

file/GAF to court

JUL 20 1983

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service by mail
6/28/83

PLAINTIFF'S
EXHIBIT
GF-2456

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

IN RE: STERNS, BROWN & PINNEY	)	No. 805555
CONSOLIDATED FOR DISCOVERY	)	
RELATED SHIPYARD AND APPLICATOR	)	GAF CORPORATION'S RESPONSE
ASBESTOS CASES.	)	TO PLAINTIFF'S REQUEST
	)	FOR ADMISSION

PROPOUNDING: Plaintiffs
RESPONDING: Defendant, GAF Corporation
SET: One (1)
GAF Corporation (GAF) responds and objects to
Plaintiffs' First Set of Admissions as follows:

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1 REQUEST FOR ADMISSION NO. 14:

2 Do you admit that the harmful effects of asbestos
3 dust and fibers extends not only to workers actually handling
4 your asbestos products but also to:

5 (a) Other workers in the area where your asbestos
6 products are being used; and to

7 (b) Members of the families of workers, who dusted
8 and laundered the work clothes of such workers whose work
9 clothes contained your asbestos products dust?

10 RESPONSE TO REQUEST FOR ADMISSION NO. 14:

11 GAP admits that if a person, either directly
12 or indirectly exposed, inhales a sufficient quantity of
13 asbestos dust, he could contract asbestosis, however the
14 precise quantity of asbestos dust necessary to cause such
15 disease is unknown. Apparently not everyone who inhales
16 asbestos dust contracts asbestosis. Except as expressly
17 admitted, ~~GAP denies this Request for Admission.~~

18 REQUEST FOR ADMISSION NO. 15:

19 Do you admit that from 1940 to the present you
20 have not formulated any rules, written or oral, for the
21 handling of your asbestos products by your own employees?

22 RESPONSE TO REQUEST FOR ADMISSION NO. 15:

23 Admitted.

24 REQUEST FOR ADMISSION NO. 16:

25 Do you admit that you do not maintain a library
26 dealing with industrial hygiene, medicine, safety or engineering?

1 RESPONSE TO REQUEST FOR ADMISSION NO. 27:

2 Denied.

3 REQUEST FOR ADMISSION NO. 28:

4 Do you admit that, after the initial placement
5 of warning labels regarding the hazards of exposure to asbestos
6 on your asbestos containing products, you did not recall
7 or make any attempt to recall those asbestos products and/or
8 asbestos materials which had been sold in containers without
9 such labels?

10 RESPONSE TO REQUEST FOR ADMISSION NO. 28:

11 Admitted.

12 REQUEST FOR ADMISSION NO. 29:

13 Do you admit that you have not conducted, participated
14 or directly contributed any funds to studies to determine
15 the effects of your asbestos containing products on workers
16 working with such products?

17 RESPONSE TO REQUEST FOR ADMISSION NO. 29:

18 Admitted.

19 REQUEST FOR ADMISSION NO. 30:

20 Do you admit that you have not conducted, participated
21 or directly financed or had conducted for you, any studies
22 to determine the effects of inhalation of asbestos dust
23 or fibers by one using or being exposed to your asbestos
24 insulation products?

25 RESPONSE TO REQUEST FOR ADMISSION NO. 30:

26 Admitted.