

NO. 99-06508-M

THURMAN HARMON, et al.,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
OWENS CORNING (a/k/a OWENS	§	
CORNING CORPORATION), et al.,	§	
	§	
Defendants.	§	298TH JUDICIAL DISTRICT

**DEFENDANT CELANESE LTD.'S FIRST SUPPLEMENTAL RESPONSE
TO PLAINTIFF'S REQUEST FOR DISCLOSURE**

In accordance with Rule 194 of the Texas Rules of Civil Procedure, and as a supplemental response to Plaintiff's Request for Disclosure, Defendant Celanese Ltd. ("Celanese") provides the following information in relation to Plaintiff Fidencio Orta Sanchez:

- (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:

Please refer to Celanese's Persons With Knowledge List attached hereto as Exhibit A.

- (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:

See Celanese Ltd.'s Designation of Expert Witnesses, which was served on plaintiff on November 8, 2000 and which is incorporated herein by reference.

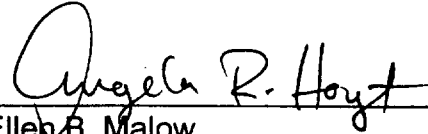
- (k) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party:**

In addition to those records listed in Defendant Celanese Ltd.'s Response to Plaintiff's Request for Disclosure, which was served on plaintiff September 18, 2000, Celanese is in possession of various other medical records of plaintiff Sanchez by virtue of authorizations furnished by him. Please see the list of those records below. Because the records are voluminous, they are not being produced herewith. The records are available, however, for inspection and copying during regular business hours at the offices of Kasowitz, Benson, Torres & Friedman LLP, 700 Louisiana, Suite 2200, Houston, Texas 77002.

1. Braglia, Roberto Dr.
Billing
2. Christus Spohn Hospital Kleberg
• Medical
3. Christus Spohn Hospital Shoreline
• Billing
• Pathology (Slides w/file)
• Medical
4. Coastal Cardiology Associates
• Billing
5. Dr. John W. Arringdale
• Medical
• Billing
6. Dr. Marty Perez
• Billing
• Medical
7. Bay Area Surgery
• Medical
• Billing
8. Dr. Julio Vela c/o Barbara Herod
• Billing NRD
• Medical NRD
9. Dr. O.J. Rodriguez
• Medical/Radiology/Pathology

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP



Ellen B. Malow
State Bar No. 12888280
Angela R. Hoyt
State Bar No. 00796783
700 Louisiana Street, Suite 2200
Houston, Texas 77002-2730
(713) 220-8800
(713) 222-0843 (Facsimile)

HAWKINS & PARNELL

Michael E. Hutchins
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308
(404) 614-7400
(404) 614-7500 (Facsimile)

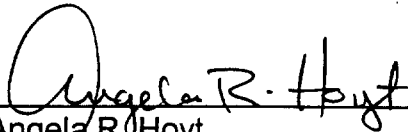
ATTORNEYS FOR DEFENDANT
CELANESE LTD.

OF COUNSEL:

Marc E. Kasowitz
Hector Torres
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
1633 Broadway
New York, New York 10019
(212) 506-1700
(212) 506-1800 (Facsimile)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via United States certified mail, return receipt requested, on counsel for plaintiffs, and via regular U.S. mail, postage prepaid, on this 8th day of December, 2000.



Angela R. Hoyt

EXHIBIT A

THURMAN HARMON, et al v. OWENS CORNING, et al.
In the 298th Judicial District of Dallas County, Texas;
Cause No. 99-06508-M

PERSONS WITH KNOWLEDGE
Fidencio Orta Sanchez

PLAINTIFF AND PLAINTIFF'S
RELATIVES:

Fidencio Orta Sanchez
321 Frances
Kingsville, Texas 78363
(361) 595-5100
Plaintiff

Frances S. Delgado
308 38th Street
Lubbock, Texas 79413
(806) 791-0825
Plaintiff's Daughter

Margarita Moreno
P.O. Box 123
Realitos, Texas
(361) 527-3612
Plaintiff's daughter

Angelica S. Stanley
P.O. Box 2186
Kingsville, Texas 78363
(361) 592-4730
Plaintiff's daughter

Benita Sanchez
321 Frances
Kingsville, Texas 78363
(361) 595-5100
Plaintiff's daughter

Herminia S. Rodriguez
1615 Connellville
Kingsville, Texas 78363
(361) 592-4138
Plaintiff's daughter

Fidencio G. Sanchez
1220 East Avenue B
Kingsville, Texas 78363
(361) 592-1887
Plaintiff's son

Imelda S. Ortegon
Route 2, Box 369B
Kingsville, Texas 78363
(361) 595-4208
Plaintiff's daughter

Feliciano Sanchez
720 East Avenue B
Kingsville, Texas 78353
(361) 592-2142
Plaintiff's daughter

Maria Elva Sanchez
P.O. Box 1617
Kingsville, Texas 78364
(361) 592-6996
Plaintiff's daughter



**PLAINTIFF'S FORMER UNION
MEMBERSHIP:**

Asbestos & Insulators Union
Corpus Christi, Texas
Address and phone number unknown

PLAINTIFF'S MEDICAL PROVIDERS:

Dr. Roberto Braglia
and/or Custodian of Records
and/or Designated Representatives
714 Booty Street
Corpus Christi, Texas 78404
(361) 888-4441

Dr. Roy J. Hotz, Jr.
and/or Custodian of Records
and/or Designated Representatives
1021 Senator Carlos Truan
Kingsville, Texas 78363
Phone number unknown

Dr. Truman Appel
and/or Custodian of Records
and/or Designated Representatives
1415 3rd Street
Corpus Christi, Texas 78404-0210
(361) 884-4197

Dr. J. Julio Vela
Coastal Bend Diagnostic Medical and
Dental Center
and/or Custodian of Records
and/or Designated Representatives
2201 Cleo, Suite A
Corpus Christi, Texas
(361) 888-4960

Dr. Octavio J. Rodriguez
and/or Custodian of Records
and/or Designated Representatives
1021 Senator Carlos Truan
Kingsville, Texas 78363
(361) 595-5556

Dr. John Arringdale
and/or Custodian of Records
and/or Designated Representatives
1521 South Staples, Suite 604
Corpus Christi, Texas
(361) 887-7474

Dr. Joseph Garcia
and/or Custodian of Records
and/or Designated Representatives
613 Elizabeth Street
Corpus Christi, Texas 78404-0222
(361) 887-2900

Dr. Marty Perez
and/or Custodian of Records
and/or Designated Representatives
613 Elizabeth, Suite 804
Spohn Towers
Corpus Christi, Texas
(361) 884-2875

Dr. Peter A. Petroff
and/or Custodian of Records
and/or Designated Representatives
Santa Rosa Northwest Tower II
2833 Babcock Road, Suite 435
San Antonio, Texas 78229
(210) -614-5855

Dr. Arnaldo Villarreal
Kingsville Medical Center
and/or Custodian of Records
and/or Designated Representatives
1311 General Cavazos
Kingsville, Texas 78363

OR

1521 S. Staples, Suite 204
Corpus Christi, Texas 78404
(361) 882-4584

Dr. Lewis Mandell
and/or Custodian of Records
and/or Designated Representatives
1021 Senator Carlos Truan
Kingsville, Texas 78363
Phone number unknown

Physicians at Spohn Health System
R. Duane Cook, M.D.
and/or Custodian of Records
and/or Designated Representatives
600 Elizabeth Street
Corpus Christi, Texas 78404
(361) 595-1661

Physicians at Spohn Shoreline Hospital
and/or Custodian of Records
and/or Designated Representatives
600 Elizabeth Street
Corpus Christi, Texas 78404
(361) 881-3000

Physicians at Christus Spohn Hospital
Kleberg
and/or Custodian of Records
and/or Designated Representatives
1311 East General Cavazos
Kingsville, Texas 78363
(361) 595-1661

Physicians Bay Area Surgery
and/or Custodian of Records
and/or Designated Representatives
7101 South Padre Island Drive
Corpus Christi, Texas 78412
(361) 985-3500

Physicians at Coastal Cardiology
Associates
Roy Graf, M.D.
Joseph Garcia, M.D.
613 Elizabeth, Suite 402
Corpus Christi, Texas 78404-2289
(361) 887-2900

PLAINTIFF'S FORMER EMPLOYERS:

Lynch Davidson & Co.
and/or Custodian of Records
and/or Designated Representatives
Houston, Texas
Phone number unknown

H.E. Butt Grocery Company
HEB Food Stores
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 839999
San Antonio, Texas 78283-3999
(210) 938-5246

Dairy Products Co.
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 950
Kingsville, Texas
Phone number unknown

Paul Danforth
Kingsville Cotton Mill
and/or Custodian of Records
and/or Designated Representatives
Kingsville, Texas
Address and phone number unknown

Agapito Salinas
El Rancho Café
and/or Custodian of Records
and/or Designated Representatives
1103 N. 9th
Kingsville, Texas 78363
Phone number unknown

R & R Machine, Inc.
and/or Custodian of Records
and/or Designated Representatives
14041 Chrisman Bldg. 6A
Houston, Texas 77039
Phone number unknown

F.W. Jr. & H.C. Heldenfels Ptrs.
Heldenfels Farms Ptr. (n/k/a Heldenfels
Enterprises)
and/or Custodian of Records
and/or Designated Representatives
801 Navigation Blvd.
Corpus Christi, Texas 78408-0260
(361) 883-9334

McDermott Marine Engineering - Houston
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 60035
New Orleans, Louisiana 70160-0035
Phone number unknown

Foster Wheeler Co.
and/or Custodian of Records
and/or Designated Representatives
666 5th Avenue
New York, New York 10103
(212) 713-0574

W. E. Ashley
Ashley & Company
and/or Custodian of Records
and/or Designated Representatives
Box 3384
Corpus Christi, Texas 78404
Phone number unknown

Leslie & Leslie
L & L Construction Co.
and/or Custodian of Records
and/or Designated Representatives
Farm Road 1355
Kingsville, Texas 78363
(361) 592-4801

Arthur Arthur & Arthur
Arthur Brothers
and/or Custodian of Records
and/or Designated Representatives
813 S. 6 St.
Kingsville, Texas 78363
Phone number unknown

J.L. & N.L. Harwell
Harwell & Harwell
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 177
San Antonio, Texas 78206
Phone number unknown

W.S. Marshall
and/or Custodian of Records
and/or Designated Representatives
Route 10 Box 186
San Antonio, Texas 78216
Phone number unknown

WM A. Smith Construction Co.
and/or Custodian of Records
and/or Designated Representatives
301 Gregg Street
Houston, Texas
Phone number unknown

Advisory Commission on State
Emergency Communications Chief
Accountant
and/or Custodian of Records
and/or Designated Representatives
33 Guadalupe Street
Austin, Texas 78701-0393
(512) 305-6911

Mitchell Darby Construction Co.
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 479
Pharr, Texas
Phone number unknown

Victor Ramos Jr.
and/or Custodian of Records
and/or Designated Representatives
326 E. Ella Ave.
Kingsville, Texas 78363
Phone number unknown

Richard A. Malone
Malone Construction Co.
and/or Custodian of Records
and/or Designated Representatives
Corpus Christi, Texas
Phone number unknown

Joseph Hausman
Alice Meat Co.
and/or Custodian of Records
and/or Designated Representatives
501 E. 3 St.
Alice, Texas 78332
Phone number unknown

Carl Vickers
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 1742
Corpus Christi, Texas 78403
Phone number unknown

Joint Seal Engineering Company, Inc.
and/or Custodian of Records
and/or Designated Representatives
215 El Cerrito
San Antonio, Texas 78232
Phone number unknown

Goetz, Goetz & Boldt
William E. Goetz & Sons
and/or Custodian of Records
and/or Designated Representatives
Box 6448
San Antonio, Texas 78209
Phone number unknown

Gravett Electric Company, Inc.
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 5397
5702 S. Staples
Corpus Christi, Texas 78405

Shoreline Maintenance Inc.
and/or Custodian of Records
and/or Designated Representatives
4150 Westheimer Suite 320
Houston, Texas 77027
Phone number unknown

Putnam & Gibson Contractors
William Putnam & Jerry Gibson
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 4
Bishop, Texas 78343
Phone number unknown

R.T. Collins Construction CO.
R.T. & R.W. Collins
and/or Custodian of Records
and/or Designated Representatives
Box 3067
Victoria, Texas 77901
Phone number unknown

BOWCO Construction Co., Inc.
and/or Custodian of Records
and/or Designated Representatives
Box 5426
Corpus Christi, Texas 78405
Phone number unknown

J. M. Counts
Counts Concrete Company
and/or Custodian of Records
and/or Designated Representatives
Box 5404
Corpus Christi, Texas 78400
Phone number unknown

Huppertz Plumbing Co., Inc.
and/or Custodian of Records
and/or Designated Representatives
Box 1306 S. 6 St.
Kingsville, Texas 78363
Phone number unknown

JAR Painting Company, Inc.
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 7417
Corpus Christi, Texas 78467-7417
Phone number unknown

ADT Maintenance Services Inc.
ADT Inc.
and/or Custodian of Records
and/or Designated Representatives
300 Interpace Parkway
Parsippany, New Jersey 07054-1113
Phone number unknown

Texas A&M University - Kingsville
Human Resources
and/or Custodian of Records
and/or Designated Representatives
700 University Blvd.
MSC 107
Kingsville, Texas 78363
(361) 593-3704

PLAINTIFF'S CO-WORKERS:

Earl Elwood Faske
301 South Pasadena Drive
Kingsville, Texas 78363
(512) 592-3897
Product Identification Witness

Charles Remlinger, Jr.
2303 Perryman
Palacios, Texas 77465
(512) 972-3320
Product Identification Witness

Alvino Rosendo Lopez
P.O. Box 644
Robstown, Texas 78380
(361) 387-0419
Product Identification Witness

Antonio Garcia Bayardo
700 North 8th, #95
Robstown, Texas 78380
(512) 767-8215
Product Identification Witness

Clarence Arthur Kennedy
Route 2, Box 133
Davis, Oklahoma 73030
(580) 369-3277
Product Identification Witness

John Henry Seibert
311 Blue Water
Portland, Texas 78374
(361) 643-6406
Product Identification Witness

Romeo Alvarez
1129 Hamilton
Hempstead, Texas 77445
(979) 826-4541

Abraham Garza
10833 Stacy Lane
Corpus Christi, Texas 78410-2933
(361) 241-7159

Futoso Rivera
311 Bolner Lane
Del Rio, Texas 78840-7619
(830) 775-5043

Angel Gonzales
Address and phone number unknown

Santiago De La Paz
904 E. Hoffman Avenue
Kingsville, Texas 78363-6329
(361) 592-1871

Samuel Zendejo
Address and phone number unknown

Antonio Moreno
1818 Bernardino Street
Kingsville, Texas 78416-1413
(361) 855-5569

Anselmo Morales
210 Bluebonnet Drive
Floresville, Texas 78411-3010
(830) 393-3339

or
1825 Mimosa Lane
Plano, Texas 75074-5070
(972) 424-6151

Felix Saenz
Address and phone number unknown

PLAINTIFF'S DESIGNATED EXPERTS:

Dr. Richard Cohen
and/or Custodian of Records
and/or Designated Representatives
19242 Panorama Dr.
Saratoga, CA
(415) 424-5156

Dr. Barry Castleman
and/or Custodian of Records
and/or Designated Representatives
1722 Linden Avenue
Baltimore, MD 21217
(410) 462-5135

Dr. Joseph K. Wagoner
Telephone number and address unknown

Dr. Gerritt Schepers
and/or Custodian of Records
and/or Designated Representatives
6527 Sunny Hill Court
McLean, VA 22101
(703) 790-8616 (Fax)

Dr. David Ozonoff
and/or Custodian of Records
and/or Designated Representatives
Boston University
School of Public Health
Bldg. A-501
80 E. Concorde St.
Boston, MA 02118
(617) 638-4620

Dr. Thomas Mancuso
and/or Custodian of Records
and/or Designated Representatives
5127 Elsworth
Pittsburgh, PA
(412) 683-6321

Dr. David Egilman
and/or Custodian of Records
and/or Designated Representatives
South Shore Health Center
759 Granite Street
Braintree, MA 02184-5328
(617) 848-1950

Dr. David Lilienfeld
and/or Custodian of Records
and/or Designated Representatives
Box 1057
Mt. Sinai School of Medicine
1 Gustave Levy Place
New York, NY 10029-6574
(212) 241-4785

Dr. Robert G. Fraser
and/or Custodian of Records
and/or Designated Representatives
2766 Summit Circle
Birmingham, AL 35216
(205) 979-1123
Padanarum Road
P.O. Box 558
Bolton Landing, NY 12814
(518) 644-2220

Dr. Arthur N. Rohl
and/or Custodian of Records
and/or Designated Representatives
10 Stouts Valley Road
Easton, PA 18042
(610) 258-5965

James E. Girard, Ph.D.
and/or Custodian of Records
and/or Designated Representatives
6328 Karmich St.
Fairfax Station, VA 22039
(703) 425-4770

John D. McCann
and/or Custodian of Records
and/or Designated Representatives
195 Bouffard
LaSalle, Ontario
British Columbia N9J1E9
(519) 734-7889

Roger Shack
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 356
Montevallo, AL 35115
Telephone number unknown

Nathan Fochtmann
and/or Custodian of Records
and/or Designated Representatives
Route 6, Box 49
Montevallo, AL 35115
Telephone number unknown

Dr. John Dement
and/or Custodian of Records
and/or Designated Representatives
109 Kilbreck Drive
Cary, North Carolina 27511
(919) 387-2252

Dr. Richard A. Lemen
and/or Custodian of Records
and/or Designated Representatives
3495 Highgate Hills Drive
Duluth, Georgia 30155
(770) 497-0770

Mr. Alan M. Segrave
Materials Analytical Services, Inc.
and/or Custodian of Records
and/or Designated Representatives
3597 Parkway Lane, Ste. 250
Norcross, GA 30092
(404) 448-3200

Dr. Bill Johnson
and/or Custodian of Records
and/or Designated Representatives
2948 Foxhall Circle
Augusta, GA 30907
(706) 863-4270

E. Lynn Schall
and/or Custodian of Records
and/or Designated Representatives
510 Edgewood Drive
Collingswood, NJ 08108
(609) 858-0003 or
(609) 967-313

Dr. Gerald E. Markowitz
and/or Custodian of Records
and/or Designated Representatives
600 West 111th Street
New York, NY 10025
(212) 237-8458

Mr. George M. Kraus
and/or Custodian of Records
and/or Designated Representatives
11 Drake Lane
Upper Saddle River, NJ 07458
(201) 327-2105

Dr. Christine Oliver
and/or Custodian of Records
and/or Designated Representatives
Pulmonary and Critical Care Unit
Massachusetts General Hospital
Boston, MA 02114
(617) 726-1721

Dr. Edwin C. Holstein
and/or Custodian of Records
and/or Designated Representatives
Environmental Health Associates, P.A.
20 Park Plaza, Ste. 1028
Boston, MA 02116
(617) 357-4901

Stephen Berger
and/or Custodian of Records
and/or Designated Representatives
10564 Eastborne Ave.
Los Angeles, CA 90024
Telephone number unknown

Dr. Gaeton D. Lorino
and/or Custodian of Records
and/or Designated Representatives
6701 Airport Blvd., Ste. A-101
Mobile, AL 36609
(334) 633-8880

Dr. Steven Levin
and/or Custodian of Records
and/or Designated Representatives
Department of Environmental Medicine
Mt. Sinai Medical School
One Gustave Levy Place
New York, NY
(212) 241-7810

Dr. Mark Clark
and/or Custodian of Records
and/or Designated Representatives
Pulmonary & Critical Care Consultants
1305 West 34th Street, Ste. 400
Austin, TX 78705
(512) 459-6599

Dr. James Ballard
and/or Custodian of Records
and/or Designated Representatives
Princeton Diagnostic
817 Princeton Avenue
Birmingham, AL
(205) 783-3700

Dr. Steven Dikman
and/or Custodian of Records
and/or Designated Representatives
One Gustave Place
Annenberg Bldg. 15/58
Department of Pathology
New York, NY 10029
(212) 241-7343
(212) 241-8014

Dr. Eugene Mark
and/or Custodian of Records
and/or Designated Representatives
Massachusetts General Hospital
Department of Pathology
32 Fruit Street, Warren II
Boston, MA
(617) 726-8891

Dr. Martin Lewis
and/or Custodian of Records
and/or Designated Representatives
Palms of Pasadena Hospital
1501 Pasadena Avenue South
St. Petersburg, FL
(813) 341-7505

Dr. David H. Groth
and/or Custodian of Records
and/or Designated Representatives
8953-C Harper Points Drive
Cincinnati, OH 45249
(513) 489-6351

Dr. Jerrold Abraham
and/or Custodian of Records
and/or Designated Representatives
Department of Pathology
State University of New York
750 East Adams Street
Syracuse, NY 13210
(315) 464-4750

Dr. Sam Hammar
and/or Custodian of Records
and/or Designated Representatives
Diagnostic Specialties Laboratory
700 Lebo Blvd.
P.O. Box 2171
Bremerton, WA 98310
(206) 479-7707

Dr. Victor Roggli
and/or Custodian of Records
and/or Designated Representatives
Durham VA Medical Center
Department of Pathology (113)
508 Fulton Street, F3196
Durham, NC 27705
(919) 286-0411

Mr. John D. McAllister, deceased (By deposition)

Dr. Kenneth Wallace Smith, deceased
(by Deposition)

Dr. Richard Gaze, deceased
(by Deposition)

Dr. Robert W. Johnson
and/or Custodian of Records
and/or Designated Representatives
4970 El Camino Real, Ste. 250
Los Altos, CA 94022
(415) 494-2413

Mr. Richard L. Hatfield
and/or Custodian of Records
and/or Designated Representatives
Materials Analytical Services
3945 Lakefield Court
Suwanee, Georgia 30024
(770) 448-3200

Maceo Cook
and/or Custodian of Records
and/or Designated Representatives
1070 Legion Club Road
Salisbury, NC 28144
(704) 279-3089

Reverend Louis Turner
and/or Custodian of Records
and/or Designated Representatives
406 Pine Tree Drive
Salisbury, NC 28144
(704) 636-9558

Charles E. Evans, Jr.
and/or Custodian of Records
and/or Designated Representatives
P.O. Box 568
East Spencer, NC 28039-0568
Telephone number unknown

Edward Allebach
and/or Custodian of Records
and/or Designated Representatives
109 Emerald Avenue
Westmont, NJ
(609) 854-9120

Dr. Elliott Kagan
and/or Custodian of Records
and/or Designated Representatives
Department of Pathology
Uniformed Services University
of the Health Sciences
F. Edward Hebert School of Medicine
4301 Jones Bridge Road
Bethesda, MD 20814-4799
(301) 295-3492

Scott R. Bickford
Martzell & Bickford
and/or Custodian of Records
and/or Designated Representatives
338 Lafayette Street
New Orleans, LA 70130
(504) 581-9065

Willie Fields
and/or Custodian of Records
and/or Designated Representatives
4239 South Claiborne Street
New Orleans, LA 70118
(504) 891-5544

Arnold R. Brody, Ph.D.
Tulane University Medical Center
School of Medicine
Department of Pathology & Laboratory
Medicine SL79
and/or Custodian of Records
and/or Designated Representatives
1430 Tulane Avenue
New Orleans, LA 70112-2699
(504) 588-5224

Thomas Adkins
and/or Custodian of Records
and/or Designated Representatives
38252 River Drive
Lebanon, OR 97355
(503) 258-2147

William Longo, Ph.D.
Materials Analytical Services
and/or Custodian of Records
and/or Designated Representatives
3945 Lakefield Court
Suwanee, Georgia 30024
(770) 448-3200

James Hubbard
Senior Materials Scientist
Materials Analytical Services
and/or Custodian of Records
and/or Designated Representatives
3597 Parkway Lane
Norcross, GA 30092
(770) 448-3200

Dr. Dominic Gaziano
and/or Custodian of Records
and/or Designated Representatives
Chest Medical Services, Inc.
3100 MacCorkle Avenue, Southeast
Suite 404
Charleston, WV 25304
(304) 346-1811

Dr. Brian G. Forrester
Director, Occupational Medicine
Regional FirstCare
and/or Custodian of Records
and/or Designated Representatives
485 Highway 29N
Athens, Georgia 30601
(706) 353-6000

Dr. Frank Mazza
Pulmonary & Critical Care Consultants
and/or Custodian of Records
and/or Designated Representatives
1305 West 34th Street, Suite 400
Austin, Texas 78705
(512) 459-6599

Dr. Jay Segarra
and/or Custodian of Records
and/or Designated Representatives
414 Ward Avenue
Ocean Springs, Mississippi 39564
(228) 875-2954

Dr. Peter A. Petroff
and/or Custodian of Records
and/or Designated Representatives
Santa Rosa Northwest Tower II
2833 Babcock Road, Suite 435
San Antonio, Texas 78229
(210) 614-6378

**DEFENDANTS CNA HOLDINGS, INC.
AND CELANESE LTD.'S DESIGNATED
EXPERTS:**

J. LeRoy Balzer, Ph.D.
408 Horse Trail Court
Alamo, California 94507
(925) 274-0826

Lawrence R. Birkner, CIH, CSP
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, California 91362-1822
(805) 494-8173

James D. Crapo, M.D.
National Jewish Medical Research Center
1400 Jackson Street
Denver, Colorado 80206
(303) 398-1436

Dorsett D. Smith, M.D.
4310 Colby Avenue, Suite 201
Everett, Washington 98203
(425) 259-5171

Mark R. Stenzel, CIH
P.O. Box 850235
Richardson, Texas 75085-0235
(972) 404-3207

Ernest M. Dixon, M.D., Sc.D.
6305 Evermay Drive
McLean, Virginia 22101

Charles S. Laubly
2225 North Tucson Boulevard
Tucson, Arizona 85716

Herbert J. Kolodner, Ph.D., P.E.
777 Pebble Beach Drive
Crescent City, California 95331-3634

Carrol W. Whaley, CIH, CSP
3403 Yerba Buena Road
San Jose, California 95135

William L. Dyson, Ph.D., C.I.H.
Workplace Hygiene, LLC
1022 Jefferson Road
Greensboro, North Carolina 27140

William G. Hughson, M.D., Ph.D.
Center for Occupational and
Environmental Medicine
UCSD Medical Center
200 West Arbor Drive
San Diego, California 92103-8800

Peter J. Barrett, M.D.
300 Boylston Street, Suite 714
Boston, Massachusetts 02116-3923

John R. Holcomb, M.D.
4410 Medical Drive
San Antonio, Texas 78229-0373
(210) 692-9400

**DEFENDANTS CNA HOLDINGS, INC.
AND CELANESE LTD.'S FACT
WITNESSES:**

Lawrence Birkner, CIH, CSP
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, California 91362-1822
(805) 494-8173
See Defendant Celanese Ltd.'s
Designation of Expert Witnesses for a
summary of Mr. Birkner's areas of
knowledge.

T. Rogers Shandley
234 Turpin Drive
Lewisville, Texas 7507
Knowledge regarding purchase of
asbestos-containing materials by
Celanese and the Bishop plant and the
discontinuation thereof.

James Jackson
1117 Clarion
Corpus Christi, Texas 78412

Ann Rethersford
P.O. Box 428
Bishop, Texas 78343

James Pritchard
P.O. Box 428
Bishop, Texas 78343

Messrs. Jackson & Pritchard and Ms.
Rethersford have knowledge regarding
asbestos-related safety and industrial
hygiene programs in relation to
Celanese's Bishop plant.

Kenneth Hajek
Highway 77 South
Bishop, Texas 78343
(361) 584-6561

Knowledge regarding interface between
Celanese and independent contractors
and the monitoring of them at Celanese's
Bishop plant.

Mark R. Stenzel, CIH
P.O. Box 850235
Richardson, Texas 75085-0235

Ernest M. Dixon, M.D., Sc.D.
6305 Evermay Drive
McLean, Virginia 22101

Charles S. Laubly
2225 North Tucson Boulevard
Tucson, Arizona 85716

Herbert J. Kolodner, Ph.D., P.E.
777 Pebble Beach Drive
Crescent City, California 95331-3634

Carrol W. Whaley, CIH, CSP
3403 Yerba Buena Road
San Jose, California 95135

See Defendant Celanese Ltd.'s
Designation of Expert Witnesses for a
summary of Messrs. Dixon, Laubly,
Stenzel, Kolodner and Whaley's areas of
knowledge.

THURMAN HARMON, et al.,

Plaintiffs,

vs.

OWENS CORNING (a/k/a OWENS
CORNING CORPORATION), et al.,

Defendants.

§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

298TH JUDICIAL DISTRICT

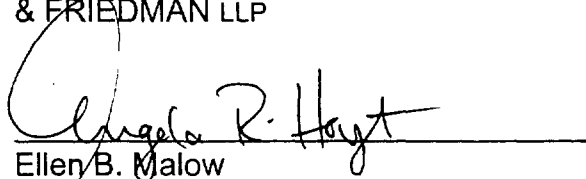
**DEFENDANT CELANESE LTD.'S
CERTIFICATE OF DISCOVERY**

I, Angela R. Hoyt, counsel for Defendant Celanese Ltd., certify that on this the 01
day of December, 2000, I served the following discovery by certified mail, return receipt
requested, on the respective attorneys of record for Plaintiffs:

1. Defendant Celanese Ltd.'s First Supplemental Response to Plaintiff's Requests for Disclosure; and
2. Defendant Celanese Ltd.'s First Supplemental Responses to Plaintiff Fidencio Orta Sanchez's First Set of Interrogatories, Request for Production and Request for Admissions.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP



Ellen B. Malow

State Bar No. 12888280

Angela R. Hoyt

State Bar No. 00796783

700 Louisiana Street, Suite 2200

Houston, Texas 77002-2730

(713) 220-8800

(713) 222-0843 (Facsimile)

HAWKINS & PARNELL

Michael E. Hutchins
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308
(404) 614-7400
(404) 614-7500 (Facsimile)

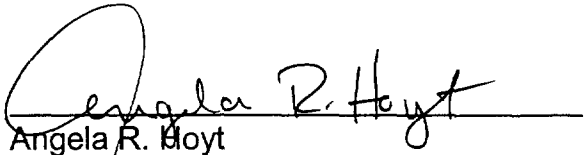
ATTORNEYS FOR DEFENDANT
CELANESE LTD.

OF COUNSEL:

Marc E. Kasowitz
Hector Torres
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
1633 Broadway
New York, New York 10019
(212) 506-1700
(212) 506-1800 (Facsimile)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via United States certified mail, return receipt requested, on counsel for plaintiffs on this 8th day of December, 2000.


Angela R. Hoyt

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

700 LOUISIANA STREET, SUITE 2200

HOUSTON, TEXAS 77002

713-220-8800

FACSIMILE: 713-222-0843

WRITER'S DIRECT DIAL NUMBER

(713) 220-8817

1633 BROADWAY
NEW YORK, NEW YORK 10019
212-506-1700

ONE GATEWAY CENTER
NEWARK, NEW JERSEY 07102
973-645-9462

December 8, 2000

**VIA CERTIFIED MAIL –
RETURN RECEIPT REQUESTED**

Mr. Jim Hamlin
Dallas County District Clerk
1st Floor, George L. Allen, Sr. Courts Bldg.
600 Commerce Street
Dallas, Texas 75202-4606

Re: No. 99-06508-M; *Thurman Harmon, et al. v. Owens Corning, et al.*; In
the 298th Judicial District Court of Dallas County, Texas

Dear Mr. Hamlin:

Enclosed for filing in the above-referenced matter is an original and one copy of **Defendant Celanese Ltd.'s Certificate of Discovery** pertaining to: 1) Celanese Ltd.'s First Supplemental Response to Plaintiff's Requests for Disclosure; and 2) Celanese Ltd.'s First Supplemental Responses to Plaintiff Fidencio Orta Sanchez's First Set of Interrogatories, Request for Production, and Request for Admissions.

Please acknowledge filing of the above Certificate of Discovery by placing your file stamp on the copy provided and returning it to me in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this matter.

Very truly yours,


Angela R. Hoyt

ARH/ile
Enclosures

cc: Counsel of Record

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Mr. Jerry Deere
Brazoria County District Clerk
December 8, 2000
Page 2

bcc: Paul J. Zoeller
Michael E. Hutchins
Larry Poling

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Mr. Jerry Deere
Brazoria County District Clerk
December 8, 2000
Page 3

bcc: Marc E. Kasowitz
Hector Torres
Ellen B. Malow