PLAINTIFF'S EXHIBIT
UC-1891

No. 2000-05-1962-C

ROBERT HENRY VILLARREAL, Individually and As Personal Representative of the Heirs and Estate of JOHN HENRY VILLARREAL,	§	IN THE DISTRICT COURT
Plaintiff,	§	
vs.	§	CAMERON COUNTY, TX
GAF CORPORATION, et al.,	§	
Defendants.	§	197th JUDICIAL DISTRICT

DEFENDANT AMOCO CORPORATION'S ANSWERS TO PLAINTIFF ROBERT HENRY VILLARREAL'S FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR PRODUCTION AND FIRST REQUEST FOR ADMISSIONS

General Objections

Plaintiffs have directed this discovery to Amoco Corporation. Amoco Corporation at all times relevant to this lawsuit was a financial institution and as such, neither directly owned, operated nor controlled any premises in Texas.

Plaintiff claims to have been exposed at an Amoco refinery in Pasadena, Texas. The majority of these discovery requests seek information as to the "Defendant's Premises" which is defined as locations owned or operated by the Defendant where Plaintiff was exposed to asbestos containing products. Because the plaintiff's claimed exposure is at a refinery, responses are provided as if the discovery was propounded upon both Amoco Corporation and Amoco Oil Company. Answering Defendant Amoco Corporation objects to these requests because neither it nor Amoco Oil Company have owned or operated a refinery in Pasadena, Texas and thus, there is no "Defendant's Premises." Further, there is no information available that plaintiff worked for this defendant or Amoco Oil or on any Amoco Oil premises. All requests for admissions should be deemed denied given plaintiff never worked for defendant or at any of its premises and that the answer is information available to this defendant.

PREPARED FOR LITIGATION

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Those interrogatories, requests for production and requests for admissions not limited to the non-existent Pasadena, Texas refinery are objected to as vague, overbroad and unduly burdensome, and intended as nothing other than a fishing expedition. The answers/responses will be supplemented if discovery provides new job sites or further information.

Answering defendant further objects to the Interrogatories propounded because they are vague, overbroad, and burdensome as they are not limited to any specific location. Without waiving these objections, depending on the job, particular unit or location in the plant a wide range of differing safety equipment was provided to workers. If there had been an Amoco Oil refinery in Pasadena, Texas, Amoco Oil would have required that visitors, contractors, employees and facility employees be protected from potentially harmful materials in the workplace whenever a danger was recognized.

Employees have been and are required to attend safety program meetings to acquaint themselves with the dangers of exposure to materials involved in the workplace, the proper ventilation procedures to use and required equipment. These meetings are weekly. Employee safety manuals describing safety measures were available. Respiratory protection programs required the use of respirators and masks when working with material that released dust into the workplace atmosphere. Outside contractors were required to follow the health and safety regulations of the Plant. They were also given the safety manuals and were required to attend safety meetings

There are numerous safety regulations applicable when working with asbestos. For example, all workers were encouraged to use respiratory equipment. Other precautions such as wet down of materials, rope off of the areas, and change of clothing were just a few of these procedures.

The following responses are based on facts known to or believed by Amoco at all relevant times. Because much of the information sought is from many years ago and is, therefore, difficult or impossible to reconstruct or retrieve, Defendant reserves the right to amend these responses if new or better information becomes available to it or errors are discovered.

The information gathered for these responses comes from many sources, both from within the company and elsewhere. Accordingly, this Defendant can only relay this information; it cannot attest to the accuracy of such responses. Information of this nature is being supplied because it may lead to discovery of admissible evidence. The information thus provided in these responses to Interrogatories or Requests for Production should not be considered as admissions.

INTERROGATORY NO. 1:

For each person who has supplied any information used in answering these interrogatories, state the name, address, job title, length of time employed by Defendant, and year-by-year list of all other positions, titles or jobs held when working for Defendant.

ANSWER: See General Objections.

REQUEST FOR ADMISSION NO. 1:

Admit that Defendant ordered, purchased or otherwise acquired asbestos-containing products, asbestos-containing friction products, and/or machinery requiring the use of asbestos or asbestos-containing products.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 1:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

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REQUEST FOR ADMISSION NO. 2:

Admit that asbestos-containing products, asbestos-containing friction products, and/or machinery requiring the use of asbestos or asbestos-containing products were utilized on Defendant's Premises during the years at issue.

RESPONSE: Denied. Neither Amoco Corporation nor Amoco Oil owned or operated a refinery in Pasadena, Texas. See General Objections.

INTERROGATORY NO. 2:

If you admit the foregoing request, please list all asbestos-containing products used at Defendant's Premises and for each product, state the following:

a. What these products were used for;
b. From whom these products were purchased;
c. Where these products were installed;
d. Specific persons or contractors who installed these products; and
e. The first year each product was no longer purchased and installed on Defendant's Premises.

ANSWER: See General Objections. No defendant's premises as defined exists.

REQUEST FOR PRODUCTION NO. 2:

Produce all ordering and sales documents pertaining to the purchase or acquisition of such asbestos-containing products for use at Defendant's Premises, including but not limited to invoices, price quotations, purchase orders, requisitions, bills of lading, and other purchasing and/or shipping documents of the similar nature.

RESPONSE: See General Objections. No defendant's premises as defined exists.

REQUEST FOR ADMISSION NO. 3:

Admit that during the time Plaintiff was employed by Defendant, it was foreseeable that asbestos-containing products on Defendant's Premises would or could be removed, stripped, replaced or repaired at some time after installation.

RESPONSE: Denied. Defendant and Amoco Oil have no record of employing plaintiff, nor does plaintiff allege to be an employee of defendant or Amoco Oil. Further, since plaintiff has not evidenced an exposure at a premises of defendant, this request for admission has no application to this defendant.

INTERROGATORY NO. 3:

Please state whether any asbestos-containing products in place or in use at Defendant's Premises have been abated at any time.

a. If so, list each person or company that performed such abatement services (including address and telephone number);
b. State the dates and locations of each abatement procedure; and
c. State which asbestos-containing products were abated.

ANSWER: See General Objections. No defendant's premises as defined exists.

REQUEST FOR PRODUCTION NO. 3:

Produce all documents that in any way pertain to abatement of asbestos-containing materials on Defendant's Premises, including but not limited to a removal plan or organized written criteria or schedule for the removal of asbestos at Defendant's Premises, and in operation and maintenance plan.

RESPONSE: See General Objections. No defendant's premises as defined exists.

REQUEST FOR ADMISSION NO. 4:

Admit that Plaintiff worked on premises owned by Defendant or by a predecessor-in-interest of Defendant.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 4:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections. It is impossible to produce documents that prove a negative.

REQUEST FOR PRODUCTION NO. 5:

If you admit the foregoing request, in whole or in part, produce all documents supporting your admission that Plaintift was on Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 6:

Produce all records identifying contractors and/or the employees of contractors who were on your premises during the years at issue, including but not limited to sign-in-logs, gate

records, visitor's logs, identification badge logs and procedures, and other documents of a similar nature.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 7:

Produce all records pertaining to the methods and manner of identification of individuals entering and/or leaving your facilities, during the years at issue, including but not limited to fingerprinting or other methods of identifying contractor employees at your premises, and specifically including any fingerprinting or other records identifying the Plaintiff.

RESPONSE: See General Objections.

INTERROGATORY NO. 4:

Identify the contractors who worked on your premises during the years at issue and for each, state:

a. The type of work performed by the contractor;
b. The dates such work was performed; and
c. Identify your employee responsible for monitoring, verifying, or instructing concerning these services to be performed by such contractors.

ANSWER: See General Objections.

REQUEST FOR PRODUCTION NO. 8:

Produce the contract documents pertaining to the contractors who performed services on Defendant's Premises during the years at issue, including but not limited to invitations to bid, request for proposals, bids, proposals, scope of work, specifications, blueprints, plans, acceptances, contracts, amendments, addenda, change orders, and other contract documents of a similar nature.

RESPONSE: See General Objections.

INTERROGATORY NO. 5:

Identify each employee who was responsible for allowing contractor employee's access to Defendant's Premises during the years at issue.

ANSWER: See General Objections.

REQUEST FOR ADMISSION NO. 5:

Admit that Plaintiff worked on Defendant's Premises where Defendant used or applied asbestos-containing products.

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RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 9:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

INTERROGATORY NO. 6:

Do you contend that Plaintiff was not exposed to asbestos while working at the Defendant's Premise(s)? If the answer is anything other than "no", identify each and every fact which supports this contention.

ANSWER: See General Objections.

REQUEST FOR ADMISSION NO. 6:

Admit that Plaintiff, in the course and scope of his work as an employee of an independent contractor, worked around Defendant's employees who were using and/or applying asbestos-containing products.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 10:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 7:

Admit that Plaintiff worked on and/or around Defendant's Premises in areas where asbestos-containing products were installed, used, prepared for use, replaced or repaired, stored or loaded, unloaded or transported.

RESPONSE: Denied. See General Objections.

REQUEST FOR ADMISSION NO. 8:

Admit that during the time period Plaintiff worked at premises, Defendant was aware that airborne asbestos dust created a potential health hazard to those who breathed such dust.

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RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 11:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 9:

Admit that Defendant was aware of the presence of and/or use of asbestos-containing products on Defendant's Premises during the time period Plaintiff was working on Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 12:

Produce any and all photographs or video-graphic depictions or films depicting the use by you or your employees of any safety precautions (such as containment areas, warning signs, etc.) taken to protect bystanders from the hazards of airborne asbestos resulting from the use of asbestos-containing products by your employees at any locations.

RESPONSE: See General Objections.

INTERROGATORY NO. 7:

Please identify any and all warnings ever given by Defendant, if any, to Plaintiffs regarding the hazards of asbestos and the danger inherent in the inhalation of asbestos fibers.

ANSWER: See General Objections.

REQUEST FOR PRODUCTION NO. 13:

Produce all such warnings.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 10:

Admit that Defendant did not distribute any literature or warnings of any kind to its employees during the period of time Plaintiff worked on Defendant's Premises regarding the potential health hazards to those who breathe airborne asbestos dust.

RESPONSE: Denied. See General Objections. This Request for Admission is impossible to answer in that plaintiff never worked on defendant's premises or any Amoco Oil premises. However, if plaintiff had been on an Amoco premises, employees have been and are required to attend safety program meetings to acquaint themselves with the dangers of exposure to materials involved in the workplace and the proper ventilation procedures to use and required equipment. These meetings are weekly. Employee safety manuals describing safety measures were available. Respiratory protection programs required the use of respirators and masks when working with material that released dust into the workplace atmosphere. Outside contractors were required to follow the health and safety regulations of the Plant. They were also given the safety manuals and were required to attend safety meetings.

REQUEST FOR PRODUCTION NO. 14:

If you deny the foregoing, produce all such warnings.

RESPONSE: See General Objections.

INTERROGATORY NO. 8:

Describe Defendant's safety policy as it relates to the use of asbestos-containing materials at job-sites where Defendant's employees were performing services. In your answer, please state:

a. when, if ever, Defendant's employees were first warned about the hazards of asbestos exposure; and
b. what instructions, if any, were given to Defendant's employees on the identification of materials which might or did contain asbestos.

ANSWER: See General Objections. Answering defendant further objects to this Interrogatory as it is vague, overbroad, and burdensome as it is not limited to any specific location. Without waiving this objection, depending on the job, particular unit or location in the plant a wide range of differing safety equipment was provided to workers. If there had been an Amoco Oil refinery in Pasadena, Texas, (such fact being expressly denied) Amoco Oil would have required that visitors, contractors, employees and facility employees be protected from potentially harmful materials in the workplace whenever a danger was recognized.

Employees have been and are required to attend safety program meetings to acquaint them with the dangers of exposure to materials involved in the workplace and the proper ventilation procedures to use and required equipment. These meetings are weekly. Employee safety manuals describing safety measures were available. Respiratory protection programs required the use of respirators and masks when working with material that released dust into the workplace atmosphere. Outside contractors were required to follow the health and safety regulations of the Plant. They were also given the safety manuals and were required to attend safety meetings.

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There are numerous safety regulations applicable when working with asbestos. For example, all workers were encouraged to use respiratory equipment. Other precautions such as wet down of materials, rope off of the areas, and change of clothing were just a few of these procedures.

REQUEST FOR PRODUCTION NO. 15:

Produce all such safety policies.

RESPONSE: See General Objections. Without waiving these objections, responsive documents located to date are attached.

REQUEST FOR ADMISSION NO. 11:

Admit that Defendant consciously decided not to warn its employees of the dangers of asbestos.

RESPONSE: Denied.

INTERROGATORY NO. 9:

Do you contend that Defendant specifically warned Plaintiff about the hazards of asbestos and asbestos-containing products? If the answer is anything other than "no", identify each and every fact which supports this contention.

RESPONSE: See General Objections.

INTERROGATORY NO. 10:

Describe all safety precautions taken by you or your employees (such as containment areas, warning signs, ventilation systems, evacuating the premises, etc.) for the protection of bystanders (including but not limited to Plaintiffs) from the hazards resulting from the use of asbestos-containing products by your employees at any locations.

ANSWER: See General Objections. Without waiving these objections, see response to interrogatory number 8.

INTERROGATORY NO. 11:

Have you ever provided safety equipment to persons working on Defendant's Premises? If so, please list the safety equipment provided and indicate:

a. when the equipment was first provided;
b. to whom the equipment was provided;

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c. under what circumstances the equipment was provided; and

d. Further, identify the person with the most knowledge of your "safety equipment" policies.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 12:

Admit that Defendant did not continuously provide face masks to contract employees working with or around asbestos from 1945 to the present for the purpose of protecting these employees from inhaling asbestos.

RESPONSE: Denied. See General Objections. See Answer to Interrogatory No. 8.

INTERROGATORY NO. 12:

State in detail what tests have been conducted with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing asbestos-containing products in any of your facilities. Please state where and when these tests were conducted, by whom these tests were conducted, and the results of any such test.

ANSWER: See General Objections. Furthermore, this request is objected to in that it is vague, overbroad and burdensome and not limited in time or place. Without waiving this objection, Amoco states that it has always sought to minimize the inhalation of all dusts, including asbestos, and has sought to implement work practices and industrial hygiene measures to accomplish this. Amoco has always required that visitors, contractors, employees and facility employees be protected from potentially harmful materials in the workplace whenever a danger was recognized. Industrial hygiene surveys for potential occupational exposures, including asbestos, were performed at various sites. Industrial Hygienists made recommendations to contractors and visitors advising them of all perceived hazards. Outside consultants assisted in Industrial Hygiene Surveys.

INTERROGATORY NO. 13:

Do you contend that Defendant, Defendant's representatives, insurance carriers and/or agents performed any measurements and/or studies prior to 1970 to determine the quantity of asbestos fibers in the air at Defendant's facility? If the answer is anything other than "no", identify each and every fact which supports this contention.

ANSWER: See General Objections. Neither Amoco Corporation nor Amoco Oil had a refinery in Pasadena, Texas. Furthermore, this request is objected to in that it is vague, overbroad and burdensome. Additionally, the terms "representatives", "insurance carriers" and "agents" are vague and misleading. Without waiving this objection, and by way of further response, Amoco personnel provided industrial hygiene services to the facilities. The Industrial

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Hygiene Department would make field investigations to the various refineries. In their investigations, they performed industrial hygiene survey and authored survey reports. In addition, outside contractors/consultants were used to assist the Industrial Hygiene Department in performance of local industrial hygiene duties in coordination with local plant management. The Industrial Hygiene Department would share information with the Medical, Toxicology and Safety Departments. These Industrial Hygiene surveys would include sampling for asbestos exposure. The surveys include a wide range of chemicals and included other issues such as "noise".

INTERROGATORY NO. 14:

Please state each time any regulatory agency or other governing body has inspected the Defendant's Premises to determine if health and safety regulations governing exposure to asbestos were being followed. Include in your response the date and results of each inspection, and state whether a written report was generated.

RESPONSE: See General Objections. Additionally, the terms "regulatory agency" and "governing body" are vague, misleading and unduly burdensome.

REQUEST FOR ADMISSION NO. 13:

Admit that you did not erect containment barriers to prevent emission of asbestos dust at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 16:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 14:

Admit that you did not utilize engineering controls such as isolation or enclosure at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 17:

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If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 15:

Admit that you did not utilize ventilation or exhaust systems to divert dust at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 18:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 16:

Admit that you did not utilize dust collection engineering controls to trap airborne asbestos dust at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 19:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 17:

Admit that you did not require your employees to handle, mix, apply, remove, cut or score asbestos-containing products in a wet state to prevent emission of airborne asbestos fibers at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

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REQUEST FOR PRODUCTION NO. 20:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 18:

Admit that you did not evacuate the premises prior to the utilization of asbestos-containing materials at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 21:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

INTERROGATORY NO. 15:

Have you ever warned workers on Defendant's Premises of the hazards of asbestos and asbestos-containing products? If so, describe in detail the methods of such warnings, who you warned and when. Please include in your response a description of any written warnings relating to the hazards of asbestos in place at Defendant's Premises and state when the written warnings were installed, how many were installed, and whether they have been removed.

RESPONSE: See General Objections. No defendant's premises as defined exists.

INTERROGATORY NO. 16:

Have you ever had a policy requiring workers on Defendant's Premises to use respirators? If so, please:

a. state when this policy was implemented;
b. describe this policy in detail;
c. state to whom it applied (i.e. Defendant employees and contractor employees); and
d. describe what types and brand names of respirators were required by you.

RESPONSE: See General Objections. No defendant's premises as defined exists.

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REQUEST FOR ADMISSION NO. 19:

Admit that you did not post warning, caution or hazard signs prior to the utilization of asbestos-containing materials by your employees at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 22:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 20:

Admit that you did not issue any warnings to others at the work-sites where your employees were using asbestos-containing materials, including the work-sites where Plaintiff was present.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 23:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 24:

Produce all documents reflecting payments made to contractors during the years at issue, including Plaintiff's employer, including but not limited to invoices, bills, check requests, requisitions, canceled checks, or other documents of a similar nature reflecting payment for services rendered by Plaintiff's employer.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 21:

Admit that the use of asbestos-containing materials on Defendant's Premises created a substantial risk of injury.

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RESPONSE: Denied. See General Objections. Additionally, it is impossible to formulate a correct response to this admission as it fails to specify the circumstances of use, exposure, type of asbestos and other facts necessary to the evaluation of a response.

REQUEST FOR ADMISSION NO. 22:

Admit that during the years at issue Defendant had to power to control Defendant's Premises.

RESPONSE: Denied. See General Objections. Plaintiffs' Request for Admissions seeks to suggest that answering defendant had the right to directly control plaintiff's actions. Plaintiff was not an employee of answering defendant, nor is there any indicator he was on a premises of defendant.

REQUEST FOR PRODUCTION NO. 25:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 23:

Admit that, during the years at issue, Defendant had the power to manage the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 26:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 24:

Admit that, during the years at issue, Defendant had the power to direct the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

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REQUEST FOR PRODUCTION NO. 27:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 25:

Admit that, during the years at issue, Defendant had the power to superintend the use or conditions of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 28:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 26:

Admit that, during the years at issue, Defendant had the power to restrict the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 29:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 27:

Admit that, during the years at issue, Defendant had the power to regulate the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 30:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

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RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 28:

Admit that, during the years at issue, Defendant had the power to govern the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 31:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 29:

Admit that, during the years at issue, Defendant had the power to oversee the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 32:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 30:

Admit that, during the years at issue, Defendant had the power to administer the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 33:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

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REQUEST FOR ADMISSION NO. 31:

Admit that during the years at issue Defendant controlled Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 34:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 32:

Admit that, during the years at issue, Defendant managed the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 35:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 33:

Admit that, during the years at issue, Defendant directed the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 36:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 34:

Admit that, during the years at issue, Defendant superintended the use or conditions of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

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REQUEST FOR PRODUCTION NO. 37:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 35:

Admit that, during the years at issue, Defendant restricted the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 38:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 36:

Admit that, during the years at issue, Defendant regulated the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 39:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 37:

Admit that, during the years at issue, Defendant governed the use or conditions of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

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REQUEST FOR PRODUCTION NO. 40:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 38:

Admit that, during the years at issue, Defendant oversaw the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 41:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 39:

Admit that, during the years at issue, Defendant administered the use or condition of Defendant's Premises.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 42:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 40:

Admit that Defendant retained some control over the manner in which Plaintiff's work was performed.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 43:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

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RESPONSE: See General Objections.

INTERROGATORY NO. 17:

Do you contend that at no time during the time frame during the years at issue, Defendant did not have the right to advise or, if necessary, control the activities of employees of contractors, working on Defendant's premises, who were engaged in activities which could be potentially hazardous to either themselves or to the employees of Defendant? If the answer is anything other than "no", identify each and every fact, which supports this contention.

ANSWER: See General Objections. Specifically, defendant objects to this Interrogatory as it is vague, overbroad and burdensome and uses a double negative which renders the interrogatory incomprehensible and incapable of response.

REQUEST FOR ADMISSION NO. 41:

Admit that Defendant retained some control over the manner in which Plaintiff's employer performed the work requested by the Defendant.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 44:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 42:

Admit that Plaintiff was not entirely free to do the work on Defendant's Premises in his own way.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 45:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections This request for production is also objected to as vague, overbroad and unduly burdensome.

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REQUEST FOR ADMISSION NO. 43:

Admit that Plaintiff's employer was not entirely free to do the work requested by Defendant on Defendant's Premises in its own way.

RESPONSE: Denied. See Response to Request for Admission No. 22.

REQUEST FOR PRODUCTION NO. 46:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 44:

Admit that asbestos-containing gaskets were installed at Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 47:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 45:

Admit that asbestos-containing pipe covering was installed at Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 48:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 46:

Admit that asbestos-containing boilers were installed at Defendant's Premises.

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RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 49:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 47:

Admit that asbestos-containing fireproofing was installed at Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 50:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 48:

Admit that asbestos-containing joint compound was installed at Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 51:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 49:

Admit that asbestos-containing insulation was installed at Defendant's Premises.

RESPONSE: Denied. See General Objections.

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REQUEST FOR PRODUCTION NO. 52:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 50:

Admit that such installation was done under your direction, supervision, and/or control.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 53:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial, including but not limited to all documents identifying the entities or individuals who directed, supervised, and/or controlled such installation activities.

RESPONSE: See General Objections.

INTERROGATORY NO. 18:

Please state the first year you learned that persons could suffer physical injury through the inhalation of asbestos fibers and how Defendant became aware of the existence of asbestos hazards.

ANSWER: See General Objections. Amoco objects to this Interrogatory as it is vague, overbroad and burdensome. Additionally, It is impossible to formulate an answer to this Interrogatory, as it fails to specify the circumstances of exposure, type of asbestos and other factors. Individuals in the Industrial Hygiene, Medical and Safety Department of Amoco were aware that under certain circumstances not believed present in the petrochemical industry, exposure to very substantial quantities of asbestos over long periods of time could, in some individuals, cause asbestosis. In the mid 1960's, an awareness grew that under certain circumstances, individuals exposed to asbestos containing products with underlying asbestosis had increased incidences of lung cancer. The awareness grew from Dr. Selikoff's publications. As late as 1968, Dr. Selikoff stated "our findings suggested but did not prove that exposure to asbestos dust may lead to lung cancer." Amoco was aware of Dr. Selikoff's work and monitored his progress. Dr. Spies of Amoco's medical department, attended Dr. Selikoff's 1964 presentation at the Academy of Science.

At some time during the mid to late 1960's, this defendant became aware of an alleged connection between certain types of asbestos and mesothelioma under certain circumstances.

It is denied that exposure to asbestos causes any other disease.

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REQUEST FOR PRODUCTION NO. 54:

Produce all documents that indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 51:

Admit that you supervised the health and safety procedures implemented by contractors working on Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR ADMISSION NO. 52:

Admit that you supervised the health and safety practices implemented by Plaintiff's employer.

RESPONSE: Denied. See General Objections.

REQUEST FOR ADMISSION NO. 53:

Admit that you did not protect the Plaintiff from exposure to asbestos on Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 55:

Produce all documents supporting the legal theories and factual bases of your defenses set forth in your response to Plaintiff's Request for Disclosure under Texas Rules of Civil Procedure 194.2, subparagraph (c).

RESPONSE: See General Objections. Defendant had no premises at Pasadena, Texas and therefore plaintiff had no exposure at it. Further, this request states a factual and legal conclusion, which is the sole jurisdiction of the jury to determine.

INTERROGATORY NO. 19:

Do you contend that Plaintiff's exposure to asbestos at Defendant's Premises was not a substantial contributing factor in causing his asbestos-related injury? If the answer is anything other than "no", identify each and every fact which supports this contention.

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RESPONSE: See General Objections. This Interrogatory states a factual and legal conclusion, which is the sole jurisdiction of the jury to determine.

REQUEST FOR ADMISSION NO. 54:

Admit that Plaintiff's exposure to asbestos at Defendant's Premises was a substantial contributing factor in causing his asbestos-related injury.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 56:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 55:

Admit that Defendant did not exercise reasonable care to reduce or eliminate the risk of asbestos-related injury.

RESPONSE: Denied. See General Objections.

REQUEST FOR ADMISSION NO. 56:

Admit that Defendant did not reduce or eliminate the unreasonable risk of harm posed by the use of asbestos-containing products at Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR PRODUCTION NO. 57:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR ADMISSION NO. 57:

Admit that Defendant's failure to reduce or eliminate the risk of harm to Plaintiff was a substantial factor in bringing about Plaintiff's asbestos-related injury.

RESPONSE: Denied. See General Objections

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REQUEST FOR PRODUCTION NO. 58:

If you deny the foregoing request, in whole or in part, produce all documents supporting your denial.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 59:

If you contend that while at the premises on which you or your employees were working with asbestos-containing materials, Plaintiff was not exposed to sufficient quantities of asbestos dust to produce the disease(s) complained or, produce all documents supporting your contention.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 60:

If you contend that Plaintiff is suffering from an asbestos disease as a result of exposures other than asbestos dust at the premises on which you or your employees were working with asbestos-containing materials, produce all documents supporting your contention.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 61:

If you contend that Plaintiff does not suffer from the asbestos-related disease(s) complained of, produce all documents supporting your contention.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 62:

If you contend that Plaintiff was not exposed to asbestos dust at the premises on which you or your employees were working with asbestos-containing materials, produce all documents supporting your contention.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 63:

Produce all documents used, referred to or relied upon in answering any Interrogatories.

RESPONSE: See General Objections.

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REQUEST FOR PRODUCTION NO. 64:

Produce any and all documents and other tangible things which refer to the document retention (and/or destruction) policy of Defendant, including the following:

a. Any document retention and/or destruction policies for Defendant that pertain to documents and records, including but not limited to supplements, addenda, memoranda, operating bulletins, revisions, or any other superseding instructions that referred to the stopping, suspending or resuming of such retention or destruction policies.

b. Any record retention and/or destruction, dumping or purging policies for Defendant that pertain to documents and records created, maintained or stored by electronic and/or magnetic means, including but not limited to records that have been microfilmed, microfiched, imaged, scanned, or stored on tapes, disks, diskettes, CD-rom, databases, etc. or on or within any computer hardware, backup system, download system, file dumping or other system of information management, whether on-site or off-site, including but not limited to supplements, addenda, memoranda, operating bulletins, revisions, or any other superseding instructions that referred to the stopping, suspending or resuming of such retention or destruction policies.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 65:

Produce any and all documents, including but not limited to lists, inventories, indices, databases or print-outs thereof, archives, storage inventories, logs, or other search aids that refer or relate to the existence, extent, type, organization, filing system, method of access or retrieval, and/or location of Defendant's documents (maintained or stored on-site or off-site) described in the preceding paragraphs.

RESPONSE: See General Objections.

INTERROGATORY NO. 20:

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, identify the individuals who received, maintained, reviewed, or disseminated the information contained in such written materials.

ANSWER: See General Objections.

REQUEST FOR PRODUCTION NO. 66:

Produce the written materials referred to in the Interrogatory above.

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RESPONSE: See General Objections and Answer to Interrogatory No. 20.

REQUEST FOR ADMISSION NO. 58:

Admit that Plaintiff filed suit against Defendant within two (2) years of the date of discovering his asbestos-related condition or the existence of any asbestos-related causes of action.

RESPONSE: Denied because Defendant is unable to admit or deny this request at this time.

REQUEST FOR ADMISSION NO. 59:

Admit that Defendant is liable for Plaintiff's asbestos related illness.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 60:

Admit that asbestos is still in use and/or in place on Defendant's Premises.

RESPONSE: Denied. See General Objections.

REQUEST FOR ADMISSION NO. 61:

Admit that Defendant no longer uses asbestos on its Premises.

RESPONSE: Denied because this Request for Admission is incapable of being denied or admitted as there was no "Defendants Premises:.

REQUEST FOR PRODUCTION NO. 67:

Produce all documents that reflect, indicate or in any way relate to communications between you and any manufacturer of asbestos-containing products concerning or related to the asbestos contained in such products.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 68:

Produce all documents disseminated or published by any trade association that contain information relating to the hazards of asbestos and all documents which refer to such documents.

RESPONSE: See General Objections.

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REQUEST FOR PRODUCTION NO. 69:

Produce all documents, that relate to any inspections by any regulatory agency for the purpose of ascertaining whether health or safety regulations were being followed or adhered to at any of your plants. This request specifically seeks any and all such documentation referring to dust hazards, including but not limited to asbestos in your plants.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 70:

Produce all safety meeting minutes or other documents that refer to the dangers of asbestos safety measures to be used in the vicinity of asbestos at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 71:

Produce all contracts, or other documents that relate to abatement of asbestos at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 72:

Produce all contracts, or other documents that relate to the installation of asbestos products at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 73:

Produce all documents that in any way reflect a removal plan or organized written criteria or schedule for the removal of asbestos at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 74:

Produce all documents related to the medical condition of Robert Henry Villarreal at any time during his employment at Defendant's Premises. This request specifically includes any and all x-rays, x-ray reports, medical notes and/or medical records of any kind, annual physical forms, and employment records relating to Plaintiff's health.

RESPONSE: See General Objections. Defendant did not have a premises in Pasadena, Texas.

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REQUEST FOR PRODUCTION NO. 75:

Produce Plaintiff's entire personnel file from Defendant's Premises.

RESPONSE: See General Objections. Neither defendant nor Amoco Oil had a premises in Pasadena, Texas. Nor is there any indicator that plaintiff was employed by defendant or Amoco Oil.

REQUEST FOR PRODUCTION NO. 76:

Produce all documents that reflect the layout of Defendant's Premises, including the location and dimensions of all buildings and the location and placement of asbestos-containing products.

RESPONSE: See General Objections. Neither defendant nor Amoco Oil had a premises in Pasadena, Texas.

REQUEST FOR PRODUCTION NO. 77:

Produce all documents containing any warnings concerning the possibility of injury resulting from the use of asbestos-containing products or exposure to asbestos.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 78:

Produce all photographs of asbestos products in place or asbestos-containing products being fabricated or utilized at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 79:

Produce all photographs of warning signs or warning statements which are or have been in place at Defendant's Premises in the vicinity of asbestos-containing products.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 80:

Produce all documents relating to any individuals claimed injury as a result of exposure to asbestos at Defendant's Premises, including but not limited to, workers compensation claims.

RESPONSE: See General Objections.

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REQUEST FOR PRODUCTION NO. 81:

Produce all documents, including but not limited to, corporate minutes, which mention the hazards or potential hazards of asbestos.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 82:

Produce all documents, including invoices, shipping receipts, bills of lading and purchase orders, related to the purchase of asbestos-containing products for use at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 83:

Produce all documents relating to inspections by labor inspectors, insurance company inspectors or anyone from your company or hired by your company, that included the taking or measuring of "dust counts".

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 84:

In the event that Defendant performed or had performed any dust level counts or measurements of any of its plants or industrial facilities with respect to asbestos dust, produce any documents, memoranda, or other writings that in any way reflect the results of such studies or counts and actions taken as a result of such counts or studies.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 85:

Produce all reports, writings (whether published or unpublished) and/or other documentation written, created and/or edited by any of your experts that in any way pertain to asbestos and the hazards and/or diseases that may result therefrom.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 86:

Produce all documents which will be used that the time of trial, including all potential exhibits and those documents which may be used to cross-examine other witnesses or in rebuttal, and which you contend are relevant to any of Defendant's enumerated defenses in Defendant's most recently filed Answer.

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RESPONSE: See General Objections. Without waiving these objections, Amoco has not determined what documents it may use at time of trial. Potential documents have been produced. Additional documents may be provided upon provision of further information.

REQUEST FOR PRODUCTION NO. 87:

Produce documents between Defendant and any of its worker's compensation carriers regarding the hazards of asbestos and asbestos-containing products.

RESPONSE: See General Objections. Additionally, this Request for Production is vague, overbroad, ambiguous and unduly burdensome.

REQUEST FOR PRODUCTION NO. 88:

Produce a copy of all regulations, orders, rules and/or policies which have been used relating to the safety of the Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 89:

Produce all documents which contain complaints by employees of the Defendant's Premises regarding safety conditions and work place conditions at the Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 90:

Produce all documents which contain complaints by Union representatives of Defendant's Premises regarding safety conditions and work place conditions at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 91:

Produce all documents, organizational charts or rosters which identify the members of the management at the Defendant's Premises and their areas of responsibility during the time period of Plaintiff's work at Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 92:

Produce all documents which evidence Defendant's net worth, including but not limited to all "10-K" forms filed for the last five (5) years.

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RESPONSE: Objection as these documents are publicly available.

REQUEST FOR PRODUCTION NO. 93:

Produce all documents which evidence Defendant's purchase, acquisition, sale or transfer of ownership of Defendant's Premises.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 94:

Produce all indemnity agreements, assignments of liability, subrogation agreements and other similar documents relating to Defendant's Premises and liabilities arising from said ownership.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 95:

Produce all contracts pertaining to work done by contractors at Defendant's facility.

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 96:

Please produce any printed material produced or published by Defendant containing any warnings concerning the possibility of injury resulting form the use of asbestos-containing products or exposure to asbestos?

RESPONSE: See General Objections.

REQUEST FOR PRODUCTION NO. 97:

Produce all documents and other tangible things relating to the Plaintiff.

RESPONSE: Defendant objects to this request as being vague and unduly burdensome. Defendant will produce copies of Plaintiff's medical records at the office of Andrews & Kurth L.L.P., 600 Travis, Suite 4200, Houston, Texas 77002 at a mutually agreeable date and time.

REQUEST FOR PRODUCTION NO. 98:

If you contend that you did not own or control the facility(ies) during any time period that Plaintiff worked (or believes he worked) at the facility(ies), please produce all documentation that supports your contention, including but not limited to documentation pertaining to the purchase, sale, acquisition, merger or divestment of corporations, subsidiaries, divisions, or other corporate entities or assets that included the purchase, sale, acquisition, merger, or divestment of the facility(ies); such documentation to include, by way of example and not limitation, purchase

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or sale agreements, minutes, resolutions, annual reports, 10K reports or other state or federal agency filings, or deposition, trial testimony or affidavits of your corporate representatives who are the most knowledgeable individuals with respect to such matter.

RESPONSE: See General Objections. Additionally, answering defendant objects to this request as it requires it to prove a negative.

Respectfully submitted,

ANDREWS & KURTH L.L.P.

By: _____

Thomas W. Taylor
State Bar No. 19723875
Alexis J. Gómez
State Bar No. 00790769
4200 Chase Tower, 600 Travis St.
Houston, Texas 77002
Telephone: (713) 220-3991
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ATTORNEYS FOR DEFENDANT
AMOCO CORPORATION

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of Defendant Amoco Corporation's Answers to Plaintiff Robert Henry Villarreal's First Set Of Interrogatories, First Request For Production and First Request For Admissions was forwarded to counsel for plaintiffs' via certified mail, return receipt requested and to all other known counsel of record via regular U.S. Mail on this 9th day of March 2001.

_____
Alexis J. Gómez

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March 9, 2001

VIA CM/RRR

Ms. Stephanie Finch
Ms. Jennyfer B. Gray
Baron & Budd
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281

Re: Cause No. 2000-05-1962-C; *Robert Henry Villarreal, et al. v. Owens Corning, Fiberglas Corporation, et al.*; In the 197th District Court of Cameron County, Texas

Dear Counsel:

Enclosed, please find Amoco Corporation **DEFENDANTS' ANSWERS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR PRODUCTION, FIRST REQUEST FOR ADMISSION** and **REQUEST FOR DISCLOSURE** in the above-referenced cause of action.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Tiffani E. Johnson
Legal Assistant to Alexis J. Gomez

cc: All known counsels of record *(w/o enclosures)*

HOU:617369.1

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March 9, 2001

VIA CM/RRR
Ms. Aurora de la Garza, District Clerk
Cameron County Courthouse
974 East Harrison
Brownsville, TX 78520

Re: Cause No. 2000-05-1962-C; *Robert Henry Villarreal, et al. v. Owens Corning, Fiberglas Corporation, et al.*; In the 197th District Court of Cameron County, Texas

Dear Ms. De La Garza:

Enclosed, please find Amoco Corporation **CERTIFICATE OF WRITTEN DISCOVERY**, in the above-referenced cause of action.

Please date stamp and return the enclosed copy. A self-addressed stamped envelope has been provided. Thank you for your attention to this matter.

Very truly yours,

Tiffani E. Johnson
Legal Assistant to Alexis J. Gomez

Enclosures

cc: Stephanie Finch & Jennyfer Gray - Baron & Budd
All known counsels of record *{w/o enclosures)*

HOU:617368 1

No. 2000-05-1962-C

ROBERT HENRY VILLARREAL, Individually and As Personal Representative of the Heirs and Estate of JOHN HENRY VILLARREAL,	§	IN THE DISTRICT COURT
Plaintiff,	§	
vs.	§	CAMERON COUNTY, TX
GAF CORPORATION, et al.,	§	
Defendants.	§	197th JUDICIAL DISTRICT

CERTIFICATE OF WRITTEN DISCOVERY

Pursuant to Texas Rules of Civil Procedure, the undersigned hereby certifies that a true and correct copy of Amoco Corporation's Answers To Plaintiff Robert Henry Villareal's First Set Of Interrogatories, First Request For Production And First Request For Admissions and Response To Plaintiffs' Request For Disclosure were served upon Plaintiffs' counsel on this the 9th day of March, 2001.

Respectfully submitted,

ANDREWS & KURTH L.L.P.

By: _____

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ATTORNEYS FOR DEFENDANT
AMOCO CORPORATION

HOU:617336.1

Certificate of Service

This is to certify that a true and correct copy of Defendant Amoco Corporation Certificate of Written Discovery was forwarded to counsel for plaintiffs' via certified mail, return receipt requested and to all other known counsel of record via regular U.S. Mail on this 9th day of March 2001.

Alexis J. Gómez

HOU:617360.1