PLAINTIFF'S EXHIBIT

UC-2044

CAUSE NO. 97CI-15498

AMELIA SANCHEZ GARCIA, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE HEIRS AND AND ESTATE OF JOSE A. GARCIA, JR., DECEASED	§	IN THE DISTRICT COURT OF
	§	BEXAR COUNTY, TEXAS
VS.	§	
OWENS-CORNING, ET AL.	§	150TH JUDICIAL DISTRICT

DEFENDANT UNION CARBIDE CORPORATION'S RESPONSES TO PLAINTIFF JOSE A. GARCIA'S REQUEST FOR DISCLOSURES

COMES NOW, Defendant, Union Carbide Corporation, and files these Responses to Plaintiff Jose A. Garcia's Requests for Disclosure.

Respectfully submitted,

DEHAY & ELLISTON, L.L.P.
3500 BANK OF AMERICA PLAZA
901 Main Street
Dallas, Texas 75202-3736
(214) 210-2400
(214) 2102500 (fax)

By: _____
BRENT M. KARREN
State Bar No. 00784371
MISTI D. MOSTELLER
State Bar No. 24012778

COUNSEL FOR DEFENDANT

Union Carbide trial exhibit UC-2044: Union Carbide Corporation's Responses to Plaintiff's Requests for Disclosure i... Published by AsbestosClaims.Law
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument has been forwarded to counsel of record for Plaintiff, Mr. Russell Budd, by hand delivery, Baron & Budd, P.C., 3102 Oak Lawn Avenue, The Centrum, Suite 1100, Dallas, Texas 75219 herein, via Certified Mail, Return Receipt Requested, and to all other counsel of record regular mail on this the 12 day of July, 2001.

MISTI D. MOSTELLER

Union Carbide trial exhibit UC-2044: Union Carbide Corporation's Responses to Plaintiff's Requests for Disclosure i... Published by AsbestosClaims.Law
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(b) the name, address, and telephone number of any potential parties;

Defendant is unaware at this time of any potential parties who have not been named in Plaintiffs' Petition.

(c) the legal theories and, in general, the factual bases of the responding party's defenses (the responding party need not marshal all evidence that may be offered at trial):

Defendant's defenses are outlined in its Answer to Plaintiffs' Petition and any amendments filed thereto. Without waiving any defense stated therein, Defendant contends the following generally:

Defendant will dispute that Plaintiff(s)'s alleged injuries are asbestos related. Defendant contends that each Plaintiff contributed to cause his or her own alleged injury and/or death by smoking and/or other actions and lifestyle choices. Defendant also contends that the acts or omissions of others contributed to cause each Plaintiff's alleged injuries and/or death.

No product manufactured, sold or distributed by Defendant caused any alleged injury to Plaintiff(s). Each Plaintiff was either not exposed to Defendant's products, or any alleged exposure did not contribute to cause any Plaintiff's alleged injury. Defendant will present a "state of the art" defense to demonstrate that Defendant was charged with no greater knowledge than that of the medical and scientific community. Defendant will deny that it breached any duty to warn and will deny that its products were defective.

(d) the amount and any method of calculating economic damages;

Defendant is unaware at this time of Plaintiff's method of calculating economic damages, if any.

(e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

Defendant does not know each person with knowledge of relevant facts. Defendant states that each Plaintiff, all witnesses named or designated by each Plaintiff, all Defendants, all witnesses named or designated by other Defendants, co-workers of each Plaintiff, family members of each Plaintiff, medical personnel who have treated or examined each Plaintiff and medical personnel who have reviewed records, x-rays and/or pathology of Plaintiff may all have knowledge of relevant facts. Defendant additionally incorporates herein Defendant's witness lists, exhibit lists and designations of deposition testimony, on file or to be filed in

Union Carbide trial exhibit UC-2044: Union Carbide Corporation's Responses to Plaintiff's Requests for Disclosure i... Published by AsbestosClaims.Law
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this case, as well as Defendant's responses to Dallas County Master Discovery, which have been previously provided to Plaintiff's counsel.

(f) for any testifying expert:

(1) the expert's name, address and telephone number;
(2) the subject matter on which the expert will testify;
(3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the Responding party, documents reflecting such information;
(4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
(A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
(B) the expert's current resume and bibliography;

Defendant incorporates herein Defendant's witness lists, exhibit lists and designations of deposition testimony, on file or to be filed in this case, as well as Defendant's responses to Dallas County Master Discovery, which have been previously provided to Plaintiff's counsel. Defendant does not have information regarding testifying experts of each Plaintiff or of other Defendants.

Exhibit A: Union Carbide Corp.'s Fact and Expert Witness List.

Exhibit B: Defendants' List of Potential Deposition and Trial Testimony and Defendants' Line and Page Designations.

Exhibit C: CCR Defendants' General List of Medical, State-of-the-Art Economic, Liability and Damage Experts.

Exhibit D: CCR Defendants' Exhibit List.

(g) any discoverable indemnity and insuring agreements;

It is impossible to answer this request with specificity because a number of factors determine which carrier or carriers may be required to respond to any particular claim. Documents which may expand upon the response are available for inspection. An index is available.

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(i) **any discoverable witness statements;**

Defendant is not aware of any discoverable witness statements other than any depositions which have been or will be taken in this case.

(j) **in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills;**

These documents, to the extent Defendant possesses them, will be made available to Plaintiff for review and copying at a mutually agreed upon time.

(k) **in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.**

These documents, to the extent Defendant possesses them, will be made available to Plaintiff for review and copying at a mutually agreed upon time.

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EXHIBIT "A"

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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 "B"

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EXHIBIT "B"

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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:

Page	Line	through	Page	Line
4	8		8	2
8	17		11	11
11	14		12	5
12	11		15	4
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.

Page	Line	through	Page	Line
		Volume 1		
7	11		7	13
8	20		15	17
15	21		17	2
17	4		18	13
18	15		20	3
20	5		21	11

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Page	Line	through	Page	Line
21	3		21	14
21	16		21	17
21	19		24	12
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
65	10		65	14
65	16		65	20
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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Page	Line	through	Page	Line
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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Page	Line	through	Page	Line
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
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
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
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:

Page	Line	through	Page	Line
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
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:

Page	Line	through	Page	Line
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
46	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
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 Division, as follows:

Page	Line	through	Page	Line
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:

Page	Line	through	Page	Line
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
46	16		47	18
48	19		49	4

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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

Page	Line	through	Page	Line
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:

Page	Line	through	Page	Line
6	20		6	24
20	14		20	22
27	13		32	4
38	12		41	8
42	18		43	10
44	1		47	24

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132	6		132	28

Volume 5

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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48	17	49	11
51	11	51	18
55	18	60	8

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

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	8

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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EXHIBIT "C"

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

Dr. Auerbach will testify by deposition 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. 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.

5. Dr. Peter Barrett, Chief of Radiology, Quincy City Hospital, Quincy, MA 02169 Dr. Barrett may testify about the plaintiff's medical condition, the presence or absence of asbestos related disease and about the historical "state-of-the-art," he will also testify development of medical knowledge about asbestos, and presence or absence of medical consequences relating to low dose exposure to asbestos emanating from asbestos-containing products. Dr. Barrett may testify specifically about diseases, such as chronic obstructive pulmonary disease, even though in some cases he may not have seen plaintiffs, or reviewed medical records of the plaintiffs. Dr. Barrett may testify in the area of general medicine as it relates to the development of an asbestos-related disease.

6. 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.

7. 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 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.

8 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. Dr. Bruce Case, Department of Pathology, McGill University 3775, University Street Montreal, Quebec H3A 2B4 Canada.

It is impossible to set forth in precise detail the exact topics and content of the testimony of Dr. Case. Dr. Case has researched asbestos and asbestos medicine for many years. He has opinions about his research, his studies, the development of knowledge about asbestos, and about the relationship of asbestos to disease. Dr. Case has specific opinions about the development of the disease, mesothelioma, and its relationship to crocidolite, amosite, and chrysotile. He will offer opinions about his research into chrysotile and where and how it might be implicated in the development of asbestosis, mesothelioma, and any lung cancer. Dr. Case is expected to testify about the epidemiology of asbestos related diseases and the incidence of disease in both men and women.

Dr. Case is a pathologist and epidemiologist at the McGill University. He will testify generally about the evolution of asbestos disease; the pathology of asbestos-related diseases including those named as "Non-Routine"; the "state-of-the-art" of asbestos-related diseases; and, will testify about other areas of pulmonary pathology including, but not limited to, emphysema, carcinomas, and related matters.

Dr. Case may testify regarding the diagnosis and cause of plaintiffs' condition. He will discuss the differing physical, chemical and biological properties of various types of asbestos fibers, and will explain to the jury that chrysotile fibers are incapable of causing, or unlikely to have caused, plaintiffs' alleged condition. Dr. Case is expected to provide testimony in the following areas:

1. anatomy and function of the respiratory and circulatory systems and the diagnosis and treatment of disease affecting such systems;

2. the nature of asbestos and asbestosis;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity;

4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;

5. the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system and other causes of obstructive and restrictive disease or defects of the respiratory system;

6. methods of diagnosis of various diseases, particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases;

7. incidence of lung cancer among individuals with asbestosis or asbestos exposure without asbestosis, compared with non-asbestotic asbestos workers, non-asbestos exposed workers, and with the general population;

8. the import of any exhibit (including without limitation, corporate documents of defendants) introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;

9. cigarette smoking and its effect on the lung and other organs;

10. the relative danger of these defendants' asbestos-containing products;

11. the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect;

12. difference between impairment and disability;

13. effect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy; effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

Dr. Case is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies. Dr. Case is expected to testify that there is difference between the various asbestos fibers and their individual ability to produce or contribute to specific asbestos related disease. He is expected to testify about this difference in this fiber potential. Dr. Case is also expected to testify about the dose responses relationship for asbestosis, lung cancer, and mesothelioma. Dr. Case will testify about threshold levels for various diseases. Dr. Case may be provided with specific fiber burden studies and asked for his opinions about those

fiber burden studies. Dr. Case may be provided retrospective exposure assessment evaluations by one or more individuals and asked to comment on those exposure findings as they relate to causation or substantial factors of causation.

14. Andrew Churg, The University of British Columbia, 2211 Wesbrook Mall, Vancouver, B. C. CanadaV6T1W5.

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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

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.

20. 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.

21. 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 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.

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

23. 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.

24. 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.

25. Dr. I. A. Feingold, M.D.F.R.C.P., South Miami Hospital, 6200 Southwest 73rd Street, Miami, Florida 33143, (305) 668-5229

Dr. Feingold is the Chief of the Division of Pulmonary Medicine at South Miami Hospital. He will testify as a state-of-the-art witness generally and with respect to asbestos-containing products. He may also testify concerning the physiological and radiological aspects of asbestos-related lung disease, including etiology, diagnosis, treatment, prognosis and epidemiology; the causes of lung cancer, the history of the medical science concerning our knowledge and understanding of asbestos and asbestos-related disease; fiber types, dose/response and threshold levels needed to produce disease, the relationship of asbestos exposure to other environmental factors and their comparative risks. Dr. Feingold who also testify that work with some asbestos-containing products does not result in dangerous asbestos fibers exposure that any asbestos exposure from these products played no role in the

genesis of plaintiffs' lung disease, if any.

In addition, Dr. Feingold is expected to testify about the various fiber release studies, performed at industrial hygiene laboratories, on the use of asbestos containing products. Dr. Feingold may testify, in general concerning asbestos related diseases and the effects of exposure to sbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of an asbestos related disease. He may also testify regarding the existence or non-existence of any asbestos related disease in the plaintiffs, including, but not limited to pleural changes, asbestosis, lung cancer, mesothelioma, laryngeal cancer, esophageal cancer and stomach cancer. He may also testify on whether any asbestos related disease allegedly suffered by plaintiffs was medically or proximately called by exposure to asbestos containing gasket and packing products. He may also testify on a dose response relationship between exposure to asbestos and asbestos related disease. He may also testify on increased risk of cancer issues and whether a particular plaintiff has a reasonable fear of cancer due to exposure to asbestos. He may also testify on the health consequences of smoking.

26. 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.

27. 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 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.

28. 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.

29. 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.

30. 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; 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.

31. 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 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. 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.

33. 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 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.

34. 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.

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

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.

36. 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.

37. 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.

38. 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 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.

39. 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.

40. 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 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.

41. 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.

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

43. 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.

44. 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.

45. 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.

46. 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.

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.

47. 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.

48. 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.

49. 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.

50. 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; 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.

51. 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.

52. 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.

53. 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.

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

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.

55. 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.

56. Jesse Steinfield, (by deposition).

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

57. 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 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.

58. 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.

59. 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.

60. 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.

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.

61. 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.

62. 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.

63. 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 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.

64. 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.

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

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

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

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

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

70. 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.

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

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

EXHIBIT "D"

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CCR DEFENDANTS EXHIBIT LIST
(General)

March 21, 2001

Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
1.	All exhibits listed by either party whether offered or not.						
2.	Plaintiffs' medical records						
3.	Proceedings of the American Conference of Governmental Industrial Hygienists 1946 through 1968.						
4.	Industrial Commission of Minnesota Safety Standards, 1950, 1964.						
5.	Occupational Health Standards, State of Washington, 1963						
6.	Safety Code, State of Oregon, 1945, 1949, 1956.						
7.	Industrial Safety Orders, State of California, 1968.						
8.	Public Health Code, State of Connecticut, 1947, 1949, 1951, 1954, 1958, 1961, 1964, 1965.						
9.	Regulations for Control and Prevention of Occupational Diseases, State of Florida adopted 1957, amended 1964.						
10.	Employment Safety Rules, State of Iowa, 1968						
11.	Occupation Health Standards, State of Maine, 1968						
12.	Occupational Air Contaminants and Physical Agents, Annual Administrative Code Supplements, State of Michigan, 1970-1971.						
13.	Safety Standards, State of Nevada,1955, 1964.						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
14.	Safety Regulations, State of New Jersey, 1958, 1963.						
15.	Industrial Code Rules, State of New York, 1961, 1945.						
16.	Occupational and Industrial Health Regulations, State of West Virginia, 1951.						
17.	Industrial Commission Rules, State of Wisconsin, 1964.						
18.	Letter of 03/28/87 from Dr. H. Corwin Hinshaw to Art Stamm re: unavailability.						
19.	Exhibits (as follows) attached to the deposition of Andrew T. Haas taken in Karen L. Barsh v. Keene Corporation, et al, 1986:						
19.1	Letter of 06/17/69 Hutchinson/Haas to Business Agents						
19.2	Letter 04/15/57 Sheehan to Ay						
19.3	Letter 02/11/63 Sickles to Selikoff						
19.4	Letter 02/28/62 Sickles to Selikoff						
19.5	Letter 03/01/62 Selikoff to Sickles						
19.6	Letter 06/06/63 Sickles to Selikoff						
19.7	Letter 03/16/62 Sickles to Selikoff						
19.8	Letter 02/20/63 Selikoff to Hawley						
19.9	Letter 02/20/63 Selikoff to Sickles						
19.10	19.10Letter 03/21/63 Selikoff to Sickles						
19.11	19.11Letter 06/10/63 Selikoff to Sickles						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
19.12	19.12Letter 11/03/64 Selikoff to Sickles with two letters attached both 10/28/64						
19.13	19.13Letter 10/25/65 Selikoff to Mancuso						
19.14	19.14Letter 10/25/65 Selikoff to Sickles						
19.15	19.15Letter 11/11/65 Selikoff to Sickles with attachment						
19.16	19.16Letter 10/21/65 Selikoff to Sickles						
19.17	19.17Letter 06/08/64 Hutchinson to Corresponding Secretaries						
19.18	19.18Letter 12/30/65 Hutchinson to Bush						
19.19	19.19Letter 05/11/66 Sickles to Business Agents with attachment Selikoff paper on "Occurrence of Asbestosis Among Insulation Workers in U.S."						
19.20	19.20Letter 12/06/66 Sickles to Selikoff						
19.21	19.21Letter 01/24/68 Hutchinson to Local Unions						
19.22	19.22Letter 08/14/69 Hutchinson to Local Union Officers with attachment "Diseases of the Chest"						
19.23	19.23Letter 09/26/69 Hutchinson to Local Unions						
19.24	19.24Letter 01/21/70 Hutchinson to Thornley						
19.25	19.25Letter 10/08/71 Haas to Selikoff						
19.26	19.26Undated letter Selikoff to Abel with attachment						
19.27	19.27Letter 07/16/71 Haas to Holaday with attachment						
19.28	19.28Selikoff, Hammond, & Churg "Asbestos Exposure, Smoking & Neoplasia" 06/19/67						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
19.29	19.29Selikoff Address to 21st Convention Sept. 1967						
19.30	19.30Letter 01/12/66 Haas to Robert Barsh						
19.31	19.31Letter 06/06/69 Haas to Selikoff						
19.32	19.32Letter 08/05/69 Haas to Selikoff						
19.33	19.33Letter 09/24/69 Haas to Selikoff						
19.34	19.34Letter 02/06/69 Haas to Selikoff						
19.35	19.35Letter O5/07/71 Selikoff to Haas						
19.36	19.36Letter 07/12/71 Selikoff to Haas						
19.37	19.37Letter 06/08/71 Selikoff to Haas with attachment						
19.38	19.38Letter 09/26/75 Haas to Business Managers and Agents						
19.39	19.39Letter 12/08/72 Haas to Business Agents						
19.40	19.40Mearl F. Stanton, "Biological Effects of Asbestos," October 1972						
19.41	19.41Intl. Const. & Bylaws 1967						
19.42	19.42Intl. Const. & Bylaws 1952						
19.43	19.43Intl. Const. & Bylaws 1962						
19.44	19.44Intl. Const. & Bylaws 1957						
19.45	19.45Intl. 19th Convention 09/57 reprint published, October 1957, ASBESTOS WORKER						
19.46	19.46Intl. 20th Convention 09/62 reprint, published, November 1962, ASBESTOS WORKER						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
19.47	19.47Report on the Proceedings of the Intl. 21st Convention 09/67						
19.48	19.48Insulation Hygiene Progress Reports 1969-1975						
19.49	19.49Intl. 19th Convention 09/57 reprint						
19.50	19.50ASBESTOS WORKERS NEWSLETTER Vol. 1 No.1 01/15/68						
20.	Exhibits (as follows) attached to the deposition of Roy Steinfurth, taken in Jackie R. Starnes v. Combustion Engineering, taken on 05/10/76:						
20.1	20.1Questionaire from Dr. Selikoff's office						
20.2	20.2List of Approved Respirators and cover letter of 06/17/69						
20.3	20.3Green Sheets (collectively)						
20.4	20.4Articles in the Journal Related to Health Hazards						
20.5	20.5Dr. Selikoff's presentation at the 1967 convention						
20.6	20.6Dr. Selikoff's speech at the 1967 convention appearing at pp. 8-10, published November, 1962, ASBESTOS WORKER						
20.7	20.7Dr. Selikoff's 1972 convention speech - copy of portions of actual convention proceedings						
20.8	20.8Copy of FEDERAL REGISTER, 06/07/72						
20.9	20.9Selikoff, Churg & Hammond, Article from the NYAS, 1965						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
21.	Exhibits (as follows) attached to the deposition of Andrew T. Haas, taken in Atlanta Asbestos Cases on 08/22/80						
21.1	21.1Letter Sickles to Jenning dated 04/17/67 with Questionaire						
21.2	21.2Letter Haas to all financial secretaries dated 09/13/68						
22.	Occupational Health Regulations for Maximum Permissible Concentrations of Atmospheric Contaminants in Places of Employment. Adopted by Texas State 1958.						
23.	Interrogatory Answers of any settling Defendants filed in the United States District Court for the Northern, Eastern, or Southern Districts of Texas						
24.	Any article written by any witness called by any adverse party.						
25.	Personnel files of each past employer of Plaintiff						
26.	Interrogatory Answers of Plaintiff's co-workers						
27.	Warning Labels of all manufacturers.						
28.	OSHA Warning.						
29.	Eagle Picher warning - 1964.						
30.	Photo of Eagle Picher warning.						
31.	GAF warning of Calsilite - 1964/1965						
32.	Photo of calsilite carton and warning used in 1964 & 1965.						
33.	Photo of caslite carton and warning used in 1970.						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
34.	GAF warning of calsilite - 1970.						
35.	Photos of Pittsburgh Corning warning for unibestos.						
36.	Fibreboard warning used in 1966.						
37.	Photo of Fibreboard warning used in 1966.						
38.	Keene warning used in 1969.						
39.	Photo of Keene warning used in 1969.						
40.	H.K. Porter Company, Inc., warning used 1972.						
41.	Photo of H.K. Porter Co., Inc.'s warning used in 1972.						
42	Owens-Corning Fiberglas Corporation warning for Kaylo Insulation - 1/19/67.						
43.	Photo Owens-Corning Fiberglas Corporation warning - 1/19/67.						
44.	Armstrong Cork Company warning-1966.						
45.	The Celotex Corporation warning-1972.						
46.	The Celotex Corporation warning-1976.						
47.	Union Carbide Calidria Warning, 1972						
48.	National Gypsum Caution, 1973/1974						
49.	Maremont Caution						
50.	Dana Warning						
51.	Amchem Warning						
52.	List of NIOSH Certified Roentgenographic Interpreting Physicians; B-Readers By State 2-1-95						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
200.	Curriculum Vitae of Dr. Elvin Adams						
201.	Curriculum Vitae of Dr. Oscar Auerbach						
202.	Curriculum Vitae of Dr. Howard Ayer						
203.	Curriculum Vitae of Dr. Stephen Ayres						
204.	Curriculum Vitae of Dr. Joseph H. Bates						
205.	Curriculum Vitae of Dr. Brian Bradley						
206.	Curriculum Vitae of Dr. Kevin Browne						
207.	Curriculum Vitae of Dr. Louis Burgher						
208.	Curriculum Vitae of Dr. Sam H. Cade						
209.	Curriculum Vitae of Dr. Philip Cagle						
210.	Curriculum Vitae of Dr. Gregorio Casar						
211.	Curriculum Vitae of Dr. Andrew Churg						
212.	Curriculum Vitae of Dr. Thomas V. Colby						
213.	Curriculum Vitae of Dr. Bobby Craft						
214.	Curriculum Vitae of Dr. John E. Craighead						
215.	Curriculum Vitae of Dr. James Crapo						
216.	Curriculum Vitae of Dr. J.N.P. Davies						
217.	Curriculum Vitae of Dr. George Delclos						
218.	Curriculum Vitae of Dr. Harry Demopoulos						
219.	Curriculum Vitae of Dr. Scott Donaldson						
220.	Curriculum Vitae of Dr. William Dyson						
221.	Curriculum Vitae of Dr. William Eschenbacher						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
222.	Curriculum Vitae of Dr. Gregory Foster						
223.	Curriculum Vitae of Dr. Edward Gaensler						
224.	Curriculum Vitae of Dr. Michael A. Graham						
225.	Curriculum Vitae of Dr. Donald Greenberg						
226.	Curriculum Vitae of Dr. Kathryn Hale						
227.	Curriculum Vitae of Dr. Peter Heidbrink						
228.	Curriculum Vitae of Dr. Elliott Hinkes						
229.	Curriculum Vitae of Dr. H. Corwin Hinshaw						
230.	Curriculum Vitae of Dr. John R. Holcomb						
231.	Curriculum Vitae of Dr. Thomas Howard						
232.	Curriculum Vitae of Dr. William Hughson						
233.	Curriculum Vitae of Dr. Dala Jarolim						
234.	Curriculum Vitae of Dr. Robert Jones						
235.	Curriculum Vitae of Dr. Gerald Kerby						
236.	Curriculum Vitae of Dr. James Lockey						
237.	Curriculum Vitae of Dr. Forde A. McIver						
238.	Curriculum Vitae of Dr. Joseph M. Miller						
239.	Curriculum Vitae of Dr. William K. C. Morgan						
240.	Curriculum Vitae of Dr. Jack E. Peterson						
241.	Curriculum Vitae of Dr. Sheldon Rabinovitz						
242.	Curriculum Vitae of Dr. Victor L. Roggli						
243.	Curriculum Vitae of Dr. Robert M. Ross						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
244.	Curriculum Vitae of Dr. John Sartain						
245.	Curriculum Vitae of Dr. Irvin Selikoff						
246.	Curriculum Vitae of Dr. Khalil Sheibani						
247.	Curriculum Vitae of Dr. Russell D. Sherwin						
248.	Curriculum Vitae of Dr. Dorsett Smith						
249.	Curriculum Vitae of Dr. Jesse Steinfield						
250.	Curriculum Vitae of Dr. Paul Stevens						
251.	Curriculum Vitae of Dr.Gail Stockman						
252.	Curriculum Vitae of Dr. Wayne Taylor						
253.	Curriculum Vitae of Dr. J.C. Wagner						
254.	Curriculum Vitae of Dr. Hans Weill						
255.	Curriculum Vitae of Dr. William Weiss						
256.	Curriculum Vitae of Dr. Thomas Wheeler						
257.	Curriculum Vitae of Dr. Keith Wilson						
300.	Alderson, Michael, OCCUPATIONAL CANCERS, 1986						
301.	Á.M.A., GUIDES TO THE EVALUATION OF PERMANENT IMPAIRMENT, 1985						
302.	Antman and Aisner, ASBESTOS RELATED MALIGNANCY, (Doll and Peto), 1987						
303.	Baum and Wolinski, TEXTBOOK OF PULMONARY DISEASES, 4th Edition, 1989						
304.	Braunwald, HEART DISEASE, A TEXTBOOK OF CARDIOVASCULAR MEDICINE, 2nd ed., 1980						

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Defs EX. NO.	DESCRIPTION	Marked	Offered	Object	Admit	Date	Disp. after trial
305.	Burns, David, Editor, ASBESTOS, SMOKING AND DISEASE, THE SCIENTIFIC EVIDENCE, 1982						
306.	Cotes, J.E. and Steel, WORK RELATED LUNG DISORDERS, 1987						
307.	Crystal, West, THE LUNG SCIENTIFIC FOUNDATIONS, VOL. 1 & 2						
308.	Dial & Hammer (Eds.). PULMONARY PATHOLOGY, Dial & Hammer, 1988						
309.	Doll & Peto, THE CAUSES OF CANCER, 1981						
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661.	Selikoff, Hammond, Seidman, "Mortality Experience of Insulation Workers in the U.S. and Canada, (1943-1976), anas, 1979 Vol. 330, pp. 91-116						
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