PLAINTIFF'S EXHIBIT

ARCO-67

CAUSE NO. 00-04771-B

ERNEST HILL WHITESIDE , ET AL,	§	**IN THE DISTRICT COURT OF**
	§	
Plaintiffs,	§	
	§	
VS.	§	**DALLAS COUNTY, TEXAS**
	§	
GAF CORPORATION, ET AL	§	
	§	
Defendants.	§	**44TH JUDICIAL DISTRICT**

DEFENDANT ATLANTIC RICHFIELD COMPANY, INC.'S FIRST SUPPLEMENTAL DESIGNATION OF FACT AND EXPERT WITNESSES AND RESPONSES TO PLAINTIFF ERNEST HILL WHITESIDE'S REQUESTS FOR DISCLOSURE

TO: All Plaintiffs asserting claims against Atlantic Richfield Company (Individually and as Successor-in-Interest to Sinclair Oil Corporation) by and through their attorneys of record, D. Leanne Jackson, Baron & Budd, P.C., The Centrum, Suite 1100, 3102 Oak Lawn Avenue, Dallas, Texas 75219.

ATLANTIC RICHFIELD COMPANY ("ARCO"), pursuant to Texas Rule of Civil Procedure 194, files its Responses to Plaintiff Ernest Hill Whiteside's Requests for Disclosure. Defendant's Responses are being made for the purpose of this pending action only, remain subject to Arco's Motion to Transfer Venue, and are attached hereto.

Respectfully submitted,

R. Bruce Hurley
State Bar No. 10311400
Robert E. Meadows
State Bar No. 13885700
KING & SPALDING
1100 Louisiana, Suite 3300
Houston, Texas 77002-5219
Tel: 713/751-3200
Fax: 713/751-3290

HAWKINS & PARNELL, L.L.P.
Albert H. Parnell
State Bar No. 00789876
4000 Suntrust Plaza
303 Peachtree Street, NE
Atlanta, Georgia 30308-3243

ATTORNEYS FOR DEFENDANT
ATLANTIC RICHFIELD COMPANY

CERTIFICATE OF SERVICE

I certify that on this 22nd day of June, 2001, a true and correct copy of the foregoing has been served via facsimile and/or U.S. mail and/or certified mail, return receipt requested, to:

D. Leanne Jackson
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

With a copy of the filing letter to all known counsel of record.

R. Bruce Hurley

RESPONSES TO REQUESTS FOR DISCLOSURE

(a) Correct Names of the Parties to the Lawsuit:

(1) Ernest Hill Whiteside (deceased) and Margie Lois Whiteside Plaintiffs with Claims against Atlantic Richfield Company (Individually and As Successor In Interest to Sinclair Oil Corporation).

(2) Atlantic Richfield Company ("ARCO") (Individually and As Successor In Interest to Sinclair Oil Corporation)

(3) Defendant ARCO is unable to state the correct names of other Plaintiffs and/or Defendants to this lawsuit, but hereby incorporates each of these parties' responses in its response and reserves the right to supplement this information to the extent such information is available.

(b) Name, address, and telephone number of any potential parties:

ARCO is unaware at this time of any potential parties that have not already been named in this action, but will supplement to the extent such information is available.

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

ARCO hereby incorporates by reference its Original Answer, subject to Motion to Transfer Venue and its Motion to Transfer Venue. Specific defenses asserted and relied upon by ARCO include: improper joinder of Plaintiffs (violations of due process of the United States and Texas Constitutions), improper venue, statute of limitations, laches, Texas Worker's Compensation Statute bars, failure to mitigate, no duty, no breach of duty, no proximate cause, assumption of the risk, comparative negligence and/or negligence per se of the contractor, unknown causes, unavoidable accident, new, independent and intervening cause, third party liability, sole proximate cause, unconstitutionality of punitive/exemplary damages awards under the Texas and United States Constitutions, Chapter 41 Texas Civil Practice and Remedies Code

regarding limitations on punitive damages, contribution and/or indemnity, comparative fault/ negligence, offset, and no joint and several liability.

(d) Amount and any method of calculating economic damages:

At this time, Premises Defendant, ARCO has not asserted any counterclaims or cross claims in this action and is not seeking economic damages. However, ARCO has asserted contribution and/or indemnity and intends to pursue any amounts as contribution and/or indemnity which ARCO may be found liable to Plaintiff, in whole or in part, as a result of the negligence or fault of a third party/Defendant. Defendant will also be seeking an offset of any amounts alleged by the Plaintiff Whiteside for Plaintiff's comparative negligence or fault.

(e) 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:

From 1945 until 1966, Sinclair, Atlantic, and Richfield each employed doctors and medical personnel at various facilities. The precise duties of these people depended on the facility at which they worked. The remaining records do not list the names and addresses of each of these individuals, some of whom were independent contractors in private practice. The following names and addresses are based on current information, and this information may be supplemented as further information is developed. The information available at this time is divided into the following sections:

A) Individuals with knowledge of relevant facts concerning ARCO's corporate medical department;
B) Individuals with knowledge of relevant facts concerning respiratory protection at the corporate level and at the subject premises;
C) Individuals with knowledge of relevant facts at the corporate level, generally;
D) Individuals with knowledge of relevant facts concerning the Channelview North plant; and
E) Individuals with knowledge of relevant facts concerning the Bayport Plant.

A) Individuals with knowledge of relevant facts concerning ARCO's corporate medical department:

1. Dr. Melvin Plancey
630 Arbolada Drive
Arcadia, CA 91006

2. Dr. Robert H. Lang
P.O. Box 496
Chincoteague, VA 23336

3. Kern Linder (deceased)

4. Menard M. Gertler, M.D.
Whereabouts unknown

B. Individuals with knowledge of relevant facts concerning respiratory protection at the corporate level and at the subject premises:

1. James M. Bachman - may be contacted through counsel.
2. Lawrence R. Birkner - may be contacted through counsel.
3. Joe H. Wheat - 4900 Burning Tree Drive, Baytown, TX 77521, (713) 424-7838.
4. Keith Hyde - 490 Park Street, Beaumont, TX 77704, (409) 835-6000.
5. Joseph C. Luspin - 609 Chedworth, Houston, TX 77062.
6. William Howard - 188 Wick Willow, Montgomery, TX 77356, (409) 597-5958.
7. M. Scott, Jr. - may be contacted through counsel.
8. Dewey Norris - address unknown.
9. Don F. Jenkins - may be contacted through counsel.
10. Jerry Tom Maxwell - may be contacted through counsel.

C. Individuals with knowledge of relevant facts at the corporate level, generally:

1. James M. Bachman - may be contacted through counsel
2. Lawrence R. Birkner - may be contacted through counsel
3. Dr. Melvin Plancey
630 Arbolada Drive
Arcadia, CA 91006
4. Dr. Robert H. Lang
P.O. Box 496
Chincoteague, VA 23336
5. Kern Linder (deceased)
6. William G. Eissler - may be contacted through counsel
7. Donald F. Wilson (deceased)
8. MacGregor Scott - may be contacted through counsel
9. Dewey Norris - address unknown
10. Menard M. Gertler, M.D. - address unknown

D. Individuals with knowledge of relevant facts concerning the Channelview North Plant:

1. Joe H. Wheat

4900 Burning Tree Drive
Baytown, TX 77521
(713) 424-7838

2. Keith Hyde
490 Park Street
Beaumont, TX 777704
(409) 835-6000

3. Jerry Tom Maxwell
May be contacted through counsel

4. Don F. Jenkins
May be contacted through counsel

E. <u>Individuals having knowledge of relevant facts concerning the Bayport Plant:</u>

1. Jim Horn
3007 Michaelis Lane
Baytown, TX 77521

2. Lucas Brandt
Grace Chemical Company
739 Battleground Road
Deer Park, TX 77536

3. Hilary Kemp
P.O. Box 133
Manuel, TX 77578

4. Bill Leger (address unknown)

5. Sylvester Fretwell
289 Brookside Avenue
Wyekoff, NJ 07481

6. William Howard
188 Wick Willow
Montgomery, TX 77356
(409) 597-5958

7. Bill Browning
11504 Hughes Road, Suite 135
Houston, TX 77089

8. Bobby G. Johnson
110 Spring Lake
Montgomery, TX 77356
(409) 447-6458

(f) **Testifying Experts:**

(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; and
(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) expert's current resume and bibliography.

RESPONSE:

Please see Exhibit A, attached hereto. ARCO will supplement resumes/bibliographies for designated experts in documents produced.

(g) **Any indemnity and insuring agreements described in Rule 192.3(f):**

Plaintiff Ernest Hill Whiteside has failed to provide sufficient information from which ARCO could determine the specific policy or policies of insurance which may provide coverage relative to the time periods, products, and/or occurrences alleged by Plaintiff or which may otherwise underlie Plaintiff's purported claims in this action. Accordingly, ARCO is unable at this time to respond to this request. Will supplement to the extent further information reveals that such coverage exists.

(h) **Any settlement Agreements described in Rule 192.3(g):**

None. Will supplement to the extent such information becomes available.

(i) **Any Witnesses statement described in Rule 192.3(h):**

None. Will supplement to the extent such information becomes available.

(j) **In a suit alleging physical or mental injury and damages from the occurrences 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:**

Will supplement to the extent such information is obtained.

(k) **In a suit alleging physical or mental injury and damages from the occurrences 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:**

Will supplement to the extent such information is obtained.

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EXHIBIT "A"

Alan A. Muse
Tim Manning
Bill Box
Kandy Beckner
Leo Brown
James Richey
Owen Rhuman
Julian Hood
Edward Atteberry
Joe Blake
Frank McKay
Samuel J. Kniffen
"Doc" Cumbie
Ralph Chalfant
Al Gradzial
Naldo Pierpoline
Karl Hickey
Eric Anderson
Harry Broadbent
Victor Young
Jim Brown
Bill Holliday
Gerald Hill
c/o R. Bruce Hurley
King & Spalding
1100 Louisiana, Suite 3300
Houston, Texas 77002
713/751-3200

The above listed witnesses may have relevant knowledge concerning the exposure alleged by the Plaintiffs in this case. The above are current and/or former employees of Defendants.

Defendant designates any and all fact witnesses previously or subsequently designated by plaintiffs and any other defendant. In addition, any fact witnesses designated by any other party, including medical doctors who have seen or examined the plaintiff(s) at the request of one or more parties to this lawsuit.

Defendant specifically reserves the right to call, either in its case in chief or in rebuttal in the trial of this cause of action, any and all fact witnesses designated by any other party to this lawsuit, whether or not any such parties who are defendants or third-party defendants, have settled at the time of trial.

Defendant reserves the right to elicit by cross-examination opinion testimony from fact witnesses designated and called by other parties to this lawsuit and, in that regard, defendant hereby

incorporates herein, for all purposes, all designations of fact witnesses of the other parties to this lawsuit.

Defendant reserves the right to designate each and every one of Plaintiff(s) employers, supervisors, foremen and co-workers who have knowledge of facts relevant to the incident made the basis of this lawsuit.

Defendant reserves the right to call or examine any of the adverse witnesses designated or named by the plaintiffs or any other party to this litigation.

EXHIBIT A

DEFENDANT'S DESIGNATION OF WITNESSES

Defendant is not aware of all of the areas of testimony or proof that Plaintiffs intend to produce at trial, and therefore, Defendant cannot proffer all expected testimony until it has had the benefit of reviewing all of Plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, Defendant reserves the right to supplement this statement.

The Defendant reserves the right to seasonably supplement the following witness designation as discovery progresses in these cases, and to utilize additional witnesses, exhibits and/or deposition designations in rebuttal to evidence offered by the Plaintiffs at trial.

The Defendant also adopts and reserves the right to call any witness, use any deposition transcript, or utilize any exhibit designated or listed by any other party to this action, whether Plaintiffs or Defendants. This Defendant adopts and reserves the right to call any and all witnesses listed by any other party to this action, whether Plaintiffs or Defendants.

This Defendant reserves the right to amend the opinions which these witnesses will offer after determining the opinion of Plaintiffs' experts and after Plaintiffs specifically identify the products and times at which Plaintiffs were exposed to said products.

1. Dr. Oscar Auerbach, Deceased, by deposition

Dr. Auerbach will not testify in person. Dr. Auerbach testifies generally about pathology, asbestos-related diseases, diseases related to cigarette smoking, and other matters of pulmonary pathology. Dr. Auerbach testifies regarding the "state-of-the-art" of cigarette smoking and its relationship to disease as well as other areas of pulmonary pathology.

2. Dr. Andrew Churg
Associate Professor
Chief, Laboratory of Anatomic Pathology
University of British Columbia
Health Sciences Center Hospital
2211 Westbrook Mall
Vancouver, B.C., Canada V6T1W5

Dr. Churg will testify about the pathology of asbestos related diseases, his research into asbestos related diseases, the carcinogenicity of various fiber types, and the relationship, if any, between asbestos and various diseases.

Dr. Churg is a specialist in the pathology of occupational lung disease.

He is also expected to testify that some asbestos-containing products do not create a health hazard and that any asbestos exposure from these products played no role in the genesis of plaintiffs' lung diseases, if any.

Dr. Churg may testify, either live or by deposition, regarding general pathology and the pathology of plaintiffs. He may also testify as to any matter raised by experts called by plaintiffs or any co-defendants.

In addition, Dr. Churg may testify regarding general medical issues, including but not limited to the following:

1. the anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regards to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems;

2. the nature of asbestos and asbestos-related disease;

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 with other non-asbestos-related diseases;

7. incidence of lung cancer among individuals with asbestosis or asbestos exposure as compared to non-asbestotic asbestos workers, non-asbestos exposed workers and to the general population;

8. cigarette smoking and its effects on the lungs and other organs;

9. the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect;

10. the difference between impairment and disability;

11. the effect of asbestosis or other asbestos-related disease, or asbestos exposure without asbestosis or other asbestos-related disease, on disability and life expectancy;

12. the lack of relationship between the presence of pleural plaques and a later development of any form of cancer;

13. the history of evolution and knowledge of asbestos-related diseases;

14. the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types and the cause of mesothelioma;

17. to the extent not covered above, asbestos medicine in general.

Dr. Churg will express his opinion that the only established association concerning lung cancers and asbestos exposure is the association of asbestosis and lung cancers; that the association of occupational asbestos exposure and lung cancers is really the association of the specific disease, asbestosis and lung cancers; that only the confirmed presence of asbestosis establishes asbestos as a contributing cause of lung cancers in a person with a significant

smoking history; that absent asbestosis, asbestos does not cause an increased risk of lung cancers. Dr. Churg may testify that occupational exposure to asbestos without a confirmed diagnosis of asbestosis provides no information about the cause of lung cancers and is not information supporting a conclusion that asbestos was a contributing factor in lung cancer. Dr. Churg may testify that pleural plaques, fiber burden counts and asbestos bodies also provide no information about the cause of lung cancers. Dr. Churg may testify as to what is asbestosis, whether there is an asbestos exposure threshold for asbestosis, what constitutes that threshold for asbestosis.

3. Dr. Edward A. Gaensler
63 Eucalyptus Knoll Road
Mill Valley, CA 94941

Dr. Gaensler will testify about the pathology of asbestos related diseases, his research into asbestos related diseases, the carcinogenicity of various fiber types, and the relationship, if any, between asbestos and various diseases. Dr. Gaensler will testify about the epidemiology of asbestos related diseases, his statistical research, latency, state-of-the-art, and other related matters. Dr. Gaensler will testify about case specific testimony, where applicable. He will testify about the evolution of asbestos disease, cigarette related diseases, and other respiratory or systemic conditions, specifically carcinomas, seen either independently or in connection with either of the foregoing.

4. Dr. Forde McIver, Deceased, by deposition

Dr. McIver, Deceased, was a pathologist in Charleston, South Carolina, who will testify by videotape.

5. Dr. W.K.C. Morgan
Chest Diseases Unit
University Hospital
339 Windermere Road

P.O. Box 5339, Postal Station A
London, Ontario N6A 5A5

Dr. Morgan is a pulmonologist. He will testify about the evolution of asbestos disease, the diseases involving cigarette smoking, and other diseases which are often seen in association with either of the foregoing.

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 Occupational Health and Safety Resource Centre at the University of Western Ontario.

Dr. Morgan may testify live or by deposition concerning the state of the available knowledge regarding asbestos-related disease at the relevant historical periods of time. Dr. Morgan may also testify concerning current medical knowledge regarding plaintiff's condition and asbestos-related disease.

6. Hans Weill, M.D.
Tulane University School of Medicine
1700 Perdido Street
Second Floor
New Orleans, Louisiana 70112

Dr. Weill is a pulmonary specialist. Dr. Weill will testify generally about asbestos-related diseases and diseases of the lungs, chest, respiratory system and other organs of the body. He may offer general testimony relating to cigarette smoking, cancer of various organs, cancer risks associated with cigarette smoking, asbestos exposure and other causative factors, and the pathogenesis and diagnosis of disease, including asbestos-related diseases. Dr. Weill may testify as to the various types of asbestos fibers and their role in the causation of disease. He may also testify as to state-of-the-art medical as it relates to knowledge of health hazards associated with exposure to asbestos-containing dust in varying doses and in varying industries, based on his

review of asbestos-related literature, and his own experience. Dr. Weill may testify specifically about plaintiffs' medical condition by relating these general principles to plaintiffs' or plaintiffs' decedents' specific medical history through review of records, x-rays, or by hypothetical.

Dr. Hans Weill may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos 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 plaques, 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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. With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs.

Dr. Weill's testimony will be based on his training, experience, education, and review of the medical literature concerning asbestos related disease.

7. Dr. William Weiss
3912 Netherfield Road
Philadelphia, Pennsylvania 19129

Dr. William Weiss is expected to testify about the evolution of asbestos disease, his knowledge of pulmonary lung disease of all varieties, the "state-of-the-art" of the development of knowledge regarding cigarettes and disease, the relationship between cigarette smoking and pulmonary fibrosis, the nature and evolution of x-ray work, his knowledge of x-rays as a "B" reader and related matters.

8. Dr. Peter Barrett
Chief of Radiology
Quincy City Hospital
Quincy, MA 02169

Dr. Barrett is a radiologist/B-Reader. He is expected to testify generally about radiologic concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis.

He is expected to testify generally about radiologic concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis. Dr. Barrett will testify that some asbestos-containing products are not hazardous and that any possible asbestos exposure from such asbestos-containing products could not have caused any of the plaintiffs' alleged illnesses.

Dr. Barrett is a practicing radiologist and a B-reader certified by NIOSH. His testimony will relate to his interpretation of chest films taken of the plaintiffs, as disclosed in reports produced, if any, and will be made available to the plaintiffs. It is anticipated that Dr. Barrett will testify generally as to his interpretation of the plaintiffs' chest films, the presence of any asbestos-related condition as evidenced on the chest film, and the presence of other abnormalities or conditions unrelated to any exposure to asbestos.

9. Dr. Darryl Carter

Yale University
Department of Pathology
310 Cedar Street
New Haven, CT 06510

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Carter has not prepared a report as yet; if he does, a copy will be provided to plaintiffs.

Dr. Carter is expected to be able to testify concerning the circumstances under which exposure to certain forms and types of asbestos may be associated with the incidence of some forms of mesothelioma in some persons, and will testify concerning the results of his own experiences, the medical and scientific literature, and existing epidemiologic studies concerning associations that are alleged to exist epidemiologically between exposure to asbestos in some populations and the mortality and/or incidence of some forms of cancer.

Dr. Carter is further expected to offer testimony concerning the effects of inhaled tobacco smoke and other factors on the occurrence of disease in populations who are also alleged to be exposed to asbestos containing products, and additionally concerning how the effects of inhaled tobacco smoke and other factors can confound the apparent results of certain epidemiologic studies.

Dr. Carter is expected to testify that it cannot be said, to a reasonable degree of medical probability, that any hypothetical person's alleged "exposure" to products that may have contained asbestos was of importance to that individual, without reference to that specific person's individual work history, medical history, findings on physical examination and pathological examination of tissue, if any, information concerning the individual's use of protective equipment, specific types of asbestos containing product(s) used and/or handled,

resolution of questions regarding exposures to substances other than asbestos-containing products, and other known etiologies for whatever conditions are found to exist.

It is further expected that Dr. Carter's testimony will generally respond to the pathologic, scientific and epidemiologic testimony which may be offered by plaintiffs' experts, and in that sense his testimony is dependent upon the prior testimony of such experts and cannot be specifically predicted.

In expressing his opinions, Dr. Carter will rely on his own training, education, experience, research and publications, as well as the published medical and scientific literature that has been available to him over his career.

Dr. Carter may testify as to the general medical aspects of the diagnosis and treatment of asbestos-related disease and the pathological effect of asbestos on the lung. He may also testify as to the relationship of asbestos exposure and the incidences of cancer. Dr. Carter 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 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 importance 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 this defendant's asbestos-containing products;

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

12. difference between impairment and disability;

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

14. the lack of a relationship between presence of pleural plaques and a later development of any form of cancer;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the history of evolution and knowledge of asbestos-related diseases;

17. the fiber types and exposure levels considered to be substantial in causing asbestos-related disease, specifically mesothelioma.

Additionally, Dr. Carter may testify concerning the diagnosis of the plaintiffs. Dr. Carter may also testify as to his findings and diagnosis after examination and analysis of tissue, slides or other pathologic materials, medical records, reports, radiographs and plaintiffs' work history. He may give testimony concerning his review of any report purported to be diagnostic of any oncological conditions and the methods of and procedures for conducting fiber counts. He may give testimony regarding malignancies associated with asbestos exposure or cigarette abuse and other malignancies from which they must be differentiated, the appropriate protocols for

diagnosis of those conditions, prognosis and information relating to the known causes of those malignancies. He may testify concerning the texts and other literature relevant to any malignancy purported to be asbestos-related and any other malignancy from which it must be distinguished, including data relevant to contentions of increased risk of asbestos-related disease or cancer, prognosis, the relevant standards of care and considerations relating to medical monitoring. His testimony may include discussion of any relevant epidemiology, anatomy and physiology.

10. Dr. John E. Craighead
Department of Pathology
University of Vermont
Burlington, Vermont 05405

Dr. Craighead is a pathologist at the University of Vermont. 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. Craighead will 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. Craighead 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. affect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;

14. affect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

11. Dr. Richard Fraser
Montreal Chest Hospital Center
Department of Pathology
3650 St. Urbain
Montreal, Quebec H2X2P4

Dr. Fraser is a pulmonary pathologist. He has written extensively on the pathology of chest diseases. He is expected to testify generally about pathologic concepts of disease, the

etiology and course of disease processes both related to asbestos and non-asbestos causes. He will also testify case specifically on his analysis of tissue samples and medical records.

12. Dr. Bernard Gee
Yale University School of Medicine
333 Cedar Street
P.O. Box 3333
New Haven, CT 06510

Dr. Bernard Gee is a board certified pulmonologist who is expected to testify generally about the wide range of pulmonary diseases and specifically about occupational lung disease. Dr. Gee will testify regarding his vast research in pulmonology which has promulgated some 200 papers, abstracts, and chapters in textbooks on pulmonary medicine.

13. Dr. S. Donald Greenberg
Professor of Pathology
Baylor College of Medicine
Houston, TX 77030

Dr. Greenberg is a professor of pathology at the Baylor College of Medicine in Houston, Texas. Included in his field of scientific interests are occupational lung diseases, and he has made over 250 presentations concerning pathology, and has authored or co-authored over 200 publications including those regarding asbestos-associated lung disease. His opinion holds that there may be alternative causation of malignant mesothelioma other than asbestos, and he is expected to testify accordingly.

14. Dr. Michael Henderson
330 Rittiman Road
San Antonio, TX 78209-2861

Dr. Henderson is a board certified oncologist. He will testify to general concepts regarding carcinogenesis, specifically in relation to asbestos and its alleged association with different forms of cancer.

15. Dr. William G. Hughson

UCSD Center for Occupational &
Environmental Medicine
3500 Fifth Ave., Ste. 102
San Diego, CA 92103-5020

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Hughson has not prepared a report in this case.

Dr. Hughson is board certified in pulmonology, internal medicine, and occupational medicine. Dr. Hughson also is an epidemiologist. Dr. Hughson practices medicine at the University of California, San Diego.

Dr. Hughson is expected to testify about certain encapsulated products (where the asbestos fibers are thoroughly blended and mixed with the encapsulating binder which prevents a significant release of fibers) in that he has reviewed information and studies regarding exposure levels experienced with certain work practices used with encapsulated products, and is familiar with the literature concerning low level exposures.

Dr. Hughson is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products was not a substantial contributing factor to plaintiffs' alleged asbestos-related disease. Dr. Hughson is expected to testify that the literature does not support a causal relationship between exposure to certain encapsulated products and the development of an asbestos-related disease. Dr. Hughson is expected to testify as to the ability of various types of fibers to cause disease and the properties of fibers that are believed to be necessary in order to cause disease.

Dr. Hughson is expected to testify generally about the pulmonary aspects of asbestos exposure, including matters such as dose response. Dr. Hughson is expected to testify about

alleged occupational exposure and whether such exposure could be considered a substantial contributing factor to plaintiffs' alleged diseases.

Dr. Hughson is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Hughson is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Hughson is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

A copy of Dr. Hughson's C.V. will be made available upon request.

16. Dr. Gerald R. Kerby
Kansas university Medical Center
Pulmonary Division
Kansas City, Kansas 66103

Dr. Kerby is a pulmonologist at Kansas University Medical Center. He will testify regarding general pulmonary physiology and medicine, including lung cancer and mesothelioma. It is his opinion that although asbestos may be found in the lung tissue, mesothelioma may not be caused by that asbestos.

17. Dr. Jerome Kleinerman
Dept. Of Pathology
Cleveland Metropolitan General Hospital
3395 Scranton Road
Cleveland, OH 44109

Dr. Kleinerman will testify about pulmonary pathology including, but not limited to, asbestos disease, tumors related to cigarette smoking, and other related matters.

18. Dr. Marvin Kuschner
Dean, Medical School
Health Sciences Center

SUNY, Stony Brook
Stony Brook, NY 11794

Dr. Kuschner is a pathologist. He will testify about the evolution of the pathology regarding asbestos, the evolution of the pathology regarding lung cancers, potential explanations for the development of cancer, and other questions. Dr. Kuschner may also testify about "State-of-the-Art" matters as they relate to asbestos associated diseases.

19. Dr. Brooke T. Mossman
Pathology Department
Medical Alumni Building
Room A151, University of Vermont
Burlington, Vermont 05405

Dr. Mossman is a Ph.D., who engages in research in Burlington, Vermont, where she is associated with the University of Vermont. She has performed substantial research into questions relating to the interaction between human lung tissue and asbestos. Specifically, she has performed in vitro studies on human lung tissue and asbestos both within and without the presence of cigarette carcinogens. She will testify about that research and her conclusions and opinions related thereto.

20. Dr. Joseph J. Renn
Internal Medicine Associates, Inc.
99 J.D. Anderson Drive
Morgantown, WV 26003

Dr. Renn is a pulmonologist. In addition to case specific testimony where applicable, he will testify generally about medical matters related to the chest, asbestos-related diseases, diseases which are related to cigarette smoking, and other pulmonary problems which are often seen either independently or in association with any of the foregoing. Dr. Renn may also testify about the medical literature and its related matters.

21. Dr. Nathaniel F. Rodman
WV University School of Medicine

Office of the Chairman
Dept. of Pathology, Room 2187
Morgantown, WV 26506

Dr. Rodman is a pathologist. He will testify about the evolution of asbestos disease, diseases related to cigarette smoking, and disease which were seen often, but not necessarily, in relation to the foregoing.

22. Dr. Victor Roggli
Assistant Professor of Pathology
Duke University Medical Center
Department of Pathology, Box 3712
Durham, NC 27710

Dr. Roggli is a pathologist at Duke University. He will testify generally about pulmonary pathology including, but not limited to, asbestos-related diseases, tumors related to cigarette smoking, carcinomas and other related matters.

23. Dr. Jonathan M. Samet
Chairman of the Department of Epidemiology
Johns Hopkins Institute
615 N. Wolfe Street
Baltimore, MD 21205Dr. Jonathan M. Samet

Dr. Samet is an internist and epidemiologist. He is expected to testify generally about the relationships between asbestos, cigarette smoking and lung cancer, and generally about the epidemiology of disease.

24. Dr. Peter W.J. Bartrip
Centre for Socio-Legal Studies
Wolfson College
Linton Road
Oxford OX2 6UD
United Kingdom

Dr. Bartrip has a Ph.D. in history. He is expected to testify generally about the development of the 1931 Asbestos Industry Regulations in the United Kingdom. He is expected to testify about the consultations among officials from the Factory Inspectorate, representatives

of manufacturers and representatives of organized labor prior to the promulgation of the Regulations.

25. Kevin Browne, M.D.
Leicester House
North Creake
Norfolk, England
NR21 9JP

Dr. Browne is expected to testify regarding all facets of asbestos-related disease, including, without limitation, respiratory system functioning, physiology, state of the art medical knowledge regarding asbestos-related disease, pathology, epidemiology and risk assessment.

Dr. Browne is an occupational medicine specialist with training in epidemiology. He is expected to testify concerning the physical aspects of asbestos and its relationship to human health; asbestos-related disease, diagnosis, treatment, prognosis and epidemiology; the etiology of cancer associated with asbestos exposure; the history of medical science concerning our knowledge and understanding of asbestos and asbestos-related disease; fiber types, dose/response and threshold levels needed to produce disease; and the relationship of asbestos exposure to other environmental and occupational factors and their comparative risks.

He is also expected to testify that the use of some asbestos-containing products does not create an asbestos health hazard and that any asbestos exposure from these products played no role in the genesis of plaintiffs' lung disease, if any.

Dr. Browne may testify about the defense mechanisms of the human lung, including but not limited to how the lungs protect themselves from foreign substances such as asbestos fibers. Dr. Browne may also testify regarding the mechanisms of asbestos-related disease. In addition, he may testify about threshold levels of asbestos exposure below which there is no known risk of asbestos-related disease. Dr. Browne may opine about the information and conclusions to be

drawn from human epidemiological, experimental animal and cellular studies concerning the ability of and circumstances under which asbestos fiber cause disease. Dr. Browne may also testify concerning the respirability and toxicity of different types of asbestos and their relationship, if any, to asbestosis, lung cancer, and mesothelioma.

26. Morton Corn, Ph.D.
Director, Division of Environmental Health Engineering
The Johns Hopkins University
Baltimore, Maryland 21205

Dr. Corn is expected to testify regarding the history and development of regulations and government documents concerning asbestos. He may testify about the dissemination and availability of information related to asbestos.

Dr. Corn is a Professor and the Division Director at the Johns Hopkins University, Department of Environmental Health Sciences, Division of Environmental Health Engineering and holds a Ph.D. in Industrial Hygiene and Sanitary Engineering from Harvard University. Dr. Corn will testify regarding exposure issues related to the handling of some asbestos-containing products as well as the relative risks, governmental regulations and feasibility of engineering controls. He may discuss and testify about levels of asbestos exposure experienced in various occupations and trades, fiber emitting propensities of products, factors affecting levels of exposure, and industrial hygiene practices. Dr. Corn will also testify that the reasonably foreseeable use of some asbestos-containing electrical products does not create a health hazard. Dr. Corn may base his opinions regarding use of such asbestos-containing products on various fiber release studies performed at industrial hygiene laboratories.

Dr. Corn may also testify regarding the history of governmental regulation of asbestos and the rulemaking process for such regulation.

27. John M.G. Davis, M.D.

Institute of Occupational Medicine Ltd.
8 Roxburgh Place
Edinburgh, Scotland
EH8 9SU

Dr. Davis is expected to testify concerning the development of knowledge of asbestos-related diseases as a result of in vitro and in vivo experimentation. Dr. Davis is expected to testify concerning fiber size, fiber deposition, fiber clearance and other aspects of asbestos-related pathology. Dr. Davis is also expected to testify concerning the views of Dr. Brody.

28. Janet Hughes, Ph.D.
Tulane University Medical Center
Section of Environmental Medicine SL15
1430 Tulane Avenue
New Orleans, Louisiana 70112

Dr. Hughes is expected to testify regarding the epidemiological and statistical analyses performed by herself and by others with respect to asbestos-related diseases.

29. Edward B. Illgren, M.D.
Conwyn Apartments
830 Montgomery Avenue
Bryn Mawr, Pennsylvania 19010

Dr. Illgren is expected to testify regarding all facets of asbestos-related disease, including, without limitation, respiratory system functioning, physiology, state of the art medical knowledge regarding asbestos-related disease, pathology, epidemiology and risk assessment. Dr. Illgren is expected to testify regarding risk assessment and epidemiological studies conducted by him and by others.

30. R.C. Austin
Faculty of Laws
University College London
Bentham House
Endsleigh Gardens
London WC1H OE6
England

Dr. Austin will testify about the procedures by which industrial regulations have been drafted and implemented in the United Kingdom. He will testify about the role of consultation among government, industry and labor in the creation of such regulations.

31. Richard J. Lee, Ph.D.
R.J. Lee Group, Inc.
350 Hochberg Road
Monroeville, PA 15146

Dr. Lee is expected to testify about the development of scientific knowledge and techniques regarding the measurement of levels of asbestos in the air and in lung tissue. Dr. Lee may comment upon techniques used by plaintiffs' experts to generate and analyze air, dust and lung tissue samples and conclusions drawn therefrom. Dr. Lee may also testify concerning the propensity of gasketing materials to release fibers and the specific fiber levels generated therefrom during normal use.

32. Arthur Langer, Ph.D.
Institute of Applied Sciences
Brooklyn College of the City University
New York, New York

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Langer has not prepared a report in this case.

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, crystollagraphically, 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 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.

33. Phillip Cagle, M.D.
Baylor School of Medicine
Dept. of Pathology
1200 Moursund Street
Room 286A
Houston, TX

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Cagle has not as yet prepared a report; if he does, a copy will be provided to Plaintiffs.

Dr. Cagle will be offered by these defendants as an expert physician, with particular expertise in pathology, in the process of carcinogenesis, as a researcher in the field of asbestos related conditions and their etiology, in the pathologic diagnosis and grading of non-malignant conditions associated with exposure of certain populations to asbestos-containing products and/or materials, and in the epidemiologic and etiologic aspects of certain cancers that are alleged to be causally associated with exposure of certain populations to asbestos containing products and/or materials.

Dr. Cagle is expected to provide testimony concerning the anatomic structure and functioning of the lung from a pathologic perspective, the defense mechanisms and functioning of the lung in health and otherwise, the responses of the lung to various stimuli, and the role of various components of the respiratory system in the proper functioning of the lung. Dr. Cagle is expected to describe and distinguish various types of asbestos fibers; to describe the things which affect the ability of asbestos fibers to affect various structures within the respiratory system; and to describe the body's specific responses to fibers of asbestos that are inhaled, whether or not they are retained.

It is further believed that Dr. Cagle will define and distinguish various conditions, such as asbestosis, pleural changes and other non-malignant changes that may be attributable in some

persons to the results of long term inhalation and retention of some forms of asbestos fiber. Dr. Cagle is further expected to be able to testify concerning the circumstances under which exposure to certain forms and types of asbestos may be associated with the incidence of some forms of mesothelioma in some persons, and will testify concerning the results of his own experiences, the medical and scientific literature, and existing epidemiologic studies concerning associations that are alleged to exist epidemiologically between exposure to asbestos in some populations and the mortality and/or incidence of some forms of cancer.

Dr. Cagle is further expected to offer testimony concerning the effects of inhaled tobacco smoke and other factors on the occurrence of disease in populations who are also alleged to be exposed to asbestos containing products, and additionally concerning how the effects of inhaled tobacco smoke and other factors can confound the apparent results of certain epidemiologic studies.

Dr. Cagle is also expected to testify that it cannot be said, to a reasonable degree of medical probability, that any hypothetical person's alleged "exposure" to products that may have contained asbestos was of importance to that individual, without reference to that specific person's individual work history, medical history, findings on physical examination and pathological examination of tissue, if any, information concerning the individual's use of protective equipment, specific types of asbestos containing product(s) used and/or handled, resolution of questions regarding exposures to substances other than asbestos-containing products, and other known etiologies for whatever conditions are found to exist.

It is further expected that Dr. Cagle's testimony will generally respond to the pathologic, scientific and epidemiologic testimony which may be offered by plaintiffs' experts, and in that

sense his testimony is dependent upon the prior testimony of such experts and cannot be specifically predicted.

In expressing his opinions, Dr. Cagle will rely on his own training, education, experience, research and publications, as well as the published medical and scientific literature that has been available to him over his career.

Dr. Cagle may testify as to the general medical aspects of the diagnosis and treatment of asbestos-related disease and the pathological effect of asbestos on the lung. He may also testify as to the relationship of asbestos exposure and the incidence of cancer. Dr. Cagle 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 affect 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. affect of asbestosis, or asbestos exposure without asbestosis, on disability and life expectancy; effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy;

14. the lack of a relationship between presence of pleural plaques and a later development of any form of cancer;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the history of evolution and knowledge of asbestos-related diseases;

17. the fiber types and exposure levels considered to be substantial in causing asbestos-related disease, specifically mesothelioma.

Additionally, Dr. Cagle may testify concerning the diagnosis of plaintiffs. Dr. Cagle may also testify as to his findings and diagnosis after examination and analysis of tissue, slides or other pathologic materials, medical records, reports, radiographs and plaintiffs' work history. He may give testimony concerning his review of any report purported to be diagnostic of any oncological condition and the methods of and procedures for conducting fiber counts. He may give testimony regarding malignancies associated with asbestos exposure or cigarette abuse and other malignancies from which they must be differentiated, the appropriate protocols for diagnosis of those conditions, prognosis and information relating to the known causes of those malignancies. He may testify concerning the text and other literature relevant to any malignancy purported to be asbestos-related and any other malignancy from which it must be distinguished, including data relevant to contentions of increased risk of asbestos-related disease or cancer,

prognosis, the relevant standards of care and considerations relating to medical monitoring. His testimony may include discussion of any relevant epidemiology, anatomy and physiology.

34. Dr. James Crapo
National Jewish Center
Denver, CO

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Crapo has not as yet prepared a report in this case; if he does, a copy will be provided to Plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and, therefore, defendants cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendants reserve the right to supplement this statement.

Dr. Crapo is board certified in internal medicine with a subspecialty certification in pulmonary diseases. Dr. Crapo practices medicine at the National Jewish Medical Center in Denver, Colorado.

Dr. Crapo is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity, and the potential for asbestos-related disease as a result of exposures to the different types of fibers. Dr. Crapo is expected to testify as to general medical issues and physiology.

Dr. Crapo is expected to testify about alleged occupational exposure--as described by plaintiffs' witnesses--and whether such exposure could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Crapo is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Crapo is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Crapo is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

Dr. Crapo is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Crapo may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Crapo is also expected to testify about any matter raised by experts called by the Plaintiffs or Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

35. Dr. M. Joseph Fedoruk
Los Angeles, CA

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Fedoruk has not as yet prepared a report in this case; if he does, a copy will be provided to Plaintiffs.

Defendant is not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and, therefore, defendant cannot proffer all expected testimony until it has had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time

that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendant reserves the right to supplement this statement.

Dr. Fedoruk is board certified in internal medicine and occupational medicine and is a certified industrial hygienist. Dr. Fedoruk practices in Los Angeles, California.

Dr. Fedoruk is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity, and the potential for asbestos-related disease as a result of exposures to the different types of fibers. Dr. Fedoruk is expected to testify as to general medical issues and physiology.

Dr. Fedoruk is expected to testify about alleged occupational exposures and whether such exposure could be considered a substantial contributing factor to plaintiffs' alleged diseases.

Dr. Fedoruk is expected to testify about the principles of industrial hygiene and the factors that are important to industrial hygiene studies. He is expected to testify to the manner in which medical experts can use industrial hygiene data and how the data should be interpreted in specific cases. Dr. Fedoruk is expected to testify as to the manner should be properly considered in evaluating exposures.

A copy of Dr. Fedoruk's C.V. will be made available upon request.

36. Dr. Raymond Weiss
Rockville, Maryland

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Weiss has not as yet prepared a report in this case; if he does, a copy will be provided to plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiffs intend to produce at trial and, therefore, defendants cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a

witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, these defendants reserve the right to supplement this statement.

Dr. Weiss is board certified in internal medicine and oncology. Dr. Weiss practices in Rockville, Maryland.

Dr. Weiss is expected to testify about the alleged carcinogenic aspects of asbestos exposure, including matters such as dose response, epidemiology, and the types of cancer that are medically accepted as causally associated with exposure to asbestos. Dr. Weiss is expected to testify as to general medical issues and carcinogenicity.

A copy of Dr. Weiss' C.V. will be made available upon request.

37. Mr. Charles Blake
Atlanta, Georgia

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Mr. Blake has not as yet prepared a report in this case; if he does, a copy will be provided to Plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiffs intend to produce at trial and, therefore, defendants cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendants reserve the right to supplement this statement.

Mr. Blake is a certified industrial hygienist. Mr. Blake is employed in Atlanta, Georgia.

Mr. Blake is expected to testify about alleged occupational exposures of plaintiffs and whether such exposure could be considered as creating a scientifically significant amount of risk for the development of an asbestos-related disease.

Dr. Blake is expected to testify about the principles of industrial hygiene and the factors that are important to industrial hygiene studies. He is expected to testify as to the manner in which experts can use industrial hygiene data and how the data should be interpreted in specific cases. Mr. Blake is expected to testify as to the manner in which industrial hygiene data should be properly considered in evaluating exposures.

Mr. Blake will be provided with copies of the testing data of experts retained by counsel for plaintiffs and will be asked to comment on the methods used in the studies as well as the results of the studies, as compared to published studies and work performed by Mr. Blake in the past.

A copy of Mr. Blake's C.V. will be made available upon request.

38. Dr. Robert Jones
Tulane University Medical Center
2430 Tulane Avenue
New Orleans, LA

Dr. Jones is a specialist in pulmonary medicine.

Dr. Jones is a pulmonologist who is currently a staff physician at Tulane Medical Center Hospital and a Professor of Medicine at Tulane University School of Medicine in New Orleans, Louisiana. Dr. Jones is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Jones may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing

cancers. Dr. Jones is also expected to testify about any matter raised by experts called by the Plaintiffs or Co-Defendants including, but not limited to, plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases

39. Dr. Robert Sawyer
149 Prospect Avenue
Guilford, CT 06437

Dr. Sawyer is an industrial hygienist who is expected to testify regarding fiber release from various products, threshold limit values, and dose values for disease.

Dr. Sawyer may further testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of any 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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. With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature

and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs.

Dr. Sawyer's testimony will be based on his training, experience, education, and review of the medical literature concerning asbestos related disease.

40. Mark Lehto, Ph.D.
Purdue University
Purdue, Indiana

Dr. Lehto will testify about the history of warnings and the proper content of product warnings.

41. Dr. James Rasmuson
Denver, CO

Dr. Rasmuson is an industrial hygienist who will testify about the history of industrial hygiene, threshold values, the measurement of atmospheric dust, and particulate matter, and other related matters.

Dr. Rasmuson may offer testimony about each of the products at issues in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

Dr. Rasmuson may also testify about steel plants and the use of various products at those plants.

Dr. Rasmuson will testify about Johns Manville, Owens Corning Kaylo, and Pittsburgh Corning.

42. Dorsett Smith
4310 Colby Avenue, Suite 201
Everett, WA 98203

Dr. Smith will testify about the pathology of asbestos related diseases, his research into asbestos related diseases, the carcinogenicity of various fiber types, and the relationship, if any,

between asbestos and various diseases. Dr. Smith will testify about the epidemiology of asbestos related diseases, latency, state-of-the-art, and other related matters. Dr. Smith will testify about case specific testimony, where applicable. He will testify about the evolution of asbestos disease, cigarette related diseases, and other respiratory or systemic conditions, specifically carcinomas, seen either independently or in connection with either of the foregoing. Dr. Smith will testify about the various fiber types of asbestos and, if necessary, about apportionment between product usage.

43. Robert Murray
United Kingdom

Dr. Murray will testify about the development of knowledge concerning the health effects of asbestos and about practices with respect to asbestos and health in the United Kingdom. He will testify live or by deposition, consistent with his depositions In RE: Asbestosis School Litigation, U.S.D.C., Eastern District of Pennsylvania, No. 83-0268, November 19, 1990; or Cimino, et al. v. Raymark Industries, Inc., et al., U.S.D.C., Eastern District of Texas, No. B-86-0456-CA, January 30, 1990; or John L. May, Archbishop of St. Louis, et al. v. ACandS, Inc., et al., U.S.D.C., Eastern District of Missouri, 88-0386-C-5, July 16, 1992.

44. Otto Wong, Sc.D., F.A.C.E.
Applied Health Science, Inc.
181 Second Avenue
Suite 628
San Mateo, CA 94401

Dr. Wong is a Board-certified epidemiologist and a fellow of the American College of Epidemiology. He is expected to testify regarding the history and development of scientific and medical knowledge about asbestos-related disease, the epidemiology of asbestos diseases, and increased risk of cancer and life-shortening problems not related to asbestos exposure. He is also expected to testify as to the status of epidemiological studies regarding asbestos-related diseases.

45. Brooks Emory, M.D.
Jefferson Hospital
1507 Meterie Road
New Orleans, Louisiana

Dr. Emory is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Emory may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Emory is also expected to testify about any matter raised by experts called by the Plaintiffs and Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos-related diseases and other occupational diseases.

46. Ben Branscomb, M.D.
Professor of Medicine
University of Albama School of Medicine
Birmingham, Alabama

Dr. Branscomb is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Branscomb may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Branscomb is also expected to testify about any matter raised by experts called by the plaintiffs or co-defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

47. James E. Lockey, M.D., M.S.
Institute of Environmental Health

University of Cincinnati Medical Center
Clinical Studies Division
5251 Medical Science Bldg., M . L. 182
231 Bethesda Ave.,
Cincinnati, Ohio 45267-0182

Dr. Lockey is a pulmonologist who is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases, and the risks associated with developing cancers. Dr. Lockey is also expected to testify about any matter raised by experts called by the Plaintiffs and Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases. Dr. Lockey may also be expected to testify concerning the state of the available medical knowledge regarding asbestos related disease at the relevant historical periods of time.

48. Harry B. Demopoulos, M .D.
N.Y.U. Medical Center
Department of Pathology
550 First Avenue
New York, New York 10016

Dr. Demopoulos is a professor of pathology at New York University and Medical Center. Dr. Demopoulos may be expected to testify live or by deposition concerning the state of the available medical knowledge regarding asbestos-related disease at the relevant historical periods of time. Dr. Demopoulos may also testify concerning current medical knowledge regarding plaintiffs' condition and asbestos-related disease.

49. James Cimino, M .D., M.P.H.
Professor and Chairman
Department of Community Preventive Medicine
New York College
50 Willard Avenue
North Tarryton, New York 10591

Dr. Cimino is presently professor and chairman of the Department of Community and Preventive Medicine, New York Medical College, Valhalla, New York. Dr. Cimino may be expected to testify live or by deposition concerning the state of the available medical knowledge regarding asbestos-related disease at the relevant historical periods of time. Dr. Cimino may also testify concerning current medical knowledge regarding plaintiffs' condition and asbestos-related disease.

50. Stephen M. Ayers, M.D.
Medical College of Virginia
Box 565 MCV Station
Richmond, VA 23298

Dr. Ayers may be expected to testify live or by deposition concerning the state of the available medical knowledge regarding asbestos-related disease at the relevant historical periods of time. Dr. Ayers may also testify concerning current medical knowledge regarding plaintiff's condition and asbestos-related disease.

Dr. Ayers may testify on state-of-the-art and the Saranac papers, to the effect that Defendants could not have known end users were at risk until approximately the late 1960s. He may also testify as to any matter raised by experts called by plaintiffs or any co-defendants.

51. John G. Weg, M.D.
Pulmonary & Critical Care Medicine Division
University Hospital
University of Michigan
Ann Arbor, MI

Dr. Weg will testify concerning the state of the available medical knowledge regarding asbestos-related disease at the relevant historical periods of time and the process by which medical knowledge evolved concerning exposure to asbestos-containing products. Dr. Weg will also testify as to issues of medical causation in certain cases.

52. Mr. Dohrman Byers
12060 Lawnview Avenue - #6
Cincinnati, Ohio

Mr. Byers' testimony may be presented by way of deposition taken on October 21, 1985, in Brandt v. Owens-Illinois, Inc., Case No. 605-147, Milwaukee Circuit Court, Wisconsin.

Mr. Byers testified as to the interpretation and application of the Threshold Limit Value by the U.S. Public Health Service.

53. Alan S. Todd, CIH
Todd Environmental Consultants, Inc.
1012 West Ninth Avenue
King of Prussia, PA 19406

Mr. Todd will testify about the asbestos exposures encountered aboard merchant marine vessels.

54. Roger L. Wabeke
Chemical Risk Management
8 Windham Lane
Dearborn, MI 48120

Mr. Wabeke will testify about the asbestos exposures encountered aboard merchant marine vessels.

55. H. Corwin Hinshaw, M.D.
Professor Emeritus, U.S. Medical Center
450 Sutter Street
San Francisco, California

Dr. Hinshaw may testify live or by deposition concerning asbestos-related disease, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Hinshaw may also be expected to testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Hinshaw may also testify about any matter raised by experts called by the Plaintiffs

or Co-Defendants including, but not limited to, asbestos-related disease, the state of medical knowledge concerning asbestos, and occupational diseases. Dr. Hinshaw may further testify concerning the state of the available medical knowledge regarding asbestos-related disease at the relevant historical periods of time. Dr. Hinshaw may also testify concerning current medical knowledge regarding plaintiffs' medical condition.

56. Douglas Fowler, Ph.D.
643 Blair Island Road, Number 305
Redwood City, California 94863

Dr. Fowler is an industrial hygienist who may testify live or by deposition concerning issues relating to plaintiff's theories of "fiber drift," issues relating to the threshold limit value, protective measures, plaintiffs' level of exposure to asbestos, and other industrial hygiene-related issues.

57. Dr. Pat Hessel
Alberta Asthma Center
P.O. Box 4033
Edmonton, Alberta T6E 6K2

Dr. Hessel may testify live or by deposition concerning the epidemiology of asbestos-related diseases among various populations.

58. Henry C. Field, M.S.
Virginia Beach, Virginia.

Mr. Field may testify live or by deposition about the construction, overhaul, and repair of ships. Based upon his training, background, experience, and documents he has reviewed, he will testify as to when various asbestos-related products may have been used is ship construction or in overhaul and repair work. He will also testify regarding seamen's various job functions and any exposures in the course of those activities.

59. Captain Douglas B. Brown
Department of Engineering

U.S. Merchant Marine Academy
Kings Point, New York

Captain Brown may testify live or by deposition about the construction, engineering, and routine operation of ships. Based upon his training, background, experience, and documents he has reviewed, he will testify as to when and how various asbestos-related products may have been used in ships and whether use of those products would ever result in the release of dust. He will also testify regarding seamen's various job functions and any exposures in the course of those activities.

60. James A. Wilson
Marine Consulting and Surveying
99648 Wellington Drive
North Olmsted, Ohio 44070

Mr. Wilson will testify regarding the regulations and standards administered and enforced by the U.S. Coast Guard concerning the use of asbestos aboard inspected commercial and government owned or chartered vessels operated under an inter-agency inspection agreement; the general contents and purposes of various Coast Guard standards as contained in federal regulations, approved equipment lists, Navigation and Investigation Circulars (NVICs), and internal standards enforcement procedures; limitations imposed upon inspected vessels in the use of non -approved materials; and procedures established by the U.S. Coast Guard for the use, repair, and maintenance of asbestos and asbestos containing insulation, gaskets, and other shipboard materials.

61. I. Allen Feingold, M.D.
South Miami Hospital
7400 Southwest 62nd Avenue
Miami, Florida

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 will also testify that work with some asbestos-containing products does not result in dangerous asbestos fiber exposure and 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 asbestos 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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.

62. Carl Mangold, C.I.H.

Dr. Mangold is a certified industrial hygienist. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contain asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

63. Larry Liukonen, C.I.H.

Mr. Liukonen is a certified industrial hygienist. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

64. Donna M. Ringo, C.I.H.

Donna M. Ringo is a certified industrial hygienist. She may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. She

may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. She may testify as to issues involving reentrainment and fiber drift. She may testify as to work practices regarding various types of occupations using products that contained asbestos. She may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. She may testify as to exposure that may result from the use of other types of asbestos products.

65. Robert Gay, Ph.D.

Dr. Gay is an environmental consultant and chemist. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

66. Henry J. Silverman, M.D.

Dr. Henry J. Silverman may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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.

With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs. Dr. Silverman's testimony will be based on his training, experience, education and review of the medical literature concerning asbestos related disease.

67. Robert W. Morgan, M.D.

Dr. Robert Morgan may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of any 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the

existence 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. With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs.

Dr. Morgan's testimony will be based on his training, experience, education, and review of the medical literature concerning asbestos related disease.

68. Terrence Moisan, M.D.

Dr. Terrence Moisan may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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. With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs.

Dr. Moisan's testimony will be based on his training, experience, education, and review of the medical literature concerning asbestos related disease.

69. Stanley Fiel, M.D.

Dr. Stanley Fiel may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for the 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 caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of 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.

With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or

conditions are present in plaintiffs. Dr. Fiel's testimony will be based on his training, experience, education and review of the medical literature concerning asbestos related disease.

70. Michael Graham, M.D.

Dr. Michael Graham is a board certified pathologist who may give testimony regarding the pathological diagnosis of the medical condition of any plaintiff and in the case of a deceased plaintiff, may give testimony as to the cause of death. He will further testify as to whether any given plaintiff or plaintiff's decedent had a condition or illness caused by asbestos exposure. He may also testify on the latency period related to various asbestos related diseases and the carcinogenic properties of different types of asbestos fibers.

71. John Fennessey, M.D.

Dr. John Fennessey is a practicing radiologist and a B-reader certified by NIOSH. His testimony will relate to his interpretation of chest films taken of the plaintiffs. It is anticipated that Dr. Fennessey will testify generally as to his interpretation of the plaintiff's chest films, the presence of any asbestos-related condition as evidenced on the chest film, and the presence of other abnormalities or conditions unrelated to any exposures to asbestos.

72. Ronald G. Crystal, M.D.
Bruce Webster Professor of Internal Medicine
Cornell University Medical College
520 East 70th Street -- Starr #505
New York, NY 10021

Dr. Crystal may testify regarding the different types of asbestos, asbestos-related health effects, the functioning of the respiratory system, lung defense mechanisms, and lung fiber burden. Dr. Crystal may also testify regarding risk assessment, state of the art medical knowledge regarding asbestos, and other related medical and scientific subjects. Dr. Crystal may testify regarding levels of asbestos exposure below which no disease has been found. He may

also quantify high levels of exposure and differentiate those from low levels of exposure, exposure in buildings, materials and ambient air. Dr. Crystal may comment regarding studies, epidemiological or animal data, articles or other materials relied upon by experts in the field. His testimony will be based upon his education, experience, and the literature In his fields of expertise.

73. John Addison
25 Haddington Place
Edinburgh, Scotland EH7 4AF

John Addison is a mineralogist with particular expertise in asbestos mineralogy. Dr. Addison may express opinions specific to plaintiffs based upon actual analysis of tissue. He may also proffer case-specific opinions even if he has not conducted separate tissue content analysis and quantification. Dr. Addison may proffer opinions from the perspective of a mineralogist about the causation of any medical condition diagnosed by physicians in these matters.. Dr. Addison may testify about the physical, chemical and aerodynamic aspects, as well as biological effects of all minerals pertinent to these matters, including asbestos. He may testify about the analytical methods utilized over time to identify and quantify mineral dusts and the role of various minerals in causing mesothelioma and that commercially available chrysotile probably does not cause or contribute to cancer.

74. Mr. Lawrence R. Birkner
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, California 91362-1822

Larry Birkner is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator

history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Birkner has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skills, and training. Mr. Birkner may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-

related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any co-defendants.

Mr. Birkner may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Mr. Birkner may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Mr. Birkner may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr. Birkner may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

Mr. Birkner will testify that he has examined documents from Johns Manville and other manufacturers of asbestos products. He has reached the conclusion that Johns Manville was clearly one of the world's leader in the production of raw fiber asbestos and the production of asbestos-containing products. He has also reached the conclusion that John's Manville was clearly the North American leader when it came to the use of asbestos in products which were going to be offered for sale to purchasers in the United States. He will testify that in the 1930's Johns Manville's role within the asbestos industry towered above the roles of any other company. Johns Manville mined, milled and sold raw asbestos fibers. This fiber was also used in many of Johns Manville's own asbestos containing products.

Mr. Birkner believes that "state-of-the-art documents and articles" shows that Johns Manville was involved with and contributed to several scientific research studies in the 1930's at the Saranac Laboratories. Mr. Birkner believes that the Saranac Laboratory had been a tuberculosis institute during the 1930's, and that it was noted for its scientific research. In particular, Dr. Gardner, the Saranac director, was an imminent dust researcher.

Mr. Birkner will testify that as this country developed more industrial needs and additional manufacturing capability, the nation needed an increased need for the generation of electricity. Mr. Birkner will testify that it was necessary to build power plants for the production of that energy, and that it was necessary to build chemical and petro-chemical facilities, all of which required asbestos insulation. Mr. Birkner has examined catalogues, documents, and other papers, which show that Johns Manville and other companies were the principal suppliers of asbestos insulation and were the chief beneficiaries of the increased work in this area.

Mr. Birkner will testify that "state-of-the-art" documents show that the sales of pipe insulation, block, and cement skyrocketed through the late 1930's. He will testify that in 1941, when the war started, the United States Government required the use of asbestos-containing insulation in the construction of ships for manufacture of war. This construction would have required use of asbestos-containing insulation products and resulted in 100,000 shipyard workers being exposed to this product. He will testify that the "state-of-the-art" documents show that during the construction of ships, the principal asbestos products which were used were asbestos containing pipe covering block and cements manufactured by Johns Manville and the others mentioned in this statement. In contrast Johns Manville made a number of high temperature insulation products that would have been used in ship construct and repair. He will testify that

Johns Manville and the other asbestos containing thermal insulation manufacturers were the largest in market share and dominated the US market for use of asbestos.

Mr. Birkner will testify about the whole Saranac history and documents, the National Cancer Institute, and the development of writings about lung cancer as it relates to asbestos exposure. He will testify that from "state-of-the-art" documents lung cancer was a rare disease in the 30's and 40's and distinguish it from the notoriety of today. He will testify that any protection from cancer was little known to industrial hygienists in the 40's and 50's and was based upon knowledge of protection of workers for asbestosis. He will testify that the Doll Study in 1955 on cigarette smoking and also on asbestos was a significant but not final development in the evolution of information about the causes of cancer. He will testify that in later 1959, some Union officials approached Doctor Selikoff because they (the Union officials) (and their workers) were in a unique position to see that for some reason the insulation workers were having an increased amount of disease. He will testify that because of the data available on the workers from the Union, Selikoff began to study the workers in the insulator's union. He will testify that in 1963, he developed initial information that indicated that insulation workers were at a higher risk of death from job site asbestos exposure. The witness will testify that the first people Selikoff reported this information to were the insulation workers and their unions, and that this information was reported to them prior to publication in National medical journals. He will testify that the Asbestos Worker Magazine, a magazine that was directed to all union asbestos insulators, carried the information that the workers who worked with asbestos insulation were subject to disease. He will testify that based on this information, the 1964 Conference was organized.

Mr. Birkner will testify that thermal insulation was the focus of all the medical and scientific concern and not joint compound.

Mr. Birkner may offer testimony about each of the products at issue in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

Mr. Birker may also testify about the steel plants and the use of various products at those plants.

Mr. Birkner will testify about Johns Manville, Owens Corning Kaylo, and Pittsburgh Corning.

75. Dr. Russell Harley
MUSC - Pathology
Charleston, SC 29425

Dr. Harley is expected to provide testimony concerning the anatomic structure and functioning of the lung from a pathologic perspective, the defense mechanisms and functioning of the lung in health and otherwise, the responses of the lung to various stimuli, and the role of various components of the respiratory system in the proper functioning of the lung. Dr. Harley is expected to describe and distinguish various types of asbestos fibers; to describe the things which affect the ability of asbestos fibers to affect various structures within the respiratory system; and to describe the body's specific responses to fibers of asbestos that are inhaled, whether or not they are retained.

It is further believed that Dr. Harley will define and distinguish various conditions, such as asbestosis, pleural changes and other non-malignant changes that may be attributable in some persons to the results of long term inhalation and retention of some forms of asbestos fiber. Dr. Harley is further expected to be able to testify concerning the circumstances under which

exposure to certain forms and types of asbestos may be associated with the incidence of some forms of mesothelioma in some persons, and will testify concerning the results of his own experiences, the medical and scientific literature, and existing epidemiologic studies concerning associations that are alleged to exist epidemiologically between exposure to asbestos in some populations and the mortality and/or incidence of some forms of cancer.

Dr. Harley is further expected to offer testimony concerning the effects of inhaled tobacco smoke and other factors on the occurrence of disease in populations who are also alleged to be exposed to asbestos containing products, and additionally concerning how the effects of inhaled tobacco smoke and other factors can confound the apparent results of certain epidemiologic studies.

Dr. Harley is also expected to testify that it cannot be said, to a reasonable degree of medical probability, that any hypothetical person's alleged "exposure" to products that may have contained asbestos was of importance to that individual, without reference to that specific person's individual work history, medical history, findings on physical examination and pathological examination of tissue, if any, information concerning the individual's use of protective equipment, specific types of asbestos containing product(s) used and/or handled, resolution of questions regarding exposures to substances other than asbestos-containing products, and other known etiologies for whatever conditions are found to exist.

It is further expected that Dr. Harley's testimony will generally respond to the pathologic, scientific and epidemiologic testimony which may be offered by plaintiffs' experts, and in that sense his testimony is dependent upon the prior testimony of such experts and cannot be specifically predicted.

In expressing his opinions, Dr. Harley will rely on his own training, education, experience, research and publications, as well as the published medical and scientific literature that has been available to him over his career.

Dr. Harley may testify as to the general medical aspects of the diagnosis and treatment of asbestos-related disease and the pathological effect of asbestos on the lung. He may also testify as to the relationship of asbestos exposure and the incidence of cancer.

76. Sheldon Rabinovitz
Sandler Occupational Associates
966 Hungerford Dr., Suite 20
Rockville, MD 20852

The following statement of expected testimony was been prepared by counsel to comply with the expert witness disclosure requirements. The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Rabinovitz has not prepared a report for this case.

Defendant is not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and, therefore, defendant cannot proffer all expected testimony until it has had the benefit of reviewing all of plaintiff's expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendant reserves the right to supplement this statement.

Dr. Rabinovitz is a certified industrial hygienist and toxicologist. He is employed at SOMA, and is a past employee of EPA and NIOSH. A copy of his C.V. will be provided.

Dr. Rabinovitz is expected to testify about the principles of industrial hygiene and the factors that are important to industrial hygiene studies both currently and historically. He is

expected to testify as to the manner in which experts can use current and historical industrial hygiene data and how the data should be interpreted in specific cases.

Dr. Rabinovitz is familiar with the historical state of the art practices and the information available in the medical and scientific literature.

A copy of Dr. Rabinovitz's C.V. will be made available upon request.

77. Sidney Shindell, MD, LLB
Medical College of Wisconsin
8701 Watertown Plank Road
Milwaukee, Wisconsin 53226

A. STATE OF THE ART:

Dr. Shindell is a physician. 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. Shindell will testify about his personal experience in the development of the history of asbestos related medicine and the medical literature and his impressions of 1964 being a "watershed" as it relates to asbestos disease.

Dr. Shindell will testify regarding 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.

B. MEDICAL TESTIMONY

Dr. Shindell may 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 affect of exposure to substances other than asbestos, such as tobacco, 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. affect of asbestos, or asbestos exposure without asbestos, on disability and life expectancy;

14. effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy;

15. the relative carcinogenicity of chrysotile asbestos relative to the other forms of asbestos;

C. THE ROLE OF CHRYSOTILE AS A CARCINOGEN FOR MESOTHELIOMA:

Dr. Shindell is expected to testify as to the ability of various types of fibers to cause disease and the properties of fibers that are believed to be necessary in order to cause disease. He

is expected to testify that Chrysotile asbestos fibers are not expected to produce an increase risk to mesothelioma.

D. THE ROLE OF ENCAPSULATED PRODUCTS IN THE RELEASE OF ASBESTOS:

Dr. Shindell is expected to testify about certain encapsulated products (where the asbestos fibers are thoroughly blended and mixed with the encapsulating binder which prevents a significant release of fibers) in that he has reviewed information and studies regarding exposure levels experienced with certain work practices used with encapsulated products, and is familiar with the literature concerning low level exposures.

Dr. Shindell is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products was not a substantial contributing factor to plaintiffs' alleged asbestos-related disease. Dr. Shindell is expected to testify that the literature does not support a causal relationship between exposure to certain encapsulated products and the development of an asbestos-related disease.

E. DOSE RESPONSE

Dr. Shindell is expected to testify generally about the pulmonary aspects of asbestos exposure, including matters such as dose response. Dr. Shindell is expected to testify about alleged occupational exposure and whether such exposure could be considered a substantial contributing factor to plaintiffs' alleged diseases.

Dr. Shindell is expected to testify that as exposures to asbestos have diminished since the inception of the OSHA standards, the extent and number of cases of asbestosis have been and are expected to continue to diminish.

F. EPIDEMIOLOGY

Dr. Shindell is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Shindell is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Shindell is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

G. LUNG CANCER

Dr. Shindell is expected to testify that cigarette smoking is the chief cause of lung cancer, that almost all of the lung cancers in America occur in present or ex-smokers, and that one cannot develop lung cancer related to asbestos exposure unless there is underlying asbestosis.

H. DEVELOPMENT OF MESOTHELIOMA

Dr. Shindell is expected to testify that the earlier exposures to asbestos are, if sufficient, the principal cause of the disease and not later exposures.

Dr. Shindell is expected to testify that in at least 33% of mesotheliomas, asbestos exposure cannot be found.

78. William Dyson
WorkPlace Hygiene
1022 Jefferson Road
Greensboro, NC 27410

William Dyson is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial

hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Dyson has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skills, and training. Mr. Dyson may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any

co-defendants. Mr. Dyson may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Mr. Dyson may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Mr. Dyson may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr. Dyson will discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

79. Professor Fred Pooley
Department of Minerals & Materials
University of Cardiff
Cardiff, Wales, UK

The following statement of expected testimony was been prepared by counsel to comply with the expert witness disclosure requirements. The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness.

Professor Pooley has not prepared a report for this case.

Professor Pooley is expected to testify regarding studies analyzing lung tissue from miners, millers, etc., and that compared to the lung tissue of people who have worked with a milled chrysotile finished product, the studies demonstrate that there is significantly lower lung burden of tremolite in the people who have worked with milled chrysotile.

Professor Pooley is also expected to testify that tremolite is substantially removed from the ore in the milling process in that the lung burden for tremolite in miners and millers is on the

order of magnitude of 99 fibers of tremolite to every fiber of chrysotile whereas the lung burden for people who work with the milled finished product is on the order of 1 fiber of tremolite to 99 fibers of chrysotile. He will also testify regarding his examination of Canadian ore after milling and that he finds a very small level of tremolite. In comparing his findings to the assays of Canadian chrysotile before milling, he finds the level of tremolite to be reduced.

Professor Pooley is of the opinion that all minerals have a fibrogenic potential assuming the same penetration into the lung, the same locations of deposition, and the same time of residence. He believes that chrysotile is less fibrogenic than either crocidolite or amosite because the chrysotile has repeatedly shown that it has a reduced penetration, different and lesser deposition location, and is removed more quickly from the lung. Therefore, he believes, chrysotile is less likely to cause asbestosis.

Also, he concludes that almost all of the asbestosis which he studied in 1977 resulted from amphiboles, not chrysotile. Any asbestosis associated with the use of chrysotile was attributable to tremolite. Chrysotile is less likely to produce asbestosis in humans than amphiboles because it has lower penetration, a different deposition pattern, and a different retention within the lung. Therefore, since the existence of asbestosis is a prerequisite for the attribution of lung cancer to asbestos, chrysotile is less likely to be a cause of lung cancer. He is also of the belief that crocidolite is the overwhelming cause of mesothelioma with amosite being only a small cause.

80. James M. Bachman
Rancho Palos Verdes, CA 90275

Mr. Bachman is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He will testify as to all areas of his industrial hygiene experience as an Industrial Hygienist employed by Atlantic Richfield Company. Mr. Bachman is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which

trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may also testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Bachman has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skills, and training. Mr. Bachman may testify about the size, construction, layout and working environment of facilities such as where the Plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about this knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether the same products identified are capable of emitting respirable

fibers of type or quantity which could have substantially contributed to the Plaintiffs' alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the Plaintiffs or any Co-Defendants. Mr. Bachman may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Mr. Bachman may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos-containing products or equipment with asbestos insulation. Mr. Bachman may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

81. Gayla McCluskey
Six Hartford Lane
Suite 106
Radnor, PA 19087

Gayla McCluskey is a certified Industrial Hygienist trained in the measurement of dusts and related matters. She is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. She is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. She may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. She may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. She may testify as to issues involving

reentrainment and fiber drift. She may testify as to work practices regarding various types of occupations using products that contained asbestos. She may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. She may testify as to exposure that may result from the use of other types of asbestos products.

Ms. McCluskey has personal knowledge of relevant facts but is also an expert based upon her specialized knowledge, skills, and training. Ms. McCluskey may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. She may testify about the nature of the working environment in such locations. She may testify about her knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. She may testify generally as to the industrial hygiene state-of-the-art. She may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. She may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. She may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. She may testify about applicable governmental standards and regulations. She may also testify as to any matter raised by experts called by the plaintiff or any co-defendants.

Ms. McCluskey may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Ms. McCluskey may testify concerning: (1) circumstances in occupational settings that

may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Ms. McCluskey may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Ms. McCluskey may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. She may also testify about the importance of the development of warnings ideas as they relate to asbestos.

Ms. McCluskey may offer testimony about each of the products at issue in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

Ms. McCluskey may also testify about the steel plants and the use of various products at those plants.

Ms. McCluskey will testify about Johns Manville, Owens Corning Kaylo, and Pittsburgh Corning.

82. Gustavo Delgado

Gustavo Delgado is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and

packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Delgado has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skills, and training. Mr. Delgado may testify about the size, construction, layout, and working environment of facilities such as where the plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any co-defendants. Mr. Delgado may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and

occupational settings. Mr. Delgado may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Mr. Delgado may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr. Delgado will discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

Mr. Delgado may create an exposure evaluation in this case. He may create a retrospective exposure assessment for the plaintiff in this case, for any of the products, for a co-worker, or for a job site. He may create an exposure assessment using another method. In creating the exposure analysis. Mr. Delgado may rely upon scientific and industrial articles and papers which reveal the various exposure for various products in various settings. In doing his assessment, he may rely upon the plaintiff's testimony, the testimony of co-workers and family members, and personal visits he has made to the same or similar sites, photographs which reveal relevant information, summaries or affidavits, actual dust counts from the same or similar activities, answers to interrogatories, from this and other cases which reveal relevant facts, including the fiber content and fiber type of various products, and information revealed through conversations with other industrial hygienists and scientists which are of a kind which industrial hygienists usually rely upon.

83. Dr. Roger McClellan

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. McClellan has not as yet prepared a report in this case; if he does, a copy will be provided to Plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and, therefore, defendants cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendants reserve the right to supplement this statement.

Dr. McClellan is a Doctor of Veterinary Medicine, and he is an epidemiologist. Dr. McClellan is retired.

Dr. McClellan is expected to testify about animal studies and the relationship between animal studies and aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity, and the potential for asbestos-related disease as a result of exposures to the different types of fibers. Dr. McClellan is expected to testify as to general medical issues and physiology.

Dr. McClellan is expected to testify about alleged occupational exposure--as described by plaintiffs' witnesses--and whether such exposure could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. McClellan is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. McClellan is expected to testify as to the information necessary to determine the risks for a group

of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. McClellan is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

Dr. McClellan is expected to testify either live or by deposition concerning plaintiffs' medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. McClellan may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. McClellan is also expected to testify about any matter raised by experts called by the Plaintiffs or Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

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

14. the lack of a relationship between presence of pleural plaques and a later development of any form of cancer;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the history of evolution and knowledge of asbestos-related diseases;

17. the fiber types and exposure levels considered to be substantial in causing asbestos-related disease, specifically mesothelioma.

Dr. McClellan is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies. Dr. McClellan 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. McClellan is also expected to testify about the dose responses relationship for asbestosis, lung cancer, and mesothelioma. Dr. McClellan will testify about threshold levels for various diseases. Dr. McClellan may be provided with specific fiber burden studies and asked for his opinions about

those fiber burden studies. Dr. McClellan 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.

Dr. McClellan is expected to testify about his animal studies, the relevance of animal studies to humans, the early animal studies with asbestos, the variability of the production of cancer in various types of experimental animals, and other related matters.

84. Dr. Mark Utell

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Utell has not as yet prepared a report in this case; if he does, a copy will be provided to Plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and, therefore, defendants cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement was served on counsel, and which creates a need for additional areas of rebuttal testimony or proof, defendants reserve the right to supplement this statement.

Dr. Utell is board certified in internal medicine with a subspecialty certification in pulmonary diseases.

Dr. Utell is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity, and the potential for asbestos-related disease as a result of exposures to the different types of fibers. Dr. Utell is expected to testify as to general medical issues and physiology.

Dr. Utell is expected to testify about alleged occupational exposure--as described by plaintiffs' witnesses--and whether such exposure could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Utell is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Utell is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Utell is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

Dr. Utell is expected to testify either live or by deposition concerning plaintiffs medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Utell may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Utell is also expected to testify about any matter raised by experts called by the Plaintiffs or Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

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

14. the lack of a relationship between presence of pleural plaques and a later development of any form of cancer;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the history of evolution and knowledge of asbestos-related diseases;

17. the fiber types and exposure levels considered to be substantial in causing asbestos-related disease, specifically mesothelioma.

Dr. Utell is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies. Dr. Utell 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. Utell is also expected to testify about the dose responses relationship for asbestosis, lung cancer, and mesothelioma. Dr. Utell will testify about threshold levels for various diseases. Dr. Utell may be provided with specific fiber burden studies and asked for his opinions about those fiber burden studies. Dr. Utell 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.

85. Dr. Bruce Case

It is impossible to set forth in precise detail the exact topics and content to 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 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 affect 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. affect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;

14. affect 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.

86. Dr. Cesar Moran

It is impossible to set forth in precise detail the exact topics and content to the testimony of Dr. Moran. Dr. Moran 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. Moran 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. Moran is expected to testify

about the epidemiology of asbestos related diseases and the incidence of disease in both men and women.

Dr. Moran is a pathologist at the University of Alabama, Birmingham. 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. Moran 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. Moran 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 affect 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. affect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;

14. affect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

Dr. Moran is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies. Dr. Moran 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. Moran is also expected to testify about the dose responses relationship for asbestosis, lung cancer, and mesothelioma. Dr. Moran will testify about threshold levels for various diseases. Dr. Moran may be provided with specific fiber burden studies and asked for his opinions about those fiber burden studies. Dr. Moran 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.

87. Mark R. Wick, M.D., F.C.A.P., F.A.S.C.P., F.A.S.D.
Division of Surgical Pathology
Room 3882 Old Medical School

University of Virginia Health Sciences Center
Box 214 Jefferson Park Avenue
Charlottesville, VA 22908

Dr. Wick is Board Certified in Anatomic and Clinical Pathology by the American Board of Pathology. Dr. Wick may provide testimony regarding his examination of plaintiffs' or plaintiffs' decedents' medical records, work history and pathology material. He may also testify regarding the biological effects of asbestos and the evidence of the relationship between the inhalation of various forms of asbestos fibers and asbestos-associated disease and the factors that go into evaluating whether there is any medical risk from asbestos-containing products.

The observations and opinions offered by Dr. Wick in this matter will be based on his review of the materials provided; a continuing review of the available scientific literature relating to the health effects of materials of interest in this matter and Dr. Wick's education and professional experience.

Dr. Wick is expected to provide testimony concerning the anatomic structure and functioning of the lung from a pathologic perspective, the defense mechanisms and functioning of the lung in health and otherwise, the responses of the lung to various stimuli, and the role of various components of the respiratory system in the proper functioning of the lung. Dr. Wick is expected to describe and distinguish various types of asbestos fibers; to describe the things which affect the ability of asbestos fibers to affect various structures within the respiratory system; and to describe the body's specific responses to fibers of asbestos that are inhaled, whether or not they are retained.

It is further believed that Dr. Wick will define and distinguish various conditions, such as asbestosis, pleural changes and other non-malignant changes that may be attributable in some persons to the results of long term inhalation and retention of some forms of asbestos fiber. Dr.

Wick is further expected to be able to testify concerning the circumstances under which exposure to certain forms and types of asbestos may be associated with the incidence of some forms of mesothelioma in some persons, and will testify concerning the results of his own experiences, the medical and scientific literature, and existing epidemiologic studies concerning associations that are alleged to exist epidemiologically between exposure to asbestos in some populations and the mortality and/or incidence of some forms of cancer.

Dr. Wick is further expected to offer testimony concerning the effects of inhaled tobacco smoke and other factors on the occurrence of disease in populations who are also alleged to be exposed to asbestos containing products, and additionally concerning how the effects of inhaled tobacco smoke and other factors can confound the apparent results of certain epidemiologic studies.

Dr. Wick is also expected to testify that it cannot be said, to a reasonable degree of medical probability, that any hypothetical person's alleged "exposure" to products that may have contained asbestos was of importance to that individual, without reference to that specific person's individual work history, medical history, findings on physical examination and pathological examination of tissue, if any, information concerning the individual's use of protective equipment, specific types of asbestos containing product(s) used and/or handled, resolution of questions regarding exposures to substances other than asbestos-containing products, and other known etiologies for whatever conditions are found to exist.

It is further expected that Dr. Wick's testimony will generally respond to the pathologic, scientific and epidemiologic testimony which may be offered by plaintiffs' experts, and in that sense his testimony is dependent upon the prior testimony of such experts and cannot be specifically predicted.

In expressing his opinions, Dr. Wick will rely on his own training, education, experience, research and publications, as well as the published medical and scientific literature that has been available to him over his career.

Dr. Wick may testify as to the general medical aspects of the diagnosis and treatment of asbestos-related disease and the pathological effect of asbestos on the lung. He may also testify as to the relationship of asbestos exposure and the incidence of cancer.

(3). Defendants Deposition Transcripts/Trial Testimony Which May Be Read At Trial

1. Dr. Corwin Hinshaw, December 18 and 19, 1990, videotape deposition; U.S. District Court for the Southern District of Mississippi; Lelos Wedgeworth v. Armstrong Cork, et al., Civil Action Number J78-002(N) and other cases consolidated therewith.

2. Dr. Alton Ochsner, September 11 and 12, 1980, deposition; U.S. District Court for the Southern District of Mississippi, Southern Division; L.T. Chapin, et al. v. ACandS, Civil Action Number 579-0272.

3. Dr. Forde A. McIver, February 26, 1980, videotape deposition; U.S. District Court, District of South Carolina, Charleston Division; In Re: Asbestosis.

4. Dr. Nicholas Sargent, August 1, 1986, videotape deposition; Pasadena, California.

5. Dr. James Pearle, July 31, 1986, videotape deposition; Anaheim, California.

6. Willis Hazard, February 11, 1981, deposition, Toledo, Ohio.

7. Deposition of Forde A. McIver, M.D., dated September 15, 1978 (Vols. I and II); Lollie Hendrix, Widow of Eugene Hendrix, and as Administratrix of the Estate of Eugene Hendrix, Deceased, v. Combustion Engineering, Inc., et al.; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV177-167.

8. Deposition of Henry C. Barron, Jr., dated October 15, 1980; Ralph G. Watson, et al. v. The Celotex Corporation, et al.; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV179-240.

9. Deposition of Henry C. Barron, Jr., dated October 16, 1980; Ralph G. Watson, et al. v. The Celotex Corporation, et al.; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV179-240.

10. Deposition of Henry C. Barron, Jr., dated December 11, 1980; Ralph G. Watson, et al. v. The Celotex Corporation, et al.; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV179-240.

11. Deposition of H. Clarence Barron, Jr., dated September 15, 1981; In Re: Asbestosis Cases; United States District Court for the Southern District of Georgia, Savannah Division; Civil Action File Nos. CV479-267, CV479-312, CV479-326, CV479-332, CV480-97, CV479-287, CV479-313, CV479-327, and CV479-334.

12. Deposition of Andrew T. Haas, dated August 22, 1980; In Re: Asbestos Cases; United States District Court for the Northern District of Georgia, Atlanta Division; Civil Action File Nos. CV79-1385-A, CV77-633-A, CV77-111-A, CV77-632-A, and CV79-2036-A; In Re: Asbestos Cases; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV176-166; and In Re: Asbestos Cases; United States District Court for the Southern District of Georgia, Savannah Division.

13. Deposition of Roy J. Steinfurth, dated August 12, 1980(2 volumes); In Re: Asbestos Cases; United States District Court for the Southern District of Georgia, Augusta Division; Civil Action File No. CV176-166; United States District Court for the Northern District of Georgia, Atlanta Division; Civil Action File Nos. CV79-1385-A, CV77-633-A, CV77-111-A, CV77-632-A, CV79-2036-A, and United States District Court for the Southern District of Georgia, Savannah Division.

14. Trial testimony of August Pocius; Carol Louise Tuten v. Johns-Manville Sales Corporation, et al.; Circuit Court of the Fourth Judicial Circuit, in and for Duval County, Florida; Case No. 77-13991-CA, Division K.

15. Trial testimony of Dr. Edward A. Gaensler; John Daniel Davis v. Armstrong World Industries, et al.; Circuit Court of Monongalia County, West Virginia; Civil Action File No. 86-C-763.

16. Trial testimony of Dr. W.K.C. Morgan; John Daniel Davis v. Armstrong World Industries, et al.; Circuit Court of Monongalia County, West Virginia; Civil Action File No. 86-C-763.

17. Trial testimony of Dr. Andrew Churg; In Re: Baltimore City Personal Injury and Wrongful Death Asbestos Cases, Circuit Court for Baltimore City, Consolidated File No. 89236704.