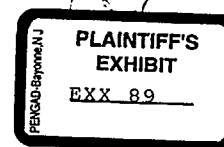


18TH JUDICIAL DISTRICT COURT
PARISH OF IBERVILLE
STATE OF LOUISIANA



JOSEPH A. CLEBERT and
GLORIA GOMEZ CLEBERT

SUIT NO.: 38,744

VERSUS

DIVISION "B"

MCCARTY CORPORATION, ET AL

EXXON'S RESPONSE TO PLAINTIFFS' REQUEST FOR ADMISSIONS

Exxon Corporation ("Exxon") hereby responds to the requests for admission propounded by plaintiffs and received by Exxon on February 19, 1991, as follows:

REQUEST FOR ADMISSION NO. 1

Admit that during the period October 25, 1951 through February, 1975, Fred S. Venable was in the employ of Exxon Company, USA and/or its predecessors as an industrial hygienist.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

Admitted.

REQUEST FOR ADMISSION NO. 2

Admit that the following memorandum, copies of which are attached for identification, reports and/or records were maintained in the course of Fred S. Venable's business activities. Please answer separately as to each.

(a) Letter dated October 25, 1951 from Fred S. Venable to E.E. Moore.

(b) Memorandum dated November 2, 1951 from Fred S. Venable to Dr. Howard Hansen.

(c) Memorandum dated December 4, 1951 from Fred S. Venable to Dr. E.R. Hawkins.

(d) Undated memo from Fred S. Venable to Dr. K.S. Jones, subject asbestos exposure of air samples collected on October 9, 1974.

(e) Memorandum dated July 17, 1979, from B.A. Martin to J.W. Affolter and, among others, Fred S. Venable.

(f) Exxon Company, USA Safety Standard No. 161,
Safe Handling of Asbestos.

(g) Memorandum dated August 11, 1972, from Fred S.
Venable to E.R. Felton and Walter Brock.

(h) Memorandum dated March 9, 1972, from F.S.
Venable to J.W. Hammond.

(i) Memorandum dated July 20, 1972, from Fred S.
Venable to E.R. Felton and W.H. Brock re asbestos regulations.

(j) Memorandum dated December 28, 1971, to CDS from
R.O. Laird.

(k) Memorandum dated January 7, 1972, from S.C.P.
to Ray.

(l) Memo reply dated July 21, 1972, from Walter
Brock.

RESPONSE TO REQUEST FOR ADMISSION NO. 2

Exxon objects to Request for Admission No. 2 because
it does not seek information which is admissible into evidence
nor is it reasonably calculated to lead to the discovery of
admissible evidence. Admissibility of these documents cannot
be established by evidence of Fred Venable's "business
activities," but rather can only be established by evidence of
Exxon's ordinary course of business. Subject to the foregoing
objections, Exxon denies the request for admission.

Submitted by:



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been mailed, postage prepaid to all counsel of record.

Baton Rouge, Louisiana, ^{March 6} February 11, 1991.



Gary A. Bezet