

CAUSE NO.A-980030-C

JOE K. SHORT, JR.	§	IN THE DISTRICT COURT OF
	§	
VS.	§	ORANGE COUNTY, TEXAS
	§	
A.C. & S., ET AL	§	128TH JUDICIAL DISTRICT

DEFENDANT, ATOFINA PETROCHEMICALS, INC.'S
CERTIFICATE OF WRITTEN DISCOVERY

ATOFINA Petrochemicals, Inc., a defendant in this matter, files this Certificate of Written Discovery and certifies that the following was sent to Plaintiff's counsel via certified mail, return receipt requested, on March 8, 2001:

Defendant, ATOFINA Petrochemicals, Inc.'s Interrogatories, First Requests for Production, and First Request for Admissions.

Respectfully submitted,

JENKINS & MARTIN, L.L.P.

KIRK E. MARTIN
STATE BAR NO. 13090600
P. O. BOX 26008
BEAUMONT, TEXAS 77720-6008
(409) 832-4100 TELEPHONE
(409) 832-4242 TELECOPIER

ATTORNEY FOR DEFENDANT,
ATOFINA PETROCHEMICALS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to Plaintiffs' counsel by certified mail, return receipt requested and to all other counsel of record by regular U.S. mail, on this 8th day of March, 2001.

KIRK E. MARTIN

P:\word\fina\680-371\Discovery\Notice of Written Discovery

JENKINS & MARTIN, L.L.P.

GAIL C. JENKINS, P.C.
BOARD CERTIFIED
PERSONAL INJURY & CIVIL TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION
KIRK E. MARTIN
LOUIS H. KNABESCHUH, JR.
CLAUDE R. LeMASTERS

ATTORNEYS AT LAW
P.O. BOX 26006
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STREET ADDRESS:
3615 CALDER, SUITE 500
BEAUMONT, TEXAS 77702

March 12, 2001

In Re: Cause No. A-980030-C; *Joe K. Short, Jr. v. A.C.&S., et al*; In The 128th Judicial District Court of Orange County, Texas; Our File No. 680.371

Ms. Holly J. Huart
Ms. Stephanie Finch
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, Texas 75219

CERTIFIED MAIL, RRR
7000 0520 0024 1951 3667

Dear Holly and Stephanie:

Enclosed please find the Affidavit of Pat Avery-King, which should be attached to ATOFINA Petrochemicals, Inc.'s Responses to Plaintiff's Interrogatories, First Request for Production and First Request for Admissions which were filed on March 8, 2001.

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

Very truly yours,

KIRK E. MARTIN

KEM:srr
Enclosures

c: Mr. Don Carona (w/o enclosure)
All Known Counsel of Record (w/o enclosure)

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AFFIDAVIT

STATE OF TEXAS §
§
COUNTY OF JEFFERSON §

BEFORE ME, the undersigned authority, a Notary Public in and for said State and County, personally appeared PAT AVERY-KING, who being duly sworn deposes and says that she is over the age of twenty-one (21) years of age, and that she is not disqualified for any reason from making this affidavit, and that she is Administrative Manager for ATOFINA Petrochemicals, Inc. Port Arthur refinery, and is authorized to make this Affidavit. She further states that because of the number of years and issues involved, that no one person has, or could have, personal knowledge of all the matters set out in this discovery request, that the responses set forth have been compiled with the advice and assistance of counsel, that she has read the above answers to interrogatories and that the responses are true and correct."

Pat Avery King
PAT AVERY-KING

SWORN TO AND SUBSCRIBED BEFORE ME on this 9th day of March, 2001, to certify which witness my hand and seal of office.

MARTHA J KILE
NOTARY PUBLIC
STATE OF TEXAS
My Commission Expires 10-05-2002

Martha J. Kile
NOTARY PUBLIC IN AND FOR
THE STATE OF Texas

Print Name: Martha J. Kile

MY COMMISSION EXPIRES:
10/5/02

JENKINS & MARTIN, L.L.P.

GAIL C. JENKINS, P.C.
BOARD CERTIFIED
PERSONAL INJURY & CIVIL TRIAL LAW
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March 12, 2001

In Re: Cause No. A-980030-C; *Joe K. Short, Jr. v. A.C.&S., et al*; In The 128th Judicial District Court of Orange County, Texas; Our File No. 680.371

Ms. Vickie Edgerly
District Clerk
Orange County
P.O. Box 427
Orange, TX 77630

Dear Ms. Edgerly:

Enclosed please find Defendant, ATOFINA Petrochemicals, Inc.'s Notice of Written Discovery in the above-referenced matter.

Please stamp your filing date on the enclosed copy of this letter and return to my attention in the enclosed, self-addressed and stamped envelope. By copy of this letter, this document has been forwarded to all known counsel of record. Thank you for your assistance in this regard.

Very truly yours,

KIRK E. MARTIN

KEM:srr
Enclosure

cc: Ms. Holly J. W. Huart/Ms. Stephanie Finch
J. Donald Carona, Jr.
All Other Known Counsel of Record

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