

GP Ans to Inter

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States. Georgia-Pacific will make available for inspection by Plaintiff's counsel records concerning the sales of its asbestos-containing products, at the individual distribution centers located throughout the United States at a time mutually convenient to all parties.

~~11.~~ For the period 1920 to date, state the addresses of each facility, building, mine, mill or location which was used by you as a mining, milling, manufacturing or processing facility of asbestos or asbestos-containing products; and further state the inclusive dates such facilities were in operation.

ANSWER: The relevant manufacturing facilities to Plaintiff's geographical area were located at 1581 East 98th Street, Chicago, Illinois and Bloomingdale Road, Akron, New York. The Chicago plant was in operation between 1968 and 1981. The Akron plant has been in operation since 1956. Georgia-Pacific has never mined, milled or manufactured asbestos.

12. Please list each asbestos-containing product mined, manufactured, sold, marketed and/or distributed by Defendant, Defendant's predecessors, and Defendant's subsidiaries at any time since 1930; and please state the following for each named product:

A. The year it was first mined, manufactured, sold, marketed, or distributed, and if discontinued, the year and the reason such mining, manufacturing, sale, marketing or distribution stopped;



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B. The years during which the product was mined, manufactured, sold, marketed or distributed;

C. Whether or not said product was ever manufactured, sold, marketed or distributed in the State of Michigan, and the time period during which such manufacture, sale, marketing or distributing took place;

D. The name and address, per year, and per product, of each customer in the State of Michigan purchasing in excess of \$1,000.00 per year of a product during any year;

E. The address(es) at which the product was mined or manufactured.

F. Whether any documents of any kind indicating or reflecting such sale or supply exist (including, but not limited to, invoices, bid and specification sheets, purchase records, conformations, bills of lading, accounts payable or accounts receivable records, etc.), and if so, please identify each such document.

ANSWER:

All Purpose Joint Compound:

- A. Approximately 1967.
- B. Approximately 1967 to present.
- C. Georgia-Pacific will make available for inspection by Plaintiff's counsel records concerning the sales of its asbestos-containing products at its headquarters in Atlanta, Georgia and the relevant

distribution centers in the State of Michigan at a time mutually convenient to all parties.

D. See response to Interrogatory No. C above.

E. Akron, New York, Marietta, Georgia, Acme, Texas and Chicago, Illinois.

F. Yes. See response to Interrogatory No. C above.

Bedding Compound:

A. 1956.

B. 1956 to present.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Acme, Texas, Akron, New York, Chicago, Illinois and Marietta, Georgia.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Central Mix:

A. Approximately 1970. The product was discontinued in 1973 due to poor sales.

B. Approximately 1970 to 1973.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

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D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Acme, Texas and Marietta, Georgia.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Drywall Adhesive:

A. Approximately 1972. The product was discontinued in 1972 for unspecified reasons.

B. Approximately 1972.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Akron, New York.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Joint Compound:

A. 1956.

B. 1956 to present.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

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E. Akron, New York, Acme, Texas, Chicago, Illinois, Blue Rapids, Kansas and Marietta, Georgia.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Kalite:

A. 1956. The product was discontinued in approximately 1959 due to poor sales.

B. 1956 to 1959.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Akron, New York and Acme, Texas.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Laminating Compound - Ready Mix:

A. Approximately 1969. The product was discontinued in 1969 for unspecified reasons.

B. 1969.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Akron, New York.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Lite Acoustic:

A. Approximately 1958. The product was discontinued in approximately 1963 due to poor sales.

B. Approximately 1958 to 1964.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Akron, New York, Acme, Texas, Blue Rapids, Kansas, Brunswick, Georgia, Sigurd, Utah, Fort Dodge, Iowa and Grand Rapids, Michigan.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Patching Plaster:

A. Approximately 1956.

B. Approximately 1956 to present.

C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

E. Blue Rapids, Kansas, Brunswick, Georgia and Acme, Texas.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Ready Mix:

- A. Approximately 1963.
- B. Approximately 1963 to present.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas, Chicago, Illinois, Milford, Virginia, Akron, New York, Fort Dodge, Iowa, Brunswick, Georgia and Marietta, Georgia.
- F. See response to Interrogatory No. C. above concerning All Purpose Joint Compound.

Spackling Compound:

- A. Approximately 1956. The product was discontinued in approximately 1970 or 1971 due to no market for the product.
- B. Approximately 1956 to 1970 or 1971.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas and Chicago, Illinois.

F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Speed Set:

- A. Approximately 1962.
- B. Approximately 1962 to present.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas and Blue Rapids, Kansas.
- F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Texture:

- A. 1956.
- B. 1956 to present.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas, Akron, New York, Marietta, Georgia, Chicago, Illinois and Sigurd, Utah.
- F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Topping Compound:

- A. 1956.
- B. 1956 to present.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas, Chicago, Illinois, Akron, New York and Marietta, Georgia.
- F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

Triple Duty Joint Compound:

- A. Approximately 1965.
- B. Approximately 1965 to present.
- C. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- D. See response to Interrogatory No. C above concerning All Purpose Joint Compound.
- E. Acme, Texas, Akron, New York, Marietta, Georgia and Chicago, Illinois.
- F. See response to Interrogatory No. C above concerning All Purpose Joint Compound.

13. Please state the following for each asbestos-containing product mined, manufactured, sold, marketed