PLAINTIFF'S EXHIBIT

ARCO-63

CAUSE NO. -1-00802-L

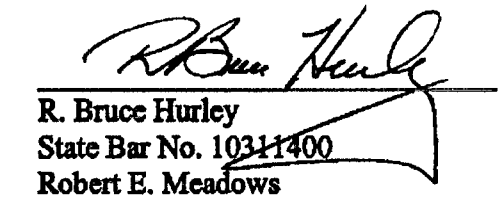
WILBERT LEE DARK	§	IN THE DISTRICT COURT OF
	§	
VS.	§	DALLAS COUNTY, TEXAS
	§	
U.S. GYPSUM COMPANY, et al.	§	L-193rd JUDICIAL DISTRICT

DEFENDANT ATLANTIC RICHFIELD COMPANY'S
FIRST SET OF INTERROGATORIES TO PLAINTIFFS

TO: All Plaintiffs asserting claims against Atlantic Richfield Company (Individually and as Successor-in-Interest to Sinclair Oil Corporation) by and through their attorneys of record, D. Leanne Jackson, Baron & Budd, P.C., The Centrum, Suite 1100, 3102 Oak Lawn Avenue, Dallas, Texas 75219.

Pursuant to Rule 197 of the Texas Rules of Civil Procedure, you are directed to answer the following Interrogatories in accordance with the applicable Texas Rules of Civil Procedure. The interrogatories are directed to the Plaintiffs, individually, and each and every Plaintiff must answer the interrogatories, separately and fully, in writing and under oath. A true copy of the answers must be served on the undersigned attorneys on or before thirty days after service hereof.

Respectfully submitted,



R. Bruce Hurley
State Bar No. 10311400
Robert E. Meadows
State Bar No. 13885700
KING & SPALDING
1100 Louisiana, Suite 3300
Houston, Texas 77002-5219
713/751-3200 - Fax: 713/751-3290

HAWKINS & PARNELL, L.L.P.
Albert H. Parnell
State Bar No. 00789876
4000 Suntrust Plaza
303 Peachtree Street, NE
Atlanta, Georgia 30308-3243

Attorneys for Defendant Atlantic Richfield Company (Individually and as Successor-in-Interest to Sinclair Oil Corporation)

CERTIFICATE OF SERVICE

I certify that on this on this 22nd day of March, 2001, a true and correct copy of the foregoing has been served via facsimile and/or U.S. mail and/or certified mail, return receipt requested, to:

Certified Mail, RRR
D. Leanne Jackson
Baron &Budd, P.C.
The Centrum
Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219



R. Bruce Hurley

DEFINITIONS

1. "You" and "your" mean a Plaintiff claiming an asbestos-related personal injury or disease. In cases involving death allegedly caused by an asbestos-related injury or disease, "you" and "your" mean the decedent. In cases involving household or secondary exposure, "you" and "your" include the person who allegedly brought asbestos into your household or otherwise into contact with you.

2. "Premises Defendant" means a Defendant being sued, in whole or in part, on a premises-liability theory.

3. "Document(s)" means any printed, typewritten, handwritten, or other tangible things, including but not limited to: letters, memoranda, notes, forms, reports, charts, telegrams, brochures, calendars, books, newspapers, magazines, newsletters, publications of any kind, diaries, files, statements, invoices, shipping documents, medical records, business records, affidavits, declarations, witness statements, announcements, photographs, drawings, blueprints, plans, specifications, bids, audio recordings, video recordings, and all other forms of tangible information or tangible things.

4. "Premises" means

   (a) real property, as well as any structures or other improvements located on the property, or

   (b) a ship or other floating vehicle, vessel, or structure.

5. When an "address" is requested, it means the person's or entity's current or last-known business or residence address, and is to be stated as precisely as possible.

6. A "person with knowledge of relevant facts" has the same meaning as in Rule 192.3(c) of the Texas Rules of Civil Procedure.

7. "Medical Practitioner" means any medical doctor, physician, surgeon, doctor of osteopathy, chiropractor, psychologist, mental health counselor, or other person practicing any healing arts or sciences, as well as their employees and staff.

8. ARCO means Atlantic Richfield Company and any affiliated or related company(ies) and/or any predecessor whose alleged conduct forms the basis of Plaintiff(s)' claims against ARCO.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify all ARCO plants or facilities that you worked in where you allege you were exposed to asbestos, asbestos dust, or asbestos containing products, and for each state:

(a) the name and address of each plant or facility;
(b) the specific dates you worked at each plant or facility identified above;
(c) your employer(s) while you worked at each plant or facility identified above;
(d) your trade or occupation while working at each plant or facility identified above, and the nature of the activities in which you were engaged during your employment there;
(e) the location(s) or unit(s) where you worked at each plant or facility identified above;
(f) the name of your immediate supervisor(s) whole working at each plant or facility identified above; and
(g) the reason for your termination of employment at each plant or facility identified above.

ANSWER:

INTERROGATORY NO. 2:

State in detail your smoking history and/or the history of your use of all tobacco products, to include stating when you started smoking or otherwise using tobacco products and when you stopped, if applicable; the amount of tobacco products you smoked or otherwise used on a daily basis; and the brand of the tobacco products you smoked or otherwise used.

ANSWER:

INTERROGATORY NO. 3:

State the names and addresses of all doctors, psychiatrists, psychologists, counselors, hospitals, clinics, or other health care providers which have treated or examined you or to which you have gone from your 15th birthday until the present.

ANSWER:

INTERROGATORY NO. 4:

Please provide the following information with respect to each employer for whom you ever worked:

(a) the name and address of the employer, and the name and address of each job site or work site at which you worked for that employer;

(b) the beginning and ending dates of your employment;

(c) the names and addresses of your immediate supervisors and your co-workers;

(d) your wage or salary rate, normal hours worked, and average weekly earnings;

(e) your job duties or responsibilities;

(f) your job title(s) or classification(s);

(g) why your employment ended;

(h) whether you contend that you were exposed to asbestos during the employment; and

(i) identify each asbestos product to which you were exposed including identity of the manufacturer's trade name, and identify each supplier, manufacturing contractor, and/or installer, and description of the particular product in each employment, and state in detail when, where and how you or the decedent were exposed to each product.

ANSWER:

INTERROGATORY NO. 5:

If you contend that venue of your claims is proper in Dallas County because you contend that you were exposed to asbestos in Dallas County, please state:

(a) the name, address, and the name and address of the owner or occupier, of each location in Dallas County at which you contend you were exposed to asbestos;

(b) the beginning and ending dates during which you contend you were exposed to asbestos at each location identified in response to (a).

ANSWER:

INTERROGATORY NO. 6:

If you contend that venue of your claims is proper in Dallas County because you contend that you were exposed to asbestos at the premises of a defendant who you contend has a principal office in Texas in Dallas County, please state:

(a) the name of each defendant who you contend has a principal office in Texas in Dallas County;

(b) all facts supporting your contention that such defendant has a principal office in Texas in Dallas County;

(c) for each defendant named in (a), state the name and location of each premises of that defendant where you contend you were exposed to asbestos, and state the beginning and ending dates of your exposure to asbestos at each premises.

ANSWER:

INTERROGATORY NO. 7:

If you have made application for settlement with the Johns Manville Personal Injury Settlement Trust or any other trust, trustee, bankrupt party, debtor in possession, or other person or entity regarding your alleged asbestos related disease, answer the following:

(a) the name of the person, trust, or other entity to whom you made application;

(b) the date you made application;

(c) describe all claims that you made in such application;

(d) describe and identify the gross amount of any settlement received or approved;

(e) describe any response from the person, trust, or other entity including any medical evaluation done by the person, trust, or other entity concerning your claim.

ANSWER: