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KAISER GYPSUM COMPANY, INC.

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TO/TSC

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

IN RE: SAN FRANCISCO COUNTY
COMPLEX ASBESTOS LITIGATION

CASE NO. 828684

PLAINTIFF'S EXHIBIT

KG-386

KAISER GYPSUM COMPANY, INC.'S
RESPONSES TO PLAINTIFFS'
STANDARD INTERROGATORIES
TO ALL DEFENDANTS

GO129

PROPOUNDING PARTY : Plaintiffs
RESPONDING PARTY : Defendant Kaiser Gypsum Company, Inc.
SET : Standard
DATE :

COMES NOW defendant Kaiser Gypsum Company, Inc. (hereinafter "Kaiser Gypsum"), and provides the following responses to Plaintiffs' Standard Interrogatories To All Defendants propounded pursuant to San Francisco County Complex Asbestos Litigation General Order No. 129:

KAISER GYPSUM'S PRELIMINARY STATEMENT

Kaiser Gypsum submits this preliminary statement to memorialize certain steps taken to implement the standard discovery regime adopted pursuant to the revised General Orders filed November 15, 1996 governing asbestos-related personal injury

1 Additionally, Kaiser Gypsum Technical Bulletins 5703-A, dated October 1973,
2 and 5707, dated October 1973 and November 1976, prescribed the use of respirators
3 during spray application.

4 B. Yes.

5 C. Beginning in 1972; exact date unknown.

6 D. This caution label remained the same during the remaining time the products
7 upon which it was used continued to use asbestos as a component.

8 E. Joseph R. Hobby, Vice President, 2680 Bishop Drive, San Ramon,
9 California.

10 **RESPONSE TO INTERROGATORY NO. 38:**

11 Most of Kaiser Gypsum's products were sold in the form of a powder or paste;
12 therefore, the name of the company was on the packaging of the product. However,
13 Kaiser Gypsum's 2-hour fire-rated ceiling tiles and suspended ceiling lay-in board
14 products (in which asbestos was used as a component were specially marked because
15 they looked similar to other Kaiser Gypsum mineral fiberboard ceiling tiles and lay-in
16 boards (that did not contain asbestos as a component) and building inspectors wanted
17 to be able to check to make sure that 2-hour fire-rated products actually were being
18 used by the building contractor when those had been specified. It is believed that each
19 piece of 2-hour fire-rated ceiling tile and suspended ceiling lay-in board was stamped
20 on the back with either the initial "KG" or the word "Kaiser Gypsum." Such marking was
21 employed during the entire period that the 2-hour fire-rated products were
22 manufactured by Kaiser Gypsum.

23 **RESPONSE TO INTERROGATORY NO. 39:**

24 Kaiser Gypsum has no knowledge that it ever purchased or otherwise acquired
25 an asbestos-containing product line from another person or entity.

26 **RESPONSE TO INTERROGATORY NO. 40:**

27 Kaiser Gypsum has no knowledge that it ever sold an asbestos-containing
28 product line to another person or entity.