PLAINTIFF'S EXHIBIT

KG-182

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

IN RE ALL KING COUNTY ASBESTOS CASES OF BERGMAN & PAGELER

No. 89-2-18455-9 SEA

PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT KAISER GYPSUM COMPANY, INC. **AND ANSWERS AND RESPONSES THERETO**

TO: KAISER GYPSUM COMPANY, INC.

AND: KENNETH PETTY, WILLIAMS KASTNER & GIBBS, Counsel for Defendant KAISER GYPSUM COMPANY, INC.

YOU ARE HEREBY SERVED with Plaintiffs' First Set of Interrogatories and Requests for Production of Documents propounded to Defendant KAISER GYPSUM COMPANY, INC. These interrogatories must be answered, under oath, within thirty (30) days of service pursuant to CR 33(a) and the General Style Order governing asbestos litigation in this jurisdiction. Please type the answers in the space provided, adding additional pages if necessary. Return the original to the office of Plaintiffs' attorney, Bergman & Pageler, 1201 Third Avenue, Suite 5300, Seattle, Washington 98101.

GENERAL OBJECTION

Kaiser Gypsum Company, Inc. (hereinafter "Kaiser Gypsum") objects to these interrogatories and requests for production on the grounds that they are compound, incomplete, illegible, vague, ambiguous, overbroad as to time, scope, products and location, and seek information that is not relevant to the issues in this lawsuit, and otherwise not reasonably calculated to lead to the discovery of admissible evidence.

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Without waiving the above objections, Kaiser Gypsum responds as follows: responsive answers for Washington area facilities and the products referenced have been provided. Kaiser Gypsum also objects to plaintiffs' characterization to these interrogatories and requests as continuing as beyond this purview of the Civil Rules. Kaiser Gypsum agrees to supplement in accordance with the Civil Rules for the Superior Courts of the State of Washington.

Kaiser Gypsum continues its ongoing investigation to obtain information regarding the subject matter of these interrogatories and request for production and reserves the right to supplement these interrogatory responses and request for production responses as may be necessary, if and when, such further information becomes available.

INSTRUCTIONS

1. These discovery requests are to be regarded as continuing in nature, and you must supplement your responses promptly if you obtain additional or different material before trial in this action.

2. These discovery requests cover all documents and information within the possession, custody, or control of, or reasonably available to, the responding defendant and its predecessor, successor, parents, subsidiaries, officers, directors, employees, agents, consultants, servants, attorneys, assigns, or any other representatives.

3. If any response, or portion thereof, is withheld or objected to on the basis of a claim of privilege or for any other reason, identify, with enough particularity to support a motion to compel, the discovery request for which the response, or portion thereof, has been withheld or objected to, the information that has been withheld or objected to, the specific claim or privilege or other reason for withholding the information and the basis for your claim.

4. For each document produced in response to a discovery request, indicate on the document or in some other reasonable manner the number of the request(s) to which it responds.

5. If anything is deleted from a document produced in response to a discovery request, indicate the fact of deletion on the face of the document and state in your response to such request:

(A) the reason for the deletion; and
(B) the subject matter of the deletion.

6. If any document otherwise responsive to any request is withheld under claim of privilege, furnish a list containing for each such document the following information:

(A) the date of the document
(B) the name and title of its author(s);
(C) the name and title of each person to whom it was addressed;
(D) the name and title of each person to whom it was sent;
(E) the name and title of each person to whom it was disclosed in whole or in part;
(F) the number of pages;
(G) a brief description of its subject matter;

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(H) the request to which it is otherwise responsive; and
(I) the nature of the claimed privilege.

7. For any documents produced in response to a request that are not now within the defendant's possession, custody or control, state in such response in whose possession, custody or control such documents may be found. If a document responsive to a request no longer exists, identify it and explain the circumstances of its loss or destruction. If no documents exist that are responsive to a request, so state.

8. Discovery requests calling for numerical or chronological information shall be deemed, to the extent that the precise figures or dates are not known, to call for estimates. In each instance in which an estimate is given, identify it as such and specify the source of information and the basis for the estimate.

9. All discovery requests which are stated in the conjunctive are to be read as if also stated in the disjunctive, and vice versa (i.e., answer each request as if requiring an "and/or" response). Similarly, in all discovery requests, the singular form of a noun is to be read as including the plural form, and vice versa, and all verbs shall be construed to include all tenses.

10. Unless otherwise specified, the time period for each discovery request shall include the period from 1930 to present.

11. Pursuant to Rule 33(a), these Interrogatories are to be answered separately and fully in writing under oath, unless objected to, in which event the reasons for objection are to be stated in lieu of an answer in accordance with Instruction 3 above. The answers are to be signed by the person making them and the objections signed by the attorney making them.

12. Where an Interrogatory requests the identity of each person with responsibility over certain matters, the request shall be deemed to include each person, other than those with wholly clerical duties, who has responsibility over the matter. The request shall not be limited to the head of a department, division or branch, but shall include subordinate employees other than clerical staff who have responsibility over the matter.

13. Where an Interrogatory seeks identification of documents, the defendant may in lieu thereof attach a copy of the document(s) to its response to the Interrogatory pursuant to Rule 33(c) of the Civil Rules. For each document produced, indicate on the document or in some other reasonable manner the Interrogatory to which it responds.

14. If any Interrogatory cannot be answered fully, provide as complete an answer as possible, state the reason for the inability to provide a complete answer, and provide any information, knowledge or belief defendant has regarding the portion unanswered.

15. This discovery request requires production of drafts of documents covered by a request as well as all non-identical copies of the documents, e.g., they would require the production of a draft letter, the letter as sent and a copy of that letter on which there are additional markings or writings.

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DEFINITIONS

Unless otherwise defined herein, the following definitions apply to these discovery requests:

1. "You" means defendant KAISER GYPSUM COMPANY, INC., its officers, directors, employees, parent corporations, subsidiary corporations, affiliates, predecessors in interest, agents, consultants, contractors, attorneys, representatives, and all other persons acting or purporting to act on behalf of said defendant.

2. "Document" means any and all material that is written, printed, typed, photographed, recorded (whether electrically, electronically, magnetically, graphically, or otherwise) or which is capable of being recorded in any form. It includes, but is not limited to papers, books, records, letters, photographs, tangible things, correspondence, communications, telegrams, cables, Telex messages, memoranda, laboratory work papers, batch sheets, other work papers, ledger sheets, transcripts, minutes, reports, and recordings of telephone or other conversations or of interviews, conferences or other meetings, affidavits, statements, summaries, opinions, reports, studies, drafts, drafts of studies, analyses, bulletins, notices, announcements, advertisements, instructions, charts, manuals, brochures, publications, schedules, journals, statistical records, desk calendars, appointment books, diaries, lists, logs, well logs, field logs, tabulations, sound recordings, computer files, computer tapes, computer printouts, gas chromatograms, mass spectra, data processing in-put and out-put, microfilm, books of account, records, invoices, checks, notes, diagrams, maps, graphs, graphs or materials with handwriting or other printing on them, books, library reference, textbooks, treatises, and other tangible material.

3. "Relate to" or "relating to" means referring to, constituting, defining, concerning, containing, embodying, reflecting, identifying, stating, illustrating, dealing with, or in any way pertaining to.

4. "Identify" or "identity" means:

(A) with respect to a natural person, to provide the person's (i) full name, (ii) present or last known business and home addresses and phone numbers, (iii) present or last known employer and position with that employer; and (iv) employer and position at the time relevant to the interrogatory involved;

(B) with respect to an entity other than a natural person, to provide (i) the full name of the organization or entity; (ii) the present or last known address of the organization or entity, and (iii) the name, title and address of its chief executive officer;

(C) with respect to a document, to provide the document's (i) date; (ii) author and signatory; (iii) type (e.g., letter, memorandum); (iv) title and subject matter; (v) addressee and all other persons receiving copies; (vi) custodian; and (vii) its present or last known location;

(D) with respect to an act, action, or activity, to provide: (i) a description of the act or activity; (ii) the date it occurred; (iii) the place it occurred; (iv) the identity of each document relating to the act or activity; and (v) the identity of each person who participated or engaged in the act or activity;

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(E) with respect to a communication, to provide: (i) the date of the communication; (ii) the place it occurred; (iii) the identity of each person who originated, received, participated, or was present during the communication; (iv) the type of communication (e.g., letter, telegram, telephone conversation); (v) the identity of each document relating or referring to or comprising such communication; and (vi) the substance of the communication.

INTERROGATORIES and REQUESTS FOR PRODUCTION submitted this 1st day of March, 2001.

BERGMAN & PAGELER

Matthew P. Bergman, WSBA 20894
Meg Pageler, WSBA 28265
David S. Frockt, WSBA 28568
Counsel for Plaintiffs

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INTERROGATORIES

1. Do you admit that the document attached hereto as Exhibit 1 (Excerpts from the 09/20/66 Minutes of the Safety Committee Meeting at Buffalo, New York) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that appears to be incomplete, in that there is no reference to the adjournment or conclusion of the meeting, which precludes this defendant from determining the genuineness and authenticity of the document. Furthermore, the text "ABATE PRODUCTION MAY 1994" appears to have been added, which alters the document's legibility. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 1.

2. Do you admit that the document attached hereto as Exhibit 2 (Excerpts from the 09/19/67 Minutes of the Safety Committee Meeting at Saddle Brook, New Jersey) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that appears to be incomplete, in that there is no reference to the adjournment or conclusion of the meeting and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 2.

3. Do you admit that the document attached hereto as Exhibit 3 (Excerpts from the 03/19/68 to 03/20/68 Minutes of the Safety Committee Meeting at Sweetwater, Texas) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that the second page of the document is missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 3.

4. Do you admit that the document attached hereto as Exhibit 4 (Excerpts from the 10/25/71 Minutes of the Safety Committee Meeting in Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document.

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Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 4.

5. Do you admit that the document attached hereto as Exhibit 5 (Excerpts from the 10/27/71 to 10/28/71 Minutes of the Semiannual Meeting of the Gypsum Association at Irvington, Virginia) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 5.

6. Do you admit that the document attached hereto as Exhibit 6 (Excerpts from the 04/05/72 Minutes of the Annual Meeting of the Gypsum Association at Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Furthermore, the text "ABATE PRODUCTION May 1994" appears to have been added, which alters the document's legibility. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 6.

7. Do you admit that the document attached hereto as Exhibit 7 (Excerpts from the 02/14/73, 02/15/73 and 02/16/73 Minutes of the Nineteenth Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is illegible, which precludes this defendant from determining the genuineness and authenticity of the document. Furthermore, the plaintiff's exhibit stamps on page 1 and 12 do not match, which leads this defendant to believe that they are not the same document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 7.

8. Do you admit that the document attached hereto as Exhibit 8 (Excerpts from the 04/03/73 Minutes of the Manufacturing and Mining Committee at Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 8.

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9. Do you admit that the document attached hereto as Exhibit 9 (Excerpts from the 04/04/73 Minutes of the Annual Meeting of the Gypsum Association at Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 9.

10. Do you admit that the document attached hereto as Exhibit 10 (Excerpts from the 04/05/73 Minutes of the Board of Directors Meeting at Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that appears to be incomplete, in that there is no reference to the adjournment or conclusion of the meeting and the authentication stamp at the bottom of the page is cut off and illegible, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 10.

11. Do you admit that the document attached hereto as Exhibit 11 (Excerpts from the 08/01/73, 08/02/73 and 08/03/73 Minutes of the Ninety-First Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 11.

12. Do you admit that the document attached hereto as Exhibit 12 (Excerpts from the 09/19/73 Minutes of the Safety Committee Meeting at Cleveland, Ohio) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 12.

13. Do you admit that the document attached hereto as Exhibit 13 (Excerpts from the 10/10/73 to 10/12/73 Minutes of the Semiannual Meeting held at Hot Springs, Virginia) is genuine and authentic? If not, please state your grounds for such denial.

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RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, the authentication stamp at the bottom of the page is cut off and the deposition exhibit numbers are inconsistent, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 13.

14. Do you admit that the document attached hereto as Exhibit 14 (Excerpts from the 10/12/73 Minutes of the Board of Directors Meeting at Hot Springs, Virginia) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, page one and two are not related and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 14.

15. Do you admit that the document attached hereto as Exhibit 15 (November 1973 Report on Special Task Force on Joint Treatment Compound by Joesph Volk) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that the plaintiff's exhibit stamps are different, which leads this defendant to believe that they are not the same document, therefore precluding this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 15.

16. Do you admit that the document attached hereto as Exhibit 16 (11/19/73 Report titled "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds" issued to Gypsum Association, by Robert D. Soule, Industrial Hygiene Services at Denver, Colorado) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that it is illegible and there is no circulation list, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 16.

17. Do you admit that the document attached hereto as Exhibit 17 (12/07/73 Internal Correspondence from N.W. Hendry, Subject "Asbestos & Health Presentations" with attached Lists of Attendees to Asbestos & Health Presentations) is genuine and authentic? If not, please state your grounds for such denial.

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RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that it is not clear if the Internal Correspondence Memo is associated with the attached documents, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 17.

18. Do you admit that the document attached hereto as Exhibit 18 (Excerpts from the 02/13/74, 02/14/74 and 02/15/74 Minutes of the Ninety-Second Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 18.

19. Do you admit that the document attached hereto as Exhibit 19 (Excerpts from the 03/07/74 Minutes of the Safety Committee Meeting held at Dallas, Texas) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 19.

20. Do you admit that the document attached hereto as Exhibit 20 (Excerpts from the 04/09/74 Minutes from the Manufacturing and Mining Committee Meeting at Oak Brook, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 20.

21. Do you admit that the document attached hereto as Exhibit 21 (Excerpts from the 08/07/74, 08/08/74 and 08/09/74 Minutes of the Ninety-Third Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document.

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Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 21.

22. Do you admit that the document attached hereto as Exhibit 22 (Excerpts from the 08/14/74 Minutes of the Safety Committee Meeting at Huntington Beach, California) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that appears to be incomplete, in that there is no reference to the adjournment or conclusion of the meeting and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 22.

23. Do you admit that the document attached hereto as Exhibit 23 (Excerpts from the 10/08/74 Minutes of the Manufacturing and Mining Committee Meeting at Ojai, California) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 23.

24. Do you admit that the document attached hereto as Exhibit 24 (08/10/76 Minutes of the Special Meeting of the Manufacturing & Mining Committee at Buffalo, New York) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that page 2 is cut off and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 24.

25. Do you admit that the document attached hereto as Exhibit 25 (Excerpts from the 02/16/77 to 02/18/77 Minutes of the Ninety-Eighth Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 25.

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26. Do you admit that the document attached hereto as Exhibit 26 (Excerpts from the 04/06/77 Minutes of the Annual Meeting of the Gypsum Association, Chicago, Illinois) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 26.

27. Do you admit that the document attached hereto as Exhibit 27 (Excerpts from the 06/23/77 Minutes of the ASTM Committee C-11 on Ceilings and Walls at Ann Arbor, Michigan) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is cut off, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 27.

28. Do you admit that the document attached hereto as Exhibit 28 (Excerpts from the 08/10/77 to 08/12/77 Minutes of the Ninety-Ninth Meeting of the Technical Committee) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Furthermore, page 14 states "Reference was made to the Federal Register of August 15, 1977," which is impossible if Exhibit 28 are the minutes to a meeting that occurred August 10-12, 1977. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 28.

29. Do you admit that the document attached hereto as Exhibit 29 (Excerpts from the 10/12/77 to 10/13/77 Minutes of the Semiannual Meeting at White Sulphur Springs, West Virginia) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing, which precludes this defendant from determining the genuineness and authenticity of the document. Furthermore, this document makes reference to the updating of the 1978 Edition of the Fire Resistance Design Manual, yet, this document is represented to be the Minutes from a 10/12/77 and 10/13/77 meeting. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 29.

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30. Do you admit that the document attached hereto as Exhibit 30 (Excerpts from the 10/01/80 Minutes of the Manufacturing & Mining Committee Meeting at Phoenix, Arizona) is genuine and authentic? If not, please state your grounds for such denial.

RESPONSE: Objection, to the extent that this question seeks information regarding a document that is incomplete, in that several pages are missing and the authentication stamp at the bottom of the page is illegible, which precludes this defendant from determining the genuineness and authenticity of the document. Without waiving the above objection, this defendant will attempt to supplement this response, subject to the foregoing objection, if plaintiffs produce and identify the entire document referenced as Exhibit 30.

REQUESTS FOR PRODUCTION

1. Produce, for inspection and copying, all documents in your possession that refer or relate to the Gypsum Association and/or any of its committees or subcommittees.

RESPONSE: Objection to the extent that this question is overbroad in time and scope, vague, ambiguous and unduly burdensome. Without waiving the above objection, Kaiser Gypsum's non-sales documents are not broken down by the category described. Kaiser Gypsum, however, will make its non-sales documents available at its record depository for inspection at a mutually convenient time.

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VERIFICATION

I, JOSEPH R. HOBBY, am an authorized representative of KAISER GYPSUM COMPANY, INC. and am authorized to make this affidavit on its behalf. I have read the foregoing answers and responses to plaintiffs' First Set of Interrogatories and Requests for Production of Documents and believe the answers and responses to be correct.

By _____
JOSEPH R. HOBBY

SUBSCRIBED AND SWORN TO before me on the 10th day of May 2001.

Margaret H. Hudson
Notary Public in and for the State of California
residing at Contra Costa County
My commission expires: 8-22-01

Margaret H. Hudson
Comm. #1151420
NOTARY PUBLIC - CALIFORNIA
CONTRA COSTA COUNTY
Comm. Exp. Aug. 22, 2001

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