

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL
MADISON COUNTY

ROY CARSON, BRUCE LUSK, AND EDWARD MEYERS
WILLIAM ADAMS through LEWIS FLEURY,

Plaintiffs

-vs-

ANCHOR PACKING COMPANY; et al

Defendants

FILED
JUL 17 1987
WILLARD V. FUKIEL
CLERK OF CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

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86-L-1827
through 86-

**PLAINTIFF'S
EXHIBIT**
USG-303

ANSWERS TO PLAINTIFFS' INTERROGATORIES

NOW COMES the Defendant UNITED STATES GYPSUM COMPANY, by HEYL, ROYSTER,
VOELKER & ALLEN, its attorneys, and for their Answers to Plaintiffs'
Interrogatories, states as follows:

INTERROGATORY NO. 1: As to the person answering these interrogato-
ries, state:

- (a) Name;
- (b) Title or position with defendant;
- (c) Business Address;
- (d) Length of time employed by defendant;
- (e) State year by year all other positions, titles or jobs that person has held with the defendant.
- (f) The years during which Defendants have been licensed to do business within the State of Illinois, or State of Missouri and with regard to such years please state:

(1) The type of business conducted within the State of Illinois or State of Missouri;

(2) The names and addresses of any franchise holders, dealers, or customers located in the State of Illinois or State of Missouri during the last three years;

(3) Whether or not Defendant directly or indirectly supplies the persons or entities identified in 1.(f)(2) with any products or services; if so, please describe the relationship between Defendant and those persons or entities and state the approximate dollar value of Defendant's 1930 to present sales to them

- a) United States Gypsum Company
- b) 101 South Wacker Drive, Chicago, IL 60606
- c) Delaware
- d)

<u>Date</u> <u>Incorporated</u>	<u>Date</u> <u>Dissolved</u>	<u>Name</u>	<u>State</u>
12/27/01	8/23/20	United States Gypsum Company	NJ
8/23/20	10/14/27	Avery Gypsum Company	NJ
8/12/20	12/24/36	United States Gypsum Company	IL
12/24/36	8/--/52	United States Gypsum Company	DE
8/--/52	2/04/66	United States Gypsum Company	IL
2/04/66	7/01/66	USG Corporation	DE
7/01/66	--/--/--	United States Gypsum Company	DE

e) This defendant has been authorized to transact business in the State of Illinois since 1933. Such authority was last renewed in 1985.

f) 101 South Wacker Drive, Chicago, Illinois 60606

g) C T Corporation System, 208 South LaSalle Street, Chicago, IL 60604

INTERROGATORY NO. 4: Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 3 above concerning the defendant as correctly names.

ANSWER:

Yes.

INTERROGATORY NO. 5: Has this defendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold, processed, distributed or contracted to apply asbestos products?

ANSWER:

United States Gypsum Company acquired the assets of National Asbestos Manufacturing Company in 1936. National Asbestos Manufacturing Company was located in New Jersey and no longer exists as a corporate entity. Said company was a producer of asbestos-containing pipecovering.

United States Gypsum acquired A. P. Green of Missouri in 1966. A. P. Green is located in Mexico, Missouri, and continues to exist as a separate and independent corporate entity. Said company is primarily a manufacturer of refractory products. A small percentage of the products it manufactured or sold contained asbestos as part of their formulations.

United States Gypsum Company acquired Chicago Mastic Company, a manufacturer of adhesives, in 1971. Said company was acquired by purchase of stock.

INTERROGATORY NO. 6: If the answer to Interrogatory No. 5 is "Yes", then state the following concerning such predecessor:

- (a) Full and correct name;
- (b) The principal place of business;
- (c) State of incorporation;
- (d) Date of acquisition by defendant;
- (e) Was this business authorized to transact business in the State of Illinois?
- (f) Attach copies of all papers pertaining to the acquisition.

ANSWER:

See this defendant's response to Interrogatory No. 5.

INTERROGATORY NO. 7: As to any product containing asbestos in any form, has this defendant, or any predecessor(s):

- (a) Ever designed such a product?
- (b) Manufactured such a product?

See this defendant's response to Interrogatory No. 12.

INTERROGATORY NO. 14: In what year did the defendant first begin selling or distributing any products containing asbestos?

ANSWER:

See attached Exhibit No. 1.

INTERROGATORY NO. 15: In what year did the defendant last sell the any product which contained asbestos?

ANSWER:

This defendant last sold any products which contained asbestos as part of their formulations in 1976.

INTERROGATORY NO. 16: As to the named defendant or any predecessor(s) or acquired business, state the various types of products, such as blocks, pipe covering, cements, tape, spray-on insulation, mastics, and cloth, or any other asbestos containing products and in connection with each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

ANSWER:

See attached Exhibit No. 2.

INTERROGATORY NO. 17: Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any products containing asbestos? If so, give the brand names of such products, the binding material and date first manufactured.

ANSWER:

See this defendant's response to Interrogatory No. 15.

INTERROGATORY NO. 18: Were each of your asbestos containing products generally expected to reach, or were packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Yes.

INTERROGATORY NO. 19: If your answer to Interrogatory No. 18 is "No", with respect to any product, explain in what way the defendant claims its products were altered or substantially changed after sale or distribution and before reaching the helper, mechanic or bystander.

ANSWER:

Not applicable.

INTERROGATORY NO. 20: Based upon the material contents of your products, the method of manufacturing, and the method of application, can your products be generally applied or installed without liberating asbestos fibers?

(a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name.

(b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

ANSWER:

U. S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds. Non-privileged, relevant documents will be made available for plaintiff's inspection at a mutually convenient time through U. S. Gypsum offices at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 21: Was it a foreseeable use of your asbestos containing products that they may have to be removed, stripped or replaced at any time after installation? If your company contends the plaintiff(s)

INTERROGATORY NO. 32: 'Has your company or its predecessor(s) ever conducted any studies concerning the effects of the inhalation of asbestos dust or fibers on one using or being exposed to any of the asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? If answer to this question is "Yes", give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to whom such reports were given, and the date.

ANSWER:

U. S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds.

U. S. Gypsum is aware that it may have contributed to a study conducted approximately 1936 by Dr. Leroy Gardner of the Saranac Laboratory.

Relevant documents relating to the studies referenced above will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 33: Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's asbestos products? If so, give the following:

- (a) Name of the person or firm conducting such studies.
- (b) The date the studies began and the date completed.
- (c) Any publication or dissemination of the results of the studies.
- (d) The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers.
- (e) Attach copies.

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 34: If your answer to Interrogatory No. 33 is

"Yes", state the name and address of such industrial hygienist or hygienists.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 33.

INTERROGATORY NO. 35: Does your company have, has it ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

(a) How much expended each year on research, etc.

(b) What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health affects of asbestos.

ANSWER:

This defendant has has a Research Department since 1921. The Research Department has never operated solely for the research and development of asbestos-containing products. No medical research is performed by this department.

a) Objection. This interrogatory is overbroad in that it is not limited to asbestos, the focus of this litigation. Therefore, this interrogatory is irrelevant and immaterial and will lead to the discovery of no admissible evidence.

b) Objection. This interrogatory is overbroad. This defendant's Research Department, to this defendant's best current knowledge, information and belief, did not conduct research "concerning the health effects of asbestos."

INTERROGATORY NO. 36: Prior to 1965, did your company, or any predecessor(s), ever at any time give persons who would be applying or removing

ANSWER:

Information may have been furnished upon request. This defendant has no further information in answer to this interrogatory.

INTERROGATORY NO. 46: Prior to 1964 did your company or its predecessor(s) ever manufacture products containing asbestos without a warning? List the years.

ANSWER:

Objection. This interrogatory is overbroad in that it is not limited to warnings related to asbestos, the issue relevant to this litigation. However, without waiving said objection, see Exhibit No. 3.

INTERROGATORY NO. 47: After 1964 did you ever manufacture products containing asbestos without a warning? If so, list the name of the product and the years.

ANSWER:

Objection. This interrogatory is overbroad in that it is not limited to warnings related to asbestos, the issue relevant to this litigation. However, without waiving said objection, see Exhibit No. 3.

INTERROGATORY NO. 48: If your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any products containing asbestos? If so, give the brand names of such products and the binding material and dates of first manufacture of such product.

ANSWER:

This defendant, as of the date of answering these interrogatories, is not manufacturing, selling or distributing any products which contain asbestos as part of their formulations.

INTERROGATORY NO. 49: Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of

applying asbestos products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER:

Prior to 1940, a group within U. S. Gypsum's corporate structure was engaged in contracting. It is unknown whether said group formally was a "division" or "unit", as no documents have been located from which to verify this information. U. S. Gypsum has no further information.

INTERROGATORY NO. 50: Did any division of your company or subsidiary company engaged in the contract business of applying asbestos products or your workmen's compensation insurance carrier ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is "Yes", give the name of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER:

See this defendant's response to interrogatory No.49.

INTERROGATORY NO. 51: Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 49.

INTERROGATORY NO. 52: Did your company or its predecessor(s) ever make any industrial hygiene surveys concerning its asbestos products? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER:

As relates to this defendant's asbestos-containing products, not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 53: State the year that this defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advise and attach copies of the instrument communicating such advise.

ANSWER:

United States Gypsum Company understands the term "threshold limit value" to mean a concentration to which nearly all workers can be exposed, day after day, without adverse effect.

This defendant recognizes that The American Conference of Governmental Industrial Hygienists defines "Threshold Limit Values - Time Weighted Average" as the time weighted average concentration for a normal 8-hour work day or 40-hour work week, to which nearly all workers may be repeatedly exposed, day after day, without adverse effect.

This defendant has located no information indicating when it first became aware of the term.

INTERROGATORY NO. 54: Was such threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 53 TOTAL dust and not just asbestos dust?

ANSWER:

MEYL, ROYSTER, VOELKER
& ALLEN
PROFESSIONAL CORPORATION
7 NEYS AT LAW
LOUIS STREET
DWARFVILLE, ILLINOIS 62025
16181 850-4646

See this defendant's response to interrogatory No. 53.

INTERROGATORY NO. 55: State in detail what test, if any, your company ever made with regard to the quantity, quality or threshold limit values or asbestos dust or particles to which applicators or consumers of your product were exposed while using your products containing asbestos.

(a) If there were any such tests or studies, give the name or names of the person(s) conducting the tests, the date of the tests and attach true copies of any reports, findings or memorandums concerning such tests or studies.

ANSWER:

As relates to this defendant's asbestos-containing products, U. S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds.

INTERROGATORY NO. 56: When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other diseases;
- (e) With reference to your company, give the name of such official who first had such knowledge, list them and attach copies.
- (f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

ANSWER:

See attached Exhibit No. 4.

INTERROGATORY NO. 57: Do you have any photographs of the products inquired about above or their packages or containers? If so, please attach exact copies.

United States Gypsum Company has been aware since the mid-1930's that inhalation of large quantities of asbestos fibers for long periods of time could produce a pneumoconiotic lung condition known as asbestosis. United States Gypsum Company is presently unaware of specifically how it acquired this knowledge.

United States Gypsum Company is now aware that a relationship between the inhalation of asbestos fibers and the development of bronchogenic carcinoma became generally recognized in the medical and scientific community in 1949, as evidenced by an editorial on the subject which appeared in that year in the Journal of the American Medical Association.

United States Gypsum Company is not aware of precisely when it first knew of the relationship between the inhalation of asbestos fibers and the development of bronchogenic carcinoma, except that it does know that one of its employees, E. C. Beuthin, United States Gypsum Company's first Safety Director, attended a conference in 1955, at which papers discussing this relationship were presented.

United States Gypsum Company is now aware that the first published study which established a direct association between the inhalation of asbestos fibers and the development of mesothelioma was the 1960 epidemiological study entitled "Diffuse Pleural Mesothelioma and Asbestos Exposure in the North

Western Cape Province" by J. C. Wagner, et al., which described mesothelioma occurrence among persons exposed to crocidolite, at or near crocidolite mines in South Africa.

United States Gypsum Company is not aware of precisely when it first knew of the relationship between the inhalation of asbestos fibers and the development of mesothelioma, except that it believes that the first employee to become aware of this association was G. R. Krug, one of United States Gypsum Company's former Safety Directors. Mr. Krug has testified that he first became aware in the early to mid-1960's of the association between exposure to asbestos fibers and the development of mesothelioma in asbestos miners, as a result of reading articles in newspapers and magazines.

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determine who would have the knowledge of information that plaintiff is seeking.

INTERROGATORY NO. 60: As to each product identified in response to the foregoing interrogatory please indicate:

- (a) The type of asbestos contained in the product as it was first manufactured;
- (b) The percentage of asbestos contained in the product as it was first manufactured;
- (c) Any modifications to the product which altered the percentage or type of asbestos in the product and the dates of such modification;
- (d) The source of asbestos in each product;
- (e) The color, physical characteristics, and appearance of each product;
- (f) A full and complete description of the package in which the product was sold, including, but not limited to, type of package, size, color(s), and writings thereon;
- (g) All other names under which the product was sold;
- (h) The number and date of each patent or patent application as to the product;
- (i) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (j) If the product is no longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the brand name of replacement product, and the date the replacement product first went into production;
- (k) The identity of the custodian, managing agent, or employee who has photographs, drawings, or labels for each product;
- (l) The reasons why asbestos was used as an ingredient in each such product;
- (m) The content of any warning labels, inserts or other writings provided with such product with ever such printed warning, what period of time it has or had accompanied the product, the exact wording of the warning, any amendments made to the the wording, whether the warning was located on each product or packaging -- what asbestos products the warnings appear(ed);

(n) Any special instructions provided with such product regarding the use, protection or safety procedures to be employed by persons handling such product.

ANSWER:

a) Chrysotile was the "type of asbestos" used in virtually all U. S. Gypsum Company products that contained asbestos. U. S. Gypsum now understands that amosite asbestos may have been used as a component ingredient in rigid block insulation for short periods of time.

b) See attached Exhibit No. 5.

c) See attached Exhibit No. 5.

d) The following are known to have been approved suppliers of asbestos: Canadian Johns-Manville, Lake Asbestos of Quebec, Nicolet Industries, Carey Canadian, Asbestos Corporation, Atlas Asbestos, Union Carbide, and Pacific Asbestos. Atlas Asbestos and Pacific Asbestos shipped only to California. United States Gypsum Company also purchased small amounts of asbestos from North American Asbestos for a short period of time. It is unknown which source of supply was used for any particular product, at which mines the raw asbestos was mined, and from which locations the raw asbestos was shipped. U. S. Gypsum has located no documentation to ascertain from which particular supplier asbestos was purchased prior to 1975. For the years 1975 and 1976, U. S. Gypsum has located some records of purchase of asbestos.

e) See attached Exhibit No. 6.

f) See attached Exhibit No. 2.

g) See attached Exhibit No. 1.

h) This defendant does not maintain its patent files in such a manner as would facilitate retrieval of this information. To the extent such information is available to United States Gypsum Company and would not

require it to undertake an unreasonable investigation at an unreasonable cost, it is contained in documents which United States Gypsum Company will provide through its offices at 101 S. Wacker Drive, Chicago, Illinois 60606.

- i) See attached Exhibit No. 7.
- j) See attached Exhibit No. 7.
- k) This defendant's Legal Department.
- l) Asbestos adds body when added to a material and also increases the workability of a material by increasing its water-holding properties.

In addition, asbestos was included in the formulations of some products to increase the fire rating of such products.

- m) See attached Exhibit No. 3.
- n) See attached Exhibit No. 3.

INTERROGATORY NO. 61: With respect to your Answer in Interrogatory No. 60, did you specifically inform the purchaser or user of your products during the same time period that your products were manufactured and sold that such products could cause cancer, asbestosis, and other serious diseases?

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 62: Identify the distribution chain of defendant's asbestos products since 1925 along with any documents evidencing or confirming such chain, including but not limited to distribution from and to other defendants.

ANSWER:

U. S. Gypsum does not possess any records maintained in the normal course of business which identify who the ultimate user of the product was or where it was installed. With that limitation, U. S. Gypsum responds as

PERCENTAGE OF ASBESTOS (VOLUME)ACOUSTICAL PLASTERS
PRODUCTSDATEPERCENT ASBESTOS

SABINITE "TF"	No Change	4.90%
SABINITE "B"	04/18/33	2.00%
	11/03/33	4.00%
SABINITE 38 (HYDRAULIC)	11/10/30	2.40%
	04/18/32	3.00%
	01/13/37	2.00%
	07/12/39	3.00%
SABINITE ACOUSTICAL PLASTER	05/23/30	.98%
	01/01/31	2.50%
	06/29/32	2.00%
	05/03/40	4.00%
SABINITE "M" and SABINITE SPECIAL WHITE	10/18/40	4.00%
	01/23/48	6.30%
SABINITE "F"	02/27/44	4.00%
	07/28/50	3.00%
	07/28/50	4.00%
	09/18/52	3.00%
SABINITE "A" or SABINITE HYDROCAL	04/04/31	4.00%
	04/18/33	2.00%
	11/03/33	4.00%
HI-LITE ACOUSTICAL PLASTER	06/09/53	6.20%
	03/31/55	6.30%
AUDICOTE SPECIAL WHITE	09/15/55	8.25%
	08/24/56	7.62%
	10/31/56	7.60%
	12/14/56	8.00%
	03/27/57	7.70%
	12/02/57	6.95%
	12/02/57	22.50%
	03/10/58	7.10%
	03/27/58	6.95%
	04/04/58	22.50%
	05/16/58	16.89%
	05/29/58	17.09%
	05/29/58	16.89%
	05/29/59	16.88%

ACOUSTICAL PLASTERS
PRODUCTS

	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
	05/29/59	16.93%
	12/06/60	8.33%
	07/14/61	8.46%
	07/06/62	7.63%
	08/07/62	7.65%
	02/05/64	7.64%
	08/11/64	7.63%
AUDICOTE SATIN WHITE	09/15/55	8.43%
	08/24/56	7.78%
	10/31/56	7.76%
	03/27/57	7.47%
	12/02/57	26.24%
	03/10/58	8.06%
	03/27/58	7.47%
	04/04/58	26.24%
	05/16/58	19.66%
	05/29/58	19.49%
	05/29/58	19.66%
	05/29/59	19.22%
	05/29/59	19.70%
	12/06/60	8.60%
	07/14/61	8.73%
	07/06/62	7.85%
	08/07/62	7.87%
	02/05/64	7.86%
	12/22/64	7.85%
RED TOP ACOUSTICAL PLASTER*	04/25/51	9.70%
*SPRAYDON STANDARD A	No Change	29.70%
*SPRAYDON STANDARD G	No Change	7.60%
*SPRAYDON POWERCOTE	No Change	30.00%

* SprayDon - U. S. Gypsum manufactured this product pursuant to the specifications of Sprayon Research Corporation.

<u>TEXTURE PRODUCTS</u>	<u>DATE</u>	<u>PERCENT ASBESTOS</u>
PAC-TEX	1943	4.5
	1953	4.5 - 6.0
	1954	3.5

A-B TEX	1935	4.0
	1943	4.5
	1944	4.0
USG TEXTONE TEXTURE PAINT	1928	3.3 - 4.5
	1930	2.8 - 4.5
	1934	3.3 - 4.5
	1938	2.67 - 5.0
	1943	2.67 - 6.0
	1947	2.67 - 8.0
	1952	2.5 - 3.5
	1955	1.2 - 3.5
	1956	2.3 - 3.5
	1958	1.2 - 6.0
	1960	1.2 - 10.0
	1970	.5 - 10.0
	1971	.5 - 3.5
SPECIAL TEXTURE PAINT	No Change	3.0 - 4.0
SPRAY TEXTURE PAINT	No Change	1.5 - 2.5
IMPROVED SPRAY TEXTURE	No Change	1.5 - 2.5
MULTI-PURPOSE TEXTURE	No Change	6.0 - 10.0
SANDED COLORED TEXTURE PAINT	No Change	2.0 - 4.0
USG MULTI-PURPOSE TEXTURE PAINT	1954	1.0 - 1.4
	1964	6.0 - 10.0
USG TEXTURE PAINT	No Change	2.5
SPRAY TEXTURE PAINT	1966	Unknown
	1968	5.0
	1969	2.0
USG MULTI-PURPOSE SPECIAL WHITE	No Change	5.0
USG MULTI-PURPOSE	No Change	6.0 - 10.0
USG MULTI-PURPOSE	No Change	4.0
SPECIAL TEXTURE PAINT	1956	Unknown
USG MULTI-PURPOSE SPRAY TEXTURE	No Change	4.0

USG MULTI-PURPOSE SPRAY TEXTURE	1972 1973	Unknown 4.0
SPRAY TEXTURE	No Change	1.5 - 2.5
AB TEX TEXTURE PAINT	No Change	.5
AB TEX TEXTURE PAINT	No Change	1.2 - 1.6
USG TEXTURE	No Change	1.6 - 3.5
MULTI-PURPOSE	1971	Unknown
SPRAY TEXTURE PAINT WHITE	1969 1973	7.3 0.0
SPRAY TEXTURE PAINT	1958 1971	1.5 - 3.0 4.5 - 6.0
SPRAY TEXTURE PAINT	No Change	1.5 - 3.0
SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SPRAY TEXTURE	No Change	1.5 - 3.0
SPRAY TEXTURE	No Change	1.5 - 4.0
SIMULATED ACOUSTICAL SPRAY.	No Change	8.0
SIMULATED ACOUSTICAL SPRAY	1961 1962	Unknown 8.0
AGGREGATED SPRAY TEXTURE	No Change	1.0
AGGREGATED SPRAY TEXTURE	1962 1963	1.0 .5 - 1.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.0
"QT" SIMULATED ACOUSTICAL SPRAY	1964 1969 1971	2.0 5.0 4.4
IMPERIAL QT SPRAY	No Change	1.5
AGGREGATED SPRAY	No Change	2.8

IMPERIAL QT REGULAR VERMICULITE	No Change	2.0
SPRAY TEXTURE	No Change	5.0
SMOOTH HARD FINISH	No Change	1.0
IMPERIAL QT TEXTURE	No Change	2.0
USG SUPER HARD SPRAY	No Change	1.2
USG SPRAY TEXTURE	No Change	5.0
SPRAY TEXTURE FINISH	No Change	.1
USG TEXTURE XII	No Change	3.0
USG SPRAY TEXTURE	No Change	5.0
USG TEXTURE XII SUPER VINYL	1971 1972	3.0 Unknown
USG SPRAY TEXTURE FINISH	1971 1974	4.0 5.0
SHEETROCK SMOOTHCOAT	No Change	1.0
USG EXTERIOR TEXTURE WALLBOARD FINISH	No Change	4.0
EXTRA HARD FINE IMPERIAL QT	No Change	1.0 - 3.0
SIMULATED ACOUSTICAL SPRAY TEXTURE	No Change	8.0
SIMULATED ACOUSTICAL SPRAY TEXTURE	No Change	8.0
IMPERIAL QT TEXTURE	No Change	4.0
SIMULATED ACOUSTICAL SPRAY	No Change	6.0
SIMULATED ACOUSTICAL SPRAY	No Change	6.5
SIMULATED ACOUSTICAL SPRAY	No Change	10.0

SIMULATED ACOUSTICAL SPRAY	No Change	8.0
SIMULATED ACOUSTICAL SPRAY	No Change	2.5 - 4.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.5 - 3.5
SIMULATED ACOUSTICAL SPRAY	No Change	2.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	8.0
IMPERIAL QT	No Change	5.0
IMPERIAL QT	No Change	4.0
MULTI-PURPOSE TEXTURE	No Change	2.6
READY-MIXED SIMULATED ACOUSTICAL SPRAY	1966	Unknown
IMPERIAL QT	1966	4.0
IMPERIAL QT	1966	.94 - 1.0
IMPERIAL QT	1966	2.0 - 3.0
IMPERIAL QT	1966	3.0
IMPERIAL QT Polystrene	1966	6.0
SHEETROCK RADIANT HEAT SIMULATED ACOUSTICAL SPRAY	1966	6.0
SHEETROCK SIMULATED ACOUSTICAL SPRAY	1966	2.0
SHEETROCK SIMULATED ACOUSTICAL SPRAY	1966	3.5
AGGREGATED SPRAY TEXTURE	1966	5.0
IMPERIAL QT REGULAR	1967	Unknown
IMPERIAL QT REGULAR	1967	8.0
NC-4	1968	6.0

IMPERIAL QT	No Change	2.0
USG SPRAY TEXTURE FINISH	1965	.5
USG SPRAY TEXTURE FINISH	1965	.5
XH WHITE	1968	.5 - 1.5
AGGREGATED SPRAY TEXTURE	No Change	1.0
IMPERIAL QT	No Change	2.0
IMPERIAL QT	No Change	4.0
IMPERIAL QT COARSE VERMICULITE	No Change	2.0
IMPERIAL QT COARSE VERMICULITE	1970 1971	5.1 6.1
USG SPRAY TEXTURE R	No Change	1.5
USG CONCRETE CEILING TEXTURE	No Change	6.0
TEXTONE TEXTURE FINISH	1944 1967 1972	2.5 - 4.5 3.5 - 5.5 2.5 - 4.5

Miscellaneous Specialty Plasters - Generally less than 1%

Fireproofing Plasters

Firecode V	Approximately 12%
Firecode V Type D	Approximately 12%

Ceiling Tile

Acoustone 120*	Approximately 3%
Acoustone 180	Approximately 3%

Texture Products - Approximately 3 - 5 %. Investigation continues as to individual texture products.

Paste Spackling Putty - Approximately 3%

Pipecoverings - Approximately 30 - 91%

*Not all formulations contained asbestos.

((

Joint Compounds - Approximately 3 - 5%

Rigid Block Insulation - Approximately 10 - 21%

Mortar - Less than 1%

Siding Shingles - Approximately 12 - 15%

Roofing Shingles - Approximately 0.6 - 1%

Variation in asbestos content is usually reflective of formula changes relative to working properties.

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

I, C. L. Murphy, declare:

I am the Manager, Analytical & Administrative Services, of United States Gypsum Company, one of the above named defendants, and am authorized to make this verification for and on behalf of said corporation;

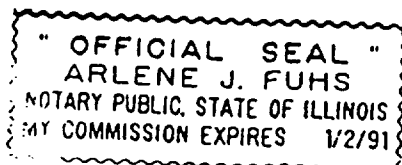
I have read the foregoing Answers, Objections, and other responses to Plaintiff's Interrogatories and am informed and believe that the same is true and on that ground allege that the matters therein stated are true.

I declare, under penalty of perjury, that the foregoing is true and correct, and that this declaration was executed on July 13, 1987 in Chicago, Illinois.

C. L. Murphy
C. L. Murphy

Subscribed and sworn to before me
this 13th day of July, 1987.

Walter J. Fuhs
Notary Public



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ANSWER:

a-e) C. L. Murphy, Manager, Analytical and Administrative Services, United States Gypsum Company, has reviewed these responses for the purpose of satisfying the verification requirements. These responses have been prepared based on the continual review of documents located in this defendant's files and information obtained from discussions with this defendant's employees over a period of many years. It is not possible to reconstruct each step taken to gather this information or to verify all documents which might possibly pertain to the matters at issue that have been located or examined in connection with these responses. Nor is it possible to specifically identify by name each person who has participated in the preparation of these responses or to identify each document which may have provided information used in preparing these responses.

f) (1) This defendant has been licensed to do business in the state of Illinois since 1933 and the state of Missouri since 1936.

(2) Objection. This defendant has not produced products which contain asbestos as part of their formulation during the last three years. Therefore, this Interrogatory is irrelevant and immaterial and will lead to the discovery of no admissible evidence.

(3) Objection. This interrogatory is irrelevant as no entities have been identified in 1(f)(2).

INTERROGATORY NO. 2: Has the person answering these Interrogatories made reasonable inquiry of all available sources of information such that Plaintiff may rely on these answers as the truthful and complete answers made on behalf of this answering defendant? State the proper legal name and the present address of the principal place of business of each of defendant's related companies. For each related company identified please state:

- (a) Whether or not the company is licensed to do business in the State of Illinois;
- (b) The business relationship between the company and defendant;
- (c) The nature of the products or services that defendant sells to or purchases from the company;
- (d) The type of business the company conducts within the State of Illinois
- (e) Whether or not the company advertises Defendant's products or services within the State of Illinois;
- (f) Whether or not the company sells Defendant's products or services within the State of Illinois; and, if so, the approximate value of those sales or services during 1930 to present;
- (g) Whether or not the company pays any type of taxes to the State of Illinois or any political body located within the State of Illinois;
- (h) Whether or not defendant has any control, directly or indirectly, over the company's advertising of defendant's products or services.

ANSWER:

See this defendant's response to Interrogatory No. 1(a-e).

INTERROGATORY NO. 3: State the following concerning this defendant:

- (a) Full and Correct name;
- (b) Principal place of business;
- (c) State of incorporation;
- (d) Date of incorporation, and name of Corporation
- (e) Is this defendant authorized to transact business in the State of Illinois? If so, state the date such authority was first issued and last renewed;
- (f) Does this defendant have an agent, representative or place of business in Illinois? If so, state the name and address of such agent, representative, or other place of business;
- (g) Does this defendant have an agent for service in the State of Illinois? If so, state the name and address of the registered agent.

ANSWER:

- (c) Processed such a product?
- (d) Sold such a product?
- (e) Distributed such a product?
- (f) Patented such a product?
- (g) Relabeled such a product which was manufactured, sold or distributed by another company?

ANSWER:

- a) Yes
- b) Yes
- c) Objection. This defendant objects to the term "processed" as being vague and ambiguous. Therefore, this defendant is unable to form a meaningful response.
- d) Yes
- e) Yes
- f) This defendant does not maintain its patent files in such a manner as would facilitate retrieval of this information. This defendant will make information responsive to this inquiry available to the plaintiff at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606.
- g) U. S. Gypsum manufactured colored exterior stucco for National Gypsum Company from the 1940's to the 1970's. This was resold under National Gypsum's Gold Bond label. U. S. Gypsum possesses documents which indicate that it was authorized to manufacture exterior finish stucco for the following companies who sold it under their company label: National Brickstone, early 1960's; Brickstone International, early 1960's to early 1970's; Temple Brick Corporation, mid-1960's.

U. S. Gypsum manufactured a high temperature block insulation product for A. P. Green Refractories Company for an eighteen month period in 1970 and 1971.

Further, U. S. Gypsum manufactured SprayDon Fireproofing from 1966 to 1971 for the Sprayon Research Corporation. Those products were sold and distributed by Sprayon Research Corporation and Metropolitan Spray, and manufactured according to Sprayon specifications by this defendant.

The above-referenced documents will be made available for plaintiff's inspection through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 8: If your answer to No. 7(b), 7(d), and 7(e) is "Yes", then give the trade name of the product, the year the defendant or predecessor first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER:

See attached Exhibit No. 1.

INTERROGATORY NO. 9: Have any of the products listed above in Interrogatories No. 7 been altered in chemical composition since first being marketed?

ANSWER:

Objection. This defendant objects to this interrogatory as being overbroad and burdensome. There may have been many minor changes over the years due to raw material availability and differing geographical market conditions; however, it would be extremely time consuming and burdensome to document each and every one of those minor changes.

INTERROGATORY NO. 10: If so, please state:

(a) The trade name of each such product:

- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 9.

INTERROGATORY NO. 11: What is the name, address, and the job title of each individual who participated in the design and preparation of manufacturing specification for each such product?

ANSWER:

Objection. This interrogatory is overbroad, burdensome and harassment to this defendant. This defendant has employed thousands of employees since its inception, and thus it would be impossible to determine who would have the knowledge or information that plaintiff was seeking.

INTERROGATORY NO. 12: Do any written memoranda, specifications, blueprints or other written materials of any kind of character relating to the design and preparation of said products now exist?

ANSWER:

Operating bulletins which plaintiff can establish are relevant to the subject matter of this litigation will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606.

INTERROGATORY NO. 13: If so, please state:

- (a) List each written material or document;
- (b) Who presently has possession of each such document?
- (c) Where is it located?

ANSWER:

misused any of your products then state how and under what circumstances your product was misused.

ANSWER:

Objection. There is no indication in these cases that this defendant's asbestos-containing products have been removed, stripped, or replaced at any time after installation. Therefore, this interrogatory is overbroad, irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 22: Prior to releasing the asbestos products manufactured, sold, etc. to the public for sale, were any tests conducted on same to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

Objection. This defendant objects to this Interrogatory as not being limited to asbestos, the focus of this litigation. Furthermore, no product can be tested for all "potential health hazards involved in the use of materials contained therein", therefore this interrogatory is overbroad and burdensome.

INTERROGATORY NO. 23: If so, please state:

(a) The name, address, and job classification of each individual who conducted such tests.

(b) The results of such said tests.

(c) Date of such studies.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 22.

INTERROGATORY NO. 24: 'Do any written memoranda, specifications, blueprints or other written materials of any kind or character exist relating to the testing of said product?

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 22.

INTERROGATORY NO. 25: If so, please state:

(a) List each such written material or document.

(b) Who presently has possession of each such document and where it is located.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 22.

INTERROGATORY NO. 26: Did defendant or any of its subsidiary companies make any design changes as a result of such tests?

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 22.

INTERROGATORY NO. 27: If so, please state:

(a) The nature of the change made.

(b) The name, address, and job classification of each person in charge of making a change.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 22.

INTERROGATORY NO. 28: After releasing said products to the public, were any tests conducted thereon to determine potential health hazards involved in the use of materials contained therein?

ANSWER:

Objection. This defendant objects to this interrogatory as not being limited to asbestos, the focus of this litigation. Furthermore, no product can be tested for all "potential health hazards involved in the use of

materials contained therein", therefore this interrogatory is overbroad and burdensome.

INTERROGATORY NO. 29: If so, please state:

(a) The name, address, and job classification of each person conducting said tests.

(b) The results of said tests.

ANSWER:

Not applicable. See this defendant's response to interrogatory No. 28.

INTERROGATORY NO. 30: Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to go to areas where your products were being used or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the findings, and attach results.

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 31: If your company performed or had performed any dust level counts, what action based on the results did your company take?

ANSWER:

Objection. This interrogatory is vague and ambiguous in that it is not limited to dust levels related to asbestos. Without waiving this objection, several surveys were taken at various U. S. Gypsum plants. These involved studies of nuisance dusts, one of which was asbestos.

Relevant documents relating to the studies referenced above will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

your asbestos products instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER:

Objection. This interrogatory is overbroad in that it is not limited to asbestos, the focus of this litigation. Therefore, this interrogatory is irrelevant and immaterial and will lead to the discovery of no admissible evidence. Nevertheless, without waiving the above stated objection, all packaging contained directions and instructions for use.

INTERROGATORY NO. 37: Did your company, or your predecessor(s), ever place any warning signs on the containers in which asbestos products were packaged?

ANSWER:

See attached Exhibit No. 3.

INTERROGATORY NO. 38: If you have answered Interrogatory No. 37 in the affirmative, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your asbestos products, or containers?

(b) On what date was such warning actually first placed on your asbestos products or containers?

(c) On what date did your asbestos products, accompanied by such warning, first reach the contractor?

(d) State the exact wording of the first warning.

(e) State the exact size of the warning printed on your asbestos products or container.

(f) Did your company, or its predecessor(s) dictate the exact size of the printed warning?

(g) Why did your company or its predecessor(s) place such warning on your asbestos products or containers?

(h) Did your company or its predecessor(s) place such warning on your asbestos products or containers because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion, legal opinion, or other type of communication.

(i) If the wording of the warning has ever been changed or altered, state when it was changed and the exact change in the wording.

ANSWER:

See this defendant's response to interrogatory No. 37.

INTERROGATORY NO. 39: Did your company or its predecessor(s) ever place any warning directly on any of its asbestos pipe covering, block, cloth, millboard or other asbestos products?

ANSWER:

See this defendant's response to interrogatory No. 37.

INTERROGATORY NO. 40: Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, millboard or other asbestos product?

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 41: Did the warning inquired about in Interrogatories 39 and 40, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

ANSWER:

U. S. Gypsum maintains no central repository for the accumulation of the requested information in the ordinary course of business. Documents that have already been identified and gathered to respond to discovery requests in other litigation and that relate to products which plaintiff can establish

are relevant to this litigation, will be made available for inspection at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois, pursuant to a properly filed motion to produce.

INTERROGATORY NO. 42: On what date was the sales literature inquired about in Interrogatory No. 41 first provided to distributors or sellers of your company's asbestos products, or your predecessor(s)'s products?

ANSWER:

See this defendant's response to interrogatory No. 41.

INTERROGATORY NO. 43: Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

ANSWER:

This interrogatory is overbroad in that it is not limited to asbestos-containing products, the focus of this litigation. Therefore, this interrogatory is irrelevant and immaterial and will lead to the discovery of no admissible evidence.

INTERROGATORY NO. 44: Did your company or its predecessor(s) ever recall any products containing asbestos from the common market?

(a) State all details of such recall, giving the name of the product, the time of recall and any further action taken in connection with the recall.

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 45: Has your company or its predecessor(s) ever directly advised any contractor to whom you sell your products containing asbestos of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor, and the name of each contractor.

ANSWER:

Packaging bulletins for products which plaintiff can establish are relevant to the subject matter of this litigation will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 58: Has the answering defendant or any of its predecessor(s) ever mined asbestos? If so, state the dates in which such mining took place and the locations of the mines.

ANSWER:

This defendant never mined asbestos.

INTERROGATORY NO. 59: List by brand name every product containing asbestos which defendant or defendant's predecessor(s) has manufactured since 1910. As to each such product, please state the following:

- (a) The type of product (e.g., acoustical plaster, fireproofing, concrete, etc.);
- (b) The date the product first went into production;
- (c) The date the product was discontinued from production;
- (d) The last date the product was sold;
- (e) All manufacturing locations of the product;
- (f) The identity of the plant manager(s) or managing agent(s) of defendant who has knowledge of the products manufactured by defendant and its predecessor(s), and who may be called upon by plaintiffs to testify by deposition.

ANSWER:

a-e) See attached Exhibit 1.

f) Objection. This interrogatory is overbroad, irrelevant and will lead to the discovery of no admissible evidence. This defendant has employed thousands of employees since its inception and thus it would be impossible to

follows: Prior to 1966, U. S. Gypsum sold its construction products, some of which may have contained small amounts of asbestos, exclusively through independent dealers. Beginning in about 1966, U. S. Gypsum sold its construction products either directly to independent contractors, independent distributors or, as had previously been the custom, through independent dealers.

INTERROGATORY NO. 63: Identify your distributors and/or suppliers of raw asbestos, asbestos cement and other asbestos products with which you had business contact.

ANSWER:

This defendant never sold, distributed or manufactured raw asbestos. In further response to this interrogatory, see this defendant's response to interrogatory No. 60(d).

INTERROGATORY NO. 64: Is this defendant aware or has it possessed knowledge concerning the reported causal connection between exposure to asbestos or asbestos products and:

- (a) Asbestosis?
- (b) Lung cancer?
- (c) Mesothelioma?
- (d) Other cancer?

ANSWER:

a-c) See attached Exhibit No. 4.

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INTERROGATORY NO. 65: If answer to preceding Interrogatory as to any or all of its subparts, is in the affirmative, identify:

- (a) When and how defendant first learned of such connection;
- (b) If knowledge was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting and provide the identity of persons attending and documents obtained;
- (c) If knowledge was obtained from medical or scientific studies,

or any other published work, identify same;

(d) If otherwise obtained, identify manner of receipt of document or communication.

ANSWER:

See attached Exhibit No. 4.

INTERROGATORY NO. 66: With regard to any knowledge obtained subsequent to that identified in your answer to Interrogatory 65 (a) above, identify:

(a) All documents or communications, oral or written, concerning the casual connection between exposure to asbestos or asbestos products and disease, and identity of persons so communicating;

(b) Did answering defendant obtain from or transmit any such information to other defendants in this case? If so, identify:

(1) Manner of receipt or communication for each contact;

(2) All documents and persons involved.

ANSWER:

U. S. Gypsum maintains two libraries, neither of which deals specifically with industrial hygiene, medicine, safety or engineering. Individual employees of this defendant may maintain personal files on specific subjects. Furthermore, this defendant has, in preparation for the defense of these asbestos-related cases, gather documents and literature regarding asbestos, including its health effects, which are subject to attorney/client privilege and work product doctrine.

If the plaintiff will identify the articles, journals or periodicals in which it is interested, U. S. Gypsum will attempt to ascertain whether or not the publication is in its library.

Librarians at 101 South Wacker Drive, Chicago, Illinois 60606:

HEYL, ROYSTER, VOELKER
& ALLEN
PROFESSIONAL CORPORATION
INEYS AT LAW
111 SOUTH STREET
CHICAGO, ILLINOIS 60606
16181 836-4646

M. Morrissey
M. Dorigan
N. Nwerdyke

Unknown
Unknown - 6/30/74
8/20/74 - 5/29/80

C. Crabtree	1/80 - 11/80
P. A. Julien	9/80 - 9/84
S. Gerrity	9/84 - present

Research librarian:

M. Ehrmann	1961 - present
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Investigation is continuing.

INTERROGATORY NO. 67: As to any knowledge possessed by answering defendant at any time referred to in your answer to Interrogatory 64, did you educate your employees, distributors or purchasers of the hazards known to you and the safety precautions necessary to guard against cancer and other diseases arising from the use and handling of your products? If so, identify:

- (a) When and in what manner customers, insulators, factory workers and the general public were so informed;
- (b) Documents communicating or otherwise disseminating such information;
- (c) Programs initiated or sponsored to establish or promote safety procedures, methods or usage of equipment;
- (d) Published articles or reports by employees (present or prior), including those of medical directors, scientists, engineers or other professionals;
- (e) Symposia or lectures sponsored for the benefit of asbestos workers and/or the general public.

ANSWER:

a-e) See attached Exhibit No. 3.

INTERROGATORY NO. 68: When and by what manner were your first aware of the hazards relating to exposure to asbestos or asbestos products:

- (a) For inside insulators and contractors.
- (b) For outside insulators and contractors.

ANSWER:

Objection. This interrogatory assumes that there is automatically and always a hazard condition to the occupations specific, which is not necessarily the case. Nevertheless, without waiving said objection, see attached Exhibit No. 4.

INTERROGATORY NO. 69: If you have knowledge or information concerning the following, answer in the affirmative or negative, whether:

- (a) Early detection of mesothelioma results in any appreciable rate of cure or arrest;
- (b) A single exposure to asbestos may cause mesothelioma, other cancers or asbestosis;
- (c) Cumulative or multiple exposures to asbestos result in a greater risk of harm to the exposed person;
- (d) An outside insulator has a risk of harm from exposure to asbestos or asbestos products;
- (e) Stripping or removing old asbestos creates a greater risk of harm than insulation of asbestos or asbestos products;
- (f) Cancer resulting from exposure to asbestos develops generally after:
 - (1) 1-5 years
 - (2) 6-10 years
 - (3) 11-20 years
- (g) There is any known relationship between smoking and mesothelioma;
- (h) There is any reported cause of mesothelioma other than exposure to asbestos.

ANSWER:

a-b) Objection. This interrogatory calls for a technical and medical conclusion which no employee of this defendant is sufficiently trained to provide.

INTERROGATORY NO. 70: As to each answer to Interrogatory 69, identify at least one person or document upon which answering defendant relies

ANSWER:

See this defendant's answer to interrogatory No. 69.

INTERROGATORY NO. 71: Did you perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning the relationship between asbestos exposure and asbestosis and/or cancer? If so, identify:

- (a) When, where and at what intervals such studies were performed;
- (b) Were such studies in writing or reported at a later date in writing;
- (c) Were the results of such studies published or otherwise disseminated? If so, state to whom and when;
- (d) Who performed such studies;
- (e) Will you produce the results of such studies at this time or state where the results are maintained.

ANSWER:

a-e) U. S. Gypsum is aware that it may have contributed to a study conducted beginning approximately in 1936 by Dr. Leroy Gardner of the Saranac Laboratory.

Relevant documents relating to the studies referenced above will be made available for plaintiff's inspection at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois. However, documents relating to the above-referenced research projects, containing as they do confidential and proprietary information, will be made available only pursuant to a court approved confidentiality stipulation and protective order.

INTERROGATORY NO. 72: Identify the scientific or medical periodicals to which defendant, its medical department or industrial hygiene division subscribed from 1925 to the present, and the dates of such subscriptions.

ANSWER:

See attached Exhibit No. 8.

INTERROGATORY NO. 73: Did defendant, its medical department or industrial hygiene division maintain a medical and/or scientific library at any time from 1925 to the present? If so, state:

- (a) The dates such library existed;
- (b) The number of volumes maintained therein;
- (c) The number of employees, part-time or full-time, assigned to maintenance of said library, and to whom in the corporate structure those employees report(ed).

ANSWER:

See this defendant's response to interrogatory No. 66.

INTERROGATORY NO. 74: Identify all trade organizations, associations, or other entities, including but not limited to A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., P.I.C.A., or Q.A.P.A., to which you have belonged or in which you have participated since 1925, stating the applicable dates of such membership or participation.

ANSWER:

See attached Exhibit No. 8.

INTERROGATORY NO. 75: Identify all persons attending on your behalf any meetings held by trade organizations, associations, or other entities identified in answer to Interrogatory No. 74.

ANSWER:

See attached Exhibit No. 8.

INTERROGATORY NO. 76: Identify the names or nature of all notes, reports, studies, or other writings submitted by you or received by you at meetings held by organizations described in answer to Interrogatory No. 74.

ANSWER:

See attached Exhibit No. 8.

INTERROGATORY NO. 77: Identify any documents received by you from or submitted by you to those trade organizations, associations or other entities identified in answer to Interrogatory No. 74 relating to the relationship between asbestos exposure and disease.

ANSWER:

See attached Exhibit No. 8.

INTERROGATORY NO. 78: Identify all agreements, oral or written, between you, any of the other defendants in this lawsuit, and/or any other organizations, associations or other entities identified in your answer to the Interrogatory No. 74 or any medical or scientific foundations, relating to the standardization of:

- (a) Specifications for asbestos cloth products;
- (b) Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos cement;
- (c) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (d) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public;
- (e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
- (f) Medical programs to be offered or sponsored by defendant.

ANSWER:

Objection. This interrogatory is overbroad in that it requires this defendant to respond for entities other than itself and of which this defendant cannot be fully knowledgeable. As relates to this defendant, none to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 79: Did you direct to be performed, sponsor, finance, receive the results of or were you aware of any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human life? If so, identify:

- (a) All documents summarizing findings or results of those studies or tests which you have in your possession or control;
- (b) All communications, oral or written, between answering defendant and Saranac personnel, including but not limited to Gerrit W.H. Schepers, M.D.;
- (c) All documents relating to Saranac studies received or submitted by you either directly, through associated or predecessor companies, through other companies, or through any trade associations, organizations or other entities;
- (d) All recommendations or findings of such studies relating to:
 - (1) Adequacy or inadequacy of threshold limit values;
 - (2) Substitution of materials other than asbestos to be used in the insulation process.
- (e) Where documents and/or communications identified in answers to (a)-(d) of this interrogatory are maintained.

ANSWER:

a-e) See this defendant's response to interrogatory No. 71.

INTERROGATORY NO. 80: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by asbestosis? State the date such disease of any employee was first known by defendant.

ANSWER:

Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore this interrogatory is overbroad, irrelevant, immaterial and will lead to the discovery of no admissible evidence. Nevertheless, any documents that this defendant may have that may be responsive to this request will be made available for plaintiff's

inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 81: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by lung cancer? State the date such disease of any employees was first known by defendant.

ANSWER:

Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore this interrogatory is overbroad, irrelevant, immaterial and will lead to the discovery of no admissible evidence. Nevertheless, any documents that this defendant may have that may be responsive to this request will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 82: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by mesothelioma? State the date such disease of any employee was first known by defendant.

ANSWER:

Objection. There has been no allegation that plaintiff was ever an employee of this defendant. Therefore this interrogatory is overbroad, irrelevant, immaterial and will lead to the discovery of no admissible evidence. Nevertheless, any documents that this defendant may have that may be responsive to this request will be made available for plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 83: Do you send or have you at any time sent counsel or other representatives to courses at defending asbestos cases? If so, identify.

ANSWER:

Objection. This interrogatory seeks information protected by attorney/client privilege and work product doctrine. Furthermore, this interrogatory is vague and ambiguous; therefore this defendant is unable to form a meaningful response.

INTERROGATORY NO. 84: Identify all expert witnesses who have testified in other cases, pending or otherwise, on behalf of answering defendant.

ANSWER:

Objection. This interrogatory is overbroad in that it is not limited to asbestos, the focus of this litigation.

INTERROGATORY NO. 85: Identify all present or former employees or answering defendant, other than plaintiffs, who have testified against this defendant in a litigation matter or before a governmental agency or unit.

ANSWER:

Objection. This interrogatory is overbroad in that it is not limited to asbestos, the focus of this litigation.

INTERROGATORY NO. 86: With respect to your answers to Interrogatories No. 84 and 85, identify all documents, including but not limited to transcripts or notes of testimony employed by or resulting from the testimony of such expert witnesses or employees.

ANSWER:

See this defendant's response to interrogatory No.'s 84 and 85.

INTERROGATORY NO. 87: Identify:

(a) Any expert whom you intend to call as a witness or otherwise

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utilize in connection with this litigation;

(b) The subject matter on which the expert is expected to testify;

(c) The substance of the facts and opinions to which the expert is expected to testify;

(d) A summary of the grounds for each opinion;

(e) The address of such person and his field or expertise;

(f) Identify and produce each treatise, article or text upon whether the expert will rely in his testimony.

ANSWER:

a-f) Such determination has not yet been made.

INTERROGATORY NO. 88: Identify and produce all board meeting minutes at which asbestos products, the hazards of asbestos exposure, the possible application of warning labels on asbestos containing products were discussed by the Board of Directors of your company.

ANSWER:

Relevant documents, to the extent they exist, will be made available for this plaintiff's inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

INTERROGATORY NO. 89: Please identify by name, address and phone number each person who has provided this answering party with statements in connection with this litigation.

ANSWER:

Objection. It is not possible to specifically identify by name each person who has participated in the preparation of these responses or to identify each document which may have provided information used in preparing these responses.

INTERROGATORY NO. 90: Please identify each person who has been interviewed in the course of preparing for the trial of this matter.

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ANSWER:

Objection. These responses have been prepared based on the continual review of documents located in this defendant's files and information obtained from discussions with this defendant's employees over a period of many years. It is not possible to reconstruct each step taken to gather this information or verify all documents which might possibly pertain to the matters at issue that have been located or examined in connection with these responses.

INTERROGATORY NO. 91: Has this Defendant ever sold any asbestos containing products to Insulation and Material Company of St. Louis, Missouri or any other individual, corporation, partnership or other business entities within a 100 mile radius of Madison County, Illinois since 1920 including but not limited to St. Louis County, St. Louis City, St. Charles County, Missouri or Madison County or St. Clair County, Illinois, if so state:

- (a) List all individuals, corporations, partnerships or other business entities you have sold asbestos containing products to;
- (b) State all dates when asbestos containing products were sold to these entities;
- (c) State what asbestos containing products were sold to these entities and identify by brand name;
- (d) State what quantity of asbestos products were sold to these entities;
- (e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in (a) above or otherwise identify all documents relating to the sale.

ANSWER:

This defendant has no sales records for the years prior to 1966. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time

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at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

INTERROGATORY NO. 92: Have you ever sold any asbestos containing products to:

Monsanto, East St. Louis, Illinois
Marathon Oil Refinery, Robinson, Illinois
Shell Oil Company Refinery, Roxana, Illinois
Amoco Refinery, Wood River, Illinois
Clark Oil Company Refinery, Hartford, Illinois
Granite City Steel, Granite City, Illinois
Illinois Power Company (Alton Powerhouse)
Central Illinois Power Service (Coffeen Powerhouse)
Commonwealth Edison (Kinkaid Powerhouse)
Illinois Power Company (Portage Des Sioux Powerhouse)
Central Illinois Power Service (Meredosia Powerhouse)
Illinois Power Company (Grant Ford Powerhouse)
Owens-Illinois Glass Co., Alton, Illinois
Central Illinois Power Service (Baldwin Powerhouse)
Central Illinois Power Service (Pearle Powerhouse)
Central Illinois Power Service (Marion Powerhouse)
Central Illinois Power Service (Newton Powerhouse)
Texaco Oil Company Refinery, Lawrenceville, Illinois
American Steel, Granite City, Illinois
Cerro Copper, Granite City, Illinois
Consolidated Aluminum Company, Granite City, Illinois
Olin Corporation, East Alton, Illinois
Laclede Steel Company, Alton, Illinois
Sinclair Oil Refinery, Hartford, Illinois
Apex Oil Refinery, Hartford, Illinois

and if so:

- (a) List all individuals, corporations, partnerships, or other business entities you have sold asbestos containing products to.
- (b) State all dates when asbestos containing products were sold to these entities.
- (c) State what asbestos containing products were sold to these entities and identify by brand name.
- (d) State what quantity of asbestos containing products were sold to these entities.
- (e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in (a) above or otherwise identify all documents relating to the sale.

ANSWER:

This defendant has no sales records for the years prior to 1966. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

INTERROGATORY NO. 93: Has this Defendant ever been a General Contractor or Subcontractor where it used asbestos containing products at any of the following locations:

Monsanto, East St. Louis, Illinois
Marathon Oil Refinery, Robinson, Illinois
Shell Oil Company Refinery, Roxana, Illinois
Amoco Refinery, Wood River, Illinois
Clark Oil Company Refinery, Hartford, Illinois
Granite City Steel, Granite City, Illinois
Illinois Power Company (Alton Powerhouse)
Central Illinois Power Service (Coffeen Powerhouse)
Commonwealth Edison (Kinkaid Powerhouse)
Illinois Power Company (Portage Des Sioux Powerhouse)
Central Illinois Power Service (Meredosia Powerhouse)
Illinois Power Company (Grant Ford Powerhouse)
Owens-Illinois Glass Co., Alton, Illinois
Central Illinois Power Service (Baldwin Powerhouse)
Central Illinois Power Service (Pearle Powerhouse)
Central Illinois Power Service (Marion Powerhouse)
Central Illinois Power Service (Newton Powerhouse)
Texaco Oil Company Refinery, Lawrenceville, Illinois
American Steel, Granite City, Illinois
Cerro Copper, Granite City, Illinois
Consolidated Aluminum Company, Granite City, Illinois
Olin Corporation, East Alton, Illinois
Laclede Steel Company, Alton, Illinois
Sinclair Oil Refinery, Hartford, Illinois
Apex Oil Refinery, Hartford, Illinois

and if so:

(a) List all individuals, corporations, partnerships, or other business entities you have sold asbestos containing products to.

(b) State all dates when asbestos containing products were sold to these entities.

(c) State what asbestos containing products were sold to these

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entities and identify by brand name.

(d) State what quantity of asbestos containing products were sold to these entities.

(e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in (a) above or otherwise identify all documents relating to the sale.

ANSWER:

Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 94: Did this defendant ever provide any warning concerning the hazards of asbestos to any of the following companies:

Monsanto, East St. Louis, Illinois
Marathon Oil Refinery, Robinson, Illinois
Shell Oil Company Refinery, Roxana, Illinois
Amoco Refinery, Wood River, Illinois
Clark Oil Company Refinery, Hartford, Illinois
Granite City Steel, Granite City, Illinois
Illinois Power Company (Alton Powerhouse)
Central Illinois Power Service (Coffeen Powerhouse)
Commonwealth Edison (Kinkaid Powerhouse)
Illinois Power Company (Portage Des Sioux Powerhouse)
Central Illinois Power Service (Meredosia Powerhouse)
Illinois Power Company (Grant Ford Powerhouse)
Owens-Illinois Glass Co., Alton, Illinois
Central Illinois Power Service (Baldwin Powerhouse)
Central Illinois Power Service (Pearle Powerhouse)
Central Illinois Power Service (Marion Powerhouse)
Central Illinois Power Service (Newton Powerhouse)
Texaco Oil Company Refinery, Lawrenceville, Illinois
American Steel, Granite City, Illinois
Cerro Copper, Granite City, Illinois
Consolidated Aluminum Company, Granite City, Illinois
Olin Corporation, East Alton, Illinois
Laclede Steel Company, Alton, Illinois
Sinclair Oil Refinery, Hartford, Illinois
Apex Oil Refinery, Hartford, Illinois

If so, identify what the warning was, how the warning was delivered and when the warning was delivered. Provide copy of warning and correspondence concerning the warning.

ANSWER:

Some or all of the listed companies may have seen this defendant's packages containing warnings as specified in Exhibit No. 3. Otherwise, not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 95: Has this Defendant ever had any correspondence with any of the following companies or facilities concerning products containing asbestos:

Monsanto, East St. Louis, Illinois
Marathon Oil Refinery, Robinson, Illinois
Shell Oil Company Refinery, Roxana, Illinois
Amoco Refinery, Wood River, Illinois
Clark Oil Company Refinery, Hartford, Illinois
Granite City Steel, Granite City, Illinois
Illinois Power Company (Alton Powerhouse)
Central Illinois Power Service (Coffeen Powerhouse)
Commonwealth Edison (Kinkaid Powerhouse)
Illinois Power Company (Portage Des Sioux Powerhouse)
Central Illinois Power Service (Meredosia Powerhouse)
Illinois Power Company (Grant Ford Powerhouse)
Owens-Illinois Glass Co., Alton, Illinois
Central Illinois Power Service (Baldwin Powerhouse)
Central Illinois Power Service (Pearle Powerhouse)
Central Illinois Power Service (Marion Powerhouse)
Central Illinois Power Service (Newton Powerhouse)
Texaco Oil Company Refinery, Lawrenceville, Illinois
American Steel, Granite City, Illinois
Cerro Copper, Granite City, Illinois
Consolidated Aluminum Company, Granite City, Illinois
Olin Corporation, East Alton, Illinois
Laclede Steel Company, Alton, Illinois
Sinclair Oil Refinery, Hartford, Illinois
Apex Oil Refinery, Hartford, Illinois

If so, provide copy of any correspondence with any of the above companies concerning asbestos containing products.

ANSWER:

None, to this defendant's best current knowledge, information and belief.

UNITED STATES GYPSUM COMPANY, Defendant

By: _____
L, ROYSTER, VOELKER & ALLEN

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& ALLEN
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<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Sabinite	Acoustical Plaster	1930	*1964	Fort Dodge, IA
		1930	1945	Midland, CA
		1930	1945	East Chicago, IN
		1930	*1964	New Brighton, NY
		1930	1945	Gypsum, OH
Audicote	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Hi-Lite	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
Red Top Trowel Finish	Finish Plaster	1930	1935	Gypsum, OH
		1930	1935	East Chicago, IN Fort Dodge, IA New Brighton, NY
		1950	1951	Fort Dodge, IA
Oriental Interior Finish Plaster	Finish Plaster	1942	1972	Oakfield, NY
		1942	1972	Fort Dodge, IA
		1942	1972	New Brighton, NY
		1942	1972	Sweetwater, TX
		1942	1944	Boston, MA
				Gypsum, OH
		1949	1950	Philadelphia, PA Jacksonville, FL
		1949	1972	Norfolk, VA Philadelphia, PA
Red Top Cover Coat	Finish Plaster	1942	1954	Southard, OK
Red Top Patching Plaster	Finish Plaster	1929	1947	Gypsum, OH
		1942	1946	New Brighton, NY
		1942	1951	Nephi, UT
		1944	1947	Milwaukee, WI South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Red Top Wood Fiber Plaster - Regular	Basecoat	1945	1972	East Chicago, IN
				Heath, MT
		1945	1952	Nephi, UT
		1945	1959	Midland, CA
		1945	1963	Fort Dodge, IA
		1945	1963	Detroit, MI
		1945	1965	Sweetwater, TX
		1945	1966	Loveland, CO
		1945	1967	Southard, OK
		1945	1960	Plaster City, CA
		1948	1952	Gerlach, NV
		1948	1972	Sigurd, UT
		1952	1960	Empire, NV
Red Top Wood Fiber Plaster - Machine Application	Basecoat	1959	1961	Plaster City, CA
		1972	1972	East Chicago, IN
Cement Plaster Regular. Name changed to Gypsum Plaster 7/67; to Red Top Gypsum Plaster 11/68	Basecoat	1943	1947	Loveland, CO
Red Top Cement Plaster for Machine Application. Name changed to Red Top Gypsum Plaster for Machine Application 7/67	Basecoat	1962	1966	Gypsum, OH
		1962	1966	Detroit, MI
		1964	1966	Oakfield, NY
Red Top Structo-Lite Gypsum Plaster for Machine Application	Basecoat	1955	1962	Boston, MA
				Detroit, MI
				East Chicago, IN
				Fort Dodge, IA
				Gypsum, OH
				Jacksonville, FL
				Loveland, CO
				New Brighton, NY
				Norfolk, VA
				Oakfield, NY
				Philadelphia, PA
				Plasterco, VA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Red Top Structo-Lite Gypsum Plaster for Machine Application (cont.)		1955	1959	Southard, OK
		1957	1962	Sweetwater, TX
		1958	1962	Milwaukee, WI
		1963	1972	Shoals, IN
		1971	1972	Plaster City, CA
Oriental Exterior Finish Stucco	Exterior Finish Stucco	1930	1973	Fort Dodge, IA
		1930	1944	Gypsum, OH
		1930	1972	New Brighton, NY
		1930	1972	Oakfield, NY
				Sweetwater, TX
		1932	1944	Boston, MA
				Philadelphia, PA
		1932	1946	Milwaukee, WI
		1949	1972	Jacksonville, FL
				Philadelphia, PA
		1949	1972	Norfolk, VA
Pyrobar Mortar Mix	Aggregated plaster	1969	1970	East Chicago, IN
		1969	1972	New Brighton, NY
Sheetrock Radiant Heat Filler - Machine Application	Specialty plaster	1971	1972	Empire, NY
Bondcrete	Basecoat	1940	1943	Midland, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
SPRAYDON STANDARD A ^o	Fireproofing	1966	1971	S. Plainfield, NJ Torrance, CA
SPRAYDON STANDARD G ^o	Fireproofing	1968	1970	S. Plainfield, NJ Torrance, CA
SPRAYDON POWERCOTE ^o	Thermal Insulation	1969	1971	Corsicana, TX

^o SprayDon - U. S. Gypsum manufactured this product pursuant to the specification of Sprayon Research Corporation.

FIRECODE V	Fireproofing Plaster	1964	1968	East Chicago, IN New Brighton, NY Empire, NY
FIRECODE D	Fireproofing Plaster	1959	1964	New Brighton, NY East Chicago, IN Empire, NY
****ACOUSTONE 120	Ceiling Tile	1967	1975	Gypsum, OH Walworth, WI
ACOUSTONE 180	Ceiling Tile	1966	1976	Walworth, WI Gypsum, OH
USG	Texture	1964	1976	Gypsum, OH Sweetwater, TX Dallas, TX Chamblee, GA Midway, IL South Gate, CA
Texolite	Texture	1961	1967	Gypsum, OH Dallas, TX New Brighton, NY South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
Pac-Tex	Texture	1943	1963	South Gate, CA Dallas, TX Sweetwater, TX
Imperial QT	Texture	1964	1976	South Gate, CA Dallas, TX Gypsum, OH Midway, IL New Brighton, NY Chamblee, GA
"SHEETROCK" Texture	Texture	1964	1976	Gypsum, OH Dallas, TX Midway, IL South Gate, CA
Textone	Texture	1944	1975	Gypsum, OH Sweetwater, TX South Gate, CA Dallas, TX New Brighton, NY
USG Textone	Texture Paint	1928	1974	South Gate, CA Gypsum, OH Chamblee, GA New Brighton, NY Sweetwater, TX
USG	Texture Paint	1954 1967	1964 1976	Chamblee, GA Sweetwater, TX Gypsum, OH
A-B TEX	Texture Paint	1935 1959 only 1973 only	1949	Gypsum, OH New Brighton, NY Sweetwater, TX Midway, IL Chamblee, GA South Gate, CA

<u>Product Name</u>	<u>Product Type/Use</u>	(Dates Approximately)		<u>Manufacturing Locations</u>
		<u>First Produced</u>	<u>Last Produced</u>	
<u>Other Products (By generic group)</u>				
Paste Spackling Putty		1952	1975	New Brighton, NY Gypsum, OH Chamblee, GA Sweetwater, TX
Pipecoverings		1936	1938	Jersey City, NJ
Joint Compounds		1920's?	1976	Gypsum, OH Midway, IL Chamblee, GA Dallas, TX East Chicago, IN Jacksonville, FL
Rigid Block Insulation		1943 1970	1950 1971	East Chicago, IN Greenville, MS
Siding Shingles		1937	1975	East Chicago, IN
Roofing		1937 1967 Possible other dates.	1946 1975	Jersey City, NJ St. Paul, MN South Gate, CA
Thermalux	Electric Heating	1961	1965	Shoals, IN (Assembled)
Asbestos Cement	Insulation purposes where sheet and block insulation would be impractical.	1936	1939	Jersey City, NJ

NOTE: Not all products were made at all plants at all times listed.

* May have been produced until this date, but sales diminished substantially by the mid-1950's.

*** Some of these products (Red Top Trowel Finish; Oriental Interior Finish Plaster; Red Top Cover Coat Finish Plaster; Red Top Patching Plaster; Red Top Wood Fiber Plaster Regular Basecoat; Red Top Wood Fiber Plaster Machine Application Basecoat; Cement Plaster - Regular, Name changed to Gypsum Plaster 7/67, to Red Top Gypsum Plaster Basecoat 11/68; Red Top Cement Plaster for Machine Application - Name changed to Red Top Gypsum Basecoat for Machine Application; Red Top Structo-Lite Gypsum Plaster for Machine Application Basecoat; Oriental Exterior Finish Stucco; Pyrobar Mortar Mix; Sheetrock Radiant Heat Filler - Machine Application) did not have asbestos as part of their formulation at all manufacturing locations at all times.

**** Some of these products did not have asbestos as part of their formulation.

Most of the products identified in this Exhibit have a shelf life of approximately six months, with some variation due to humidity and storage conditions. It is the policy of the defendant to provide this information to all customers. Therefore, date of last production approximates date of last sale, though U. S. Gypsum is not certain whether shelf life guidelines were adhered to by its customers. Reasonable investigation continuing.

U. S. Gypsum does not maintain examples of actual packaging in the normal course of business. All packaging contained the product name, this defendant's name, directions and instructions for use. To this defendant's best knowledge, information and belief, the product packaging for its asbestos-containing products was as follows:

Acoustical Plaster	Kraft Paper Bags
Miscellaneous Plasters	Kraft Paper Bags
Stucco	Kraft Paper Bags
Fireproofing Plaster	Kraft Paper Bags
Joint Compound	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Spray Textures	Kraft Paper Bags, metal and plastic buckets and cardboard cartons
Block Insulation	Cardboard Cartons
Pipecovering	Cardboard Cartons
Spackling Paste	Metal and plastic cans buckets and pails
Ceiling Tile	Cardboard Cartons
Asbestos Cement	Burlap bags, cardboard cartons

Available packaging bulletins dealing with products which plaintiff can establish were relevant to this lawsuit will be made available to the plaintiff for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, IL 60606.

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The following appeared on joint compound packaging, consistent with proposed OSHA standards, in 1972 and on textures in 1973:

"Caution: Contains Asbestos Fibers. Avoid Creating Dust. Breathing Asbestos Dust May Cause Serious Bodily Harm."

Additionally, the following was imprinted on joint compound packaging in approximately 1974:

"Observe the following precautions: Wet sanding or sponging finished joints is recommended rather than dry sanding to avoid creating dust. If dry sanding, mixing, or otherwise working in a dusty atmosphere containing this material, ventilate, use dust collector, or wear eye protection and a respirator approved by the Bureau of Mines, or NIOSH, to remove nuisance dust."

Concerning SprayDon, a product sold and distributed by Sprayon Research Corporation, manufactured by U. S. Gypsum according to that company's specifications, the following appeared on SprayDon bags in approximately June, 1966.

"Contains Asbestos"

The following appeared on SprayDon in subsequent years.

"Caution: This product contains asbestos (1968)

"Caution: This product contains asbestos, which may be harmful to lungs if inhaled." (1969)

ASBESTOS CONTAINING PRODUCTS

Acoustical Plasters - grayish-white;

Miscellaneous Specialty Plasters - white to off-white
plus some pastels for two products;

Fireproofing - grayish-white;

Fireproofing Plasters - white to off-white;

Ceiling Tile - white to off-white

Texture Products - white to off-white;

Paste Spackling Putty, Pipecoverings, Joint Compounds,
Rigid Block Insulation, Mortar - white to off-white;

Siding - white, gray, ivory, green, brown;

Roofing - red, green, blue, brown, black and gray

Asbestos-Containing Products -
Reasons for Discontinuation:

- I. Sabinit was replaced by Audicote and Hi-Lite in the marketplace. Audicote and Hi-Lite were discontinued because the low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- II. Cost of Compliance with proposed lower OSHA standards within the plant.
- III. At the direction of Sprayon Research Corporation.
- IV. The low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.
- V. Low Profitability.

<u>Product Categories</u>	<u>Reason for Discontinuation</u>	<u>Last Date of Manufacture</u>
* Acoustical Plasters	I	1974
Plasters	II	1972
Fireproofing Plasters	V	1970
** Fireproofing	III	1972
** Thermal Insulation	III	1971
Ceiling Tile	II	1976
Textures	II	1976
Roofing	II	1976
Joint Compounds	II	1976
Pipe Covering	V	1938
Asbestos Cement	V	1939
Rigid Block Insulation	V	1950
Block Insulation	IV	1971
Cement Siding	II & IV	1975
Paste Spackling Putty	II	1975

The following represents this defendant's best current information:

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY</u>
Gypsum Association	1930-present	Asbestos discussed at all of the following: <u>Membership meetings:</u> 10/27/71 - 10/28/71 - E. W. Duffy, W. W. Holloway, A. J. Watt 4/5/72 - J. H. Crumbaugh, A. R. Rump, C. G. Gramor, A. J. Watt, M. L. Hepsher, W. W. Holloway 4/4/73 - J. S. Bush, W. W. Holloway, A. J. Watt, C. G. Gramor, J. D. May, J. J. McLaughlin 10/10/73 - 10/12/73 - W. W. Holloway, A. J. Watt <u>Safety Committee Meetings:</u> 9/20/66 - P. D. Fix, G. R. Krug 9/17/67 - C. P. Kipp 3/19/68 - 3/20/68 - G. R. Krug 10/25/71 - W. E. Halley, J. D. Cornell, J. M. Rochers 9/19/73 - J. D. Cornell 3/7/74 - J. D. Cornell, M. R. Helton 8/14/74 - J. D. Cornell <u>Manufacturing & Mining Committee:</u> 4/3/73 - W. W. Holloway, H. D. Gobrecht	Minutes of meeting: these documents are in this defendant's files produced to this defendant in litigation by Gypsum Association. This defendant does not know if such individuals actually attended meetings listed in documents produced to this defendant by Gypsum Association in other litigation. Also, some test results are in this defendant's files.

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE FROM UNITED STATES GYPSUM COMPANY</u>
Gypsum Association (cont.)		<u>Manufacturing & Mining Committee:</u> 4/9/74 - W. W. Holloway 10/8/74 - W. W. Holloway, H. D. Gobrecht 8/10/76 - J. D. Cornell, K. E. Mohler, W. Lewis <u>Technical Committee:</u> 2/14/73 - 12/16/73 - J. H. Crumbaugh 8/1/73 - 8/3/73 - J. H. Crumbaugh, A. L. Hampton, R. L. Selbe 11/73 and 1/74 - unknown 2/13/74 - 2/15/74 - J. H. Crumbaugh 8/7/74 - 8/9/74 - J. H. Crumbaugh, R. L. Selbe <u>Board of Directors:</u> 4/5/73, 10/12/73 - A. J. Watt	
Industrial Health Foundation (But not Industrial Hygiene Foundation)	1974-1981 (budget cut-backs forced United States Gypsum Company to drop membership)	No business meetings Some "discussionals" Asbestos was discussed at the following meetings: Introduction to Industrial Hygiene Asbestos Sampling Chemicals for Industrial Hygiene C. Roe 1978-1979 Toxicology Chemicals and Engineering S. H. Berning - 1/10/79 - 1/21/79	<u>Industrial Hygiene Digest</u> <u>Monthly Abstracts -</u> 1/74 - 12/81 (JDC's) Annual Business Report (JDC's)

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE FROM UNITED STATES GYPSUM COMPANY</u>
		Industrial Hygiene Techniques Update, Advanced Industrial Hygiene S. H. Berning - 11/12/79 - 11/14/79	
		Seminar Regarding Industrial Health J. D. Cornell - 6/8/75 - 6/9/75	
		Other personnel involved: J. D. Cornell, S. H. Berning, K. S. Freeman, C. Roe	
Lime Association	exact date unknown	unknown	none
*National Insulation Manufacturers Association (Founded in 1958) (Now TLMA) Thermal Insulation Manufacturers Association	1973-1974 1974-present	unknown none	Minutes produced in litigation (Wm. Simpson deposition) (1958-?) Some mass correspondence letters regarding comm J. D. Cornell was on - health and safety, public information, medical and scientific dated 1978 to present.
National Insulation Contractors Association (Associate Member)	unknown (perhaps 1972-present?)	none	NICA by Laws dated 1971 NICA's 1981 Annual Report
National Safety Council	1914-present	none	Transactions from 1912-1971 records of all presentations and papers produced at Phillip E. Schmidt, deposition and document production April 17, 1984, in <u>Neil W.</u>
National Mineral Wool Association	1943?-1957 mid-1960's mid-1970's	none	none

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE UNITED STATES GYPSUM COMPANY</u>
*Contracting Plaster and Lathers International (Associate Member)	1960-1969	none	Some documents in M. Cook's and J. Edwards
*International Association Wall and Ceiling Contractors (Associate Member)	1970-1976	none	Some documents in M. Cook's and J. Edwards
*Gypsum Drywall Contractors International (Associate Member)	1960-1976 unknown	none	Some documents in M. Cook's and J. Edwards
*Association of Wall and Ceiling Contractors Industries International - Gypsum Drywall Contractors International (Associate Member)	1976-1979	none	Some documents in M. Cook's and J. Edwards
*Association of Wall and Ceiling Contractors Industries International	1980-present	none	
American Society of Safety Engineers	exact dates unknown	unknown	none
American Industrial Hygienists Association	exact dates unknown	unknown	none

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE UNITED STATES GYPSUM COMPANY</u>
Employing Plasterers Association (Associate Member)	present	unknown	none
Metal Lath Association	1950's-1964	unknown	none
Pulp and Paper Institute	1950's-1964	unknown	none
Hardboard Association	1950's-1964	unknown	none
Health and Safety Council of Asbestos Cement Products Association	1967?-1971?	G. R. Krug - 11/19/68 C. P. Kipp (deceased) or L. A. Tobey (deceased) 2/17/70; 2/18/70; 3/19/70; 5/19/70; 11/19/70	November 21, 1968 memo Krug to Kipp re: meeting and various minutes from other meetings.
Asbestos Information Association of North America Unknown if a member.	not a member	none	none
National Bureau of Standards	not a member	1978 - J. D. Cornell, K. S. Freeman (retired) Rockville, MD, jointly sponsored by NBS and NIOSH re: Asbestos and Health	none
American Standards Association (never a member; served on committees) became ANSI - 1969 similar to ASTM (sustaining member)	unknown; involvement at least 15 years ago	unknown	

<u>ORGANIZATION</u>	<u>DATES OF MEMBERSHIP</u>	<u>HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL</u>	<u>DOCUMENTS AVAILABLE UNITED STATES GYPS COMPANY</u>
Asbestos Textile Institute	never a member	none	
SOEH/IOEH	never a member	"Occupational Exposures to Fibrous and Particulate Dust and Their Extensions into the Environment" 12/5/77 - 12/7/77 J. D. Cornell (others?)	none

*Membership information pertaining to these organizations is not available in this defendant's files.

United States Gypsum Company does not and has not belonged to:

Quebec Asbestos Mining Association - QAMA

Asbestos Research Council of England

Public Health Bulletin Service

Plastering and Lath Association

Chicago Plastering Institute

Perlite Institute