



23RD JUDICIAL DISTRICT COURT
PARISH OF ASCENSION
STATE OF LOUISIANA

EDWARD "NED" BENTON and * SUIT NUMBER 53846
MARGUERITE R. BENTON *

VERSUS *

OWENS/CORNING FIBERGLAS *
CORPORATION, ET AL. *

* * * * *

DEFENDANT EXXON'S RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT EXXON
CORPORATION, ET AL.

TO: Plaintiffs
Through their attorneys of record
Robert A. Arledge
J. Burton LeBlanc, IV
Arledge & LeBlanc
The Essen Centre
Suite 420
5353 Essen Lane
Baton Rouge, LA 70809

NOW INTO COURT, through undersigned counsel, comes Defendant
Exxon Corporation, who hereby responds to Plaintiff's First Set
of Requests For Production of Documents Propounded to Defendants
Exxon Corporation, et al., as follows:

General Objections to Plaintiff's Requests For Production:

(1) Exxon objects to unqualified use of the term "threshold
limit value," in that this term is ambiguous and, in the context
of its use over past decades, could have conflicting meanings.

(2) Exxon objects to responding as to all or any of its
facilities in operation during the relevant years, and will
respond only as to its Baton Rouge facilities, where Plaintiff
allegedly worked, and during the time Plaintiff allegedly worked
there.

(3) Exxon objects to Plaintiff's definition of whom may be
included among "executive officers," but in any event Exxon
cannot respond for executive officers to the extent that

responsive to this Request which are relevant to the 1951-61 time period which are available for Plaintiff's counsel's inspection.

9. Object to the extent this Request seeks overly broad and irrelevant information as to "any other type of cancer" without limitation to time or geography. Without waiving and subject to these objections, Exxon in the 1951-61 time period was not aware of any diagnoses of occupational asbestos-related disease in any worker at its Baton Rouge facilities.

10. Object that this Request is overly broad, vague, not reasonably calculated to lead to the discovery of admissible evidence, and presupposes that Exxon had a duty to or in fact did engage in toxicological testing of asbestos when Exxon is not an asbestos manufacturer.

11. Object that this Request is overly broad, vague, not reasonably calculated to lead to the discovery of admissible evidence, and presupposes that Exxon had a duty to or in fact did engage in toxicological testing of asbestos when Exxon is not an asbestos manufacturer.

12. Object that the Request is overly broad, vague, ambiguous, not reasonably calculated to lead to the discovery of admissible evidence, and harassing; without waiving and subject to the above objections, Exxon possesses responsive documents pertaining to its Baton Rouge facilities in the 1951-61 time period, and these are available for Plaintiff's counsel's inspection.

13. Object that the Request is overly broad, vague, ambiguous, not reasonably calculated to lead to the discovery of admissible evidence, and harassing; without waiving and subject to the above objections, Exxon possesses responsive documents pertaining to its Baton Rouge facilities in the 1951-61 time period, and these are available for Plaintiff's counsel's inspection.

14. Object that the Request is overly broad, vague, ambiguous, not reasonably calculated to lead to the discovery of admissible evidence, and harassing; without waiving and subject to the above objections, Exxon possesses responsive documents pertaining to its Baton Rouge facilities in the 1951-61 time period, and these are available for Plaintiff's counsel's inspection.

15. Object that this Request is blatantly overbroad and impossible to comply with.

16. Object that the Request is overly broad, vague, ambiguous, not reasonably calculated to lead to the discovery of admissible

28. Object that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective dates of O.S.H.A. regulations.

29. Object that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective date of the Clean Air Act and similar statutes enforced by E.P.A., and Exxon is not aware that any relevant regulations pertaining to the use of asbestos at Baton Rouge facilities had been promulgated by the other listed authorities in the 1951-61 time period.

30. Object that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective dates of O.S.H.A. regulations.

31. Object that this Request is blatantly overbroad and impossible to comply with, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, harassing, and overly burdensome; also object to the extent that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective dates of O.S.H.A. regulations.

32. Object that this Request is blatantly overbroad and impossible to comply with, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, harassing, and overly burdensome; further object that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective date of the Clean Air Act and similar statutes enforced by E.P.A., and Exxon is not aware that any relevant regulations pertaining to the use of asbestos at Baton Rouge facilities had been promulgated by the other listed authorities in the 1951-61 time period.

33. Object that this Request is blatantly overbroad and impossible to comply with, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, harassing, and overly burdensome; further object that this Request is irrelevant on its face because Plaintiff alleges to have left employment at Exxon's facilities roughly ten years before the effective date of the Clean Air Act and similar statutes enforced by E.P.A., and Exxon is not aware that any relevant regulations pertaining to the use of asbestos at Baton Rouge facilities had been promulgated by the other listed authorities in the 1951-61 time period.

34. Object that this Request is overly broad, vague, irrelevant, and not reasonably calculated to lead to the discovery of

43. Exxon will make any responsive documents pertaining to the Baton Rouge facility available for inspection by Plaintiff's counsel.

44. Object that this Request is vague, blatantly overbroad and impossible to comply with as worded, and irrelevant.

45. This Defendant is not aware of any responsive documents in its possession.

46. Object that this Request is vague, blatantly overbroad and impossible to comply with as worded, and irrelevant; also object that press releases are public record available to Plaintiffs.

47. See 46 above.

48. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

49. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

50. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

51. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

52. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

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56. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

57. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

58. Object that this Request calls for a legal conclusion; without waiving and subject to the above objection, this Defendant is aware of none.

59. Object that the Request seeks information which is irrelevant and intended only to harass and burden this Defendant.

60. Exxon has designated no expert witnesses at this time.

61. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant and intended only to harass and burden this Defendant.

62. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant and intended only to harass and burden this Defendant.

63. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant and intended only to harass and burden this Defendant.

64. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant and intended only to harass and burden this Defendant.

65. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant and intended only to harass and burden this Defendant.

66. Exxon will make available for inspection by Plaintiff's counsel responsive documents in its possession pertaining to its Baton Rouge facility.

[No Requests No.s 67 through 78]

79. Exxon is not aware of the existence of such documentation.

80. Object that the Request is blatantly overbroad and overinclusive on its face, and seeks information which is irrelevant; without waiving and subject to this objection, Exxon will make available for Plaintiff's counsel's inspection

responsive documents in its possession pertaining to the Baton Rouge facility during the relevant time period of 1951-61.

81. Object that the Request is blatantly overbroad and overinclusive on its face (eg., "health effects of product located at your facility"), and seeks information which is irrelevant and intended only to harass and burden this Defendant, and is not reasonably calculated to lead to the discovery of admissible evidence.

82. Exxon is not aware that responsive documents, if they ever existed, still exist.

83. Object that this Request is vague, blatantly overbroad and impossible to comply with as worded, and irrelevant.

84. Exxon is searching for responsive documents and will supplement as appropriate under the rules of court.

85. Object that this Request is vague, blatantly overbroad and impossible to comply with as worded, and irrelevant.

86. Object that this Request is vague, blatantly overbroad and impossible to comply with as worded, unclear in meaning (i.e., "extreme adverse ambient conditions"), and irrelevant.

87. None applicable to Exxon's knowledge.

88. Exxon will make responsive documentation in its possession available for inspection to Plaintiff's counsel.

89. The document requested is being sent regular mail to Plaintiff's counsel.

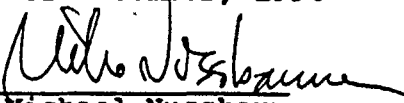
Respectfully submitted on
behalf of the Defendant Exxon
Corporation by:


J. Michael Nussbaum
TX Bar No: 15143520
Exxon Co. U.S.A.
Room 3975E
800 Bell Street
Houston, TX 77002
(713) 656-5433

Certificate of Service

I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by depositing same in the United States Mail, postage prepaid and properly addressed.

Houston, Texas, this 2nd day of December, 1994


J. Michael Nussbaum

Rec'd 1/14/84

23RD JUDICIAL DISTRICT COURT

PARISH OF ASCENSION

STATE OF LOUISIANA

EDWARD "NED" BENTON and * SUIT NUMBER 53846
MARGUERITE R. BENTON

VERSUS *

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CORPORATION, ET AL

* * * * *

**PLAINTIFF(S) FIRST SET OF REQUEST FOR
PRODUCTION OF DOCUMENTS
PROPOUNDED TO DEFENDANT, EXXON CORPORATION,
HENRY VOORHIES AND FICTITIOUS PARTY NO. 1**

TO: EXXON CORPORATION
Mr. Henry Voorhies
Fictitious Parties, No. 1
Through Their Attorneys of Record:
Mr. Gary A. Bezet
Ms. Barrye K. Panepinto
**KEAN, MILLER, HAWTHORNE,
D'ARMOND, McCOWAN & JARMAN**
Post Office Box 3513
Baton Rouge, Louisiana 70821-3513

NOW INTO COURT, through undersigned counsel, comes Plaintiff(s), Edward O. Benton and Marguerite Benton, who hereby request that the Defendants, Exxon Corporation, Henry Voorhies, and Fictitious Party No. 1, answer this Request for Production of Documents within fifteen (15) days from the date of these requests.

DEFINITIONS

As requested in this document, the following terms mean:

- (1) "DOCUMENT" refers to all written or graphic matter, however produced or reproduced, of every kind and description in the actual or constructive possession, custody, care or control of the Defendant(s), Exxon Corporation, Henry Voorhies, and Fictitious Party No. 1, including, without limitation, all papers, books, records, letters, memoranda, contracts, agreements, invoices, receipts, canceled checks, drawings, sketches, graphs, charts, computer data, magnetic tape, magnetic discs, magnetic strips, optical character, recognition characters, punched paper tapes, punched cards, microfiche, microfilm, telegrams, statements, account recommendations, notes,

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7222

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minutes, inter-office memoranda, intra-office memoranda, reports, studies, results of studies, abstracts of studies, summaries of studies, opinions, interpretations, ledgers, books of accounts, vouchers, hotel charges, cost sheets, stenographers notebooks, calendars, appointment books, diaries, timesheets or logs, computer printouts, computer files, data compilations from which information can be obtained or can be translated through detection devices into reasonably usable forms, film, videotape, audiotape, photograph, negatives of photographs, lithographs, judgments, decrees, verdicts, depositions, examinations, warrants, writs, pleadings, blueprints, x-rays, maps, plans, deeds, agreements, manifests, bills of lading, trip tickets, waste profile sheets, material dispatch reports, waste analysis plants, complaint procedures, schedules, job descriptions, hazardous waste management training forms, results of analysis of samples of any and all kind, chain of custody forms and records, analytical methods, sampling methods and protocols, material safety data sheets, chromatograms, chromatographs, mass spectra graphs, laboratory notebooks, indices, statistical evaluations, and writings of each and every kind, including, but not limited to, all drafts, originals, copies, reprints, and duplications, and any other tangible thing which constitutes or contains matter within the scope of the Louisiana Code of Civil Procedure.

2. **"PLAINTIFFS"** means the Plaintiffs named in this suit, Edward O. Benton and Marguerite Benton. **"PLAINTIFF"** means the Plaintiff, Edward O. Benton.
3. **"THRESHOLD LIMIT VALUE"** should be understood as including "permissible exposure limits".
4. **"YOU", "YOURS", "YOUR COMPANY"** or **"DEFENDANTS"**, unless limited by the wording of the question, should be understood as referring to the named Defendants upon whom this Request for Production of Documents is being served, including all parent corporations, subsidiaries, divisions, predecessors in interest, successors in interest, and including the directors, officers, employees, agents, servants, and representatives of these companies, inclusively.
5. **"FACILITY"** refers to the entire facilities operated by the Defendants at any time between 1951 to 1961, and is not limited to the Exxon Refinery in Baton Rouge, Louisiana, previously known as the Humble Oil Refinery and the Standard Oil Refinery.
6. **"EXECUTIVE OFFICERS"** include Chief Executive Officers, Presidents, Vice-Presidents, Department Heads, Medical Directors, Industrial Hygienists, Safety Personnel, Superintendents, Nurses and/or Supervisors of your company.
7. **"ASBESTOS"** refers to technical asbestos and/or any asbestos containing products.
8. **"EXPOSURE"** refers to the condition of subjecting an individual through inhalation, absorption, ingestion, and/or having the individual work in or around any asbestos containing products or asbestos itself.

INSTRUCTIONS

1. In responding to the following Request for Production of Documents, please produce not only those documents in your possession, but also those held by your agents, employees

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7222

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or representatives, or by your attorney(s), their agents, employees or representatives for inspection and/or copying.

2. If for any reason you are unable to respond to any of the Request for Production of Documents in full, please respond to the fullest possible extent, specifying the reasons for your inability to fully respond.
3. These Request for Production of Documents are directed to any and all responsive documents this Defendant(s) possesses - at any locations. Unless the terms of these requests are so limited, they should not be understood to be limited as to documents generated, maintained, or stored at your facility. Neither should they be understood as limited to documents generated, maintained or stored at your facilities.
4. Each Request for Production of Document is of a continuing nature. If, after making your response to any Request for Production of Document, you obtain or become aware of any further document(s) that are responsive to such request, please produce such additional document(s) as have come into your possession for inspection and/or copying.
5. These Request for Production of Documents are intended to generate for inspection and/or copying any document(s) which you possess.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce any and all documents of whatever kind or nature which related to Plaintiff and the work he performed at your facility and/or his illness.
2. Please produce any and all documents including, but not limited to, industrial hygiene personal monitoring reports, which any way reflect the nature and extent of Plaintiff's exposures to asbestos between 1951 and 1961 at your facility.
3. Please produce all first aid and/or medical report forms which concern the Plaintiff.
4. Please produce the Plaintiff's entire personnel and medical file.
5. Please produce any and all Material Safety Data Sheets, warning labels, precautionary statements, and product specification documents you possess that concern asbestos.
6. Please produce any and all books, texts, reports, studies, drafts or other documents you possess which in any way relate to the potential adverse health effects of exposure to asbestos.
7. Please produce any and all documents associated with the Defendant's facilities that in any way concern or related to the medical testing protocols, procedures and policies for the biological testing of individuals exposed or potentially exposed to asbestos.
8. Please produce any and all first aid reports which reflect employee exposures to asbestos at your facilities between 1951 and 1961.
9. Please produce any and all studies, inquiries, memoranda, etc., generated as a result of or from the Defendant's medical records that concerns any type of asbestosis, asbestos related pleural disease, mesothelioma, lung cancer, and/or any other type of cancer diagnosed in any of your former or present employees (wherever located).

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7212

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10. Please produce all toxicological testing data, reports, studies, drafts and other documents in your possession, or of which you are aware of, which in any way discuss toxicological testing of asbestos, whether conducted by you or others. This should include, but is not limited to, acute, sub-acute, chronic, range finding, experimental and/or other types of studies, including those on humans, animals and/or other mammalian test systems.
11. Please produce any and all documents in your possession which in any way concern or relate to toxicological testing of asbestos.
12. Please produce an index or summary of your corporate records or other documents you possess which contain any reference to the presence of asbestos at your facility.
13. Please produce an index or summary of your corporate records or other documents you possess which contain any reference to the adverse health effects of asbestos.
14. Please produce an index or summary of your corporate records or other documents you possess which contain any reference to the safety/industrial hygiene program in place at your facility.
15. Please produce an index or bibliography of any and all books, texts, reports, studies, drafts or other documents which you possess or which, in the past, you have possessed, which in any way relate to the potential adverse health effects of exposure to asbestos.
16. Please produce an index or bibliography of any and all books, texts, reports, studies, drafts or other documents which you possess by virtue of your membership to any trade association, industry or industrial safety association, organizations, foundations, or institute.
17. Please produce any and all documents which in any way reflect any industrial hygiene air sampling results, whether personal and/or area samples, for which asbestos was analyzed, whether the monitoring was conducted by you or others, for the time period 1951 to 1961. This is to include industrial hygiene monitoring conducted on all persons including, but not limited to, Defendant's employees, who worked at the Defendant's facilities. Please include the industrial hygiene sampling and the laboratory analytical protocols.
18. Please produce any and all documents that in any way concern or relate to industrial hygiene air sampling (including its scope, reduction or elimination) within Defendant's facility from 1951 to 1961 for asbestos.
19. Please produce any and all epidemiological studies for the Defendant's facility from 1951 to 1961, whether conducted by you or by others, whether published or unpublished, whether preliminary or final, which in any way include people exposed to asbestos.
20. Please produce the documents in your possession, which in any discuss, mention, or otherwise concern any proposed, anticipated, ongoing or completed epidemiological study of the Defendant's facility employees and/or contractors from 1951 to 1961, who are or were in any way involved in the use of asbestos and/or asbestos containing products.
21. Please produce any and all epidemiological studies which you possess, conducted by anyone, whether published or unpublished, whether preliminary or final, which in any way include people exposed to asbestos or asbestos containing products.

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7222

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22. Please produce any and all documents you have exchanged or received from any company, person or other entity, which relates to any potential or alleged adverse health effects caused by asbestos exposure.
23. Please produce any and all documents which relate to the participation of any of your past or present employees in any industry or industrial safety associations, organizations, foundations, institutes, or other groups that your company was, or is a member of, participated in, or was otherwise associated with between 1951 to 1961.
24. Please produce any and all documents from or to any trade organization, industry or industrial safety associations, organizations, foundations, institutes (including, but not limited to, Industrial Health Foundation or the National Safety Council, etc.), that your company was, or is, a member of, participated in, or was otherwise associated with between 1951 to 1961 which in any way concerned, dealt with, discussed or otherwise mentioned:
- (a) health and safety matters; and
 - (b) health and safety matters relating to asbestos exposure.
25. Please produce any and all documents that discuss whether this Defendant did or did not (would or would not) participate in any of the industry or industrial safety associations, organizations, foundations, institutes, or other groups listed above.
26. Please produce any and all documents sent to management and/or hourly employees that concern this Defendant's participation in any of the industry or industrial safety associations, organizations, foundations, institutes, or other groups listed above.
27. Please produce all documents, records, letters, memoranda, and/or other document which in any way relates to your company's compliance, non-compliance or obligation to comply with O.S.H.A. regulations for asbestos and/or asbestos containing products at your facility.
28. Please produce any record of whatsoever kind or type which you maintain indicates or reflects your compliance with O.S.H.A. regulations for asbestos and/or asbestos containing products at your facility.
29. Please produce any documents, records, letters, memoranda and/or any other document which in any way relates to your company's compliance, non-compliance or obligation to comply with Governmental (including, but not limited to United States Environmental Protection Agency, Louisiana Department of Environmental Quality, and the Louisiana Department of Natural Resources) regulations pertaining to the use of asbestos and/or asbestos containing products at your facility.
30. Please produce any and all documents, including, but not limited to, policies and memoranda, writings or drafts that pertain to and/or response to any changes or proposed changes to any O.S.H.A. Safety and Health rules, regulations or standards that are associated with asbestos and/or asbestos containing products.
31. Please produce any and all citations which you have received from O.S.H.A., the U. S. Department of Labor, or any other State or Federal agency pertaining to your alleged non-compliance with State or Federal regulations concerning safety in your work place.
32. Please produce any and all administrative orders, compliance orders, penalty notices, and notice of violation which you have received from O.S.H.A., E.P.A., D.E.Q., and/or any other governmental agency as a result of any alleged violations

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7222

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medical, safety and economic matters associated with this case.

61. Please produce all shift supervisors logs for your facility for the years 1951 to 1961.
62. Please produce all chief operators logs for your facility for the years 1951 to 1961.
63. Please produce each and every document of any type which your company possesses which concerns or addresses the potential harmful effects of exposure to asbestos and/or asbestos containing products.
64. Please produce all organizational charts which list the names and positions of your various executive officers for the years 1951 to 1961.
65. Please produce copies of all contracts, sales agreements and/or invoices between you and any agency and/or subdivision of the government of the United States of America executed at any time prior to 1961.
66. Please produce any and all documentation reflecting the protective clothing and/or protective gear your company requires of or provided to individuals working with and/or around asbestos and/or asbestos containing products from 1951 to 1961.
79. Please produce any and all documentation and/or other written tangible matter reflecting the total amount of asbestos and/or asbestos containing products utilized at your facility from 1951 to 1961.
80. Please produce all asbestos ambient air monitoring data at your company's facility including any and all documentation and/or other written tangible matter concerning the analytical results of all ambient air samples collected in regards to air monitoring, chain of custody, sampling, perimeters, information showing the type of collection device and all quantitative and qualitative documents generated from said monitoring.
81. Please produce any and all documentation and/or other written tangible matter which your facility provided to the Plaintiff regarding asbestos and/or asbestos containing products, handling procedures, and health effects of products located at your facility.
82. Please produce any and all documentation and/or other written tangible matter reflecting employee suggestions from suggestion boxes concerning need modification to procedures utilized in the fabrication, installation and/or removal of asbestos and/or asbestos containing products.
83. Please produce any and all documents which contain standards promulgated by industry, trade or professional organizations covering procedures for handling, fabricating, installation and/or removal of asbestos and/or asbestos containing products.
84. Please produce descriptions of any modification utilized to reduce exposure to asbestos and/or asbestos containing products at your facility from 1951 to 1961.
85. Please produce all studies which your company knows of or has knowledge of concerning safety issues regarding asbestos exposure.
86. Please produce any and all documentation and/or other written tangible matter in your custody or control of any professional knowledge of studies your company is aware of about permeation and/or breakthrough of asbestos fibers in relation to protective clothing and breathing masks under normal and/or extreme adverse

ARLEDGE &
LEBLANC
5353 Easton Lane
The Easton Centre
Suite 420
Baton Rouge, Louisiana
70819
(504) 763-7222

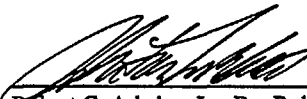
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ambient conditions.

87. Please produce copies of any and all comprehensive liability insurance policies in force and effect from 1951 to 1961.
88. Please produce any and all documents which purport to describe your mask fit testing and/or training programs.
89. Please produce a copy of the "Bonsib Report".

All of the foregoing Request for Production of Documents are to be deemed continuing in nature and must be supplemented if further information is obtained.

By His Attorneys,



Robert C. Arledge, La. Bar Roll Number 19465
J. Burton LeBlanc, IV, La. Bar Roll Number 20491
ARLEDGE & LeBLANC
The Essen Centre, Suite 420
5353 Essen Lane
Baton Rouge, Louisiana 70809
Telephone: (504) 768-7222

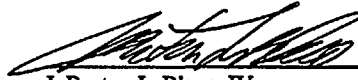
**ARLEDGE &
LEBLANC**
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70809
(504) 768-7222

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument has been served, via U. S. Mail, proper postage pre-paid, to all known attorneys or record on this 12th day of November, 1994.



J. Burton LeBlanc, IV

ARLEDGE &
LEBLANC
5353 Essen Lane
The Essen Centre
Suite 420
Baton Rouge, Louisiana
70819
(504) 763-7222

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