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GP Ans to Interr Laing v. GP 10/02/87

Topping Compound:

A. 1956.

B. 1956 to present.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Acme, Texas, Chicago, Illinois, Akron, New York and Marietta, Georgia.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Triple Duty Joint Compound:

A. Approximately 1965.

B. Approximately 1965 to present.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Acme, Texas, Akron, New York, Marietta, Georgia and Chicago, Illinois.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

13. Please state the following for each asbestos-containing product mined, manufactured, sold, marketed

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and/or distributed by Defendant, Defendant's predecessors, and Defendant's subsidiaries at any time since 1930:

A. Its generic name;

B. Its trade or brand name;

C. Any common, popular or slang names by which the product was referred;

D. Its chemical composition (include the specific asbestos fiber type(s) - e.g., amosite, chrysotile, or crocidolite - and percentage by weight of each asbestos fiber type contained in the product, as well as the identity and percentage by weight of all other ingredients of the product);

E. The intended use of the product, including the temperature ranges for which the product was recommended;

F. The form in which the product was shopped (i.e., burlap bags, paper bags, drums, cardboard boxes, wooden crates, etc.), including the size of the container;

G. The name of the company mining, manufacturing, marketing and/or selling said product, if not the Defendant;

H. A detailed description of the intended method of preparation and application of the product;

I. A description of the physical appearance of the product, including color and texture;

J. A description of any logos, writing, impressions or identifying markings which appeared on the

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product, as well as describing the package used, the date that type of package was used, and any writings, trademarks, etc. which appeared on the package;

K. Identify each individual who participated in the design, preparation and approval of the company manufacturing and/or marketing specifications for the product;

L. Whether the product has been altered in chemical composition since first being made. If so, please state as to each such alteration:

(1) The date of alteration

(2) The name of the alteration;

(3) The reason for the alteration;

(4) Identify the person recommending or approving such alteration;

(5) Whether there were any studies, evaluations or tests made in connection with the alteration, and if so, identify each such study.

M. Whether the product could be used interchangeably with products of other manufacturers, distributors or sellers and if so, please identify each such product and its manufacturer.

ANSWER:

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All Purpose Joint Compound:

A.-C. All Purpose Joint Compound - Casein, All Purpose Joint Compound - Vinyl Base Adhesive, All Purpose Joint Compound.

D. Approximately 4.5% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 85°F.

F. Packaged in 25 pound bags and 18 pound bags with 250' tape.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. Georgia-Pacific objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. Without waiving its objection, the head of the Gypsum Research Lab during this period was Clarence Shuttleworth.

L. There were no major alterations.

M. There were many manufacturers including the other defendants in this case, who manufactured a product

which competed with and was sold for the same purpose as this product.

Bedding Compound:

A.-C. Joint System Bedding Compound, Bedding Joint Compound, Bedding - Casein, Bedding - Vinyl Base Adhesive.

D. Approximately 3.0% to 7.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Packaged in 25 pound bags.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. Georgia-Pacific has insufficient information to respond to this Interrogatory in that this product was not developed by it or Bestwall Gypsum Company.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product

which competed with and was sold for the same purpose as this product.

Central Mix:

A.-C. Central Mix Joint Compound.

D. Approximately 3.0% to 6.0% chrysotile asbestos.

E. The product was designed to reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Unknown.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. Unknown.

K. Georgia-Pacific objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. Without waiving its objections, the head of the Gypsum Research Lab during this period was C. W. Lehnert.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Drywall Adhesive:

A.-C. Drywall Adhesive.

D. Approximately 0.8% chrysotile asbestos.

E. The product was designed to be used to attach wallboard to wood studs.

F. Unknown.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. Unknown.

K. See response to Interrogatory No. (K) above concerning Central Mix.

L. No major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Joint Compound:

A.-C. Joint System Cement, Joint System Compound, Wallboard Joint Compound, Joint System and Joint System Compound with Tape.

D. Approximately 2.5% to 6.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard

in order to provide a smooth and monolithic surface. Approximately 55° to 80° F.

F. Packaged in 18 pound bags with 250' tape, 4 pound bags with 60' tape, 4 pound bags with 60' tape and knife, 25 pound bags and 5 pound boxes.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Bedding Compound.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and sold for the same purpose as this product.

Kalite:

A.-C. Kalite.

D. Approximately 2.6% chrysotile asbestos.

E. The product was designed as a ceiling finishing material with noise reduction properties.

F. Packaged in 80 pound bags.

G. Not applicable.

H. Trowel.

I. Grey and white to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, and application instructions.

K. Georgia-Pacific objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. Without waiving its objections, the head of the Gypsum Research Lab during this period was G. A. Hoggatt.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Laminating Compound - Ready Mix:

A.-C. Laminating Compound - Ready Mix.

D. Approximately 4.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80° F.

F. Unknown.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. Unknown.

K. See response to Interrogatory No. (K) above concerning Central Mix.

L. There were no major alterations.

M. There were many manufacturers, including other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Lite Acoustic:

A.-C. Lite Acoustic, Light Acoustic and Lite - Acoustic.

D. Approximately 25% to 29.09% chrysotile asbestos.

E. The product was designed as a ceiling finishing material with noise reduction properties.

F. Packaged in 40 pound bags.

G. Not applicable.

H. Spray or trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufactured and in some instances a description of the product, its uses and application instructions.

K. See response to Interrogatory No. (K) above concerning Kalite.

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L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Patching Plaster:

A.-C. Patching Plaster.

D. Approximately 2.0% chrysotile asbestos.

E. The product was designed to be used to fill small holes and cracks in wallboard.

F. Packaged in 5, 25, and 100 pound bags.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Bedding Compound.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Ready Mix:

A.-C. Ready Mix Joint Compound and Ready Mix Topping.

D. Approximately 1.5% to 12.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Packaged in 1 and 5 gallon pails and 4 gallon boxes.

G. Not applicable.

H. Trowel.

I. White to off-white; paste.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Kalite.

L. There wre no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

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Spackling Compound:

A.-C. Spackling Compound.

D. Approximately 5.5% chrysotile asbestos.

E. The product was designed to be used to fill small holes and cracks in wallboard.

F. Packaged in 5 pound boxes or 25 pound bags.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. Product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses and application instructions.

K. See response to Interrogatory No. (K) above concerning Bedding Compound.

L. There were no major alterations.

M. There were many manufactures, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Speed Set:

A.-C. Speed Set, 1-Day Wallboard Joint Compound, Speed Set Joint Compound and Speed Set - Vinyl Gypsum Adhesive.

D. Approximately 2.75% yo 6.75% chrysotile asbestos.

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E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Packaged in 25 pound bags.

G. Not applicable.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Kalite.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Texture:

A.-C. Certex Texture, Bestex 1, Bestex 2, Bestex A, Bestex B, Bestex C, Bestex D, Wall Texture, Ceiling Texture, Ceiling Texture - Perlite, Ceiling Texture - Polystyrene, Ceiling Texture - Vermiculite.

D. Approximately 2.0% to 22.5% chrysotile asbestos.

E. The product was designed to provide a decorative finish to walls and ceilings.

F. Packaged in 5, 25, 32 and 40 pound bags.

G. Not applicable.

H. Spray, roller, brush or hand tools.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Bedding Compound.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Topping Compound:

A.-C. Topping Compound, Joint System Topping Compound, Topping Joint Compound, Topping - Casein, Topping - Vinyl Base Adhesive.

D. Approximately 3.0% to 7.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard

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in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Packaged in 25 pound bags.

G. Not applicble.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning Bedding Compound.

L. There were no major alterations.

M. There were many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

Triple Duty Joint Compound:

A.-C. Triple Duty Joint Compound, Triple Duty Wallboard Joint Comound and Triple Duty Joint Compound - Vinyl Base Adhesive.

D. Approximately 2.5% to 7.0% chrysotile asbestos.

E. The product was designed to conceal and reinforce the joints between sheets of gypsum wallboard

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in order to provide a smooth and monolithic surface. Approximately 55° to 80°F.

F. Packaged in 25, 50 and 100 pound bags.

G. Not applicble.

H. Trowel.

I. White to off-white; dry.

J. The product packaging contained the name of the product, manufacturer and in some instances a description of the product, its uses, cautions and application instructions.

K. See response to Interrogatory No. (K) above concerning All Purpose Joint Compound.

L. There were no major alterations.

M. There wre many manufacturers, including the other defendants in this case, who manufactured a product which competed with and was sold for the same purpose as this product.

14. Please state whether each of the asbestos-containing products in the preceding interrogatory was ever sold or supplied to any location within the State of Michigan, and if so, please state the following as to each such sale or occasion on which each product was provided:

A. Date of sale or supply;

B. Amount supplied;