

MASTER DISCOVERY

CAUSE NO. 2004-03964

IN RE: ASBESTOS LITIGATION

§ IN THE DISTRICT COURT OF
§
§ HARRIS COUNTY, TEXAS
§
§ 11TH JUDICIAL DISTRICT

**DEFENDANT GEORGIA-PACIFIC CORPORATION'S FIRST SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO MASTER INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to the Texas Rules of Civil Procedure, Defendant Georgia-Pacific Corporation ("Georgia-Pacific") files this its First Supplemental Objections and Responses to Master Set of Interrogatories and Request for Production of Documents as follows.

INTERROGATORY NO. 10: Please identify each asbestos-containing product that Defendant mined, manufactured, marketed, produced, researched, sold, distributed, or patented at any time. For each product identified, please provide the following information:

- a. the trade name or brand name of the product mined, manufactured, marketed, produced, researched, sold, distributed, and/or patented;
- b. the date the product was patented (if patented), placed on the market (if marketed), and the inclusive dates of the product's manufacture or sale (if manufactured or sold);
- c. the physical and chemical composition of the product, including the type of asbestos contained in the product and the percentage or amount of asbestos in each product;
- d. the date Defendant stopped mining, manufacturing, marketing, producing, researching, selling, and/or distributing the product;
- e. the date the product was removed from the market (if marketed) and no longer sold or distributed and the reasons therefore;
- f. the date asbestos was removed from the product, if ever, and the reasons for removing it;
- g. the seller(s), distributor(s) and/or supplier(s) from whom Defendant purchased the asbestos used in each particular product, and the type (example: amosite, chrysotile) and quantity of asbestos Defendant purchased from the seller(s);
- h. whether Defendant ever conducted any testing on the product to determine whether it posed any potential hazard to human or non-human health;
- i. the plant or facility where the product was mined, manufactured, produced, or researched;
- j. the foreseeable users of the product (such as insulators, helpers, pipefitters,

- boilermakers, welders, machinists, plasterers, drywall finishers, carpenters, shipwrights, etc.); and
- k. a description of any warnings that Defendant placed on the product or its packaging, operating manuals, brochures, catalogs, or other related printed material. This description should include the precise language of the warning, the size of the warning, the location on the product or its packaging where the warning was printed, and when the warning was first placed on the product.

RESPONSE: Georgia-Pacific objects to Interrogatory No. 10 on the grounds that it is compound, vague and ambiguous, overly broad, unduly burdensome, and seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in these cases, particularly as it seeks information regarding products not at issue in these cases. Subject to and without waiving these objections, Georgia-Pacific states that it has never been engaged in mining, distributing, marketing, advertising or selling raw asbestos. By way of further response, Georgia-Pacific states that either Bestwall or Georgia-Pacific, or both, manufactured and distributed the following products which contained asbestos as a constituent ingredient. In addition, several of these products also contained talc as a constituent ingredient. Georgia-Pacific denies that any products which do not contain asbestos as a constituent ingredient but contain talc are asbestos containing products as defined in these interrogatories.

ALL PURPOSE JOINT COMPOUND

Georgia-Pacific first placed All Purpose Joint Compound on the market for national distribution in 1967. Prior to that time, All Purpose Joint Compound may have been available for sale in limited areas. Georgia-Pacific first introduced asbestos-free All Purpose Joint Compound in 1973. Georgia-Pacific continues to sell asbestos-free All Purpose Joint Compound. The compound is a dry white or off-white powder used in wallboard construction to finish walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. The product is packaged in bags. Georgia-Pacific's asbestos-containing All Purpose Joint Compound contained 0-7% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of All Purpose Joint Compound at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located at Georgia-Pacific's document repository in Atlanta, Georgia. All Purpose may have contained up to 1% talc.

BEDDING COMPOUND

Bestwall first sold Bedding Compound in 1956, and Georgia-Pacific continued to manufacture Bedding Compound after it acquired Bestwall in 1965. Georgia-Pacific first introduced asbestos-free Bedding Compound in 1973. The last year that asbestos-containing Bedding Compound was sold by Georgia-Pacific was

approximately 1977. Georgia-Pacific continues to sell asbestos-free Bedding Compound. Bedding Compound is a dry white or off-white powder used in wallboard construction to finish walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. It is packaged in bags. Asbestos-containing Bedding Compound contained 0-7% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Bedding Compound at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located at Georgia-Pacific's document repository in Atlanta, Georgia. Bedding Compound may have contained up to 1% talc.

CENTRAL MIX

The first year that Georgia-Pacific sold Central Mix was 1970. The last year that Georgia-Pacific sold asbestos-containing Central Mix was 1973. Central Mix was a dry white or off-white powder used in wallboard construction to finish walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Central Mix was packaged in bags. Central Mix contained 3-7% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Central Mix at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located at Georgia-Pacific's document repository in Atlanta, Georgia. Central Mix may have contained up to 1% talc.

DRYWALL ADHESIVE

Georgia-Pacific sold Drywall Adhesive in 1972. The product came in the form of a paste and was designed to attach wallboard to wood studs. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Drywall Adhesive was packaged in tubes. Drywall Adhesive contained 0.8% chrysotile asbestos.

JOINT COMPOUND

Bestwall first sold a product with the brand name "Joint Compound" in 1956, and Georgia-Pacific continued to manufacture Joint Compound after it acquired Bestwall in 1965. The last year that Georgia-Pacific sold a product with the brand name "Joint Compound" was approximately 1971. Joint Compound was a dry white or off-white powder used in wallboard construction to finish walls and

ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Joint Compound was packaged in bags. Asbestos-containing Joint Compound contained 0-6% chrysotile asbestos.

KALITE

Bestwall sold Kalite from 1956 to 1959. It was a dry white or off-white powder intended to be used as an acoustical plaster. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. The product was packaged in bags. Kalite contained 0-2.6% chrysotile asbestos.

LAMINATING COMPOUND - READY MIX

Georgia-Pacific sold Laminating Compound - Ready Mix in 1969. The product came in paste form and was used to laminate wallboard. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. The packaging for this product is unknown. Georgia-Pacific's Laminating Compound - Ready Mix contained 0-4% chrysotile asbestos.

LITE ACOUSTIC

Bestwall sold Lite Acoustic between 1958 and 1964. The product was a dry white or off-white powder intended for use as an acoustical plaster. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Lite Acoustic was packaged in bags. Lite Acoustic contained 25-29.09% chrysotile asbestos.

PATCHING PLASTER

Bestwall first sold Patching Plaster in 1956, and Georgia-Pacific continued to manufacture Patching Plaster after it acquired Bestwall in 1965. Georgia-Pacific removed asbestos from Patching Plaster in 1975. The last year that Georgia-Pacific sold asbestos-containing Patching Plaster was approximately 1976. Georgia-Pacific continues to sell asbestos-free Patching Plaster. The product is a dry white or off-white powder that is used to patch certain plasters. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. It is packaged in bags. Asbestos-containing Patching Plaster contained 0-2% chrysotile asbestos.

READY MIX

Ready Mix was first sold by Bestwall in 1963, and Georgia-Pacific continued to manufacture Ready Mix after it acquired Bestwall in 1965. Georgia-Pacific introduced asbestos-free Ready Mix in 1974. The last year that asbestos-containing Ready Mix was manufactured was 1977. Georgia-Pacific continues to sell asbestos-free Ready Mix. The product is a paste used in wallboard construction to finish walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Ready Mix packages include boxes, buckets, or pails. Asbestos-containing Ready Mix contained 0-4.6% chrysotile asbestos.

Talc is and has been a constituent ingredient in certain formulas of Ready Mix at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located in Georgia-Pacific's document repository in Atlanta, Georgia. Ready Mix may have contained up to 15% talc.

SPACKLING COMPOUND

Bestwall began selling Spackling Compound in 1956, and Georgia-Pacific continued to manufacture Spackling Compound after it acquired Bestwall in 1965, until 1970 or 1971. The product was a dry white or off-white powder used to patch or repair walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. It was packaged in bags or boxes. Spackling Compound contained 5.5% chrysotile asbestos.

SPEED SET/ONE DAY

Bestwall began selling One Day in 1963. Georgia-Pacific continued to manufacture and sell the product after it acquired Bestwall in 1965. The name of the product was changed to Speed Set in January 1970. Georgia-Pacific introduced asbestos-free Speed Set in May 1973. By October 1973, Speed Set was no longer manufactured using asbestos as a constituent ingredient. Georgia-Pacific continues to sell asbestos-free Speed Set. The product is a dry white or off-white powder used in wallboard construction to finish walls or ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Speed Set is packaged in bags. Asbestos-containing Speed Set contained 0-6.75% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Speed Set joint compound at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been provided to Plaintiff's counsel and located at Georgia-

Pacific's repository in Atlanta, Georgia. Speed Set may have contained up to 5% talc.

TEXTURE

Bestwall/Georgia-Pacific Texture was sold under various trade or brand names, including: Certex, Bestex, Wall Texture, Ceiling Texture/Perlite, Ceiling Texture/Vermiculite, and Ceiling Texture/Polystyrene. The first Texture was sold by Bestwall in 1956, and Georgia-Pacific continued to manufacture the product after it acquired Bestwall in 1965. Georgia-Pacific introduced asbestos-free Texture in 1972. The last year in which Georgia-Pacific sold asbestos-containing Texture was approximately 1974. Georgia-Pacific continues to sell asbestos-free Texture. Texture is a dry white or off-white powder used to give a textured, decorative appearance to walls or ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Texture is packaged in bags. Asbestos-containing Texture contained 0-15% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Textures at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located in Georgia-Pacific's document repository in Atlanta, Georgia. Textures may have contained up to 10% talc.

TOPPING COMPOUND

Bestwall first sold Topping Compound in 1956, and Georgia-Pacific continued to manufacture Topping Compound after it acquired Bestwall in 1965. Georgia-Pacific introduced asbestos-free Topping Compound in 1973. The last year that Georgia-Pacific sold asbestos-containing Topping Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free Topping Compound. The product is a dry white or off-white powder used in wallboard construction to finish walls or ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. It is packaged in bags. Asbestos-containing Topping Compound contained 0-7% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Topping Compound at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located at Georgia-Pacific's document repository in Atlanta, Georgia. Topping Compound may have contained up to 1% talc.

TRIPLE DUTY JOINT COMPOUND

Georgia-Pacific has sold Triple Duty Joint Compound under the following brand/trade names: Triple Duty Joint Compound, Triple Duty Wallboard Joint

Compound, and Triple Duty Joint Compound-Vinyl Based Adhesive. Georgia-Pacific first sold Triple Duty Joint Compound in 1965. Georgia-Pacific introduced asbestos-free Triple Duty Joint Compound in 1973. The last year that Georgia-Pacific sold asbestos-containing Triple Duty Joint Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free Triple Duty Joint Compound. The product is a dry white or off-white powder used in wallboard construction to finish walls and ceilings. This product could not withstand high temperatures, moisture or excessive vibration. For these reasons, use of this product in industrial conditions was neither recommended nor foreseeable and, indeed, would have constituted a misuse of the product. Triple Duty Joint Compound is packaged in bags. Georgia-Pacific's asbestos-containing Triple Duty Joint Compound contained 0-7% chrysotile asbestos.

Talc was a constituent ingredient in certain formulas of Triple Duty at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located at Georgia-Pacific's document repository in Atlanta, Georgia. Triple Duty may have contained up to 2% talc.

OTHER

Based upon current information and knowledge to date, from approximately 1964 to 1974, Georgia-Pacific used chrysotile asbestos pellets, believed to have been supplied by Union Carbide, as an additive to certain paperboard produced at its Bellingham, Washington board mill, which Georgia-Pacific did not sell directly to consumers, but rather sold to various converting companies. In addition, for a limited period of time, Georgia-Pacific used Union Carbide asbestos as an additive in one of its grades of industrial resins. Investigation into the nature of this resin, its intended use, and the period of its use of asbestos, if any, is ongoing. If necessary, Georgia-Pacific will supplement its response to this Interrogatory concerning these products as more information becomes available.

From time to time, some of Georgia-Pacific's Distribution Centers throughout the United States may have purchased and sold small quantities of asbestos-containing products manufactured by other companies. These products generally were limited to conventional building products and did not include commercial or industrial products, such as industrial insulation products, fire proofing, asbestos cloth, or raw asbestos. Some of the products known to have been sold through the Distribution Centers, but which were not manufactured by Georgia-Pacific, include, but are not limited to, asbestos cement board manufactured by Johns-Manville, various roofing products containing asbestos from various manufacturerers and asbestos siding manufactured by Supradur (or perhaps Supradur) Corporation.

Under limited circumstances, Georgia-Pacific rebranded joint system products manufactured by Kelly-Moore, and perhaps others, with its name. Georgia-Pacific also states that it sold some roof coating products rebranded with its name

beginning in approximately 1973 in a limited geographical area. Georgia-Pacific or Bestwall also sold a small amount of asbestos-containing joint system products to Johns-Manville, Flintkote, and Big Horn Gypsum Company, which would have been sold under the buyers' labels for various time periods from the mid-1960s to mid-1970s.

Georgia-Pacific's Gypsum Division sold its asbestos-containing products through its Distribution Division. Georgia-Pacific operated more than 175 Distribution Centers for many years, and discretion for sales of products not manufactured by Georgia-Pacific was retained at the level of the individual Distribution Center Manager. Records regarding sales of such products originated from the individual Distribution Centers and consist principally of large volumes of sales invoices, which are generally organized chronologically by customer name. It is unknown how complete these records are. Therefore, it is virtually impossible to identify the customers and/or locations to which such products were sold and shipped without manually reviewing thousands of pages of these documents. Nevertheless, some of the products known to have been sold through the Distribution Centers, but which were not manufactured by Georgia-Pacific, include, but are not limited to, asbestos cement board manufactured by Johns-Manville, various roofing products containing asbestos from various manufacturers, and asbestos siding manufactured by Supradur (or perhaps Supradur) Corporation. Upon the request of Plaintiffs, these records, as well as other records pertaining to Georgia-Pacific's Gypsum Division's manufacture and sale of asbestos-containing products will be made available to Plaintiffs' counsel for inspection and copying in Atlanta, Georgia, at a mutually agreeable time.

The products listed above were manufactured at the following facilities:

- All Purpose Joint Compound was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Chicago, Illinois; and Marietta, Georgia.
- Bedding Compound was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Chicago, Illinois; and Marietta, Georgia.
- Central Mix was manufactured at the following Georgia-Pacific facilities: Acme, Texas and Marietta, Georgia.
- Drywall Adhesive was manufactured at Georgia-Pacific's Akron, New York facility.
- Joint Compound was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Blue Rapids, Kansas; Chicago, Illinois; and Marietta, Georgia.

- Kalite was manufactured at the following Bestwall facilities: Acme, Texas and Akron, New York.
- Laminating Compound – Ready Mix was manufactured at Georgia-Pacific's Akron, New York facility.
- Lite Acoustic was manufactured at the following Bestwall facilities: Acme, Texas; Akron, New York; Blue Rapids, Kansas; Brunswick Georgia; Fort Dodge, Iowa; Grand Rapids, Michigan; and Sigurd, Utah.
- Patching Plaster was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Blue Rapids, Kansas; and Brunswick, Georgia.
- Spackling Compound was manufactured at Georgia-Pacific's Acme, Texas facility.
- Speed Set/One Day was manufactured at Georgia-Pacific's Acme, Texas facility.
- Texture was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Chicago, Illinois; Marietta, Georgia; and Sigurd, Utah.
- Topping Compound was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Chicago, Illinois; and Marietta, Georgia.
- Triple Duty Joint Compound was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Chicago, Illinois; and Marietta, Georgia.
- Ready Mix was manufactured at the following Georgia-Pacific facilities: Acme, Texas; Akron, New York; Brunswick, Georgia; and Milford, Virginia.
- Industrial Plasters were manufactured at the following Georgia-Pacific facilities: Blue Rapids, Kansas; Ft. Dodge, Iowa; Acme, Texas; Grand Rapids, Michigan; and Sigurd, Utah.
- Prepared Trowel Finish was manufactured at the following Georgia-Pacific facilities: Blue Rapids, Kansas; Wilmington, Delaware; Akron, New York; Ft. Dodge, Iowa; and Brunswick, Georgia.

Bestwall and Georgia-Pacific manufactured and sold a number of industrial plasters, including, but not limited to, metal casting, molding, and breakaway plasters. These products generally are dry powders which are used in various industrial casting, tooling, and molding applications. Georgia-Pacific does not have any information reflecting that any Metal Casting Plaster which contained

asbestos as a constituent ingredient was marketed, nor that any other industrial plaster contained asbestos as a constituent ingredient. Talc was a constituent ingredient in certain formulas of industrial plasters at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located in Georgia-Pacific's document repository in Atlanta, Georgia. Industrial plasters may have contained up to 27% talc.

Bestwall first sold Prepared Trowel Finish in 1956, and Georgia-Pacific continued to manufacture Prepared Trowel Finish after it acquired Bestwall in 1965. Prepared Trowel Finish was a pre-mixed gypsum finish coat plaster. It never contained asbestos as a constituent ingredient. Talc was a constituent ingredient in certain formulas of Prepared Trowel Finish at varying times. Georgia-Pacific incorporates by reference the formulas which have previously been produced to Plaintiff's counsel and are located in Georgia-Pacific's document repository in Atlanta, Georgia. Prepared Trowel Finish may have contained up to 34% talc.

Talc was a constituent ingredient of a few of the joint system and industrial plaster products manufactured by Georgia-Pacific and its predecessor Bestwall Gypsum Company. Talc was a constituent ingredient in certain formulas for certain products at varying times. Georgia-Pacific incorporates by reference into this interrogatory its formulas which have been previously produced to Plaintiff's counsel. Moreover, talc has been specified for use on the back of gypsum board to prevent scuffing during shipment. Georgia-Pacific and/or its predecessor have purchased talc from the following suppliers:

- Pioneer Talc Co., Van Horn, TX;
- Suzorite Mineral Products, Inc., Spruce Pine, NC;
- Luzenac America, Inc, Englewood, CO;
- Whittaker, Clark & Daniels, Inc.;
- Alberene Stone Corp.;
- Eastern Magnesia Talc Co.;
- Southwestern Talc Co., Llano, Texas;
- Southern Talc Co.;
- International Talc Co.;
- RT Vanderbilt Co., Inc.;

- International Pulp Co., Hailesboro, NY;
- Carbola Chemical Co., Natural Bridge, NY;
- Cyprus Mines Corp., United Sierra Div., Trenton, NJ; and
- Windsor Materials, Inc., Windsor, VT.

By way of further response to this Interrogatory, Georgia-Pacific states that beginning in 1973, caution labels were affixed to the containers of Georgia-Pacific's asbestos-containing joint systems products, as required by OSHA. The caution labels were worded, in accordance with the recommendations of OSHA, as follows:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

Where appropriate, the following additional language appeared on the labels beginning in 1974:

WHEN MIXING OR SANDING USE APPROVED RESPIRATOR
or
USE APPROVED RESPIRATOR WHEN SANDING

Georgia-Pacific discontinued use of the caution labels when asbestos was eliminated from its products, a process which was completed in 1977. A copy of the caution label is in the custody of Georgia-Pacific's national counsel and, at the request of Plaintiffs, it will be made available to Plaintiffs' counsel for inspection and copying in Atlanta, Georgia.

Georgia-Pacific also states that a limited amount of documentation still exists concerning the advertisement of its asbestos-containing products, and product brochures and photographs of product packaging are available for most of the years during which Georgia-Pacific and/or Bestwall manufactured asbestos-containing products. These documents would be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiffs, Georgia-Pacific will make these documents available to Plaintiffs' counsel for inspection and copying in Atlanta, Georgia, at a mutually agreeable time.

In further response to this Interrogatory, Georgia-Pacific states that it did not obtain patents for its limited number of asbestos-containing products. Additionally, to the best of its knowledge Georgia-Pacific did not "conduct any testing" of its asbestos-containing products, as described in this Interrogatory. However, as a member of trade organizations, Georgia-Pacific may have contributed indirectly to studies or research of the relationship between exposure to asbestos-containing products and pulmonary abnormalities. Specifically, in November, 1973, testing of asbestos-containing joint systems products similar to those manufactured by Georgia-Pacific was conducted through the Gypsum Association, of which Georgia-Pacific was a member. The tests were conducted with OSHA approval. The results of the testing are contained in a report dated November 19, 1973 entitled "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds," which was finalized and made available to Gypsum Association members in the spring of 1974. A copy of this report, and other responsive documents, would be contained in Georgia-Pacific's collection of corporate documents, relating to its asbestos-containing products. At the request of Plaintiffs, Georgia-Pacific will make these documents available to Plaintiffs' counsel for inspection and copying in Atlanta, Georgia, at a mutually agreeable time.

Respectfully submitted,

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COUNSEL FOR DEFENDANT
GEORGIA-PACIFIC CORPORATION

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing has been forwarded to counsel of record for Plaintiffs herein, on this 14 day of October, 2005.

Laura Ellis Kugler
By: _____
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Re: Cause No. 2004-03964
In Re: Asbestos Litigation
11th Judicial District Court of Harris County, Texas

Dear Clerk:

Enclosed please find the original and one copy of Defendant Georgia-Pacific Corporation's First Supplemental Objections and Responses to Master Interrogatories and Request for Production of Documents regarding the above-styled and numbered cause of action. Please file the original among the papers of this cause and return the file marked copy to my office in the enclosed stamped self addressed envelope.

Your assistance in this regard is greatly appreciated.

Very truly yours,

Laura Ellis Kugler

LEK/kt

Enclosure

cc: Via LexisNexis
All Known Counsel of Record