PLAINTIFF'S EXHIBIT

UC-5457

DEFENDANT'S EXHIBIT UCC 389

MORGENSTEIN & JUBELIRER LLP
LAURIE K. ANGER (Bar No. 094841)
JOHN J. PETRY (Bar No. 111134)
One Market
Spear Street Tower
Thirty-Second Floor
San Francisco, CA 94105
Telephone: (415) 901-8700
Facsimile: (415) 901-8701

Attorneys for Defendant
GEORGIA-PACIFIC CORPORATION

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

KLAUS BRAUCH and SUSAN BRAUCH, Plaintiffs, v. BONDEX INTERNATIONAL, INC., et al., Defendants.	CASE NO. BC 258 492 COMPLEX ASBESTOS LITIGATION – SUBJECT TO THE GENERAL ORDERS CONTAINED IN THE FILE NO. C 700 000 **GEORGIA-PACIFIC CORPORATION'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES**

PROPOUNDING PARTY: Plaintiff Klaus Brauch

RESPONDING PARTIES: Defendant GEORGIA-PACIFIC CORPORATION

COMES NOW Defendant, Georgia-Pacific Corporation ("Georgia-Pacific"), pursuant to the California Civil Practice Law & Rules, and responds as follows to Plaintiff's Standard Interrogatories, dated October 29, 2001, served via regular mail October 29, 2001.

PRELIMINARY STATEMENT

Effective April 28, 1965, Georgia-Pacific acquired the Bestwall Gypsum Company ("Bestwall") which manufactured among other things, a limited number of products containing asbestos as a constituent ingredient or component (hereinafter asbestos-containing products), and Georgia-Pacific continued the manufacture, sale, and/or

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distribution of such products through its Gypsum Division until the cessation of same at various times thereafter. Prior to its merger with Bestwall, Georgia-Pacific did not manufacture any asbestos-containing products. After its merger with Bestwall, Georgia-Pacific manufactured and/or distributed these products through its Gypsum Division. In 1977, Georgia-Pacific had ceased the manufacture of all of its limited number of asbestos-containing products and since that time has not engaged in any manufacture of such products. It does not now, nor has it since 1977, manufactured any asbestos-containing products. Unless otherwise stated, each response contained herein is limited to the asbestos-containing products that Georgia-Pacific (or Bestwall) manufactured and/or distributed and the time period during which Bestwall and Georgia-Pacific manufactured and/or distributed such products.

Some of the events which may be relevant to the matters inquired into by these Interrogatories occurred more than thirty (30) years ago. Many of the individuals who might have had personal knowledge of the matters to which these Interrogatories relate are deceased or are otherwise unavailable to Georgia-Pacific, and investigations to date indicate that at least some information and documents which might relate to matters inquired into by these requests may have been destroyed pursuant to Georgia-Pacific's or Bestwall's normal record retention policy or are otherwise unable to be found. Georgia-Pacific is engaged in a continuing investigation in an attempt to locate or confirm the absence of such information and Georgia-Pacific also is engaged in a continuing investigation with respect to the matters inquired into by these Interrogatories and/or Requests for Production.

Georgia-Pacific's Responses to these Interrogatories are based on reasonable investigation and are believed to be accurate as of the date made. However, Georgia-Pacific's investigation of matters that may be relevant to its Responses is continuing, and Georgia-Pacific cannot exclude the possibility that it may be able to obtain more complete information or even information which indicates that the Response being supplied is incorrect. In that event, Georgia-Pacific reserves the right to supplement

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these responses in accordance with the requirements of the California Rules of Civil Procedure.

GENERAL OBJECTIONS

Georgia-Pacific objects to Plaintiffs' Interrogatories to the extent that they are overly broad, unduly burdensome, duplicative of other discovery, seek to impose a burden upon Georgia-Pacific which exceeds the permissible scope of discovery under the California Rules of Civil Procedure ("CCP"), and/or seek to obtain information and/or identification of documents which are protected by a privilege claim, including but not limited to the attorney/client privilege and/or work product privilege. See CCP § 2017, et seq.

Georgia-Pacific further objects to this discovery on the basis that the plaintiffs have failed to come forward with any evidence that the plaintiffs were ever exposed to any Georgia-Pacific asbestos-containing product and/or that such exposure caused or contributed in any way to the damages and the disease alleged herein. Absent such required minimum evidence, each and every request is irrelevant and unduly burdensome to Georgia-Pacific. CCP § 2017. Georgia-Pacific also objects to these requests to the extent that they are not limited by relevant scope, time period or to products that are relevant to this case and, therefore, are not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Georgia-Pacific objects to responding to Plaintiff's Interrogatories with regard to any period of time other than 1956-1977, the period during which Georgia-Pacific's Gypsum Division and its predecessor, Bestwall, engaged in the manufacture of the asbestos-containing products allegedly at issue in this litigation, or concerning any facility not involved in the manufacture or sale of such products, on the ground that such information is irrelevant to this litigation and is not reasonably calculated to lead to the discovery of admissible evidence. On the basis of this objection, unless otherwise stated, each Response set out herein is limited to the time period during which Bestwall and the Georgia-Pacific Gypsum Division

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manufactured and/or distributed asbestos-containing products and to the relevant products and facilities.

These objections are applicable to Georgia-Pacific's Response to each and every Interrogatory herein, whether or not specifically stated in such Response.

INTERROGATORY RESPONSES

INTERROGATORY NO. 1:

Please state the full name, present business address, present residence, and capacity or title of the individual answering or signing these Interrogatories on behalf of the answering defendant.

RESPONSE TO INTERROGATORY NO. 1:

Georgia-Pacific objects to Interrogatory No. 1 to the extent that it is overbroad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that no one individual answered these interrogatories. Rather, the responses are the result of many years of investigation and research by current and former employees of and attorneys for Georgia-Pacific. The burden and impracticality of attempting to identify each individual who has contributed to the preparation of these answers over time outweighs any benefit to the parties of such information. The responses, however, have been verified and signed by David R. Fleiner, President of G-P Gypsum Corporation, who is generally familiar with the statements made herein and able to confirm their accuracy based upon information that is available to him.

INTERROGATORY NO. 14:

Have you, at any time, engaged in the processing, marketing and sale of products containing asbestos fibers?

RESPONSE TO INTERROGATORY NO. 14:

As indicated in its preliminary statement, effective April 28, 1965, Georgia-Pacific acquired the Bestwall Gypsum Company ("Bestwall"), which company was incorporated in the State of Maryland with its principal place of business in Paoli, Pennsylvania.

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Bestwall manufactured, among other things, a limited number of products containing asbestos as a constituent ingredient or component (asbestos-containing products), and Georgia-Pacific continued the manufacture, sale and/or distribution of such products through its Gypsum Division until the cessation of same at various times thereafter. Prior to its merger with Bestwall on April 28, 1965, Georgia-Pacific did not manufacture and/or distribute any asbestos-containing products. After its merger with Bestwall, Georgia-Pacific manufactured a limited number of asbestos-containing products until Georgia-Pacific ceased the manufacture of asbestos-containing products at various times subsequent to April 28, 1965 depending on the product but not later than 1977.

INTERROGATORY NO. 15:

If your answer to Interrogatory No. 14 is in the affirmative, please state:

a. The trade or brand name of each such product, mined, manufactured and/or marketed;

b. The dates that each of such products were placed on the market;

c. The dates that each of such products were withdrawn from the market;

d. A description of the physical (i.e., chemical) composition of each such product, including the type of asbestos contained in each such product (i.e., amosite, chrysotile or crocidolite), the quantitative percentage of asbestos in each product, each non-asbestos chemical contained in each such product:

e. A description of the physical appearance of each such product;

f. A detailed description of the intended use of each such product;

g. The name of the manufacturer of each such product;

h. The mining or milling concern from which the raw asbestos fiber was obtained.

RESPONSE TO INTERROGATORY NO. 15:

Georgia-Pacific objects to Interrogatory No. 15 on the ground that it is overly broad and unduly burdensome, and on the ground that it seeks information regarding products which are not at issue in this case, as such information is irrelevant and not

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reasonably calculated to lead to the discovery of admissible evidence. Georgia-Pacific further objects to the extent that this interrogatory seeks information which is proprietary, commercially confidential or sensitive, and/or protected by the trade secret privilege. Subject to and without waiving its objections, Georgia-Pacific provides the following information regarding asbestos-containing products that either Georgia-Pacific or its predecessor, Bestwall Gypsum Co. ("Bestwall"), manufactured and/or sold:

ALL PURPOSE JOINT COMPOUND - Georgia-Pacific first placed All Purpose Joint Compound on the market for national distribution in 1967. Prior to that time, All Purpose Joint Compound may have been available for sale in limited areas. Georgia-Pacific introduced an asbestos-free formula in 1973. The last year Georgia-Pacific sold asbestos-containing All Purpose Joint Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free All Purpose Joint Compound. The compound is a dry white or off-white powder, which is designed to be used in wallboard construction to finish walls and ceilings. The product is packaged in bags. Georgia-Pacific's asbestos-containing All Purpose Joint Compound contained 0-7% chrysotile asbestos.

BEDDING COMPOUND - Bestwall first sold Bedding Compound in 1956, and Georgia-Pacific continued to manufacture Bedding Compound after it acquired Bestwall in 1965. Georgia-Pacific introduced an asbestos-free formula in 1974. The last year that asbestos-containing Bedding Compound was sold by Georgia-Pacific was approximately 1977. Georgia-Pacific continues to sell asbestos-free Bedding Compound. Bedding Compound is a dry white or off-white powder used in wallboard construction to finish walls and ceilings. It is packaged in bags. Georgia-Pacific's asbestos-containing Bedding Compound contained 0-7% chrysotile asbestos.

CENTRAL MIX - The first year that Georgia-Pacific sold Central Mix was 1970. The last year that Georgia-Pacific sold asbestos-containing Central Mix was 1973. Central Mix was a dry white or off-white powder used in wallboard construction to finish walls and ceilings. Central Mix was packaged in bags. Central Mix contained 3-7% chrysotile asbestos.

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DRYWALL ADHESIVE - Georgia-Pacific sold Drywall Adhesive in 1972. The product came in the form of a paste and was designed to attach wallboard to wood studs. Drywall Adhesive was packaged in tubes. Drywall Adhesive contained 0-0.8% chrysotile asbestos.

JOINT COMPOUND - Bestwall first sold Joint Compound in 1956, and Georgia-Pacific continued to manufacture Joint Compound after it acquired Bestwall in 1965. Georgia-Pacific introduced an asbestos-free formula of Joint Compound in 1974. The last year that Georgia-Pacific sold asbestos-containing Joint Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free Joint Compound. Joint Compound is a dry white or off-white powder intended to be used in wallboard construction to finish walls and ceilings. Joint Compound is packaged in bags. Bestwall's and Georgia-Pacific's asbestos-containing Joint Compound contained 0-6% chrysotile asbestos.

KALITE - Bestwall sold Kalite from 1956 to 1959. It was a dry white or off-white powder intended to be used as an acoustical plaster. The product was packaged in bags. Kalite contained 0-2.6 % chrysotile asbestos.

LAMINATING COMPOUND - READY MIX - Georgia-Pacific sold Laminating Compound Ready Mix in 1969. The product came in paste form and was used to laminate wallboard. Georgia-Pacific's laminating compound contained 0-4% chrysotile asbestos.

LITE ACOUSTIC - Bestwall sold Lite Acoustic between 1958 and 1964. The product was a dry white or off-white powder intended for use as an acoustical plaster. Lite Acoustic was packaged in bags. Lite Acoustic contained 25-29.09% chrysotile asbestos.

PATCHING PLASTER - Bestwall first sold Patching Plaster in 1956, and Georgia-Pacific continued to manufacture Patching Plaster after it acquired Bestwall in 1965. Georgia-Pacific removed asbestos from Patching Plaster in 1975. The last year that Georgia-Pacific sold asbestos-containing Patching Plaster was approximately 1976.

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Georgia-Pacific continues to sell asbestos-free Patching Plaster. The product is a dry white or off-white powder that is used to patch certain plasters. It is packaged in bags. Asbestos-containing Patching Plaster contained 0-2% chrysotile asbestos.

READY MIX - Ready Mix was first sold by Bestwall in 1963 and Georgia-Pacific continued to manufacture Ready Mix after it acquired Bestwall in 1965. Asbestos was removed from Ready Mix in 1975. The last year that asbestos-containing Ready Mix was sold was 1977. Georgia-Pacific continues to sell asbestos-free Ready Mix. The product is a paste used in wallboard construction to finish walls and ceilings. Ready Mix packages include boxes, buckets, or pails. Georgia-Pacific's asbestos-containing Ready Mix contained 0-4.6% chrysotile asbestos.

SPACKLING COMPOUND - Bestwall began selling Spackling Compound in 1956, and Georgia-Pacific continued to manufacture Spackling Compound after it acquired Bestwall in 1965, until 1970 or 1971. The product was a dry white or off-white powder used to finish walls and ceilings. It was packaged in bags or boxes. Spackling Compound contained 0-5.5% chrysotile asbestos.

SPEED SET - Bestwall began selling Speed Set, which was also called "One Day," in 1963, and Georgia-Pacific continued to manufacture the product after it acquired Bestwall in 1965. Georgia-Pacific ceased the manufacture of Speed Set in 1974. The product was a dry white or off-white powder used in wallboard construction to finish walls or ceilings. Speed Set was packaged in bags. Speed Set contained 0-6.75% chrysotile asbestos.

TEXTURE - Bestwall/Georgia-Pacific texture was sold under the trade or brand names: Bestex, Wall Texture, Ceiling Texture/Perlite, Ceiling Texture/Vermiculite, and Ceiling Texture/Polystyrene. The first texture was sold by Bestwall in 1956. Georgia-Pacific introduced asbestos-free texture in 1972. The last year in which Georgia-Pacific asbestos-containing texture was sold was approximately 1974. Georgia-Pacific continues to sell asbestos-free texture. Texture is a dry white or off-white powder used to give a textured appearance to walls or ceilings. Texture is packaged in bags.

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Bestwall's and Georgia-Pacific's asbestos-containing Texture contained 0-15% chrysotile asbestos.

TOPPING COMPOUND - Bestwall first sold Topping Compound in 1956, and Georgia-Pacific continued to manufacture Topping Compound after it acquired Bestwall in 1965. Georgia-Pacific introduced asbestos-free Topping compound in 1974. The last year that Georgia-Pacific sold asbestos-containing Topping Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free Topping Compound. The product is a dry white or off-white powder used in wallboard construction to finish walls or ceilings. It is packaged in bags. Bestwall's and Georgia-Pacific's asbestos-containing Topping Compound contained 0-7% chrysotile asbestos.

TRIPLE DUTY JOINT COMPOUND - Georgia-Pacific has sold Triple Duty Joint Compound under the following brand/trade names: Triple Duty Joint Compound, Triple Duty Wallboard Joint Compound, and Triple Duty Joint Compound-Vinyl Based Adhesive. Georgia-Pacific first sold Triple Duty Joint Compound in 1965. Georgia-Pacific introduced asbestos-free Triple Duty Joint Compound in 1974. The last year that Georgia-Pacific sold asbestos-containing Triple Duty Joint Compound was approximately 1977. Georgia-Pacific continues to sell asbestos-free Triple Duty Joint Compound. The product is a dry white or off-white powder used in wallboard construction to finish walls and ceilings. Triple Duty Joint Compound is packaged in bags. Georgia-Pacific's asbestos-containing Triple Duty Joint Compound contained 0-7% chrysotile asbestos.

OTHER/ADDITIONAL INFORMATION - In addition to the products listed above, Georgia-Pacific, through its Distribution Division, may have sold a small number of products containing asbestos that were manufactured by other companies. However, Georgia-Pacific has no specific product information regarding these products. Georgia-Pacific also sold asbestos-containing roof coating rebranded with its name in a very limited geographic area, not including California. In addition, under limited

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circumstances, Georgia-Pacific may have rebranded and sold joint system products manufactured by others with its name.

Additional non-privileged information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiff, Georgia-Pacific will make such non-privileged documents available for inspection and review in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 16:

Have any of the products listed in Interrogatory No. 15 been altered in chemical composition or asbestos type or content since first being marketed?

RESPONSE TO INTERROGATORY NO. 16:

Georgia-Pacific objects to this Interrogatory to the extent that it is overly broad, unduly burdensome and/or oppressive. Georgia-Pacific also objects to the extent this interrogatory seeks information regarding asbestos-containing products to which plaintiff does not allege he was exposed or used. CCP §2017. Subject to and without waiving these objections, Georgia-Pacific states that prior to the first sale of said products, Georgia-Pacific did not know or have any reason to know that any ingredient in any product it manufactured was potentially hazardous. During the time that Georgia-Pacific manufactured a limited number of asbestos-containing products, a variety of performance tests were conducted, which may have made slight changes in the product formulas for performance reasons. When Georgia-Pacific first heard a suggestion that there might be a potential health hazard to persons using asbestos-containing products similar to those manufactured by Georgia-Pacific, it began a reformulation program which resulted in the elimination of asbestos from its asbestos-containing products and/or the removal of certain products from its product lines. Many tests were performed in the course of the reformulation program and asbestos was phased out of this defendant's products over a period of time ending not later than 1977. To the best of Georgia-Pacific's knowledge, the first study in the published medical and scientific literature regarding potential disease

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associated with asbestos-containing products, such as those manufactured by Georgia-Pacific, did not appear until approximately 1975.

Additional non-privileged information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiff, Georgia-Pacific will make such non-privileged documents available for inspection and review in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 17:

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.

RESPONSE TO INTERROGATORY NO. 17:

See Georgia Pacific's objections and response to Interrogatory No. 16, which response is incorporated herein by reference.

INTERROGATORY NO. 22:

Do you have any records which reflect sales of each of the products identified by you in Interrogatory No. 15 above for each year said products were sold?

RESPONSE TO INTERROGATORY NO. 22:

Georgia-Pacific objects to Interrogatory No. 22 to the extent that it is overly broad, unduly burdensome or oppressive and because it is not likely to lead to the discovery of relevant and/or admissible evidence. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that it maintains some records of sales and/or delivery of asbestos-containing products to customers through its distribution centers, although these records may not be complete. Upon request, Georgia-Pacific will make its collection of sales and shipping records for the State of California available for review,

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inspection and/or copying by plaintiff's counsel in Atlanta, Georgia at a time that is mutually agreed upon by the parties.

INTERROGATORY NO. 23:

If your answer to the preceding Interrogatory is in the affirmative, please state:

a. A description of said records or documents sufficient to permit Plaintiff to describe such documents for purposes of a notice to produce or a motion for production of documents;

b. The name, business address and telephone number employer, and job title of the person or persons having present custody of or control over the original of said documents.

RESPONSE TO INTERROGATORY NO. 23:

Georgia Pacific objects to Interrogatory No. 23 on the ground that it is overly broad and unduly burdensome and to the extent that it seeks information which is not relevant nor reasonably calculated to lead to the discovery of admissible evidence in this action. CCP § 2017. Subject to and without waiving these objections, Georgia Pacific refers Plaintiff to its objections and response to Interrogatory No. 22, which is incorporated herein by reference.

INTERROGATORY NO. 24:

For the period 1930 to the present, do you have any written memoranda, specifications or other written materials of any kind or character exist relating to the testing of the health effects of products identified in Interrogatory 15 above? If so, please describe with sufficient particularity to satisfy the requirements of a subpoena duces tecum.

RESPONSE TO INTERROGATORY NO. 24:

Georgia-Pacific objects to Interrogatory No. 24 on the ground that it is overly broad and unduly burdensome. Georgia-Pacific further objects to the extent that this interrogatory seeks information regarding products not at issue in this case, as such information is not relevant nor reasonably calculated to lead to the discovery of

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admissible evidence. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that prior to the first sale of its limited number of asbestos-containing products, Georgia-Pacific did not know or have reason to know that any ingredient in any product it manufactured was potentially hazardous. Accordingly, to the best of Georgia-Pacific's knowledge, it did not conduct any medical tests. During the time that Georgia-Pacific manufactured a limited number of asbestos-containing products, a variety of performance tests were conducted, but these do not appear to be the type of test referenced in this interrogatory. When Georgia-Pacific first heard a suggestion that there might be a potential health hazard to persons using asbestos-containing products similar to those manufactured by Georgia-Pacific, it began a reformulation program which resulted in the elimination of asbestos from its products and/or the removal of certain products from its product lines. Many tests were performed in the course of the reformulation program. Further, to the best of Georgia-Pacific's knowledge, the first study in the published medical and scientific literature regarding potential disease associated with asbestos-containing gypsum based building products, such as those manufactured by Georgia-Pacific, did not appear until approximately 1975.

INTERROGATORY NO. 25:

Did you make any design changes as a result of such tests?

RESPONSE TO INTERROGATORY NO. 25:

Georgia-Pacific objects to Interrogatory No. 25 on the ground that it is overly broad and unduly burdensome. CCP § 2017. Without waiving its objections, Georgia-Pacific refers Plaintiffs to its objections and responses to Interrogatory No. 16 and Interrogatory No. 24, which are incorporated herein by reference.

INTERROGATORY NO. 26:

If so, please state:

a. The nature of the change made, the name, address and job classification of each person in charge of making a change.

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RESPONSE TO INTERROGATORY NO. 26:

Georgia-Pacific refers Plaintiffs to its objections and responses to Interrogatory No. 16 and Interrogatory No. 24, which are incorporated herein by reference.

INTERROGATORY NO. 27:

Have you, at any time, published and/or distributed any brochures, sales literature, pamphlets or other written materials (aside from any caution labels on containers) of any kind or character that contain any warnings, cautions, caveats, or directions concerning the possibility of injury resulting from the use of the products listed in Interrogatory 15 above?

RESPONSE TO INTERROGATORY NO. 27:

Georgia-Pacific objects to Interrogatory No. 27 on the ground that it is overly broad, oppressive, and unduly burdensome. CCP § 2017. Georgia-Pacific also objects to this Interrogatory to the extent that it seeks information which is subject to the attorney-client privilege and/or attorney work product privilege. CCP § 2018. Georgia-Pacific further objects to this Interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. CCP § 2017.

Subject to and without waiving its objections, Georgia-Pacific states that Georgia-Pacific began using caution labels which were affixed to the containers of its asbestos-containing products in 1973 and discontinued labeling when asbestos was eliminated from its products, a process which was completed in 1977. Caution labels were worded in accordance with the recommendations of OSHA as follows:

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CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

Where appropriate, the following additional language appeared on the label:

WHEN MIXING OR SANDING USE APPROVED RESPIRATOR

or

USE APPROVED RESPIRATOR WHEN SANDING

Packaging for the asbestos-containing products which Georgia-Pacific ceased manufacturing prior to 1973 (Kalite, Laminating Compound – Ready Mix, Lite Acoustic, and Spackling Compound) did not contain a caution concerning asbestos content. It is unknown whether Drywall Adhesive packaging included a caution concerning its asbestos content. Product brochures are available for most of the years in which Georgia-Pacific and/or Bestwall Gypsum asbestos-containing products were sold.

Additional information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of corporate documents relating to its asbestos-containing products. At the request of Plaintiff, Georgia-Pacific will make such documents available for inspection and review in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 28:

From 1930 until the present, did the asbestos products manufactured or distributed by you, contain any warnings, cautions, caveats or other statements on the product or its packaging?

RESPONSE TO INTERROGATORY NO. 28:

Georgia-Pacific objects to Interrogatory No. 28 on the ground that it is duplicative of other requests, overly broad and unduly burdensome. CCP § 2017. Without waiving its objections, Georgia-Pacific refers Plaintiffs to its objections and response to Interrogatory No. 27, which is incorporated herein by reference.

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INTERROGATORY NO. 29:

If so, please state:

a. When did the warning first appear?

b. What was the precise wording of the warning, when it first appeared?

c. Was the warning altered, amended or changed in any manner? If so, how and when?

d. Where was the warning located on the product or packaging?

e. When did you become aware of warnings placed on products distributed by other manufacturers or suppliers of asbestos or asbestos containing products?

f. State the manner in which your product is shipped and the type of container in which it is shipped to retailers;

g. State whether any industrial psychologists or human factors engineers were consulted prior to utilizing such warnings, cautions, etc.

RESPONSE TO INTERROGATORY NO. 29:

Georgia-Pacific objects to Interrogatory No. 29 on the ground that it is duplicative of other requests, overly broad and unduly burdensome. CCP § 2017. Without waiving its objections, Georgia-Pacific refers Plaintiffs to its objections and responses to Interrogatory No. 15 and Interrogatory No. 27, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 30:

When did you first receive notice that any person claimed injury as a result of exposure to asbestos or asbestos containing products manufactured and/or sold by you?

RESPONSE TO INTERROGATORY NO. 30:

Georgia-Pacific objects to Interrogatory No. 30 on the grounds that it is vague, ambiguous, and overbroad. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information concerning products not at issue in this case, as such information is irrelevant and not reasonably calculated to lead to the

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discovery of admissible evidence, and to the extent it seeks information that is protected from discovery by the attorney-client privilege and/or the attorney-work product doctrine. CCP §§ 2017 and 2018. Subject to and without waiving these objections, Georgia-Pacific states that it received no claims against it alleging injury caused by exposure to its products containing asbestos as a constituent ingredient or component prior to 1977, the date by which Georgia-Pacific had ceased the manufacture of all asbestos-containing products.

INTERROGATORY NO. 31:

With respect to the claim described in Interrogatory 14, please state:

a. The name and address of the claimant;

b. The date of notice of the claim;

c. A description of the claim, i.e., Workers' Compensation, products liability, etc.;

d. The type of injuries allegedly sustained;

e. The name and address of the attorney who represented the individual making such claim;

f. The style and court number of the claim if any;

g. The resolution of the claim.

RESPONSE TO INTERROGATORY NO. 31:

Georgia-Pacific objects to Interrogatory No. 31 on the ground that it is overly broad and unduly burdensome and to the extent it invades this defendant's employees rights of privacy. Without waiving its objections, Georgia-Pacific refers Plaintiffs to its objections and response to Interrogatory No. 30, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 32:

Do you have policies of insurance that cover the claims that have been made by Plaintiff herein?

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RESPONSE TO INTERROGATORY NO. 32:

Georgia-Pacific objects to Interrogatory No. 32 to the extent that it is overbroad and unduly burdensome. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. Id. Subject to and without waiving these objections, Georgia-Pacific states that coverage for Georgia-Pacific asbestos claims is uncertain. Potential coverage depends upon many factors, such as the particular individual's dates of exposure and dates of disease manifestation. Without specific information for a particular Plaintiff, Georgia-Pacific cannot state what, if any, insurance is available.

INTERROGATORY NO. 33:

If so, please list the names of each insurance carrier with whom you have coverage, the amount of such coverage, and the dates of each such policy.

RESPONSE TO INTERROGATORY NO. 33:

Georgia-Pacific refers Plaintiffs to its Objections and Response to Interrogatory No. 32, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 34:

Please describe in detail the type of packages in which you have sold asbestos material, listing the dates each type of package was used, a physical description thereof, and a description of any printed material or trademark that appeared thereon.

RESPONSE TO INTERROGATORY NO. 34:

Georgia-Pacific refers Plaintiffs to its Objections and Response to Interrogatory No. 15, which is incorporated herein by reference.

INTERROGATORY NO. 35:

For the period 1930 to January 1, 1978, did you receive any reports or communications from your Workers' Compensation insurance carrier or products liability insurance carrier with regard to the hazards incident to use of asbestos containing products? If so, please state who had possession of said reports, the location of said

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reports, and the substance of the contents of said reports, listing for each such report the respective insurance company, its address and the agent signing such correspondence.

RESPONSE TO INTERROGATORY NO. 35:

Georgia-Pacific objects to Interrogatory No. 35 to the extent that it is overbroad and unduly burdensome. CCP § 2017. Georgia-Pacific further objects to this Interrogatory to the extent it seeks information that is protected from discovery by the insurer-insured privilege, the attorney-client privilege, and/or the attorney work product doctrine. CCP § 2018. Georgia-Pacific also objects to this Interrogatory to the extent that it is not limited to the time during which Georgia-Pacific or Bestwall manufactured or sold asbestos-containing products, or to asbestos-containing products that Georgia-Pacific and Bestwall manufactured and/or sold, on the ground that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CCP § 2017.

Subject to and without waiving these objections, Georgia-Pacific states that it has not compiled information that enables it to respond specifically to this Interrogatory. To the extent such information exists and is not privileged, it would be located in the documents previously proffered to Plaintiffs' counsel for inspection and copying.

INTERROGATORY NO. 36:

Have you imported asbestos or asbestos materials since 1930?

RESPONSE TO INTERROGATORY NO. 36:

Georgia-Pacific objects to Interrogatory No. 36 on the ground that it is ambiguous, vague, overly broad and unduly burdensome and to the extent it seeks information regarding products that are not at issue in those cases and years during which neither Bestwall nor Georgia-Pacific manufactured or sold asbestos-containing products, as such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CCP § 2017.

Without waiving its objections, Georgia-Pacific states that it purchased raw asbestos chrysotile fiber from Johns-Manville, Union Carbide and Phillip Carey for use in

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the manufacture of its limited line of products which contained asbestos as a constituent ingredient. Documents relating to Georgia-Pacific's purchases of asbestos fiber are contained in the document collection previously proffered by Georgia-Pacific to Plaintiffs for inspection and copying.

INTERROGATORY NO. 37:

If the answer to the preceding Interrogatory is in the affirmative, please state:

a. From where the asbestos or asbestos materials were imported;

b. How long you have imported asbestos or asbestos materials?

c. Whether you have supplied this imported asbestos or asbestos materials to any of the other defendants since 1945, when these transactions took place and where.

d. Whether any warnings, cautions, caveats, or directions accompanied the materials referred to in subpart (c) above, and the date these first appeared.

RESPONSE TO INTERROGATORY NO. 37:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 36, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 38:

If you have discontinued manufacturing and/or selling any asbestos products, please state the reasons or reasons therefore.

RESPONSE TO INTERROGATORY NO. 38:

Georgia-Pacific objects to Interrogatory No. 38 on the ground that it is overly broad and unduly burdensome. CCP § 2017. Georgia-Pacific also objects to this Interrogatory to the extent it seeks information that is protected from discovery by the attorney-client privilege and/or the attorney work product doctrine. CCP § 2018.

Without waiving its objections, Georgia-Pacific states as follows: In 1970, when Georgia-Pacific received information which suggested a potential health hazard associated with asbestos-containing products used in the building construction industry, Georgia-Pacific immediately began an effort to eliminate asbestos from its products. The reformulation effort was directed by Glenn Wilson, Vice President of the Gypsum & Roofing

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Division. As of 1977, Georgia-Pacific had eliminated asbestos as a constituent ingredient in its products and had ceased the manufacture of asbestos-containing products. Since that time, Georgia-Pacific has not engaged in the manufacture of any such products. Non-privileged documents responsive to this Interrogatory may be contained in the collection of documents previously provided by Georgia-Pacific to Plaintiffs for inspection and copying.

INTERROGATORY NO. 39:

Have any other manufacturers or suppliers of asbestos or asbestos containing products ever furnished you with information as to the state of medical knowledge regarding the connection between asbestos exposure and the contracting of cancer or asbestosis?

RESPONSE TO INTERROGATORY NO. 39:

Georgia-Pacific objects to this interrogatory to the extent that it is vague, ambiguous, overly broad, unduly burdensome and/or oppressive, and to the extent that it seeks information regarding possible circumstances of product use and/or exposure which are dissimilar to and/or have no applicability to the types and/or uses of asbestos-containing products manufactured by Georgia-Pacific and/or to circumstances reasonably anticipated for users of Georgia-Pacific products. CCP § 2017. Georgia-Pacific also objects to the extent this interrogatory seeks information regarding products to which plaintiff does not allege he was exposed or used. CCP § 2017. Georgia-Pacific further objects on the basis that this interrogatory calls for the interpretation of medical and scientific opinions which are clearly of an expert nature.

Subject to and without waiving these objections, Georgia-Pacific states that prior to the first sale of said products, Georgia-Pacific did not know or have any reason to know that any ingredient in any product it made was potentially hazardous. When Georgia-Pacific first heard a suggestion that there might be a potential health hazard to persons using asbestos-containing products similar to those manufactured by Georgia-Pacific, it began a reformulation program which resulted in the elimination of asbestos from its asbestos-containing products and/or the removal of certain products from its product lines. In

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November 1973, testing of asbestos-containing products similar to those manufactured by Georgia-Pacific was conducted through the Gypsum Association in which Georgia-Pacific was a member. The tests were conducted with OSHA approval. The results of the testing are contained in a report dated November 19, 1973 entitled "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds," which was finalized and made available to members in spring 1974. A copy of the report will be made available for review by Plaintiff's counsel at such time and place as is mutually agreed upon by the parties. Further, to the best of Georgia-Pacific's knowledge, the first study in the published medical and scientific literature regarding potential disease associated with asbestos-containing products, such as those manufactured by Georgia-Pacific, did not appear until approximately 1975.

INTERROGATORY NO. 40:

If the answer to the preceding Interrogatory is in the affirmative, please state:

a. What information was furnished to you;

b. The date the information was furnished to you;

c. The names of all parties who furnished the information to you.

RESPONSE TO INTERROGATORY NO. 40:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 39, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 41:

Have any manufacturers or suppliers of asbestos or asbestos containing products furnished you or have you furnished any other manufacturers or suppliers of asbestos or asbestos containing products the results of any research, tests, medical studies or experiments regarding the state of the medical knowledge as to the connection between asbestos exposure and the contracting of cancer or asbestosis, since 1930?

RESPONSE TO INTERROGATORY NO. 41:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 39, which Georgia-Pacific incorporates herein by reference.

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Attorneys at Law
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INTERROGATORY NO. 42:

If the answer to the preceding Interrogatory is in the affirmative, please state:

a. When each took place;

b. Who participated in each;

c. A summary of the content of each documents or communication.

RESPONSE TO INTERROGATORY NO. 42:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 39, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 43:

Have you ever conducted or sponsored or contributed financially to any studies or research to determine if the inhalation of asbestos fibers may be harmful? If so, please state:

a. By whom the research was conducted, giving complete names and addresses;

b. The dates that each such test was conducted;

c. The complete results of each test or study;

d. Whether you will supply copies of reports of the research department pertaining to the use of the corporation of asbestos and their manufactured insulation products, without the necessity of a formal notice to produce or motion to produce documents, and, if so, please attached said copies to your answers to Interrogatories.

RESPONSE TO INTERROGATORY NO. 43:

Georgia-Pacific objects to Interrogatory No. 43 to the extent that it is overbroad, duplicative of other requests and unduly burdensome, and/or is not reasonably calculated to lead to the discovery of admissible evidence, especially to the extent it seeks information concerning products not at issue in this case. CCP § 2017. Georgia-Pacific also objects to this interrogatory to the extent it seeks information pertaining to the process of manufacturing Georgia-Pacific's asbestos-containing products, on the ground that such information is irrelevant and not reasonably calculated to lead to the

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discovery of admissible evidence, because to the best of Georgia-Pacific's knowledge, Plaintiffs do not claim to have been employed at any Georgia-Pacific manufacturing facility or to have been otherwise involved in the manufacture of Georgia-Pacific's asbestos-containing products. CCP § 2017. Finally, Georgia-Pacific objects to this Interrogatory to the extent it seeks information that is protected from discovery by the attorney-client privilege and/or the attorney work product doctrine. CCP § 2018.

Subject to and without waiving its objections, Georgia-Pacific states that it has never been engaged in the business of manufacturing asbestos-containing insulation products. Georgia-Pacific further states as follows: In November 1973, testing of asbestos-containing products similar to those manufactured by Georgia-Pacific was conducted through the Gypsum Association, of which Georgia-Pacific was a member. The tests were conducted with OSHA approval. The results of the testing are contained in a report dated November 19, 1973 entitled "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds," which was finalized and made available to members in spring 1974. A copy of the report will be made available for review by Plaintiff's counsel at a time and place mutually agreed upon by the parties.

INTERROGATORY NO. 44:

State the names and addresses of your chief medical officers from 1930 until the present time, listing the periods of time each such medical officer was employed by you, and in what capacity.

RESPONSE TO INTERROGATORY NO. 44:

Georgia-Pacific objects to Interrogatory No. 44 on the ground that it is vague, ambiguous, overbroad, and unduly burdensome, and to the extent that it seeks information which is not relevant to the issues in this case. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information that pre-dates 1965 when Georgia-Pacific purchased the Bestwall Gypsum Company and began manufacturing asbestos-containing products, and to the extent it seeks information concerning all of Georgia-Pacific's predecessors, successors or subsidiaries, regardless

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of the nature of their business, on the ground that such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in these actions. CCP § 2017.

Subject to and without waiving these objections, Georgia-Pacific states that it has never employed a physician as a medical director as part of its corporate or divisional staff or for the specific purpose of researching asbestos or asbestos-related disease, but defendant has consulted with numerous physicians regarding employee health matters with respect to various manufacturing facilities.

Three industrial hygienists have been employed by the Gypsum Division. Donald Olsen was hired in January 1979 and was replaced by Steven Tochilin in October 1982. Mr. Tochilin was replaced by Rudi Fillingin in April 1988. All were assigned to Georgia-Pacific's corporate headquarters. However, none of these individuals were hired specifically to research, investigate, or study asbestos or asbestos-related diseases.

Additional, non-privileged information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiffs, Georgia-Pacific will make such documents available for review and copying in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 45:

Name the person in the corporate structure to whom the chief medical officer reports, also giving that person's position or job title in the corporation.

RESPONSE TO INTERROGATORY NO. 45:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 44, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 46:

Please state the duties and responsibilities of the corporation's chief medical officer.

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RESPONSE TO INTERROGATORY NO. 46:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 44, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 47:

Please state the names and addresses of all physicians who were employed, retained, or otherwise engaged by you at any of your facilities from the year 1930 until the present time for the purposes of evaluating, diagnosing or treating pulmonary complaints or problems in past, present or prospective employees.

RESPONSE TO INTERROGATORY NO. 47:

Georgia-Pacific objects to this Interrogatory on the ground that it is overly broad and unduly burdensome and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, especially to the extent it seeks information regarding years in which neither Bestwall nor Georgia-Pacific manufactured or sold asbestos-containing products. CCP § 2017. Georgia-Pacific also objects to this interrogatory to the extent it seeks information pertaining to the process of manufacturing Georgia-Pacific products on the ground that such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence because, to the best of Georgia-Pacific's knowledge, Plaintiffs do not claim to have been employed at any Georgia-Pacific manufacturing facility or to have been otherwise involved in the manufacture of Georgia-Pacific asbestos-containing products. CCP § 2017.

Without waiving its objections, Georgia-Pacific states that it never employed a full or part-time physician as part of its corporate or divisional staff. Georgia-Pacific has, however, consulted with numerous physicians regarding employee health matters at various manufacturing facilities. The following physicians contracted with Georgia-Pacific to perform examinations and testing of employees at Georgia-Pacific's joint system facilities.

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Dr. Marvin Amdur, The Industrial Medical Center, Buffalo, New York, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Akron, New York, including chest x-rays and pulmonary function tests, beginning in 1973.

Dr. Uljanov, Genesee Memorial Hospital Association, New York, conducted annual examinations of employees at Georgia-Pacific's Akron, New York facility, including chest x-rays and pulmonary function tests, beginning in 1973.

Dr. Thomas S. Caras, Marietta, GA, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Marietta, GA, including chest x-rays and pulmonary function tests, beginning in 1975.

Dr. Alba, Mary Washington Hospital, Fredericksburg, Virginia, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Milford, VA, including chest x-rays and pulmonary function tests, beginning in 1975.

Dr. Remick, Hammond Clinic, Muster, Indiana, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Chicago, IL, including chest x-rays and pulmonary function tests, in the 1970s.

Dr. Walter A. Brooks, Quanah Clinic, Quanah, Texas, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Acme, TX, including chest x-rays and pulmonary function tests, in 1971.

Dr. P.L. Salkeld, Quanah Clinic, Quanah, Texas, conducted annual examinations of employees at Georgia-Pacific's joint systems facility at Acme, TX, including chest x-rays and pulmonary function tests, in 1973.

INTERROGATORY NO. 48:

Please state the names and addresses of all persons employed by you from 1930 through January 1, 1978 who functioned as industrial hygienists. As contemplated by these interrogatories, an industrial hygienist is one that performs engineering or health studies to identify and evaluate potential occupational health hazards, and suggests

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methods of dealing with same. With respect to each person employed by you as an industrial hygienist, please state:

a. The facility or office to which each was assigned;

b. His or her complete and precise duties and responsibilities.

RESPONSE TO INTERROGATORY NO. 48:

Georgia-Pacific objects to Interrogatory No. 48 on the ground that it is duplicative of other Interrogatories and overly broad, unduly burdensome. CCP § 2017. Without waiving its objections, Georgia-Pacific states that it has never employed a full or part-time physician as part of its corporate or divisional staff or to fulfill specific duties related to asbestos or occupational disease, but Georgia-Pacific has consulted with numerous physicians regarding employee health matters with respect to various manufacturing facilities over the years. For more information on this subject, Georgia-Pacific refers Plaintiffs to its Responses to Interrogatory No. 44 and Interrogatory No. 47, which Georgia-Pacific incorporates herein by reference.

Three industrial hygienists have been employed by the Gypsum Division. Donald Olsen was hired in January 1979 and replaced by Steven Tochilin in October 1982. Mr. Tochilin was replaced by Rudi Fillingin in April 1988. All were assigned to Georgia-Pacific's corporate headquarters. However, none of these individuals were hired specifically to research, investigate, or study asbestos or asbestos-related diseases. To the extent it exists, however, additional information regarding the subject of this Interrogatory may be located in the documents previously provided to Plaintiffs' counsel for inspection and copying.

INTERROGATORY NO. 49:

Did your medical officers, physicians or industrial hygienists at any time, ever make any recommendations and/or suggestions to you pertaining to the risks or hazards to persons involved in the manufacturing or use of insulation products containing asbestos? If so, please state:

a. Where the recommendations were made;

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b. To whom they were made;

c. By whom they were made;

d. The substance of each recommendation

RESPONSE TO INTERROGATORY NO. 49:

See this defendant's objections and responses to Interrogatory Nos. 44, 47 and 48, which are incorporated herein by reference.

INTERROGATORY NO. 50:

Please state the names of trade association periodicals to which you subscribed from 1928 to January 1, 1978. State whether or not during said period, you had any knowledge of any articles being printed in industry trade journals, essays, memoranda, and other similar sources pertaining to the hazardous potentials of asbestos, and please further state which of such articles were received by you.

RESPONSE TO INTERROGATORY NO. 50:

Georgia-Pacific objects to Interrogatory No. 50 to the extent that it is overbroad, unduly burdensome, and unlimited as to time as it would be virtually impossible to identify every association, foundation, or organization of which Georgia-Pacific, its predecessors, and subsidiaries has been a member, particularly to the extent same were not related to the manufacture of asbestos-containing products at issue in this case or to Georgia-Pacific's manufacture of such products. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. Id. Subject to and without waiving these objections, Georgia-Pacific states that it has been a member of the Gypsum Association since 1965. Georgia-Pacific also is/was a member of the American Society for Testing and Materials (ASTM), the Gypsum Drywall Contractors International, the Contract and Plasterers Association, and the International Association of Walls and Ceilings. Additional non-privileged information responsive to this interrogatory may be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiffs,

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Georgia-Pacific will make these documents available for review and copying in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 51:

Name those organizations, groups, inter-company or industrial organizations, their committees or subcommittees, to which you belong which conducted studies or researched relationships, if any, between exposure to asbestos fibers or products and asbestosis and lung cancer, from 1945 to 1970 and the years of your membership.

RESPONSE TO INTERROGATORY NO. 51:

Georgia-Pacific objects to this request on the basis that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that it is unaware of any responsive organizations or groups except to the extent that it was a member of the Gypsum Association and may have received Gypsum Association documents potentially responsive to this request. Upon request of Plaintiff, Georgia-Pacific will make non-privileged, relevant documents, if any exist, available for inspection by counsel for plaintiffs at a mutually agreed-upon time in Atlanta, Georgia. *See also* this defendant's response to Interrogatory No. 50, which is incorporated herein by reference.

INTERROGATORY NO. 52:

Have you received copies of transcribed minutes of the various committee meetings, subcommittee meetings, general meetings and Board of Director meetings of any organization listed in Answer to Interrogatory No. 51 within one year of such meetings?

RESPONSE TO INTERROGATORY NO. 52:

Georgia Pacific objects to Interrogatory No. 52 on the ground that it is vague, confusing, overly broad and unduly burdensome. CCP § 2017. Georgia Pacific further objects to this Interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action. Id. Subject to and without waiving these objections, Georgia Pacific states that non-

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privileged information responsible to this request may be contained in its collection of corporate documents related to its asbestos-containing products. At the request of Plaintiff, Georgia Pacific will make such documents available for review and inspection in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 53:

Please state the amounts you have spent or contributed annually, from 1930 until January 1, 1978, for research specifically directed to the relationship, if any, between an exposure to asbestos containing products and mesothelioma, asbestosis, lung cancer, or any other pulmonary disease.

RESPONSE TO INTERROGATORY NO. 53:

Georgia-Pacific objects to Interrogatory No. 53 on the ground that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and to the extent it seeks information regarding years in which Georgia-Pacific did not manufacture or sell asbestos-containing products. CCP § 2017. Georgia-Pacific also objects to this Interrogatory to the extent it seeks information or documents that are protected from discovery by the attorney-client privilege and/or the attorney work product doctrine. CCP § 2018.

Without waiving its objections, Georgia-Pacific states that as a member of the Gypsum Association, Georgia-Pacific may have contributed to studies or research of the relationship between asbestos exposure and pulmonary abnormalities. However, Georgia-Pacific is unable, based on the information currently available, to quantify or identify any such contributions with specificity. See this defendant's response to Interrogatory No. 50 and Interrogatory No. 51, which responses are incorporated herein by reference.

INTERROGATORY NO. 54:

Please state the amount you have annually contributed through January 1, 1978 to any independent medical research group or groups conducting research into the

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relationship, if any, between exposure of those employees who work with asbestos containing products to asbestos and any pulmonary disease.

RESPONSE TO INTERROGATORY NO. 54:

Georgia-Pacific refers Plaintiffs to its Objections and Response to Interrogatory No. 53, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 55:

Please state the names and addresses of the organizations or groups conducting the studies referred to in your answer to Interrogatories 53 and/or 54 above.

RESPONSE TO INTERROGATORY NO. 55:

Georgia-Pacific objects to Interrogatory No. 55 on the ground that it is overly broad, unduly burdensome, and unlimited as to time, as it would be impossible to identify every association, foundation, or organization of which Georgia-Pacific was a member. CCP § 2017. Georgia-Pacific further objects to this Interrogatory on the ground that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action, especially to the extent it seeks information regarding years in which neither Bestwall nor Georgia-Pacific manufactured or sold asbestos-containing products. Id. Georgia-Pacific also objects to this Interrogatory to the extent it seeks documents or information that are protected from discovery by the attorney-client privilege and/or the attorney work product doctrine. CCP § 2018.

Without waiving its objections, Georgia-Pacific states that at various times, it has been a member of the American Society for Testing and Materials (ASTM), the Gypsum Association, the Gypsum Drywall Contractors International, and the International Association of Walls & Ceilings. To the extent that documents exist pertaining to Georgia-Pacific's membership in these organizations, such documents have been proffered to Plaintiffs' counsel for inspection and copying. Georgia-Pacific's membership in any other organizations is immaterial to this action.

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INTERROGATORY NO. 56:

Have you had a department, division or section devoted to scientific and/or medical research during the period from 1930 until January 1, 1978? If so, please state its title(s) and when it was first formed.

RESPONSE TO INTERROGATORY NO. 56:

Georgia-Pacific objects to this request on the basis that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; that the investigation and preparation of a response to this request would impose an undue burden and expense on Georgia-Pacific; and that the request is vague, duplicative, ambiguous, overly broad and oppressive. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that prior to the first sale of a limited number of asbestos-containing products, Georgia-Pacific did not know or have any reason to know that any ingredient in any product it made was potentially hazardous. Accordingly, to the best of its knowledge, Georgia-Pacific did not conduct any medical tests or studies or research of the type referenced in this interrogatory. When Georgia-Pacific first heard a suggestion that there might be a potential health hazard to persons using asbestos-containing products similar to those manufactured by Georgia-Pacific, it began a reformulation program which resulted in the elimination of asbestos from its asbestos-containing products and/or the removal of certain products from its products line, a process which was completed by 1977. The Research and Development Department of this defendant was primarily involved in the design and preparation of manufacturing specifications for its products and was not created for the purpose of medical testing and/or studies. It is impossible to identify each individual involved in the design of manufacturing specifications for this defendant's limited number of asbestos-containing products, however, the following individuals did participate in the design and preparation of manufacturing specifications and would be familiar with the operations of said department: G.A. Hoygott, Technical Director, 1956-63; Charles Shuttleworth, Director of Research and Quality Control, 1963-67; and C.W. Lehnert,

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Product Development and Technical Services Manager, Gypsum and Roofing Division, 1967-77.

INTERROGATORY NO. 57:

Please state the scientific or medical periodicals to which you, your medical department or industrial hygiene division subscribed during the period between 1930 and 1964, specifying the date such subscriptions were begun.

RESPONSE TO INTERROGATORY NO. 57:

Georgia-Pacific objects to Interrogatory No. 57 to the extent that it is overbroad, oppressive, harassing, and unduly burdensome. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action, particularly to the extent it seeks information on periodicals unrelated to asbestos. CCP § 2017. Subject to and without waiving these objections, as previously indicated, Georgia-Pacific was not involved in the manufacture and/or sale of asbestos-containing products until Georgia-Pacific acquired Bestwall Gypsum Company on April 28, 1965, therefore it has no relevant information responsive to the time frame involved, 1930-1964. *See also* this defendant's objections and responses to Interrogatory No. 44 and Interrogatory No. 56, which are incorporated herein by reference.

INTERROGATORY NO. 58:

Please state whether any of your asbestos containing products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amount of dust exceeding threshold limit values. If so, state:

a. When these instructions were given;

b. By whom these instructions were given;

c. Whether the instructions were oral or written;

d. The precise content of the instructions;

e. If the instructions were written, please attached a copy of the instructions

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RESPONSE TO INTERROGATORY NO. 58:

Georgia-Pacific objects to Interrogatory No. 58 to the extent that it is overbroad and unduly burdensome. Georgia-Pacific also objects to the extent this interrogatory requires the interpretation of medical and/or scientific data. CCP § 2017. Subject to and without waiving these objections, Georgia-Pacific states that Georgia-Pacific began using caution labels which were affixed to the containers of its asbestos-containing products in 1973 and discontinued labeling when asbestos was eliminated from its products, a process which was completed in 1977. Caution labels were worded in accordance with the recommendations of OSHA as follows:

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

Where appropriate, the following additional language appeared on the label:

WHEN MIXING OR SANDING USE APPROVED RESPIRATOR

or

USE APPROVED RESPIRATOR WHEN SANDING

Georgia-Pacific further states that its product containers and product brochures have always included instructions for the appropriate use of the particular product(s). Relevant, non-privileged documents responsive to this interrogatory will be made available for review by Plaintiff's counsel in Atlanta, Georgia at such time and place as is mutually agreed upon by the parties.

INTERROGATORY NO. 59:

Did any representatives of yours attend the 20th annual meeting of the IHF in November, 1955, in Pittsburgh, Pennsylvania? If so, give the name and current address of each such attendee.

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RESPONSE TO INTERROGATORY NO. 59:

Georgia-Pacific states that it is not now and never has been a member of the Industrial Hygiene Foundation. Further, neither Georgia-Pacific nor its predecessor, Bestwall, were involved in the manufacture of asbestos-containing products in 1955.

INTERROGATORY NO. 60:

Have you received a copy or copies of the Industrial Hygiene Digest published monthly by the IHF, and if so, state the date of initial receipt of such publication.

RESPONSE TO INTERROGATORY NO. 60:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 59, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 61:

Have you ever requested IHF officials to:

a. Perform a search of the medical literature to determine whether any scientists or doctors were reporting cases of asbestosis and/or lung cancer in ship workers, mechanics, or others working with or exposed to asbestos containing products, or discussing the potential hazards incident to use of asbestos containing products;

b. Perform any studies or research into potential health hazards incident to the use of asbestos containing products;

c. Review governmental publications of Great Britain for determining whether research was being conducted by the British governmental into any potential health hazards incident to the use of insulation products containing asbestos;

d. Review governmental publications of Great Britain to determine whether the Chief Inspector of Factories, or any other British governmental agency, had issues any regulations or published any findings relative to any potential health hazard incident to the use of insulation products containing asbestos.

RESPONSE TO INTERROGATORY NO. 61:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 59, which Georgia-Pacific incorporates herein by reference.

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INTERROGATORY NO. 62:

Did you at any time prior to January 1, 1980 warn any labor union representing ship workers, mechanics, or others working with or exposed to asbestos containing products, of any potential health hazards from the use of insulation products containing asbestos?

RESPONSE TO INTERROGATORY NO. 62:

This defendant has never been engaged in the manufacture of asbestos-containing insulation products. Further, this defendant did not manufacture asbestos-containing products suitable for use by those involved in the maritime or shipbuilding industry. *See* also this defendant's response to Interrogatory No. 58, which is incorporated herein by reference.

INTERROGATORY NO. 63:

If the answer to the preceding Interrogatory is in the affirmative, please state:

a. The name of the union;

b. How said union was informed;

c. The date and placed of said information or warning;

d. The content and nature of said warning;

e. The individual or individuals warned.

RESPONSE TO INTERROGATORY NO. 63:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 62, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 64:

State the name of all persons who have acted in the capacity of medical librarian for you from 1930 to January 1, 1978, give their current address, telephone number, and current position with the company.

RESPONSE TO INTERROGATORY NO. 64:

Georgia-Pacific objects to Interrogatory No. 64 on the ground that it is overly broad and unduly burdensome. CCP § 2017. Georgia-Pacific further objects to this

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Interrogatory on the ground that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence in this action, especially to the extent it seeks information regarding years in which neither Bestwall nor Georgia-Pacific manufactured or sold asbestos-containing products. Id. Subject to and without waiving its objections, Georgia-Pacific states that it has never maintained a medical library. Therefore, this defendant did not employ a medical librarian from 1930 to January 1, 1978. At one time, Georgia-Pacific maintained a general library, which library was dismantled in 1994. The general library, however, was not created or maintained as a medical or scientific library, and Georgia-Pacific currently has no reliable records of the materials that may have been contained in the library.

INTERROGATORY NO. 65:

State whether you ever subscribed to or received copies of the Asbestos Worker magazine and state the years of subscription or receipt of this magazine.

RESPONSE TO INTERROGATORY NO. 65:

Georgia-Pacific never subscribed to or received copies of the Asbestos Worker magazine during the time that it manufactured a limited number of asbestos-containing products. See also this defendant's objections and response to Interrogatory No. 64, which is incorporated herein by reference.

INTERROGATORY NO. 66:

Please state whether you subscribe to the Asbestos magazine, and list the inclusive dates of your subscription.

RESPONSE TO INTERROGATORY NO. 66:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 65, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 67:

Please identify all booklets, manuals, journals, and all publications directed from you prior to January 1, 1980 to customers and users of all asbestos containing products

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and the dates said information was forwarded regarding the proper use and application of your asbestos containing products.

RESPONSE TO INTERROGATORY NO. 67:

Georgia-Pacific objects to Interrogatory No. 67 on the ground that it is overly broad, unduly burdensome, duplicative of other discovery requests and to the extent it seeks information regarding products that are not at issue in this case, as such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CCP § 2017. Subject to and without waiving its objections, Georgia-Pacific states that it began using caution labels which were affixed to the containers of its asbestos-containing products in 1973 and discontinued the use of such labels when asbestos was eliminated from its products, a process that was completed in 1977. Caution labels were worded in accordance with the recommendations of OSHA as follows:

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

Where appropriate, the following additional language appeared on the label:

WHEN MIXING OR SANDING USE APPROVED RESPIRATOR

Or

USE APPROVED RESPIRATOR WHEN SANDING

Georgia-Pacific further states that its product containers and product brochures have always included instructions for the appropriate use of the particular product(s).

Additional non-privileged information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of corporate documents related to its asbestos-containing products. At the request of Plaintiffs, Georgia-Pacific will make such documents available for review and copying in Atlanta, Georgia, at a mutually agreeable time.

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INTERROGATORY NO. 68:

Please describe and identify all tests and experiments conducted by you prior to January 1, 1980 to determine whether or not asbestos fibers contained within your asbestos containing products would become airborne upon their being applied by asbestos workers or helpers. Please state the dates of all tests and experiments, the results, and conclusions of each test and/or experiment.

RESPONSE TO INTERROGATORY NO. 68:

Georgia-Pacific objects to this Interrogatory on the ground that it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, to the extent it seeks information regarding products and circumstances of use that are not at issue in this case. CCP § 2017. Georgia-Pacific also objects to this Interrogatory to the extent that it seeks information which is protected from discovery by the attorney-client privilege and/or the attorney work product doctrine. CCP § 2018.

Subject to and without waiving its objections, Georgia-Pacific states that in November, 1973, testing of asbestos-containing products similar to those manufactured by Georgia-Pacific was conducted through the Gypsum Association in which Georgia-Pacific was a member. The tests were conducted with OSHA approval. The results of the testing are contained in a report dated November 19, 1973 entitled "Evaluation of Exposure to Asbestos During Mixing and Sanding of Joint Compounds," which was finalized and made available to members in the spring of 1974. Non-privileged documents relating to the subject matter of this Interrogatory are contained in the documents previously proffered by Georgia-Pacific to Plaintiffs' counsel for inspection and copying.

INTERROGATORY NO. 69:

At any time prior to 1964, were any tests or studies conducted or sponsored by you to determine:

a. The level of dust or fiber concentrations incident to:

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i. Cutting or sawing your insulation products containing asbestos;

ii. In placing the product on (1) pipes; (2) boilers;

iii. Tearing down the product during repair and maintenance functions;

iv. Mixing asbestos containing products.

b. Whether long term (20 years or more) exposure to insulation products containing 15% asbestos or less for work periods less than 8 hours a day, both indoors and outdoors, which resulted in the liberation of asbestos dust or fiber below 5 million particle per cubic foot (mppcf) might cause asbestosis or expose such worker to an increased statistical risk of contracting;

i. Brochogenic cancer;

ii. Mesothelioma (pleural or periotoneal);

iii. Gastrointestinal cancer.

RESPONSE TO INTERROGATORY NO. 69:

Georgia-Pacific did not manufacture any asbestos containing products prior to April 28, 1965 when it acquired Bestwall Gypsum Company. Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 24 and Interrogatory No. 68, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 70:

State the date and the source from which you received your first notice and awareness of TLV's pertaining to the concentration of airborne asbestos fibers.

RESPONSE TO INTERROGATORY NO. 70:

Georgia-Pacific objects to Interrogatory No. 70 on the ground that it is overly broad and unduly burdensome. CCP § 2017. Georgia-Pacific further objects to this interrogatory on the ground that it involves the definition of "threshold limit values," a scientific term that is more appropriately addressed by expert witnesses. Id. Subject to and without waiving these objections, Georgia-Pacific states that it has been generally aware of the TLV recommendations for asbestos, made by the American Conference of Governmental Industrial Hygienists, and of those recommendations adopted by the U.S.

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Government. This information was obtained by Georgia-Pacific through numerous means, including the gathering of information by its Gypsum Division Safety Director and through publications of the United States Government. Georgia-Pacific further states that additional non-privileged information responsive to this Interrogatory may be contained in its collection of corporate documents relating to its asbestos-containing products. At the request of Plaintiff, Georgia-Pacific will make such documents available for review and inspection in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 71:

Between 1930 and 1978, did you hear from any source of an alleged association between asbestos exposure and the development of cancer, asbestosis and pulmonary disease?

RESPONSE TO INTERROGATORY NO. 71:

Georgia-Pacific objects to this interrogatory on the ground that it is overly broad, unduly burdensome and duplicative of other discovery requests. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information regarding products which are not at issue in this case, as such information is not relevant nor reasonably calculated to lead to the discovery of admissible evidence in this action. Id.

Subject to and without waiving its objections, Georgia-Pacific states that beginning in the late 1960's, it became aware of potential health hazards to persons who worked in industries unrelated to commercial and residential construction, who were exposed to certain types of asbestos fibers and/or asbestos in substantial quantities. At or about the same time, Georgia-Pacific became aware of disputes within the medical or scientific community as to whether and under what circumstances breathing asbestos dust could cause or contribute to asbestosis, mesothelioma, or lung cancer. These medical and scientific disputes continued throughout the time Georgia-Pacific was engaged in the manufacture of asbestos-containing products and, indeed, continue today. To the best of Georgia-Pacific's knowledge, the first study in the published

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medical and scientific literature regarding potential diseases associated with gypsum based asbestos-containing drywall, joint system products such as those manufactured by Georgia-Pacific for use in residential and commercial buildings, did not appear until approximately 1975.

Additional non-privileged information responsive to this Interrogatory may be contained in Georgia-Pacific's collection of documents relating to its asbestos-containing products. At the request of Plaintiff, non-privileged documents responsive to this interrogatory will be made available for inspection in Atlanta, Georgia, at a mutually agreeable time.

INTERROGATORY NO. 72:

State when your knowledge as to the alleged association between the inhalation of asbestos fibers and contraction of cancer and asbestosis was first acquired, and state the source of that information.

RESPONSE TO INTERROGATORY NO. 72:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 71, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 73:

Do you subscribe to the United States Public Health Bulletin Service? If so, please state the date when you first so subscribed to the Public Health Service Bulletin.

RESPONSE TO INTERROGATORY NO. 73:

See this defendant's objections and response to Interrogatory No. 64, which is incorporated herein by reference.

INTERROGATORY NO. 74:

Please state the date when, if ever, you first notified your employees working in your manufacturing plants and factories as to the need to wear and use respirators.

RESPONSE TO INTERROGATORY NO. 74:

Georgia-Pacific objects to Interrogatory No. 74 on the basis that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of

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this litigation nor reasonably calculated to lead to the discovery of admissible evidence. CCP § 2017. Georgia-Pacific further objects to this interrogatory to the extent that it seeks information regarding the manufacturing process of Georgia-Pacific products on the basis that to the best of Georgia-Pacific's knowledge, the Plaintiffs in this litigation have not claimed to have been employed by Georgia-Pacific at any of its plants where asbestos-containing materials were manufactured and no plaintiff herein claims to have been otherwise involved in the manufacture of this defendant's products. CCP § 2017.

INTERROGATORY NO. 75:

Please state the date when you first notified asbestos workers applying your asbestos insulation products as to the need to wear and use respirators.

RESPONSE TO INTERROGATORY NO. 75:

This Interrogatory does not appear to be applicable to this defendant. Georgia-Pacific has never been engaged in the manufacture of asbestos-containing insulation products.

INTERROGATORY NO. 76:

Have you ever published bulletins warning your employees concerning the hazards of inhaling asbestos and coming into contact with your asbestos containing products? If so, describe sufficiently for purposes of a notice to produce all such bulletins.

RESPONSE TO INTERROGATORY NO. 76:

Georgia-Pacific refers Plaintiffs to its Objections and Responses to Interrogatory No. 74, which Georgia-Pacific incorporates herein by reference.

INTERROGATORY NO. 77:

Have any of your officers, agents, servants or employees ever testified before any governmental body regarding the possible harmful effects of asbestos exposure? If so, please state:

a. When you where such testimony was given;

b. A summary of said testimony;

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c. If said testimony was recorded, and if so, attach a copy to the answer to these Interrogatories.

RESPONSE TO INTERROGATORY NO. 77:

Georgia-Pacific objects to this Interrogatory on the ground that it is overly broad and unduly burdensome and seeks information that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, especially to the extent it seeks information regarding cases, allegations, products, or circumstances of product use that are not at issue in these cases. CCP § 2017. Georgia-Pacific also objects to this Interrogatory on the ground that it seeks information which is available in the public domain and is as easily accessed by Plaintiffs from other sources as by Georgia-Pacific. Id.

Subject to and without waiving these objections, Georgia-Pacific states that it is aware of no testimony by Georgia-Pacific employees or officers before a congressional committee or governmental agency or body on the subject of the possible harmful effects of asbestos exposure.

This defendant reserves the right to modify, alter, amend and/or supplement these responses to Plaintiffs' Standard Interrogatories as deemed necessary by this defendant and/or as is required by the California Rules of Civil Procedure.

Dated: November 2, 2001

MORGENSTEIN & JUBELIRER LLP

By: _____
JOHN J. PERRY
Attorneys for Defendant
GEORGIA-PACIFIC CORPORATION

MORGENSTEIN & JUBELIRER LLP
ATTORNEYS AT LAW
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

KLAUS BRAUCH and SUSAN BRAUCH, Plaintiffs, vs. BONDEX INTERNATIONAL, INC., et al., Defendants.	Case No. BC 258 492 VERIFICATION

David R. Fleiner, being duly sworn, deposes and says that he is an authorized agent of Georgia-Pacific Corporation; that he verifies the foregoing Defendant Georgia-Pacific Corporation's Objections And Responses To Plaintiff's Standard Interrogatories; that the matters stated therein are not within the personal knowledge of the deponent; that the facts therein have been assembled by authorized employees and counsel for Georgia-Pacific Corporation; and that the deponent is informed that the facts stated therein are true.

David R. Fleiner, President
G-P Gypsum Corporation

SUBSCRIBED AND SWORN to before me this 6th day of November, 2001

NOTARY PUBLIC

My commission expires: 4/11/05

PROOF OF SERVICE

I, MARVIS J. ONG, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is One Market, Spear Street Tower, Thirty-Second Floor, San Francisco, CA 94105. On November 13, 2001, I served the within documents:

GEORGIA-PACIFIC CORPORATION'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S STANDARD INTERROGATORIES

☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.

☐ by placing the document(s) listed above in a sealed _____ envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a _____ agent for delivery.

☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

SEE ATTACHED LIST

WATERS & KRAUS, LLP
200 Oceangate, Suite 520
Long Beach, CA 90802

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 13, 2001, at San Francisco, California.

MARVIS J. ONG

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LASC, No. BC 258 492

McKenna & Cuneo
444 South Flower Street
Los Angeles, CA 90071-2901
Attorneys for Union Carbide Corp.

Howard, Rome, Martin and Ridley
643 Bair Island Road
Redwood City, CA 94063
Attorneys for The Synkoloid Co.

Prentice Hall Corporation
800 Brazos Street, Suite 750
Austin, Texas 78701
Attorneys for Congoleum Corp.

Waters & Kraus, LLP
200 Oceangate, Suite 520
Long Beach, CA 90802
Attorneys for Plaintiff

Freeburg, Judy & Nettels
600 So. Lake Ave., 2nd Fl.
Pasadena, CA. 91106-3955
Attorneys for Flintkote

The Prentice-Hall Corporation System, Inc.
2730 Gateway Oaks Dr., Suite 100
Sacramento, CA 95833
Attorneys for Bondex International, Inc.

Patrick T. McDonald
987 Commercial Street
San Carlos, CA 94070
Attorneys for Kelly-Moore Paint Co.

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