

FILE NAME: US Gypsum (USG)

DATE: 1986 USG065

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DOCUMENT DESCRIPTION: Legal - Affidavit of S K Torrey

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

GREENVILLE COUNTY SCHOOL
DISTRICT,

Plaintiff,

-vs-

UNITED STATES GYPSUM COMPANY,
W. R. GRACE & COMPANY, and
NATIONAL GYPSUM COMPANY,

Defendants.

Civil Action No. 82-3142-14

AFFIDAVIT OF S. K. TORREY
RE: DOCUMENT REVIEW AND
PRODUCTION

S. K. Torrey, being first duly sworn on oath, deposes
and states:

1. This Affidavit is filed pursuant to the Court
Order dated April 25, 1984, directing that the defendants shall
file a statement dealing with the Plaintiff's Request to Produce
Documents, setting forth the "encompassment of the search, the
person or persons who participated in the search, and the iden-
tification of all documents for which they claim privilege."

2. She is Senior Attorney - Litigation, employed
by and representing United States Gypsum Company, one of the
defendants herein and has been employed in the same or similar
capacity since March, 1979. During the period August, 1977 and
March, 1979, she held the position of attorney.

3. During the entire period from August, 1977 to the
present, she has had primary responsibility for the management
and coordination of all aspects of this defendant's involvement
in asbestos cases, both personal injury and property damage.

("asbestos litigation"). Part of these responsibilities included searching for documents which were or might be relevant to the "asbestos litigation." This search for documents was performed by her personally or by others under her direction and control. All documents reviewed and/or produced for the "asbestos litigation" were discovered during this time frame.

4. Said search for documents commenced in approximately 1978 and has been an on-going procedure. No attempt was made to systematically record the identity of each person consulted or each drawer or box opened. To reconstruct this process would be difficult at best and bound to result in omissions of names or places.

5. The foregoing notwithstanding, in general the following locations were searched: USG central corporate files (located at 101 South Wacker Drive and 500 Orleans Street, Chicago, Illinois), research department, product management, quality department, safety department, secretarial department, personnel department, data processing, architectural services, advertising, various plants, sales and division offices, insurance department, and libraries. Persons affiliated with these departments were consulted and may have participated in the search. Literally hundreds of current and/or former employees have been consulted.

6. Plaintiff's Request for Production herein was filed on or about January 13, 1983, some five years after the search for documents was begun.