IN THE CIRCUIT COURT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO. 85-10770



JOHN DIKUN and CHERYL DIKUN,

Plaintiffs,

vs.

ARMSTRONG WORLD INDUSTRIES, INC., et al.,

Defendants.
_____/

NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES

Defendants, OWENS-ILLINOIS and U. S. GYPSUM, through counsel, hereby serve their answers to interrogatories propounded by Plaintiffs.

I HEREBY CERTIFY that a true copy hereof has been furnished to all counsel of record this 8th day of September, 1986.

_____
ROBERT A. HANNAH, of
Hannah, Marsee, Beik & Voght
Post Office Box 536487
Orlando, Florida 32853
(305) 849-1122
Attorney for OI and USG

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/1

DEFINITIONS AND INSTRUCTIONS

1. The words "writing" and "document" are used herein in their broadest sense, and include any original reproduction or copy of any kind of written or documentary material, including, without limitation, correspondence, memoranda, inter-office communications, notes, diaries, contracts, documents, drawings, plans, specifications, estimates, vouchers, permits, written ordinances, minutes of meetings, invoices, billings, checks, reports, studies, telegrams, notes of telephone conversations, and notes of any and all communicatons and other means of recording any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols or combinations thereof.

2. Whenever any writing must be described or identified, all writings in the possession or control of the Defendant are included, and all such writings shall be identified by date, authority, addresses, titles, subjects, title of document (contract, invoice, record, letter, or other identifying designation), number and physical description.

3. You are requested to furnish all information in your possession and all information available to you and not merely such information as you know of your personal knowledge, or from buisness records, but also all knowledge that is available to you, your employees, officers and agents, by reason of inquiry including inquiry of their representatives.

4. If you are unable to answer the following interrogatories completely, answer to the extent possible, specifically stating whatever information or knowledge you have concerning the unanswered portion.

5. As used herein "you" and "your", unless otherwise specified, means the Defendant corporation answering these interroga-

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/2

tories, its subsidiaries and predecessors, its present and former officers, executives, directors, agents and employees and all other persons acting or purporting to act on behalf of the Defendant corporation or its subsidiaries or predecessors.

6. The term "Defendant's predecessor", is used in its broadest sense and includes all corporations or other entities identified in Answer to Interrogatory No. 7a.

7. The term "conducting business", is not limited to asbestos related business.

INTERROGATORIES

1. Please state the name, address and job title of each person who has been supplied information used in answering these interrogatories.

ANSWER: This defendant has responded to numerous discovery requests for information similar to that which is requested herein. As a result, this defendant has accumulated general information, the source of which is no longer identifiable.

2. Please state whether or not you are a corporation; if so, please state your correct corporate name, the state of your incorporation and the address of your principal place of business.

ANSWER: United States Gypsum Company: Delaware
101 South Wacker Dr.
Chicago, Il 60606

3. Please state whether or not Defendant has ever held a certificate of authority to do business in the State of Florida and/or has ever regularly conducted business in Florida.

ANSWER: This defendant has held a certificate of authority to do business in the State of Florida and has regularly conducted business in Florida.

4. If so, please state the date or dates on which such certificate of authority was obtained and/or during which such business was regularly conducted in Florida.

ANSWER: Since 1937.

5. Please describe the corporate history of the Defendant.

ANSWER:

NAME	INCORORATED	DISSOLVED
United States Gypsum Co.	12/27/01; NJ	8/23/20
Avery Gypsum Co.	8/23/20; NJ	10/14/27
United States Gypsum Co.	8/12/20;IL	12/24/36
United States Gypsum Co.	12/24/36;DE	8/52
United States Gypsum Co.	8/52; IL	2/4/66
United States Gypsum Corp.	2/4/66; DE	7/1/66
United States Gypsum Co.	7/1/66; DE	---

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/4

6. Please state whether or not the Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liablilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining of asbestos or the manufacturing, marketing or distributing of asbestos products).

ANSWER: United States Gypsum Co. acquired the assets of National Asbestos Manufacturing Company in 1936. National Asbestos Manufacturing Co. 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 Co. 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.

6a. Please produce the documents evidencing the transactions and/or acquisitions mentioned in Interrogatory No. 6.

ANSWER: Available documents, to the extent that they exist, are in the possession of this defendant's Secretarial Department.

7. If so, please state the following:

a. The name of each such corporation or entity;

ANSWER: (a-f) See this defendant's Response to Interrogatory No. 6.

b. The manner in which each such corporation or entity, or interest therein, was acquired (e.g., purchase, merger, change of name, transfer or purchase of assets or product line);

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/5

c. The date of each such acquisition;

ANSWER:

d. The state in which each such acquisition was effected;

ANSWER:

e. The state law governing each such acquisition if specified by contract; and

ANSWER:

f. The state of incorporation and principal place of business of each corporation acquired or of each corporation in which an interest was acquired.

ANSWER:

8. Please state whether or not Defendant has any subsidiary companies (such companies being limited to those engaged in the mining of asbestos or the manufacturing, marketing or distributing of asbestos products).

ANSWER: United States Gypsum Company has no subsidiary companies.

9. If so, please state the name of each company.

ANSWER: N/A

10. Has Defendant, Defendant's predecessors or any of Defendant's subsidiary companies at any time engaged in the manufacture and/or sale of commercial and/or industrial products containing asbestos fibers?

ANSWER: Yes.

11. Has Defendant, Defendant's predecessor or any of Defendant's subsidiary companies, at any time, engaged in the mining of asbestos and subsequent sale of commercial and/or industrial products containing asbestos fibers?

ANSWER: This defendant has never mined asbestos.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/7

12. Has Defendant, Defendant's predecessor or any of Defendant's subsidiary companies, at any time, engaged in the marketing, distribution, or sale of commercial and/or industrial products containing asbestos fibers?

ANSWER: Yes.

13. If the answer to one or more of the last five questions is in the affirmative, please state as to each affirmative answer the following:

a. The name of the company manufacturing, mining, marketing, distributing or selling such products.

ANSWER: United States Gypsum Company. This defendant has never mined asbestos.

b. The trade or brand name of each such product mined, manufactured, distributed, marketed or sold during the period 1935 to the present.

ANSWER: (b-d) See attached Exhibit 1.

c. The date each of such products was placed on the market.

ANSWER:

d. The date each of such products was withdrawn from the market.

ANSWER:

e. A description of the physical (the chemical) composition of each such product including the type of asbestos contained in each such product (e.g., amosite, chrysotile, or crocidolite) and the quantitative percentage of asbestos in each product.

ANSWER: Objection. This defendant objects to this Interrogaroty on the basis of confidential trade secrets. Without waiving this objection, this defendant used chrysotile asbestos in its asbestos-containing products. See attached Exhibit 2.

f. A description of the physical appearence of each such product.

ANSWER: See attached Exhibit 3.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/9

g. A detailed description of the intended use of each such product.

ANSWER: See attached Exhibit 1.

h. The name of the manufacturer of each such product.

ANSWER: See attached Exhibit 1.

i. The name of the supplier of any raw asbestos fibers and/or asbestos containing products used in the manufacture of each such product.

ANSWER: See attached sheet.

14. Does Defendant or any of its subsidiary companies claim that any patent would ever cover any product listed above in answer to Interrogatory No. 13(b)?

ANSWER: This defendant does not maintain its patent files in such a manner as would facilitate retrieval of this information.

15. If so, for each such product, please state:

a. The number of each patent.

ANSWER: See this defendant's Response to Interrogatory No. 14.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/10

ANSWER TO NO. 13 i.

The following are known to have been approved suppliers of asbestos: Canadian Johns-Manville, Lake Asbestos of Quebec, Nicolet Industries, Carey Canadian, and Asbestos Corporation. It is unknown which source of supply was used on any particular product, which mines the raw asbestos was mined from and which locations the raw asbestos was shipped from. This defendant has located no documentation to ascertain from whom asbestos was specifically purchased proir to 1973. For the years 1973 through 1976, additional asbestos suppliers to this defendant were Atlas Asbestos, Union Carbide, Pacific Asbestos, Johns Manville and Carey Canada; Atlas Asbestos and Pacific Asbestos shipped only to California. This defendant used chrysotile asbestos in its products which contained asbestos.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/11

b. The date same was issued.

ANSWER:

c. The number of each patent application that is pending.

ANSWER:

16. Have any of the products listed above in answer to Interrogatory No. 13(b) been altered in chemical composition since first being marketed?

ANSWER: Objection, This defendant objects to this Interrogaroty 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 these minor changes.

17. If so, please state:

a. The trade name of each such product.

ANSWER: N/A

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/12

b. The date each such product was altered.

ANSWER:

c. The nature of the alteration.

ANSWER:

d. The reason for the alteration.

ANSWER:

18. What is the name, address, and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed above in answer to Interrogatory No. 13(b)?

ANSWER: Objection. This defendant objects to this Interrogatory as being overbroad and burdensome. This defendant employed thousands of people since its inception and it would be impossible to determine "the name, address, and the job title of each individual who participated in the design and preparation of manufacturing specifications for each such product." Wotjpit waiving this objection, see this defendant's Response to Interrogatory No. 19.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/13

19. Do any written memoranda, specifications, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the products listed in answer to Interrogatory No. 13(b).?

ANSWER: See attached sheet.

20. If so, please:

a. List each such written material or document.

ANSWER: See this defendant's Response to Interrogatory No. 19.

b. Identify the person or persons presently in possession of each document.

ANSWER:

c. State where each such document is located.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/14

ANSWER TO NO. 19.

This information may be derived from operating bulletins and research reports which are regularly maintained business records of United States Gypsum Company. The burden of deriving or ascertaining the answers is substantially the same for the party serving these interrogatories as it is for United States Gypsum Company. Accordingly, United States Gypsum Company will afford plaintiff the opportunity to examine the relevant operating bulletins and research reports at a mutually convenient time through its offices at 101 South Wacker Dr. Chicago, IL.
Some of these documents contain confidential research, developemnts, and commercial information. Accordingly, the relevant research reports will be made available for plaintiff's inspection and copying only pursuant to an appropriate confidentiality stipulation and protective order, through United States Gypsum Company's offices at 101 South Wacker Drive, Chicago, IL .

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/15

21. Prior to releasing the products listed in Interrogatory No. 13(b) to the public for sale, were any tests conducted on same to determine the potential health hazards involved in the use of materials contained therein?

ANSWER: Objection. This defendant objects to this Interrogatory as being overbroad and burdensome in that it is not limited to asbestos, the focus of this litigation.

22. If so, please state:

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

ANSWER: N/A See this defendant's Response to Interrogatory NO. 21.

b. The results of such tests.

ANSWER:

23. Do any written memoranda, specifications, blueprints, or other materials of any kind or character exist relating to the testing of said products?

ANSWER: Objection. This defendant objects to this Interrogatory as being overbroad and burdensome in that it is not limited to asbestos, the focus of this litigation.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/16

24. If so, please:

a. List each such written material or document.

ANSWER: N/A See this defendant's Response to Interrogatory No. 23.

b. Identify each person who presently has possession of each such document.

ANSWER:

c. State where each such document is located.

ANSWER:

25. Were any design changes made as a result of such tests?

ANSWER: N/ A See this defendant's Response to Interrogatory No. 23.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/17

26. If so, please state:

a. The nature of the change made.

ANSWER: N/A See this defendants Response to Interrogatory No. 23.

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

ANSWER:

27. After releasing the products listed in answer to Interrogatory No. 13(b) 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 being overbroad and burdensome in that it is not limited to asbestos, the focus of this litigation. Without waiving said objection, this defendant is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds. These tests were not specifically conducted "to determine potential health hazards involved in the use of materials contained therein".

28. If so, please state:

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

ANSWER: N/A See this defendant's Response to Interrogatory No. 27.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/18

b. The results of said tests.

ANSWER:

29. Do any written memoranda, specifications, recommendations or any other written materials of any kind or character relating to the potential health hazards of the said products exist?

ANSWER: See attached Exhibit 4.

30. If so, please:

a. List each such written material or document.

ANSWER: See this defendant's Response to Interrogatory No. 29.

b. Identify each person who presently has possession of each such document.

ANSWER: (b-c) This defendant's Legal Department.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/19

c. State where each such document is located.

ANSWER:

31. Were any design changes made as a result of such tests?

ANSWER: See this defendant's Response to Interrogatory No. 25.

32. If so, please state:

a. The nature of the change made.

ANSWER: See this defendant's Response to Interrogatory No. 26.

b. The name, address and job classification of each person responsible for making such a change.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/20

33. Has Defendant, Defendant's predecessor or any of Defendant's subsidiary companies, at any time, published, and/or distributed any brouchures, pamphlets, packagings or other written materials of any kind or directions concerning the possibility of injury resulting from the use of the products listed in Interrogatory No. 13(b)?

ANSWER: See attached Exhibit 4.

34. If so, please state:

a. The wording of each such warning.

ANSWER: (a-d) See attached Exhibit 4.

b. A description of each such printed material.

ANSWER:

c. The method used to distribute the warning to persons who are likely to use the poducts.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/21

d. The date each such warning was issued.

ANSWER:

e. The name, address, and job classificaton of each person who presently has possession of the above described documents.

ANSWER: This defendant's Legal Department.

35. Did Defendant, Defendant's predecessor, or any of Defendant's subsidiary companies receive notice prior to 1968, that any person was claiming injury as a result of using asbestos products manufactured, and/or sold by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies?

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

36. If so, please state:

a. The name and address of each claimant.

ANSWER: N/A

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/22

b. The date of notice of each claim.

ANSWER:

c. A description of the claim.

ANSWER:

d. The type of injuries allegedly sustained.

ANSWER:

e. The name and address of each attorney representing the individuals making such claims.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/23

f. The style and court number of each such claim.

ANSWER:

g. The resolution of each claim.

ANSWER:

37. Have Defendant's asbestos products or those of Defendant's predecessor or Defendant's subsidiaries been marketed and/or sold at any time by companies other than Defendant, Defendant's predecessor, or Defendant's subsidiaries?

ANSWER: See attached Exhibit 5.

38. If so, please list the name and address of each such company.

ANSWER: See this defendant's Response to Interrogatory No. 37.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/24

39. Does Defendant have, in its possession, any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers can be hazardous to the health of human beings?

ANSWER: United States Gypsum Company maintains two libraries, neither of which deals specifically with industrial hygiene, medicine, safety, or engineering. Induvidual employees of this defendant may maintain personal files on speicific subjects.
If the plaintiff will identify the articles, journals or periodicals in which it is interested, United States Gypsum Company will attempt to ascertain whether or not the publication is in its library.

40. If so, please state for each such publication:

a. The name of each such publication, document or written material.

ANSWER: See this defendant's Response to Interrogatory No. 39.

b. The date each such document, memoranda, or written material was published and the name of the publisher and author.

ANSWER:

c. The date each such document was received by Defendant, Defendant's predecessor or Defendant's subsidiary companies.

ANSWER:

d. The name, job title and address of each person who currently has possession of such documents.

ANSWER:

41. Has Defendant undertaken to investigate the occurrences alleged in Plaintiff's complaints?

ANSWER: Such determination has not yet been made. This defendant reserves the right to respond to this Interrogatory at a later date.

42. If so, please state:

a. The name, address and job title of the persons participating in each such investigation.

ANSWER: N/A

b. List each written record pertaining to such investigation and its location and custodian.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/26

c. Has Defendant obtained statements from any witnesses?

ANSWER:

d. If so, please list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER:

43. Please state whether or not the Defendant, Defendant's predecessor, or Defendant's subsidiary companies, from 1930 to the present, ever conducted any tests in the field (i.e., where the asbestos containing products of Defendant, Defendant's predecessor, or Defendant's subsidiary companies were being applied, removed or used) to determine the nature and extent of asbestos fiber exposure to workers, applicators or fellow employees working in the vicinity thereof.

ANSWER: Not to this defendant's best currnet knowledge, information and belief. See, however, this defendant's Response to Interrogatory No. 27.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/27

44. If so, please identify:

a. The date, place and nature of each and every test.

ANSWER: N/A

b. The particular asbestos containing insulation product to which each test applies.

ANSWER:

c. The result of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site.

ANSWER:

45. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 13(b) have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER: See attached Exhibit 1.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/28

46. Has sales material been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents for purposes of marketing or advertising the asbestos products listed in answer to Interrogatory No. 13(b)?

ANSWER: United States Gypsum Company 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 United States Gypsum Company's offices at 101 South Wacker Drive, Chicago, IL 60606, pursuant to a properly filed motion to produce.

47. If so, please state:

a. The name and address of each person or entity who prepared same.

ANSWER: See this defendant's Response to Interrogatory No. 46.

b. The name, address, and job title of each person who presently has possession of same.

ANSWER:

c. The date same was prepared.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/29

d. The media used to disseminate the sales material.

ANSWER:

48. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 13(b) should be used or maintained?

ANSWER: See this defendant's Response to Interrogatory No. 46.

49. If so, please state as follows:

a. The name, address, and job classification of each person who prepared same.

ANSWER: See this defendant's Response to Interrogatory No. 46.

b. The name, address, and job classification of each person who presently has possession of same.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/30

c. The dates and manner in which said material was distributed to purchasors of the products listed in answer to Interrogatory No. 13(b).

ANSWER:

50. Does Defendant contend that Plaintiff improperly used its products?

ANSWER: Such determination has not yet been made. This defendant reserves the right to supplement its response at a later date.

51. If so, please set out in detail in what respect said products were improperly used.

ANSWER: N/A

52. Please state whether or not Defendant, Defendant's predecessor, or Defendant's subsidiary companies ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health.

ANSWER: See attached Exhibit 6.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/31

53. If so, please state:

a. When Defendant, Defendant's predecessor, or Defendant's subsidiary companies first became aware of the hazardous potential of asbestos dust and asbestos fibers.

ANSWER: See attached Exhibit 6.

b. The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained.

ANSWER:

54. Please state when the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first acquired knowledge concerning the association between inhalation of asbestos fibers and the contraction of cancer including, but not limited to, mesothelioma and state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER:

See attached Exhibit 6

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/32

55. Please state when the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first acquired knowledge concerning the association between the inhalation of asbestos fibers and the contraction of a lung disease known as asbestosis and state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: See attached Exhibit 6.

56. Please identify all physicians (including their names and addresses) who were employed, retained or otherwise engaged by Defendant, Defendant's predecessor, or Defendant's subsidiary companies from 1930 to date for research, investigation or study concerning asbestos or asbestos-related disease.

ANSWER: This defendant has not "employed, retained or otherwise engaged " physicians "for research, investigation or study concerning asbestos or asbestos-related disease".

57. Please identify (including their names and addresses) all persons employed by the Defendant from 1930 to the present time who functioned as industrial hygienists and please state, as to each individual identified, the facility or office to which they were assigned and a complete and precise summary of their duties and resposibilities.

ANSWER: This defendant employed F. Tremmel, 101 South Wacker Drive, Chicago, IL 60606, as an industrial hygienist in 1986. Proir to that time, this defendant did not employ an industrial hygienist.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/33

58. Please list each individual who acted in a medical advisory capacity to Defendant, Defendant's predecessor, or Defendant's subsidiary companies since 1930 and the current address and job title of each such individual.

ANSWER: This defendant first employed a Medical Director in 1939. W. Highstone, M.D. 1939-1974. C.A. Hedblom, M.D. 101 South Wacker Drive, Chicago, IL 60606 1974-present.
In addition,United States Gypsum Company retained or consulted "outside doctors" who provided services to its employees. See attached Exhibit 7.

59. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time, any recommendations and/or suggestions to the Defendant, Defendant's predecessor, or Defendant's subsidiary companies pertaining to the risk or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom and to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: Not to this defendant's best current knowledge, information and belief. Recommendations or suggestions may have been made to individual employees.

60. Please state the scientific or medical periodicals to which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies, their medical departments, industrial hygiene divisions or consulting physicians subscribed during the period between 1930 and the present time.

ANSWER: See this defendant's Response to Interrogatory No. 39.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/34

61. Does Defendant, Defendant's predecessor, or Defendant's subsidiary companies maintian a library dealing with industrial hygiene, medicine, safety and engineering? If so, state:

a. The date each such library was established.

ANSWER: See this defendant's Response to Interrogatory No. 39.

b. The location of each library.

ANSWER: 101 South Wacker Drive, Chicago, IL 60606. This defendant's Research Department also maintains a library.

c. The name(s) of the librarian(s) since 1930.

ANSWER: Librarians at 101 South Wacker Drive. Chicago, IL 60606

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

Research Librarian:

M. Ehrmann	1961-present

Investigation is continuing

d. All journals subscribed to by Defendant, Defendants predecessor, or Defendant's subsidiary companies concerning asbestos, industrial hygiene, medicine, safety, and/or engineering.

ANSWER: (d-e) See this defendant's Response to Interrogatory No. 39.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/35

e. All books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER:

62. Please state whether the Defendant, Defendant's predecessors, or Defendant's subsidiary companies at any time have been members of any "trade organizatons" or "trade association" composed of other manufacturers, miners and/or sellers of asbestos products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: See attached Exhibit 8.

63. With respect to each trade organization or association listed in answer to Interrogatory No. 62, please state whether the minutes of the group's meetings and any correspondence between the members of such groups, concerning the hazards of asbestos exposure are available and state the names and addresses of the persons presently in possession of such minutes and correspondence.

ANSWER: See this defendant's Response to Interrogatory No. 62.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/36

64. Please identify by name the technical and trade association periodicals to which the Defendant, Defendant's predecessors, or Defendant's subsidiary companies subscribed from 1930 to present date and state whether Defendant, Defendant's predecessor or Defendant's subsidiary companies had knowledge of any articles being printed or withheld from printing, in said periodicals pertaining to the hazardous potential of asbestos.

ANSWER: Objection. This Interrogatory is overbroad and unduly burdensome. Without waiving this objection, if plaintiff will identify the technical and trade association periodicals in which it is interested, this defendant will attempt to ascertain whether or not it subscribed to such periodicals.
This defendant, to its best current knowledge, information and belief, had no "knowledge of any articles being printed or withheld from printing in said periodicals pertaining to the hazardous potential of asbestos."

65. If so, please state the following:

a. The title of each such article.

ANSWER:
N/A

b. The periodical in which each such article was published.

ANSWER:

c. The date each such article was published.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/37

d. A detailed explanation of the reason for withholding any such article for printing.

ANSWER:

66. Please state whether Defendant, Defendant's predecessor or Defendant's subsidiary companies, or the agents or employees of such entities, sponsored or attended since 1930 any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meetings and the name and address of any speakers or participants.

ANSWER: This defendant is aware that some of its employees attended a seminar led by American Mutual Insurance Company, This defendant's carrier at the time, in Wakefield, MA. in 1968. This defendant believes that the subject of asbestos and certain hazards incident to the use of abestos were discussed. Asbestos was not the focus of said seminar which dealt generally with nuisance dust. This defendant has located no reports or documents at this meeting.

67. Does Defendant contend that asbestos products can be manufactured so as to eliminate all potential health hazards to workers installing same?

ANSWER: Objection. Information sought by this Interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, this defendant believes that no product "can be manufactured so as to eliminate all potential health hazards to workers installing same."

68. If so, please explain.

ANSWER: N/A

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/38

69. Please state if and when the Defendant, Defendant's predecessors, and/or Defendant's subsidiary companies first determined that any other product could be used in place of asbestos for its' products which presently or in the past contained asbestos and, if so, identify the chemical composition of the product, the date when the above-referenced product was first marketed and the name or trade name under which the product was marketed.

ANSWER: This defendant has found no substance which it considers an equivalent substitute for asbestos.

70. Would any respirators or other breathing devices prevent inhalation of the asbestos dust and fibers contained in the products listed in answer to Interrogatory No. 13(b)? If so, state:

a. When the respirator was sold.

ANSWER: Objection. This Interrogatory calls for a medical conclusion which no employee of this defendant is qualified to offer.

b. A detailed description of such respirator or other breathing devices, including name of manufacturer and model number.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/39

c. The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers.

ANSWER:

d. Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author, and number.

ANSWER:

71. Please describe in detail the type of packages in which the asbestos products listed in answer to Interrogatory No. 13(b) were sold, listing the date each type of package was used, a physical description thereof, and a description of any printed material or trademarks that appeared thereon.

ANSWER: See attached Exhibit 9.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/40

72. Has Defendant, Defendant's predecessor and/or Defendant's subsidiary companies, at any time, entered into a "re-branding" agreement with any other company, either as a buyer or a seller concerning asbestos containing materials?

ANSWER: In the 1950's - 1970's, United States Gypsum Company purchased asbestos cement board from National Gypsum Company, which was reshipped as received. In addition, United States Gypsum Company drilled this material and rebranded it for sale and use as asbestos lay-in panels in the late 1950's. United States Gypsum Company also purchased pipe covering from a company believed to be named Baldwin Ehret-Hill in the 1930's.
Further, see attached Exhibit 5.

73. If your answer to Interrogatory No. 72 is affirmative, please state, as to each such agreement:

a. The name of the company manufacturing the asbestos products under such agreement.

ANSWER: See this defendant's Response to Interrogatory No. 72.

b. The trade name affixed to such products.

ANSWER:

c. The periods of time covered by each such agreement.

ANSWER:

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/41

d. The volume (in dollar amounts) of each such transaction.

ANSWER:

e. The purchaser of such products.

ANSWER:

74. Does Defendant currently have possesion of any writtings or contracts concerning such rebranding agreements?

ANSWER: Not to this defendant's best currnet knowledge, information and belief. Discovery continues.

75. If the answer to Interrogatory No. 74 is affirmative, please state:

a. The name, address and job description of each person having custody of such documents.

ANSWER: See this defendant's Response to Interrogatory No. 74.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/42

b. A breif description of each such document.

ANSWER:

c. Please produce copies of said documents.

ANSWER:

76. Did any person, prior to 1968, file a claim against any Workman's Compensation carrier covering Defendant, Defendant's predecessor or any of Defendant's subsidiaries alleging that he or she contracted a disease as a result of exposure to asbestos?

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

77. If so, please provide the following information:

a. A list of each such claim by claimant's name, date filed and jurisdiction involved.

ANSWER: N/A

b. A brief summary of the disposition of each such claim.

ANSWER:

78. Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevent to this case.

ANSWER: Objection. Such information, if it exists, would have been developed through discovery and would therefore be as equally available to plaintiff as to this defendant.

79. Please identify each document Defendant will offer in evidence upon the trial of this case to support the defenses contained in Defendant's Answer.

ANSWER: Such determination has not yet been made. Discovery continues.

80. Does Defendant admit that service of process was properly had on Defendant in this case?

ANSWER: This defendant does not contest service of process.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/44

81. If the answer to Interrogatory No. 80 is negative, please explain the reasons for such answer.

ANSWER: N/A

82. Does Defendant have policies of insurance that might cover claims that have been made by Plaintiff herein?

ANSWER: See attached Exhibit 10.

83. If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

ANSWER: See attached Exhibit 10.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/45

EXHIBIT 1

Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
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
				Philadelphia, PA
		1949	1950	Jacksonville, FL
				Norfolk, VA
		1949	1972	Philadelphia, PA
Red Top Cover Coat	Finish Plaster	1942	1954	Southard, OK
Red Top Patching Plaster	Finish Plaster	1929	1947	Gypsum, OH
				New Brighton, NY
		1942	1946	Nephi, UT
		1942	1951	Milwaukee, WI
		1944	1947	South Gate, CA

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
Published by AsbestosClaims.Law
ACL Doc 23890 · Page 46 of 78
asbestosclaims.law/library/23890/46

Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
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

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 47 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/47

Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
Red Top Structo-Lite Gypsum Plaster for Machine Application (cont.)				Southard, OK Sweetwater, TX
		1955	1959	Milwaukee, WI
		1957	1962	Shoals, IN
		1958	1962	Plaster City, CA
		1963	1972	Fort Dodge, IA
		1971	1972	Detroit, MI
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, NV
Bondcrete	Basecoat	1940	1943	Midland, CA

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/48

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

° 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, NV
FIRECODE D	Fireproofing Plaster	1959	1964	New Brighton, NY East Chicago, IN Empire, NV
****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

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 49 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/49

Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
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

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 50 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/50

Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
Other Products (By generic group)				
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.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/51

**** 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.

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 52 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/52

EXHIBIT 2

PERCENTAGE OF ASBESTOS (VOLUME)

Acoustical Plasters

Product	DATE	PERCENT ASBESTOS
SABINITE "TF"	No Change	4.9%
SABINITE "B"	04/18/33	2.0%
	11/03/33	4.0%
SABINITE 38 (HYDRAULIC)	11/10/30	2.4%
	04/18/32	3.0%
	01/13/37	2.0%
	07/12/39	3.0%
SABINITE ACOUSTICAL PLASTER	05/23/30	.98%
	01/01/31	2.5%
	06/29/32	2.0%
	05/03/40	4.0%
SABINITE "M" and SABINITE SPECIAL WHITE	10/18/40	4.0%
	01/23/48	6.3%
SABINITE "F"	02/27/44	4.0%
	07/28/50	3.0%
	07/28/50	4.0%
	09/18/52	3.0%
SABINITE "A" or SABINITE HYDROCAL	04/04/31	4.0%
	04/18/33	2.0%
	11/03/33	4.0%
HI-LITE ACOUSTICAL PLASTER	06/09/53	6.2%
	03/31/55	6.3%
AUDICOTE SPECIAL WHITE	09/15/55	8.25%
	08/24/56	7.62%
	10/31/56	7.60%
	12/14/56	8.0%
	03/27/57	7.7%
	12/02/57	6.95%
	12/02/57	22.50%

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 53 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/53

PRODUCT	DATE	PERCENT ASBESTOS
AUDICOTE SPECIAL WHITE (cont'd.)	03/10/58	7.1%
	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%
	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	9.7%
* SPRAYDON STANDARD A	No Change	29.7%
* SPRAYDON STANDARD G	No Change	7.6%
* SPRAYDON POWERCOTE	No Change	30.0%

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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/54

Texture Products

PRODUCT	DATE	PERCENT ASBESTOS
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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/55

PRODUCT	DATE	PERCENT ASBESTOS
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
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

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 56 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/56

PRODUCT	DATE	PERCENT ASBESTOS
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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/57

PRODUCT	DATE	PERCENT ASBESTOS
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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/58

PRODUCT	DATE	PERCENT ASBESTOS
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 NC-4	1967 1968	8.0 6.0
IMPERIAL QT	No Change	2.0
USG Spray Texture Finish	1965	.5
USG Spray Texute 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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/59

PRODUCT	DATE	PERCENT ASBESTOS
USG Spray Texture R	No Change	1.5
USG Concrete Ceiling Texture	No Change	6.0
TEXTONE Texture Finish	1944	2.5-4.5
	1967	3.5-5.5
	1972	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%

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.

* Not all formulations contained asbestos.

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 60 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/60

EXHIBIT 3

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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/61

EXHIBIT 4

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)

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/62

Asbestos Products Manufactured by United States Gypsum Company for Other Asbestos Producers

This defendant is presently aware that it manufactured an asbestos-containing product for National Gypsum Company, for Brickstone Company and for Sprayon Research Corporation. Those products and their production years are as follows:

Colored Exterior Stucco

(National Gypsum Company, mid-1940's through 1970's)

Exterior Finish Stucco

(Brickstone Company, mid-1960's to late 1960's)

SprayDon Fireproofing * (Sprayon Research Corporation 1966-1971)

* Sold and distributed by Sprayon Research Corporation and Metropolitan Spray Inc., and manufactured according to Sprayon specifications by this defendant.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/63

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.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/64

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.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/65

EXHIBIT 7

Medical Personnel

Retained/Consulted

Oakfield, New York

R. C. Warn, M.D.

J. Diasio, M.D.

Chamblee, Georgia

H. M. Schreeder, M.D.

W. C. McGraw, M.D.

Greenville, Mississippi

J. B. Hirsch, Sr., M.D.

O. Beck, M.D.

J. B. Hirsch, Jr., M.D.

Corsiciana, Texas

A. L. Grizzafi, M.D.

Dallas, Texas

Launey Medical & Surgical Clinic

D. G. Launey, M.D.

S. L. Gilbert, M.D.

F. C. Atkinson, M.D.

R. F. Duchouquette, M.D.

W. D. Stevenson, M.D.

D. H. Waddell, M.D.

R. R. Henry, M.D.

Z. L. Dameron, M.D.

W. D. Lee, M.D.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/66

Jacksonville, Florida

J. H. Mitchell, M.D.

J. L. Mitchell, M. D.

Plasterco, Virginia

J. A. Sawyers, M.D.

P. W. Cowherd, M.D.

Sweetwater, Texas

C. A. Rosebrough, M.D.

A. H. Fortner, M.D.

S. A. Loeb, M.D.

J. K. Richardson, M.D.

T. D. Young, M.D.

F. Hood, M.D.

R. L. Price, M.D.

Detroit, Michigan

R. L. St. Louis, M.D.

K. Hergt, M.D.

East Chicago, Indiana

R. J. Liehr, M.D.

F. F. Boys, M.D.

F. A. Benchik, M.D.

G. A. Thegze, M.D.

J. Demkowicz, R.N.

Fort Dodge, Iowa

Fort Dodge Medical Center

T. J. Michelfelder, M.D.

C. L. Dagle, M.D.

M. E. Kraushaar, M.D.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/67

Fort Dodge, Iowa et.

J. J. Landhuis, M.D.

G. L. LeValley, M.D.

J. W. Rathke, M.D.

R. H. Brandt, M.D.

J. R. Kersten, M.D.

W. C. Robb, M.D.

H. H. Kersten, M.D.

R. E. Woodard, M.D.

Gypsum, Ohio

C. J. Yeisley, M.D.

A. J. Miessner, M.D.

P. Hughes, M.D.

K. Ritter, M.D.

K. Akins, M.D.

M. Jennings, R.N.

Shoals, Indiana

E. B. Lett, M.D.

R. E. Chattin, M.D.

Empire, Nevada

Sparks Medical Clinic

J. M. Watson, M.D.

M. Raymond, M.D.

J. C. Kelly, M.D.

F. C. Stokes, M.D.

Torrance, California

P. Casey, M.D.

J. Anable, M.D.

Dr. Cook

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/68

South Gate, Califc ıia

H. Caesar, M.D.

Family Medical Clinic

(Various physicians. Names unavailable)

Firestone Medical Group

(Various physicians. Names unavailable)

Tacoma, Washington

B. Archer, M.D.

Walworth, Wisconsin

D. R. Hansen, M.D.

I. J. Bruhn, M.D.

J. A. Carroll, M.D.

A. C. Sapida, M.D.

Boston, Massachusetts

V. Rubin, M.D.

E. Staffier, M.D.

A. C. Leavitt, M.D.

Sullivan Square

American Mutual Insurance Clinic

Massachusetts General Hospital

The plants at New Brighton, New York; Jersey City, New Jersey; St. Paul, Minnesota; Midway, Illinois; South Plainfield, New Jersey; and Midland, California are no longer in operation. Identifiable information on medical personnel is not maintained for plants no longer in operation by United States Gypsum Company.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/69

The following represents this defendant's best current information:

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY
Gypsum Association	1930–present	Asbestos discussed at all of the following: Membership meetings: 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 Safety Committee Meetings: 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 Manufacturing & Mining Committee: 4/3/73 – W. W. Holloway, H. D. Gobrecht	Minutes of meetings, but these documents are not 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.

United States Gypsum's Answers to Plaintiffs' Interrogatories in Dikun v. Armstrong World Industries (1986)
ACL Doc 23890 · Page 70 of 78
Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/70

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY
Gypsum Association (cont.)		Manufacturing & Mining Committee: 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 Technical Committee: 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 Board of Directors: 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	Industrial Hygiene Digest Monthly Abstracts – 1/74 – 12/81 (JDC's) Annual Business Reports (JDC's)

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/71

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY
		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 TIMA) Thermal Insulation Manufacturers Association	1973–1974	unknown	Minutes produced in other litigation (Wm. Simpson deposition) (1958–?)
	1974–present	none	Some mass correspondence letters regarding committees J. D. Cornell was on – health and safety, public information, medical and scientific dated 1978 to the present.
National Insulation Contractors Association (Associate Member)	unknown (perhaps 1972–present?)	none	NICA by Laws dated 1975; NICA's 1981 Annual Report.
National Safety Council	1914–present	none	Transactions from 1912–1978 records of all presentations and papers produced at Phillip E. Schmidt, deposition and document production April 17, 1984, in Neil Woods.
National Mineral Wool Association	1943?–1957 mid–1960's mid–1970's	none	none

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/72

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE T(UNITED STATES GYPSUM COMPANY
*Contracting Plaster and Lathers International (Associate Member)	1960–1969	none	Some documents in M. V. Cook's and J. Edwards' files.
*International Association Wall and Ceiling Contractors (Associate Member)	1970–1976	none	Some documents in M. V. Cook's and J. Edwards' files.
*Gypsum Drywall Contractors International (Associate Member)	1960–1976 unknown	none	Some documents in M. V. Cook's and J. Edwards' files.
*Association of Wall and Ceiling Contractors Industries International – Gypsum Drywall Contractors International (Associate Member)	1976–1979	none	Some documents in M. V. Cook's and J. Edwards' files.
*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

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/73

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE TO UNITED STATES GYPSUM COMPANY
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 from 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	

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/74

ORGANIZATION	DATES OF MEMBERSHIP	HEALTH HAZARDS OF ASBESTOS DISCUSSED AT MEETINGS ATTENDED BY UNITED STATES GYPSUM COMPANY PERSONNEL	DOCUMENTS AVAILABLE T UNITED STATES GYPSUM COMPANY
Asbestos Textile Institute	never a member	none	
SOEH/IOEH	never a member	"Occupational Exposures to Fibrous and Particulate Dust and Their Extentions into the Environment" 12/5/77 – 12/7/77 J. D. Cornell (others?)	none
Safe Building Alliance	10/84 – present	See below **	See below **

*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

**Objection. Information sought is irrelevant and will lead to the discovery of no admissible evidence.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/75

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.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/76

This defendant is primarily insured by the following:

Dates of Coverage	Carrier	Policy Number
prior to 4/1/42	unknown	unknown
4/1/42 - 4/1/43	The Hartford	unknown
4/1/43 - 4/10/49	Liberty Mutual	unknown
4/10/49 - 3/10/52	Lloyd's of London	unknown
3/10/52 - 3/10/55	Lloyd's of London	C36693
3/10/55 - 4/1/58	Lloyd's of London	642295
4/1/58 - 4/1/61	Lloyd's of London	RS907609
4/1/61 - 4/1/62	American Motorists	1 YM 1147000
4/1/62 - 2/1/63	American Motorists	unknown
2/1/63 - 2/1/64	American Mutual	BLPL 952989-12-0D
2/1/64 - 2/1/65	American Mutual	BLPL 952989-12-1D
2/1/65 - 2/1/66	American Mutual	BLPL 952989-12-2D
2/1/66 - 2/1/67	American Mutual	BLPL 952989-12-3D
2/1/67 - 2/1/68	American Mutual	BLPL 952989-12-4D
2/1/68 - 2/1/69	American Mutual	BLPL 952989-12-5D
2/1/69 - 2/1/70	American Mutual	BLPL 952989-12-6D
2/1/70 - 4/1/71	American Mutual	BLPL 952989-12-7D
4/1/71 - 2/1/72	Kemper	1ZM127-724
2/1/72 - 2/1/73	Kemper	2ZM127-724
2/1/73 - 2/1/74	Kemper	3ZM127-724
2/1/74 - 2/1/75	Kemper	4ZM127-724
2/1/75 - 7/1/75	Kemper	5ZM127-724
7/1/75 - 7/30/79	The Travelers	TR-NSL-135T060-1-75
8/1/79 - 7/31/82	CNA	005 30 96 37
8/1/82 - present	Primary self insurance rentention administered by Gallagher Bassett Insurance Service	

The amount of coverage, if applicable, is sufficient to cover the instant claims. General questions concerning apportionment of claims and application of deductibles are presently before the courts and unresolved.

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/77

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 September 4, 1986 in Chicago, Illinois.

C. L. Murphy

Subscribe and sworn to before me
this 4th day of September, 1986.

Lisa A. Distel
Notary Public

Published by AsbestosClaims.Law
asbestosclaims.law/library/23890/78