



NO. 98-748-A

GEORGE JOSEPH DOLEZAL; ET AL	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
VS.	§	NUECES COUNTY, TEXAS
	§	
OWENS CORNING, et al.	§	
	§	
Defendants.	§	28TH JUDICIAL DISTRICT

**ALCOA, INC.'S RESPONSES TO PLAINTIFF'S
REQUESTS FOR DISCLOSURE PURSUANT TO RULE 194**

Defendant Alcoa, Inc. ("Alcoa") now serves its Response to Plaintiff's Requests for Disclosure Pursuant to Rule 194.

Rule 194.2(a) Request. The correct names of the parties to the lawsuit.

RESPONSE:

Effective January 1, 1999, the proper name for this defendant is Alcoa, Inc. Alcoa does not know the correct names of all of the other parties to this lawsuit. The other parties, including plaintiffs, are presumably knowledgeable regarding their proper names.

Rule 194.2(b) Request. The name, address, and telephone number of any potential parties.

RESPONSE:

At this time, based upon the limited information available to Alcoa regarding the plaintiff or plaintiffs that have filed suit against it, Alcoa is not aware of any additional potential parties. Additional parties may include the manufacturers that produced products that were purchased by ALCOA for use in its plants. Further investigation will need to be done once Alcoa learns of the

particular work location of the plaintiff. To the extent Alcoa learns that applicable indemnity agreements exist, Alcoa may join the employers and/or contractors that have agreements with Alcoa.

Rule 194.2(c) Request. The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

RESPONSE:

With respect to plaintiff(s)' claims of negligence, negligence per se, gross negligence and/or intentional tortious conduct, Alcoa states that it at all relevant times has acted reasonably in investigating the potential dangers of exposure to asbestos and/or asbestos-containing products. Additionally, Alcoa reasonably provided adequate protection at its plants to prevent workers from being exposed to asbestos dust in excess of the then applicable exposure limits.

With respect to plaintiff(s)' claims of conspiracy, Alcoa denies that it in any way conspired with the manufacturers of asbestos or asbestos-containing products or other defendants to suppress information relating to the potential hazards of asbestos and/or asbestos-containing products. In fact, Alcoa relied on the warnings or lack thereof from those manufacturers and any information that was withheld from the public at large was likewise withheld from Alcoa. Additionally, Alcoa's Medical, Safety and Industrial Hygiene Departments warned workers of the potential hazards of asbestos exposure. Furthermore, Alcoa monitored the health of its employees through yearly medical examinations and chest x-rays.

With respect to plaintiff(s)' alleged exposure to asbestos and/or asbestos-containing products, Alcoa denies that plaintiff(s)' work at its plant resulted in sufficient exposure to asbestos to result in any asbestos-related disease. Plaintiff(s) also allege(s) such exposure occurred at other premises

owned, occupied or operated by third parties over which Alcoa exercised no control. As such, Alcoa asserts that its conduct is not a direct or proximate cause of any of plaintiffs' alleged injuries.

Furthermore, Plaintiff was in a similar position as Alcoa to know about asbestos exposure because Plaintiff knew or should have known about such exposure from information provided through his employers and union.

By way of additional response, Alcoa has never engaged in the business of selling, manufacturing, producing, designing and/or otherwise placing into the stream of commerce asbestos, asbestos-containing products and/or machinery calling for the use of asbestos and/or asbestos-containing products. As such, many of the allegations contained in plaintiff(s)' petition are inapplicable to this defendant. Furthermore, by way of additional response, see Alcoa's Answer filed in this action.

If it is shown that the plaintiff was at any time an employee of Alcoa, this defendant would show that at all pertinent times it was a subscriber to the applicable state's worker's compensation statute and therefore a direct action for negligence is barred.

Rule 194.2(d) Request. The amount and any method of calculating economic damages.

RESPONSE:

Alcoa will calculate damages according to what is fair and reasonable by community standards, and applying mitigation theories.

Rule 194.2(e) Request. The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

RESPONSE:

See Attachment "A" affixed hereto.

Rule 194.2(f) Request. For any testifying expert:

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

RESPONSE:

Alcoa may consult or retain any of the expert witness included in Attachment "A". Alcoa will supplement this Response when Alcoa identifies additional experts or obtains additional information responsive to this disclosure request. Many of the persons listed as experts have experience and training in the business of Alcoa and the production of aluminum products generally and do not have a formal resume. Their description in attachment "A" contains a description of their experience in the field.

Rule 194.2(g) Request. Any discoverable indemnity and insuring agreements.**RESPONSE:**

Alcoa has indemnity agreements with many contractors. Once Plaintiff has supplied specific work history as to dates, employer and site, Alcoa will be able to provide Plaintiff with information relating to applicable indemnity agreements. As to insuring agreements, coverage has not been determined, and coverage information, if any, will be provided once determined.

Rule 194.2(h) Request. Any discoverable settlement agreements.

RESPONSE:

At this time, Alcoa is unaware of any discoverable settlement agreements related to the current action.

Rule 194.2(i) Request. Any discoverable witness statements.

RESPONSE:

At this time, Alcoa does not possess any discoverable witness statements related to the current action.

Rule 194.2(j) Request. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

RESPONSE:

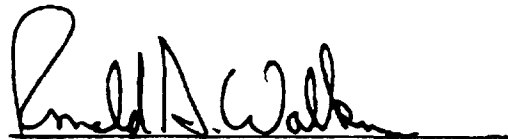
To the extent that Plaintiff (s) alleges an employment relationship with Alcoa, Alcoa will release such records upon the receipt of an authorization from Plaintiff(s) authorizing such disclosure.

Rule 194.2(k) Request. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE:

Alcoa has obtained or may seek such documents with the appropriate authorizations provided by the plaintiffs. If Alcoa has obtained or obtains such documents, these documents will be made available for any party's inspection and/or copying at the offices of LeBoeuf, Lamb, Greene & MacRae, L.L.P., 601 Grant Street, Suite 700, Pittsburgh, Pennsylvania 15219 at a time to be mutually agreed upon by the parties or at 10:00 a.m. fourteen days after the date of the transmittal letter from the court reporter to the requesting party.

By:



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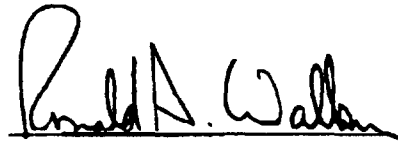
(412) 594-2300

(412) 594-5237 (fax)

ATTORNEYS FOR ALCOA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **ALCOA, INC.'S RESPONSE TO PLAINTIFFS' REQUESTS FOR DISCLOSURE** was served upon all known counsel of record by regular mail, certified mail, and/or facsimile transmission on March 13, 1999.



Ronald A. Waller

ATTACHMENT A
LIST OF EXPERT WITNESSES AND LAY WITNESSES

Carl Hudson
2100 Sager
Rockdale, TX 76567
Phone: 512-446-5495

Mr. Hudson is currently the Director of Personnel at Alcoa Rockdale. He has had various previous assignments throughout Alcoa. He will testify that Alcoa employees were covered under the appropriate Worker's Compensation statute during the relevant time periods. During Mr. Hudson's tenure at Alcoa he has handled safety discussions and will testify concerning the safety awards received by Alcoa Rockdale, Alcoa corporation generally and Alcoa plants throughout the world. Mr. Hudson will testify concerning the safety statistics and the safety record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities.

He will also testify concerning the aluminum smelting process generally. He will testify concerning communications with the union regarding safety issues. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and procedures. He will testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa.

Mr. Hudson is involved with the management discussions concerning the economic viability of any smelter or other Alcoa facility and the comparison of profitability between that plant and others that exist anywhere in the world. Mr. Hudson will testify as to the economic issues admissible in the punitive damages phase (if any) of the trial. He will discuss the capital expenditure on health and safety yearly at the Alcoa Rockdale plant and similar facilities owned by Alcoa.

Mr. Hudson will further testify to the involvement of Alcoa Rockdale in the community and Alcoa's contribution to charities and other non profit organizations that benefit the citizens in the area.

In addition to offering factual testimony, Mr. Hudson may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

2. Tommy Gibson
P.O. Box 2511
Albemarle, NC 28001
Phone: 704-983-3715

Mr. Gibson is currently the Director of Safety at Alcoa Badin with various previous assignments throughout Alcoa. During Mr. Gibson's tenure at Alcoa he has handled safety discussions and will testify concerning the safety awards received by Alcoa Badin, Alcoa corporation generally and Alcoa plants throughout the world. Mr. Gibson will testify concerning the safety statistics and record of Alcoa Badin as it is compared to other industries both similar and dissimilar in the United States. He will discuss the capital expenditure on health and safety yearly at the Alcoa Badin plant and similar facilities owned by Alcoa. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities. He will testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa. He will testify that Alcoa employees were covered under the appropriate Worker's Compensation statute during the relevant time periods.

He will testify concerning the aluminum smelting process generally. Mr. Gibson has served as a potroom, electrode, and ingot engineer and will testify regarding the procedures in the pot room at various times. He will testify as to employees' potential exposure to asbestos-containing products during the pot lining operation. Further, he will testify concerning the frequency with which a potman may be exposed to asbestos during the pot lining operation.

Additionally, Mr. Gibson will testify concerning present and past management-union contracts and the labor relations policies and procedures. He will testify concerning the communication with the union for employees concerning safety issues.

Mr. Gibson is involved with the management discussions concerning the economic viability of any smelter or other Alcoa facility and the comparison of profitability between that plant and others that exist anywhere in the world. Mr. Gibson will testify as to the economic issues admissible in the punitive damages phase (if any) of the trial. Mr. Gibson will testify to the involvement of Alcoa Badin in the community and Alcoa's contribution to charities and other non profit organizations that benefit the citizens of Stanley County.

In addition to offering factual testimony, Mr. Gibson may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Earl Morgan, Jr.
P O Box 552
Badin, NC 28009
Phone: 704-422-3179

Mr. Morgan is a former employee of ALCOA who served as an engineer in the potroom and the ingot plant at Alcoa Badin. He will testify concerning the aluminum smelting process generally. He will testify as to the exposure to asbestos containing products from the pot lining operation. Further, he will testify

concerning the frequency with which a potman may be exposed to the pot lining operation. Mr. Morgan also conducted air sampling dust tests in the 1970s and are reflected in exhibit 2415 and other documents previously produced in both Cavitt v. Alcoa and Gilbert v. Alcoa. If counsel is unable to locate such documents they will be provided upon request. Mr. Morgan has expertise in the sampling of air in and around the Badin plant. Further opinions and information can be found in this witness' deposition given in Gilbert v. Alcoa. If counsel does not have access to this deposition it will be provided upon request. In addition to offering factual testimony, Mr. Morgan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Charlie T. Barger, Jr.
425 N. Tenth Street
Albemarle, NC 28001
Phone: 704-982-4826

Mr. Barger is a former employee of Alcoa who served as an engineer in the ingot plant at Alcoa Badin. Mr. Barger will testify based on his experience and training concerning the policies and procedures in the ingot plant and Alcoa plants with similar facilities. He will testify concerning the aluminum smelting process generally. Further opinions and information can be found in this witness' deposition given in Gilbert v. Alcoa. If counsel does not have access to this deposition it will be provided upon request. In addition to offering factual testimony, Mr. Barger may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Al Powell
P. O. Box 1538
Badin, NC 28009
Phone: 704-982-9706

Mr. Powell is a current employee at Alcoa Badin. He is an engineer who has experience and training in the ingot plant and will testify concerning the processes and procedures in the plant and the infrequent handling of asbestos containing products. He will testify concerning the aluminum smelting process generally. Further opinions and information can be found in this witness' deposition given in Gilbert v. Alcoa. If counsel does not have access to this deposition it will be provided upon request. In addition to offering factual testimony, Mr. Powell may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Robert Hinkle, Jr.
P O Box 446
Badin, NC 28009
Phone: 704-422-3079

Mr. Hinkle is a former employee at Alcoa Badin who was the supervisor of health and hygiene. Mr Hinkle is an engineer with experience, training and education in the field of chemistry. He will testify concerning the aluminum smelting process generally. Further opinions and information can be found in this witnesses deposition given in Gilbert v. Alcoa. If counsel does not have access to this deposition it will be provided upon request. In addition to offering factual testimony, Mr. Hinkle may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Ed Julian
24548 Strand Drive
Albemarle, NC 28001
Phone: 704-982-5574

Mr. Julian is a current Alcoa employee with experience and training in the handling of asbestos containing materials as manager of the storeroom. Further opinions and information can be found in this witness' deposition given in Gilbert v. Alcoa. If counsel does not have access to this deposition it will be provided upon request. In addition to offering factual testimony, Mr. Julian may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jerry Mitchell
1901 O'Kelley
Rockdale, TX 76567
Phone: 512-446-2130

Mr. Mitchell is an engineer at Alcoa Rockdale with experience and training as to the ventilation and other air handling systems in the potroom and similar facilities at Alcoa smelters. He will testify concerning the aluminum smelting process generally. Further, he will testify concerning the frequency with which a potman may be exposed to the pot lining operation. He will discuss the insulation used in the Alcoa Rockdale plant and how it was used and is currently used in the plant and similar facilities owned by Alcoa. He will discuss the capital expenditure on health and safety yearly at the Alcoa Rockdale plant and similar facilities owned by Alcoa. In addition to offering factual testimony, Mr. Mitchell may offer specialized or expert testimony. It is anticipated that his

testimony may include "expert testimony," based on his experience, background and training in the field.

Carl Beran
600 R. R. 926
Theall, TX 76578
Phone: 512-898-2667

Mr. Beran is a former employee and medical technician who will testify based on his experience and training about the medical supervision of the employees at Rockdale as well as the medical testing and procedures followed by Alcoa Rockdale and similar facilities owned by Alcoa. He will testify concerning the communication with the physicians in the Rockdale community concerning any adverse findings in the physical examinations of the employees. In addition to offering factual testimony, Mr. Beran may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Gary Griesbach
905 Cady Road
Rockdale, TX 76567
Phone: 512-446-3266

Mr. Griesbach has been employed by Alcoa since 1969. From 1969 - 1973, Mr. Griesbach served as Mechanical Designer Engineer at Alcoa Central Engineering, Fabricating Group, Pittsburgh Office; from 1973 - 1975, Mr. Griesbach served as Mechanical Engineer at Rockdale Aluminum Powder Plant; from 1975 - 1977, Mr. Griesbach served as Senior Mechanical Engineer at Rockdale Aluminum Powder Plant; from 1977 - 1978, Mr. Griesbach served as ALCOA Industrial Professor in Residence at Prairie View A & M University; from 1978 - 1982, Mr. Griesbach served as Division Mechanical Engineer, North Plant, Rockdale Operations; from 1982 - 1990, Mr. Griesbach served as Safety Manager, Alcoa Rockdale Operations; from 1990 to the present, Mr. Griesbach has served as Manager of Safety and Industrial Hygiene at Alcoa Rockdale Operations.

Mr. Griesbach will testify concerning the safety statistics and record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and procedures. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities. He will testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa. He will testify concerning the aluminum smelting process generally. He will discuss the capital expenditure on health and safety yearly at the Alcoa Rockdale plant and similar

facilities owned by Alcoa. During Mr. Griesbach's tenure at Alcoa he has handled safety discussions and will testify concerning the safety awards received by Alcoa Rockdale, Alcoa corporation generally and Alcoa plants throughout the world. He will testify concerning the communication with the union for employees concerning safety issues. Mr. Griesbach will testify concerning the programs for the abatement of asbestos at Alcoa Rockdale. In addition to offering factual testimony, Mr. Griesbach may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

James Green
1907 Mistletoe Lane
Rockdale, TX 76567
Phone: 512-446-6260

Mr. Green is a former Alcoa Rockdale employee who is trained as an engineer and was assigned to the potroom. Through his experience and education, he will describe the policies and procedures in that part of the plant. He will testify concerning the aluminum smelting process generally. He will testify concerning the use and non use of asbestos containing products in the potroom at Alcoa Rockdale and similar facilities owned by Alcoa. He will testify as to the exposure to asbestos containing products from the pot lining operation. Further, he will testify concerning the frequency with which a potman may be exposed to the pot lining operation. In addition to offering factual testimony, Mr. Green may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

J. J. Congleton
130E Zachary
College Station, TX 77843
Phone: 409-845-5574 (Office), 409-690-0737 (Home)

Mr. Congleton is a former employee of Alcoa Rockdale. He is educated as an engineer. Mr. Congleton will testify to his knowledge of industrial hygiene and his knowledge of procedure and processes in the potrooms. He will testify concerning the aluminum smelting process generally. He will testify concerning the processes and procedures of other industries in the United States during the relevant times. He will discuss the asbestos abatement program at Alcoa Rockdale and similar facilities owned by Alcoa. He will discuss the medical surveillance program at Alcoa Rockdale and similar facilities owned by Alcoa. During Mr. Congleton's tenure at Alcoa he has handled safety discussions and will testify concerning the safety awards received by Alcoa Rockdale, Alcoa corporation generally and Alcoa plants throughout

the world. He will testify concerning the communication with the union for employees concerning safety issues. Mr. Congleton will testify concerning the safety statistics and record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities. In addition to offering factual testimony, Mr. Congleton may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Renda Hatley
P.O. Box 205
Richfield, NC 28137
Phone: 704-463-5624

Ms. Hatley is the administrator of the Worker's Compensation program at Alcoa Badin. Her job includes the coordination of the worker's compensation claims and the registration of the program with the state of North Carolina. She previously worked in the potrooms as administrative assistant. As such she has knowledge of the policies and procedures in that area of the plant. In addition to offering factual testimony, Ms. Hatley may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Robert Persons
814 N. 11th
Albemarle, NC 28001
Phone: 704-982-0098

Mr. Persons is an employee at Alcoa Badin and serves as human resource manager. He will identify the personnel files of the persons involved in this litigation as parties or as witnesses. His job includes the coordination of the worker's compensation claims and handling the registration of the program with the state of North Carolina. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and procedures. In addition to offering factual testimony, Mr. Persons may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Maynard Stickney
1303 Calhoun Street
Albemarle, NC 28001
Phone: 704-982-7435

Mr. Stickney was employed at Alcoa's Badin facility from 1956 to 1986 as an Industrial Engineer. He may testify regarding

potential exposure to asbestos resulting from performance of various job functions. In addition to offering factual testimony, Mr. Stickney may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Randall Smith
20535 Old Beatty Ford Road
Gold Hill, NC 28071
Phone: 704-279-4001

Mr. Smith is a current Alcoa Badin employee who is a maintenance supervisor. He previously was a general mechanic and a production worker in the potrooms. He will testify concerning the aluminum smelting process generally. He will testify concerning the communication with the union for employees concerning safety issues. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and procedures. Mr. Smith was a former union president at Alcoa Badin. In addition to offering factual testimony, Mr. Smith may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jerry Roddy
11904 Longstreet Place
Knoxville, TN 37922
Phone: 423-675-4472

Mr. Roddy is a technical manager for Alcoa Primary Metals at the Knoxville Headquarters. He served as a potroom superintendent at Alcoa Rockdale and was assigned at the Pittsburgh Headquarters to develop and implement CORE safety training. He will testify concerning the aluminum smelting process generally. He is trained and educated as an engineer and will testify concerning engineering issues at the Alcoa facilities. In his tenure at Alcoa Rockdale he handled safety discussions and will testify concerning the safety awards received by Alcoa Rockdale, Alcoa corporation generally, and Alcoa plants throughout the world. He will testify concerning the communication with the union for employees concerning safety issues. Mr. Roddy will testify concerning the safety statistics and record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and procedures. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities. He will testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa. He will discuss the capital expenditure on health and

safety yearly at the Alcoa Rockdale plant and similar facilities owned by Alcoa.

In addition to offering factual testimony, Mr. Roddy may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Joseph Damiano
134 Laurel Wood Drive
Pittsburgh, PA 15237
Phone: 412-364-0394

Mr. Damiano has served in a number of industrial hygiene positions at Alcoa's Corporate Offices in Pittsburgh since 1979. In addition to offering factual testimony, Mr. Damiano may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Bruce Cox
1645 Southpoint Lane
New London, NC 28127
Phone: 336-461-2459

Mr. Cox is the plant manager at Alcoa Badin. He is leader of the primary metals safety and health lead team. He is an electrical engineer by education and training and has substantial experience with various engineering and management procedures and processes within Alcoa at many of their facilities. In addition to offering factual testimony, Mr. Cox may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Tim Fitzpatrick
1900 Yokley Drive
Rockdale, TX 76567
Phone: 412-833-6839

Mr. Fitzpatrick is a current employee at Alcoa Rockdale and is an industrial hygienist. Mr. Fitzpatrick will testify concerning the safety statistics and record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. He will also testify concerning the CORE program and its influence on the safety environment in Alcoa facilities. He will testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa. He will testify concerning the communication with the union for employees concerning safety issues. Furthermore, he will testify concerning present and past management-union contracts and the labor relations policies and

procedures. In addition to offering factual testimony, Mr. Fitzpatrick may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jack Drake
1702 Sager
Rockdale, TX 76567
Phone: 512-446-2933

Mr. Drake was a plant manager at Alcoa Rockdale from 1982 to 1993. He was trained and educated as an engineer. He worked at several Alcoa facilities and will testify to many of the policies and procedures followed by Alcoa. In addition to offering factual testimony, Mr. Drake may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Clois Green
1800 Yokley
Rockdale, TX 76567
Phone: 512-446-5472

Mr. Green was an environmental manager for Alcoa Rockdale and is fully knowledgeable of the policies and procedures at Rockdale and Point Comfort. In addition to offering factual testimony, Mr. Green may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jim Richter
P.O. Box 547
Thorndale, TX 76577
Phone: 512-898-2992

Mr. Richter was employed at Alcoa Rockdale employee. He was involved with the current program for air and water sampling. He is trained as a technician. In addition to offering factual testimony, Mr. Richter may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jim Ellis
2002 Yokley Road
Rockdale, TX 76567
Phone: 512-446-2826

Mr. Ellis is employed at Alcoa Rockdale in the maintenance department. He has a knowledge of safety procedures and policies. He is a former union official. He can testify concerning company/union discussions concerning safety, hygiene, medical and other health related issues. In addition to offering factual testimony, Mr. Ellis may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

E. Brooks Parker
306 North Street
Portsmouth, VA 23704
Phone: 757- 397-9448

Mr. Parker is a former environmental superintendent at Alcoa's Rockdale plant. In addition to offering factual testimony, Mr. Parker may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

James G. Phillips
P.O. Box 425
Thorndale, TX 76577
Phone: 512-898-5211

Mr. Phillips is employed at Alcoa's Rockdale plant as a supervisor in the potlining department. He will testify concerning the policies and procedures for potlining. In addition to offering factual testimony, Mr. Phillips may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jon R. Cook
618 Jackson Street
Rockdale, TX 76567
Phone: 512-446-4215

Mr. Cook is the labor relations supervisor at Alcoa's Rockdale plant. He is educated and trained as an engineer. He will testify about the union-management relations, problem solving, resolution of grievances, and the involvement of the union in safety related grievances. He will testify that there were no safety related grievances filed in his tenure with Alcoa Rockdale since 1984. In addition to offering factual testimony, Mr. Cook may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Margaret Zotz
116 Spanish Oak Trail
Cameron, TX 76520
Phone: 254-697-4159

Ms. Zotz is a current Alcoa Rockdale employee handling safety statistics. She is a member of the joint safety and health committee and will testify to their deliberations and actions. In addition to offering factual testimony, Ms. Zotz may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Stan Spell
RT 1 Box 489A
Rockdale, TX 76567
Phone: 512-446-2902

Mr. Spell is a current Alcoa Rockdale employee and is an electrode superintendent. He is trained and educated as a mechanical engineer. He will testify as to the ventilation system in the potroom. He performed the original cutting of marinite in the marinite room and can testify to the design of the marinite room and the dust control system. In addition to offering factual testimony, Mr. Spell may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Bob Turner
RT 1 Box 142B
Rockdale, TX 76567
Phone: 512-446-3862

Mr. Turner has been employed by Alcoa since June 1974. Mr. Turner served as a pilot from 1974 to 1982. Mr. Turner served as Process Control and Safety Training Supervisor at Rockdale Operations from 1982 through 1985. In 1987, Mr. Turner was named a human resource administrator/personnel supervisor. In September, 1998, Mr. Turner became Human Resources Superintendent. He has experience in the potroom and pot lining. He can testify to the working conditions in pot lining and to the tearing down and relining of pots at Alcoa Rockdale. He will also testify about the safety and environmental conditions.

In addition to offering factual testimony, Mr. Turner may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Leon Young
2301 Canyon Creek Drive
Temple, TX 76502
Phone: 254-774-1829

Mr. Young has been employed at Alcoa's Rockdale plant since 1969 in various capacities including Laboratory Analyst, Industrial Hygiene Technician, Environmental Control Technician, and Lab Technician Supervisor. In addition to offering factual testimony, Mr. Young may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Adrian Sandoval
19204 Luedtke Ln.
Pflugerville, TX 78660
Phone: 512-990-1820

Mr. Sandoval has been employed at the Alcoa Rockdale plant since 1981. He served as a Mechanical Engineer responsible for various construction projects from 1981 through 1995. In 1995, Mr. Sandoval became Senior Staff Buyer for the Rockdale plant. In addition to offering factual testimony, Mr. Sandoval may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Joanne Barak
5612 Caroline Drive
Bryan, TX 77807
Phone: 409-823-5192

Ms. Barak has worked as a nurse at the Rockdale facility since 1979. She may testify regarding the physical examination program provided to Rockdale employees. In addition to offering factual testimony, Ms. Barak may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Fred Marshall
2102 Yokley Road
Rockdale, TX 76567
Phone: 512-446-3456

Mr. Marshall has been employed at the Alcoa Rockdale plant since 1964 in various capacities including potline helper, millwright apprentice, millwright, and unit supervisor. In

addition to offering factual testimony, Mr. Marshall may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Robert M. James
1220 Airedale Dr.
Bethel Park, PA 15102
Phone: 412-831-0961

Mr. James has served in a number of managerial positions in Health, Safety and Industrial Hygiene at Alcoa's corporate offices in Pittsburgh since 1979. These positions include Staff Industrial Hygienist, Manager, Health Regulatory Affairs, Manager, Health and Safety, CMPLC and Services; and, currently, Manager, Industrial Hygiene and Toxicology. In addition to offering factual testimony, Mr. James may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jerry Mitchell

Mr. Mitchell has worked for Alcoa since 1970 and transferred to the Rockdale Plant in 1976. He has been employed in a number of capacities including Construction Mechanical Engineer and is currently a Contract Services Administrator. In addition to offering factual testimony, Mr. Mitchell may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dennis Hirt
303 Bounds Avenue
Rockdale, TX 76567
Phone: 512-446-5921

Mr. Hirt has employed at the Alcoa Rockdale plant in various capacities since 1969. Since 1995, he has served as a Unit Supervisor in the Mechanical Maintenance Department. In addition to offering factual testimony, Mr. Hirt may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

W. Fred Gerthe
RT. 2 Box 18-C
Rockdale, TX 76567
Phone: 512-446-2730

Mr. Gerthe has been employed at the Alcoa Rockdale plant since 1965 in various capacities including millwright apprentice, millwright, and maintenance specialist. In addition to offering factual testimony, Mr. Gerthe may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jack Baston
603 Francine Drive
Rockdale, TX 76567
Phone: 512-446-3889

Mr. Baston has been employed at Alcoa since 1970. He has been a general mechanic and a maintenance unit supervisor. In addition to offering factual testimony, Mr. Baston may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Al Glaser
RT. 2 Box 328
Buckholts, TX 76518
Phone: 817-593-4108

Mr. Glaser is a current Alcoa employee. He began working at the Rockdale facility in 1969 as an electrician. He is currently employed as a unit supervisor Power System. In addition to offering factual testimony, Mr. Glaser may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Ronnie Linnstaedter
RT. 4 Box 240
Caldwell, TX 77836
Phone: 409-535-4745

Mr. Linnstaedter is a current Alcoa employee. He has worked at the Rockdale facility since 1974. Mr. Linnstaedter worked in the storeroom and in the Laboratory as a Lab Technician. In addition to offering factual testimony, Mr. Linnstaedter may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Wanda Malone
1366 Fawn Lake Drive
Bryan, TX 77808
Phone: 409-778-2209

Ms. Malone is a current Alcoa employee. She has been a nurse at the Rockdale facility since 1979. In addition to offering factual testimony, Ms. Malone may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Doug Parker
P.O. Box 9
Manor, TX 78653
Phone: 512-272-4129

Mr. Parker is a current Alcoa employee. He has worked at the Rockdale facility since 1972. He has been a pipefitter and is currently Supervisor- Maintenance Division. In addition to offering factual testimony, Mr. Parker may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Eugene Schattle
1006 E. 9th Street
Cameron, TX 76520
Phone: 254-697-6107

Mr. Schattle is a current Alcoa employee. He has worked at the Rockdale facility since 1963. He has worked in pot-lining and the machine shop. In addition to offering factual testimony, Mr. Schattle may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Donald W. Schraeder
1907 O'Kelley Road
Rockdale, TX 76567
Phone: 512-446-6574

Mr. Schraeder is a current Alcoa employee. He has worked at the Rockdale facility since 1968. He has been a millwright-general mechanic and mechanical maintenance supervisor. In addition to offering factual testimony, Mr. Schraeder may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Aloma Walker
104 Sand Oak Drive
Rockdale, TX 76567
Phone: 512-446-3868

Ms. Walker is a current Alcoa employee. She started work at the Rockdale facility in 1988 and is a Public Affairs Specialist. In addition to offering factual testimony, Ms. Walker may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Cholly Weise
P.O. Box 468
Thorndale, TX 76577
Phone: 512-898-2476

Ms. Weise is a current Alcoa employee. She has worked at the Rockdale facility since 1965. She was the Benefits Administrator from 1983 until 1996. In addition to offering factual testimony, Ms. Weise may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Michael Davenport
P.O. Box 564
Thorndale, TX 76577
Phone: 512-898-2852

Mr. Davenport began his employment with Alcoa in 1968. He has worked in the potroom and became a Unit Supervisor in 1989. In addition to offering factual testimony, Mr. Davenport may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Ray Kuchera
2007 Yokley
Rockdale, TX 76567
Phone: 512-446-2627

Mr. Kuchera is a current Alcoa employee. He began work at the Rockdale facility in 1964 as a laboratory assistant. Currently, Mr. Kuchera is Production Manager/Atomizer. In addition to offering factual testimony, Mr. Kuchera may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Terry Corbin
1000 N. Harding
Cameron, TX 76520
Phone: 817-697-6105

Mr. Corbin began working at Alcoa in 1964. He was a pipefitter in the 1960s and 1970s. In 1995, Mr. Corbin was a Unit Supervisor/Electrode. In addition to offering factual testimony, Mr. Corbin may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Donald Schraeder
1907 O' Kelley RD.
Rockdale, TX 76567
Phone: 512-446-6574

Mr. Schraeder has been employed at Alcoa since 1965. He has worked as a millwright and is Unit Supervisor/Mechanical Maintenance. In addition to offering factual testimony, Mr. Schraeder may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Bill Proctor
2406 Post Oak Road
Rockdale, TX 76567
Phone: 512-446-2994

Mr. Proctor began his employment with Alcoa in 1948. He held several positions including Ingot Superintendent. In addition to offering factual testimony, Mr. Proctor may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Sterling Kaye
1705 Sager Road
Rockdale, TX 76567
Phone: 512-446-7139

Dr. Kaye is a radiologist practicing since 1985 in Rockdale. Dr. Kaye is a hospital-based radiologist who has reviewed x-rays of Alcoa employees at the Rockdale Medical Association. In addition to offering factual testimony, Dr. Kaye may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Robert Smalley
P.O. Box 825
LaGrange, TX 78945

Dr. Smalley is a radiologist. Since 1990, Dr. Smalley has reviewed the x-rays of Alcoa employees. In addition to offering factual testimony, Dr. Smalley may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jay Bruggeman
336 Raymaley Rd.
Harrison City, PA 15636
Phone: (724) 744-0821

In addition to offering factual testimony, Mr. Bruggeman may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Kevin Rolan
Route 1, Box 483
Rockdale, TX 76567
Phone: 512-446-7254

Mr. Rolan began his employment with Alcoa in 1974 and has held several positions including store material specialist, construction inspector and unit supervisor/mechanical maintenance. In addition to offering factual testimony, Mr. Rolan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Charles Hairston
Route 1, Box 488 B
Rockdale, TX 76567
Phone: 512-446-5574

Mr. Hairston was employed at Alcoa's Rockdale plant from 1963 until 1996. He held various positions during this time period including Potline Helper and Stores Materials Specialist. Mr. Hairston currently works at the Rockdale plant as an independent contractor. In addition to offering factual testimony, Mr. Hairston may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Stephen McFaul
Rt. 3, Box 39B
Cameron, TX 76520
Phone: 254-697-6028

Mr. McFaulk worked at the Alcoa Rockdale plant from 1963 until 1991. During that time, he held various positions including welder, material coordinator and unit supervisor. In addition to offering factual testimony, Mr. McFaulk may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Ray McClain
1803 Sager
Rockdale, TX 76567
Phone: 512-446-2631

Mr. McClain was employed at the Alcoa Rockdale plant from 1967 until 1995. During this time period, he occupied various positions including pipefitter, maintenance technician, maintenance foreman, and supervisor. In addition to offering factual testimony, Mr. McClain may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Howard Ryan
Route 1, Box 280
Rockdale, Texas 76567
Phone: 512-446-6363

Mr. Ryan worked at Alcoa's Rockdale plant from 1964 until 1994. During this time period, he occupied various positions including machinist and mechanical maintenance supervisor. In addition to offering factual testimony, Mr. Ryan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Mary Brown
Route 2, Box 726
Lexington, TX 78947
Phone: 512-446-3605

Mrs. Brown was employed as a secretary at the Rockdale plant from 1951 until 1985. In addition to offering factual testimony, Mrs. Brown may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Glade Lantz
1803 O'Kelley
Rockdale, Texas 76567
Phone: 512-446-6453

Mr. Lantz was employed by Alcoa in various capacities from 1951 until he retired in 1994. He served as the technical manager for the Rockdale plant from 1978 until 1994. In addition to offering factual testimony, Mr. Lantz may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Thomas Bonney
2816 Herron Lane
Glenshaw, PA 15116
Phone: 412-487-4877

Mr. Bonney is a retired Alcoa employee. Mr. Bonney began working at Alcoa in 1948 and retired in 1987. Mr. Bonney worked in the Industrial Hygiene department in Pittsburgh. Mr. Bonney is a certified Industrial Hygienist and practiced such profession while an employee of Alcoa. He will express opinions concerning what was known about asbestos related disease in the 1950's, 1960's, 1970's and 1980's. The assumptions made concerning the type of fibers that caused or did not cause disease. Furthermore, he will testify concerning the safety awards and general hygiene practices at Alcoa generally. He will express opinions concerning the implementation of the ACGIH Tlv standards and the various governmental regulations. In addition to offering factual testimony, Mr. Bonney may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Thomas Boswell
P.O. Box 1197
Rockdale, Texas 76567
Phone: 512-446-5576

Mr. Boswell is a former Alcoa employee. He worked at the Rockdale facility from 1953 until 1986. When he retired, he was Design Superintendent. In addition to offering factual testimony, Mr. Boswell may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Frank Burford
1703 Murray Street
Rockdale, Texas 76567
Phone: 512-446-5134

Mr. Burford is a retired Alcoa employee who began his employment with Alcoa in 1963. He has worked in the potline department at the Rockdale facility and also worked in such

positions as Potlining Foreman and Unit Supervisor/Potlining. In addition to offering factual testimony, Mr. Burford may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jack Clark
Route 1, Box 428
Rockdale, TX 76567
Phone: 512-446-6395

Mr. Clark is a retired Alcoa employee. Mr. Clark began his employment at the Rockdale facility in 1962 and held several positions including Electrician Helper, Craft Help, and Brick Mason. In addition to offering factual testimony, Mr. Clark may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Charles H. Ross
1419 Anderson Avenue
Maryville, TN 37803
Phone: 423-982-2997

Mr. Ross began his employment with Alcoa in 1952 as a chemist at the Rockdale facility. His title changed to Staff Chemist in approximately 1969. He retired in June of 1987. In addition to offering factual testimony, Mr. Ross may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

F. Robert Hubbard
1248 Eagle Nest Lane
Knoxville, TN 37922
Phone: 423-354-3626

Mr. Hubbard joined Alcoa in 1970. He was the plant safety manager at the Rockdale facility from May 1980 until October 1981. In addition to offering factual testimony, Mr. Hubbard may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jack Drake
P.O. Box 1208
Rockdale, TX 76567
Phone: 512-446-2933

Mr. Drake is a former Alcoa employee. Mr. Drake began his employment in 1953 and served as Alcoa Rockdale plant manager from 1977 until 1982 and Texas area manager from 1982 through 1994. In addition to offering factual testimony, Mr. Drake may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Thomas Hormuth
2001 Yockley
Rockdale, TX 76567
Phone: 512-446-5484

Mr. Hormuth is a former Alcoa employee. His employment began in 1967 and he was construction superintendent at the time of his retirement in 1997. In addition to offering factual testimony, Mr. Hormuth may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jimmie Kopriva
1400 North Burns
Cameron, TX
Phone: 817-697-3479

Mr. Kopriva is a former Alcoa employee. Mr. Kopriva began his employment in 1968 as a clerk and retired in 1995 as a buyer at the Rockdale facility. In addition to offering factual testimony, Mr. Kopriva may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jerry Kirk
1301 Rockdale Road
Rockdale, TX 76567
Phone: 512-446-2050

Mr. Kirk began his employment with Alcoa in 1963 as a draftsman in the engineering department. Mr. Kirk retired in 1991 as a mechanical engineering associate. In addition to offering factual testimony, Mr. Kirk may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Gus Klekar
Route 1
Box 489C
Rockdale, TX 76567
Phone: 512-446-3092

Mr. Klekar began his employment with Alcoa in 1966 as a production helper. He served in various positions including potlining foreman and supervisor of the potroom. Mr. Klekar retired in 1997. In addition to offering factual testimony, Mr. Klekar may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jake Kraal
1303 North Travis
Cameron, TX 76520
Phone: 254-697-2917

Mr. Kraal began work at the Alcoa Rockdale facility in 1953 as a craft helper. He also worked as a pipefitter, maintenance control technician, and mechanical maintenance unit supervisor. Mr. Kraal retired in 1988. In addition to offering factual testimony, Mr. Kraal may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jesse Love
P.O. Box 23
Milano, TX
Phone: 512-455-7915

Mr. Love began his employment at the Alcoa Rockdale facility in 1962. He held several positions including welder apprentice, welder, and general mechanic. Mr. Love retired in 1996. In addition to offering factual testimony, Mr. Love may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jay C. Morgan
301 Bounds
Rockdale, TX 76567
Phone: 512-446-3387

Mr. Morgan began to work at Alcoa's Rockdale facility in 1954. He has held several positions including potman, line foreman, and potroom control supervisor. Mr. Morgan retired in 1985. In addition to offering factual testimony, Mr. Morgan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Nelson Mueller
1302 East Barton Drive
Temple, TX
Phone:

Mr. Mueller began his employment at Alcoa's Rockdale facility in 1967 and held several positions including plant safety and health administrator and senior safety/health engineer. Mr. Mueller retired in 1996. In addition to offering factual testimony, Mr. Mueller may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Wallace Tucker
Route 2, Box 70
Rockdale, TX 76567
Phone:

Mr. Tucker began to work for Alcoa in 1953 as a machinist at the Rockdale facility. He held several positions including maintenance control technician, mechanic shop, foreman, mechanical maintenance supervisor/north plant, and division maintenance supervisor. Mr. Tucker retired in 1980. In addition to offering factual testimony, Mr. Tucker may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Thomas Washam, M.D.
P.O. Box 69
Vinton, OH 45686
Phone: 740-388-8248

Dr. Washam served as the Texas area medical director for Alcoa beginning in 1981. Dr. Washam retired in 1996. In addition to offering factual testimony, Dr. Washam may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Harold Anaspach
5100 Hillcrest
Waco, TX 76710
Phone: 254-772-2315

Dr. Anaspach began practicing as a diagnostic radiologist in 1937 or 1938. Dr. Anaspach visited Alcoa's Rockdale facility once a week for a number of years. He stopped reading films in 1976. In addition to offering factual testimony, Dr. Anaspach may offer specialized or expert testimony. It is anticipated

that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jim Archibald
13712 West Robertson Drive
Sun City West, AZ 85375
Phone: 913-345-1500

Mr. Archibald began employment with Alcoa in 1952. Mr. Archibald retired in 1991. In addition to offering factual testimony, Mr. Archibald may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Mario Caprio
101 Woodstone Drive
New Kensington, PA 15068
Phone: 412-335-6009

Mr. Caprio started at Alcoa in 1948. He spent 19 years in research in New Kensington and 19 years in purchasing. He retired in 1986. In addition to offering factual testimony, Mr. Caprio may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Bertram Dinman, M.D.
4710 Bayard Street
Pittsburgh, PA 15213
Phone: 412-687-4710

Dr. Dinman began his employment with Alcoa in 1973 and retired in 1989. Dr. Dinman held several positions, including Vice President, Health and Safety. In addition to offering factual testimony, Dr. Dinman may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

George Farrah
460 Riverview Drive
New Kensington, PA 15068
Phone: 412-337-8700

Mr. Farrah began his employment with Alcoa in 1940 and retired in approximately 1979. Mr. Farrah held several positions including Chairman of the Environmental Health Lab. In addition to offering factual testimony, Mr. Farrah may offer specialized or expert testimony. It is anticipated that his testimony may

include "expert testimony," based on his experience, background and training in the field.

Frank Doss Brown
Route 2, Box 726
Lexington, TX 78947
Phone: 512-446-3605

Mr. Brown worked at the Alcoa Rockdale plant from 1952 until he retired in 1980. He became Mechanical Maintenance Foreman in 1953 and supervised pipefitters. In addition to offering factual testimony, Mr. Brown may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Edmund W. Roberts
Route 2, Box 318
Rockdale, TX 76567
Phone: 512-446-5036

Mr. Roberts was Supervisor of Pot Lining at Alcoa Rockdale. He may testify live, or by deposition, with regard to the potential for exposure to asbestos in the Potlining or Potroom Departments at Alcoa Rockdale. In addition, he may testify regarding Alcoa's efforts to warn employees about potential hazards of exposure to asbestos, as well as Alcoa's efforts to identify substitute products for asbestos containing materials. In addition to offering factual testimony, Mr. Roberts may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

John Cummings
Corporate and Investor Relations
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Alcoa Wenatchee Works
6200 Malaga Highway
Malaga, WA 98828-9728
Phone: 509-663-9227

Records Custodian
Alcoa Warrick Operations
Highway 66
Newburgh, IN 47629
Phone: 812-853-6111

Records Custodian
Alcoa Tennessee Operations
1100 East Hunt Road
Alcoa, TN 37701
Phone: 423-977-2011

Records Custodian
Alcoa Badin Works
Highway 740
Badin, NC 28009
Phone: 704-422-3621

Records Custodian
Alcoa Rockdale Operations
Five Miles South of
Intersection on State Highway 79
and Farm to Market Road
Rockdale, TX 76567
Phone: 512-446-8423

Records Custodian
Alcoa Point Comfort Operations
State Highway 35
Point Comfort, TX 77978
Phone: 512-987-6180

Records Custodian
Alcoa Corporate Offices
201 Isabella Street
Pittsburgh, PA 15212
Phone: 553-4545

Records Custodian
Alcoa Technical Center
7th Street Road
Route 780
Alcoa Center, PA 15069
Phone: 412-339-6651

**Records Custodian
Massena Operations
Park Avenue East
Massena, NY 13662
Phone: 315-764-4011**

**Harold Reagan
2009 Sager Road
Rockdale, TX 76567
Phone: 512-446-2174**

Mr. Reagan has knowledge relevant to this case about Alcoa's manufacturing processes. In addition to offering factual testimony, Mr. Reagan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

In addition to offering factual testimony, Mr. Reagan may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Michael Scott

**Ray W. Sauer, Jr.
1520 Sequoia Drive
Pittsburgh, PA 15241-3224
Phone: 412-221-2925**

Mr. Sauer is a retired Alcoa employee who began working for Alcoa in August 1958. He was formerly employed as Manager, Product Safety and Reliability. Mr. Sauer may testify regarding Alcoa's sales of various aluminum products, including what products were sold and how they were used. In addition to offering factual testimony, Mr. Sauer may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

**Earl Colley
206 Glenbrook Lane
Port Lavaca, TX 77979-9520
Phone: (512) 552-9520**

**Kenneth Dolezal
514 Travis Street
Port Lavaca, TX 77979
Phone: (512) 552-3403**

Boyd Braniff
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Phone: (512) 987-6180

Anna Garrett
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Yoakum, TX 77995-6766
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Jerry Karl

Larry Onken
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Al Rambikur
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H. P. Armintrout
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Phone: (509) 884-6833

Laird F. Schaller, M.D.
1553 Tree Farm Drive
Plano, Texas 75093
Phone: (972) 248-4810

Norman Jones
Box 212
Ganado, TX 77962
Phone: (512) 771-2627

Dr. Robert Morgan
Environmental Health Strategies
149 Commonwealth Place
Menlo Park, CA 94205
Phone: (650) 688-1750
Facsimile: (650) 688-1799

Dr. Morgan may be offered as an expert in epidemiology and cancer epidemiology.

Dr. Morgan may testify concerning his analysis of the data on asbestos exposure and the illnesses that may result, cigarette smoking and exposure to environmental tobacco smoke and the illnesses that may result, incidence of cancer in the general population including the effects of age on the incidence of cancer, incidence of cancer among aluminum workers, and heredity as a factor in the development of cancer. Dr. Morgan may testify about the development of this knowledge historically.

Dr. Morgan may testify concerning the principles employed in determining the causes and contributing factors of individual cancers and other diseases. Dr. Morgan will apply these principles to plaintiff's (decedent's) medical conditions.

Dr. Morgan will testify concerning the science of epidemiology, the appropriate use of epidemiology in addressing causal issues, the types of studies used in epidemiology to address causal issues, biostatistical aspects of epidemiologic investigations and the criteria used to interpret epidemiological data.

Dr. Morgan will testify in depth about the epidemiologic studies addressing the causal association between cigarette smoking, second-hand exposure to cigarette smoking, the increased risk of lung cancer, and the fact that asbestos exposure, in the absence of a confirmed diagnosis of asbestosis, is not causally associated with lung cancer or an increased risk of lung cancer. Dr. Morgan may testify about the relationship between smoking, asbestos and cancer.

Dr. Morgan's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of medical records and deposition transcripts.

I.A. Feingold, M.D., F.R.C.P.(C)., FCCP
Chief, Division of Pulmonology Medicine
South Miami Hospital
6200 Southwest 73rd Street
Miami, FL 33143
Phone: 305-662-5352

Dr. Feingold is a pulmonologist and certified B-reader.

Dr. Feingold may testify, in general, concerning asbestos related diseases and the effects of asbestos exposure upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of an asbestos related disease. Dr. Feingold may also testify regarding the existence or non-existence of any asbestos related disease in plaintiff (decedent). Dr. Feingold may testify as to review and interpretation of x-ray films, and whether other diseases or conditions were present in Plaintiff. Dr. Feingold may testify on the health consequences of smoking. He may also testify on the existence of a dose response relationship between exposure to asbestos and asbestos related disease. Dr. Feingold may testify about general medical issues relating to smoking, asbestos, asbestosis, lung cancer, the lungs, and the respiratory system.

Dr. Feingold may testify about the anatomy and physiology of the lungs and other parts of the respiratory system. He may testify about plaintiff's (decedent's) medical history.

Dr. Feingold may testify about lung cancer and other cigarette related diseases. He will testify about the effects of cigarette smoking on the lungs and other parts of the respiratory system. He may discuss bronchitis, bronchiolitis, peribronchial fibrosis, emphysema, COPD, smokers pigment and the relationship, if any, between these conditions and exposure to tobacco smoke. He will testify about the causal association between cigarette smoking and lung cancer, and the effect, if any, of cessation of smoking to that association.

Dr. Feingold may testify that based on the medical and scientific literature available at the time, Alcoa could not have reasonably known that its particular use of asbestos could be injurious. Dr. Feingold may testify as to his review of the literature and the opinions and conclusions contained in that literature. Dr. Feingold may testify about the nature of asbestos exposure and when it was known that particular types of exposure could cause disease, as reflected in the medical and

scientific literature. This testimony may include a discussion of levels of exposure, fiber type, and job descriptions and categories.

Dr. Feingold's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of various documents produced by the parties in discovery, medical records, pathology specimens, x-rays, and deposition transcripts. Dr. Feingold may testify further concerning matters described in the designation of Dr. Hale.

John E. Craighead, M.D.
IBC, Inc.
Box 4081, Champlain Station
Burlington, VT 05406
Phone: 802-425-3480

Dr. Craighead is a pathologist.

Upon review of plaintiff's (decedent's) medical records and pathology materials, Dr. Craighead may testify about the plaintiff's (decedent's) medical condition and its causes. His testimony may include a discussion of asbestos and its effects on human health generally and on the plaintiff's (decedent's) condition specifically and the effect of other substances on human health generally and on the plaintiff's (decedent's) condition specifically. Dr. Craighead may testify regarding the increased risk of cancer faced by individuals who smoke cigarettes or other tobacco products and the link between smoking and cancer. Dr. Craighead may testify about the relationship between asbestos exposure and cancer and the methods by which it can be determined whether a particular cancer is related to asbestos exposure. Dr. Craighead will apply these principles to plaintiff's case. Dr. Craighead may discuss asbestosis, bronchitis, bronchiolitis, emphysema, peribronchial fibrosis, smokers pigment and COPD, their interaction and their relationship to cancer.

Dr. Craighead may testify as to the state of the art with respect to asbestos in the field of medicine and in particular the evolution of knowledge regarding the effects of asbestos exposure on human health. Dr. Craighead may discuss historical literature regarding asbestos exposure and its health consequences. Dr. Craighead may discuss the conditions and circumstances necessary to give rise to asbestos-related disease as reflected in the historical literature, including the nature of the exposure, the type of fiber or asbestos involved, the duration of exposure, the intensity of the exposure and the job category or classification involved in the exposure. Dr. Craighead may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease and other related matters including current

and historic knowledge about asbestos-related disease among aluminum workers.

Dr. Craighead may testify regarding plaintiff's (decedent's) diagnosis and symptoms and their relationship, if any, to his/her alleged exposure to asbestos and/or other substances, including cigarette smoke. Dr. Craighead may discuss the relationship between the time of plaintiff's (decedent's) alleged exposure to asbestos and its relationship to the onset of their disease. Dr. Craighead may discuss the concept of latency and its applicability to this case.

Dr. Craighead may testify about cigarette smoking and the diseases caused by cigarette smoking generally. Dr. Craighead may testify based on epidemiology studies as to the cause of plaintiff's (decedent's) alleged asbestos-related disease.

Dr. Craighead may testify that based on the medical and scientific literature available at the time, Alcoa could not have reasonably known that its particular use of asbestos could be injurious. Dr. Craighead may testify as to his review of the literature and the opinions and conclusions contained in that literature. Dr. Craighead may testify as to his experiences and developing knowledge as a doctor over the years. Dr. Craighead may testify regarding exposure levels to asbestos, at what levels asbestos may cause disease, and when this was known and reflected in the medical and scientific literature.

Dr. Craighead may also testify about the body's biological responses to exposure to asbestos, the pathogenic effects produced by various asbestos fiber types and the levels of exposure necessary for such effects, the levels and circumstances of exposure necessary to produce them and the mechanisms of asbestos induced diseases including fibrosis and carcinogenesis. He may further testify concerning asbestos deposition and elimination from the lungs and body.

Dr. Craighead may testify concerning the fiber types of asbestos generally and the asbestos-related diseases that can be potentially caused by those types and under what circumstances.

Dr. Craighead may testify concerning the various alleged exposures to asbestos encountered by plaintiff (decedent) during his/her lifetime and the relative probability of those exposures being related to the development of the alleged asbestos-related disease.

Dr. Craighead's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of the various documents produced by the parties in discovery, their pertinent medical records and pathology specimens and records introduced by plaintiff's into evidence in this case. Dr. Craighead may testify further as to matters described in the designation of Dr. Cagle.

Dr. Richard Lee
RJ Lee Group, Inc.
350 Hochberg Road
Monroeville, PA 15146
Phone: 724-325-1776

Dr. Lee is a microscopist, material scientist and physicist.

Dr. Lee may testify about methods for testing and measuring airborne concentrations of asbestos fibers, the size of respirable fibers, and potential exposure of Plaintiff. He may comment on the work of Dr. Longo and others. Dr. Lee may also testify regarding potential exposure of Plaintiff to environmental tobacco smoke.

Dr. Lee will assess plaintiff's (decedent's) exposure to asbestos. Dr. Lee may testify about any tests he has performed regarding potential to exposure to asbestos in the performance of various tasks. Dr. Lee may testify concerning experiments performed to determine release of asbestos from particular products. Dr. Lee may testify concerning the nature of such experiments and the results and determinations based upon those experiments. This witness may testify concerning the precise hazards caused by the levels of dust generated by the products in question. Dr. Lee may also testify concerning the use of such products, the handling of such products and the asbestos content of such products. He may testify concerning the specific exposure of an individual when handling or using such products or while in the vicinity of such products while being used or handled.

Dr. Lee's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of various documents produced by the parties in discovery, a review of deposition transcripts, and any inspection he has performed of plaintiff's (decedent's) place of work.

Melvin W. First
Harvard School of Public Health
Department of Environmental Health
665 Huntington Avenue
Boston, MA 02115

Dr. First is an industrial hygienist. Dr. First may give testimony regarding the level of asbestos fibers released at Defendant's facility. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies both currently and historically. He may testify as to work practices employed at Alcoa's facility over the years. He may testify regarding what was known historically about the hazards of asbestos and the appropriate response to that hazard.

Dr. First may testify concerning the prudence of Alcoa's occupational health and safety practices, the likelihood that plaintiff (decedent) was exposed during his working career at Alcoa to number of airborne asbestos fibers of hydro genic significance in excess of then current standards or recommendations and the likelihood that these alleged exposures are related to Plaintiff's (or Decedent's) alleged disease. Dr. First is of the opinion that Alcoa's mishydrogen practices were among the most advanced in their industry and that Alcoa was and is a responsible employer. Dr. First may discuss some environmental exposure measurements made over the years by Alcoa. Dr. First may discuss the mechanical air conduction exhaustion air systems in the various departments of the plant. Dr. First may discuss the hydro genics significance of visible dust particles. Dr. First may discuss the periodic physical examination and x-ray program employed by the plant. Dr. First may discuss the government and industry regulations regarding asbestos exposure and their development and modification over the years.

Dr. First's testimony will be based on his training experience, education, review of the relevant medical and scientific literature, a review of various documents produced by the parties in discovery, a review of deposition transcripts, and a site inspection of the Alcoa facility. Dr. First may testify further regarding the subjects described in the designations of Dr. Balzer, Dr. Wier and Mr. Birkner.

Drew Van Orden
R.J. Lee Group, Inc.
350 Hochberg Road
Monroeville, PA 15146
Phone: 724-325-1776

Mr. Van Orden is a mineral engineer, materials scientist/microscopist and statistician. He may testify about methods for testing and measuring airborne concentrations of asbestos fibers, the size of respirable fibers, and potential exposure of Alcoa employees to asbestos fibers. He may comment on the work of Dr. Longo. Mr. Van Orden may testify about matters referred to in the designation of Dr. Richard Lee.

Lawrence W. Birkner
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, CA 91362-1822
Phone: 805-494-8173

Mr. Birkner is an experienced certified industrial hygienist with extensive background in the prevention of adverse health effects and injuries in the workplace by evaluating the workplace for potential hazards with regard to work practices and workplace

design; measuring and evaluating various substances to assess exposure, exposure potential and health and safety risks; and controlling the occupational setting with engineering, work practice, administrative, and personal protective equipment methods. Mr. Birkner may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and in particular the evolution of knowledge regarding the effects of asbestos exposure and its control during the period relevant to this case. He may also testify as to the development and utility of methodologies identifying and measuring asbestos in air, dust and products, and the process of setting threshold limit values ("TLVS") and other levels for asbestos exposure. He may also testify regarding the evolution of various standards for exposure to asbestos, including the TLVs and OSHA-PELs.

Mr. Birkner may discuss the relationship between scientific knowledge and the development of public policy and the standards relating to asbestos exposure, and all aspects of government regulation of asbestos exposure. Mr. Birkner may discuss historic literature regarding asbestos exposure and its health consequences, and recommended methods for controlling those consequences. Mr. Birkner may discuss the conditions and circumstances necessary to give rise to asbestos-related disease, as reflected in the historic literature, including the nature of the exposure, fiber type involved, duration of exposure, intensity of exposure and job categories. He may also testify as to industrial hygiene relating to asbestos, including, but not limited to asbestos containing products used in manufacturing facilities, construction sites, and assessment of risk of exposure under various circumstances. Mr. Birkner may also testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters including knowledge about asbestos-related disease among aluminum workers.

Mr. Birkner may also testify about the development of the internal knowledge of ALCOA regarding exposure to asbestos, including but not limited to what was known and knowable regarding the health effects of exposure to asbestos, the knowledge available to the industry and the advice being given by industrial hygienists in the field, potential risks of exposure to asbestos, how to address those risks in various occupational settings, and finally the development of information regarding finished products and their application in field settings. Mr. Birkner may testify about the approaches generally and by ALCOA in particular for controlling the risks arising from exposure to asbestos and asbestos-containing products in occupational settings, including but not limited to work practices, engineering controls, warnings and labeling.

Mr. Birkner may comment about testing done by or on behalf of the plaintiff, including critique and analysis of the sampling methods and analysis, protocols and scientific basis for the

tests, and accuracy of the testing in reproducing field conditions.

Mr. Birkner is of the opinion that Alcoa's industrial hygiene practices were among the most advanced in their industry and that Alcoa was and is a responsible employer.

Mr. Birkner's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of various documents produced by the parties in discovery, a review of deposition transcripts, and a site inspection of the Alcoa facilities. Mr. Birkner may testify about matters referred to in the designations of Dr. First, Dr. Balzer and Dr. Wier.

Francis W. Weir, Ph.D.
8131 Wycomb Drive
Houston, TX 77070
Phone: 281-893-4003

Dr. Weir is an Industrial Hygienist and Toxicologist. Dr. Weir may testify regarding the state of scientific and medical knowledge concerning asbestos during the time periods relevant to this case. His testimony may include, but is not limited to, discussions regarding the respiratory system, asbestos-related diseases and the effect of other substances on the respiratory system. Dr. Weir may give testimony regarding the level of asbestos fibers released at Defendant's facility. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. 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 and OSHA guidelines as they relate to various types of occupations.

Dr. Weir will assess the potential for the plaintiff (decedent) to have received a physiologically significant exposure to asbestos fibers released from his alleged interaction with asbestos-containing materials resulting from his work activities at the Alcoa facility in question. Dr. Weir may testify concerning the appreciation, knowledge and understanding by various industries in the United States including aluminum, manufacturing industries regarding the toxicity of and the hazards to their workers from the use of the various asbestos-containing materials utilized in these industries at various times. Dr. Weir may testify concerning the use of asbestos-containing insulation within industry in the twentieth century. Dr. Weir may testify about the early appreciation and understanding of the health and safety issues pertaining to asbestos. Dr. Weir may testify about the differences between the various types of asbestos fibers including serpentine and amphiboles and the different propensity for these fiber types to

cause disease. Dr. Weir may testify concerning the relative use of the fiber types both in the United States and abroad.

Dr. Weir may discuss the relationship of the various fiber types and their relationship to asbestosis, lung cancer, mesothelioma and other alleged asbestos-related diseases and the understanding of those diseases historically and as reflected in the medical and scientific literature. Dr. Weir may discuss case reports regarding asbestos-related diseases both currently and historically and the medical and scientific significance of such reports. Dr. Weir may discuss the contemporary literature regarding aluminum workers.

Dr. Weir's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of the documents produced by the parties during discovery, including plaintiff's (decedent's) medical records, as well as any inspections of plaintiff's (decedent's) place of employment.

Dr. Weir may testify concerning matters referenced in the designations of Dr. First, Dr. Balzer and Mr. Birkner.

J. LeRoy Balzer, Ph.D
408 Horse Trail Court
Alamo, CA 94507
Phone: 925-274-0826
Fax: 925-274-1413

Dr. Balzer was a Certified Industrial Hygienist from 1973 until 1987 when he became an Assistant Vice Chancellor at the University of California Health Sciences Campus in San Francisco. Dr. Balzer may testify regarding the state of scientific and medical knowledge concerning asbestos during the time periods relevant to this case. Dr. Balzer may give testimony regarding the level of asbestos fiber released at Defendant's facility. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. 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 and OSHA guidelines as they relate to various types of occupations.

Dr. Balzer's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, and a review of the documents produced by the parties during discovery.

Dr. Balzer is of the opinion that Alcoa's industrial hygiene practices were among the most advanced in their industry and that Alcoa was and is a responsible employer. Dr. Balzer may testify further as to matters described in the designations of Dr. First, Dr. Wier and Mr. Birkner.

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MULTINATIONAL PARTNERSHIP

SÃO PAULO
IN ASSOCIATION WITH
TAVARES GUERRA, RO ADVOGADOS

March 12, 1999

Via U.S. First Class Mail

To All Counsel of Record:

Re: Cause No. 97-3798: Guadalupe Banda, et al., v. Owens Corning, et al.;
Cause No. 97-8-50930-B: Arthur Dominguez, et al., v. Owens Corning, et al.;
Cause No. 97-0207-C: Paul Hunt, et al., v. Owens Corning, et al.;
Cause No. 98-4-13362: Eugene Rehak, et al., v. Owens Corning, et al.;
Cause No. 98-J-00660C: Lupe Arsola, et al., v. Owens Corning, et al.;
Cause No. 98-03869-G: Gilberto Balli, et al., v. Owens Corning, et al.;
Cause No. 07-7-13266: Louis Medellin, et al., v. Owens Corning, et al.;
Cause No. 98-748-A: George Dolezal, et al., v. Owens Corning, et al.;
Cause No. 98-07165-M: Charles Corban, et al., v. Owens Corning, et al.; and
Cause No. 96-8-13104: Joe Ann Pustejovsky, Individually and as Personal
Representative of the Heirs and Estate of Henry Pustejovsky, Deceased v.
Reynolds Metal Company: and
Cause No. 98-4-13361-A: Bomersbach v. Owens Corning, et al.

Enclosed please find Alcoa, Inc.'s Responses to Plaintiff's Requests for
Disclosure Pursuant to Rule 194 in all of the above referenced matters. Alcoa's response to
each request refers to Attachment "A." I have included one copy of Attachment A with this
letter. If you would like additional copies of Attachment A, please contact me at the number
above and I will forward them to you.

Sincerely,


William V. Conley

WVC:lj
Enclosure

cc. Alicia J. Haff, Esq. (w/o enc.) - *Via Certified Mail*

RECEIVED TIME MAR. 29. 10:54AM

PRINT TIME MAR. 29. 11:10AM



5/1

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From: Marty Brown Howarth

Date: March 29, 2000

ID#: 3655

Page: 1 of 52

**If you have any questions regarding this transmission, please contact:
Becky Kellerman at 412-594-2363.**

To:	Fax Number	Confirming Telephone Number	Client/Matter Number
Stephanie Finch	214-520-1181	214-521-3605	02402/82205

Comments/Message:

APR. 19.00* 10189

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ALMATY

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SÃO PAULO
(ASSOCIATED OFFICE)

April 13, 2000

VIA CERTIFIED MAIL

Holly J.W. Huat
Baron & Budd
3102 Oak Lawn Avenue
The Centrum, Suite 1100
Dallas, TX 75219

Re: Guadalupe Banda, et al. v. Owens-Corning Fiberglas Corp., et al.
Cause No. 97-3798-H
In the 347th Judicial District, Nueces County, Texas
Plaintiff: Guadalupe Banda

Dear Ms. Huat:

Enclosed please find Defendant Alcoa Inc.'s Designation of Expert Witnesses and Lay Witnesses pursuant to the above captioned matter.

Very truly yours,

Marty Brown Howarth

Marty Brown Howarth

MBH/mjp

Enclosure

cc: All Counsel of Record (w/encl.)
Ronald B. Walker, Esq. (w/encl.)