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CHEVRON PRODUCTS COMPANY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

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| IN RE: COMPLEX ASBESTOS LITIGATION | NO. 828684<br>RESPONSES OF DEFENDANT CHEVRON PRODUCTS COMPANY TO PLAINTIFFS' STANDARD INTERROGATORIES TO ALL DEFENDANTS |

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: DEFENDANT CHEVRON PRODUCTS COMPANY

SET NUMBER: GENERAL ORDER 129

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

PRELIMINARY STATEMENT

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

INTERROGATORY NO. 2:

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

RESPONSE TO INTERROGATORY NO. 2:

First date of employment: 1977.

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

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

INTERROGATORY NO. 3:

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

A. YOUR correct corporate name;

B. YOUR state of incorporation;

C. The date of YOUR incorporation;

D. The address of YOUR principal place of business;

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

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

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

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RESPONSE TO INTERROGATORY NO. 3:

Yes.

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

B. Pennsylvania.

C. August 19, 1922.

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

E. Yes. January 18, 1965.

F. Not applicable.

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

INTERROGATORY NO. 4:

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

RESPONSE TO INTERROGATORY NO. 4:

Yes.

INTERROGATORY NO. 5:

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

RESPONSE TO INTERROGATORY NO. 5:

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

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

INTERROGATORY NO. 6:

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

RESPONSE TO INTERROGATORY NO. 6:

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

INTERROGATORY NO. 7:

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

RESPONSE TO INTERROGATORY NO. 7:

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

INTERROGATORY NO. 8:

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

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

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

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

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

RESPONSE TO INTERROGATORY NO. 8:

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

INTERROGATORY NO. 9:

IDENTIFY YOUR custodian of Business Records.

RESPONSE TO INTERROGATORY NO. 9:

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

INTERROGATORY NO. 10:

IDENTIFY the person or persons most knowledgeable about:

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

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

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

RESPONSE TO INTERROGATORY NO. 10:

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

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

INTERROGATORY NO. 14:

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

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

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

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

RESPONSE TO INTERROGATORY NO. 14:

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

American Industrial Hygiene Association: Dates Unknown.

Industrial Hygiene Foundation: 1955-1960.

National Safety Council: Dates Unknown.

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

American Petroleum Institute: Abstracts of Petroleum Refining and Petrochemicals: Abstracts of Refining Patents

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

INTERROGATORY NO. 15:

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

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

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

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

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

RESPONSE TO INTERROGATORY NO. 15:

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

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