FILE NAME: Kaiser Gypsum (KG)

DATE: 0000

DOC#: KG001

DOCUMENT DESCRIPTION: Legal - Exhibit List

	KAISER GYPSUM COMPANY	AUTHENTICATION	RELEVANCE
KG1	Kaiser Gypsum Company, Inc. ("KG") J-M Asbestos & Health Meeting List of Attendees: June, 5, 1970; August 8, 1972; April 25, 1973; October 17, 1973; December 3, 1973; December 4, 1973; October 18, 1975; January 15-17, 1974; June 24, 1975; September 24-25, 1974; December 7, 1976	• Authenticity By Contents of Writing A writing may be authenticated by evidence that the writing refers to or states matters unlikely to be known by anyone other than the person who is claimed to be the author of the writing; handwritten information on reverse side of document could have been supplied only by specific person. • Admission by Opposing Party • Actions by Opposing Party. Comparison by Others [certified copy of bond certificate]. • Comparison by Expert Witness An expert witness may be able to authenticate by comparison typewriting and other forms of communication. See Ca. Evid Sec. 1418, Comment. Unlike experts who may authenticate any "writing" by comparison, the trier of fact may make only handwriting comparisons. Ca Evid Sec. 1417.	
KG2	Johns-Manville Presentation "Asbestos and Health" customer seminars, dated March 1974.	See Authentication KG1, above. • Regularly Published Newspapers or Publications Printed material purporting to be a regularly published newspaper or publication is presumed to be authentic. CA Evid. Sec. 645.1	

	KAISER GYPSUM COMPANY	AUTHENTICATION	RELEVANCE
KG3	KG inter-office memo from L.R. Flicker to R.L. Allgood, et al., dated March 1, 1965, received from the Gypsum Association: Report on Industrial Hygiene Foundation of America, Jan. 12-14, 1965 and "Asbestos is Pointed Out As Cause of Lung Cancer", by Alton Blakeslee; AP Science Writer	See Authentication KG1, above.	
KG4	KG Inter-office Memorandum from L.R. Flicker to All Safety Supervisors, dated March 29, 1966	See Authentication KG1, above.	
KG5	July 30, 1970 Union Carbide Asbestos Toxicology Report.	See Authentication KG1, above.	
KG6	Kaiser Cement & Gypsum Corporation, GYPSUM DIVISION Organizational Charts, dated November 1, 1970	See Authentication KG1, above.	
KG7	December 27, 1971 KG Grigg letters to Harold Plate, Carey-Canadian Mines, Western Chemical Co. and Robert Tucker, Pacific Asbestos Corp. re: KG's "concern of data that asbestos may be a health hazard."	See Authentication KG1, above.	
KG8	January 4, 1972 KG memo to Plant Managers re: Asbestos Ecology & do not respond to inquiries re: asbestos fibers.	See Authentication KG1, above.	
KG9	January 11, 1972 KG memo attaching "Emergency Standards for Exposure to Asbestos Dust."	See Authentication KG1, above.	
KG10	February 4, 1972 Calidria Asbestos Marketing Manager John Myers letter to R. Grigg replying to inquiry re: asbestos toxicology.	See Authentication KG1, above.	
KG11	March 1, 1972 Schaper, KG VP Operations letter to EPA.	See Authentication KG1, above.	
KG12	March 9, 1972 Carey-Canadian Asbestos letter attaching President R.J. Merrill's response to inquiry re: asbestos health hazards using CC's asbestos.	See Authentication KG1, above.	
KG13	April 11, 1972 letter from Pacific Asbestos Corp.'s R. Tucker to Grigg responding to inquiry re: asbestos health hazards using CC's asbestos.	See Authentication KG1, above.	
KG14	June 28, 1972 KG inter-office memo re: Respirators for Asbestos workers.	See Authentication KG1, above.	
KG15	August 7, 1972 Kaiser Cement & Gypsum Corp. ("KC&G") KG inter-office from McCoe to G. Davis re: Plastic-Plastic Gun Cement warning label revision "this cement contains a small percentage of asbestos fibers."	See Authentication KG1, above.	

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KG16	September 28, 1972 KC&G inter-office memorandum from John Rohrer to C. Grimme, et al. re: Caution Notice on Gun Plastic Cement Bags	See Authentication KG1, above.	
KG17	KC&G inter-office memorandum from J.E. Toomey to McCoe, et al., dated September 28, 1972 re: Asbestos-Labeling Kaiser Cement Products. Recommendation: "Kaiser Cement not apply caution or warning labels to any of its cement packages, except those containing asbestos."	See Authentication KG1, above.	
KG18	October 5, 1972 memo re: Labeling Plastic & Plastic Gun Cement sacks.	See Authentication KG1, above.	
KG19	Minutes of the Annual Meeting Gypsum Association, Sheraton Blackstone Hotel, Chicago, Illinois, dated April 4, 1973	See Authentication KG1, above.	
KG20	July 6, 1973 KC&G inter-office memo re: California Asbestos Regulations	See Authentication KG1, above.	
KG21	Minutes of the Ninety-First Meeting of the Technical Committee, August 1, 2, 3, 1973	See Authentication KG1, above.	
KG22	Minutes of the Safety Committee Meeting, Airport Holiday Inn, Cleveland, Ohio, September, 19, 1973	See Authentication KG1, above.	
KG23	Minutes of the Semi-Annual Meeting, The Homestead, Hot Springs, Virginia, October 10-12, 1973 with Report of Special Task Force on Joint Treatment Compound.	See Authentication KG1, above.	
KG24	Johns-Manville, Internal Correspondence from N.W. Hendry to J.R.M. Hutcheson, dated December 7, 1973 "Asbestos & Health Presentations"	See Authentication KG1, above.	
KG25	December 18, 1973 Western Chemical & Manufacturing Co. letter to KG not producing 1600 Asbestos filler after 1/1/74.	See Authentication KG1, above.	
KG26	February 11, 1974 KC&G inter-office memo re: Safety Survey - Santa Ana Plant-1/23/74.	See Authentication KG1, above.	
KG27	March 1, 1974 KG inter-office memo from J.S. Sheahan at Antioch R&D to G.B. Kirk re: Dust from Joint Compound job operations. Attaching 3 reports from the Gypsum Association on asbestos dust and siliceous dusts during mixing and sanding of joint compound on typical jobs.	See Authentication KG1, above.	
KG28	March 7, 1974 Minutes of the Safety Committee Meeting, Dallas, Texas.	See Authentication KG1, above.	
KG29	June 12, 1974 memo re Industrial Hygiene Inspection-KG Delanco Plant	See Authentication KG1, above.	

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KG30	Minutes of the Ninety-Third Meeting of the Technical Committee, August 7, 8, 9, 1974	See Authentication KG1, above.	
KG31	August 14, 1974 Minutes of Safety Committee Meeting.	See Authentication KG1, above.	
KG32	February 20, 1975 Gates, McDonald Co. re: safety inspection recommendations of 7/10/74. "Of interest is the fact that State inspections have disclosed acceptable asbestos counts."	See Authentication KG1, above.	
KG33	Minutes of the Ninety-Eighth Meeting of the Technical Committee, February 16, 17, 18, 1977	See Authentication KG1, above.	
KG34	Minutes of the Annual Meeting, Gypsum Association, The Drake Hotel, Chicago, Illinois, April 6, 1977	See Authentication KG1, above.	
KG35	Minutes of the Ninety-Ninth Meeting of the Technical Committee, August 10, 11, 12, 1977	See Authentication KG1, above.	
KG36	Minutes of the Semi-Annual Meeting of the Gypsum Association, October 12-13, 1977	See Authentication KG1, above.	
KG37	KC&G Corp.'s Answers to Interrogatories served January 31, 1978, Demetrio Duran v. Johns-Manville Sales Corp., et al., Superior Court, San Francisco County, Case No. 719-238.		
KG38	Plaintiff's First Set of Interrogatories Propounded to Defendant KG (Subcontractors, installer and/or applicators), served December 27th, 1984, IN RE: Los Angeles Unified School District v. Owens-Corning Fiberglas Corporation, et al., Superior Court of California, County of Los Angeles, Case No. C 440 317		
KG39	Interrogatories Propounded and Served Concurrently with Requests for Admission to All Defendants, served April 18th 1985, IN RE: Los Angeles Unified School District v. Owens-Corning Fiberglas Corporation, et al., Superior Court of California, County of Los Angeles, Case No. C 440 317		
KG40	Kaiser Cement Corporation and Kaiser Gypsum Company, Inc.'s Answers to Interrogatories, Set No. 10, dated October 28, 1985, IN RE: Related Asbestos Cases Consolidated For Discovery (McQuaid, Bedford & Brayton), Superior Court of California, County of Solano, Case No.1327 ** "Leading Plastering Contractor's names & pictures"**		

	KAISER GYPSUM COMPANY	AUTHENTICATION	RELEVANCE
KG41	Kaiser Cement Corporation and Kaiser Gypsum Company, Inc.'s Responses to Plaintiffs' Standard Interrogatories to Defendants, dated February 12, 1986, IN RE: Complex Asbestos Litigation, San Francisco Superior Court, Case No. 828684		
KG42	Kaiser Cement Corporation and Kaiser Gypsum Company, Inc.'s Supplemental Responses to Plaintiffs' Standard Interrogatories to Defendants, served May 15, 1986, IN RE: Complex Asbestos Litigation, San Francisco Superior Court, Case No. 828684.		
KG43	Kaiser Gypsum Company, Inc.'s Amended Responses and Answers to Plaintiffs' Matter Set of Interrogatories and Request for Production to Defendants, dated July 27, 1992, In Re: All Asbestos-Related Personal Injury or Death Cases Filed or to be Filed in Dallas County, Texas, In the District Court, Dallas County, Texas 160th Judicial District		
KG44	Consolidated Partial Response of Kaiser Cement Corporation and Kaiser Gypsum Company, Inc. to Plaintiffs' Request for Production of Documents, served August 7, 1992, IN RE: Cossey v. Abex Corporation, et al., San Francisco Superior Court , Case No. 920148		
KG45	KAISER CEMENT CORPORATION'S Response to Plaintiffs' Request for Production of Documents, served December 12, 1996, Bart Stocktman v. Abex Corp., San Francisco Superior Court, Case No. 962298.		
KG46	KAISER GYPSUM COMPANY, INC.'s updated responses to plaintiffs' Standard Interrogatories to Defendants, served December 30, 1996, IN RE: Complex Asbestos Litigation, San Francisco Superior Court, Case No. 828684		
KG47	KAISER GYPSUM COMPANY, INC's Responses to Plaintiffs' Standard Interrogatories to All Defendants, served July 22, 1997, IN RE: Complex Asbestos Litigation, San Francisco Superior Court, Case No. 828684		
KG48	KAISER GYPSUM COMPANY, INC.'s Responses to Plaintiffs' First Set of Interrogatories and Request For Production of Documents, served May 14, 1998, Pickner et al. V. Owens Corning, et al., in the Superior Court of Washington for King County Case No: 98-2-09390-1 SEA		

	KAISER GYPSUM COMPANY	AUTHENTICATION	RELEVANCE
KG49	Condensed Transcript of Joseph Ross Hobby taken on November 4, 1998, Pickner et al. V. Owens Corning, et al., in the Superior Court of Washington for King County Case No: 98-2-09390-1 SEA		
KG50	Videotaped Deposition Transcript of John E. Crum taken on 11/06/98 in Crum, et al. V. The E.J. Bartells Company, Superior Court of the State of Washington, In and For the county of King, Case No. 98-2-24915-3SEA		
KG51	Videotaped Deposition of Brentwood Crosby taken on January 19, 1999 in Crum, et al. V. The E.J. Bartells Company, Superior Court of the State of Washington, In and For the county of King, Case No. 98-2-24915-3SEA		
KG52	KAISER GYPSUM COMPANY, INC.'s First Updated Responses to Plaintiffs' Standard Interrogatories to Defendants, served August 3, 1999, IN RE: Complex Asbestos Litigation, San Francisco Superior Court, Case No. 828684		