

PLAINTIFF'S
EXHIBIT

GTR-19

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Attorneys for Defendant, THE GOODYEAR TIRE & RUBBER COMPANY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

IN RE: COMPLEX ASBESTOS) No. 828684
LITIGATION.) AMENDED
) RESPONSE TO PLAINTIFFS'
) STANDARD INTERROGATORIES TO
) ALL DEFENDANTS

PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: Defendant, The Goodyear Tire & Rubber
Company

SET NUMBER: One

Defendant The Goodyear Tire & Rubber Company hereby responds
to plaintiffs' standard general order no. 129 interrogatories as
follows:

PREAMBLE

1. Defendant's responses are based upon information
presently available. At present, defendant has not yet completed
its discovery, its investigation, or its preparation for trial, any
of which may yield further information which might be responsive to
this discovery request.

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1 2. Defendant objects to any discovery requests which call
2 for the disclosure of attorney work product, or communications
3 within the attorney-client privilege.

4 3. As to all responses to these interrogatories, The
5 Goodyear Tire & Rubber Company has undertaken an extensive search,
6 commencing in the mid-1980's, for documents and information
7 responsive to these discovery requests. The search was conducted by
8 a host of attorneys, paralegals, and other personnel. Further, the
9 aircraft brake, industrial brake, and asbestos gasket business
10 units have been sold to other entities. Documents and information
11 responsive to the present interrogatories were transferred along
12 with those business units. Any responses below to which Goodyear
13 cannot provide an answer, were made in good faith, based upon a
14 lack of obtainable information.

15 Dated: September 5, 1997.

16 **HARDY ERICH BROWN & WILSON**
17 A Professional Corporation

18 By: Brian H. Charter
19 BRIAN H. CHARTER
20 State Bar No. 127995

21 **RESPONSES TO GENERAL ORDER NO. 29 INTERROGATORIES**

22 RESPONSE TO INTERROGATORY NO.1: :

23 James Boyazis, Vice-President, Secretary of The Goodyear Tire
24 & Rubber Company.

25 RESPONSE TO INTERROGATORY NO.2:

26 Mr. James Boyazis served in various posts throughout Goodyear
27 and its subsidiaries from 1983 to January 1, 1986, when he joined
28 the Goodyear legal department. On June 2, 1987, Mr. Boyazis became

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1 the Vice President and Secretary of Goodyear, and remains in that
2 position to date.

3 RESPONSE TO INTERROGATORY NO. 3:

4 Yes.

5 a. The Goodyear Tire & Rubber Company;

6 b. Ohio

7 c. August 2, 1898;

8 d. 1144 East Market Street, Akron, Ohio 44316.

9 e. Goodyear is certified to do business in California, however
10 the effective dates are unknown.

11 f. Wholly owned

12 g. Goodyear's registered agent in California is CT Corporation
13 System, 818 W. Seventh Street, Los Angeles, CA 90017.

14 RESPONSE TO INTERROGATORY NO. 4:

15 No.

16 RESPONSE TO INTERROGATORY NO. 5:

17 Not Applicable.

18 RESPONSE TO INTERROGATORY NO. 6:

19 Not Applicable.

20 RESPONSE TO INTERROGATORY NO. 7:

21 Not Applicable.

22 RESPONSE TO INTERROGATORY NO. 8:

23 Not Applicable.

24 RESPONSE TO INTERROGATORY NO. 9:

25 See Response to Interrogatory No. 1 and Paragraph 4 of the
26 preamble.

27 RESPONSE TO INTERROGATORY NO. 10:

28 a. - c. Goodyear can identify no such person.

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1 RESPONSE TO INTERROGATORY NO. 11:

2 Industrial Hygienists: Arthur Kelson, Robert Manning, H.W.
3 McInerney, R.W. Modrell, J.L. Holtshouser. Medical Directors: H.
4 Conn, M.D., P.A. Davis, M.D., L.C. Hatch, C.A. Johnson, M.D.

5 RESPONSE TO INTERROGATORY NO. 12:

6 It is known that Goodyear employees have testified in other
7 asbestos cases. Goodyear, however, has no record of who nor
8 knowledge of the particulars except as follows:

9 William E. Barr, Normal Dallas, Joseph Holtshouser, John
10 Tancous. All in Asbestos IV 95-C-8888, in the Circuit Court
of Kanawha County, W.V.

11 C.A. Johnson (Cunningham V. Goodyear, Civil Action No. 91-
12 0097C in the U.S. District Court for the Western District of
New York.

13 DiCarlo v. Goodyear, 96 A.C.M. - 2 Civil No. 95-1471-04 in the
14 Circuit Court of the State of Hawaii.

15 Heinrich v. Goodyear, Case No. M 80-1956 in the U.S. District
Court for the District of Maryland.

16 Schiro V. Goodyear, Civil Action No. CA3-85-0389-T in the U.S.
17 District Court for the Northern District of Texas (Dallas
Division).

18 Transcripts available upon request and at plaintiff's cost.

19 RESPONSE TO INTERROGATORY NO. 13:

- 20 a. No.
21 b. Yes (1925-1976).
22 c. No.
23 d. No.
24 e. No.
25 f. No.
26 g. No.
27 h. No.
28 i. Yes (1964 to 1974).

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- 1 j. - No.
2 k. No.
3 l. No.
4 m. No.
5 n. No.
6 o. Yes (1954 to present).
7 p. No.
8 q. No.
9 r. No.
10 s. No.
11 t. No.
12 u. No.
13 v. Not Applicable.
14 w. Not Applicable.

15 RESPONSE TO INTERROGATORY NO. 14:

- 16 a. See Above.
17 b. Unknown.
18 c. Unknown.

19 RESPONSE TO INTERROGATORY NO. 15:

20 No.

21 RESPONSE TO INTERROGATORY NO. 16:

22 No.

23 RESPONSE TO INTERROGATORY NO. 17:

24 No.

25 RESPONSE TO INTERROGATORY NO. 18:

26 Yes. The Journal of Occupational Medicine, with subscriptions
27 going back to 1947.

28 a. 1947.

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1 b. Goodyear's Corporate Industrial Hygiene Department at
2 Goodyear's principal office and place of business.

3 c. J. L. Holtshouser.

4 RESPONSE TO INTERROGATORY NO. 19:

5 Yes, but only with attorneys for this defendant.

6 RESPONSE TO INTERROGATORY NO. 20:

7 No.

8 RESPONSE TO INTERROGATORY NO. 21:

9 Yes. In 1972, OSHA issued regulations relating to asbestos.
10 Thereafter, Goodyear conducted air monitoring tests at facilities
11 using asbestos fibers in production (Plant 2, Akron, Ohio and
12 Ashland, Ohio) and implemented a mandatory medical surveillance
13 program as required by such regulations. Goodyear objects to
14 responding further to this interrogatory on the basis it seeks
15 cumulative information inasmuch as Goodyear has identified products
16 it manufactured which contained asbestos and it calls for
17 information not calculated to lead to admissible evidence against
18 this defendant at time of trial.

19 RESPONSE TO INTERROGATORY NO. 22:

20 No.

21 RESPONSE TO INTERROGATORY NO. 23:

22 No.

23 RESPONSE TO INTERROGATORY NO. 24:

24 Yes. See Response to Interrogatory No. 21.

25 RESPONSE TO INTERROGATORY NO. 25:

26 Yes, workers' compensation claims instigated by the union were
27 brought by employees of all rubber companies in the Akron, Ohio
28 area and over 300 such claims were filed by Goodyear employees, but

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1 there were less than a dozen instances in which the Industrial
2 Commission of Ohio found such claims to be valid and granted an
3 award.

4 The first claim which can be documented was brought by Charles
5 A. Love on May 9, 1985.

6 Goodyear objects to further responding to this discovery on
7 the basis it is overburdensome, not calculated to lead evidence
8 admissible at trial, and that this information is equally available
9 to plaintiff.

10 RESPONSE TO INTERROGATORY NO. 26:

11 Yes. Goodyear entered into contracts with various insurers to
12 cover both this company and all its subsidiaries effective the
13 dates shown below.

14 Hartford Accident & Indemnity Company, 7/1/40 - 1/1/49;

15 Liberty Mutual Insurance Company, 1/1/49 - 1/1/53;

16 Continental Casualty Company, 1/1/53 - 1/1/61;

17 The Aetna Casualty and Surety Company, 1/1/61 - 1/1/71;

18 The Travelers Indemnity Company, 1/1/71 - 1/1/77.

19 The above-listed insurers provided general liability coverage with
20 limits of \$300,000 per person, \$1,000,000 per occurrence for bodily
21 injury. Since January 1, 1977, Goodyear has been self-insured for
22 primary limits.

23 RESPONSE TO INTERROGATORY NO. 27:

24 The Goodyear Tire and Rubber Company acquired or started the
25 following entities:

26 a. - c. Goodyear Aerospace Corporation, 1210 Massillon Road,
27 Akron, Ohio, a manufacturer and seller of aircraft brakes

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1 containing asbestos components from 1974 to 1984 and industrial
2 brakes with asbestos brake linings from 1979 to 1984.

3 Goodyear Canada, Inc., 10 Four Seasons Place, Etobicoke,
4 Ontario M9B 6G2, a manufacturer and seller of asbestos gasket
5 material from 1970 to 1973.

6 Motor Wheel Corporation, with principal offices at 1600 Larch
7 Street, and subsequently 4000 Collins Road, Lansing, Michigan, a
8 manufacturer and seller of electric brakes for trailers and mobile
9 homes which contained asbestos brake linings from 1964 to 1969.

10 Goodyear Aerospace Corporation was incorporated in the State
11 of Ohio on December 5, 1939. Goodyear Canada, Inc., was
12 incorporated in Ontario, Canada on March 30, 1927. Motor Wheel
13 Corporation was incorporated in Michigan, date unknown.

14 RESPONSE TO INTERROGATORY NO. 28:

- 15 a. No.
16 b. No.
17 c. No.
18 d. Yes, from 1914 - 1981.
19 e. Yes, from 1914 - 1981.
20 f. No.
21 g. No.
22 h. No.
23 i. No.

24 RESPONSE TO INTERROGATORY NO. 29:

- 25 a. Unknown
26 b. Not Applicable.
27 c. Not Applicable.
28 d. See Answer to Interrogatory No. 31 below.

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- 1 e. Unknown.
2 f. See Answer to Interrogatory No. 31 below.
3 g. Unknown.
4 h. Not Applicable.
5 i. Not Applicable.

6 RESPONSE TO INTERROGATORY NO. 30:

- 7 a. Yes, from 1914 - 1981.
8 b. No.
9 c. Yes, from 1914 - 1981.
10 d. Yes, from 1914 - 1981.
11 e. Yes, from 1914 - 1981.
12 f. Yes, from 1914 - 1981.
13 g. Yes, from 1914 - 1981.
14 h. No.

15 RESPONSE TO INTERROGATORY NO. 31:

16 a. Asbestos gasket material known as "Goodyearite" or sold
17 to Durabla Manufacturing Co.

18 b. This material was first offered for sale in 1914; after
19 reasonable inquiry, Goodyear is unable to provide test or
20 experimental marketing dates.

21 c. If Goodyear marketed this material in the relevant
22 geographical area, it ceased marketing this material in 1969.

23 d. Approximately 80 percent chrysotile asbestos and
24 20 percent rubber compound.

25 e. Appearance of shiny gray, black, or white cardboard.
26 Produced in sheets 1/64 to 1/4 inch thick and approximately
27 120 inches by 150 inches.

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1 f. Fabrication of gaskets in applications requiring
2 resistance to heat. The product was designed to be used in
3 temperatures up to 400 degrees Fahrenheit.

4 g. No.

5 h. Goodyear is able to identify only the following asbestos
6 suppliers: Lake Asbestos of Quebec, Ltd., P.O. Box 88, Black Lake,
7 Quebec; Asbestos Corporation, Ltd., 1940 Sun Life Building, 1155
8 Metcalfe Street, Montreal, Quebec H5B 2x6; Johns-Manville Canada,
9 Inc., 295 The West Mall, Etobicoke, Ontario M96 427; Bell Asbestos
10 Mines, Inc., P.O. Box 99, Thetford Mines, Quebec G6G 5S4.

11 i. Asbestos gasket material was sold directly to the gasket
12 manufacturer. No sales of asbestos gasket material are known to
13 have been made to any gasket supplier or distributor, or any other
14 entity within the geographical scope of these interrogatories.

15 j. Unknown.

16 -----
17 a. Furnace door hose, sometimes referred to as asbestos-covered
18 water hose.

19 b. This material was first offered for sale in 1959; after
20 reasonable inquiry, Goodyear is unable to provide test or
21 experimental marketing dates.

22 c. If Goodyear marketed this material in the relevant
23 geographical area, it ceased marketing this material on May 24,
24 1976.

25 d. Ply of woven fabric of asbestos and cotton, not
26 manufactured by Goodyear and specific asbestos content unknown.
27 The fabric was imbedded as a part of the outer layer and at maximum
28 accounted for approximately 10 percent of the product weight.

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1 Various specifications at the same time, subject to minor changes
2 until use of asbestos discontinued in 1976 and number of plies
3 varied anywhere from one to four. The bulk of the product was
4 rubber compound.

5 e. This hose was grey in appearance. Literature on a
6 subsequent hose without asbestos content with a similar exterior
7 appearance is produced. See literature.

8 f. The hose was produced for a special application to
9 supplement the line of industrial hose offered by Goodyear. The
10 intended use of the product is indicated by the name and
11 description. Generally speaking, asbestos is used in a product to
12 resist exposure to friction or heat. The ply of woven fabric of
13 asbestos and cotton served as a heat shield allowing use of the
14 hose in applications where it would be subjected to external heat.

15 g. No.

16 h. Information and belief is the fabric was supplied by
17 Raybestos-Manhattan, 205 Middle St., Bridgeport, Conn. 06603.

18 i. Asbestos-containing hoses were sold through distributors,
19 of an unknown identity, and directly from Goodyear upon occasion.
20 The hose product would have been sold to distributors within the
21 geographical scope of these interrogatories, but the identities of
22 such other entities are unknown.

23 j. Unknown.

24 -----

25 a. Steam hose, including pile driver hose.

26 b. This material was first offered for sale in 1931; after
27 reasonable inquiry, Goodyear is unable to provide test or
28 experimental marketing dates.

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1 If Goodyear marketed this material in the relevant
2 geographical area, it ceased marketing this material on August 24,
3 1970.

4 d. Braided 9 cut 2 ply of yarn made of asbestos and rayon.
5 The ply accounted for approximately 3.78% of the product by weight,
6 3.156 lbs. of a total weight of 83.448 lbs. in 100 feet of hose.
7 The braided asbestos ply which was Commercial Raybestos-Manhattan
8 920 was encapsulated under a rubber compound outer layer. The bulk
9 of the hose was rubber compound.

10 e. The hose was produced for a special application to
11 supplement the line of industrial hose offered by Goodyear.
12 Goodyear hose was ordinarily marked Goodyear with Goodyear's winged
13 foot logo. Some such products may also have had the trademark
14 Flexsteel.

15 f. Use of the product is indicated by its name and
16 description. The ply served as a heat resistant wick. Steam hose
17 was designed to be used in temperatures up to 400 degrees
18 fahrenheit.

19 g. No.

20 h. Raybestos-Manhattan.

21 i. Asbestos-containing hoses were sold through distributors,
22 of an unknown identity, and directly from Goodyear upon occasion.
23 The hose product would have been sold to distributors within the
24 geographical scope of these interrogatories, but the identities of
25 other such entities are unknown.

26 j. Unknown.

27 -----
28 a. Conveyor belt with asbestos burn shield.

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1 b. This product was first marketed before 1962; after
2 reasonable inquiry, Goodyear is unable to provide test or
3 experimental marketing dates.

4 c. If Goodyear marketed this material in the relevant
5 geographical area, it ceased marketing this material in 1962.

6 d. The burn shield was manufactured for Goodyear by others
7 and we are unable to determine the asbestos content. The burn
8 shield is estimated to have accounted for approximately 5% of the
9 product's weight. Specifications for the product have neither been
10 identified nor found.

11 e. See a. Goodyear belting was marked with Goodyear's winged
12 foot logo.

13 f. Used as a conveyor belt on conveyor systems in
14 applications requiring the belt carry hot materials or otherwise
15 resist friction and heat.

16 g. No.

17 h. Information and belief is the burn shield supplier was
18 Raybestos-Manhattan, Inc.

19 i. Asbestos-containing conveyor belting was sold through
20 distributors, of an unknown identity, and directly from Goodyear
21 upon occasion. The product would have been sold to distributors
22 within the geographical scope of these interrogatories, but the
23 identities of other such entities are unknown.

24 j. Unknown.

25 -----

26 a. Plio-Nail.

27 b. About 1970; after reasonable inquiry, Goodyear is unable
28 to provide test or experimental marketing dates.

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1 contained 50-76% asbestos in the same type of compound. There were
2 a number of different formulae at any one time and over the years.

3 e. See a. Asbestos-containing aircraft and industrial brake
4 parts were shiny dark brown in color and had an appearance similar
5 to molded bakelite. They were marked only with an ink stamped part
6 number.

7 f. Installation and replacement of brake linings on
8 aircraft.

9 g. No.

10 h. See "brake linings". Insulators were purchased from a
11 great variety of producers over the years during which asbestos was
12 in general use.

13 i. Original brake components were sold directly to aircraft
14 manufacturers by Goodyear. Replacement brake components were sold
15 to the military and to airlines by distributors. Goodyear is
16 unable to identify sales or distributors within the geographical
17 scope of this interrogatory.

18 j. Unknown.

19 -----
20 a. Industrial brakes for off-the-road hauler trucks,
21 loaders, shuttle cars, foundry transfer cars, lifters, mining cars
22 and industrial equipment, etc., i.e., non-over-the-road vehicles
23 and equipment. However, note that not all types of industrial
24 brakes sold by Goodyear contained asbestos.

25 b. 1948; after reasonable inquiry, Goodyear is unable to
26 provide test or experimental marketing dates.

27 c. If Goodyear marketed this material in the relevant
28 geographical area, it ceased marketing this material in 1979.

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1 automotive brake linings used in this service contain chrysotile,
2 however, is currently unaware of the exact contents of said brake
3 linings. Discovery continues.

4 d. Goodyear has never been the manufacturer of these brake
5 linings and cannot answer this interrogatory.

6 e. The product is self-descriptive by identification.

7 f. Brake linings were and are used as a part of an
8 automobile brake service at Goodyear-operated retail tire and
9 service stores throughout the United States.

10 g. No.

11 h. Prior to 1983, Goodyear purchased such automobile brake
12 linings centrally, directly from suppliers, primarily Raybestos and
13 Wagner. Since then, individual company stores operated by Goodyear
14 place their orders directly with the closest member of AAAD, which
15 distributes and supplies brake linings for virtually all domestic
16 brake manufacturers. Currently, the primary brands purchased are
17 the following:

18 Wagner Brake, Cooper Industries, 930 Roosevelt Parkway,
19 Chesterfield, MO 63701;

20 Raybestos Brand, 11045 Gage Avenue, Franklin Park, IL 60131;

21 EIS Brake Division, Standard Motor Parts, 129 Worthington
22 Ridge, Berlin, CT 06037;

23 Trust Brand, AAAD, White Station Tower, Suite 2020, 5050
24 Poplar Avenue, Memphis, TN 38157;

25 Bendix Brand, Allied Automotive, 105 Pawtucket Avenue, East
26 Providence, RI 01916.

27 i. Unknown.

28 j. Unknown.

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- 1 -----
- 2 a. Floor tile.
- 3 b. Heavy duty homogenous (HDH) - pre-1954 to 1975.
- 4 c. (1) See above. (2) Not Applicable.
- 5 d. 5% asbestos, 95% vinyl.
- 6 e. 9 x 9; 12 x 12; 6 foot rolls; many colors and styles, but
- 7 usually mottled. Inscribed with the Goodyear Winged Foot logo.
- 8 f. Flooring.
- 9 g. No.
- 10 h. Lakes Asbestos of Quebec, Ltd. Asbestos Corp., Ltd.
- 11 John-Manville Canada.
- 12 i. Unknown.
- 13 j. Unknown.

14 RESPONSE TO INTERROGATORY NO. 32:

15 Not Applicable.

16 RESPONSE TO INTERROGATORY NO. 33:

17 Not Applicable.

18 RESPONSE TO INTERROGATORY NO. 34:

19 Yes. Goodyear entered into an exclusive distributor agreement

20 with WJ Rusco Company, Akron, OH, under which the latter repackaged

21 and distributed Plio-Nail adhesives, and other adhesives, for

22 Goodyear, from 1970 through 1981. As to other product lines,

23 unknown.

24 RESPONSE TO INTERROGATORY NO. 35:

25 Yes. Goodyear entered into an exclusive distributor agreement

26 with WJ Rusco Company, Akron, OH, under which the latter repackaged

27 and distributed Plio-Nail adhesives, and other adhesives, for

28 Goodyear, from 1970 through 1981.

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1 Goodyear entered into a non-disclosure agreement with Durabla
2 Manufacturing Company, of Lionville, PA, under which Goodyear
3 received proprietary specifications from Durabla for the
4 manufacture of asbestos gasket material under the Durabla brand for
5 supply to Durabla exclusively from the 1913 through 1969.

6 RESPONSE TO INTERROGATORY NO. 36:

7 For the ten year period from approximately 1965 to 1975,
8 Goodyear placed purchase orders with manufacturers for automotive
9 brake linings in boxes bearing the Goodyear brand. The brake
10 linings were distributed to Goodyear company retail tire and
11 automobile service stores for brake replacement. These brake
12 linings were likewise available to independent dealers who were
13 authorized under contract to purchase Goodyear tires and other
14 Goodyear branded products for their use in replacing customer brake
15 linings.

16 RESPONSE TO INTERROGATORY NO. 37:

17 No.

18 RESPONSE TO INTERROGATORY NO. 38:

19 Yes, See Answer to Interrogatory No. 31.

20 RESPONSE TO INTERROGATORY NO. 39:

21 See Response to Interrogatory No. 27.

22 RESPONSE TO INTERROGATORY NO. 40:

23 See Responses to Interrogatories Nos. 34, and 35.

24 RESPONSE TO INTERROGATORY NO. 41:

25 See attached documents.

26 RESPONSE TO INTERROGATORY NO. 42:

27 No.

28 RESPONSE TO INTERROGATORY NO. 43:

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1 ~~Not~~ Applicable.

2 RESPONSE TO INTERROGATORY NO. 44:

3 This defendant objects on the grounds that this Interrogatory
4 requests privileged information. Without waving said objection,
5 this defendant responds that it has been aware of medical opinion
6 connecting asbestos exposure to disease in human beings for an
7 unknown period of time. This defendant has not such direct
8 "knowledge."

9 RESPONSE TO INTERROGATORY NO. 45:

10 See response to Interrogatory no. 44, above.

11 RESPONSE TO INTERROGATORY NO. 46:

12 This defendant objects to this interrogatory on the basis that
13 its seeks privileged information, and that it is overburdensome.
14 Without waiving said objections, this defendant responds: it is not
15 known that such documents exist. Furthermore, if such documents
16 were to exist, their location is unknown to this defendant.

17 RESPONSE TO INTERROGATORY NO. 47:

18 This defendant objects to this interrogatory on the basis that
19 it seeks privileged information. Without waiving said objection,
20 this defendants responds: unknown, discovery continuing.

21 RESPONSE TO INTERROGATORY NO. 48:

22 See response to interrogatory no. 47.

23 RESPONSE TO INTERROGATORY NO. 49:

24 See response to interrogatory no. 47.

25 RESPONSE TO INTERROGATORY NO. 50:

26 No.

27 RESPONSE TO INTERROGATORY NO. 51:

28 No.

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1 RESPONSE TO INTERROGATORY NO. 52:

2 No.

3 RESPONSE TO INTERROGATORY NO. 53:

4 This defendant objects to this interrogatory on the grounds
5 that it seeks privileged information, and that it is
6 overburdensome. Without waiving said objection, this defendant
7 responds: See response to interrogatory no. 31.

8

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1 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO
2 In Re: Complex Asbestos Litigation, Case No. 828684

3 PROOF OF SERVICE

4 CODE OF CIVIL PROCEDURE
5 SECTIONS 1013, SUBDIVISION (a) AND 2015.5

6 I am a citizen of the United States and am employed in the
7 County of Sacramento. I am over the age of 18 years and not a
8 party to the within cause; my business address is 1000 G Street,
9 Sacramento, California 95814.

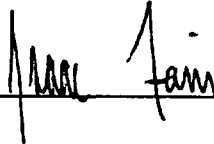
10 On September 5, 1997, I personally served Amended Response to
11 Plaintiffs' Standard Interrogatories to all Defendants on the
12 following parties in this cause, as follows:

13 Alan R. Brayton
14 Anne M. Braudis
15 Brayton Harley Curtis
16 222 Rush Landing Road
17 Novato, CA

18 Harry F. Wartnick
19 Wartnick, Chaber, Harowitz,
20 Smith & Tigerman
21 101 California Street, #2200
22 San Francisco, CA 94111

23 I declare under penalty of perjury under the laws of the State
24 of California that the foregoing is true and correct and that this
25 declaration was executed on September 5, 1997, at Sacramento,
26 California.

27 Isaac Faris

28 

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RICH
COWN
&
WILSON

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Sacramento, CA 95814
phone 916 449-3800
fax 916 449-3888

1 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO
2 In Re: Complex Asbestos Litigation, Case No. 828684

3 PROOF OF SERVICE

4 CODE OF CIVIL PROCEDURE
5 SECTIONS 1013, SUBDIVISION (a) AND 2015.5

6 I am a citizen of the United States and am employed in the
7 County of Sacramento. I am over the age of 18 years and not a
8 party to the within cause; my business address is 1000 G Street,
9 Sacramento, California 95814.

10 I am familiar with the business practice at my place of
11 business for collection and processing of documents for mailing
12 with the United States Postal Service. Documents so collected and
13 processed, with postage fully prepaid, will be deposited with the
14 United States Postal Service that same day in the ordinary course
15 of business.

16 On September 5, 1997, I served the within Amended Response to
17 Plaintiffs' Standard Interrogatories to All Defendants* on the
18 parties in this cause, by placing for collection, process and
19 deposit a true copy thereof enclosed in a sealed envelope by:

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IN RE: COMPLEX ASBESTOS LITIGATION

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39		Bowles & Verna
40	Bennett, Samuelsen, et al.	P. O. Box 8180
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| 24 | 44 Montgomery Street, Ste. 400 | 1801 Century Park East, 9th Fl. |
| 25 | San Francisco, CA 94104 | Los Angeles, CA 90067 |
| 26 | Caswell, Bell, et al. | David H. Tennant & Associates |
| 27 | P. O. Box 5259 | 11211 Gold Country Blvd., Ste. 105 |
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| 29 | Charles E. Harris | Davidovitz & Yaron |
| 30 | 234 W. Napa Street | 111 Pine Street, 12th Fl. |
| 31 | Sonoma, CA 95476 | San Francisco, CA 94111-5614 |
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| 9 | San Francisco, CA 94104 | San Diego, CA 92101 |
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- 16 Hanna, Brophy, et al.
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- 17 San Francisco, CA 94104
- 18 Hardin, Cook, et al.
1999 Harrison Street, 18th Fl.
- 19 Oakland, CA 94612-3131
- 20 Harrington, Foxx, et al.
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- 21 San Francisco, CA 94111
- 22 Harrington, Foxx, et al.
611 W. Sixth Street, 30th Fl.
- 23 Los Angeles, CA 90071
- 24 Hassard Bonnington
2 Embarcadero Center, Ste. 1800
- 25 San Francisco, CA 94111-3993
- 26 Heller, Ehrman, et al.
333 Bush Street
- 27 San Francisco, CA 94104-2878
- 28

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- Imai, Tadlock & Keeney
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- Irell & Manella, LLP
1800 Avenue of the Stars, Ste. 900
Los Angeles, CA 90067-4276
- Jackson & Wallace
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- Jackson, Tufts, et al.
650 California Street
San Francisco, CA 94108
- Jacobs Associates
201 Spear Street, 16th Fl.
San Francisco, CA 94105
- Jaffe, Trutanich, et al.
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- Janssen, Malloy, et al.
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