

NO. 00-2696-F

ELMER L. SEWELL, et al.,	§	**IN THE DISTRICT COURT**
	§	
Plaintiffs,	§	
	§	
v.	§	**NUECES COUNTY, TEXAS**
	§	
GAF CORPORATION (successor to RUBEROID CORPORATION), et al.,	§	
	§	
Defendants.	§	**214th JUDICIAL DISTRICT**

DEFENDANT REYNOLDS METALS COMPANY'S RESPONSES TO PLAINTIFFS' RULE 194 REQUESTS 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 Marroquin's ("Marroquin") Requests for Disclosure:

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 not aware of any "potential parties." Reynolds reserves the right to supplement its response to this request pursuant to Texas Rule of Civil Procedure 193.

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

Subject to the foregoing statement, Reynolds refers plaintiffs to its Special Exceptions, Original Answer and Affirmative Defenses to Plaintiffs' Original Asbestos Petition, Motion to Transfer Venue

and Motion to Drop or Sever filed on June 16, 2000. At this time, Reynolds expects that its defense will be based on documentary and testimonial evidence (including lay and expert testimony) that:

- Plaintiff Marroquin was not exposed to harmful levels of asbestos as an independent contractor at Reynolds' Sherwin and San Patricio Plants;
- Plaintiff has no asbestos-related illness or injury
- Reynolds did not breach any duty of care owed to Plaintiff;
- Reynolds was not negligent;
- Plaintiff voluntarily and knowingly assumed the risk of incurring the injuries or damages alleged; and
- Plaintiff was contributorily negligent.

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

At this time, Plaintiff has not disclosed the amount of damages sought nor the method of calculating such damages. Although Reynolds generally denies that grounds exist for 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**

Geronimo Marroquin
709 Iowa Street
Robstown, Texas 78380

2) **Any and all Family Members of the Plaintiff**

3) **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 Plaintiffs :

Dr. Peter A. Petroff

4) **Coworkers**. To date, Plaintiff identified the following nine coworkers, who Reynolds may call to testify at trial.

Ricardo Marroquin

Jose Huerta

Emilio Maldonado

Margarito Tijerina

Francisco Martinez

Cristova Huerta

Domingo Huerta

Juan Cadena

Ramiro Marroquin

Reynolds reserves the right to supplement its response to this request if and when it determines the names and locations of additional witnesses.

5) **Reynolds Personnel/Witnesses**

(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); and, other matters relevant to plaintiff's claims and/or Reynolds' defenses:

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 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 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. 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 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 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.

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

Mr. Grote has been Project Engineer and Maintenance Engineer for various periods of time between 1970 and the present. 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.

Ed Peterson
Sherwin Alumina Plant

P.O. Box 9911
Highway 361
Gregory, TX 78469

Mr. Peterson has been in the Engineering Department at Reynolds' Sherwin Plant since 1973. 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.

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

Mr. Hesseltine 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) **San Patricio Reduction Plant Personnel.** Reynolds may call some or all of the following individuals who were employed at various times at the San Patricio Reduction 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); and, other matters relevant to plaintiff's claims and/or Reynolds' defenses:

Robert Dale Gamble, M.D.
5301 St. Andrew
Corpus Christi, Texas 78413
(512) 991-2985

Dr. Gamble was the San Patricio Reduction Plant and/or Sherwin Alumina Plant Medical Director from 1975-85. He has knowledge regarding the Respiratory Surveillance Program at the San Patricio Reduction Plant. He also may have knowledge of Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may have knowledge related to asbestos exposure procedures.

Harry R. Bratt, M.D.
2040 Birch Ave.
Saint Helena, CA 94574

Dr. Bratt was the San Patricio Reduction Plant and/or Sherwin Alumina Plant Medical Director from 1971-75. He has knowledge regarding the Respiratory Surveillance Program at the San Patricio Reduction Plant. He also may have knowledge of Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may have knowledge related to asbestos exposure procedures.

Mr. E. W. Dressen
221 Blanco
Portland, Texas 78374
(512) 643-2104

Mr. Dressen was the an Engineer and Reduction Superintendent at the San Patricio Reduction Plant. He also was the acting plant manager of the San Patricio Reduction Plant from 1974-79 and from 1981 until the plant closed. He may have knowledge regarding plant

operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; and Reynolds' attitude toward safety and employee health in general.

Kenneth E. Murphree
458 Caroline Acres Point
Hot Springs, Arkansas 71913
(501) 525-3726

Mr. Murphee was the plant manager of the San Patricio Reduction Plant from 1979-81. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

William E. Campbell
7746 East Laguna Azul
Apartment #272
Mesa, Arizona 85208
(602) 357-9978

Mr. Campbell was the plant manager of the San Patricio Reduction Plant from 1972-77. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

Mr. Harry V. Helton
509 Kilmarnock Drive
Richmond, Virginia 23229
(804) 740-7705

Mr. Helton was employed at the San Patricio Reduction Plant from 1966-72 and held positions as potroom supervisor, general plant supervisor and, from 1971-72, plant manager. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

Mr. Clyde Doyce Hester
546 Evergreen Drive
Corpus Christi, Texas 78412

Mr. Hester was the chief chemist at the San Patricio Reduction Plant from 1953-89. He may have general knowledge about the plant processes, environmental issues (including asbestos abatement issues) and other information.

Mr. Allen G. Hill
418 Fetick Avenue
Taft, Texas 78390-2808
(512) 528-2749

Mr. Hill was a chemist at the San Patricio Reduction Plant from 1967-85. He may have general knowledge about the plant processes, environmental issues (including asbestos abatement issues) and other information.

Mr. William D. Pipes
P.O. Box 148
Crozier, Virginia 23039
(804) 784-1250

Mr. Pipes held the following titles at the San Patricio Reduction Plant from 1966-77: process engineer, power plant supervisor; and maintenance superintendent. He also was the plant engineer from 1979-82. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Kenneth W. Younger
12604 Hardings Trace Court
Richmond, Virginia 23233
(804) 281-4111

Mr. Younger was a project engineer at the San Patricio Reduction Plant from 1970-77 and 1980-85. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Brice G. Nelson
1045 Wilshire
Corpus Christi, Texas 78411
(512) 852-4535

Mr. Nelson was involved in the original construction and operation of the carbon plant at the San Patricio Reduction Plant, and he worked at the San Patricio Reduction Plant from approximately 1951-69, and from 1974-76. He may have knowledge regarding the construction and processes of the San Patricio Reduction Plant in general, the availability and use of personal protective equipment, general health and safety issues and applications of asbestos products in the plant.

Mr. Raymond L. Bennett
414 Reynolds Avenue
Taft, Texas 78390
(512) 528-3284

Mr. Bennett was the power plant supervisor at the San Patricio Reduction Plant from approximately 1953-84. He may have knowledge regarding plant operations in general and the operation of the power plant in particular. He also may have knowledge regarding applications of asbestos products in the power plant.

Mr. John L. Massey
P.O. Box 73
Bayside, Texas 78340
(512) 529-6692

Mr. Massey was a foreman in the San Patricio Reduction Plant maintenance department from approximately 1952-88. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment, general health and safety issues and other relevant information.

Mr. James C. Black
224 Bafanridge Drive
Hot Springs, AR 71901
(501) 624-7244

Mr. Black was employed at the San Patricio Reduction Plant as a potroom foreman from 1960-63. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

Mr. Clyde A. Krueger
131 Granby
Portland, Texas 78374
(512) 643-2421

Mr. Krueger was a general foreman at the San Patricio Reduction Plant from 1952-84. He may have general knowledge about the plant processes, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues.

Mr. William E. Shepp
244 Ross Road
Kelso, Washington 98626
(360) 578-2429

Mr. Shepp was a potroom engineer and casthouse supervisor at the San Patricio Reduction Plant. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Harold L. Bern, Jr.
2341 East Lynnwood Drive
Longview, Washington 98632
(206) 425-8082

Mr. Bern was the Personnel Manager at the San Patricio Reduction Plant from 1979-82 and may have knowledge about information relevant to this lawsuit.

Mr. Joel W. Whitlock
6837 SE Cottrell Road
Gresham Oregon 97080-8911
(503) 663-2096

Mr. Whitlock was employed at the San Patricio Reduction Plant from 1958-71 and, during that time, held the following titles and positions: potroom general clerk; potroom foreman; anode foreman; pot relining supervisor; maintenance supervisor and plant safety engineer. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

Mr. Jack H. Norris, Jr.
4318 St. George
Corpus Christi, Texas 78413
(512) 853-1021

Mr. Norris was a purchasing agent at the San Patricio Reduction Plant from 1976-86 and plant purchasing manager from 1986-88. He may have knowledge about the purchase, use and application of asbestos-containing products and/or substitutes for asbestos-containing products, the purchase and use of safety equipment (including respirators), asbestos abatement and other relevant information.

Richard C. Easterline
15 Serra Lane
Massena, New York 13662
(315) 769-1996

Mr. Easterline was employed at the San Patricio Reduction Plant from 1968-82 and held positions as an engineer and carbon services supervisor. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

John W. Ford
c/o Reynolds International
P.O. Box 27002
Richmond, Virginia 23261
(503) 666-0203

Mr. Ford was the plant maintenance supervisor at the San Patricio Reduction Plant from 1979-83. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

(c) **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 San Patricio Reduction 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:

Woolson W. Doane, M.D.
14 W. Runsick Drive
Richmond, Virginia

Dr. Doane was Reynolds' Corporate Medical Director from 1993-97. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin and San Patricio plants.

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.

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.

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 San Patricio Reduction 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
(804) 281-2000

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 San Patricio Reduction 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

Mr. Nichols was the Corporate Safety Director for Reynolds from 1945-73.

6) **Records Custodians.** Reynolds may call, live or by deposition or affidavit, various records custodians to authenticate relevant records, including, but not limited to, the records of Plaintiffs' medical care providers and the records of their employers.

7) **Other Parties' Witnesses.** Reynolds reserves the right to call and/or elicit testimony from any individual identified by plaintiffs 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.

Pursuant to Rule 195 of the Texas Rules of Civil Procedure, Reynolds refers plaintiffs to its designation of Expert Witnesses that will be filed in accordance with the scheduling order of this court and the Texas Rules of Civil Procedure.

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)
- 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 plaintiffs' agreement to pay Reynolds one-half of its cost in retrieving these records, Reynolds will produce these records at $.15 per page or will make them available to plaintiff's counsel for inspection and copying at a mutually convenient time and place.

REYNOLDS METALS COMPANY

By: _____

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Attorneys for Reynolds Metals Company

CERTIFICATE OF SERVICE

I hereby certify that on the 23RD day of May, 2001, a true and correct copy of the above and foregoing instrument is being served by ~~certified mail, return receipt requested~~ U.P.S. overnight Delivery, on the following Plaintiffs' counsel:

Stephanie Finch
BARON & BUDD, P.C.
The Centrum
Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

All other known counsel of record are given notice of this pleading by regular United States mail only.

