PLAINTIFF'S EXHIBIT
UC-2037

CAUSE NO. CC-99-08033-B

| | | |
|---|---|---|
| MALCOM LEE MURPHY, JR., ET AL. | § | IN THE COUNTY COURT |
| | § | |
| VS. | § | AT LAW NO. 2 |
| | § | |
| OWENS-CORNING, ET AL. | § | DALLAS COUNTY, TEXAS |

**DEFENDANT UNION CARBIDE CORPORATION'S RESPONSES TO PLAINTIFFS' REQUEST FOR DISCLOSURE**

TO: Plaintiffs, by and through their attorney of record, D. Leann Jackson, Baron & Budd, 3102 Oak Lawn, Dallas, Texas 75219-4281.

Comes now, Defendant Union Carbide Corporation, by its undersigned counsel, and makes and serves this its Responses to Plaintiff's Request for Disclosure.

Respectfully submitted,

DEHAY & ELLISTON, L.L.P.
3500 Bank of America Plaza
901 Main Street
Dallas, Texas 75202
(214) 210-2400/~~210-2~~500 (fax)

By: _____
Gary D. Elliston
State Bar No. 06584700
Paul E. Hamilton
State Bar No. 008838800

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been duly forwarded to counsel for Plaintiffs via certified mail, return-receipt-requested, this the 4th of May, 2001.

Paul E. Hamilton

## RESPONSES TO REQUEST FOR DISCLOSURE

**194.2(a) The correct names of the parties to the lawsuit**

Defendant is unable to determine whether every party named in this action was sued under the correct name. However, Responding Defendant does not contend that it has been incorrectly named in the petition.

**194.2(b) The name, address, and telephone number of any potential parties**

Defendant does not know the identity of other potential parties at this time. Discovery is ongoing.

**194.2(c) The legal theories and, in general, the factual bases of the responding party's defenses.**

Defendant has not had sufficient discovery in this matter to address the specifics of other defenses, however, Defendant reserves the right to submit proof that any Plaintiff learned of his alleged disease more than two (2) years before filing suit, that any Plaintiff misused the products or failed to take proper precautions when using the products, that Plaintiff's habit of smoking cigarettes caused or contributed to his claimed asbestos-related disease. Defendant further reserves the right to present evidence pertaining to all other defenses raised by their Answers as discovery in this action is ongoing.

Defendant will also show that Plaintiff either, did not sustain the injuries alleged, that any injuries sustained were the result of smoking cigarettes, or that the injuries sustained were caused by exposure to products of defendants other than this Defendant, or on premises other than those owned or operated by this Defendant.

**194.2(d) The amount and any method of calculating economic damages**

Defendant has not yet received sufficient discovery from Plaintiffs to permit it to

respond to this request. Any report obtained from an expert economist will be provided in accordance with the Texas Rules of Civil Procedure.

**194.2(e) The name, address and telephone number of persons having knowledge of relevant facts**

Defendant has not yet received sufficient discovery from Plaintiffs regarding their alleged exposures to asbestos-containing products to permit them to respond fully to this request. Among those persons with potential knowledge of relevant facts would be Donald Deese, former Industrial Hygienist at the Texas City facility, and Jim Rapp, former maintenance superintendent. A list of other persons who may have knowledge of relevant facts is attached.

**194.2(f) Information pertaining to testifying experts**

Defendant has not yet received sufficient discovery from Plaintiffs regarding their alleged exposures to asbestos-containing products to permit them to respond fully to this request. A list of expert witnesses who may be called to testify is attached. Any further information will be submitted in accordance with Rule 195.2.

**194.2(g) Any discoverable indemnity and insuring agreements**

Defendant has sufficient insurance to cover any settlement or verdict in this case.

**194.2(h) Any discoverable settlement agreements**

None.

**194.2(i) Any discoverable witness statements**

None, other than statements contained in medical records produced in this case or depositions taken in this action.

**194.2(j), (k) All medical records or bills obtained by authorization**

Any records obtained by use of authorization will be provided.

# EXHIBIT "1"


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# UNION CARBIDE POTENTIAL
# FACT/EXPERT WITNESSES AND DEPOSITION TESTIMONY

Carlos Martino, Research Scientist - employed by Union Carbide at Bound Brook, New Jersey.

Douglas Neal, retired Industrial Hygienist - formerly employed at Union Carbide In Bound Brook, New Jersey.

Mr. Martino and Mr. Neal are familiar with the Bakelite resin manufacturing process and can testify as to why the resin could not emit or let loose asbestos fiber.

Don Gould, former Chair, Union Carbide's Labeling Committee - employed by Union Carbide, Bound Brook, New Jersey.

Mr. Gould can testify about considerations and processes that went into the labels used on the Bakelite resin product.

Dr. Hilton Lewinson (MD)
Hartford, CT

Dr. Ed Ilgren, (Mineralogist)
Bryn Mawyr, PA

Dr. Mark Van Baalen (Mineralogist)
Harvard University
Cambridge, MA

Dr. Allen Gibbs
Pathology Department
Landough Hospital
Penarth, Glamorgan
UK CFC I XX

Professor Fred Pooley (Mineralogist)
School of Engineering
Dept. of Mining & Minerals
University of Wales
P. O. Box 917
Cardiff, Wales CF21XH

John L. Myers

# EXHIBIT "2"


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DEFENDANTS' LIST OF POTENTIAL
DEPOSITION AND TRIAL TESTIMONY

1. Edwin Aduddell, by trial testimony in Edwin Aduddell v. Armstrong World Industries, Inc., et al. -- Civil Action No. CA3-85-1207-H, in the U.S. District Court for the Northern District of Texas, Dallas Division.

2. Edwin Aduddell, by deposition testimony of in Edwin Aduddell v. Armstrong World Industries, Inc., et al., Civil Action No. CA3-85-1207-H, in the United States District Court for the Northern District of Texas, Dallas Division, taken on January 6, 1987.

3. Dr. Steven Ayres, by trial testimony in Loyd Galveston 92, Civil Action No. G-82-144, in the U.S. District Court for the Southern District of Texas, Galveston Division.

4. Dr. Steven Ayres, by trial testimony in William J. Kornegay v. Johns-Manville Sales Corporation, et al., Civil Action No. G-81-131 (consolidated) in the U.S. District Court for the Southern District of Texas, Galveston Division.

5. Dr. Harry Demopolous, by trial testimony in Clarence Wilson v. Johns-Manville Sales Corp., et al., No. G-81-128-CA.

6. E. W. Hines, by trial testimony in Charlie Hatley Newman, et ux v. Raymark Industries, Inc., et al., Civil Action No. M-79-124-CA; given in the U.S. District Court for the Eastern District of Texas, Marshall Division.

7. Dr. H. Corwin Hinshaw, by deposition testimony in William L. Nicar v. Johns-Manville Sales Corp., et al., No. W-81-CA-8.

8. Dr. H. Corwin Hinshaw, by deposition testimony in In Re: Related Asbestos Cases, No. C-83-6251-RFP, in the United States District Court for the Northern District of California; In Re: Related Shipyard and Applicator Cases: Alameda County Asbestos Litigation, in the Superior Court of the State of California, in and for the County of Alameda; Misc. No. 959, In Re: Shipyard and Applicator Cases (Clapper & Brayton) Consolidated for Discovery, in the Superior Court of the State of California, in and for the County of Solano; and In Re: San Francisco Asbestos Complex Litigation, in the Superior Court of the State of California, in and for the City and County of San Francisco.

9. Dr. H. Corwin Hinshaw, by videotape deposition testimony in Antonio Mendoza v. Fibreboard Corporation, et al., No. CA2-80-006.

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10. Dr. Jerome Kleinerman, by videotape deposition in Shirley Tate v. Minnesota Mining & Manufacturing Corporation (3M Corp., et al.) in the District Court of Nueces County, Texas, 94 Judicial District on May 18, 1989.

11. Cross-examination of Dr. W.T.E. McCaughey by video deposition in Selma Ruth Martin v. Owens Corning Fiberglas Corporation, et al., No. TY-87-125-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division.

12. Dr. Hans Weill, by deposition testimony in Ernest Howell v. Armstrong World Industries, Inc., et al., No. M-80-169-CA.

13. Dr. Thomas M. Wheeler, by videotape deposition testimony in Charles L. Vance v. The Dexter Corporation, Cooper Airmotive, Inc., and Aviall, Inc. v. Union Carbide, No. 85-12339-J in the District Court of Dallas County, Texas, 191st Judicial District taken on August 31, 1988.

14. Dr. Thomas M. Wheeler, by videotape deposition testimony in Charles Vance, et al. v. The Dexter Corporation, et al., Cause No. 85-12339-J in the District Court of Dallas County, Texas, 191st Judicial District taken on August 31, 1988.

15. Any prior deposition or trial testimony of any witness called by any other party, either live or by deposition.

16. Any prior deposition or trial testimony of any physician who has treated, examined, or been consulted regarding the Plaintiff.

17. Any prior deposition or trial testimony of any Plaintiff represented by Plaintiff's attorney herein.

18. Any deposition or custodian of records concerning the Plaintiff.

19. Any deposition taken by any party in this case.

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# DEFENDANT'S LINE AND PAGE DESIGNATIONS

## DEFENDANTS

Deposition testimony of Dr. Elvin E. Adams, in Robert Solomon v. Armstrong, Inc., No. TY-84-39-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

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| 8 | 17 | | 11 | 11 |
| 11 | 14 | | 12 | 5 |
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| 15 | 5 | | 17 | 15 |
| 17 | 16 | | 18 | 7 |
| 18 | 8 | | 27 | 12 |
| 28 | 9 | | 44 | 13 |
| 54 | 14 | | 55 | 15 |
| 56 | 12 | | 58 | 23 |
| 59 | 15 | | 60 | 11 |
| 61 | 9 | | 63 | 17 |
| 64 | 9 | | 66 | 1 |
| 67 | 10 | | 67 | 25 |
| 68 | 6 | | 68 | 9 |
| 69 | 3 | | 70 | 2 |
| 71 | 13 | | 72 | 13 |
| 75 | 8 | | 76 | 1 |
| 76 | 10 | | 76 | 25 |
| 81 | 4 | | 85 | 1 |
| 86 | 21 | | 86 | 23 |
| 87 | 21 | | 88 | 4 |
| 90 | 2 | | 91 | 16 |

Videotape deposition testimony of Steven M. Ayers, M.D. in In re: Asbestos Personal Injury Cases in the following courts: Circuit Court of Baltimore City, Maryland, Circuit Court for Washington County, Maryland; Circuit Court for Prince Georges County, Maryland; Circuit Court for Cecil County, Maryland; Circuit Court for St. Mary's County, Maryland; Superior Court of Washington; District of Columbia, Civil Division; Circuit Court of Alleghany County, Maryland; United States District Court for the District of Columbia; United States District Court of Maryland; and Circuit Court for Baltimore County, Maryland BCA -1 through 4, taken on August 10 through August 12, 1989 in Baltimore, Maryland.

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| | | Volume 1 | | |
| 7 | 11 | | 7 | 13 |
| 8 | 20 | | 15 | 17 |
| 15 | 21 | | 17 | 2 |
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| 46 | 12 | | 47 | 5 |
| 47 | 10 | | 48 | 15 |
| 48 | 17 | | 48 | 18 |
| 48 | 20 | | 49 | 7 |
| 53 | 12 | | 54 | 7 |
| 54 | 9 | | 56 | 12 |
| 56 | 14 | | 56 | 16 |
| 56 | 18 | | 58 | 9 |
| 58 | 11 | | 60 | 13 |
| 60 | 15 | | 62 | 4 |
| 62 | 10 | | 62 | 11 |
| 62 | 13 | | 64 | 3 |
| 64 | 6 | | 64 | 19 |
| 64 | 21 | | 65 | 8 |
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| 66 | 6 | | 67 | 3 |
| 67 | 5 | | 67 | 19 |
| 69 | 2 | | 69 | 15 |
| 69 | 17 | | 69 | 19 |
| 69 | 21 | | 70 | 8 |
| 70 | 10 | | 71 | 1 |
| 71 | 3 | | 72 | 4 |
| 72 | 6 | | 73 | 10 |
| 73 | 13 | | 73 | 16 |
| 73 | 18 | | 74 | 9 |
| 74 | 11 | | 74 | 16 |
| 75 | 1 | | 75 | 3 |
| 75 | 5 | | 75 | 16 |
| 75 | 18 | | 77 | 13 |
| 77 | 16 | | 77 | 19 |
| 77 | 21 | | 78 | 6 |
| 78 | 7 | | 78 | 21 |
| 79 | 2 | | 80 | 12 |
| 80 | 14 | | 81 | 19 |
| 81 | 21 | | 82 | 7 |
| 82 | 9 | | 83 | 3 |
| 83 | 5 | | 83 | 18 |
| 83 | 21 | | 86 | 8 |
| 86 | 10 | | 87 | 6 |
| 87 | 8 | | 88 | 13 |
| 88 | 15 | | 88 | 20 |
| 89 | 1 | | 89 | 3 |
| 89 | 5 | | 90 | 12 |
| 90 | 15 | | 90 | 17 |
| 90 | 19 | | 92 | 7 |
| 93 | 2 | | 93 | 11 |
| 94 | 4 | | 94 | 8 |
| 94 | 10 | | 95 | 8 |
| 95 | 13 | | 95 | 15 |
| 95 | 17 | | 96 | 1 |

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| 96 | 3 | | 96 | 16 |
| 96 | 19 | | 97 | 6 |
| 97 | 9 | | 97 | 11 |
| 97 | 13 | | 97 | 17 |
| 98 | 13 | | 99 | 14 |
| 99 | 16 | | 100 | 1 |
| 100 | 3 | | 100 | 17 |
| 100 | 20 | | 101 | 1 |
| 101 | 13 | | 101 | 19 |
| 101 | 21 | | 102 | 4 |
| 102 | 6 | | 102 | 8 |
| 102 | 10 | | 102 | 14 |
| 102 | 16 | | 103 | 5 |
| 103 | 7 | | 103 | 10 |
| 103 | 13 | | 103 | 16 |
| 103 | 18 | | 104 | 6 |
| 104 | 8 | | 104 | 14 |
| 104 | 17 | | 104 | 20 |
| 105 | 1 | | 105 | 9 |
| 105 | 12 | | 105 | 21 |
| 106 | 3 | | 106 | 11 |
| 106 | 18 | | 107 | 1 |
| 107 | 3 | | 107 | 15 |
| 108 | 5 | | 109 | 3 |
| 109 | 6 | | 109 | 21 |
| 110 | 3 | | 111 | 5 |
| 111 | 8 | | 111 | 10 |
| 111 | 12 | | 112 | 2 |
| 112 | 4 | | 113 | 4 |
| 113 | 10 | | 113 | 21 |
| 114 | 16 | | 117 | 2 |
| 117 | 18 | | 118 | 18 |
| 119 | 7 | | 119 | 8 |
| 119 | 10 | | 120 | 20 |
| 121 | 4 | | 121 | 6 |
| 121 | 9 | | 122 | 11 |
| 122 | 13 | | 122 | 17 |
| 122 | 19 | | 123 | 9 |
| 123 | 12 | | 125 | 2 |
| 125 | 6 | | 125 | 18 |
| 125 | 21 | | 127 | 6 |
| 127 | 8 | | 128 | 4 |
| 128 | 7 | | 128 | 21 |
| 129 | 2 | | 129 | 12 |
| 129 | 14 | | 130 | 16 |
| 130 | 18 | | 131 | 18 |
| 131 | 20 | | 132 | 17 |
| 132 | 19 | | 136 | 13 |
| 137 | 1 | | 137 | 6 |
| 137 | 8 | | 137 | 11 |
| 137 | 13 | | | |
| 137 | 6 | | 139 | 17 |
| 139 | 19 | | 139 | 21 |
| 140 | 2 | | 140 | 10 |

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| 140 | 12 | | 140 | 14 |
| 140 | 17 | | 143 | 6 |
| 143 | 8 | | 143 | 17 |
| 144 | 8 | | 146 | 2 |
| 146 | 4 | | 146 | 6 |
| 146 | 9 | | 147 | 5 |
| 147 | 14 | | 148 | 9 |
| 148 | 12 | | 148 | 21 |
| 149 | 4 | | 150 | 3 |
| 150 | 6 | | 150 | 8 |
| 150 | 10 | | 150 | 21 |
| 151 | 4 | | 151 | 8 |
| 151 | 10 | | 151 | 15 |
| 151 | 18 | | 151 | 20 |
| 152 | 1 | | 152 | 12 |
| 152 | 14 | | 152 | 17 |
| 152 | 21 | | 153 | 3 |
| 153 | 5 | | 153 | 10 |
| 153 | 12 | | 153 | 17 |
| 153 | 19 | | 154 | 6 |
| 154 | 8 | | 154 | 12 |
| 154 | 14 | | 154 | 15 |
| 155 | 15 | | 155 | 18 |
| 155 | 20 | | 156 | 3 |
| 156 | 4 | | | |
| 156 | 6 | | 156 | 9 |
| 156 | 11 | | 156 | 13 |
| 156 | 15 | | 156 | 20 |
| 157 | 1 | | 157 | 10 |
| 157 | 12 | | 158 | 16 |
| 158 | 18 | | 159 | 6 |
| 159 | 8 | | 159 | 12 |
| 159 | 14 | | 159 | 19 |
| 159 | 21 | | 160 | 14 |
| 160 | 16 | | 160 | 17 |
| 160 | 19 | | 161 | 7 |
| 161 | 9 | | 161 | 16 |
| 161 | 18 | | 162 | 10 |
| 162 | 12 | | 162 | 13 |
| 162 | 15 | | 163 | 8 |
| 163 | 10 | | | |
| 163 | 12 | | 164 | 1 |
| 164 | 3 | | 164 | 20 |
| 165 | 1 | | 165 | 10 |
| 165 | 12 | | 165 | 18 |
| 165 | 20 | | 166 | 2 |
| 166 | 4 | | 166 | 9 |
| 166 | 11 | | | |
| 166 | 13 | | 166 | 16 |
| 166 | 18 | | | |

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Trial Testimony of Dr. James D. Crapo in Paul Cochran vs. Keene Corporation, et al., Cause No. A-931,139-C, in the 128th Judicial District Court of Orange County, Texas on February 23, 1996, as follows:

| Page | Line | through | Page | Line |
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| 744 | 21 | | 745 | 11 |
| 745 | 16 | | 745 | 18 |
| 746 | 5 | | 747 | 20 |
| 747 | 24 | | 759 | 12 |
| 759 | 17 | | 764 | 25 |
| 765 | 14 | | 766 | 14 |
| 766 | 22 | | 774 | 9 |
| 776 | 18 | | 780 | 24 |

Deposition testimony of Irby Eldridge in Mary Joyce Lose v. Johns-Manville Sales Corporation, et al. and other, Civil Action No. CV-80-002789, Circuit Court of the Thirteenth Judicial District of Alabama, Mobile County, taken on May 25, 1981 as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 17 | 20 | | 20 | 11 |
| 21 | 9 | | 21 | 19 |
| 22 | 17 | | 22 | 23 |
| 26 | 16 | | 26 | 1 |
| 26 | 13 | | 28 | 1 |
| 30 | 7 | | 30 | 20 |
| 38 | 13 | | 39 | 3 |
| 40 | 9 | | 41 | 7 |

Deposition of Dr. Milton Gray in Charles Hatley Newman v. Raymark, et al., No. M-79-124-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

| Page | Line | through | Page | Line |
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| 3 | 15 | | 3 | 17 |
| 22 | 8 | | 25 | 21 |
| 26 | 2 | | 27 | 3 |
| 27 | 11 | | 28 | 10 |
| 28 | 20 | | 29 | 17 |
| 30 | 3 | | 32 | 17 |
| 36 | 20 | | 37 | 21 |
| 46 | 11 | | 48 | 11 |
| 48 | 23 | | 48 | 25 |

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Deposition testimony of Dr. Milton Gray in Henry E. Holland, et al. v. Johns-Manville, et al., No. M-80-152-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

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| 10 | 14 | | 10 | 24 |
| 11 | 18 | | 12 | 1 |
| 12 | 11 | | 13 | 24 |
| 15 | 10 | | 15 | 13 |
| 19 | 6 | | 20 | 11 |
| 26 | 5 | | 26 | 20 |
| 26 | 24 | | 27 | 21 |
| 38 | 20 | | 38 | 25 |
| 40 | 11 | | 41 | 2 |
| 53 | 9 | | 54 | 13 |
| 58 | 15 | | 59 | 17 |
| 80 | 23 | | 81 | 20 |
| 90 | 19 | | 91 | 20 |
| 96 | 7 | | 97 | 2 |
| 171 | 25 | | 173 | 13 |

Deposition testimony of Dr. Milton Gray in Philip L. Cano, et ux v. Raymark, et al., taken on November 21, 1983, No. C-83-49-CA, in the U.S. District Court for the Southern District of Texas, Corpus Christi Division, as follows:

| Page | Line | through | Page | Line |
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| 7 | 19 | | 7 | 20 |
| 19 | 23 | | 23 | 11 |
| 25 | 2 | | 28 | 4 |
| 28 | 12 | | 28 | 17 |
| 29 | 1 | | 29 | 7 |

Deposition testimony of Dr. Milton Gray in Charlie Hatley Newman, et al. v. Johns-Manville, et al., in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

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| 3 | 16 | | 3 | 17 |
| 22 | 8 | | 25 | 21 |
| 26 | 2 | | 27 | 3 |
| 27 | 11 | | 28 | 10 |
| 28 | 20 | | 29 | 17 |
| 30 | 3 | | 32 | 17 |
| 36 | 20 | | 37 | 21 |
| 45 | 11 | | 48 | 11 |
| 48 | 23 | | 48 | 25 |

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Deposition testimony of Dr. Milton Gray in Edith Jenkins and Carl E. Jenkins v. Johns-Manville Sales Corporation, et al., Civil Action No. TY-79-61-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

| Page | Line | through | Page | Line |
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| 11 | 15 | | 14 | 5 |
| 15 | 15 | | 16 | 19 |
| 20 | 12 | | 20 | 19 |

Deposition testimony of Dr. Stanley Donald Greenberg taken in Gerrit Spruit v. The Celotex Corporation, et al., Civil Action No. CA3-85-1979-D, in the U.S. District Court for the Northern District of Texas, Dallas Divisicn, as follows:

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| 5 | 8 | | 5 | 10 |
| 6 | 2 | | 6 | 12 |
| 7 | 2 | | 7 | 7 |
| 15 | 21 | | 15 | 25 |
| 18 | 10 | | 25 | 16 |
| 25 | 25 | | 34 | 9 |
| 34 | 13 | | 34 | 22 |
| 35 | 6 | | 42 | 8 |
| 42 | 24 | | 44 | 14 |
| 46 | 3 | | 48 | 7 |
| 50 | 10 | | 50 | 23 |
| 51 | 16 | | 53 | 9 |
| 56 | 11 | | 57 | 25 |
| 58 | 12 | | 58 | 24 |
| 59 | 4 | | 59 | 21 |
| 63 | 7 | | 65 | 3 |

Deposition testimony of Andrew T. Haas in Karen L. Barsh v. Keene Corporation, et al., in the U.S. District Court for the Middle District of Florida, Jacksonville Division, taken August 22, 1980 as follows:

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| 4 | 10 | | 7 | 4 |
| 9 | 8 | | 10 | 8 |
| 17 | 7 | | 17 | 17 |
| 27 | 11 | | 27 | 21 |
| 28 | 14 | | 28 | 18 |
| 29 | 2 | | 29 | 16 |
| 34 | 12 | | 34 | 16 |
| 38 | 18 | | 39 | 11 |
| 40 | 8 | | 40 | 15 |
| 42 | 7 | | 42 | 9 |
| 43 | 3 | | 44 | 16 |
| 45 | 5 | | 45 | 7 |
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| 49 | 14 | | | 50 | 14 |
| 51 | 22 | | | 52 | 10 |
| 55 | 8 | | | 55 | 18 |
| 56 | 7 | | | 57 | 6 |
| 57 | 16 | | | 58 | 4 |
| 59 | 3 | | | 59 | 10 |
| 64 | 5 | | | 64 | 22 |
| 65 | 7 | | | 65 | 11 |
| 68 | 12 | | | 68 | 19 |
| 69 | 7 | | | 69 | 10 |
| 70 | 6 | | | 70 | 9 |
| 72 | 1 | | | 72 | 4 |
| 72 | 15 | | | 72 | 18 |
| 76 | 11 | | | 76 | 15 |
| 77 | 0 | | | 80 | 11 |
| 82 | 16 | | | 82 | 22 |
| 84 | 16 | | | 84 | 21 |
| 85 | 6 | | | 85 | 8 |
| 87 | 2 | | | 87 | 9 |
| 88 | 12 | | | 89 | 15 |
| 90 | 13 | | | 90 | 17 |
| 94 | 6 | | | 94 | 17 |
| 96 | 8 | | | 100 | 4 |
| 101 | 6 | | | 102 | 4 |
| 105 | 13 | | | 105 | 22 |
| 107 | 10 | | | 110 | 13 |
| 112 | 8 | | | 114 | 2 |
| 119 | 22 | | | 120 | 21 |
| 126 | 13 | | | 126 | 21 |
| 127 | 12 | | | 131 | 11 |
| 132 | 3 | | | 132 | 7 |
| 148 | 13 | | | 148 | 15 |
| 152 | 12 | | | 153 | 17 |
| 155 | 22 | | | 156 | 20 |
| 157 | 7 | | | 157 | 14 |

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| 164 | 20 | | 165 | 9 |
| 171 | 4 | | 171 | 13 |
| 177 | 1 | | 177 | 15 |
| 178 | 16 | | 180 | 8 |
| 181 | 10 | | 182 | 1 |

Deposition testimony of Andrew T. Haas in In Re: Asbestos Cases, in the U.S. District Court for the Northern District of Georgia, Atlanta Division, taken August 22, 1980 as follows:

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| 48 | 17 | 49 | 11 |
| 51 | 11 | 51 | 18 |
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Video deposition testimony of Horton Corwin Hinshaw, Sr., M.D. taken November 18, 1984 through December 11, 1984, in In Re: Related Asbestos Cases, No. C-83-6251-RFP (all cases), in the U.S. District Court for the Northern District of California as follows:

| Page | Line | through | Page | Line |
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| | | Volume 1 | | |
| 12 | 5 | | 15 | 12 |
| 15 | 15 | | 20 | 21 |
| 21 | 26 | | 25 | 3 |
| 27 | 5 | | 28 | 12 |
| 32 | 9 | | 32 | 23 |
| 35 | 1 | | 36 | 6 |
| 37 | 19 | | 38 | 27 |
| 40 | 14 | | 41 | 11 |
| 42 | 15 | | 44 | 18 |
| 44 | 26 | | 45 | 1 |
| 46 | 27 | | 47 | 11 |
| 47 | 27 | | 50 | 1 |
| 50 | 5 | | 51 | 4 |
| 53 | 20 | | 54 | 7 |
| 54 | 27 | | 58 | 6 |
| 58 | 14 | | 58 | 17 |
| 59 | 8 | | 60 | 2 |
| 60 | 11 | | 67 | 25 |
| 68 | 8 | | 68 | 22 |
| 68 | 27 | | 70 | 2 |
| 70 | 6 | | 80 | 10 |
| 83 | 7 | | 83 | 20 |
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| 83 | 24 | | 85 | 3 |
| 85 | 7 | | 85 | 13 |
| 86 | 10 | | 88 | 20 |
| 88 | 28 | | 91 | 15 |
| | | Volume 2 | | |
| 101 | 27 | | 103 | 12 |
| 103 | 18 | | 105 | 18 |
| 107 | 1 | | 109 | 10 |
| 110 | 1 | | 110 | 9 |
| 110 | 12 | | 110 | 17 |
| 110 | 25 | | 110 | 27 |
| 111 | 8 | | 112 | 28 |
| 113 | 18 | | 115 | 10 |
| 121 | 20 | | 122 | 14 |
| 123 | 12 | | 125 | 14 |
| 126 | 8 | | 128 | 13 |
| 128 | 24 | | 129 | 19 |
| 129 | 28 | | 130 | 5 |
| 130 | 25 | | 131 | 19 |

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|---|---|---|---|---|
| 132 | 6 | | 132 | 28 |

Volume 5

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|---|---|---|---|---|
| 387 | 24 | | 387 | 28 |
| 403 | 18 | | 404 | 2 |

Deposition testimony of Horton Corwin Hinshaw, Sr., M.D. taken April 23, 1982 in Jimmie L. Vaughan v. Johns-Manville, et al., No. CA3-81-0070-F, in the U.S. District Court for the Northern District of Texas as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 9 | 7 | | 12 | 11 |
| 13 | 18 | | 14 | 22 |
| 19 | 25 | | 20 | 12 |
| 21 | 3 | | 22 | 14 |
| 24 | 3 | | 24 | 20 |
| 27 | 7 | | 27 | 15 |
| 31 | 23 | | 32 | 9 |
| 35 | 23 | | 37 | 18 |
| 40 | 12 | | 43 | 2 |
| 43 | 8 | | 46 | 4 |
| 46 | 9 | | 48 | 3 |
| 50 | 1 | | 51 | 12 |
| 51 | 19 | | 57 | 14 |
| 61 | 10 | | 62 | 3 |
| 80 | 3 | | 80 | 20 |
| 81A | 5 | | 84 | 19 |
| 85 | 16 | | 86 | 20 |
| 88 | 9 | | 88 | 15 |

Defendants reserve the right to offer testimony identified by any party, Plaintiffs or Defendants.

Deposition testimony of Dr. Forde A. McIver in O. L. Allen v. Fibreboard Corporation, No. B-81-276-CA, in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken on April 9, 1982.

Deposition testimony of Iris Ryder in Robert Lee Kenney, et al. v. Standard Insulations, Inc., et al., in the U.S. District Court for the District of Kansas and Other Jurisdictions, taken January 30, 1986, as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 9 | 9 | | 10 | 11 |
| 28 | 3 | | 28 | 9 |
| 33 | 20 | | 34 | 13 |
| 35 | 10 | | 35 | 21 |
| 42 | 8 | | 42 | 14 |
| 62 | 20 | | 63 | 15 |
| 73 | 25 | | 74 | 12 |

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Trial testimony of Joseph Ralph Shrode taken in Clarence Borel v. Fibreboard Corporation, Civil Action No. 6449, in the U.S. District Court for the Eastern District of Texas, as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 857 | 25 | | 858 | 25 |
| 858 | 1 | | 859 | 17 |
| 859 | 1 | | 862 | 22 |
| 862 | 14 | | 863 | 25 |
| 863 | 4 | | 864 | 3 |
| 864 | 1 | | 868 | 25 |
| 868 | 8 | | 869 | 12 |
| 869 | 1 | | 870 | 25 |
| 870 | 15 | | 871 | 14 |
| 871 | 1 | | | |

Trial testimony of Joseph Ralph Shrode taken in Clarence Borel v. Fibreboard Corporation, Civil Action No. 6449, in the U.S. District Court for the Eastern District of Texas, as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 858 | 4 | | 858 | 25 |
| 859 | 1 | | 859 | 17 |
| 861 | 21 | | 861 | 25 |
| 862 | 4 | | 862 | 25 |
| 865 | 13 | | 865 | 25 |
| 866 | 1 | | 866 | 25 |
| 867 | 1 | | 867 | 25 |
| 868 | 1 | | 868 | 25 |
| 869 | 1 | | 869 | 12 |
| 872 | 4 | | 872 | 13 |
| 880 | 3 | | 880 | 25 |
| 881 | 1 | | 881 | 25 |

Deposition testimony of Roy Steinfurth in Jackie R. Starnes, et ux v. Combustion Engineering, Inc., et al in the U.S. District Court for the Eastern District of Tennessee, Northeastern Division, taken May 25, 1981 as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 4 | 2 | | 5 | 8 |
| 5 | 18 | | 6 | 6 |
| 6 | 10 | | 6 | 16 |
| 7 | 11 | | 10 | 12 |
| 13 | 1 | | 13 | 3 |
| 13 | 15 | | 14 | 1 |
| 17 | 21 | | 18 | 7 |
| 18 | 15 | | 20 | 12 |
| 24 | 1 | | 24 | 21 |
| 40 | 13 | | 42 | 8 |
| 43 | 2 | | 43 | 5 |
| 45 | 19 | | 46 | 2 |

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| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 48 | 9 | | 48 | 22 |
| 53 | 22 | | 55 | 4 |
| 60 | 11 | | 60 | 16 |
| 62 | 4 | | 62 | 16 |
| 66 | 1 | | 67 | 12 |
| 69 | 13 | | 70 | 11 |
| 71 | 20 | | 72 | 5 |
| 73 | 20 | | 74 | 11 |
| 77 | 9 | | 77 | 11 |
| 78 | 11 | | 78 | 17 |
| 87 | 7 | | 87 | 19 |
| 89 | 6 | | 90 | 3 |
| 92 | 21 | | 94 | 10 |
| 94 | 22 | | 96 | 2 |

Deposition testimony of Johnnie M. Stoma in Johnnie M. Stoma v. Johns-Manville Sales Corporation, et al., in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken October 9, 1981 as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 7 | 5 | | 7 | 25 |
| 8 | 1 | | 8 | 2 |
| 8 | 18 | | 8 | 25 |
| 9 | 1 | | 9 | 2 |
| 18 | 15 | | 18 | 25 |
| 19 | 1 | | 19 | 6 |
| 20 | 21 | | 20 | 25 |
| 21 | 1 | | 21 | 3 |
| 21 | 9 | | 21 | 18 |
| 21 | 22 | | 21 | 25 |
| 22 | 1 | | | |
| 104 | 18 | | 104 | 25 |
| 105 | 1 | | 105 | 6 |
| 107 | 22 | | 107 | 25 |
| 108 | 1 | | 108 | 25 |
| 109 | 1 | | 109 | 3 |
| 146 | 6 | | 146 | 13 |

Deposition testimony of Dr. Hans Weill in Ernest Howell v. Johns-Manville Sales Corporation, et al., No. M-80-169-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

| Page | Line | through | Page | Line |
|---|---|---|---|---|
| 4 | 10 | | 14 | 16 |
| 14 | 17 | | 15 | 15 |
| 15 | 16 | | 23 | 5 |
| 23 | 6 | | 40 | 23 |
| 41 | 2 | | 46 | 17 |

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| | |
|---|---|
| 46 | 18 |
| 47 | 11 |
| 48 | 21 |
| 52 | 13 |
| 52 | 18 |
| 53 | 17 |
| 67 | 6 |
| 71 | 2 |
| 77 | 12 |
| 78 | 14 |
| 89 | 15 |
| 92 | 9 |

| | |
|---|---|
| 47 | 10 |
| 48 | 16 |
| 52 | 12 |
| 52 | 17 |
| 53 | 16 |
| 66 | 21 |
| 71 | 1 |
| 74 | 4 |
| 77 | 20 |
| 78 | 19 |
| 90 | 12 |
| 94 | 18 |

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# CCR DEFENDANTS' GENERAL LIST OF MEDICAL, STATE-OF-THE-ART, ECONOMIC, LIABILITY AND DAMAGE EXPERTS

1. Dr. Elvin Adams, (by deposition), General Conference of SDA's, 6840 Eastern Avenue, N.W., Washington, D.C. 20012. Testimony will be by deposition given in: "Robert Solomon v. Armstrong, Inc.", No. TY-84-39-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division.
Dr. Adams will testify on asbestos-related diseases' effects, and in particular on the effects of smoking cigarettes.

2. Dr. Oscar Auerbach, 158 Long Hill Drive, Short Hills, New Jersey 07078, (201) 675-6988.

Dr. Auerbach will testify regarding the pathology of the Plaintiff and/or Plaintiff's decedent. Dr. Auerbach will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

3. Dr. Howard E. Ayer, Department of Environmental Health, College of Medicine, Kettering Laboratory (056), University of Cincinnati, Cincinnati, OH 45267, (513) 558-5710.

Dr. Ayer will testify on industrial hygiene and threshold limit values, product testing, emissions, development of knowledge regarding asbestos exposure, product warnings, dust counting equipment and techniques, and/or documentary testimony relevant to the defense of plaintiff(s) claims.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

4. Dr. Stephen Ayres, live or by deposition, Department of Internal Medicine, 1325 South Grand Avenue, St. Louis, MO 63104. If by deposition, testimony will be by deposition given in: "In re: Asbestos Personal Injury Cases" in the following courts: Circuit Court of Baltimore City, Maryland, Circuit Court for Washington County, Maryland; Circuit Court for Prince Georges County, Maryland; Circuit Court for Cecil County, Maryland; Circuit Court for St. Mary's County, Maryland; Superior Court of Washington; District of Columbia, Civil Division; Circuit Court of Alleghany County, Maryland; United States District Court for the District of Columbia; United States District Court of Maryland; and Circuit Court for Baltimore County, Maryland BCA 1 through 4, taken on August 10 through August 12, 1989 in Baltimore, Maryland.

Dr. Ayres will testify on historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. Ayres will testify as to the Saranac papers and that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.



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5. Dr. Joseph H. Bates, 4300 West 7th Street, Little Rock, Arkansas 72205, (501) 660-2029.

Dr. Bates will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Dr. Bates will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. Bates will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

6. Dr. Brian Bradley, The Lung Center, 403 Woodlawn, Pasadena, TX 77504, (713) 941-0088.

Dr. Bradley is a specialist in the area of respiratory diseases. Dr. Bradley will testify as to all matters pertaining to his examination of the plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Bradley will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Bradley will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaenster and Kerby. Dr. Bradley may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Bradley will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life



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expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

7. Dr. Kevin Browne, 66a Warwick Way, London, England SW1V 1RZ.

Dr. Brown will testify concerning various cancer issues, including risk of cancer, relationship between asbestosis and lung cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. General and asbestos-related pulmonary medicine issues and epidemiology relevant thereto.

Dr. Brown will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

8. Louis Burgher, M.D., Ph.D., 145 North Tower Doctors Building, 4242 Farnam Street, Omaha, NE 68131, (402) 559-2900.

Dr. Burgher will testify regarding the development of medical and scientific knowledge with respect to asbestos-related diseases in general, and with respect to the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

9. Dr. Sam H. Cade, Jr., Radiology Department, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75242, (214) 820-8228.

Dr. Cade is a B reader and will testify regarding the radiographs and CT Scans of the Plaintiff and/or Plaintiff's decedent.

10. Dr. Philip Cagle, Pathologist, 1200 Moursund, Room 286A, Baylor College of Medicine, One Baylor Plaza, Houston, Texas 77030, (713) 798-3671.

Dr. Cagle is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically. Dr. Cagle is a pathologist who will testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the plaintiff. Dr. Cagle may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.



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11. Gregorio I. Casar, M.D., Respiratory Consultants of Houston, Smith Tower, 6550 Fannin, Ste 2403, Houston, TX 77030, (713) 790-6250.

Dr. Casar is a specialist in the area of respiratory diseases. Dr. Casar will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Casar will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Casar will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Casar may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Casar will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

12. Dr. Andrew Churg, The University of British Columbia, 2211 Wesbrook Mall, Vancouver, B. C. Canada V6T1W5.

Dr. Churg will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Dr. Churg may also testify regarding his review of the pathology of the Plaintiff(s) and/or Plaintiffs' decedent.

13. Dr. Thomas V. Colby, Department of Laboratory Medicine and Pathology, Mayo Clinic, 13400 E. Shea Blvd., Scottsdale, AZ.85259 (602) 301-7099.

Dr. Colby will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.



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14. Dr. Bobby F. Craft, Industrial Health, Inc., 640 East Wilmington Avenue, Salt Lake City, Utah 84106.

Dr. Craft will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's.

15. Dr. John E. Craighead, Chairman, Department of Pathology, A249 Given Medical Building, University of Vermont College of Medicine, Burlington, Vermont 05401, (802) 425-3480.

Dr. Craighead will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto. Cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

Dr. Craighead will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

16. Dr. James Crapo, 4650 South 4th Street, Englewood, CO 80110 (303) 221 - 6695.

Dr. Crapo will testify concerning the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

17. Dr. Johanna Davies, 5 Pine Street, Albany, NY, (518) 262-5345.

Dr. Davies will testify regarding the development of medical and scientific knowledge with respect to asbestos-related diseases in general, and with respect to the medical condition of plaintiffs.



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This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

18. Dr. George Delclos, Pulmonary Section F907, Methodist Hospital, 6550 Fannin, Suite 2403, Houston, Texas 77030, (713) 790-6250.

Dr. Delclos is a specialist in the area of respiratory diseases. Dr. Delclos will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Delclos will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Delclos will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Delclos will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

19. Dr. Harry B. Demopoulos, Pathologist, Health Maintenance Programs, Inc., P.O. Box 252, Valhalla, New York 10595, (914) 592-3155.

Dr. Demopoulos will testify regarding historical review and state of the art of asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto, various cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

Dr. Demopoulos will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect



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of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, the witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

It is also expected that Dr. Demopoulos will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases in the late 1960's or early 1970's. Dr. Demopoulos will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

20. Dr. Scott R. Donaldson, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, Texas 75080, (214) 680-0666.

Dr. Donaldson is a specialist in the area of respiratory diseases. Dr. Donaldson will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Donaldson will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Donaldson will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Donaldson will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical



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community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

21. William Dyson, Ph.D., Workplace Hygiene, L.L.C., 6518 Airport Parkway, Suite 203, Greensboro, NC 27409, Tel: (336) 297-1642, Fax: (336) 297-1643.

Dr. Dyson will testify regarding state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

22. William Lee Eschenbacher, M.D., F988, Pulmonary Function Laboratory, The Methodist Hospital, 6565 Fannin Street, Houston, Texas 77030, (713) 790-2076.

Dr. Eschenbacher is a specialist in the area of respiratory diseases. Dr. Eschenbacher will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the bases of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Eschenbacher will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Eschenbacher will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Eschenbacher may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Eschenbacher will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.



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23. Dr. Gregory Foster, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, Texas 75080, (214) 680-0666.

Dr. Foster is a specialist in the area of respiratory diseases. Dr. Foster will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Foster will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Foster will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Foster will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

24. Dr. Edward A. Gaensler, 63 Eucalyptus Knoll, Mill Valley, CA 94941 (415) 381-5863.

Dr. Gaensler will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto, various cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology, cancer causation and lack of association of various types and forms of cancer with asbestos.

Dr. Gaensler will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos: cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life



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expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, the witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

It is also expected that Dr. Gaensler will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's. Dr. Gaensler will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

25. Michael A. Graham, M.D., Division of Forensic and Environmental Pathology, St. Louis University School of Medicine, 1402 Grand Avenue Boulevard, St. Louis, MO 63104, (314) 577-8298

Dr. Graham is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effects on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically. Dr. Graham is a pathologist who will testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the plaintiff. Dr. Graham may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

26. Dr. Donald Greenberg, The Methodist Hospital, Department of Pathology, 6565 Fanning, 2nd Floor, Houston, Texas 77030, (713) 723-9041. By deposition given in the case of Spruit v. The Celotex Corporation, et al, CA3-85-1979-D, U.S. District Court for the Northern District of Texas, Dallas Division.

Dr. Greenberg will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

27. Kathryn A. Hale, M.D., Assistant Professor of Medicine, Baylor College of Medicine and The Methodist Hospital, 6550 Fannin, Smith Tower #1236, Houston, TX 77030, (713) 790-2076.

Dr. Hale is a specialist in the area of respiratory diseases. Dr. Hale will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition;



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her prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Hale will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Hale will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Hale may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Hale will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

28. Dr. Peter Heidbrink, Board Certified Pulmonary Specialist at Southwest Pulmonary Associates, St. Paul Professional Building #2, 5959 Harry Hines Boulevard, Suite 711, Dallas, Texas 75235, (214) 879-6555.

Dr. Heidbrink is a specialist in the area of respiratory diseases. Dr. Heidbrink will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Heidbrink will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Heidbrink will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Heidbrink will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the



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general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

29. Dr. Elliott Hinkes, Board Certified Oncologist and Hematologist at 301 North Prairie Avenue, Suite 311, Inglewood, California 90301, (213) 674-0050.

Dr. Hinkes will testify regarding various cancer issues including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology, cancer causation and lack of association of various types and forms of cancer with asbestos. Dr. Hinkes will testify concerning the relationship of asbestos and smoking to the development of cancer. Dr. Hinkes will also testify concerning the incidence of lung cancer among individuals with asbestosis or exposure to asbestos-containing products.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

30. Dr. H. Corwin Hinshaw (by deposition), retired Emeritus Professor of Medicine at the University of California School of Medicine, P.O. Box 546, Belvedere, California 94920, (415) 435-9512. Testimony will be by deposition given in "In Re: Related Asbestos Cases", No. C-83-6251-RFP, in the United States District Court for the Northern District of California; "In Re" Related Shipyard and Applicator Cases: Alameda County Asbestos Litigation", in the Superior Court of the State of California, in and for the County of Alameda; Misc. No. 959, "In Re: Shipyard and Applicator Cases" (Clapper & Brayton) Consolidated for Discovery, in the Superior Court of the State of California, in and for the County of Solano; and "In Re" San Francisco Asbestos Complex Litigation", in the Superior Court of the State of California, in and for the City and County of San Francisco. "Jimmie L. Vaughan v. Johns-Manville, et al", No. CA3-81-0070-F.

Dr. Hinshaw will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary medicine and epidemiology relevant thereto.

Dr. Hinshaw will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life



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expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

It is also expected that Dr. Hinshaw will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's. Dr. Hinshaw will not testify concerning the diagnosis or physical condition of these particular Plaintiffs. See above listed depositions for additional opinions.

31. Dr. John R. Holcomb, Pulmonary Physicians, 4410 Medical Drive, Ste. 440, San Antonio, TX 78229, (210) 692-9400.

Dr. Holcomb is a specialist in the area of respiratory diseases. Dr. Holcomb will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Holcomb will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Holcomb will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Holcomb may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Holcomb will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

32. Thomas Howard, M.D., Osler Medical Center, Suite 300, 930 South Harbor City Blvd., Melbourne, FL 32901, (407) 725-5050.



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Dr. Howard will testify regarding state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

33. William Hughson, M.D., 3969 4th Avenue, Suite 202, San Diego, CA 92103, (619) 294-6206.

State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seldman and Selikoff, Morgan, and Lampshear, among others.

34. Dr. Dala R. Jarolim, 12305 S. 14th Street, Jenks, Oklahoma 74037-4903, (918) 683-3261.

Dr. Jarolim is an oncologist and will testify regarding the diagnosis of cancer, the inability of asbestos to cause cancer in various sites throughout the human body, other potential causes of cancer, whether or not the cancer alleged by Plaintiff was caused by exposure to asbestos.

35. Dr. Robert Jones, Tulane Medical School, 1700 Perdido Street, New Orleans, Louisiana, (504) 588-5265.

Dr. Jones is a specialist in the area of respiratory diseases. Dr. Jones will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Jones will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Jones will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Jones will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific



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knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

36. Dr. Gerald Kerby, Kansas University School of Medicine, 3900 Cambridge, Kansas City, KS, (913) 588-6045.

Dr. Kerby is a specialist in the area of respiratory diseases. Dr. Kerby will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Kerby will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Kerby will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Kerby will also testify regarding the anatomy and function of the respiratory and circulatory systems: the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

37. Arthur Langer, Ph.D., Institute of Applied Sciences, Brooklyn College of the City University, New York, New York, (718) 951-4793.

Dr. Langer is a mineralogist with a Ph.D. from Columbia University. Dr. Langer is a professor of mineralogy at City University, New York, New York, and director of the Environmental Sciences Laboratory of the Institute of Applied Sciences, Brooklyn College of the City University of New



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York. Dr. Langer is expected to identify and describe the various methods by which inorganic material, from aerosols, bulk samples, or tissue, may be analyzed chemically, crystallographically, and structurally.

Dr. Langer is expected to testify about the various types of asbestos fiber, the geographic locations where the fibers can be found, the potential biologic activity of the various fibers in the human lung (including inorganic toxicity), the physical and chemical characteristics of the various asbestos fibers, and the identification and characterization of asbestos fibers.

Dr. Langer is expected to testify as to the types of inorganic minerals found in the lung tissue of persons with malignant mesothelioma and which are associated with the incidence of malignant mesothelioma in humans. Dr. Langer is expected to identify the types of fiber that have been shown to create an increased risk for malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of malignant mesothelioma. Dr. Langer is expected to testify as to the potential for certain finished asbestos containing products to be contaminated with inorganic minerals and the amounts of the types of trace contaminants that may be found in the products. Dr. Langer is expected to offer testimony as to the amount of contaminants that are found in finished asbestos-containing products--if any--and the chemical, crystallographic, and structural composition of the contaminants. Dr. Langer is expected to testify as to the levels of airborne contaminants that can be generated from a finished product--if any. Dr. Langer is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products did not result in a release of any contaminants sufficient to cause disease in persons such as plaintiff. Dr. Langer is expected to testify that his work, and the literature, do not establish that certain encapsulated products are contaminated with tremolite asbestos. A copy of Dr. Langer's C.V. will be made available upon request.

38. James E. Lockey, M.D., M.S., 3848 Chimney Hill Drive, Cincinnati, Ohio 45241.

Dr. Lockey will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

39. DR. John C. Maddox, Department of Pathology, Riverside Hospital. J. Clyde Morris Blvd., Newport News, Virginia 23601, (757) 594-2000.

Dr. Maddox shall testify as to the pathological diagnosis of asbestosis, lung cancer, colon cancer and mesothelioma, and the association between asbestos (including the various types) and the alleged disease process involving the plaintiff. Dr. Maddox will further testify as to the contribution, if any, of exposure to John Crane's products in the causation of the plaintiff's asbestos-related disease. Finally, Dr. Maddox shall testify, in cases where sufficient lung tissue is available, as to the burden of



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asbestos (including the various types) in plaintiff's lungs and its contribution, if any, in causing plaintiff's asbestos-related disease..

40. Dr. Forde A. McIver, (by deposition), Pathology Associates, P.A., 135 Rutledge Avenue, Charleston, South Carolina 29401, (803) 768-8595. Testimony will be by deposition in "O.L. Allen v. Fibreboard Corporation", No. B-81-276-CA, in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken on April 9, 1982.

Dr. McIver will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. McIver will testify as to the Saranac papers and to the effect that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's. See deposition for additional opinions.

41. Dr. Joseph M. Miller, Box 365, New Hampton, New Hampshire, (603) 536-3732.

Dr. Miller will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. Miller will testify as to the Saranac papers and to the effect that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's.

42. William K.C. Morgan, M.C., University Hospital, University of Western Ontario, Post Office Box 5339, Postal Station A, London, Ontario, Canada N6A 5A5, (519) 663-3606.

Dr. Morgan is a professor of medicine and director of chest diseases services at the University of Western Ontario. He was educated in England and Scotland, and among other appointments, is a member of the Advisory Board for Occupation Health & Safety Resource Center at the University of Western Ontario. He has knowledge of the pathology, diagnosis, testing and causation of pulmonary and related diseases, including mesothelioma, lung cancer and asbestosis. He will testify about the state-of-the-medical-art as it relates to knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. Dr. Morgan will also testify as to the Saranac papers and to the effect that Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's. He may testify about the plaintiffs' medical condition..

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

43. Jack E. Peterson, M.D., 2830 Via Viejas Oeste, Alpine, CA 91901, (619) 445-9668.

Industrial hygiene issues including threshold limit values. Historical review and state of the art of pulmonary medicine and asbestos-related conditions.



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This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

44. Dr. Sheldon Rabinovitz, 966 Hungerford Drive, Suite 20, Rockville, MD 20852.

Dr. Rabinovitz will testify regarding the quantity and quality of information available to defendants relating to asbestos and its ability to cause disease and the reasonableness of the response thereto.

Dr. Rabinovitz will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

45. Dr. Jon Ritter, Division of Surgical Pathology, Suite 300, Peters Building, Washington University Medical Center, One Banes Hospital Plaza, St. Louis, MO 63110, (314) 362-0101.

Dr. Ritter is a pathologist. Based on his review of medical records, including pathology materials, he will testify about the Plaintiff's(s') medical condition, and the cause of Plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and Plaintiff's(s') specifically, and the effect that other substances have on human health generally and Plaintiff's(s') condition specifically. Dr. Ritter may also testify regarding the medical conditions of each Plaintiff based on review of medical records, x-rays. Plaintiff's(s') experts' reports and supplemental reports.

46. Dr. Victor L. Roggli, Duke University Medical Center, Dept. of Pathology, Box 3712, Durham, North Carolina 27710, (919) 286-0411.

Dr. Roggli is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically.

47. Robert M. Ross, M.D., Certified American Board of Internal Medicine, Pulmonary Diseases, 6550 Fannin. Suite 2403, Texas Medical Center , Houston, TX 77030, (713) 383-6100.

Dr. Ross is a specialist in the area of respiratory diseases. Dr. Ross will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition;



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his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Ross will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Ross will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Ross will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

48. Wayne Ruhter and Helen Reynolds, Ruhter & Reynolds, Inc. 3625 N. Hall Street, Suite 1060, Dallas Texas 75219.

Wayne Ruhter and Helen Reynolds are economists and may testify regarding any economic loss alleged by the plaintiff.

49. Dr. Irving J. Selikoff, Deceased. Mt. Sinai School of Medicine, One Gustave Levy Plaza, New York, NY.

Dr. Selikoff will testify by deposition taken in Rogers v. Johns-Manville, on February 19, 1971, regarding the relationship between asbestos and disease, knowledge concerning same in state of the art, and all topics reflected in defendants deposition designations.

50. Dr. Kahili Sheibani, Department of Pathology, Western Medical Center, 1001 N. Tuston Ave., Santa Anna, CA 92705, (714) 953-3554.

Dr. Sheibani will testify regarding the pathology of the Plaintiff and/or Plaintiff's decedent. Dr. Sheibani will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

51. Mr. Russell D. Sherwin, 2011 Zonal Avenue, HMR-201, Los Angeles, California 90033-1054.



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Dr. Sherwin will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Dr. Sherwin will testify regarding the pathology of the Plaintiff(s) and/or Plaintiffs' decedent.

52. Dorsett D. Smith, M.D., 4310 Colby, Suite 201, Everett, WA 98203, (206) 259-5171.

Historical review and state of the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

53. Jesse Steinfield, (by deposition).

Jesse Steinfield will testify concerning government warnings, union knowledge, smoking, and some areas of state-of-the art.

54. Dr. Paul M. Stevens, Board Certified Pulmonary Disease Specialist and Professor of Medicine at the Baylor College of Medicine in Methodist Hospital in Houston, Texas, (713) 790-6492.

Dr. Stevens is a specialist in the area of respiratory diseases. Dr. Stevens will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Stevens will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Stevens will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Stevens will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life



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expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

55. Gail Stockman, M.D., 815 North Fourth Street, Suite A, Longview, TX 75601, (903) 753-0787.

Dr. Stockman is a specialist in the area of respiratory diseases. Dr. Stockman will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; her prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Stockman will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.

Dr. Stockman will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

56. J.C. Wagner, M.D., Cardiff, Wales, United Kingdom.

Dr. Wagner will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology, and epidemiology relevant thereto.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

57. Dr. Hans Weill, live or by deposition testimony in "Ernest Howell v. Armstrong World Industries, Inc., et al", No. M-80-169-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, in the U.S. District Court for the Eastern District of Texas, Tyler Division, a Board Certified Pulmonary Specialist at Tulane Medical School, 1700 Perdido Street, New Orleans, Louisiana, 70310, (504) 588-5838.



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Dr. Weill will testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure. Dr. Weill will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

It is also expected that Dr. Weill will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases in the late 1960's or early 1970's. Dr. Weill will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

58. William Weiss, M.D., c/o Hahnemann Medical College, Philadelphia General Hospital, Philadelphia, PA, (215) 762-7724.

Dr. Weiss will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general pulmonary radiology and/or ILO interpretation of x-rays.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

59. Dr. Thomas Wheeler, (by deposition), The Methodist Hospital, Department of Pathology, 6565 Fannin Street, Mail Station 205, Houston, Texas 77030, (713) 790-3311.

Dr. Wheeler will testify regarding general pathology and the pathology of the Plaintiff and/or Plaintiff's decedent.

60. Dr. Mark Robert Wick, Division of Surgical Pathology, Box 214, University of Virginia, Medical Center, Charlottesville, Virginia 22908, (804) 924-9038.

Dr. Wick is a pathologist. Based on his review of medical records, including pathology materials, he will testify about the Plaintiff's(s') medical condition, and the cause of Plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and Plaintiff's(s') specifically, and the effect that



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other substances have on human health generally and Plaintiff's(s') condition specifically. Dr. Wick may also testify regarding the medical conditions of each Plaintiff based on review of medical records, x-rays, Plaintiff's(s') experts' reports and supplemental reports.

61. Dr. R. Keith Wilson,2753 S. Utica, Tulsa,Oklahoma, 74114.

Dr. Wilson is a specialist in the area of respiratory diseases. Dr. Wilson will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases: his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Wilson will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Wilson will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos.

Dr. Wilson will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

62. Any prior deposition or trial testimony of any witness called by any other party either live or by deposition.

63. Any prior deposition or trial testimony of any physician who has treated, examined, or been consulted regarding the Plaintiff.

64. Any deposition or custodian of records concerning the Plaintiff.

65. Any deposition taken by any party in this case and the depositions listed in Defendants' Designation of Deposition Testimony.

66. All physicians who have seen, examined, or treated, Plaintiff and/or autopsied Plaintiff's decedent.



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67. Defendants reserve the right to use any affidavit, deposition, answer to interrogatories, and/or answers to requests for admissions made by any party to this action.

68. Defendants reserve the right to call any witness who may be necessary for rebuttal testimony.

69. All other expert and factual witnesses designated or listed by plaintiffs and defendants in this lawsuit.



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