 1930 and 1985. If so:

- 35 A. State the business addresses and name of the CONTRACT UNIT;
36 B. State the inclusive periods of time the CONTRACT UNITS were working in the
37 GEOGRAPHIC AREA;
38 C. State the name and address of each job site within the GEOGRAPHIC AREA and the dates

1 the CONTRACT UNIT worked at those job sites, and, IDENTIFY the RAW ASBESTOS and/or
2 ASBESTOS-CONTAINING PRODUCTS installed or removed on each occasion;

3 D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
4 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
5 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
6 production of documents.

7 **RESPONSE TO INTERROGATORY NO. 43:**

8 Not applicable.

9 Interrogatory No. 44:

10 When do YOU contend that THIS DEFENDANT first became aware that there is an association
11 between asbestos exposure and disease in human beings?

12 **RESPONSE TO INTERROGATORY NO. 44:**

13 Responding party has made a reasonable and good faith effort to obtain the information requested by
14 inquiry to other natural persons or organizations, except where the information is equally available to
15 propounding parties and responds: GRAYBAR believes that it first became aware of the alleged association
16 between asbestos exposure and disease in human beings at the same time the general public became aware of
17 any such association sometime during the 1980's.

18 Interrogatory No. 45:

19 How do YOU contend that THIS DEFENDANT first became aware that there is an association
20 between asbestos exposure and disease in human beings.

21 **RESPONSE TO INTERROGATORY NO. 45:**

22 Responding party has made a reasonable and good faith effort to obtain the information requested by
23 inquiry to other natural persons or organizations, except where the information is equally available to
24 propounding parties and responds: GRAYBAR believes that it first became aware of the alleged association
25 between asbestos exposure and disease in human beings from articles or communications made available to
26 the general public sometime during the 1980's.

27 Interrogatory No. 46:

28 Either (1) attach all DOCUMENTS evidencing the information upon which YOUR contentions in
YOUR answers to Interrogatories No. 44 and No. 45 are based, or (2) attach disks containing such data, or
(3) describe such documents with sufficient particularity that they may be made the subject of a request for
production of documents.

1 **RESPONSE TO INTERROGATORY NO. 46:**

2 GRAYBAR has no such documents.

3
4 Interrogatory No. 47:

5 When did THIS DEFENDANT first warn its employees that exposure to asbestos could be
6 hazardous to human health? State:

- 7 A. Whether the first such warning was written or oral;
8 B. Whether copies of DOCUMENTS containing such warning exist;
9 C. The IDENTITY of the custodian of such DOCUMENTS;
10 D. The content of the warning.

11 **RESPONSE TO INTERROGATORY NO. 47:**

12 Responding party has made a reasonable and good faith effort to obtain the information requested by
13 inquiry to other natural persons or organizations, except where the information is equally available to
14 propounding parties and responds: to its knowledge, GRAYBAR did not warn its employees as to the
15 hazards of asbestos exposure.

16 Interrogatory No. 48:

17 Did THIS DEFENDANT ever issue a written COMPANY policy discontinuing warning its
18 employees that exposure to asbestos could be hazardous to human health? If so,

- 19 A. Provide the date;
20 B. Describe the circumstances; and
21 C. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
22 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
23 describe such DOCUMENTS with sufficient particularity that they may be made the subject of a request for
24 production of documents.

25 **RESPONSE TO INTERROGATORY NO. 48:**

26 No.

27 Interrogatory No. 49:

28 Did THIS DEFENDANT provide any Independent Contractor or Subcontractor within the
GEOGRAPHIC AREA with a written warning that exposure to asbestos could be hazardous to human
health.

RESPONSE TO INTERROGATORY NO. 49:

Responding party has made a reasonable and good faith effort to obtain the information requested by
inquiry to other natural persons or organizations, except where the information is equally available to

1 propounding parties and responds: GRAYBAR would have passed on any warnings issued with the product
2 by the manufacturer. GRAYBAR, however, would not have issued any writings of its own.

3 Interrogatory No. 50:

4 Has THIS DEFENDANT been cited for or otherwise charged by a public agency with a violation in
5 the GEOGRAPHIC AREA of any statute, ordinance, safety order, regulation, or law pertaining to asbestos
6 exposure? For each occasion, IDENTIFY:

- 7 A. The code section, safety order, statute, or regulation for which THIS DEFENDANT had
8 been cited or otherwise charged;
9 B. The date(s) thereof.
10 C. The agency or other governmental unit which issued the citation or otherwise charged YOU.
11 D. All persons known to YOU with information relevant to the incident.
12 E. What was the ultimate resolution.

13 **RESPONSE TO INTERROGATORY NO. 50:**

14 No.

15 Interrogatory No. 51:

16 If this DEFENDANT has ever owned or operated a railroad, state:

- 17 A. The IDENTITY of each such railroad, including the name(s) of such railroad during the
18 time period of YOUR ownership and/or operation, the principal place of business of such railroad and the
19 dates of YOUR ownership and/or operation;
20 B. The geographic area of operation of such railroad;
21 C. The name(s) of such railroad prior to YOUR ownership and/or operation;
22 D. The IDENTITY of the person or entity from whom YOU purchased your ownership or
23 operating interest, and the date of such purchase;
24 E. The IDENTITY of the person or entity to whom YOU sold your ownership or operating
25 interest, and the date of such sale.
26 F. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;
27 G. The IDENTITY of the custodian of such DOCUMENTS;
28 H. To the extent that information has not been given in answers to Interrogatory Nos. 32 and
33, the information requested in Interrogatory Nos. 32 and 33, for each railroad owned or operated by YOU.

29 **RESPONSE TO INTERROGATORY NO. 51:**

30 No.

31 Interrogatory No. 52:

32 If DEFENDANT has ever owned or operated a shipyard, state:

- 33 A. The IDENTITY of each such shipyard, including the name(s) of such shipyard during the
34 time period of YOUR ownership and/or operation, the place of business of such shipyard and the dates of
35 YOUR ownership and/or operation;
36 B. the name(s) of such shipyard prior to YOUR ownership and/or operation;
37 C. The IDENTITY of the person or entity to whom YOU sold your ownership or operating
38 interest, and the date of such sale;
39 D. Whether copies of DOCUMENTS evidencing your ownership/operation and/or sale exist;

1 E. Whether any representative of THIS DEFENDANT attended the Maritime Commission
2 Conference in December 1942 in Chicago, Illinois? If so, IDENTIFY any such representative of THIS
3 DEFENDANT;

4 F. The IDENTITY of the Custodian of such DOCUMENTS;

5 G. To the extent that information has not been given in answers to Interrogatory No. 32, the
6 information requested in Interrogatory No. 32, for each shipyard owned or operated by YOU.

7 **RESPONSE TO INTERROGATORY NO. 52:**

8 Not applicable. GRAYBAR has never owned or operated a shipyard.

9 Interrogatory No. 53:

10 At any time between 1930 and 1985, did you import, export, ship, transship or otherwise transport
11 RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS into, out of or through any port in the
12 GEOGRAPHIC AREA? If so, for each occasion:

13 A. IDENTIFY and describe the NATURE and amount of RAW ASBESTOS and/or
14 ASBESTOS-CONTAINING PRODUCTS;

15 B. IDENTIFY the ship or ships (including the owners and operators thereof) onto or from
16 which the RAW ASBESTOS and/or ASBESTOS-CONTAINING PRODUCTS were loaded, unloaded or
17 transshipped;

18 C. State the dates, port and pier involved for each occasion;

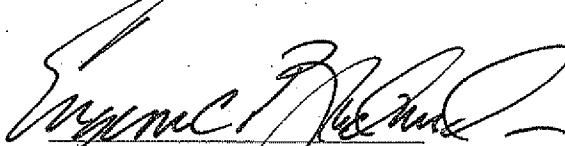
19 D. Either (1) attach all DOCUMENTS evidencing the information sought in this Interrogatory
20 and its subparts to your answers to these Interrogatories, or (2) attach disks containing such data, or (3)
21 describe such DOCUMENTS with sufficient particularity that they may be made subject of a request for
22 production of documents.

23 **RESPONSE TO INTERROGATORY NO. 53:**

24 No.

25 DATED: July 31 2006

26 ARCHER NORRIS

27 

28 Eugene C. Blackard, Jr.

Attorneys for Defendant

GRAYBAR ELECTRIC COMPANY, INC.

3 VERIFICATION

4 I have read the foregoing DEFENDANT GRAYBAR ELECTRIC COMPANY, INC.'S
5 UPDATED RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES TO ALL
6 DEFENDANTS PURSUANT TO GENERAL ORDER NO. 129 and know its contents.

7 I am a party to this action. The matters stated in it are true of my own knowledge
8 except as to those matters which are stated on information and belief, and as to
9 those matters I believe them to be true.



11 I am Corporate Counsel of Graybar Electric Company, Inc., a party to this action,
12 and am authorized to make this verification for and on its behalf, and I make this
13 verification for that reason. I have read the foregoing document(s). I am
14 informed and believe and on that ground allege that the matters stated in it are
15 true.

16 I am one of the attorneys of record for Defendant, a party to this action. Such
17 party is absent from the county in which I have my office, and I make this
18 verification for and on behalf of that party for that reason. I have read the
19 foregoing document(s). I am informed and believe and on that ground allege that
20 the matters stated in it are true.

21 Executed at Clayton, Missouri on this 28th day of July, 2006.

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

24 
25 Alice Lehnhoff

1 **PROOF OF SERVICE**

2 **Name of Action: In Re: Complex Asbestos Litigation**
3 **Court and Action No: San Francisco County Superior Court No. 828684**

4 I, Rakia Grant-Smith, declare that I am over the age of eighteen years, and not a party to
5 this action or proceeding. My business address is 2033 North Main Street, Suite 800, P.O. Box
6 8035, Walnut Creek, CA 94596. On August 1, 2006, I caused the following document(s) to be
7 served:

8 **GRAYBAR ELECTRIC COMPANY, INC.'S UPDATED RESPONSES TO PLAINTIFF'S**
9 **STANDARD INTERROGATORIES TO ALL DEFENDANTS PURSUANT TO**
10 **GENERAL ORDER NO. 129**

- 11 ☒ by placing a true copy of the document(s) listed above, enclosed in a sealed envelope,
12 addressed as set forth below, for collection and mailing on the date and at the business
13 address shown above following our ordinary business practices. I am readily familiar
14 with this business' practice for collection and processing of correspondence for mailing
15 with the United States Postal Service. On the same day that a sealed envelope is placed
16 for collection and mailing, it is deposited in the ordinary course of business with the
17 United States Postal Service with postage fully prepaid.
- 18 ☐ by placing a true copy of the document(s) listed above enclosed in a sealed envelope,
19 with postage fully prepaid thereon, in the United States mail at Walnut Creek,
20 California addressed as set forth below.
- 21 ☐ by having a true copy of the document(s) listed above transmitted by facsimile to the
22 person(s) at the facsimile number(s) set forth below before 5:00 p.m. The transmission
23 was reported as complete without error by a report issued by the transmitting facsimile
24 machine. A true and correct copy of the transmission report is attached hereto.
- 25 ☐ by having personally delivered a true copy of the document(s) listed above, enclosed in
26 a sealed envelope, to the person(s) and at the address(es) set forth below.
- 27 ☐ by having personal delivery by _____ of a true copy of the document(s)
28 listed above, enclosed in a sealed envelope, to the person(s) and at the address(es) set
forth below.

29 *Please see attached Service List*

30 I declare under penalty of perjury that the foregoing is true and correct. Executed on
31 August 1, 2006, at Walnut Creek, California.

32 
33 _____
34 Rakia Grant-Smith

Name of Action: In Re: Complex Asbestos Litigation
Court and Action No: San Francisco County Superior Court

Service List

Harowitz & Tigerman
450 Sansome Street, 3rd Flr.
San Francisco, CA 94111

Brayton Purcell
222 Rush Landing Road
P.O. Box 2109
Novato, CA 94948

The Cartwright Law Firm, Inc.
222 Front Street, 5th Floor
San Francisco, CA 94111

Law Offices of Clapper & Patti
Marina Office Plaza
2330 Marinship Way, Suite 140
Sausalito, CA 94965

Law Offices of Christopher E. Grell
360 22nd Street, Suite 320
Oakland, CA 94105

The Wartnick Law Firm
650 California Street, 15th Flr.
San Francisco, California 94111

Paul & Hanley
1608 Fourth Street, Suite 300
Berkeley, CA 94710

Visse & Yanez
1375 Sutter Street, Suite 120
San Francisco, CA 94109

Berry & Berry
P.O. Box 16070
Oakland, CA 94610

Bruce L. Ahnfeldt, Esq.
P.O. Box 6078
Napa, CA 94581

Brent Coon & Associates [Cheryl White]
44 Montgomery Street, Suite 800
San Francisco, CA 94104

Casey Gerry Reed & Schenk
111 Laurel St., Suite 619
San Diego, CA 92101

Law Offices of Annee Della Donna
2385 Hill View Drive
Laguna Beach, CA 92651

Law Offices of Anthony E. Vieira
27200 Agoura Road, Suite 101
Calabasas, CA 91301

Hackard & Holt
11335 Gold Express Dr., Suite 155
Gold River, CA 95670

Hobin Shingler & Simon LLP
1011 A Street, Antioch
CA 94509

Kaeske Reeves
6301 Gaston Avenue
Suite 735
Dallas, TX 75214

Kazan McClain Abrams Fernandez Lyons
& Farris
171 Twelfth Street, Suite 300
Oakland, CA 94607

Levin, Simes & Kaiser LLP
One Bush St., 14th Flr
San Francisco, CA 94104

Snyder Miller & Orton
111 Sutter Street, Suite 1950
San Francisco, CA 94104

The Cartwright Law Firm, Inc.
222 Front Street, Fifth Floor
San Francisco, CA 94111

Waters & Kraus LLP
300 North Continental Blvd., Suite 500
El Segundo, CA 90245