

Orig. @ Ex. C

PLAINTIFF'S EXHIBIT

CHV-79

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5 Attorneys for Defendant
CHEVRON PRODUCTS COMPANY
6

POS 8/22/97
VERIF Y
LDF 2/18/98

7
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10
11) NO. 828684
12 IN RE: COMPLEX ASBESTOS)
LITIGATION) RESPONSES OF DEFENDANT CHEVRON
13) PRODUCTS COMPANY TO PLAINTIFFS'
STANDARD INTERROGATORIES TO ALL
14) DEFENDANTS

15 PROPOUNDING PARTY: PLAINTIFFS
16 RESPONDING PARTY: DEFENDANT CHEVRON PRODUCTS COMPANY
17 SET NUMBER: GENERAL ORDER 129
18

19 Defendant CHEVRON PRODUCTS COMPANY, a division of
20 CHEVRON U.S.A. INC. (hereinafter "Chevron"), provides the
21 following objections and responses to San Francisco Superior
22 Court General Order No. 129 Plaintiffs' Standard Interrogatories
23 to All Defendants as follows:

24 PRELIMINARY STATEMENT

25 Defendant's responses are based upon as diligent and
26 complete an inquiry as possible as of this date and are subject
27 to corrections for errors, mistakes or omissions. Defendant
anticipates that additional discovery, investigation, and

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1 analysis may supply additional facts, add meaning to known facts,
2 or establish new factual and legal contentions. Accordingly, the
3 responses set forth herein are given without prejudice to
4 Chevron's right to produce evidence of any subsequently
5 discovered facts, writings, or interpretations thereof, or to
6 modify or amend the responses.

7 Chevron objects to each interrogatory to the extent that it
8 seeks information protected from disclosure by the attorney
9 client privilege, the attorney work product doctrine, Code of
10 Civil Procedure section 2018, Code of Civil Procedure section
11 2034, and/or any other applicable privilege. Chevron further
12 objects to each interrogatory to the extent that it seeks
13 disclosure of information which is confidential business,
14 proprietary or trade secret matter.

15 Subject to and without waiving the foregoing objections, all
16 of which are incorporated by reference into each and every
17 response below, Chevron responds as follows:

18 INTERROGATORIES

19 INTERROGATORY NO. 1:

20 IDENTIFY the person verifying these answers on YOUR behalf.

21 RESPONSE TO INTERROGATORY NO. 1:

22 H.P. Walker
23 Assistant Secretary
24 Chevron U.S.A. Inc.
25 575 Market Street
26 San Francisco, California 94105
27 (please contact through undersigned counsel)

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1 INTERROGATORY NO. 2:

2 State the date of first employment with YOU, and the dates
3 and titles of each job position the person verifying these
4 interrogatories has held while employed by YOU.

5 RESPONSE TO INTERROGATORY NO. 2:

6 First date of employment: 1977.

7 1977-1987: Mr. Walker worked for Chevron U.S.A. Inc.
8 and/or other Chevron entities as division manager and held other
9 related titles.

10 1987-present: Assistant Secretary of Chevron U.S.A.
11 Inc.

12 INTERROGATORY NO. 3:

13 State whether or not YOU are a corporation, and if so;
14 state:

15 A. YOUR correct corporate name;

16 B. YOUR state of incorporation;

17 C. The date of YOUR incorporation;

18 D. The address of YOUR principal place of business;

19 E. Whether or not YOU have ever held a certificate of
20 authority to do business in the State of California, and if so,
21 the inclusive dates of any certificate;

22 F. If YOU are wholly owned or the majority interest of YOUR
23 company is owned by another business entity, state the entity's
24 name and principal place of business;

25 G. Whether YOU have any business offices in California, and,
26 if so, YOUR principal place of business in California.

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1 RESPONSE TO INTERROGATORY NO. 3:

2 Yes.

3 A. Chevron U.S.A. Inc. (dba) Chevron Products Company.

4 B. Pennsylvania.

5 C. August 19, 1922.

6 D. 575 Market Street, San Francisco, CA 94105.

7 E. Yes. January 18, 1965.

8 F. Not applicable.

9 G. 575 Market Street, San Francisco, California 94105.

10 INTERROGATORY NO. 4:

11 Have YOU ever been identified, known, or done business under
12 any other name in the State of California?

13 RESPONSE TO INTERROGATORY NO. 4:

14 Yes.

15 INTERROGATORY NO. 5:

16 If your answer to Interrogatory No. 4 is in the affirmative,
17 please state such name or names and the time period during which
18 THIS DEFENDANT was so known or identified.

19 RESPONSE TO INTERROGATORY NO. 5:

20 Standard Oil Company of California was incorporated in
21 Delaware on January 27, 1926. Standard Oil Company of
22 California, Western Operations, Inc., was organized as a Nevada
23 corporation on December 10, 1956. Effective 1/31/62, it was
24 merged into the Standard Oil Company of California and then
25 operated as a division until 12/31/76, with no name change.
26 Although "Inc." was included in the name, it was not a separate
27 corporation but functioned as a division. Chevron U.S.A. Inc.
28 was created effective 1/1/77 and Standard Oil Company of

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1 California made a capital contribution of the division's assets
2 to Chevron U.S.A. Inc. effective that date. Western Operations,
3 Inc. and/or Standard Oil Company of California ran the Richmond
4 Refinery until Chevron U.S.A. Inc. was created. Pursuant to a
5 1985 merger, Chevron U.S.A. Inc. was also formerly known as Gulf
6 Oil Corporation. From 1992 to 1996, Chevron U.S.A. Inc. operated
7 as Chevron U.S.A. Products Company, and as Chevron Products
8 Company from 1996 to the present as to the Richmond Refinery.

9 INTERROGATORY NO. 6:

10 If YOU are not a corporation, what is YOUR business
11 structure (partnership, joint venture, sole proprietorship,
12 etc.).

13 RESPONSE TO INTERROGATORY NO. 6:

14 Not applicable. Please see response to Interrogatory No. 3.

15 INTERROGATORY NO. 7:

16 If YOU are not a corporation, please IDENTIFY all persons or
17 other entities with an ownership interest in YOU.

18 RESPONSE TO INTERROGATORY NO. 7:

19 Not applicable. Please see response to Interrogatory No. 3.

20 INTERROGATORY NO. 8:

21 If you are not a corporation, please state the following:

22 A. The address where the HISTORICAL RECORDS of THIS
23 DEFENDANT are currently located; and

24 B. The name, job title and current address of the Custodian
25 for THIS DEFENDANT'S HISTORICAL RECORDS.

26 As used herein, "HISTORICAL RECORDS" shall include all
27 DOCUMENTS relating to the formation of THIS DEFENDANT, all
28 minutes of partners', general partners', or other owners'

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1 meetings, and all DOCUMENTS relating to THIS DEFENDANT's merger
2 with, acquisition of or purchase, or sale of or by any other
3 COMPANY.

4 RESPONSE TO INTERROGATORY NO. 8:

5 Not applicable. Please see response to Interrogatory No. 3.

6 INTERROGATORY NO. 9:

7 IDENTIFY YOUR custodian of Business Records.

8 RESPONSE TO INTERROGATORY NO. 9:

9 Chevron has offices located in many states. Business
10 records are located in many of these offices. Without greater
11 specificity as to the nature of the business records sought,
12 Chevron is unable to provide a Custodian of Business Records or a
13 location of these records. Subject to the foregoing statement,
14 documents which Chevron believes to be responsive to these
15 interrogatories are maintained by Steve A. Cavazos, who may be
16 contacted through the undersigned counsel of record.

17 INTERROGATORY NO. 10:

18 IDENTIFY the person or persons most knowledgeable about:

19 A. YOUR acquisition of RAW ASBESTOS and/or ASBESTOS
20 CONTAINING PRODUCTS;

21 B. YOUR use of RAW ASBESTOS and/or ASBESTOS CONTAINING
22 PRODUCTS;

23 C. YOUR contracting with others to do work involving use or
24 handling of RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS.

25 RESPONSE TO INTERROGATORY NO. 10:

26 A-B. Chevron has no one person who is most knowledgeable
27 regarding its acquisition and/or use of RAW ASBESTOS and/or
28 ASBESTOS CONTAINING PRODUCTS. Any RAW ASBESTOS acquired by

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1 Chevron would have been for use in the manufacture of certain
2 coating products which was discontinued in 1984. Chevron does
3 not currently employ any person who would be most knowledgeable
4 about the acquisition of RAW ASBESTOS for use in its former
5 manufacture of such coating products.

6 As to ASBESTOS CONTAINING PRODUCTS, Chevron has employed
7 personnel whose responsibilities may have included the
8 acquisition of ASBESTOS CONTAINING PRODUCTS for Chevron's various
9 areas of operations. Chevron's primary business operation is and
10 always has been the exploration, production, transportation,
11 refining and marketing of petroleum products. It is likely that
12 the use of products which contained asbestos occurred as a result
13 of work performed by contractors who would have supplied the
14 products used. Consequently, Chevron is unable to name a
15 particular person or defined group of people to designate as a
16 "person most knowledgeable" about its acquisition and/or use of
17 ASBESTOS CONTAINING PRODUCTS.

18 C. Chevron has employed numerous personnel whose
19 responsibilities, at least at some time, may have included
20 contracting for work involving the use and/or handling of RAW
21 ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS for Chevron's
22 various areas of operations. Consequently, Chevron is unable to
23 name a particular person or defined group of people to designate
24 as a "person most knowledgeable" about its contracting operations
25 during the relevant time period.

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1 INTERROGATORY NO. 11:

2 For DEFENDANTS involved in the MARKETING of ASBESTOS
3 CONTAINING PRODUCTS, state the IDENTITY of physicians, medical
4 directors and/or industrial hygienists employed by YOU during the
5 time frame or prior to the time YOU discontinued the marketing of
6 such products. All other DEFENDANTS need only respond as to
7 medical directors and/or industrial hygienists or physicians
8 employed in the area of employee health and safety. PREMISES
9 owners and domestic corporations need only respond as to the
10 United States.

11 RESPONSE TO INTERROGATORY NO. 11:

12 Industrial Hygienists: S. Dryden,
13 S.H. Judd and
J.A. Spence

14 Medical Directors: R.E. Swencicki

15 Chevron requests that the above persons be contacted through
16 the undersigned counsel of record.

17 INTERROGATORY NO. 12:

18 Has any employee of THIS DEFENDANT testified by deposition
19 or at trial on behalf of THIS DEFENDANT in a third party case, in
20 which THIS DEFENDANT was a party, wherein the plaintiff has
21 alleged an asbestos related injury? If so, for each such third
22 party case (except that Premises Defendants and Contractor
23 Defendants need answer only with respect to cases relating to
24 sites within the GEOGRAPHIC AREA) please state:

25 A. The caption and case number;

26 B. The court filing including state and county;

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- 1 C. The date of deposition or trial testimony;
2 D. The name and address of plaintiff's counsel of record;
3 E. The name and address of the court reporter.

4 RESPONSE TO INTERROGATORY NO. 12:

5 Chevron is aware of the following employee depositions
6 as to the Richmond Refinery:

- 7 William M. Alberigi
8 A. Harvey Steele v. Johns-Manville Corporation, et
9 al. Contra Costa Superior Court Case No.: 167271.
10 B. Contra Costa County, California
11 C. March 12, 1980.
12 D. George W. Kilbourne, Esq.
13 70 Doray Drive
Pleasant Hill, CA 94523
14 E. Valerie L. Chedwick, CSR# 3081
15 Aiken & Cistaro
16 1404 Franklin Street
17 Oakland, CA 94612

- 18 Kenneth T. Clapp
19 A. In Re: Brayton 11:
20 Boone, Glen v. Abex Corporation, et al.
21 San Francisco Superior Court Case No.: 910118
22 Dennis, Harold v. Abex Corporation, et al.
23 San Francisco Superior Court Case No.: 902130
24 Fairchild, Sycbert Steve and Louise v. Abex
25 Corporation, et al.
26 San Francisco Superior Court Case No.: 925508
27 Gertz, Robert and Marvel v. Abex Corporation, et
28 al.
29 San Francisco Superior Court Case No.: 911716
30 Gray, Michael v. Abex Corporation, et al.
31 San Francisco Superior Court Case No.: 897887
32 B. San Francisco County, California
33 C. February 28, 1992.
34 D. Brayton, Gisvold & Harvey
35 999 Grant Avenue
PO Box 2109
Novato, CA 94948
36 E. Judy L. Macchello, #6060
37 Tooker & Antz
38 131 Steuart Street
39 San Francisco, CA 94105

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John Driscoll

- A. In Re: Complex Asbestos Litigation
San Francisco Superior Court Case No.: 828864
- B. San Francisco County, California
- C. June 6, 1991.
- D. Law Offices of Brayton & Associates
999 Grant Avenue
Novato, CA 94948
- E. Marjorie K. Forman, CSR #2783
Tooker & Antz
131 Steuart Street
San Francisco, CA 94105

Stanley Dryden

- A. In Re: Complex Asbestos Litigation
San Francisco Superior Court Case No.: 828684
- B. San Francisco County, California
- C. September 18, 1991.
- D. Law Offices of Brayton & Associates
999 Grant Avenue
Novato, CA 94947
- E. Frederick R. Tooker, CSR# 890
Tooker & Antz
131 Steuart Street
San Francisco, CA 94105

Stanley H. Judd

- A. Gene G. Blalock and Ellen Marie Blalock v. Raybestos-Manhattan, et al.
San Francisco Superior Court Case No.: 938511
- B. San Francisco County, California
- C. May 20, 1992.
- D. Law Offices of Cartwright, Slobodin, Bokelman, Borowsky, Wartnick, Moore & Harris
101 California Street, 26th Floor
San Francisco, CA 94111
- E. Juliette F. Finley, CSR# 2521
Tooker & Antz
131 Steuart Street
San Francisco, CA 94105

Raymond O. McDown

- A. Harvey Steele v. Johns-Manville Corporation, et al.
Contra Costa Superior Court Case No.: 167271
- B. Contra Costa County, California
- C. May 19, 1980.
- D. Law Office of George W. Kilbourne
70 Doray Drive, Suite 20
Pleasant Hill, CA 94523
- E. Valerie L. Chedwick, CSR# 3081
Aiken & Cistaro
1404 Franklin Street
Oakland, CA 94612

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- 1 Raymond McDown
- 2 A. Corbett C. Redford Sr., and Dorothy M. Redford v.
3 Raybestos-Manhattan, Inc., et al.
4 San Francisco Superior Court Case No.: 937761
5 B. San Francisco County, California
6 C. March 27, 1992.
7 D. Law Offices of Cartwright, Slobodin, Bokelman,
8 Borowsky, Wartnick, Moore & Harris
9 101 California Street, Suite 2600
10 San Francisco, CA 94111
11 E. Renee Sera, CSR# 7435
12 Tooker & Antz
13 131 Steuart Street
14 San Francisco, CA 94105
- 15 Raymond McDown
- 16 A. Warren G. Saylor v. Johns-Manville Sales
17 Corporation, et al.
18 Alameda County Superior Court Case No.: 533245-2
19 B. Oakland, Alameda County, California
20 C. March 21, 1984.
21 D. Law Offices of Steven Kazan
22 171 Twelfth Street
23 Oakland, CA 94612
24 E. Susan Williams, CSR# 4784
25 Aiken & Welch
26 1404 Franklin Street
27 Oakland, CA 94612
- 28 John A. Spence ..
- 29 A. Harold Dennis v. Abex Corporation, et al.
30 San Francisco Superior Court Case No.: 902130
31 B. San Francisco County, California
32 C. November 7, 1991.
33 D. Law Offices of Brayton & Associates
34 999 Grant Avenue
35 Novato, CA 94948
36 E. Cynthia L. Manning, CSR# 7645
37 CalNorth Reporting Service
38 3510 Unocal Place, Suite 111
39 Santa Rosa, CA 95403
- 40 Bill Torchia
- 41 A. In Re: Complex Asbestos Litigation
42 San Francisco Superior Court Case No.: 828864
43 B. San Francisco County, California
44 C. June 6, 1991.
45 D. Law Offices of Brayton & Associates
46 999 Grant Avenue
47 Novato, CA 94948
48 E. Marjorie K. Forman, CSR #2783
49 Tooker & Antz
50 131 Steuart Street
51 San Francisco, CA 94105

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1 INTERROGATORY NO. 13:

2 For each of the following, please state whether, at any time
3 within the time frame or until such time as any defendant which
4 had been engaged in MARKETING RAW ASBESTOS or ASBESTOS CONTAINING
5 PRODUCTS discontinued the MARKETING of such products, THIS
6 DEFENDANT was a member or paid dues for any representative of
7 THIS DEFENDANT (excluding faculty members of educational
8 institutions) to be a member of the following:

9 RESPONSE TO INTERROGATORY NO. 13:

10 Defendant and/or defendant's employees may have at some time
11 been a member or members of one or more of the above-referenced
12 associations or professional organizations. Given the large
13 number of employees employed by defendant during the relevant
14 time period, it is impossible to identify all such memberships.
15 Subject to the foregoing statement, Chevron is presently aware of
16 the following memberships:

17 A. American Conference of Governmental Industrial
18 Hygienists;

19 A. No.

20 B. American Industrial Hygiene Association;

21 B. Yes.

22 C. American Petroleum Institute;

23 C. Yes.

24 D. American Railroad Association;

25 D. No.

26 E. Asbestos Cement Producers Association;

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1 E. No.

2 F. Asbestos Information Association (AIA) (please answer
3 through date of your answers);

4 F. No.

5 G. Asbestos Information Association/North America (AIA/NA)
6 (please answer through date of your answers);

7 G. No.

8 H. Asbestos Textile Institute (ATI);

9 H. No.

10 I. Industrial Hygiene Foundation and/or Industrial Health
11 Foundation (IHF):

12 I. Yes.

13 J. Industrial Mineral Insulation Manufacturers Institute;
14 J. No.

15 K. Magnesia Insulation Manufacturers' Association;
16 K. No.

17 L. Magnesia Silica Insulation Manufacturers Association;
18 L. No.

19 M. Mineral Wool Institute;
20 M. No.

21 N. National Insulation Manufacturers Association (NIMA);
22 N. No.

23 O. National Safety Council;
24 O. Yes.

25 P. New York Academy of Sciences;
26 P. Unknown.

27 Q. Quebec Asbestos Mining Association (QAMA);
28 Q. No.

1 R. Refractories Institute;
2 R. No.
3 S. Safe Building Alliance (please answer through date of
4 your answers);

5 S. No.

6 T. Thermal Insulation Manufacturers Association (TIMA);

7 T. No.

8 U. U.S. Maritime Commission;

9 U. No.

10 V. IDENTIFY any other organizations, associations or
11 groups of manufacturers, miners, distributors, importers,
12 labelers, suppliers, and/or sellers of ASBESTOS CONTAINING
13 PRODUCTS of which THIS DEFENDANT was a member;

14 V. Chevron and/or its employees have been members of
15 various business groups and associations. Chevron is unaware of
16 whether any other members of those organizations may have been
17 manufacturers, miners, distributors, importers, labelers,
18 suppliers, and/or sellers of ASBESTOS CONTAINING PRODUCTS.
19 Consequently, Chevron is unable to identify at this time all of
20 the groups and associations that may be relevant to this
21 Interrogatory. Subject to the foregoing statement, Chevron does
22 not believe it was a member of any organizations, associations or
23 groups who were comprised solely of manufacturers, miners,
24 distributors, importers, labelers, suppliers, and/or sellers of
25 ASBESTOS CONTAINING PRODUCTS.

26 W. IDENTIFY any such representative of THIS DEFENDANT.

27 Chevron is unable to determine the identity of all employees
28 who attended any meetings of the above associations. Chevron is

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1 aware that certain of its personnel attended conferences and
2 meetings of various organizations in an attempt to learn of
3 potential hazards in the workplace.

4 INTERROGATORY NO. 14:

5 For each organization, association or other entity
6 identified in YOUR Response to Interrogatory No. 13, please
7 state:

8 A. The dates during which THIS DEFENDANT was a member;

9 B. The name(s) of any publication(s) received by THIS
10 DEFENDANT from such association or organization;

11 C. The name of any committee or subcommittee of which THIS
12 DEFENDANT was a member, and the dates of such committee or
13 subcommittee membership.

14 RESPONSE TO INTERROGATORY NO. 14:

15 A. American Petroleum Institute: Approximately 1965 to the
16 present.

17 American Industrial Hygiene Association: Dates
18 Unknown.

19 Industrial Hygiene Foundation: 1955-1960.

20 National Safety Council: Dates Unknown.

21 B. Chevron and/or its employees subscribed to and
22 undoubtedly received numerous business, technical and
23 professional publications during the relevant time period. As to
24 this interrogatory, these include, but are not limited to:

25 American Petroleum Institute: Abstracts of Petroleum

26 Refining and Petrochemicals: Abstracts of Refining Patents

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1 C. Membership in committees and/or subcommittees known at
2 this time include the Medical Advisory Committee, the Health &
3 Biological Science Committee and the Industrial Hygiene Committee
4 of the American Petroleum Institute.

5 INTERROGATORY NO. 15:

6 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
7 containing results or conclusions of any studies and/or tests
8 conducted by Bonsib for Standard Oil of New Jersey relating to
9 asbestos exposure in the work place or the human health
10 consequences of exposure to asbestos? If so:

11 A. Either (1) attach all DOCUMENTS evidencing the
12 information sought in this Interrogatory and its subparts to your
13 answers to these Interrogatories, or (2) attach disks containing
14 such data, or (3) describe such DOCUMENTS with sufficient
15 particularity that they may be made the subject of a request for
16 production of documents.

17 B. State the date upon which THIS DEFENDANT first received
18 such DOCUMENTS;

19 C. State the IDENTITY of the custodian of such DOCUMENTS.

20 D. This interrogatory does not apply to DOCUMENTS contained
21 in a library maintained by a DEFENDANT hospital or a DEFENDANT's
22 library providing access to the general public.

23 RESPONSE TO INTERROGATORY NO. 15:

24 Chevron is not aware of having received any such
25 document(s) before 1973.

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1 INTERROGATORY NO. 16:

2 Had THIS DEFENDANT prior to 1973 received a copy or any
3 portion of any studies and/or tests conducted by any insurance
4 company, including but not limited to Metropolitan Life Insurance
5 Company and Aetna Insurance relating to asbestos exposure in the
6 work place or the human health consequences of exposure to
7 asbestos? If so:

8 A. Either (1) attach all DOCUMENTS evidencing the
9 information sought in this Interrogatory and its subparts to your
10 answers to these Interrogatories, or (2) attach disks containing
11 such data, or (3) describe such DOCUMENTS with sufficient
12 particularity that they may be made the subject of a request for
13 production of documents.

14 B. State the date upon which THIS DEFENDANT first received
15 such DOCUMENTS;

16 C. State the IDENTITY of the custodian of such DOCUMENTS.

17 D. This interrogatory does not apply to DOCUMENTS contained
18 in a library maintained by a DEFENDANT hospital or a DEFENDANT's
19 library providing access to the general public.

20 RESPONSE TO INTERROGATORY NO. 16:

21 Chevron is not aware of having received any such document(s)
22 before 1973.

23 INTERROGATORY NO. 17:

24 Had THIS DEFENDANT prior to 1973 received any DOCUMENTS
25 containing results or conclusions of any studies and/or tests
26 conducted by any laboratory, including but not limited to, the

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1 Saranac Laboratory relating to asbestos exposure in the work
2 place or the human health consequences of exposure to asbestos?
3 If so:

4 A. Either (1) attach all DOCUMENTS evidencing the
5 information sought in this Interrogatory and its subparts to your
6 answers to these Interrogatories, or (2) attach disks containing
7 such data, or (3) describe such DOCUMENTS with sufficient
8 particularity that they may be made the subject of a request for
9 production of documents.

10 B. State the date upon which THIS DEFENDANT first received
11 such DOCUMENTS;

12 C. State the IDENTITY of the custodian of such DOCUMENTS.

13 D. This interrogatory does not apply to DOCUMENTS contained
14 in a library maintained by a DEFENDANT hospital or a DEFENDANT's
15 library providing access to the general public.

16 RESPONSE TO INTERROGATORY NO. 17:

17 Chevron is not aware of having received any such document(s)
18 before 1973.

19 INTERROGATORY NO. 18:

20 Had THIS DEFENDANT (except for a defendant that is an
21 educational institution) prior to 1973 ever maintained a library
22 (or libraries) which contained books, articles, periodicals,
23 journals, and/or reference materials that related to the subjects
24 of asbestos, industrial hygiene, medicine, safety and/or
25 occupational disease. If so, state:

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- 1 A. The date each such library was established;
2 B. The location of each such library;
3 C. The IDENTITY of each librarian or other person in charge
4 of such library.

5 RESPONSE TO INTERROGATORY NO. 18:

6 A-C. Chevron did not maintain a particular "library"
7 dedicated in whole or substantial part to the retention of
8 materials related to the subjects of "asbestos exposure,
9 industrial hygiene, medicine, safety, and/or occupational
10 disease" during the relevant time period. There are collections
11 of publications located at various Chevron facilities which
12 relate to the subject matter of the operations of those
13 facilities. In addition, some of Chevron's industrial
14 hygienists, safety officers, and corporate medical directors may
15 have had in their possession various materials relevant to their
16 duties, which may have addressed topics referenced in this
17 Interrogatory.

18 INTERROGATORY NO. 19:

19 With the exception of OSHA compliance, had THIS DEFENDANT
20 (except for a defendant that is an educational institution) prior
21 to 1980 exchanged DOCUMENTS or communicated with any person or
22 other COMPANY expressly regarding the results of tests and/or
23 studies relating to asbestos exposure in the work place or the
24 human health consequences of exposure to asbestos? If so, state:

25 A. Each person or COMPANY with whom the information was
26 exchanged or to whom it was communicated.

27 B. The date(s) of any such exchanges or communications;

28 C. The IDENTITY of the custodian of such DOCUMENTS.

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1 RESPONSE TO INTERROGATORY NO. 19:

2 Defendant objects to this interrogatory to the extent that
3 it calls for information which is protected by the attorney
4 client privilege and the attorney work product doctrine. Without
5 waiving these objections, Chevron is aware of the following non-
6 privileged information:

7 A. Johns-Manville Corporation.

8 B. June 28, 1971.

9 C. The undersigned counsel of record has a copy of
10 the referenced document.

11 INTERROGATORY NO. 20:

12 Has any employee or designee of THIS DEFENDANT testified as
13 a representative of THIS DEFENDANT before the Occupational Safety
14 and Health Administration, the National Institute of Occupational
15 Safety and Health, or any committee or subcommittee of the United
16 States Congress relating to asbestos exposure in the work place
17 or the human health consequences of exposure to asbestos? If so,
18 please state:

19 A. The entity before whom such testimony was given;

20 B. The date(s) and location(s) of such testimony;

21 C. The IDENTITY of the individual(s) who so testified;

22 D. Whether any DOCUMENTS were presented to the entity before
23 which testimony was given;

24 E. Whether copies of DOCUMENTS presented were retained by
25 THIS DEFENDANT and, if so, state the IDENTITY of the custodian of
26 such DOCUMENTS.

27 RESPONSE TO INTERROGATORY NO. 20:

28 Not to the best of Chevron's knowledge at this time.

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1 INTERROGATORY NO. 21:

2 Has THIS DEFENDANT (except for a defendant that is an
3 educational institution) conducted, or caused to be conducted,
4 tests, and/or studies of ambient asbestos dust created during the
5 manufacture, processing and/or assembling for sale of ASBESTOS
6 CONTAINING PRODUCTS? If so, state:

7 A. Each manufacturing facility, including location and
8 address, at which any such test and/or study was conducted;

9 B. The date of each such test and/or study;

10 C. The individual(s) or entity conducting each such test
11 and/or study;

12 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
13 results and/or conclusions of each such study;

14 E. The IDENTITY of the custodian of such DOCUMENTS.

15 RESPONSE TO INTERROGATORY NO. 21:

16 Chevron objects to this interrogatory on the grounds that it
17 seeks information protected from disclosure because it is
18 confidential, proprietary and/or contains trade secret matters.
19 Without waiving this objection, Chevron responds that information
20 responsive to this interrogatory is contained in certain
21 documents, copies of which will be produced to plaintiffs'
22 counsel upon reasonable notice on a one time basis at a mutually
23 convenient time.

24 INTERROGATORY NO. 22:

25 Has THIS DEFENDANT (except for a defendant that is an
26 educational institution) conducted, or caused to be conducted,
27 any tests and/or studies on ambient asbestos dust levels at any

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1 location or job site where ASBESTOS CONTAINING PRODUCTS were
2 installed, utilized or removed? If so, for the first 5 tests
3 and/or studies, state:

4 A. The location, including name and address, at which each
5 such test and/or study was conducted;

6 B. The individual(s) or entity conducting each such test
7 and/or study;

8 C. The date of each such test and/or study;

9 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
10 results and/or conclusions of each such test and/or study;

11 E. The IDENTITY of the custodian of such DOCUMENTS.

12 RESPONSE TO INTERROGATORY NO. 22:

13 The following information is provided as to the first five
14 tests identified to date, although it is unknown whether these
15 tests represent the first five tests performed:

- 16 1. A. R-3580 Reactor, Richmond Refinery.
17 B. A.F. Christopher; Evan O'Reilly.
18 C. 11/3/72.
D. Yes.
E. Undersigned counsel of record.
- 19 2. A. R-3560 and R-3580 Reactor, Richmond Refinery.
20 B. A.F. Christopher; Evan O'Reilly.
21 C. 11/6/72.
D. Yes.
E. Undersigned counsel of record.
- 22 3. A. E-3570A and E-3570B, Richmond Refinery.
23 B. A.F. Christopher; Evan O'Reilly.
24 C. 11/7/72..
D. Yes.
E. Undersigned counsel of record.
- 25 4. A. Area by Channel Street, Richmond Refinery.
26 B. A.F. Christopher; Evan O'Reilly.
27 C. 11/8/72.
D. Yes.
E. Undersigned counsel of record.

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- 1 5. A. Point Orient Wharf, Richmond Refinery.
2 B. A.F. Christopher; Evan O'Reilly.
3 C. 11/16/72.
4 D. Yes.
5 E. Undersigned counsel of record.

6 INTERROGATORY NO. 23:

7 Did THIS DEFENDANT (except for a defendant that is an
8 educational institution) have any laboratory or other similar
9 type of facility anywhere in the United States at which it
10 conducted, or caused to be conducted, any tests and/or studies of
11 ASBESTOS CONTAINING PRODUCTS or RAW ASBESTOS relating to the
12 health consequences of asbestos or the dust generated by any use
13 of asbestos or ASBESTOS CONTAINING PRODUCTS. If so, state:

14 A. The location, including name and address, at which each
15 test and/or study was conducted;

16 B. The individual(s) or entity conducting each such test
17 and/or study;

18 C. The date of each such test and/or study;

19 D. Whether THIS DEFENDANT has any DOCUMENTS containing the
20 results and/or conclusions of each such test and/or study;

21 E. The IDENTITY of the custodian of such DOCUMENTS.

22 RESPONSE TO INTERROGATORY NO. 23:

23 Chevron is unaware of any such tests or studies.

24 INTERROGATORY NO. 24:

25 Has THIS DEFENDANT made available to its employees a medical
26 examination program to determine the absence or presence of
27 asbestos related disease? If so, state:

28 A. Whether chest x-rays or pulmonary function tests were
29 part of such program(s);

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1 B. Whether participation in any such program was a mandatory
2 condition of employment or was voluntary;

3 C. Whether THIS DEFENDANT has DOCUMENTS of such program(s);

4 D. The IDENTITY of the custodian of such DOCUMENTS.

5 RESPONSE TO INTERROGATORY NO. 24:

6 A. Yes.

7 B. Voluntary.

8 C. Chevron objects to this Interrogatory to the extent that
9 it seeks information that may be confidential, privileged,
10 private, or otherwise protected from disclosure. Without
11 waiving this objection, Chevron responds: Yes.

12 D. To the extent that responsive, non-privileged documents
13 exist, Chevron will provide copies to the undersigned counsel of
14 record.

15 INTERROGATORY NO. 25:

16 Prior to 1973, did any person file a Workers' Compensation
17 claim for asbestos related injury against THIS DEFENDANT or
18 against any Workers' Compensation insurance carrier which
19 provided coverage for THIS DEFENDANT? If so, state the total
20 number of such claims and, for the first 20 such claims state:

21 A. The date of such claim;

22 B. The name of the claimant;

23 C. The case number;

24 D. The court in which the claim was filed;

25 E. The IDENTITY of THIS DEFENDANT's custodian of DOCUMENTS
26 evidencing such claims.

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1 RESPONSE TO INTERROGATORY NO. 25:

2 Defendant objects to this interrogatory on the grounds that
3 seeks information that is confidential, privileged and protected
4 from disclosure by the California Constitution, Article I,
5 section 1. Chevron does not index or maintain the information
6 sought by this interrogatory in a manner that would permit it to
7 determine the number and dates of asbestos-related workers'
8 compensation claims made against Chevron. Accordingly, to
9 respond fully to this interrogatory, Chevron would have to
10 conduct a full review of every workers' compensation claim ever
11 filed against it. On this basis, Chevron further objects to this
12 interrogatory on the grounds that it is unduly burdensome.

13 Without waiving this objection, and subject thereto, Chevron
14 states that it is not aware of any workers' compensation claim
15 for asbestos related injury having been filed against it prior to
16 1973.

17 INTERROGATORY NO. 26:

18 Does THIS DEFENDANT have insurance available to cover
19 judgment(s) entered against it in asbestos related personal
20 injury lawsuits? If so, state:

21 A. The name and principal place of business of any insurance
22 carrier who has issued such policy of insurance;

23 B. The number and effective date of each policy;

24 C. The amount(s) of coverage of each policy;

25 D. The applicable dates of coverage.

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1 RESPONSE TO INTERROGATORY NO. 26:

2 Chevron objects to this interrogatory as being unduly
3 burdensome in that it would require Chevron to review every one
4 of its insurance policies to provide responsive information, and
5 there has been no showing that the requested information is
6 necessary or relevant to any potential judgment which may be
7 entered against Chevron in this litigation. Chevron further
8 objects to this interrogatory on the grounds that it seeks
9 information that may be confidential or protected from disclosure
10 by the attorney client privilege and/or attorney work product
11 doctrine. Without waiving these objections, and subject thereto,
12 Chevron does not carry insurance for the claims and injuries of
13 the nature and extent asserted by plaintiffs. Chevron does carry
14 catastrophic liability insurance, but its retention exceeds
15 potential exposure to liability in this lawsuit.

16 INTERROGATORY NO. 27:

17 State whether YOU have controlled, purchased, or in any way
18 acquired any controlling interest in any corporation or business
19 entity which has mined, manufactured, produced, processed,
20 compounded, sold, supplied, distributed and/or otherwise placed
21 RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS in the stream of
22 commerce. If so, state:

23 A. The name and address of said corporation or business
24 entity;

25 B. The dates YOU controlled, purchased or acquired any
26 interest; and

27 C. The nature of the business as it pertains to asbestos.

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1 RESPONSE TO INTERROGATORY NO. 27:

2 A-B. Socotex Company: November 27, 1936-December 15, 1936;
3 Bitumuls Company, Inc.: December 15, 1936-December 28,
4 1936;
5 American Bitumuls Company: December 28, 1936-August 13,
6 1951.
7 Stancal Bitumuls and Asphalt: Exact dates unknown.
8 American Bitumuls and Company: August 13, 1951-July 1,
9 1965.
10 Chevron Oil Company of California: January 3, 1961-
11 December 31, 1976.
12 Chevron Asphalt Company: July 1, 1965-January 1, 1977.
13 Standard Oil Company of California, Western Operations,
14 Inc.: December 10, 1956-February 1, 1962;
15 Western Operations, Inc. of California, a division of
16 Standard Oil Company of California: February 1, 1962-
17 January 1, 1977.

18 C. Chevron has never been involved in the mining or
19 manufacturing of asbestos. Any asbestos used in the
20 manufacturing of any products was provided by outside vendors.
21 Some of the asbestos-containing coating products manufactured by
22 Chevron contained a minimal amount of chrysotile asbestos fiber
23 to increase the durability of the product when exposed to the
24 elements. The fibers were used as a bonding and temperature
25 resistant agent to ensure the structural integrity of the
26 components in which they were used. In each and every case where
27 asbestos fiber was used in a Chevron product, the fibers were
28 completely encapsulated and trapped in a benign matrix when it

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1 entered the stream of commerce. No Chevron product incorporated
2 asbestos as a primary ingredient in the composition of the
3 product. Chevron's asbestos-containing coating products were
4 sold in pre-mixed, liquid form. As such, it was physically
5 impossible for asbestos fibers to escape from the matrix during
6 the installation of the product.

7 INTERROGATORY NO. 28:

8 State whether THIS DEFENDANT, between 1930 and 1985, has
9 ever engaged in the following activities with regard to RAW
10 ASBESTOS, and if so, state the inclusive dates of such activity:

- 11 A. Mining;
- 12 B. Milling;
- 13 C. Supply;
- 14 D. Importing;
- 15 E. Processing;
- 16 F. Distribution;
- 17 G. Marketing;
- 18 H. Sale;
- 19 I. Brokering.

20 RESPONSE TO INTERROGATORY NO. 28:

21 Chevron has not engaged in any of the listed activities.

22 INTERROGATORY NO. 29:

23 If YOUR answer to any of subparts of Interrogatory 28
24 regarding RAW ASBESTOS is in the affirmative, state:

- 25 A. The trade, brand name, and/or generic name of such RAW
26 ASBESTOS milled or MARKETING in any form or quantity between 1930
27 and 1985;

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1 B. The date(s) such RAW ASBESTOS was first placed on the
2 market, including the date(s) such RAW ASBESTOS was first
3 marketed;

- 4 1. On an experimental basis;
5 2. On a test basis;
6 3. For sale.

7 C. The date(s) such RAW ASBESTOS:

- 8 1. Ceased to be produced; or
9 2. Was recalled from the market, if ever.

10 D. A description of the chemical composition of such RAW
11 ASBESTOS, including the type and/or grade of asbestos;

12 E. A description of the physical appearance and nature of
13 such RAW ASBESTOS, including any color coding, distinctive
14 marking and/or logo on the packaging or container;

15 F. A detailed description of the intended use of such RAW
16 ASBESTOS, including any temperature limits for each such use;

17 G. Whether such RAW ASBESTOS was on the U.S. Government's
18 "Qualified Products List," and if so, the inclusive dates it was
19 on such list;

20 H. IDENTIFY to whom such RAW ASBESTOS has, at any time, been
21 sold. As to each such, state:

22 I. Whether any of THIS DEFENDANT's RAW ASBESTOS has, at any
23 time, been sold, shipped, or otherwise distributed, used or
24 installed to or at any COMPANY (including power company or
25 utility), governmental agency or entity, shipyard, distributor,
26 refinery, contractor, supplier, PREMISE owner or occupant, ship
27 owner, or other PREMISE or site in the GEOGRAPHIC AREA and

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1 whether any of THIS DEFENDANT's RAW ASBESTOS has at any time,
2 been sold to any manufacturer, or manufacturing facility, of
3 ASBESTOS CONTAINING PRODUCTS. If so, state:

4 1. The names of each such COMPANY, governmental agency
5 or entity, shipyard, distributor, supplier, manufacturer or
6 refinery;

7 2. The inclusive dates of each such sale, and the
8 amount (quantity) and the trade brand name of such RAW ASBESTOS
9 sold;

10 3. The manner of shipment (e.g. boat, rail, etc.)

11 4. Whether you have any records indicating any such
12 sale or shipment and, if so, the name, address and job
13 classification of each person who currently has possession of
14 such records.

15 5. Either (1) attach all DOCUMENTS evidencing the
16 information sought in this Interrogatory and its subparts to your
17 answers to these Interrogatories, or (2) attach disks containing
18 such data, or (3) describe such DOCUMENTS with sufficient
19 particularity that they may be made the subject of a request for
20 production of documents.

21 RESPONSE TO INTERROGATORY NO. 29:

22 Not applicable. Please see response to Interrogatory No.
23 28.

24 INTERROGATORY NO. 30:

25 Between 1930 and 1985, did YOU ever engage in any of the
26 activities listed below with regard to ASBESTOS CONTAINING
27 PRODUCTS? If so, state the inclusive dates of such activity:

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- 1 A. Supply;
- 2 B. Importing;
- 3 C. Distribution;
- 4 D. Marketing;
- 5 E. Sale;
- 6 F. Labeling;
- 7 G. Manufacturing;
- 8 H. Brokering.

9 RESPONSE TO INTERROGATORY NO. 30:

- 10 A. Yes.
- 11 B. No.
- 12 C. Yes.
- 13 D. Yes.
- 14 E. Yes.
- 15 F. Yes.
- 16 G. Yes.
- 17 H. No.

18 Please see defendant's response to Interrogatory No. 31
19 regarding specific dates.

20 INTERROGATORY NO. 31:

21 If your answer to any subpart of Interrogatory No. 31
22 regarding "ASBESTOS CONTAINING PRODUCTS" is in the affirmative,
23 state:

24 A. The trade, brand name, and/or generic name of each such
25 ASBESTOS CONTAINING PRODUCT MARKETED in any form or quantity
26 between 1930 and 1985;

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1 B. The date(s) each such ASBESTOS CONTAINING PRODUCT was
2 first placed on the market, including the date(s) each such
3 ASBESTOS CONTAINING PRODUCT was first MARKETED;

- 4 1. On an experimental basis;
5 2. On a test basis; or
6 3. For sale.

7 C. The date(s) each such ASBESTOS CONTAINING PRODUCT:

- 8 1. Ceased to be produced; or
9 2. Was recalled from the market, if ever.

10 D. A detailed description of the chemical composition of
11 each such ASBESTOS CONTAINING PRODUCT, including the type and/or
12 grade of asbestos and/or asbestos fiber contained in each such
13 product and the quantitative percentage of asbestos or asbestos
14 fiber in each such product, and all non-asbestos components of
15 the ASBESTOS CONTAINING PRODUCT, and if the chemical composition
16 changed over time, the inclusive dates of each formulation;

17 E. A description of the physical appearance and nature of
18 each such ASBESTOS CONTAINING PRODUCT, including any color
19 coding, distinctive marking and/or logo, either on the product or
20 on the packaging;

21 F. A detailed description of the intended use of each such
22 ASBESTOS CONTAINING PRODUCT, including any temperature limits for
23 each such use;

24 G. Whether any such ASBESTOS CONTAINING PRODUCT was on the
25 U.S. Government's "Qualified Products List," and if so, the
26 inclusive dates it was on such list;

27 H. The name and address of the supplier of the RAW ASBESTOS
28 used in each such product and the time period of such supply;

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1 I. Whether any of THIS DEFENDANT'S RAW ASBESTOS OR ASBESTOS
2 CONTAINING PRODUCTS have, at any time, been sold, shipped, or
3 otherwise distributed to any COMPANY (including power company or
4 utility), governmental agency or entity, shipyard, distributor,
5 refinery, contractor, supplier, manufacturer, PREMISE owner or
6 occupant, ship owner, or other PREMISE or site in the GEOGRAPHIC
7 AREA. If so, state:

8 1. The names of each such COMPANY, governmental agency
9 or entity, shipyard, distributor, supplier, manufacturer,
10 refinery, contractor, PREMISE owner or occupant, ship owner,
11 PREMISE or site;

12 2. The inclusive dates of each such sale, shipment,
13 distribution, use or installation and the amount (volume) and the
14 trade or brand name of each such ASBESTOS CONTAINING PRODUCT
15 sold;

16 3. Whether you have any records indicating any such
17 sale, shipment, distribution, use or installation and, if so, the
18 name, address and job classification of each person who currently
19 has possession of such records.

20 J. Either (1) attach all DOCUMENTS evidencing the
21 information sought in this Interrogatory and its subparts to your
22 answers to these Interrogatories, or (2) attach disks containing
23 such data, or (3) describe such DOCUMENTS with sufficient
24 particularity that they may be made the subject of a request for
25 production of documents.

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1 RESPONSE TO INTERROGATORY NO. 31:

2 A. To the best of Chevron's knowledge, three of its
3 asbestos-containing coating products were used at the Richmond
4 Refinery during the relevant time period: Chevron Asbestos Roof
5 Coating, Chevron Aluminum Asbestos Coating, and Weathercoat
6 (formerly known as Laykold Weathercoat) (hereinafter collectively
7 referred to as the "three products" or the "three asbestos
8 products.")

9 B. 1. Not applicable for all three asbestos
10 products.

11 2. Chevron Asbestos Roof Coating was tested and
12 approved in 1934.

13 Chevron Aluminum Asbestos Coating was first tested
14 in 1945.

15 Weathercoat: Dates unknown.

16 3. Chevron Asbestos Roof Coating was first sold
17 in 1940.

18 Chevron Aluminum Asbestos Coating was first sold
19 in 1947.

20 Weathercoat was first manufactured and sold in the
21 1940's. The specific date is unknown at this time.

22 C. 1. Chevron Asbestos Roof Coating was last sold in
23 approximately 1984.

24 Chevron Aluminum Asbestos Covering was last sold
25 in approximately 1985.

26 Weathercoat was last sold in approximately 1982.

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1 2. Not applicable.

2 In addition, the following products contained asbestos
3 but were not used at the Richmond Refinery, nor have they been
4 the subject of any asbestos personal injury lawsuit filed against
5 Chevron in this jurisdiction:

6 Standard Plastic Cement Heavy from approximately 1947
7 to approximately 1952.

8 Chevron Blind Nail Cement from approximately 1968 to
9 approximately 1982.

10 Chevron Colorcast Base from approximately 1978 to
11 approximately 1982.

12 Chevron Colorcoat 200 from about 1962 to approximately
13 1982.

14 Dry Turf Premix from approximately 1969 to
15 approximately 1973.

16 Chevron Coating Dry Turf from approximately 1969 to
17 approximately 1973.

18 Chevron Fibrated Clay Emulsion from approximately 1951
19 to approximately 1982.

20 Chevron Fibrecoat from approximately 1948 to
21 approximately 1982.

22 Chevron Grasstex Surfacing Compound from approximately
23 1948 to approximately 1982.

24 Chevron Grasstex Surfacing Compound (Rubberized) from
25 approximately 1965 to approximately 1982.

26 Laykold Heavy Duty Color from approximately 1962 to
27 approximately 1966.

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1 Chevron Heavy Duty Resurfacer from approximately 1961
2 to approximately 1973.

3 Chevron Plastic Cement from approximately 1961 to
4 approximately 1982.

5 Step Grip from approximately 1952 to approximately
6 1960.

7 Chevron Tennis Top-3000 from approximately 1976 to
8 approximately 1982.

9 Chevron Tile Set (Cutback) from approximately 1956 to
10 approximately 1976.

11 Chevron Walk Top Surfacing Compound Black from
12 approximately 1961 to approximately 1982.

13 Chevron Walk-Top Surfacing Compound Red from
14 approximately 1961 to approximately 1982.

15 Chevron Walk-Top Surfacing Compound Green from
16 approximately 1961 to 1982.

17 Chevron Wet Patch from approximately 1967 to
18 approximately 1982.

19 D. Defendant objects to this subparagraph to the extent
20 that it seeks disclosure of confidential, proprietary and/or
21 trade secret information regarding the chemical formulation of
22 its products. Without waiving these objections, defendant
23 responds that none of the three products contained unbound,
24 individual or friable asbestos fibers. The fibers were used as a
25 bonding and temperature resistant agent to ensure the structural
26 integrity of the surrounding components. In each and every case
27 where asbestos fiber was used in a Chevron product, the fibers
28 were completely encapsulated and trapped in a benign matrix when

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1 it entered the stream of commerce. No Chevron product
2 incorporated asbestos as a primary ingredient in the composition
3 of the product. These coating products were sold in pre-mixed,
4 liquid form. As such, it was physically impossible for asbestos
5 fibers to escape from the matrix during the installation of the
6 product.

7 To the extent that this interrogatory seeks non-proprietary
8 information, defendant further responds as follows:

9 1. Chevron Asbestos Roof Coating was manufactured
10 under two formulas which contained 8% and 9% asbestos fibers by
11 mass, respectively. Asbestos fiber content ranged in the various
12 formulations from 7% to 11%. During the relevant time period,
13 the various formulations have included the following types and
14 grades of chrysotile asbestos fiber:

- 15 (1) 1930 to 1948: Philip Carey 3x (7% to 9%)
16 (2) 1948 to 1949: Philip Carey 3X (7% to 10.2%)
17 (3) 1950 to 1954: JM (Johns-Manville) 6D (9%)
18 (4) 1955 to 1956: JM 7M06 (9%)
19 (5) 1957 to 1975: JM 7R05 (11%)
20 (6) 1976 to 1978: JM 7R05 (8%)
21 (7) 1979 to 1980: Calidiria HPO (Union Carbide)
22 (11%) and Calaveras 7R (9%) and
23 (8) 1981 to approximately 1982: JM 7R05 (8%) and
24 Calaveras 7R (9%).

25 2. Chevron Aluminum Asbestos Coating was manufactured
26 under two formulas, each of which contained 9% asbestos fiber by
27 mass. The asbestos fiber content ranged from 6% to 10.6%.

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1 During the relevant time period, the various formulations have
2 included the following types and grades of asbestos fiber:

- 3 (1) 1947 to 1949: Philip Carey 3X (6% to 7.2%);
- 4 (2) 1951 to 1953: JM 6D-20 (7.5%)
- 5 (3) 1954 to 1956: JM 7M06 (7.5%)
- 6 (4) 1957 to 1975: JM 7R05 (10.6%)
- 7 (5) 1976 to 1978: JM 7R05 (9%)
- 8 (6) 1979 to 1980: Calidiria HPO (9%); and
- 9 (7) 1981 to approximately 1982: JM 7R05 (9%)

10 3. Weathercoat was manufactured under a formula that
11 contained 15% asbestos fiber by mass. Historically, Johns-
12 Manville asbestos fiber (JM 7M05) was used in the formulation.
13 Calidiria HPO and Calaveras 7R were also approved for use.

14 E. Asbestos Roof Coating was a heavy black liquid that
15 weighed 8.4 pounds per gallon. Aluminum Asbestos Coating was a
16 heavy gray liquid with a gel consistency that weighed 9.5 pounds
17 per gallon. Weathercoat was a black or dark brown, viscous
18 material of easy toweling consistency.

19 F. The products were intended for use as coatings to a
20 maximum temperature limit of approximately 200° F.

21 G. Unknown.

22 H. Please see response to subparagraphs B, C and D.

23 I. (1)-(3). Chevron does not have records of sales,
24 shipment, or distribution of the above-referenced products,
25 although it is in possession of certain records which indicate
26 where such products may have been used.

27 J. Chevron will provide copies of responsive, non-
28 privileged documents to the undersigned counsel of record.

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1 INTERROGATORY NO. 32 (PREMISES DEFENDANTS only)

2 Did YOU install, remove, or handle or contract to have
3 others install, remove, or handle RAW ASBESTOS or ASBESTOS
4 CONTAINING PRODUCTS at any PREMISES in the GEOGRAPHIC AREA which
5 PREMISES is at issue as to YOU in San Francisco Superior Court
6 asbestos litigation as of the date of your answers to these
7 interrogatories? If so:

8 A. IDENTIFY the PREMISES.

9 B. For each of the PREMISES:

10 1. State the nature of your ownership or possessory
11 interest;

12 2. State the inclusive date of that interest;

13 3. IDENTIFY the party from whom that interest was
14 acquired;

15 4. IDENTIFY the party, if any, to whom that interest
16 was transferred.

17 C. IDENTIFY every contract to which YOU were a party or of
18 which you have knowledge wherein the performance of such contract
19 involved the installation, removal, disturbing or handling of any
20 RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS at YOUR PREMISES.

21 For each such contract:

22 1. IDENTIFY the parties to the contract;

23 2. Provide a general description and specific location
24 of the work to be performed by each party to the contract;

25 3. IDENTIFY and describe the NATURE of the RAW
26 ASBESTOS or ASBESTOS CONTAINING PRODUCTS installed, removed,
27 disturbed or handled in the performance of the contract;

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1 4. State the dates of the contract and the dates of
2 performance;

3 D. Except as provided in response to subpart (c), has any
4 work other than routine maintenance been done on or to the
5 PREMISES that involved the installation, removal, disturbing or
6 handling of RAW ASBESTOS or ASBESTOS CONTAINING PRODUCTS? If so,
7 for each such instance:

8 1. State the inclusive dates of the work;

9 2. Provide a general description and specific location
10 of the work;

11 3. State whether the work was done by YOU and/or YOUR
12 employees;

13 4. IDENTIFY and describe the NATURE of the RAW
14 ASBESTOS or ASBESTOS CONTAINING PRODUCTS installed, removed,
15 handled or disturbed;

16 5. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS
17 CONTAINING PRODUCTS were acquired.

18 E. Has any asbestos abatement effort been made at the
19 PREMISES? If so, for each such effort:

20 1. IDENTIFY who did the work;

21 2. State the inclusive dates thereof;

22 3. State whether samples were taken, and, if the
23 samples still exist, IDENTIFY the custodian of the samples;

24 4. State whether any material was tested, and, if so,
25 what were the results of each test;

26 ///

27 ///

28 ///

1 5. IDENTIFY each test result with sufficient
2 particularity for purposes of a request for production of
3 documents, or, in the alternative, attach a copy to YOUR answers
4 to these interrogatories.

5 F. Except for insurance coverage litigation, have you filed
6 suit against, or otherwise sought to recover from, any person or
7 entity for some or all of the cost of asbestos abatement or for
8 the property damage allegedly caused by the presence of RAW
9 ASBESTOS or ASBESTOS CONTAINING PRODUCTS on the PREMISES
10 identified in response to subpart (A) above? If so:

11 1. IDENTIFY the person or entity against whom YOU have
12 filed suit or otherwise sought to recover;

13 2. If YOU have filed suit, state the court in which
14 the action was filed, the date on which it was filed, IDENTIFY
15 all Plaintiffs and Defendants and their counsel of record;

16 3. State whether or not the case has been resolved,
17 and, if so, what was the status or disposition.

18 G. Either (1) attach all DOCUMENTS evidencing the
19 information sought in this Interrogatory and its subparts to your
20 answers to these Interrogatories, or (2) attach disks containing
21 such data, or (3) describe such DOCUMENTS with sufficient
22 particularity that they may be made the subject of a request for
23 production of documents.

24 H. IDENTIFY the person(s) presently most knowledgeable about
25 the information sought in this interrogatory or its subparts.

26 ///

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28 ///

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1 RESPONSE TO INTERROGATORY NO. 32:

2 A. Richmond Refinery, California.^{1/}

3 B. 1. Chevron is the sole owner and operator.

4 2. Throughout relevant time period.

5 3. Not applicable.

6 4. Not applicable.

7 C. 1-4. Chevron entered into numerous contracts for work at
8 the Richmond Refinery during the relevant time period. Some of
9 that work may have involved the installation, removal,
10 disturbance, or handling of products which contained asbestos.
11 Chevron is in possession of contract documents for work at its
12 facilities within the GEOGRAPHIC AREA which may be responsive to
13 this interrogatory. Chevron is unable to determine at this time,
14 however, the extent to which the work that it contracted for
15 during the relevant time period involved ASBESTOS CONTAINING
16 PRODUCTS without reviewing each and every contract document in
17 its possession. On that basis, Chevron objects to this
18 interrogatory as unduly burdensome. In addition, Chevron may
19 have previously disposed of some of the requested information and
20 documents in accordance with its document retention policy.

21 Without waiving the foregoing objection, to the best of
22 Chevron's knowledge based on the present state of its records,
23 the following contractors who performed pipe insulation or boiler
24 work at the Richmond Refinery include, but may not be limited to
25 the following:

26 _____
27 ^{1/} Chevron has been sued as a premises owner in asbestos litigation in
San Francisco Superior Court with respect to its Richmond Refinery.
The majority of claims filed against it involve this facility,
although there are occasional claims made as to other Chevron
facilities. Chevron's response here concerns the Richmond Refinery.

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	<u>CONTRACTOR</u>	<u>START DATE</u>	<u>COMPLETION DATE</u>
1			
2	Associated Insulation of	05-10-66	07-01-66
3	California		
4	Associated Insulation of	07-18-66	08-01-66
5	California		
6	Armstrong Contracting and Supply Corporation	05-23-66	06-10-66
7	Conseco, Inc.	06-13-69	06-13-72
8	Conseco, Inc.	05-15-66	05-15-69
9	Conseco, Inc.	01-25-66	01-25-69
10	Charles Ayers Company	12-16-60	12-20-60
11	Labor Force, Inc.	06-30-66	06-30-69
12	California Steel Tank Co.	03-18-66	04-01-67
13	California Steel Tank Co.	05-11-66	06-30-66
14	The Babcock and Wilbey Company Boiler Division, Westcoast CP.	11-30-65	11-30-65
15	Western MacArthur Company	12-04-70	12-13-70
16	Pacific Mechanical Corporation	12-14-70	01-31-71
17	Plant Asbestos Company	12-07-70	12-11-70
18	Richardson Chemical Cleaning	01-18-71	01-29-71
19	C. Norman Peterson Company	02-08-71	02-15-71
20	Delta-Tech Service, Inc.	10-08-71	10-11-71
21	Delta-Tech Service, Inc.	10-21-71	10-22-71
22	Richardson Chemical Cleaning Service, Inc.	10-28-71	10-31-71
23			
24	Baldwin-Warren Company	03-28-66	05-11-66
25	Baldwin-Ehret-Hill, Inc.	12-15-65	12-17-65
26	MGM Construction Company	05-09-66	07-01-66
27	MGM Construction Company	03-22-66	04-25-66
28	MGM Construction Company	12-20-65	01-19-66

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1	Labor Force, Inc.	09-01-69	09-01-72
2	Bechtel Corporation	04-09-62	08-31-62
3	Baldwin-Warren Co.	05-09-66	06-24-66
4	D.W. Nicholson Corporation	10-17-66	10-31-66
5	Dow Industrial Service	05-22-65	05-24-65
6	Dow Industrial Service	12-18-65	12-18-65
7	Dow Industrial Service	02-08-61	02-09-61
8	Rosendahl Corporation	09-09-63	09-20-63
9	Rosendahl Corporation	05-07-62	06-15-62
10	Rosendahl Corporation	06-06-71	07-10-61
11	Rosendahl Corporation	04-26-61	05-31-61
12	Rosendahl Corporation	03-15-61	05-03-61
13	Associated Insulation of California	09-01-69	07-31-70
14	Associated Insulation of California	03-20-69	08-01-69
15	Associated Insulation of California		
16	Albay Construction Company	12-24-70	02-15-71
17	Pacific Mechanical Corporation	12-01-66	01-13-67
18	Pacific Mechanical Corporation	05-16-66	06-10-66
19	Pacific Mechanical Corporation	11-12-63	02-18-64
20	Pacific Mechanical Corporation	10-01-63	10-31-63
21	Pacific Mechanical Corporation	01-13-64	02-21-64
22	Plant Asbestos Company	02-03-70	02-22-70
23	Plant Asbestos Company	07-05-67	07-28-67
24	Plant Asbestos Company	02-01-65	02-01-68
25	Plant Asbestos Company	03-01-67	03-01-70
26	Plant Asbestos Company	01-16-67	01-27-67
27	Plant Asbestos Company	06-13-66	06-20-66
28	Plant Asbestos Company	04-01-65	05-01-65

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1	Plant Asbestos Company	01-20-66	02-04-66
2	Plant Asbestos Company	06-10-63	06-21-63
3	Plant Asbestos Company	05-31-63	06-14-63
4	Plant Asbestos Company	05-27-63	06-03-63
5	Plant Asbestos Company	05-13-63	05-20-63
6	Plant Asbestos Company	02-18-63	03-18-63
7	Plant Asbestos Company	01-28-63	03-01-63
8	Plant Asbestos Company	02-04-63	02-22-63
9	Plant Asbestos Company	02-01-63	03-01-63
10	Plant Asbestos Company	12-03-62	01-11-63
11	Plant Asbestos Company	12-05-61	12-13-61
12	Plant Asbestos Company	07-10-61	07-28-61
13	Plant Asbestos Company	09-28-60	10-14-60
14	Western Asbestos Company	12-10-62	01-11-62
15	Western Asbestos Company	07-09-62	03-03-62
16	Fiberglas Engineering and Supply Division, Owens-Corning Fiberglas Corporation	04-04-66	05-01-66
17			
18	Fiberglas Engineering and Supply Division, Owens-Corning Fiberglas Corporation	07-17-61	07-28-61
19			
20			
21	Fiberglas Engineering and Supply Division, Owens-Corning Fiberglas Corporation	12-27-66	01-15-67
22			
23			
24	Elmco Division, Swinerton and Walberg Co.	06-12-69	06-30-69
25	Elmco Division, Swinerton and Walberg Co.	05-31-66	07-01-66
26	Elmco Division, Swinerton and Walberg Co.	05-31-66	07-01-66
27			
28	Ehrhart and Associates, Inc.	01-03-62	02-09-62

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1	Ehrhart and Associates, Inc.	09-18-61	01-15-62
2	Scott Company of California	02-26-70	03-27-70
3	Scott Company of California	09-08-69	10-03-69
4	S and Q Contractors	03-03-69	05-01-69
5	Pacific Mechanical Corporation	04-20-70	06-05-70
6	Pacific Mechanical Corporation	04-15-70	04-30-70
7	Pacific Mechanical Corporation	02-18-70	03-27-70
8	Pacific Mechanical Corporation	07-17-69	08-15-69
9	Pacific Mechanical Corporation	04-04-67	05-05-67
10	C. Norman Peterson Company, Contractors	05-02-66	06-10-66
11	C. Norman Peterson Company, Contractors	07-25-66	08-19-66
12			
13	A.P. Green Services Division, Bigelow-Liptak Corporation	02-09-70	02-18-70
14			

To the best of Chevron's knowledge based on the present state of its records, the following contractors who performed heating, ventilation, sheetmetal, fireproofing, acoustical or plastering work at the Richmond Refinery include, but may not be limited to the following:

	<u>CONTRACTOR</u>	<u>START DATE</u>	<u>COMPLETION DATE</u>
20			
21	United Acoustics	04-17-72	Unknown
22	United Acoustics	04-03-72	Unknown
23	Cooperheat	12-29-71	01-03-72
24	Western MacArthur Company	11-02-71	11-30-71
25	Air Filter Sales and Service Co., Inc.	03-20-71	03-20-72
26			
27	Air Filter Sales and Service Co., Inc.	03-20-70	03-20-71

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1	Associated Insulation of California	05-12-69	05-23-69
2	Associated Insulation of California	05-01-69	05-15-69
3	Associated Insulation of California	06-30-69	07-21-69
4	Associated Insulation of California	07-07-69	07-31-69
5	Associated Insulation of California	05-01-69	05-15-69
6	Associated Insulation of California	01-06-69	02-21-69
7	Associated Insulation of California	07-11-66	07-29-66
8	Associated Insulation of California	11-15-65	12-10-65
9	Associated Insulation of California	12-10-64	12-10-67
10	Armstrong Contracting and Supply Corporation	03-17-67	03-17-68
11	Granholt Sheet Metal Works	09-01-61	09-05-61
12	Associated Insulation of California	05-12-69	05-23-69
13	Pacific Mechanical Corporation	06-16-70	08-14-70
14	Reed and Simonsen	09-09-70	10-30-70
15	Albay Construction Company	12-03-70	12-18-70
16	Simonsen Air Conditioning and Heating	12-14-70	Unknown
17	Mastercraft Tile and Roofing Company	12-01-64	12-01-67
18	Mastercraft Tile and Roofing Company	08-01-67	08-01-70
19	Bechtel Corporation	02-13-61	06-01-62
20	Bechtel Corporation	03-15-61	07-01-61
21	D.W. Nicholson Corporation	03-20-67	04-28-67

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1	Rosendahl Corporation	01-02-62	02-12-62
2	Rosendahl Corporation	Unknown	02-28-62
3	CSB Construction	02-13-68	05-03-68
4	Reed and Simonsen	04-06-70	06-30-70
5	C. Overaa and Company	06-14-71	08-31-71
6	Plant Asbestos Company	08-04-69	09-01-69
7	Plant Asbestos Company	11-28-66	12-07-66
8	Plant Asbestos Company	05-10-65	06-15-65
9	Plant Asbestos Company	01-01-64	01-01-65
10	Plant Asbestos Company	04-01-63	04-19-63
11	Plant Asbestos Company	01-30-63	02-15-63
12	Plant Asbestos Company	12-10-62	01-11-63
13	Plant Asbestos Company	02-01-62	02-01-63
14	Plant Asbestos Company	01-01-61	01-01-62
15	Plant Asbestos Company	01-12-59	01-12-60
16	Plant Asbestos Company	02-01-64	02-01-65
17	Plant Asbestos Company	02-01-63	02-01-64
18	Plant Asbestos Company	02-01-61	02-01-62
19	Plant Asbestos Company	05-28-62	06-01-62
20	Plant Asbestos Company	03-28-62	04-04-62
21	Plant Asbestos Company	02-09-62	03-09-62
22	Plant Asbestos Company	02-26-62	03-05-62
23	Plant Asbestos Company	12-07-60	12-20-60
24	Simonsen Air Conditioning and Heating Company	07-31-72	09-01-72
25	Western Asbestos Company	08-01-66	09-16-66
26	Western Asbestos Company	02-01-65	02-01-68
27	Western Asbestos Company	02-01-64	02-01-65

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1	Western Asbestos Company	04-01-63	04-12-63
2	Western Asbestos Company	06-18-62	06-25-62
3	Western Asbestos Company	05-05-61	05-18-61
4	Western Asbestos Company	01-16-61	01-31-61
5	Western Asbestos Company	09-08-60	09-23-60
6	Western Asbestos Company	01-12-59	02-01-63
7	Western Asbestos Company	02-01-62	02-01-63
8	Western Asbestos Company	02-01-61	02-01-62
9	Western Asbestos Company	06-18-62	06-23-62
10	Western Asbestos Company	02-01-64	02-01-65
11	Western Asbestos Company	02-01-63	02-01-64
12	Fiberglas Engineering and Supply Division,	03-16-66	03-23-66
13	Owens-Corning Fiberglas Corporation		
14	Fiberglas Engineering and Supply Division,	04-15-65	05-01-65
15	Owens-Corning Fiberglas Corporation		
16	Fiberglas Engineering and Supply Division,	06-22-64	06-30-64
17	Owens-Corning Fiberglas Corporation		
18	Fiberglas Engineering and Supply Division,	08-31-64	09-04-64
19	Owens-Corning Fiberglas Corporation		
20	Fiberglas Engineering and Supply Company	02-01-65	02-01-68
21	The Fluor Corporation, Inc.	09-11-61	02-11-62
22	Fiberglas Engineering and Supply Division,	02-15-68	02-15-71
23	Owens-Corning Fiberglas Corporation		
24	///		
25	///		
26	///		
27	///		
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1	Fiberglas Engineering and Supply Division,	06-20-63	06-26-63
2	Owens-Corning Fiberglas Corporation		
3	Fiberglas Engineering and Supply Division,	11-26-62	12-05-62
4	Owens-Corning Fiberglas Corporation		
5	Fiberglas Engineering and Supply Division,	03-18-62	06-29-62
6	Owens-Corning Fiberglas Corporation		
7	Fiberglas Engineering and Supply Division,	05-07-62	05-14-62
8	Owens-Corning Fiberglas Corporation		
9	Fiberglas Engineering and Supply Division,	12-06-61	12-19-61
10	Owens-Corning Fiberglas Corporation		
11	Fiberglas Engineering and Supply Company	01-05-59	01-05-60
12	Fiberglas Engineering and Supply Company	08-29-60	10-01-60
13	Fiberglas Engineering and Supply Division,	06-18-62	06-29-62
14	Owens-Corning Fiberglas Corporation		
15	Fiberglas Engineering and Supply Division,	05-07-62	05-14-62
16	Owens-Corning Fiberglas Corporation		
17	Fiberglas Engineering and Supply Division,	12-06-61	12-19-61
18	Owens-Corning Fiberglas Corporation		
19	Fiberglas Engineering and Supply Company	08-29-60	10-01-60
20	Plant Asbestos Company	11-13-61	11-17-61
21	Fiberglas Engineering and Supply Company	02-01-62	02-01-63
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1	Fiberglas Engineering and Supply Company	02-01-61	02-01-62
2	Fiberglas Engineering and Supply Company	01-05-59	01-05-60
3			
4	Scott Company of California	02-01-70	1974
5	Scott Company of California	1965	1969
6	Scott Company of California	10-22-64	Unknown
7	Scott Company	01-25-63	01-25-64
8	Scott Company	01-25-62	01-25-63
9	Scott Company	01-23-61	01-25-62
10	Scott Company	06-10-63	06-21-63
11	Scott Company	01-15-62	02-15-62
12	C. Overaa and Company	01-06-69	04-01-69
13	C. Norman Peterson Company, Contractors	07-24-68	10-11-68
14			
15	Associated Insulation of California	11-17-72	Unknown
16	Associated Insulation of California	02-01-72	02-11-72

At this time, Chevron identifies the following entities from whom certain asbestos-containing products were acquired for use at the Richmond Refinery: Johns-Manville Sales Corporation; Pabco; Fibreboard Corporation; Pittsburgh-Corning Corp.; Owens-Corning; Raybestos-Manhattan, and others. In addition, the following products were used at the Richmond Refinery and are believed to have contained asbestos at some point in time:

Felt #15 Asphalt - Saturated Asbestos
 Johns-Manville No. 55 Asbestos Base Felt
 Johns-Manville #15 Perforated Asbestos Base Felt
 Two Ply Asbestos Flashing Material
 Standard Aluminum Asbestos Coating
 Asbestile Plastic Cement
 Johns-Manville Asbestile Flashing Cement
 Johns-Manville Asbestile Cement

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- 1 Asbestos Roofing Coating
Johns-Manville J Spray Asbestos
- 2 Corrugated Asbestos Roof and Plastic Skylights
Johns-Manville Transite Corrugated Asbestos Roofing
- 3 AAA Asbestos Cloth
Armstrong Limpet Spray Asbestos
- 4 Laykold Weathercoat
Kaylo Pipe Covering
- 5 Kaylo Block
Asbestos Cement Board
- 6 Thermobestos
Unibestos
- 7 Asbestos Cement Sheets
Asbestos Sponge Felt
- 8

9 D. 1-5. To the best of Chevron's knowledge, information
10 responsive to this interrogatory would likely be contained in its
11 contract records as referenced in response to subpart C. above.
12 At some point in time, Chevron employees may have performed work
13 at the refinery which would have involved the installation,
14 removal, disturbing, use or handling of products which may have
15 contained asbestos, however, Chevron has not located documents
16 which would describe such work.

17 E. 1-5. Chevron has identified the location of asbestos
18 containing products within the Richmond Refinery and has
19 attempted to control exposure to such products by removal or
20 encapsulation in accordance with applicable laws, rules and
21 regulations. Chevron is in the process of reviewing documents in
22 its possession which may be responsive to this interrogatory.

23 F. No.

24 1-3. Not applicable.

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1 G. Chevron is in possession of certain contractor
2 records including contracts, memoranda, and correspondence which
3 may be responsive to this interrogatory and which will be
4 produced to plaintiffs' counsel on a one time basis upon
5 reasonable notice and at a mutually convenient time.

6 H. Chevron's primary business operation is the
7 exploration, production, transportation, refining and marketing
8 of petroleum products. Chevron does not currently employ a
9 particular person or defined group of people presently most
10 knowledgeable about the scope and variety of information
11 requested by this interrogatory during the relevant time period.
12 INTERROGATORY NO. 33 (CONTRACTOR DEFENDANTS only)

13 At any time between 1930 and 1985, did YOU hold a
14 contractor's license in the State of California? If so:

15 A. IDENTIFY each license by type, date and number.

16 B. If on the date of your answers YOU are a defendant in
17 four or more asbestos actions in San Francisco Superior Court,
18 IDENTIFY each job or contract that YOU performed (directly or
19 through one or more subcontractors) during this time period for
20 work in any PREMISES which is at issue as to YOU on such date,
21 and in any PREMISES of 50,000 square feet or more in the
22 GEOGRAPHIC AREA which job or contract involved installation,
23 removal, disturbing or handling RAW ASBESTOS or ASBESTOS
24 CONTAINING PRODUCTS. (Alternatively, at your option, you may
25 IDENTIFY each job or contract YOU performed (directly or through
26 one or more subcontractors) during this time frame for all work,
27 or for all work on PREMISES of 50,000 square feet or more, in the
28 GEOGRAPHIC AREA.) As to each such job or contract:

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1 1. IDENTIFY the location (including name of ship, if
2 applicable) where the job or work was performed;

3 2. State the date of the contract or the inclusive
4 dates of the work;

5 3. IDENTIFY the person or entity with whom you
6 contracted;

7 4. State your job or contract number.

8 C. If on the date of your answers you are not a defendant in
9 four or more asbestos actions in San Francisco Superior Court,
10 IDENTIFY each job or contract that YOU performed (directly or
11 through one or more subcontractors) during this time period for
12 work in any PREMISES which is at issue as to YOU on such date. As
13 to each such job or contract:

14 1. IDENTIFY the location (including name of ship, if
15 applicable) where the job or work was performed;

16 2. State the date of the contract or the inclusive
17 dates of the work;

18 3. IDENTIFY the person or entity with whom you
19 contracted;

20 4. State your job or contract number.

21 RESPONSE TO INTERROGATORY NO. 33:

22 Not applicable.

23 INTERROGATORY NO. 34:

24 Did any of the distributors identified in your Answer to
25 Interrogatory Nos. 29 and 31 above have an exclusive
26 distributorship? If so, state the relevant time period.

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1 RESPONSE TO INTERROGATORY NO. 34:

2 Not applicable; please see defendant's responses to
3 Interrogatory Nos. 29 and 31.

4 INTERROGATORY NO. 35:

5 If THIS DEFENDANT entered into any agreements for the
6 rebranding of any ASBESTOS CONTAINING PRODUCTS by THIS DEFENDANT
7 for resale or distribution by another person or entity, describe
8 each agreement's terms and the parties to said agreement, the
9 duration of the agreement, and name of each product(s) and/or
10 material(s) covered by each such agreement.

11 RESPONSE TO INTERROGATORY NO. 35:

12 Not applicable.

13 INTERROGATORY NO. 36:

14 If THIS DEFENDANT entered into any agreements for the
15 rebranding of ASBESTOS CONTAINING PRODUCTS manufactured, sold,
16 supplied or distributed by another person or entity for resale or
17 distribution by YOU, describe each of the agreements and the
18 parties to said agreement, the terms, the duration, and the names
19 of each product(s) and/or material(s) covered by each such
20 agreement.

21 RESPONSE TO INTERROGATORY NO. 36:

22 At some time between approximately 1984 and 1986
23 Chevron entered into an agreement or agreements for the
24 rebranding of Chevron Asbestos roof Coating, Chevron Aluminum
25 Asbestos Coating and Chevron Plastic Cement manufactured by
26 Gibson-Homans Company to be sold by Chevron.

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1 INTERROGATORY NO. 37:

2 As to RAW ASBESTOS and to each such ASBESTOS CONTAINING
3 PRODUCT listed in YOUR responses to Interrogatories No. 29 and 31
4 did DEFENDANT warn of the health hazards of asbestos? If so,
5 state for each such warning:

6 A. The content, size, color, and location; whether the
7 warning appeared on the material and/or on the container, and/or
8 was placed on a tag; whether the warning was included in
9 contracts; whether the warning was included in advertising or
10 other promotional materials.

11 B. State whether you have any photographs thereof;

12 C. The inclusive dates on which you used each such warning;

13 D. State all changes you made in such warnings and the dates
14 of such changes; and

15 E. Identify the person most knowledgeable about your
16 warnings and warning policy.

17 RESPONSE TO INTERROGATORY NO. 37:

18 Although warnings regarding certain health hazards were
19 placed on labels affixed to the containers for the three asbestos
20 products, there were no warnings specifically referencing
21 asbestos. These products contained a minimal amount of
22 chrysotile asbestos fiber to increase the durability of the
23 product when exposed to the elements. The fibers were used as a
24 bonding and temperature resistant agent to ensure the structural
25 integrity of the surrounding components. In each and every case
26 where asbestos fiber was used in a Chevron product, the fibers
27 were completely encapsulated and trapped in a benign matrix when
28 it entered the stream of commerce. No Chevron product

1 incorporated asbestos as a primary ingredient in the composition
2 of the product. Chevron's asbestos-containing coating products
3 were sold in pre-mixed, liquid form. As such, it was physically
4 impossible for asbestos fibers to escape from the matrix during
5 the installation of the product.

6 INTERROGATORY NO. 38:

7 With respect to each of YOUR ASBESTOS CONTAINING PRODUCTS,
8 state whether THIS DEFENDANT's name, a trademark, logos, color
9 coding, or other identifying markings ever appeared on the actual
10 product itself. If so, IDENTIFY each such product, state when the
11 practice to place such identifying markings upon the product was
12 begun and when it ended, if applicable, and describe in detail
13 the pertinent marking(s) and the purpose, if any, of such
14 markings.

15 RESPONSE TO INTERROGATORY NO. 38:

16 Not applicable.

17 INTERROGATORY NO. 39:

18 Between the years 1930 to 1985, did THIS DEFENDANT purchase
19 or otherwise acquire any ASBESTOS CONTAINING PRODUCT lines from
20 another person or entity? If so, state for each such purchase:

21 A. Date of purchase or acquisition;

22 B. Terms of purchase or acquisition agreement;

23 C. Either (1) attach all DOCUMENTS evidencing said
24 acquisition, or (2) attach disks containing such data, or (3)
25 describe such DOCUMENTS with sufficient particularity that they
26 may be made the subject of a request for production of documents.

27 D. Trade, brand, and/or generic name of each such product
28 line so acquired;

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1 E. Name of the person or entity from whom YOU purchased or
2 acquired each such ASBESTOS CONTAINING PRODUCT line; and

3 F. Location of any manufacturing facilities so acquired, and
4 the type of ASBESTOS CONTAINING PRODUCTS manufactured therein.

5 RESPONSE TO INTERROGATORY NO. 39:

6 Other than as referred to in response to Interrogatory No.
7 27 A. & B., unknown.

8 INTERROGATORY NO. 40:

9 Between the years 1930 to 1985, did THIS DEFENDANT sell any
10 ASBESTOS CONTAINING PRODUCT line to another person or entity? If
11 so, state for each such sale:

12 A. Date of sale;

13 B. Terms of sales agreement;

14 C. Either (1) attach all DOCUMENTS evidencing said sale, or
15 (2) attach disks containing such data, or (3) describe such
16 DOCUMENTS with sufficient particularity that they may be made the
17 subject of a request for production of documents.

18 D. Trade, brand, and/or generic name of each such product
19 line sold;

20 E. Name of person or entity to whom you sold each such
21 ASBESTOS CONTAINING PRODUCTS line; and

22 F. Location of any manufacturing facilities so sold, and the
23 type of ASBESTOS CONTAINING PRODUCTS manufactured therein.

24 RESPONSE TO INTERROGATORY NO. 40:

25 No.

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1 INTERROGATORY NO. 41:

2 IDENTIFY all brochures, pamphlets, catalogs or other
3 advertising relating to ASBESTOS CONTAINING PRODUCTS and/or RAW
4 ASBESTOS which THIS DEFENDANT manufactured, sold, distributed or
5 supplied from the year 1930 to 1985. For each such document,
6 state:

- 7 A. A description of the document;
8 B. The year it was printed;
9 C. The period of time in which it was used;
10 D. The purpose of such document;
11 E. Whether the documents or copies of said documents
12 presently exist;
13 F. If said documents or copies still exist, where they are
14 located; and
15 G. The IDENTITY of the custodian of such documents.

16 RESPONSE TO INTERROGATORY NO. 41:

17 A-G. Chevron will produce responsive, non-proprietary
18 documents to plaintiffs' counsel on a one time basis at a
19 mutually convenient time.

20 INTERROGATORY NO. 42:

21 State if YOU have or had within YOUR corporate or other
22 business structure any CONTRACT UNITS.

23 RESPONSE TO INTERROGATORY NO. 42:

24 No.

25 INTERROGATORY NO. 43:

26 State whether or not any of YOUR CONTRACT UNITS installed
27 and/or removed RAW ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS
28 in the GEOGRAPHIC AREA at any time between 1930 and 1985. If so:

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1 A. State the business addresses and name of the CONTRACT
2 UNIT;

3 B. State the inclusive periods of time the CONTRACT UNITS
4 were working in the GEOGRAPHIC AREA;

5 C. State the name and address of each job site within the
6 GEOGRAPHIC AREA and the dates the CONTRACT UNIT worked at those
7 job sites, and, IDENTIFY the RAW ASBESTOS and/or ASBESTOS
8 CONTAINING PRODUCTS installed or removed on each occasion;

9 D. Either (1) attach all DOCUMENTS evidencing the
10 information sought in this Interrogatory and its subparts to your
11 answers to these Interrogatories, or (2) attach disks containing
12 such data, or (3) describe such DOCUMENTS with sufficient
13 particularity that they may be made the subject of a request for
14 production of documents.

15 RESPONSE TO INTERROGATORY NO. 43:

16 Not applicable. Please see response to Interrogatory No.
17 42.

18 INTERROGATORY NO. 44:

19 When do YOU contend that THIS DEFENDANT first became aware
20 that there is an association between asbestos exposure and
21 disease in human beings?

22 RESPONSE TO INTERROGATORY NO. 44:

23 The medical and scientific knowledge regarding the potential
24 hazards of asbestos exposure in different contexts was developed
25 over many years, and is the subject of expert testimony in this
26 litigation. Accordingly, Chevron objects to this interrogatory
27 to the extent that it seeks information protected from disclosure
28 at this time by Code of Civil Procedure section 2034, the

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1 attorney-client privilege and/or the attorney work product
2 doctrine. Without waiving these objections, Chevron responds
3 that it is not possible to identify a specific time as to when
4 Chevron's awareness of the potential hazards of asbestos exposure
5 occurred, or a specific method or medium by which Chevron
6 acquired knowledge of these various hazards.

7 INTERROGATORY NO. 45:

8 How do YOU contend that THIS DEFENDANT first became aware
9 that there is an association between asbestos exposure and
10 disease in human beings.

11 RESPONSE TO INTERROGATORY NO. 45:

12 The medical and scientific knowledge regarding the potential
13 hazards of asbestos exposure in different contexts was developed
14 over many years, and is the subject of expert testimony in this
15 litigation. Accordingly, Chevron objects to this interrogatory
16 to the extent that it seeks information protected from disclosure
17 at this time by Code of Civil Procedure section 2034, the
18 attorney-client privilege and/or the attorney work product
19 doctrine. Without waiving these objections, Chevron responds
20 that it is not possible to identify a specific time as to when
21 Chevron's awareness of the potential hazards of asbestos exposure
22 occurred, or a specific method or medium by which Chevron
23 acquired knowledge of these various hazards.

24 INTERROGATORY NO. 46:

25 Either (1) attach all DOCUMENTS evidencing the information
26 upon which YOUR contentions in YOUR answers to Interrogatories
27 No. 44 and No. 45 are based, or (2) attach disks containing such

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1 data, or (3) describe such DOCUMENTS with sufficient
2 particularity that they may be made the subject of a request for
3 production of documents.

4 RESPONSE TO INTERROGATORY NO. 46:

5 Chevron acquired its knowledge of potential asbestos
6 hazards over time and through many different sources. It would
7 be impossible for Chevron to identify each and every document
8 and/or source of information which may have contributed to its
9 collective corporate knowledge of these potential hazards.
10 Please see response to Interrogatory Nos. 44 and 45, above.

11 INTERROGATORY NO. 47:

12 When did THIS DEFENDANT first warn its employees that
13 exposure to asbestos could be hazardous to human health? State:

14 A. Whether the first such warning was written or oral;

15 B. Whether copies of DOCUMENTS containing such warning
16 exist;

17 C. The IDENTITY of the custodian of such DOCUMENTS;

18 D. The content of the warning.

19 RESPONSE TO INTERROGATORY NO. 47:

20 A. As the medical and scientific knowledge regarding the
21 potential hazards of asbestos exposure was developed over many
22 years and from many different sources, Chevron cannot identify a
23 specific date when it "first warned its employees that exposure
24 to asbestos could be hazardous to human health."

25 B. Unknown.

26 C. Not applicable.

27 D. Not applicable. See response to subparts A and B,
28 above.

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1 INTERROGATORY NO. 48:

2 Did THIS DEFENDANT ever issue a written COMPANY policy
3 discontinuing warning its employees that exposure to asbestos
4 could be hazardous to human health? If so,

5 A. Provide the date;

6 B. Describe the circumstances; and

7 C. Either (1) attach all DOCUMENTS evidencing the
8 information sought in this Interrogatory and its subparts to your
9 answers to these Interrogatories, or (2) attach disks containing
10 such data, or (3) describe such DOCUMENTS with sufficient
11 particularity that they may be made the subject of a request for
12 production of documents.

13 RESPONSE TO INTERROGATORY NO. 48:

14 No.

15 INTERROGATORY NO. 49 :

16 Did THIS DEFENDANT provide any Independent Contractor or
17 Subcontractor within the GEOGRAPHIC AREA with a written warning
18 that exposure to asbestos could be hazardous to human health.

19 RESPONSE TO INTERROGATORY NO. 49:

20 Yes.

21 INTERROGATORY NO. 50:

22 Has THIS DEFENDANT been cited for or otherwise charged by a
23 public agency with a violation in the GEOGRAPHIC AREA of any
24 statute, ordinance, safety order, regulation, or law pertaining
25 to asbestos exposure? For each occasion, IDENTIFY:

26 A. The code section, safety order, statute, or regulation
27 for which THIS DEFENDANT had been cited or otherwise charged;

28 B. The date(s) thereof.

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1 C. The agency or other governmental unit which issued the
2 citation or otherwise charged YOU.

3 D. All persons known to YOU with information relevant to the
4 incident.

5 E. What was the ultimate resolution.

6 RESPONSE TO INTERROGATORY NO. 50:

7 Chevron objects to this interrogatory to the extent
8 that it seeks information protected from disclosure by the
9 attorney client privilege and the attorney work product doctrine.
10 Without waiving this objection, Chevron responds that it has
11 documents in its possession which may be responsive to this
12 interrogatory and which will be produced to plaintiffs' counsel
13 on reasonable notice on a one time basis and at a mutually
14 convenient time.

15 INTERROGATORY NO. 51:

16 If THIS DEFENDANT has ever owned or operated a railroad,
17 state:

18 A. The IDENTITY of each such railroad, including the name(s)
19 of such railroad during the time period of YOUR ownership and/or
20 operation, the principal place of business of such railroad and
21 the dates of YOUR ownership and/or operation;

22 B. The geographic area of operation of such railroad;

23 C. The name(s) of such railroad prior to YOUR ownership
24 and/or operation;

25 D. The IDENTITY of the person or entity from whom YOU
26 purchased your ownership or operating interest, and the date of
27 such purchase;

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1 E. The IDENTITY of the person or entity to whom YOU sold
2 your ownership or operating interest, and the date of such sale;

3 F. Whether copies of DOCUMENTS evidencing your
4 ownership/operation and/or sale exist;

5 G. The IDENTITY of the Custodian of such DOCUMENTS;

6 H. To the extent that information has not been given in
7 answers to Interrogatory Nos. 32 and 33, the information
8 requested in Interrogatory Nos. 32 and 33, for each railroad
9 owned or operated by YOU.

10 RESPONSE TO INTERROGATORY NO. 51:

11 Not applicable.

12 INTERROGATORY NO. 52:

13 If DEFENDANT has ever owned or operated a shipyard, state:

14 A. The IDENTITY of each such shipyard, including the name(s)
15 of such shipyard during the time period of YOUR ownership and/or
16 operation, the place of business of such shipyard and the dates
17 of YOUR ownership and/or operation;

18 B. The name(s) of such shipyard prior to YOUR ownership
19 and/or operation;

20 C. The IDENTITY of the person or entity to whom YOU sold
21 your ownership or operating interest, and the date of such sale;

22 D. Whether copies of DOCUMENTS evidencing your
23 ownership/operation and/or sale exist;

24 E. Whether any representative of THIS DEFENDANT attended the
25 Maritime Commission Conference in December 1942 in Chicago,
26 Illinois? If so, IDENTIFY any such representative of THIS
27 DEFENDANT;

28 F. The IDENTITY of the Custodian of such DOCUMENTS;

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1 G. To the extent that information has not been given in
2 answers to Interrogatory No. 32, the information requested in
3 Interrogatory No. 32, for each shipyard owned or operated by YOU.

4 RESPONSE TO INTERROGATORY NO. 52:

5 Not applicable.

6 INTERROGATORY NO. 53:

7 At any time between 1930 and 1985, did you import, export,
8 ship, transship or otherwise transport RAW ASBESTOS or ASBESTOS
9 CONTAINING PRODUCTS into, out of or through any port in the
10 GEOGRAPHIC AREA? If so, for each occasion:

11 A. IDENTIFY and describe the NATURE and amount of RAW
12 ASBESTOS and/or ASBESTOS CONTAINING PRODUCTS;

13 B. IDENTIFY the ship or ships (including the owners and
14 operators thereof) onto or from which the RAW ASBESTOS and/or
15 ASBESTOS CONTAINING PRODUCTS were loaded, unloaded or
16 transshipped;

17 C. State the dates, port and pier involved for each
18 occasion;

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1 D. Either (1) attach all DOCUMENTS evidencing the
2 information sought in this Interrogatory and its subparts to your
3 answers to these Interrogatories, or (2) attach disks containing
4 such data, or (3) describe such DOCUMENTS with sufficient
5 particularity that they may be made the subject of a request for
6 production of documents.

7 RESPONSE TO INTERROGATORY NO. 53:

8 Chevron is not aware of any such occasions.

9 Dated: August 22, 1997.

10 SEDGWICK, DETERT, MORAN & ARNOLD

11

12

By



13

Holly A. Harris
Attorneys for Defendant
CHEVRON PRODUCTS COMPANY

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VERIFICATION

I, **Hilman. P. Walker**, declare as follows:

1. I am the Assistant Secretary for Chevron U.S.A. Inc., (of which Defendant Chevron Products Company is a division), and I am authorized to make this verification on its behalf. I have read the foregoing RESPONSES TO PLAINTIFFS' STANDARD ASBESTOS CASE INTERROGATORRIES to all defendants, and know the contents thereof.
2. Certain matters stated in the foregoing answers are not entirely within my personal knowledge. The information provided in the foregoing answers was assembled by authorized personnel and counsel.
3. The answers are given subject to subsequent correction of inadvertent errors or omissions, if such errors or omissions shall later be found to exist. Consequently, Chevron U.S.A. Inc., reserves the right to make any changes in this response, if it appears at any time that inadvertent errors or omissions have been made, or additional or more accurate information becomes available.
4. Subject to the limitations set forth in paragraphs 2 and 3 above, I am informed and believe that the matters in the foregoing answers are true, and on that ground assert that the matters stated are true to the best of my present knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of August, 1997, at San Francisco, California.



Hilman P. Walker

1 IN RE: COMPLEX ASBESTOS LITIGATION
2 San Francisco Superior Court No. 828684

3 CERTIFICATE OF SERVICE BY MAIL
4

5 I, Karin England, declare:

6 I am a resident of the State of California and over the
7 age of eighteen years, and not a party to the within action; my
8 business address is SEDGWICK, DETERT, MORAN & ARNOLD, One
9 Embarcadero Center, 16th Floor, San Francisco, California
10 94111-3765.

11 On August 22, 1997, I served the within:

12 **RESPONSE OF CHEVRON PRODUCTS COMPANY TO PLAINTIFFS'**
13 **STANDARD ASBESTOS CASE INTERROGATORIES TO ALL**
DEFENDANTS

14 by placing a true and correct copy thereof in a sealed envelope,
15 with postage prepaid, addressed as shown below.

16 **See Attached Service List**

17 I am readily familiar with the firm's practice of
18 collection and processing correspondence for mailing. Under that
19 practice, it would be deposited with the U.S. Postal Service on
20 the same day with postage thereon fully prepaid at San Francisco,
21 California, in the ordinary course of business.

22 I declare under penalty of perjury that the foregoing
23 is true and correct. Executed on August 22, 1997, at San
24 Francisco, California.

25
26 

27 Karin England

28 SEDGWICK
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& ARNOLD

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Tel 415 781 7900

IN RE: COMPLEX ASBESTOS LITIGATION
San Francisco Superior Court No. 828684
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