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E. FACT WITNESS DISCLOSURE RELATING TO PUNITIVE DAMAGES CASE AGAINST ASBESTOS CORPORATION, LTD.

Witnesses with Knowledge of Asbestos Corporation, Ltd.'s Worldwide Sales and Marketing Activities.

1. Jean Dupéré, the majority owner of LAB Chrysotile, Inc., concerning his remarks published in an article in the Toronto Star on March 21, 1999, regarding the sale of Canadian asbestos to third world countries, and the likelihood that "Canadian asbestos...will kill foreign workers in Algeria, a developing country."

2. Dr. Julian Peto, Department of Epidemiology, University of London, Institute of Cancer Research, concerning his remarks published in articles in the Toronto Star on March 20, 1999 and March 21, 1999, regarding the unsafe use of asbestos by workers in the construction industry in third world countries, which will likely result in an epidemic of asbestos-related cancers in the developing world.

3. Michael J. Messel, 49 Cherrywood Drive, Nepean, Ontario, Canada, live or by deposition transcript taken on January 15, 1987 in Clayton Brass, et al vs. Asbestos Corporation Limited, et al, Province of Quebec, District of Montreal, Superior Court Case No. 500-05-011589-867, concerning knowledge gained by attendance at a conference in Antigua in the mid-1960's concerning the relationship between asbestos exposure and lung cancer, and between asbestos exposure and mesothelioma.

4. Michel Camus, Ph.D., regarding findings published in the New England Journal of Medicine, May 28, 1998.

5. Jack Siemiatycki, Ph.D., regarding findings published in the New England Journal of Medicine, May 28, 1998.

6. Bette Meck, M.Sc., regarding findings published in the New England Journal of Medicine, May 28, 1998.

7. Dr. Philip Landrigan, New York, Mt. Sinai School of Medicine, concerning his remarks published in an article in the Toronto Star on March 20, 1999, regarding his belief that studies being done in Quebec regarding the effect of asbestos exposure are being misinterpreted, and that rates of pleural cancer in Quebec are "in fact 763 percent higher" than normal.

8. Dr. Barry Castleman, Ph.D., 2412 Pickwick Road, Baltimore, Maryland 21207, concerning his remarks published in an article in the Toronto Star on March 20, 1999, regarding his belief that the consequences for poor and developing nations using Canadian asbestos could be deadly.

9. Dr. William Nicholson, Mt. Sinai School of Medicine

10. Harsh Jaitli, Director, Occupational and Environmental Health Clinic, New Delhi, India.

11. Gordon McVie, Director, Cancer Research Campaign, United Kingdom, concerning his remarks published in an article in the Toronto Star on March 20, 1999, warning that the CRC's study into the European epidemic of asbestos exposure should "sound alarm bells everywhere," especially in the developing world where uncontrolled asbestos use is still very common.

12. Dr. Joseph LeDou, University of California Medical School, Editor International Journal of Occupational and Environmental Health, concerning his remarks published in an article in the Toronto Star on March 20, 1999, condemning Canada's promotion of asbestos use in the developing world, and its "exploitation of ignorance and poverty" in Asia, Africa and Latin America.

13. Michael Gratton, former Director, Asbestos Institute, concerning his remarks published in an article in the Toronto Star on March 20, 1999, regarding his belief that the Asbestos Institute cannot ensure Canadian asbestos is being safely handled abroad, and that the industry was more interested in "the almighty dollar."