FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JUN 20 1990

Jack C. Silver, Clerk
U.S. DISTRICT COURT

IN RE:) No. M-1417
)
ASBESTOS PERSONAL INJURY CASES) ASB-134

UNITED STATES GYPSUM COMPANY'S
ANSWERS TO PLAINTIFFS' MASTER INTERROGATORIES

COMES NOW the Defendant, Unites States Gypsum Company, and for its answers and objections to the Master Interrogatories presented to it by Plaintiffs represented by Mark Iola, states as follows:

GENERAL OBJECTIONS:

1. This Defendant objects to these Interrogatories on the grounds that they call for information which is protected by the attorney-client privilege and work product doctrine.

2. This Defendant objects to the Interrogatories to the extent that they seek to require Defendant to gather and summarize information contained in voluminous papers that are already a matter of public record.

3. This Defendant objects to the Interrogatories to the extent that they seek to require this Defendant to provide information which is equally available to the Plaintiff as to this Defendant.

4. This Defendant objects to Plaintiffs Interrogatories to the extent that they improperly call for a legal, medical or a scientific opinion or conclusion which Defendant is not qualified to render.



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5. This Defendant objects to the Interrogatories to the extent that they are vague, ambiguous, overly broad and unduly burdensome.

Without waiver of any of the foregoing objections, which are incorporated by reference in the following responses, Defendant answers Plaintiffs' Interrogatories as follows:

INTERROGATORY NO. 1: State the name, address, job title, length of time employed by Defendant, and a year-by-year listing of all other positions, titles, or jobs held with Defendant of each person who has supplied information used in answering these interrogatories.

ANSWER NO. 1: F. M. Poremski, Manager, Financial and Accounting Services, United States Gypsum Company, has reviewed these Responses for the purpose of satisfying the verification requirements. These Responses have been prepared based on the continual review of documents located in this defendant's files and information obtained from discussions with this defendant's employees over a period of many years. It is not possible to reconstruct each step taken to gather this information or to verify all documents which might possibly pertain to the matters at issue that have been located or examined in connection with these Responses. Nor is it possible to specifically identify by name each person who has participated in the preparation of these Responses or to identify each document which may have provided information used in preparing these Responses.

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INTERROGATORY NO. 2: State whether or not you are a corporation. If so, state your correct name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Oklahoma.

ANSWER NO. 2: Yes. United States Gypsum Company. Delaware. 101 South Wacker Drive, Chicago, Illinois 60606. Authorized Agent: The Corporation Company, 735 First National Building, Oklahoma City, Oklahoma 73102. Yes. This defendant has held a Certificate of Authority to do business in the State of Oklahoma since 1920.

INTERROGATORY NO. 3: Has Defendant or any of its subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers?

ANSWER NO. 3: This defendant has never mined asbestos. This defendant has no subsidiary companies.

INTERROGATORY NO. 4: Has Defendant or any of its subsidiary companies at any time engaged in the manufacture and sale of products containing asbestos fibers?

ANSWER NO. 4: Yes.

INTERROGATORY NO. 5: Has Defendant or any of its subsidiary companies at any time engaged in the marketing and sale of products containing asbestos fibers?

ANSWER NO. 5: Yes.

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INTERROGATORY NO. 6: If the answer to one or more of the last three interrogatories is in the affirmative, state as to each affirmative answer the following:

A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.

B. The names of the companies mining, manufacturing, marketing, and/or selling each of those products.

C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the products and the percentage of asbestos in each product.

F. The date each of the products was removed from the market and the reason or reasons therefor.

G. A description of the physical appearance of each of the named products.

H. A detailed description of the intended uses of the named products.

ANSWER NO. 6: (a-d) Objection. This defendant objects to this Interrogatory as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. There is no allegation concerning which particular product manufactured by U. S. Gypsum Company may have contributed to the plaintiff's alleged injury. Without waiving its objection, see attached Exhibit No. 1 for a listing of all products containing asbestos as part of their formulations which were manufactured, marketed and/or sold by United States Gypsum Company, except as otherwise noted therein.

(e) Objection. This defendant objects to the term "a description of the physical (chemical composition) of each of the

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named products" on the ground of confidential trade secret. Without waiving this objection, chrysotile was the "type of asbestos" used in virtually all U. S. Gypsum Company products that contained asbestos. U. S. Gypsum now understands that amosite asbestos may have been used as a component ingredient in rigid block insulation for short periods of time. Further, see attached Exhibit No. 2.

(f) See attached Exhibit No. 3.

(g) See attached Exhibit No. 4.

(h) See attached Exhibit No. 1.

INTERROGATORY NO. 7: Does Defendant or any of its subsidiary companies claim that any patent would cover any product listed in Interrogatory No. 6? If so, for each product, please state:

A. The number of each patent and the date it was issued.

B. The number and date filed for each pending patent application.

ANSWER NO. 7: Objection. This defendant objects to this Interrogatory as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, this defendant is aware that it held a patent for at least one of the above-stated products, that product being K-FAC. As related to the other specified products, to the extent such information is available to United States Gypsum Company and would not require it to undertake an unreasonable investigation at an unreasonable cost, it is contained in documents which United States Gypsum Company will provide to Plaintiffs at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois 60606.

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INTERROGATORY NO. 8: Have any of the products listed in Interrogatory No. 6 been altered in chemical composition since first being marketed? If so, state:

A. The trade name of each of those products.
B. The date each of the named products was altered.
C. The nature of the alteration.
D. The reason for the alteration.
E. The names of all persons involved in the decision to alter the product(s).

ANSWER NO. 8: Objection. This defendant objects to this Interrogatory as being overbroad, burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. There may have been many minor changes over the years due to raw material availability and differing geographical market conditions.

INTERROGATORY NO. 9: State the name, address, and job title of each person who participated in the design and preparation of the manufacturing specifications for each product listed in Interrogatory No. 6.

ANSWER NO. 9: Objection. This Interrogatory is overbroad, irrelevant, unduly burdensome and will not lead to the discovery of admissible evidence. This defendant has employed thousands of employees since its inception and, thus, it would be impossible to determine who would have the knowledge or information that plaintiff is seeking.

INTERROGATORY NO. 10: Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

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A. A description of each such document.

B. The name, address and job title of each person who currently has possession of each document, and where the documents are currently located.

ANSWER NO. 10: Objection. This defendant objects to this Interrogatory as being overbroad, burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, the information sought in this Interrogatory may be derived from operating bulletins which are regularly maintained business records of United States Gypsum Company. Operating Bulletins for products which plaintiff can establish are relevant to this litigation will be made available to plaintiff for his inspection and review at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois, 60606, pursuant to a request to produce.

INTERROGATORY NO. 11: Before releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards involved in the use of materials contained in those products? If the answer is affirmative, state:

A. The names of the products tested.

B. The name, address, and job title of each person conducting the tests.

C. The results of the tests.

D. Whether, as a result of the tests, any products were removed from the market.

E. The names of all products removed from the market as a result of the tests.

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ANSWER NO. 11: Objection. This Interrogatory is overbroad, burdensome, irrelevant and not reasonably reasonably calculated to lead to the discovery of admissible evidence, and is not limited to testing with respect to asbestos only, the focus of this litigation. Without waiving this objection, U. S. Gypsum has conducted a number of studies which relate to its asbestos-containing products and which concern various performance parameters of those products.

INTERROGATORY NO. 12: Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the named products now exist? If so, state:

A. A description of each such document.

B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER NO. 12: Objection. This Interrogatory is overbroad and burdensome and is not limited to testing with respect to asbestos only, the focus of this litigation. Without waiving this objection, U. S. Gypsum has conducted a number of studies which relate to its asbestos-containing products and which concern various performance parameters of those products.

INTERROGATORY NO. 13: Did Defendant or any of its subsidiary companies make any design changes as a result of those tests? If the answer is affirmative, state:

A. The trade names of the products changed.

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B. The nature of the changes made.

C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change.

ANSWER NO. 13: Not applicable.

INTERROGATORY NO. 14: After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards involved in the use of materials contained in those products? If the answer is affirmative, state:

A. The names of the products tested.

B. The name, address, and job title of each person who conducted those tests.

C. The results of those tests.

ANSWER NO. 14: Objection. This Interrogatory is overbroad and burdensome and is not limited to testing with respect to asbestos only, the focus of this litigation. Without waiving this objection, U. S. Gypsum has conducted a number of studies which relate to its asbestos-containing products and which concern various performance parameters of those products. U. S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds.

INTERROGATORY NO. 15: Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

A. The name of each product.

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B. A description of each document.

C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER NO. 15: See this defendant's response to Interrogatory No. 14.

INTERROGATORY NO. 16: Did Defendant or any of its subsidiary companies make any design changes as a result of those tests? If the answer is affirmative, state:

A. The names of the products changed.

B. The name, address, and job title of each person responsible for having made a change.

C. The nature of the hazard or defect which resulted in such change.

ANSWER NO. 16: Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 17: Has Defendant or any of its subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, or other written material of any kind or character containing any warnings concerning the possibility of injury resulting from the use of the products listed in Interrogatory No. 6? If so, state:

A. The names of the relevant products.

B. The wording of each warning.

C. A description of the other printed material.

D. The method used to distribute the warning to persons likely to use the product.

E. The date each warning was issued.

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F. The name, address, and job title of each person responsible for having issued the warning.

G. The current location of any remaining literature and the custodian thereof.

H. The form in which such literature can be accessed, i.e., the manner in which such literature is indexed.

I. Whether you will permit Plaintiff access to the literature for discovery purposes outside a formal discovery request.

ANSWER NO. 17: Objection. This Interrogatory is overbroad, burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, U. S. Gypsum maintains no central repository for the accumulation of the requested information in the ordinary course of business. Documents that have already been identified and gathered to respond to discovery requests in other litigation and that relate to products which plaintiff can establish are relevant to this litigation, will be made available for inspection at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois, pursuant to a request to produce.

INTERROGATORY NO. 18: Have you received notice that any other person is claiming or has claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its subsidiaries, either before or after the filing of this action? If so, state:

A. The name and address of each claimant.

B. The date of notice of each claim.

C. A description of the claim.

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D. The type of injuries allegedly sustained.

E. The name and address of each attorney who represents each individual making a claim.

F. The style and court number of each claim currently pending.

G. The disposition of each claim that has been settled or taken to judgment.

ANSWER NO. 18: Objection. This Interrogatory is overbroad, unduly burdensome, irrelevant, immaterial and will lead to the discovery of no admissible evidence. Without waiving this objection, this defendant will make available to plaintiff for his inspection and review, copies of asbestos-related personal injury complaints filed against U. S. Gypsum Company. Said documents will be made available to plaintiff at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois, 60606, pursuant to a request to produce.

INTERROGATORY NO. 19: Are or were your asbestos products marketed and sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies.

ANSWER NO. 19: U. S. Gypsum manufactured colored exterior stucco for National Gypsum Company from the 1940's to the 1970's. This was resold under National Gypsum's Gold Bond label. U. S. Gypsum possesses documents which indicate that it was authorized to manufacture exterior finish stucco for the following companies who sold it under their company label: National Brickstone, early 1960's; Brickstone International, early 1960's to early 1970's; Temple Brick Corporation, mid-1960's.

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

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

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

INTERROGATORY NO. 20: Did you or any of your predecessors, successors, or subsidiaries have any distributors of asbestos products in the State of Oklahoma? If so, state:

A. The name and address of each such distributor.

B. The years in which such company or person distributed your products.

C. What products were distributed and in what years.

ANSWER NO. 20: Objection. U. S. Gypsum never manufactured asbestos products, but did manufacture products that contained small amounts of asbestos. Without waiving its objection, U. S. Gypsum does not possess any records maintained in the normal course of business which identify who the ultimate user of the product was or where it was installed. With that limitation, U. S. Gypsum responds as follows: Prior to 1966, U. S. Gypsum sold its construction products, some of which may have contained small amounts of asbestos, exclusively through independent

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dealers. Beginning in about 1966, U. S. Gypsum sold its construction products either directly to independent contractors, independent distributors or, as had previously been the custom, through independent dealers.

This defendant has no sales records for the years prior to 1965, other than records of gross sales of individual products by plant. Sales records thereafter are contained in computer printouts. Records of products which the plaintiff can establish were relevant to the subject matter of this lawsuit will be made available for inspection at a mutually convenient time at 101 South Wacker Drive, Chicago, Illinois, 60606, pursuant to a request to produce.

INTERROGATORY NO. 21: List each individual who has acted in a medical advisory capacity to your company in the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address and job title of each of those individuals.

ANSWER NO. 21: U. S. Gypsum's Chief Medical Officers:

C. A. Hedblom, M.D., 101 South Wacker Drive, Chicago, Illinois, 1974 to present.

W. Highstone, M.D., 1939 to 1974 (deceased).

In addition, U. S. Gypsum retained or consulted "outside doctors" who provided services to its employees. See attached Exhibit No. 5.

This defendant employed F. Tremmel as an industrial hygienist on August 4, 1986. Prior to that time, this defendant did not employ a certified industrial hygienist.

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This defendant employed H. Lawton as an industrial hygienist on 8/17/87 and H. C. Brown as an industrial hygienist on 9/28/87.

INTERROGATORY NO. 22: Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

A. The name of each publication.

B. The date of publication and the names of the author and publisher.

C. The date received by Defendant, if known.

D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER NO. 22: See attached Exhibit No. 6.

INTERROGATORY NO. 23: Has Defendant or any of its subsidiary companies at any time been a member of any trade organization or association comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

A. The name and address of each such association or organization.

B. The dates during which Defendant or any of its subsidiaries were members.

C. The name and dates of any publications, minutes, or reports of any kind published, written, or disseminated by any of the named associations or organizations.

D. Whether any of those publications are still in your possession, and if so:

1. A description of the publications, including the date.

2. The current location of such publication.

3. The custodian of such publications.

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4. The method or manner in which such publications are maintained.

5. Whether you would be willing to produce such publications to Plaintiff outside a formal discovery request.

ANSWER NO. 23: See attached Exhibit No. 7.

INTERROGATORY NO. 24: Identify by name and location each plant in which the products listed in your answer to Interrogatory No. 6 were manufactured and/or assembled, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced.

ANSWER NO. 24: See attached Exhibit No. 1.

INTERROGATORY NO. 25: List the name and address of each business entity from whom you have received raw asbestos, the dates it was received, the amounts received, and to whom the raw asbestos was shipped.

ANSWER NO. 25: The following are known to have been approved suppliers of asbestos: Canadian Johns-Manville, Lake Asbestos of Quebec, Nicolet Industries, Carey Canadian, Asbestos Corporation, Atlast Asbestos, Union Carbide, Pacific Asbestos, Keasby and Mattison and Johnson Mines. Atlas Asbestos and Pacific Asbestos shipped only to California. U. S. Gypsum Company also purchased small amounts of asbestos from North American Asbestos for a short period of time. It is unknown which source of supply was used for each particular product, at which mines the raw asbestos was mined, and from which locations the raw asbestos was shipped.

INTERROGATORY NO. 26: Has your company ever purchased products containing asbestos from any other manufacturer for resale?

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If so, state from whom, what was purchased, dates of purchase, to whom resale was made, and under what name or label.

ANSWER NO. 26: In the 1950's-1970's, U. S. Gypsum purchased asbestos cement board from National Gypsum Company, which was re-shipped as received. In addition, U. S. Gypsum drilled this material and rebranded it for sale and use as asbestos lay-in panels in the late 1950's. U. S. Gypsum also purchased pipe covering from a company believed to be named Baldwin-Ehret-Hill in the 1930's.

INTERROGATORY NO. 27: Have sales materials been prepared by Defendant or any of its subsidiary companies or their agents for purposes of marketing or advertising asbestos products? If so, state:

A. The name, address, and job title of each person or entity who prepared it.

B. The name, address, and job title of each person who currently has possession of it and its present location.

C. The date the materials were prepared.

D. The media used to disseminate the sales materials.

ANSWER NO. 27: See this defendant's response to Interrogatory No. 17.

INTERROGATORY NO. 28: Have any written materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary companies or their agents indicating how asbestos products should be used and maintained? If so, state:

A. The name, address, and job title of each person who prepared it.

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B. The name, address, and job title of each person who currently has possession of it and its present location.

C. The dates of distribution and the manner in which the materials were distributed to purchasers of Defendant's products.

ANSWER NO. 28: All packaging for this defendant's asbestos-containing products included directions and instructions for use.

INTERROGATORY NO. 29: Does Defendant have insurance policies that might cover the claims made by Plaintiff in this case? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining, and the effective dates of each policy.

ANSWER NO. 29: See attached Exhibit No. 8.

INTERROGATORY NO. 30: Does Defendant expect to call expert witnesses at the trial of these cases? If so, state:

A. The name, address, and telephone number of each such expert.

B. The current employer and occupation of each such expert.

C. A summary of the testimony expected to be given by each such expert.

D. Any and all previous times that the expert has either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition.

ANSWER NO. 30: The identity of expert witnesses to be called at trial by this Defendant is not known at the present time. This Defendant reserves the right to supplement this response to designate expert witnesses as soon as this information becomes available.

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INTERROGATORY NO. 31: As to the disease asbestosis, state:

A. The date on which Defendant learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the disease.

C. Who within the company discovered the adverse consequences or effects.

D. What information was disseminated within Defendant's company regarding such adverse consequences or effects.

E. Whether such information is still maintained by Defendant.

F. Who is the custodian of such information.

ANSWER NO. 31: See attached Exhibit No. 6.

INTERROGATORY NO. 32: As to the disease lung cancer, state:

A. The date on which Defendant learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the disease.

C. Who within the company discovered the adverse consequences or effects.

D. What information was disseminated within Defendant's company regarding such adverse consequences or effects.

E. Whether such information is still maintained by Defendant.

F. Who is the custodian of such information.

ANSWER NO. 32: See attached Exhibit No. 6.

INTERROGATORY NO. 33: As to pleural disease, state:

A. The date on which Defendant learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the disease.

C. Who within the company discovered the adverse consequences or effects.

D. What information was disseminated within Defendant's company regarding such adverse consequences or effects.

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E. Whether such information is still maintained by Defendant.

F. Who is the custodian of such information.

ANSWER NO. 33: See attached Exhibit No. 6.

INTERROGATORY NO. 34: As to the disease mesothelioma, state:

A. The date on which Defendant learned such disease was caused by inhalation of asbestos fibers by humans.

B. How Defendant became aware of the disease.

C. Who within the company discovered the adverse consequences or effects.

D. What information was disseminated within Defendant's company regarding such adverse consequences or effects.

E. Whether such information is still maintained by Defendant.

F. Who is the custodian of such information.

ANSWER NO. 34: See attached Exhibit No. 6.

INTERROGATORY NO. 35: As to other cancers of the body, state:

A. The type of cancer and the date on which Defendant learned such disease was caused by inhalation of asbestos fibers by humans.

B. How and of what disease Defendant became aware.

C. Who within the company discovered the adverse consequences or effects.

D. What information was disseminated within Defendant's company regarding such adverse consequences or effects.

E. Whether such information is still maintained by Defendant.

F. Who is the custodian of such information.

ANSWER NO. 35: See attached Exhibit No. 6.

INTERROGATORY NO. 36: Does Defendant contend that asbestos products can be manufactured so as to eliminate all potential

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health hazards to persons working with them? If the answer is affirmative, explain in detail, and attach any studies or surveys that confirm same.

ANSWER NO. 36: Objection. U. S. Gypsum Company objects to this interrogatory on the grounds that it seeks information which is not relevant or likely to lead to the discovery of admissible evidence. U. S. Gypsum Company further objects to this interrogatory on the grounds that it is argumentative.

INTERROGATORY NO. 37: Describe in detail the types of packages which Defendant or any of its subsidiary companies used to sell asbestos material, listing the dates each type of package was used, a physical description of each type of package, a description of any printed material or trademarks that appeared thereon, and attached photographs of such products, if available.

ANSWER NO. 37: See attached Exhibit No. 9.

INTERROGATORY NO. 38: Has Defendant or any of its subsidiary companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos material? If so, state, as to each such agreement:

A. The name of the company manufacturing the asbestos products under the agreement.

B. The trade name affixed to those products.

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

D. The volume, in dollar amount, of the transaction.

E. The purchaser of the products.

ANSWER NO. 38: Objection. This Interrogatory is vague and ambiguous. This defendant does not understand the term "asbestos

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materials". Without waiving this objection, see this defendant's response to Interrogatory Nos. 19 and 26.

INTERROGATORY NO. 39: List the name and address of each company from which you purchased asbestos materials, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER NO. 39: Objection. This Interrogatory is vague and ambiguous. This defendant does not understand the term "asbestos materials". Without waiving this objection, see this defendant's response to Interrogatory No. 25.

INTERROGATORY NO. 40: Does Defendant or any of its subsidiaries currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 34? If the answer is affirmative, state:

A. The name, address, and job title of each person having custody of each of those documents and their current location.

B. A brief description of each such document, including the date and parties signatory.

ANSWER NO. 40: See this defendant's response to Interrogatory No. 38.

INTERROGATORY NO. 41: Prior to 1986, has any person filed a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she has contracted a disease from inhaling asbestos fibers? If so, provide:

A. A list of the claims, including each claimant's name, address and date each claim was filed, including the caption and jurisdiction of the claim.

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B. The disease alleged in each such claim.

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

D. The person having custody of the records pertaining to each such claim.

ANSWER NO. 41: Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 42: Does Defendant admit that it or any of its subsidiaries maintain minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter covered within these interrogatories. If so, for each such set of minutes, state:

A. The general subject matter discussed.

B. The dates of each such meeting.

C. Who was in attendance.

D. Where and by whom the minutes are maintained.

E. By whom the minutes were taken and put into final format.

F. Whether the minutes were abstracted and reports disseminated to other individuals and, if so, the names and job titles of those individuals.

ANSWER NO. 42: Non-privileged, non-confidential documents responsive to this Interrogatory will be made available to plaintiff for his inspection at a mutually convenient time through U. S. Gypsum's offices at 101 South Wacker Drive, Chicago, Illinois, 60606, pursuant to a request to produce.

INTERROGATORY NO. 43: Do you currently manufacture any products containing asbestos? If so, state:

A. As to each product, state whether such product was mined, manufactured, and/or marketed or sold.

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B. The names of the companies mining, manufacturing, marketing, and/or selling each of those products.

C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.

D. The date each of the named products was placed on the market.

E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.

F. The date each of the products was removed from the market and the reason or reasons therefor.

G. A description of the physical appearance of each product.

H. A detailed description of the intended uses of each of the named products.

ANSWER NO. 43: No. This defendant discontinued manufacturing products with asbestos as part of their formulations in 1976.

INTERROGATORY NO. 44: State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to asbestos products mined, manufactured, marketed or sold. If so, state:

A. The location of such documents.

B. The name and address of the custodian of the documents.

C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.

D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

E. Whether you will permit Plaintiff access to those documents for discovery purposes outside a formal discovery request.

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ANSWER NO. 44: Objection. This Interrogatory is vague and ambiguous in that it does not set forth whether it is seeking the described documents for products this defendant sold or for products sold by other entities. Without waiving this objection, see this defendant's response to Interrogatory No. 20.

INTERROGATORY NO. 45: Do you expect to call company representatives as witnesses at the trial of these cases? If so, list:

A. The name, address, and job title of each company representative to be called.

B. A summary of the testimony expected to be given by each such witness.

C. Any and all previous times that the witness has either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition.

ANSWER NO. 45: The identity of witnesses to be called at trial by this Defendant is not known at the present time. This Defendant reserves the right to supplement this response as soon as this information becomes available.

INTERROGATORY NO. 46: In what year did Defendant begin selling or distributing products containing asbestos?

ANSWER NO. 46: See attached Exhibit No. 1.

INTERROGATORY NO. 47: In what year did Defendant last sell products containing asbestos?

ANSWER NO. 47: See attached Exhibit No. 1.

INTERROGATORY NO. 48: Has Defendant ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or

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contracted to supply products containing asbestos? If so, for each such entity, state:

A. Full and correct name.

B. Principal place of business.

C. State of incorporation.

D. Date of acquisition by Defendant.

E. Whether or not authorized to transact business in the State of Oklahoma.

F. Attach copies of all papers pertaining to the acquisition.

ANSWER NO. 48: United States Gypsum Company acquired the assets of National Asbestos Manufacturing Company in 1936. National Asbestos Manufacturing Company was located in New Jersey and no longer exists as a corporate entity. Said company was a producer of asbestos-containing pipe covering.

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

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

INTERROGATORY NO. 49: Was each of your products generally expected to reach, or was packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the

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Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER NO. 49: This defendant's asbestos-containing products were packaged to minimize damage in transport; however, the products may have been altered or modified by others before reaching the parties named in this interrogatory.

INTERROGATORY NO. 50: Do you admit that asbestos applicators, helpers, mechanics, pipefitter/welders, and/or other construction trade crafts were foreseeable users of Defendant's asbestos-containing products, such as:

A. Pipe covering;

B. Blocks;

C. Asbestos cloth;

D. Mastics;

E. Spray-on insulation;

F. Rope or tape;

G. Asbestos sheeting or millboard;

H. Cements;

I. Gaskets or gasket materials.

ANSWER NO. 50: This defendant objects to this interrogatory on the basis that it constitutes an improper form of discovery in that plaintiff is submitting a request for admission. This defendant further objects to the interrogatory on the basis that it is vague in that no time period as to when the submitted fact was foreseeable is indicated.

INTERROGATORY NO. 51: Based upon the material contents of your products, the method of manufacturing, and the method of

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application, can your products be generally applied without liberating asbestos fibers?

A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by exact manufacturer's name and popular name.

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

ANSWER NO. 51: Objection. This Interrogatory is vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 52: Was it a foreseeable use of your asbestos-containing products that they may have to be removed, stripped, or replaced at any time after installation?

ANSWER NO. 52: Objection. This Interrogatory is vague and ambiguous. Without waiving its objection, this defendant states that it would be foreseeable that its asbestos-containing products would be removed, stripped or replaced some time after installation.

INTERROGATORY NO. 53: Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to go to areas where your products were being used or installed to make dust level counts? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the findings, and attach the results.

ANSWER NO. 53: Objection. This Interrogatory is overbroad, burdensome, vague and ambiguous. Without waiving its objection,

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this Defendant states that not to its best current knowledge, information and belief.

INTERROGATORY NO. 54: If your company performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER NO. 54: Not applicable.

INTERROGATORY NO. 55: Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

A. Name of the person or firm conducting such studies.

B. The date the studies began and the date they were completed.

C. Any publication or dissemination of the results of the studies.

D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers.

E. Attach copies of the studies.

ANSWER NO. 55: Objection. This interrogatory is overbroad, burdensome, vague and ambiguous. Without waiving its objection, this Defendant states not to its best current knowledge, information and belief.

INTERROGATORY NO. 56: Does your company have, has it ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

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A. How much time and money was expended each year on research?

B. What percentage of gross sales did your company or its predecessor spend on research concerning the health effects of asbestos?

C. State in detail the purpose, duties, and responsibilities of such Research Department.

ANSWER NO. 56: (a-b) Objection. This Interrogatory is irrelevant and will not lead to discovery of admissible evidence.

(c) This defendant has had a Research Department since 1921. The Research Department does not deal with scientific and/or medical research, but rather is devoted to product development. The focus of the Research Department has never been solely the research and development of asbestos-containing products.

INTERROGATORY NO. 57: Does your company have, or has it ever had, or has your predecessor(s) ever had, a Medical Department? If so, state:

A. The year such Medical Department was established.

B. Whether or not such Medical Department has operated continuously since being established.

C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address of each.

D. State in detail the duties and responsibilities of such Medical Department.

ANSWER NO. 57: Yes.

(a) 1939

(b) Yes.

(c) U. S. Gypsum's Chief Medical Officers: C. A. Hedblom, M.D., 101 South Wacker Drive, Chicago, Illinois, 1974-Present; W. Highstone, M.D., 1939-1974 (deceased).

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(d) The Medical Director operates a medical facility in Company general offices; conducts and manages a medical program; and furnishes counsel as required to assure the health and well being of Company employees.

INTERROGATORY NO. 58: Did your company or its predecessor(s) ever place any warning directly on any of its asbestos-containing products, such as pipe covering itself, block itself, cloth itself, or millboard itself?

ANSWER NO. 58: Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 59: Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, millboard, or gasket material?

ANSWER NO. 59: Not to this defendant's best current knowledge, information and belief.

INTERROGATORY NO. 60: Has your company, or your predecessor(s), ever devised a high-temperature heat insulation which does not contain asbestos? If so, state the date that such insulation was first placed on the market.

ANSWER NO. 60: Objection. This Interrogatory is overbroad in that it is not limited to asbestos-containing products, the focus of this litigation, and therefore will not lead to the discovery of admissible evidence. Further, this Interrogatory is vague and ambiguous.

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INTERROGATORY NO. 61: Did your company or its predecessor(s) ever recall any products containing asbestos from the common market? If so, state:

A. All details of such recall.

B. The name of the product recalled.

C. The time of recall.

D. Any further action taken in connection with the recall.

ANSWER NO. 61: Objection. This Interrogatory is vague and ambiguous. Without waiving its objection, U. S. Gypsum has not conducted a recall of any of its products because of any alleged health hazards associated with asbestos.

INTERROGATORY NO. 62: Prior to 1970, did your company, or any predecessor(s), ever manufacture or sell a high-temperature heat insulation which does not contain asbestos? If so, state the date such insulation was first placed on the market.

ANSWER NO. 62: Objection. See this defendant's response to Interrogatory No. 60.

INTERROGATORY NO. 63: If your company, or its predecessor(s), ever devised a high-temperature heat insulation which does not contain asbestos, state what prompted your company to devise such high-temperature heat insulation not containing asbestos.

ANSWER NO. 63: See this defendant's response to Interrogatory No. 60.

INTERROGATORY NO. 64: Has such high-temperature heat insulation not containing asbestos performed satisfactorily, e.g., is such insulation suitable for the purpose for which it is to be used?

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ANSWER NO. 64: See this defendant's response to Interrogatory No. 60.

INTERROGATORY NO. 65: Give the trade names of your high-temperature heat insulation products which do not contain asbestos, and state fully what such insulation contains.

ANSWER NO. 65: See this defendant's response to Interrogatory No. 60.

INTERROGATORY NO. 66: State the decade that there first existed manufacturing technology for commercial purposes, the use of chemical sand mineral for combining into a high-heat insulation product as a substitute for asbestos in insulation materials.

ANSWER NO. 66: See this defendant's response to Interrogatory No. 60.

INTERROGATORY NO. 67: To your company's knowledge, in what decade was fiberglass first commercially available for insulation over 350 degrees Fahrenheit?

ANSWER NO. 67: Objection. This Interrogatory is overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Such information, the extent that it exists, would be equally available to plaintiff as to this defendant.

INTERROGATORY NO. 68: In what decade was each of the following products commercially available for use and sale:

A. Fiberglass;

B. Calcium silicate;

C. Mineral wool;

D. Rock wool;

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E. Foamglass;

F. Ceramics;

G. Wood pulp;

H. Organic pulp.

ANSWER NO. 68: Objection. This Interrogatory is overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Such information, the extent that it exists, would be equally available to plaintiff as to this defendant.

INTERROGATORY NO. 69: Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER NO. 69: Objection. This Interrogatory is vague, ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, this Defendant would state that prior to 1940, a group within U. S. Gypsum's corporate structure was engaged in contracting. It is unknown whether said group formally was a "division" or "unit", as no documents have been located from which to verify this information. U. S. Gypsum has no further information.

INTERROGATORY NO. 70: Did any division of your company or subsidiary company engaged in the contract business of applying

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insulation products, or your worker's compensation insurance carrier, ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is in the affirmative, give the name of such employees and attach copies of such claims, along with copies of all documents relating to the disposition and handling of such claims.

ANSWER NO. 70: Objection. See this defendant's response to Interrogatory No. 69. U. S. Gypsum further objects that there is no allegation that the plaintiff was ever an employee of this defendant. Without waiving its objection, U. S. Gypsum further states that to its best current knowledge, information and belief, no worker's compensation claims were filed for asbestos-related lung diseases against its contracting units or divisions.

INTERROGATORY NO. 71: Was your Medical Department or Industrial Health Department or Industrial Hygienist responsible for the screening of contracting unit employees?

ANSWER NO. 71: See this defendant's response to Interrogatory No. 69.

INTERROGATORY NO. 72: Did your company or its predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys and attach copies.

ANSWER NO. 72: Objection. No allegations have been made that the plaintiffs were employees of the defendant; therefore, this interrogatory is overly broad, irrelevant, immaterial and not

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reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 73: As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, state:

A. The year in which Defendant or any predecessor(s) were first advised of such limits or concentrations.

B. The name of the employee or official of the company receiving such advice.

C. Attach copies of the instrument(s) communicating such advice.

ANSWER NO. 73: This defendant objects to this Interrogatory on the grounds that it is vague and ambiguous. Furthermore, this defendant objects to this Interrogatory on the grounds that it is overbroad insofar as it relates to dust in general. Without waiving its objection, United States Gypsum Company understands the term "threshold limit value" to mean a concentration to which nearly all workers can be exposed, day after day, without adverse effect.

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

This defendant has not located, at this time, information indicating when it first became aware of the term.

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INTERROGATORY NO. 74: Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 73 for total dust, and not just asbestos dust?

ANSWER NO. 74: See this defendant's response to Interrogatory No. 73.

INTERROGATORY NO. 75: State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using your asbestos-containing products.

ANSWER NO. 75: U. S. Gypsum is aware of tests which were performed to measure the release of asbestos fibers during the mixing and sanding of joint compounds.

INTERROGATORY NO. 76: When did any official with your company first have knowledge, information, or understanding that asbestos would, could, or might produce the disease of:

A. Asbestosis;

B. Mesothelioma;

C. Lung cancer;

D. Any other diseases.

E. With reference to your company, give the name of the official who first had such knowledge, information, or understanding.

F. If there are any documents, records, or memoranda of any kind concerning such knowledge, list and attach copies of each.

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ANSWER NO. 76: See attached Exhibit No. 6.

PRAY, WALKER, JACKMAN,
WILLIAMSON & MARLAR

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ATTORNEYS FOR DEFENDANT
UNITED STATES GYPSUM COMPANY

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STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

I, F. M. Poremski, declare:

I am the Manager, Financial & Accounting 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 Plaintiffs' 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 April 21, 1988 in Chicago, Illinois.

F. M. Poremski

Subscribed and sworn to before me
this 21st day of April, 1988.

Notary Public

" OFFICIAL SEAL "
ARLENE J. FUHS
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 1/2/91

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Exhibit 1

	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
	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
	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
	Acoustical Plaster	1955	1972	New Brighton, NY Fort Dodge, IA
l	Finish Plaster	1930	1935	Gypsum, OH
		1930	1935	East Chicago, IN Fort Dodge, IA New Brighton, NY
		1950	1951	Fort Dodge, IA
erior r	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
	Finish Plaster	1942	1954	Southard, OK
	Finish Plaster	1929	1947	Gypsum, OH New Brighton, NY
er		1942	1946	Nephi, UT
		1942	1951	Milwaukee, WI
		1944	1947	South Gate, CA
Fiber lar	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

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

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Product Name	Product Type/Use	(Dates Approximately) First Produced	Last Produced	Manufacturing Locations
Pyrobar Mortar Mix	Aggregated plaster	1969 1969	1970 1972	East Chicago, IN New Brighton, NY
Sheetrock Radiant Heat Filler - Machine Application	Specialty plaster	1971	1972	Empire, NV
Bondcrete	Basecoat	1940	1943	Midland, CA
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
Pac-Tex	Texture	1943	1963	South Gate, CA Dallas, TX Sweetwater, TX

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

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

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

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

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

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

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

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PERCENTAGE OF ASBESTOS (VOLUME)

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

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

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

TEXTURE PRODUCTS	DATE	PERCENT ASBESTOS
PAC-TEX	1943	4.5
	1953	4.5 - 6.0
	1954	3.5

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

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

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

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

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

Miscellaneous Specialty Plasters - Generally less than 1%

Fireproofing Plasters

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

Ceiling Tile

Acoustone 120*	Approximately 3%
Acoustone 180	Approximately 3%

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

Paste Spackling Putty - Approximately 3%

Pipecoverings - Approximately 30 - 91%

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*Not all formulations contained asbestos.

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Asbestos-Containing Products - Reasons for Discontinuation:

I. Sabinite was replaced by Audicote and Hi-Lite in the marketplace. Audicote and Hi-Lite were discontinued because the low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.

II. Cost of Compliance with proposed lower OSHA standards within the plant.

III. At the direction of Sprayon Research Corporation.

IV. The low profitability of these products did not justify the expense of research efforts to reformulate without asbestos.

V. Low Profitability.

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

* Includes production by subsidiary.

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

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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

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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.

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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.

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Fort Dodge, Iowa cont.

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

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South Gate, California

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.

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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 now it acquired this knowledge.

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, has stated in his deposition that he attended a conference in 1955, at which papers discussing this relationship were presented.

Documents produced in other litigation pertaining to this issue have come to U. S. Gypsum's attention. These documents were produced by other parties; U. S. Gypsum has not found them in its own files and can make no representations concerning the origin or authenticity of those documents. The documents suggest that in approximately October 1948, U. S. Gypsum may have received a draft report concerning inhalation experiments on laboratory animals exposed to high levels of asbestos dust. It was reported that some of the animals developed lesions described variously as lung cancer and non-malignant adenomas. U. S. Gypsum believes that these are the same experimental results reported to the National Cancer Institute by Dr. L. U. Gardner in 1943 and Dr. Kenneth M. Lynch in 1947 and referred to

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by Drs. Lynch, McIver and Cain in their 1956 published article, "Pulmonary Tumors In Mice Exposed To Asbestos Dust," 15 A.M.A. Archives of Industrial Health 207 (March 1957), which was received for publication in 1956.

United States Gypsum Company is now aware that the first published study which established a direct association between the inhalation of asbestos fibers and the development of mesothelioma was the 1960 epidemiological study entitled "Diffuse Pleural Mesothelioma and Asbestos Exposure in the North Western Cape Province" by J. C. Wagner, et al., which described mesothelioma occurrence among persons exposed to crocidolite, at or near crocidolite mines in South Africa.

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

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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 defendan in litigation by Gypsum Association. This defendant does not know if such individuals actually attended meeting listed in documents produc to this defendant by Gypsu Association in other litigation. Also, some test results are in this defendant's files.

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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)

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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	1973-1974	unknown	Minutes produced in other litigation (Wm. Simpson deposition) (1958-?)
(Founded in 1958) (Now TIMA) Thermal Insulation Manufacturers Association	1974-present	none	Some mass correspondence letters regarding committe J. D. Cornell was on - health and safety, public information, medical and scientific dated 1978 to t. 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 presentation and papers produced at Phillip E. Schmidt, deposit and document production April 17, 1984, in Neil Woo
National Mineral Wool Association	1943?-1957 mid-1960's mid-1970's	none	none

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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
*Contracting Plaster and Lathers International (Associate Member)	1960-1969	none	Some documents in M. V. Cook's and J. Edwards' fi
*International Association Wall and Ceiling Contractors (Associate Member)	1970-1976	none	Some documents in M. V. Cook's and J. Edwards' fil
*Gypsum Drywall Contractors International (Associate Member)	1960-1976 unknown	none	Some documents in M. V. Cook's and J. Edwards' fil
*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' fil
*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

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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 frc 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	

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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
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

*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

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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-OD
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.

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

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

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

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