

1 Attorney Name(s) or Party without Attorney  
2 Firm Name  
3 Firm Address  
4 City, State, Zip Code  
5 Phone Number(s)  
6 Fax Number  
7 Email Address

8 Attorney for (Name) or Self-Represented

9 **SUPERIOR COURT OF CALIFORNIA**

10 **COUNTY OF SAN FRANCISCO**

11 PLAINTIFF'S NAME,

12 Plaintiff,

13 vs.

14 DEFENDANT'S NAME,

Defendant

Case Number:

**ASBESTOS – EXHIBIT H  
NOTICE OF SERVICE  
(CASE SPECIFIC STANDARD  
INTERROGATORIES)**

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# EXHIBIT H



1 **PLAINTIFFS' CASE SPECIFIC STANDARD INTERROGATORIES TO**  
2 **DEFENDANTS [SET ONE]**

3 PROPOUNDING PARTY: Defendants

4 RESPONDING PARTY:

5 SET NO.: One

6  
7 **PREFACE**

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9 Unless otherwise specifically set forth herein, the DESCRIBED SITE(S) for which  
10 you must respond are those listed in PLAINTIFF'S notice sent to you to initiate your  
11 responses to these Interrogatories and any other DESCRIBED SITE(S) known to you at  
12 which PLAINTIFF was exposed to asbestos.

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14 Any information provided by any DEFENDANT in answer to General Order  
15 Interrogatories need not be repeated in answer to these follow-up interrogatories,  
16 except that a DEFENDANT must provide more specific information which is responsive  
17 to a specific designation of a DESCRIBED SITE if not included in previous answers.  
18 (Thus, for example, a DEFENDANT which has responded to the Standard  
19 Interrogatories regarding a particular facility in general must provide such information as  
20 it has regarding the particular unit in the facility identified as a PLAINTIFF'S  
21 DESCRIBED SITE.)

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23 Hospitals and other health care entity defendants shall provide responses related  
24 only to that defendant's physical facilities and shall not be required to disclose any  
25 information related to the furnishing of services to patients.  
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1 **DEFINITIONS**

2 1. "AREA(S)" or "IDENTIFIED WORK" means the contract or subcontract,  
3 specific structure, building, building number, floor of the building, ship, process line, unit,  
4 piece of equipment or other specific place within each WORKSITE and PREMISES  
5 where PLAINTIFF worked and/or where the PLAINTIFF was exposed and/or the  
6 location that was the source of that exposure.  
7

8 2. "ASBESTOS-CONTAINING PRODUCT(S)" shall mean a product(s) which  
9 this defendant knows or believes to have contained any amount of the mineral asbestos  
10 at any time.  
11

12 3. "COMPANY" means any private enterprise including corporations,  
13 partnerships, joint ventures, and sole proprietorships.  
14

15 4. A "CONTRACT UNIT" shall mean a branch, division, subsidiary or other  
16 affiliated entity of a DEFENDANT which has been or is now engaged in installation,  
17 disturbing or handling and/or removal of RAW ASBESTOS and/or ASBESTOS-  
18 CONTAINING PRODUCTS.  
19

20 5. "DESCRIBED SITES" means the PREMISES, JOBSITES, or  
21 WORKSITES, including, if available, AREAS of IDENTIFIED WORK.  
22

23 6. "DOCUMENT(S)" or "WRITING(S)" shall include all writings as defined by  
24 Section 250 of the California Evidence Code.  
25

26 7. "GEOGRAPHIC AREA" means the 46 counties of Northern California  
27 (Alameda, Alpine, Amador, Butte, Calaveras, Colusa, Contra Costa, Del Norte, El  
28 Dorado, Fresno, Glenn, Humboldt, Kern, Kings, Lake, Lassen, Mann, Mariposa,  
Mendocino, Merced, Modoc, Mono, Monterey, Napa, Nevada, Placer, Plumas,

1 Sacramento, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz,  
2 Shasta, Sierra, Siskiyou, Solano, Sonoma, Stanislaus, Sutter, Tehama, Trinity, Tulare,  
3 Tuolumne, Yolo, Yuba) and military facilities/installations in the State of California, or  
4 the following shipyards: Bethlehem Shipbuilding, San Pedro; California Shipbuilding,  
5 Terminal Island; Consolidated Steel Shipyard, Wilmington; Los Angeles Shipbuilding  
6 and Dry Dock aka L.A. Ship, San Pedro; National Steel and Shipbuilding Corporation,  
7 San Diego; Todd Shipyards Corporation, San Pedro; Triple "A" Machine, San Diego;  
8 Western Pipe and Steel Company, Los Angeles and San Pedro Divisions; Naval Air  
9 Station, North Island; Thirty-second Street Naval Repair Facility, San Diego; Long  
10 Beach Naval Shipyard; and San Diego Destroyer Base.  
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13 8. Request to IDENTIFY a "WRITING" or "DOCUMENT" or study shall mean  
14 a request to either attach such an exhibit to your answers to these Interrogatories, or to  
15 describe such with sufficient particularity that it may be made the subject of a request  
16 for production of documents. YOUR description should include an indication of: (a) the  
17 author; (b) addressee(s); (c) date of origin; (d) the nature of the writing or document  
18 (e.g., letter, telephone memorandum, audio tape recording, photograph, etc.); and (e) its  
19 present location, name and present address of custodian thereof.  
20

21 9. A request to "IDENTIFY" an oral communication shall mean a request to  
22 describe the communication with particularity, and shall include the following  
23 information; (a) the identity of all parties to the communication; (b) the identity of the  
24 person whom you contend initiated the communication; (c) the identity of all persons  
25 present at the time of the communication; and (d) the time, date and place of the  
26 communication.  
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1           10. A request to "IDENTIFY" or to state the "IDENTITY" of a person or  
2 individual means to state his or her name, the place of employment, job title, present  
3 business or present or last known home address, years of employment and last known  
4 telephone number if not employed by DEFENDANT.  
5

6           11. A request to "IDENTIFY" the product shall mean a request to describe the  
7 product, the material or compound by the following means: (1) by nickname or slang  
8 name used in your industry and/or occupation; (2) by the name under which it is sold in  
9 the marketplace (trade name); and (3) by its generic name.  
10

11           12. "JOBSITE(S)" or "WORKSITE(S)" means any location other than a  
12 PREMISES at which PLAINTIFF claims exposure to asbestos.

13           13. "MARKET" (MARKETing, MARKETed) shall mean the mining, supply,  
14 sale, labeling, distribution, importing, processing or manufacture of RAW ASBESTOS  
15 and/or ASBESTOS-CONTAINING PRODUCT(S).  
16

17           14. A request to describe the "NATURE" of a product means to describe the:  
18 (a) color; (b) texture; (c) form (i.e., powder, liquid, paste, solid, board, cloth, blanket,  
19 wire insulation, etc.); (d) physical dimensions, if solid (length, width and height); (e) the  
20 type of shipping package and shipping package dimensions if not solid; (f) type of  
21 asbestos fiber used in the composition of the product (e.g., chrysotile, amosite,  
22 crocidolite); (g) the intended use or function of such product as recommended by this  
23 DEFENDANT as the miner, producer, supplier, contractor, manufacturer, distributor,  
24 owner or seller; and (h) the type of worksite in which it was intended to be used (e.g.,  
25 shipyard, refinery, commercial building construction, manufacturing plant, home, power  
26 generating plant, etc.).  
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1           2.     Provide a description of the work to be performed by each party to  
2 the contract and a description of the DESCRIBED SITE where work was to be  
3 performed under the contract;

4           3.     IDENTIFY and describe the NATURE of the RAW ASBESTOS or  
5 ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the  
6 performance of the contract;

7           4.     IDENTIFY the person or entity from which the RAW ASBESTOS or  
8 ASBESTOS-CONTAINING PRODUCTS were obtained;

9           5.     State the dates of the contract and the dates of performance;

10          6.     IDENTIFY all records which identify persons who worked at the  
11 DESCRIBED SITE.

12          b.     Either attach all DOCUMENTS, or discs containing such data, evidencing  
13 the information sought in this interrogatory and its subparts to your answer to these  
14 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
15 be made the subject of a request for production of documents.

16          c.     IDENTIFY the person(s) presently most knowledgeable about the  
17 information sought in this interrogatory or its subparts.

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22 **INTERROGATORY No. 2: (To Manufacturer Or Distributor Defendants Only)**

23           Were any of THIS DEFENDANT'S RAW ASBESTOS or ASBESTOS-  
24 CONTAINING PRODUCTS sold, shipped, MARKETED, or otherwise distributed either  
25 to or for use at the DESCRIBED SITES at or before the time designated in the notice? If  
26 so:  
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1 a. IDENTIFY and state the NATURE and quantity of the RAW ASBESTOS or  
2 ASBESTOS-CONTAINING PRODUCTS;

3 b. IDENTIFY to whom said RAW ASBESTOS or ASBESTOS-CONTAINING  
4 PRODUCTS were sold;

5 c. IDENTIFY to whom said RAW ASBESTOS or ASBESTOS-CONTAINING  
6 PRODUCTS were shipped;

7 d. Either attach all DOCUMENTS, or discs containing such data, evidencing  
8 the information sought in this interrogatory and its subparts to your answer to these  
9 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
10 be made the subject of a request for production of documents.  
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12 e. IDENTIFY the person(s) presently most knowledgeable about the  
13 information sought in this interrogatory or its subparts.  
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17 **INTERROGATORY No. 3: (For Premises Defendants Only)**

18 Did YOU install, remove, handle or disturb RAW ASBESTOS or  
19 ASBESTOSCONTAINING PRODUCTS at any DESCRIBED SITE at or before the time  
20 designated in the notice? If so:

21 a. IDENTIFY the PREMISES.

22 b. For each of the PREMISES:

- 23 1. State the nature of your ownership or possessory interest;
- 24 2. State the inclusive date of that interest;
- 25 3. IDENTIFY the party from whom that interest was acquired;
- 26 4. IDENTIFY the party, if any, to whom that interest was transferred.  
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1 c. IDENTIFY every contract to which YOU were a party or of which YOU  
2 have knowledge wherein the performance of such contract involved the installation,  
3 removal, disturbing or handling of any RAW ASBESTOS or ASBESTOS-CONTAINING  
4 PRODUCTS at YOUR PREMISES. For each such contract:

5  
6 1. IDENTIFY the parties to the contract;

7 2. Provide a general description of the work to be performed by each  
8 party to the contract;

9 3. IDENTIFY and describe the NATURE of the RAW ASBESTOS or  
10 ASBESTOS-CONTAINING PRODUCTS installed, removed, disturbed or handled in the  
11 performance of the contract;

12 4. State the dates of the contract and the dates of performance;

13  
14 d. Except as provided in response to subpart (C), has any work other than  
15 routine maintenance been done on or to the PREMISES that involved the installation,  
16 removal, disturbing or handling of RAW ASBESTOS or ASBESTOS-CONTAINING  
17 PRODUCTS? If so, for each such instance:

18  
19 1. State the inclusive dates of the work;

20 2. State the specific location of the work;

21 3. Provide a general description of the work;

22 4. State whether the work was done by YOU or YOUR employees;

23 5. IDENTIFY and describe the NATURE of the RAW ASBESTOS or  
24 ASBESTOS-CONTAINING PRODUCTS installed, removed, handled or disturbed;

25 6. IDENTIFY from whom the RAW ASBESTOS OR ASBESTOS-  
26 CONTAINING PRODUCTS were acquired.  
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1 e. Has any asbestos abatement effort been made at the DESCRIBED  
2 SITES? If so, for each such effort:

3 1. IDENTIFY who did the work;  
4  
5 2. State the inclusive dates thereof;  
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7 3. State whether samples were taken, and, if the samples still exist,  
8 IDENTIFY the custodian of the samples;

9 4. State whether any material was tested, and, if so, what were the  
10 results of each test;

11 5. IDENTIFY each test result with sufficient particularity for purposes  
12 of a request for production of documents, or, in the alternative, attach a copy to YOUR  
13 answers to these interrogatories.

14 f. Except for insurance coverage litigation, have you filed suit against, or  
15 otherwise sought to recover from, any person or entity for some or all of the cost of  
16 asbestos abatement or for the property damage allegedly caused by the presence of  
17 RAW ASBESTOS or ASBESTOSCONTAINING PRODUCTS on the PREMISES? If so:

18 1. IDENTIFY the person or entity against whom YOU have filed suit or  
19 otherwise sought to recover;

20 2. If YOU have filed suit, state the court in which the action was filed,  
21 the date on which it was filed, IDENTIFY all Plaintiffs and Defendants and their counsel  
22 of record;

23 3. State whether or not the case has been resolved, and, if so, what  
24 was the status or disposition.  
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1 g. Either attach all DOCUMENTS, or disks containing such data, evidencing  
2 the information sought in this Interrogatory and its subparts to your answers to these  
3 Interrogatories, or describe such DOCUMENTS with sufficient particularity that they  
4 may be made the subject of a request for production of documents.  
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6 h. IDENTIFY the person(s) presently most knowledgeable about the  
7 information sought in this interrogatory or its subparts.  
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9 **INTERROGATORY No. 4: (Premises And Contractor Defendants Only)**  
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11 At or before the time designated in the notice, did YOU require PLAINTIFF to  
12 wear a respirator or face mask? If so:

13 a. IDENTIFY the individual(s) who communicated this requirement to the  
14 PLAINTIFF;

15 b. State the date(s) this requirement was first communicated to the  
16 PLAINTIFF;

17 c. State the means by which this requirement was communicated;

18 d. Either attach all DOCUMENTS, or discs containing such data, evidencing  
19 the information sought in this interrogatory and its subparts to your answer to these  
20 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
21 be made the subject of a request for production of documents.  
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23 e. IDENTIFY the person(s) presently most knowledgeable about the  
24 information sought in this interrogatory or its subparts.  
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1 **INTERROGATORY No. 5: (Premises Defendants Only)**

2 Did YOU supply contractor or subcontractors with any tools or equipment to be  
3 used by contractors or subcontractors (or their employees) working in the AREA where  
4 the PLAINTIFF worked at the DESCRIBED SITES during the installation, removal,  
5 handling or disturbing of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS?  
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7 If so, for each occasion:

8 a. Describe the tools or equipment supplied;  
9 b. IDENTIFY to whom the tools or equipment were supplied;  
10 c. State the inclusive dates;  
11 d. Either attach all DOCUMENTS, or discs containing such data, evidencing  
12 the information sought in this interrogatory and its subparts to your answer to these  
13 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
14 be made the subject of a request for production of documents.  
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16 e. IDENTIFY the person(s) presently most knowledgeable about the  
17 information sought in this interrogatory or its subparts.  
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20 **INTERROGATORY No. 6:**

21 Was air sampling ever conducted at any of the DESCRIBED SITES in which  
22 YOU had an ownership or possessory interest or where YOU performed services or  
23 where YOUR products were installed? If so, for each occasion:  
24

- 25 a. Describe why the sampling was conducted;  
26 b. Describe the results thereof;  
27 c. Set forth the dates on which said samplings were performed;  
28

1 d. Describe the location or locations within the DESCRIBE SITE where the  
2 samplings were obtained;

3 e. IDENTIFY the person(s) presently most knowledgeable about the information  
4 sought in this interrogatory or its subparts.  
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6 f. Either attach all DOCUMENTS, or discs containing such data, evidencing the  
7 information sought in this interrogatory and its subparts to your answer to these  
8 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
9 be made the subject of a request for production of documents.  
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12 **INTERROGATORY No. 7:**

13 At any time during or after the time designated in the notice, was bulk sampling  
14 conducted at any of the DESCRIBED SITES in which you had an ownership or  
15 possessor interest? If so:

16 a. Describe why the sampling was conducted;

17 b. Describe the results thereof;

18 c. Set forth the dates on which such samplings were performed;

19 d. Describe the location or locations within the DESCRIBED SITE where the  
20 samplings were obtained;  
21

22 e. IDENTIFY the person(s) presently most knowledgeable about the  
23 information sought in this interrogatory or its subparts.  
24

25 f. Either attach all DOCUMENTS, or discs containing such data, evidencing  
26 the information sought in this interrogatory and its subparts to your answer to these  
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1 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
2 be made the subject of a request for production of documents.

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5 **INTERROGATORY No. 8: (Premises And Contractor Defendants Only)**

6 For each instance that work was performed by contractors or subcontractors at  
7 any of the DESCRIBED SITES involving the installation, the disturbing, handling or  
8 removal of RAW ASBESTOS or ASBESTOS-CONTAINING PRODUCTS, state what  
9 measures, if any, were taken by YOU or YOUR employees to provide a safe working  
10 environment as regards asbestos exposure in the AREAS where the PLAINTIFF  
11 worked at the designated times. a. IDENTIFY the person(s) presently most  
12 knowledgeable about the information sought in this interrogatory or its subparts. b.  
13 Either attach all DOCUMENTS, or discs containing such data, evidencing the  
14 information sought in this interrogatory and its subparts to your answer to these  
15 interrogatories, or describe such DOCUMENTS with sufficient particularity that they may  
16 be made the subject of a request for production of documents.  
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20 **INTERROGATORY No. 9:**

21 IDENTIFY each person who prepared or assisted in the preparation of the  
22 responses to these interrogatories. (Do not identify anyone who simply typed or  
23 reproduced the responses.)  
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1 **INTERROGATORY NO. 10:**

2           If any person YOU have identified in YOUR answers to these interrogatories has  
3 had his or her deposition taken, IDENTIFY the deposition by the name of the deponent,  
4 the date the deposition was taken, the caption and number of the action in which it was  
5 taken, the court which had jurisdiction over the action in which it was taken (including  
6 state and county), and either the name and address of the court reporting agency which  
7 took the deposition or the name and address of deponent's counsel of record.  
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