

NO. S-98-5033CV-C

FAY MOORE, Individually and as
 Personal Representative of the Heirs
 and Estate of Leo Moore, Deceased,

Plaintiffs,

v.

REYNOLDS METALS COMPANY,
 et al.,

Defendants.

IN THE DISTRICT COURT

NUECES COUNTY, TEXAS

343RD JUDICIAL DISTRICT

**DEFENDANT REYNOLDS METALS COMPANY'S
 RESPONSE TO PLAINTIFF'S RULE 194 REQUEST FOR DISCLOSURE**

Defendant Reynolds Metals Company ("Reynolds"), by counsel, pursuant to Rule 194 of the Texas Rules of Civil Procedure, responds as follows to Plaintiff's Request for Disclosures:

A. The correct names of the parties to the lawsuit.

Reynolds states that its correct name is Reynolds Metals Company; it is without knowledge as to the correct names of the other parties to the lawsuit.

B. The name, address, and telephone number of any potential parties.

At this time, Reynolds is aware not aware of any "potential parties." Reynolds reserves the right to supplement its response to this request.

C. The legal theories and, in general, the factual bases of the responding party's claims.

Reynolds refers plaintiff to its Special Exceptions, Original Answer and Affirmative Defenses to Plaintiff's Original Asbestos Petition filed on March 9, 1998. At this time, Reynolds expects that its defense will be based on documentary and testimonial evidence (including lay and expert testimony) that

- Decedent Leo Moore ("Moore") was not exposed to harmful levels of asbestos as an employee of Reynolds;
- Moore's lung cancer was attributable to a cause other than exposure to asbestos, specifically including, but not limited to, his use of tobacco products;
- Reynolds' did not breach any duty of care owed to Moore;
- Reynolds was not grossly negligent; and
- Moore was contributorily negligent.

D. The amount and any method of calculating economic damages.

Plaintiff's cause of action does not give rise to a recovery of economic damages, but only punitive damages for gross negligence. At this time, plaintiff has not disclosed the amount of damages she seeks nor the method of calculating such damages. Although Reynolds generally denies that grounds exist for punitive damages, Reynolds cannot respond specifically to plaintiff's claimed damages and/or damage calculation. Reynolds therefore reserves the right to supplement its response to this Request until such time as plaintiff has provided this information.

E. The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

Investigation and discovery is ongoing in this matter, and, at this time, Reynolds does not know each and every individual who has knowledge of the relevant facts, nor does Reynolds know at this time whom it may call to testify at the trial of this matter. Reynolds therefore reserves the right to supplement its response to this Request in accordance with Rule 193 of the Texas Rules of Civil Procedure. At this time, Reynolds identifies the following individuals who may have knowledge of relevant facts and who Reynolds may call to testify at the trial of this matter:

1) Plaintiff

Mrs. Velena Fay Moore
3114 Main Street
Post Office Box 163
Ingleside, Texas 78362

2) Moore's Treating Physicians. Reynolds may call some or all of the following

individuals as trial witnesses to offer testimony, including expert testimony, about their care,

treatment and diagnosis of Moore:

Dr. C. H. Isensee
3302 South Alameda Street
Corpus Christi, Texas 78411

Dr. Phyllis J. Noss
4511 Fairway Avenue
Dallas, Texas 75219

Dr. Lorraine Stehn
1731 West Wheeler Avenue
Aransas Pass, Texas 78336

Dr. E. Brugo
506 East San Antonio Street
Victoria, Texas 77901

Dr. Kirby C. Barker, Jr.
Oncology-Hematology Associates
2601 Hospital Boulevard, Suite 112
Corpus Christi, Texas 78405
(512) 883-8553

Dr. Jerrold L. Abraham
State University of New York
750 East Adams Street
Syracuse, New York 13210

3) Coworkers. Reynolds may call Moore's coworkers as trial witnesses and reserves

the right to supplement its response to this request when it has determined the names and locations

of these witnesses.

4) Reynolds Personnel.

(a) Sherwin Alumina Plant Personnel Reynolds may call some or all of the following individuals who were employed at various times at the Sherwin Alumina Plant to testify as to their personal knowledge concerning plant operations and plant conditions; the use of asbestos-containing products in plant operations; the elimination and abatement of asbestos; Reynolds' safety procedures, both in general and as they relate to asbestos (including the use of respirators); Moore's potential for asbestos exposure; and, other matters relevant to plaintiff's claims and/or Reynolds' defenses:

X
Dr. John Frandolig ✓
RR 1, Box 358
Lake Geneva, WI 53147

Dr. Frandolig was the Sherwin Alumina Plant Medical Director from 1989-91. He may be called to testify about his knowledge regarding the Respiratory Surveillance Program at the Sherwin Alumina Plant, Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures.

Dr. Guy Racette ✓
8122 Deck Street
Corpus Christi, TX 78412

Dr. Racette was the Sherwin Alumina Plant Medical Director from 1991-93. He may be called to testify about his knowledge regarding the Respiratory Surveillance Program at the Sherwin Alumina Plant, Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures.

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Dr. Wendell Roberts ✓
620 West Johnson Avenue
Arkansas Pass, TX

Dr. Roberts is the current Sherwin Alumina Plant physician. He may be called to testify about his knowledge regarding the Respiratory Surveillance Program at the Sherwin Alumina Plant, Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

Deloris Ulke ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Ms. Ulke was the Head Nurse at Sherwin Alumina Plant Medical Department. She is familiar with the Respiratory Surveillance Program that was instituted in approximately 1975 at the Sherwin Alumina Plant. She may be called to testify about her knowledge about Reynolds' attitude toward employee health in general, as well as general information regarding the Medical Department at the Sherwin Alumina Plant. She may also be called to testify about her knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

C. Arlon Boatman ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Boatman is the Health & Safety Manager for the Sherwin Alumina Plant who may be called to testify about his knowledge of Reynolds' safety procedures and the use of asbestos-containing products at the Sherwin Alumina Plant, as well as other information. He may also be called to testify about the operation of the Sherwin Alumina Plant Medical Department, including the Respiratory Surveillance Program. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

Terry N. Roubidoux ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Roubidoux was the Safety Coordinator for the Sherwin Alumina Plant from 1992-June 1997. He is currently the Area II Business Unit Superintendent at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures and the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

A.S. "Stan" Millsap ✓
5541 Bear Lane, Ste. 236
Corpus Christi, TX 78405

Mr. Millsap was the Safety Coordinator at the Sherwin Alumina Plant. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

Darrell L. Lentz ✓
2406 West Frank Street
Apartment 114
Lufkin, Texas
(409) 632-9345

Mr. Lentz was the Safety Director at the Sherwin Alumina Plant from 1977-November 1982. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

Ernest L. Sweet ✓
114 Glenwood Drive
Liverpool, New York 13090
(315) 652-6543

Mr. Sweet was the Superintendent for Environmental Health and Safety from 1980- October 1985. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

William E. Hamblin ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Hamblin was a Senior Maintenance Engineer at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Lou Suffredini ✓
Austin, Texas

Mr. Suffredini was the Plant Manager of the Sherwin Alumina Plant. He was employed at the Sherwin Alumina Plant from the early 1950s-1977. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Timothy D. Woods ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Woods is the Plant Controller at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Frank Strickland ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Strickland is the Purchasing Manager for Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

D. T. Greeson ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Greeson is a Purchasing Agent for Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

James C. Tiffany ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Tiffany was the Plant Engineer at the Sherwin Alumina Plant from approximately 1973-76 and was a General Engineer, Maintenance Superintendent, and Senior Engineer for various periods from 1964-73 and 1985 to the present. He may be called to testify about his knowledge of the use of products that contained asbestos, the elimination of some asbestos-containing products, and asbestos abatement. He may also be called to testify about his knowledge of Reynolds' safety procedures, and use of safety equipment at the Sherwin Alumina Plant, as well as other information.

Jack C. Oates ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Oates was the Plant Engineer at the Sherwin Alumina Plant from 1980-84 and was Maintenance Engineer, Project Engineer, and Project Manager for various periods between 1967-74 and 1977-91. He is currently the Senior Engineering Supervisor at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Paul Matula ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Matula is a Designer in the Engineering Department of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Mario Rivera ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Rivera was a maintenance supervisor in Area 50 of Sherwin Alumina Plant. He is currently in the Industrial Hygiene Department of the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Charles Chapman ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Chapman was a maintenance supervisor in Area 50 of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Jeffrey Downs ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Downs is the current maintenance supervisor in Area 50 of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Gary Cedotal ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Cedotal was the maintenance supervisor for Areas IV and V of the Sherwin Alumina Plant from 1989-93. He is currently the Shift Maintenance Supervisor. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Ernest Coulter ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Coulter was the Maintenance Supervisor and General Foreman in the Maintenance Department at the Sherwin Alumina Plant from 1963-90. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Ludwig Jahn ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Jahn has been the Maintenance Supervisor in the Maintenance Department at the Sherwin Alumina Plant since 1989. Prior to this position, Mr. Jahn held numerous jobs in the Maintenance Department in the 1970s. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Hector De La Garza ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. De La Garza is in the Environmental Department of the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Adan J. Villarreal ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Villarreal is a Cost Accountant at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Lester Charles Homan ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Homan is a Senior Accountant at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Ernest Boulware ✓
215 Seco
Portland, TX 78374

Mr. Boulware is a retired carpenter, laborer and maintenance mechanic from the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Frank Hall, Jr. ✓
401 Rabbit Run Road
Arkansas Pass, TX 78336

Mr. Hall is a building and trade mechanic, employed with the Sherwin Alumina Plant since the late 1950s. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Weldon Hesselstine ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Hesselstine is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1955. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Leroy Rhoads ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Rhoads is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1969. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, the involvement of the Union in safety matters at the Sherwin Alumina Plant, as well as other information.

Howard Cave ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Cave is a member of the Maintenance Department at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Ronald Hesseltine ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Hesseltine is a supervisor, employed with the Sherwin Alumina Plant. He worked as an hourly equipment cleaner from 1965-88. He was promoted to supervisor in 1988 and worked as a supervisor in Areas IV and V from 1994-96. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Jimmie Lehman ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Lehman is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Howard Bittel ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Bittel is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1987. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Chuck Coulter ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Coulter is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Willie Enriquez ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Enriquez is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Mike Gonzales, Jr. ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Gonzales is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

A. Littlejohn ✓
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Littlejohn is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Tony Dunn
Sherwin Alumina Plant
P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Dunn was the Process Engineer at the Sherwin Alumina Plant from 1963-70 and was Technical Manager and Superintendent, and Operating Superintendent for various periods between 1974-76 and 1978-95. He is currently the Training Manager at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

(b) Reynolds Corporate Personnel. Reynolds may call some or all of the following individuals to testify regarding their personal knowledge on matters of safety, medical and industrial hygiene issues on the corporate level and/or at the Sherwin Alumina Plant specifically; plant operations and conditions; the use, elimination and/or substitution of asbestos-containing products; and, on other matters relevant to plaintiff's claims and/or Reynolds' defenses:

Dr. Woolson W. Doane
14 Runswick Drive
Richmond, Virginia 23233-5413

Dr. Doane was Reynolds' Corporate Medical Director from 1993-June 1997. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin Alumina Plant.

David Warren, M.D.
8705 Tarytown Drive
Richmond, Virginia 23229

Dr. Warren was the acting Corporate Medical Director from 1992-93. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin Alumina Plant.

E. Claiborne Irby, M.D.
11-1/2 Tapoan Road
Richmond, Virginia 23226

Dr. Irby was an Associate Corporate Medical Director from 1959-77, and Corporate Medical Director for Reynolds from 1977 until his retirement in 1992. He may be called as a factual witness, but because he also qualifies as an expert, he may offer expert, he may offer expert testimony in the fields of occupational medicine, state-of-the-art, governmental regulations, and medical issues in general as they may relate to occupational asbestos exposures.

James MacMillan, M.D.
306 Gunby Drive
Richmond, Virginia 23229

Dr. MacMillan was the Corporate Medical Director of Reynolds from 1956-77. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin Alumina Plant.

Mr. Homer Mac Cole
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230
(804) 281-3506

Mr. Cole is the Corporate Director of Industrial Hygiene and Toxicology at Reynolds. He has been an industrial hygienist at Reynolds since 1972. Mr. Cole performed industrial hygiene surveys at the Sherwin Alumina Plant and may testify regarding such surveys as well as other factual matters based on his personal experience and knowledge, including, but not limited to, plant conditions, various uses of asbestos-containing products in plant applications, the elimination and substitution of asbestos-containing products, and general issues related to industrial hygiene and safety. Although Mr. Cole will testify as a factual witness, he qualifies as an expert and may offer expert testimony in the fields of industrial hygiene, occupational health and safety, state-of-the-art, governmental regulations of workplace exposures, threshold limit values, the measurement of occupational asbestos exposures as well as other potential occupational hazards, respiratory protection, and proper work practices.

Mr. Ronald E. Benton
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Mr. Benton is Manager of Industrial Hygiene and Safety Services at Reynolds. He has been at Reynolds since 1974. He performed industrial hygiene surveys at the Sherwin Alumina Plant and may testify regarding such surveys as well as other factual matters based on his personal experience and knowledge. Mr. Benton may testify as a factual witness, but because he qualifies as an expert, he may offer expert testimony in the fields of industrial hygiene, occupational and environmental health and safety, state-of-the-art, governmental regulations of workplace exposures, threshold limit values, the measurement of occupational asbestos exposures as well as other potential occupational hazards, respiratory protection, and proper work practices.

Ms. Linda Maillet
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Ms. Maillet was the Regional Industrial Hygienist at the Corporate Headquarters of Reynolds for the Eastern Region. She is currently the Principal Health, Safety and Regulatory Affairs Scientist at the Corporate Headquarters.

Ms. Laurie Shelby
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Ms. Shelby was the Manager of Industrial Hygiene Programs at the Corporate Headquarters of Reynolds. She is currently the Manager of Health and Safety Programs.

Mr. Richard Mansur
1416 Coronet Drive
Richmond, Virginia 23229-4806
(804) 282-4438

Mr. Mansur was the Manager of the Industrial Hygiene Department at the Corporate Headquarters of Reynolds from 1969-75.

Mr. James D. Davidson

Mr. Davidson was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1976-82.

Ms. Stacey Hansen
12701 Mirror Pond Way
Midlothian, Virginia 23113
(804) 794-1736

Ms. Hansen was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1990-93.

Mr. Dale Prokopchak
2704 Empress Court
Richmond, Virginia 23233
(804) 360-3301

Mr. Prokopchak was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1988-89.

Ms. Deborah R. Hudgins

Ms. Hudgins was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1984-88.

Mr. Harry L. Skalsky
6910 West Grace Street
Richmond, Virginia 23261

Mr. Skalsky was a Medical Corporate Toxicologist at the Corporate Headquarters of Reynolds 1979-85.

Ms. Karen Kestle
1336 Merrymeade Avenue
Glen Allen, Virginia 23060
(806) 264-1789

Ms. Kestle was the Senior Insurance Administrator at the Corporate Headquarters of Reynolds

Mr. Bobby J. Sasser

Mr. Sasser was the Corporate Safety Director for Reynolds from 1973-95.

Mr. Joseph Nichols
2300 Cedarfield Parkway
Apartment 161
Richmond, Virginia 23233
(804) 282-8245

(c) Other Reynolds' Witnesses

Service Environmental Co.
P.O. Box 2355
Beaumont, TX 77704

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Service Environmental Co. may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Industrial Specialist Inc.
P.O. Box 1630
Lake Jackson, TX 77569

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Industrial Specialist Inc. may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Estes Refractory & Insulation
6300 Highway 70 N.
P.O. Box 600
Belle Rose, LA 70544

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Estes may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

TGI Stephens
777 N. Eldridge, Suite 315
Houston, TX 77079

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of TGI Stephens may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Thermo Tech Inc.
P.O. Box 3109
Orange, TX 77631

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Thermo Tech may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Gilman Insulation Co.
P.O. Box 4074
Corpus Christi, TX 78469

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Gilman Insulation may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Falcon Associates
P.O. Box 7777
Philadelphia, PA 19175

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Falcon Associates may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Brand Remediation Services, Inc.
1914 Austin Street
Orange, TX 77630

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Brand Remediation may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Northwinds Abatement, Inc.
903 Port Houston Street
Houston, TX 77029

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Northwinds Abatement may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Casanova Industrial Insulation
P.O. Box 4761
Corpus Christi, TX 78408

Performed insulation and/or asbestos abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Cassanova Industrial may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Northwest Envirocon, Inc.
16811 El Camino Real
Suite 119
Houston, TX 77058

Performed asbestos audits and abatement work at the Sherwin Alumina Plant. Accordingly, certain agents or employees of Northwest Envirocon may be called to testify concerning Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

Alex Baca
Baca Safety Consulting
6214 Battery Lane
San Antonio, Texas 78233
(210) 657-0705

Mr. Baca is a retired inspector for the United States Department of Labor Mine Safety Health Administration. He was a Federal Mine Safety and Health Inspector from 197 until January, 1998 with duties to enforce the Safety and Health Regulations on Mining Operations and to gain compliance with such regulations. Pursuant to this position, Mr. Baca inspected the Sherwin Alumina Plant. Mr. Baca may testify regarding such inspections as well as to other factual matters based on his personal experience and knowledge.

Robert E. Ruckstuhl
Proactive Safety Consultants Company, Inc.
Post Office box 260955
Corpus Christi, Texas 78426-0955
(512) 767-1663

Mr. Ruckstuhl is a consultant who specializes in the area of asbestos safety and training. He has performed consulting functions and training seminars related to asbestos safety and asbestos abatement issues at the Sherwin Alumina Plant and may testify regarding such consulting services and training seminars as well as other factual matters based on his personal experience and knowledge.

6) **Records Custodians.** Reynolds may call the individuals, live or by deposition or affidavit, to authenticate relevant records.

7) **Other Parties' Witnesses.** Reynolds reserves the right to call and/or elicit testimony from any individual identified by Plaintiff and any other party to this lawsuit and, accordingly, will supplement its response to this request when those individuals have been identified.

8) **Rebuttal/Impeachment Witnesses.** Reynolds reserves the right to call rebuttal and/or impeachment witnesses and will supplement its response to this request if and when it has sufficient information to determine the need for such testimony.

F. For any testifying expert:

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

Reynolds reserves the right to supplement its response to this Request until 60 days before the end of discovery in this matter.

G. Any discoverable indemnity and insuring agreements.

Reynolds has insurance coverage sufficient to cover plaintiff's claims with the following insurance companies:

- Travelers Insurance (9/30/53 through 9/30/66); and
- Liberty Mutual Group (9/30/66 through 9/30/78).

H. Any discoverable settlement agreements.

None.

I. Any discoverable witness statements.

None.

- J. 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.

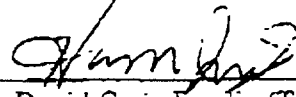
See Reynolds' Response to Request K.

- K. All medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

Subject to plaintiff's agreement to pay Reynolds one-half of its cost in retrieving these records, Reynolds will produce these records at \$ 10 per copy or will make them available to plaintiff's counsel for inspection and copying at a mutually convenient time and place.

REYNOLDS METALS COMPANY

By: _____


David Craig Landin (Texas Bar No. 11863720)

John D. Epps (Texas Bar. No. 00796079)

Harry M. Johnson, III (Texas Bar No. 00797740)

HUNTON & WILLIAMS

951 East Byrd Street

Riverfront Plaza, East Tower

Richmond, Virginia 23219

(804) 788-8200

(804) 788-8218 (facsimile)

R. Clay Hoblit (Texas Bar No. 09743100)

CHAVES, GONZALES & HOBLIT, L.L.P.

2000 Frost Bank Plaza

802 North Carancahua

Corpus Christi, Texas 78470

(512) 888-9392

(512) 888-9187 (facsimile)

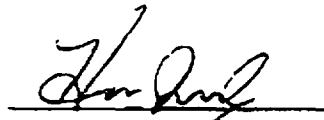
Attorneys for Reynolds Metals Company

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 1999, a true and correct copy of the above and foregoing instrument is being served by UPS Overnight Mail, on the following Plaintiff's counsel.

Russell W. Budd, Esq.
Alicia J. Haff, Esq
BARON & BUDD, P.C.
The Centrum
Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

A copy is also being served on all other known counsel of record by regular United States mail.

A handwritten signature in cursive script, appearing to read "Russell W. Budd", is written over a horizontal line.



RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200
FAX 804 • 788 • 8218

JENNIFER L. BORUM
DIRECT DIAL 804 • 788 • 8528
EMAIL: jborum@hunton.com

May 14, 2001

FILE NO: 50684.33

VIA FACSIMILE

Stephanie A. Finch, Esq.
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

Fay Moore v. Reynolds Metals Company, et al.
No. S-98-5033CV-C

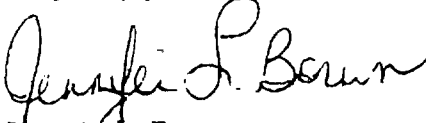
Dear Stephanie:

I am in receipt of your letter of today in which you request that I send you another copy of Reynolds' responses to Plaintiff's Requests for Disclosure. As I informed you on May 9 (the date of your inquiry), and as a courtesy to you, I mailed to you on May 9 via U.S. mail a duplicate copy of the responses which we originally provided to you on March 4, 1999.

While it is reasonable to assume that the package I mailed to you on Wednesday, May 9 is likely to arrive on your desk either today (Monday) or tomorrow, I am providing this document for a third time, via fax, along with my letter of May 9.

As always, if you have any questions, feel free to call me at (804) 788-8528.

Very truly yours,



Jennifer L. Borum

Encl.

HUNTON &
WILLIAMS

WORKING COPY

RIVERFRONT PLAZA, EAST TOWER
931 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804-788-8200
FAX 804-788-8218

JENNIFER L. BORUM
DIRECT DIAL 804-788-8523
EMAIL: jborum@hunton.com

May 9, 2001

FILE NO: 50684.00

VIA REGULAR MAIL

Stephanie A. Finch, Esq.
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

Re: --

al.

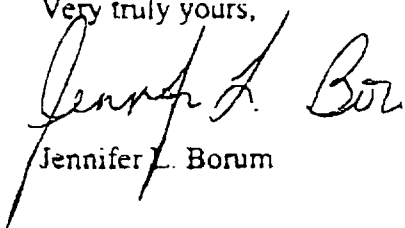
Dear Ms. Finch:

I am in receipt of y
to Plaintiff's Requests for
Reynolds provided to you

Reynolds' responses
message today,

Enclosed please fin

Very truly yours,


Jennifer L. Borum

Encl.

FILED

HUNTON & WILLIAMS

RIVERSFRONT PLAZA, EAST TOWER

801 EAST BYRD STREET

RICHMOND VIRGINIA 23219-4074

TELEPHONE (804) 783-8200

FACSIMILE (804) 783-8213

ATLANTA GEORGIA
BANGOR MAINE
BRUSSELS BELGIUM
CHARLOTTE NORTH CAROLINA
HONG KONG CHINA
MEMPHIS TENNESSEE

NEW YORK NEW YORK
NORFOLK VIRGINIA
RALEIGH NORTH CAROLINA
WARSAW POLAND
WASHINGTON DC

MARY LOU ROBERTSON
E-MAIL MLROBERTSON@HUNTON.COM

FILE NO. 5068433
DIRECT DIAL (804) 733-8

March 4, 1999

Via UPS Overnight Mail

Alicia J. Haff, Esquire
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

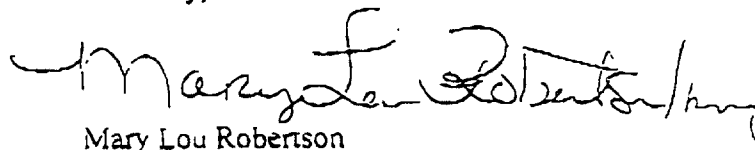
Re: *Fay Moore v. Owens-Corning Fiberglas Corp., et al.*
343rd Judicial District Court of Nueces County; No. S-98-5033CV-C

Dear Alicia

Enclosed please find *Defendant Reynolds Metals Company's Responses To Plaintiff's Request For Rule 194 Request For Disclosure.*

By copy of this letter, we are giving notice to all counsel of record. Copies of this pleading are available upon request by contacting my office at the telephone number listed above.

Sincerely,



Mary Lou Robertson

Enclosure

cc: All Known Counsel of Record (via regular mail) (w/o encl)