



BARON & BUDD

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS

THE CENTRUM
3102 OAK LAWN AVENUE
SUITE 1100

DALLAS, TEXAS 75219-4281

(214) 521-2605

TELECOMER (214) 320-1181

March 15, 1996

FREDERICK M. BARON
RUSSELL W. BUDD
BRENT M. ROSENTHAL
LISA A. BLUE, PH.D.
MARY E. SKELNIK
STEVEN D. WOLENS
DIANE M. ANDREW
PETER A. KRAUS
JANICE PENNINGTON
SAM T. RICHARD
JENNIFER A. CURRIE
AMY M. BLUMENTHAL
LISA R. KIVETT
L. ANGELYN SCHMID
STEVE BAUGHMAN
JEFFREY B. SIMON

FAX: 214/953-5455

PATRICK N. HAINES
ALLEN M. STEWART
KAY G. REEVES
LISA JERGE-LESNIAK
KAREN M. GAMMON
STEVEN M. GRUBER
KIMBERLY A. CASTLES
KEITH M. COLE, JR.
MELUSSA R. MUTTS
DAVID DENNY
CHRISTINA E. MANCUSO
LAURA J. VAN PELT
LEANNE JACKSON
LAURIE J. MEGGESIN
MICHAEL L. KAESKE

*LICENSED ONLY IN IL AND MO

Ms. Laura Ellis Kugler
DeHay & Elliston, L.L.P.
717 N. Harwood St., Suite 1500
Dallas, Texas 75201-6508

Dear Kugler:

This letter is to confirm that Georgia Pacific Corporation has agreed that the attached Request for Admissions and Response may be used, and will have effect, in any future trial involving the law firm of Baron & Budd, P.C. The attached Request for Admissions is dated February 1, 1996 and was filed in In Re: Asbestos Litigation with the District Court of the 285th Judicial District of Bexar County, Texas. This agreement will avoid the necessity of serving identical Requests for Admission in each jurisdiction where litigation is pending against Georgia Pacific Corporation.

If the above accurately reflects our agreement regarding these Requests for Admission, please so indicate by signing this letter in the space provided below and returning it to me pursuant to Rule 11 of the Texas Rules of Civil Procedure.

Sincerely,

BARON & BUDD, P.C.

Steven M. Gruber
Steven M. Gruber

SMG:jjh
enc.

AGREED:

Laura Ellis Kugler
Laura Ellis Kugler, for
Georgia Pacific Corporation

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

GARY D. ELLISTON
DAVID W. CROWE
MEL D. BAILEY
W. SCOTT BERRY*

DEHAY & ELLISTON, L.L.P.

ATTORNEYS AND COUNSELORS
1500 MAXUS ENERGY TOWER
717 NORTH HARWOOD STREET
DALLAS, TEXAS 75201-6508
(214) 953-5454
FACSIMILE (214) 953-5455

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

MICHAEL L. ATCHLEY
STUART G. BROOKS
KELLY C. CAPERTON
RANDAL G. CASHIOLA
PAUL E. HAMILTON
BRENT M. KARREN
LAURA E. KUGLER
CHRISTOPHER P. MANNING
AMY E. MCKINNEY
ANTHONY S. MILLER
TODD D. OGDEN
SIDNEY T. SMITH
ERIC D. WEWERS

*OF COUNSEL

WRITER'S DIRECT DIAL
(214) 953-5418

February 1, 1996

VIA FEDERAL

David J. Garcia
District Clerk
Bexar County Courthouse
100 Dolorosa St.
San Antonio, TX 78205

Re: In Re: All Asbestos Litigation
No. 94CI-10078

Dear Clerk:

Enclosed please find the original and one copy of Defendant Georgia-Pacific Corporation's Response to Plaintiffs' First Request for Admissions in connection with the above-referenced matter. Please file the original and return a file-stamped copy to our office in the envelope provided.

Thank you for your assistance in this matter.

Very truly yours,

Laura E. Kugler
Laura E. Kugler

LEK/dkm
Enclosures
cc: Mr. Steve Gruber (VIA FACSIMILE)

AL,
Here is a copy of
GP's RFA responses
re: post 177 sales
of asbestos
- joint compound.

- Shall I get agree-
ments that this will
apply in all jurisdictions
or submit a

new
RFA?

SG.

Steve,
Get an agreement
that it will apply in
all jurisdictions.
THX
ams

NO. 94CI-100

IN RE: ASBESTOS LITIGATION

§ IN THE DISTRICT COURT OF
§
§ 285TH JUDICIAL DISTRICT
§
§ BEXAR COUNTY, TEXAS

DEFENDANT GEORGIA-PACIFIC CORPORATION'S RESPONSE
TO PLAINTIFFS' FIRST SET OF REQUEST FOR ADMISSIONS

TO: Plaintiffs, by and through their attorney of record, Mr.
Steve Gruber, Baron & Budd, 3102 Oak Lawn Avenue,
Suite 1100, Dallas, Texas 75219.

COMES NOW, Georgia-Pacific Corporation, a Defendant in the
above-styled and numbered cause and files this its Response to
Plaintiffs' First Set of Request for Admissions pursuant to Rule
169 of the Texas Rules of Civil Procedure.

Respectfully submitted,

DEHAY & ELLISTON, L.L.P.
717 North Harwood
Suite 1500
Dallas, Texas 75201
(214) 953-5454 (TELEPHONE)
(214) 953-5455 (TELECOPIER)

By: Mel D. Bailey
MEL D. BAILEY
State Bar No. 01532100 *JEK*

COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing document
has been forwarded to counsel of record for Plaintiffs herein, on
this 1st day of February, 1996.

Mel D. Bailey
MEL D. BAILEY *JEK*

RESPONSE TO PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that Georgia-Pacific Corporation sold asbestos-containing joint treatment products after December 12, 1977.

RESPONSE:

Georgia Pacific is unable to admit or deny this request as written. Georgia Pacific ceased the manufacture of all asbestos containing products in 1977. Georgia Pacific has been unable to locate any witnesses who recall sales of asbestos containing joint treatment products after December 12, 1977. Furthermore, Georgia Pacific is not currently specifically aware of documents that indicate that it sold asbestos containing joint treatment products after December 12, 1977.