

FILE NAME: Exxon (EXX)

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DOCUMENT DESCRIPTION: Email to Barry Castleman with Highlights of the Deposition of Neill Weaver, M.D.

----- Forwarded message -----

From: **Bratt, Mark** <mbratt@weitzlux.com>
 Date: Wed, Jun 7, 2017 at 12:58 PM
 Subject: For your Exxon files
 To: Barry Castleman <barry.castleman@gmail.com>
 Cc: "Ashrafi, Benno" <BAshrafi@weitzlux.com>

Barry,

I am not sure if you have previously been sent the deposition of Dr. Neil Weaver from 2004. If you have, go ahead and ignore this. If you have not then you might find it supplements any information you have related to Exxon's knowledge. Obviously when you have time you should read the entire deposition, but some highlights include:

Dr. Weaver (M.D.) was the medical director for Exxon in the 50s and up to 1964. At that time he became the medical director for the API. He was responsible for the health and safety of the refiner employees (p.300) Weaver considers Bonsib 1937 report prepared for Exxon to be an outstanding document with respect to recognizing potential problems and taking corrective measures and considers it an excelled and thorough report (p.82-83; 333). He admits that Bonsib 1937 specifically deals with asbestos exposure as well as other dust exposures (83-83). He admits it makes suggestions for control and suppression of dust including asbestos (84). He admits that good work practices for protecting workers from asbestos were established in Bonsib 1937 report (227-229). He admits that Bonsib notes it is critical to remove visible dust from the air, but even then refineries should remove the most harmful invisible dust (308; 333-335). He admits that the recommendation for control of asbestos dust made by Exxon in 1937 Bonsib were all feasible at that time (336-337). He admits that a company should take precautions to protect workers from health hazards even if the government doesn't make them do it (338). He admits the scientific and medical community established a link between asbestos and meso by 1955 and certainly by the 60s (218; 226-227). He admits there is no known safe level of exposure to asbestos and there is not a big deal difference between fiber types (198-200; 253-254).

Take care,

Mark

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