FILE NAME: Brown & Root (BR)

DATE: 2000

DOC#: BR002

DOCUMENT DESCRIPTION: Exhibit List (Not All Docs are in File)

WATERS & KRAUS

3219 McKinney Ave., Suite 3000
Dallas, Texas 75204
Telephone 214-357-6244
Telecopier 214-357-7252

104 West First Street
Cameron, Texas 76520
Telephone 254-605-0011
Telecopier 254-605-0020

DAVID C. GREENSTONE
greenstone@awpk.com

PLEASE RESPOND TO THE DALLAS OFFICE

August 29, 2000

VIA HAND DELIVERY

George Carlton
Godwin, White & Gruber
901 Main St., Suite 2500
Dallas, Texas 75202

Re: In Re: All Present and Future Waters & Kraus cases against Brown & Root.

Dear George,

Enclosed please find the Waters & Kraus, Brown & Root Exhibit List as well as all documents on the Waters & Kraus, Brown & Root Exhibit List.

My office previously sent these same documents to Phil Brown. I am re-sending them to you as a courtesy.

Please be advised that we are producing these documents to you in all present and future Waters & Kraus asbestos cases against Brown & Root.

If you have any questions or concerns, or need any additional information, please do not hesitate to call.

Sincerely,

DAVID C. GREENSTONE

DCG/cfg
Enclosures:
Brown & Root Exhibit List
All documents on the B&R Exhibit List (2 boxes)
cc: Peter Kraus
Andy Waters
Sherrie Pouzar
Phil Brown

BROWN & ROOT EXHIBIT LIST

EX. #	EXHIBIT DESCRIPTION
B&R-1	Article entitled "Occupational Health - Hazards of the Work Environment"
B&R-2	Exhibit "A" to the Notice of Deposition of Dale Drysdale
B&R-3	Article entitled "Occupational Cancers of the Respiratory Tract"
B&R-4	August 17, 1994 letter to Hans Siegel from James W. Hammond
B&R-5	Hammond report
B&R-6	Walsh Healy Act and Regulations
B&R-7	National Safety News, Vol. 32, No. 3 (1935)
B&R-8	Occupational Health Regulations, No. 3 from the Texas State Department of Health Division of Occupational Health: July 1958
B&R-9	Appendix C: U.S. Department of Labor-Occupational Safety and Health Administration Asbestos Regulations (1970)
B&R-10	1932 National Safety Council transactions (p-nsc-1)
B&R-11	1933 National Safety Council transactions (p-nsc-2)
B&R-12	1934 National Safety Council transactions (p-nsc-3)
B&R-13	1935 National Safety Council transactions (p-nsc-4)
B&R-14	1936 National Safety Council transactions (p-nsc-5)
B&R-15	1937 National Safety Council transactions (p-nsc-6)
B&R-16	1938 National Safety Council transactions (p-nsc-7)
B&R-17	1939 National Safety Council transactions (p-nsc-8)
B&R-18	1940 National Safety Council transactions (p-nsc-9)
B&R-19	1941 National Safety Council transactions (p-nsc-10)
B&R-20	1942 National Safety Council transactions (p-nsc-11)
B&R-21	1943 National Safety Council transactions (p-nsc-12)
B&R-22	1944 National Safety Council transactions (p-nsc-13)
B&R-23	1946 National Safety Council transactions (p-nsc-14)
B&R-24	1947 National Safety Council transactions (p-nsc-15)
B&R-25	1950 National Safety Council transactions (p-nsc-16)
B&R-26	1951 National Safety Council transactions (p-nsc-17)
B&R-27	1952 National Safety Council transactions (p-nsc-18)
B&R-28	1954 National Safety Council transactions (p-nsc-19)
B&R-29	1955 National Safety Council transactions (p-nsc-20)
B&R-30	1956 National Safety Council transactions (p-nsc-21)
B&R-31	1957 National Safety Council transactions (p-nsc-22)
B&R-32	1958 National Safety Council transactions (p-nsc-23)
B&R-33	1959 National Safety Council transactions (p-nsc-24)
B&R-34	1961 National Safety Council transactions (p-nsc-25)
B&R-35	1962 National Safety Council transactions (p-nsc-26)
B&R-36	1965 National Safety Council transactions (p-nsc-27)
B&R-37	1966 National Safety Council transactions (p-nsc-28)
B&R-38	1967 National Safety Council transactions (p-nsc-29)
B&R-39	1968 National Safety Council transactions (p-nsc-30)
B&R-40	1969 National Safety Council transactions (p-nsc-31)
B&R-41	National Safety Council's Health Practices Pamphlet No. 4, "Industrial Dust" (p-nsc-32)
B&R-42	National Safety Council's November 1936 "Industrial Health" pamphlet (p-nsc-33)
B&R-43	August, 1933 "National Safety News" (p-nsc-34)
B&R-44	July, 1933, "National Safety News" (p-nsc-35)
B&R-45	September, 1935, "National Safety News" (p-nsc-36)
B&R-46	1949 article, "What the Safety Engineer Should Know About Industrial Health Hazards," By H.K. Sessions

B&R-47 Brown & Root, Inc. and Associated Companies, Administrative Procedure, Section IV - Safety, June 1, 1963

B&R-48 Memo regarding Safety and Health Regulations for Construction dated April 27, 1971

B&R-49 OSHA Safety Memo #25 dated November 7, 1972

B&R-50 Memo regarding OSHA Safety Memo #22 and #25 dated November 16, 1972

B&R-51 Brown & Root Safety Procedures for Operations in Norwegian North Sea dated December 1972

B&R-52 Memo regarding Recordkeeping for Asbestos dated January 9, 1973

B&R-53 Memo regarding Asbestos and Fiberglass Sampling dated June 23, 1975

B&R-54 Letter from Dept. Of Health Education and Welfare dated August 8, 1975

B&R-55 Memo regarding Respiratory Protection dated January 14, 1976

B&R-56 Memo regarding Asbestos Recordkeeping Requirements dated April 1, 1976

B&R-57 Letter to Mr. Barry White, OSHA from Roger Tankersley dated September 27, 1976

B&R-58 Letter from U.S. Department of Labor to Roger Tankersley dated March 4, 1977

B&R-59 Memo regarding Galbestos roofing and siding material dated March 11, 1977

B&R-60 Memo regarding Asbestos - Cadwelding dated June 17, 1977

B&R-61 Memo regarding Asbestos Exposure dated September 28, 1977

B&R-62 Confidential Memo regarding asbestos monitoring and results dated November 15, 1977

B&R-63 Memo regarding OSHA Asbestos Standard dated April 5, 1978

B&R-64 Soltex Polymar Corporation memo regarding Safety and Environmental Checklist for the Solution Plant Dismantling — Revision dated January 26, 1979

B&R-65 1979 Correspondence Index

B&R-66 Memo regarding Asbestos Sampling dated November 26, 1979

B&R-67 Memo regarding Asbestos Sampling, Job Number 27-4180 dated December 9, 1980

B&R-68 Memo regarding Asbestos Sampling, Job Number 27-4180 dated April 28, 1981

B&R-69 List of OSHA Inspections at Brown & Root

B&R-70 Document entitled "What is Asbestos?"

B&R-71 "Asbestos Program" Brown & Root, Inc.

B&R-72 Defendants Brown & Root, Inc. and Brown & Root USA, Inc.'s Supplemental Answers to Plaintiff's Interrogatories and Requests for Production Propounded to Defendants in Hodge v. TU Electric.

B&R-73 Exhibits 1-36 from the John Hodges deposition taken on March 4, 1999.

B&R-74 Any and all documents, correspondence, contracts, work orders, etc. produced by Brown & Root to Plaintiff's counsel on June 28, 1999.

B&R-75 Any and all documents produced by Brown & Root in response to Plaintiff's Request for Production in the Lavelle Moore case, Cause No. 29668.

B&R-76 Any and all documents reflecting Brown & Root's membership in the Associated General Contractors of America; Any and all documents reflecting Brown & Root's membership in the Texas Branch of Associated Contractors of America.

B&R-77 History of Associated General Contractors, Builders for Progress by Boothe Mooney.

B&R-78 The deposition of Raymond Heit, taken in the case of Hodge v. TU Electric, and any and all exhibits and documents produced from that deposition.

B&R-79 The deposition of Delbert Ray Gaines taken in the case of Hodge v. TU Electric, and any and all exhibits and documents produced from that deposition.

B&R-80 The deposition of Dale Dreysdale taken in Hodge v. TU Electric, and any and all exhibits and documents produced from that deposition.

B&R-81 The deposition of Raymond Miller taken in the case of Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D, and any and all exhibits and documents produced from that deposition.

B&R-82 The deposition of John Hodges taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D, and any and all exhibits and documents produced from that deposition.

B&R-83 The deposition of Steve Sellers taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D, and any and all exhibits and documents produced from that deposition.

B&R-84 The deposition of Pete Johnson taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D, and any and all exhibits and documents produced from that deposition.

B&R-85 The deposition of Emil Zerr taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D, and any and all exhibits and documents produced from that deposition.

B&R-86 The deposition of Orval Bokken taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D , and any and all exhibits and documents produced from the Bokken deposition.

B&R-87 The deposition of Richard Schmidt taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D , and any and all exhibits and documents produced from the Schmidt deposition.

B&R-88 The deposition of James Hammond taken in the Russel Alan, French Hicks, Forrestier case, and any and all exhibits and documents produced at that deposition.

B&R-89 The deposition of Carl Richardson taken in Manuel Gonzales et. al v. Owens Corning Fiberglas Corporation, et al. Cause No. 95-04-1728-D , and any and all exhibits attached to that deposition and any and all documents produced at that deposition.

B&R-90 Any and all documents reflecting Brown & Roots' membership in the National Safety Counsel.

B&R-91 Any and all documents relating to Ismael Iglesias v. Southern

B&R-92 Excerpt, 51 Federal Register 22612, Final Rule. "Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite," (June 20, 1986) and Exhibit 123-A to that rulemaking, (Exhibit 123-A, Appendix B, Djocket H-033c). Reference to the Exhibit appears on page 22731.

B&R-93 Lone Star Constructor October 1924, page 1, 9-10.

B&R-94 Lone Star Constructor, 12/28, Roster

B&R-95 Lone Star Constructor, 9/30, page 14

B&R-96 Lone Star Constructor 10/30

B&R-97 Lone Star Constructor 11/30, "Now is the Time to Build!"

B&R-98 Lone Star Constructor 2/31, 5.

B&R-99 Associated General Contractors of America, Inc. (AGC), Directory of Membership, July, 1950.

B&R-100 AGC Directory of Membership, July, 1951.

B&R-101 AGC Directory of Membership, July 1952.

B&R-102 AGC Directory of Membership, July 1960.

B&R-103 1961 Annual AGC Directory

B&R-104 1962 Annual AGC Directory

B&R-105 Constructor Magazine, April, 1962, page 59.

B&R-106 Constructor Magazine, January, 1962, "New Literature."

B&R-107 "Houston Chapter AGC"

B&R-108 "Accident Prevention Manual for Industrial Operations," National Safety Council, 1946, p. 462 and excerpt.

B&R-109 "Accident Prevention Manual for Industrial Operations," 2nd Edition, National Safety Council, 1951, pp.22-7, 23-27 through 23-29.

B&R-110 "Accident Prevention Manual for Industrial Operations," 4th Edition, 1959, pp.iii, 41-7, 42-1 through 42-3, 42-6, 42-26.

B&R-111 "Accident Prevention Manual for Industrial Operations," 5th Edition, National Safety Council, 1964, pp. 39-6 through 39-9 and 40-18.

B&R-112 National Safety News, 9/56, "Guiding Principles of Medical Examinations in Industry"

B&R-113 National Safety News, 1/56, "The Safety Library," "New Guide Series Covers Industrial Hygiene," "Trade Publications."

B&R-114 National Safety News 2/56.

B&R-115 National Safety News, 6/56

B&R-116 "Brown & Root, Inc., engineers, constructors, Houston, Texas," 1950, published by Brown-Bilt.

B&R-117 "Design Report for a Waste Disposal System for Southland Paper Mills, Inc., Lufkin, Texas," Brown & Root, Inc., Engineers and Consultants, 1965 and attachments.

B&R-118 Pulp & Paper, August 1998. 79.
B&R-119 "In Memoriam, George R. Brown," March, 1983, Texas Civil Engineer, p.12.
B&R-120 "Those Amazing Brown Brothers," Everett Collier, Texas Parade, October, 1951.
B&R-121 "History of Southland's development," Southland Paper Mills, 1949.
B&R-122 Halliburton Company, annual report, 1998, Note 10 Annual Financial Statement.
B&R-123 "Environmental Enforcement TNRCC Air Quality Enforcement: Finally, Some Proposed Orders," Texas Industry Environmental Advisor, 1/6/94, Vol 7, No. 1.
B&R-124 Texas Register documents relating to the proposed $7000 fine against Brown & Root Services Corp. for failing to comply with NESHAP for asbestos at Fort Bliss, El Paso.
B&R-125 "Employers are turning to ADR for workplace disputes," Business Insurance, 5/15/95.
B&R-126 "Dallas woman's whistle-blowing to draw honor," Dallas Morning News, 6/20/91.
B&R-127 "Two named to split award for opposing Ku Klux Klan, " Baton Rouge Morning Advocate, 6/21/91.
B&R-128 "Lawsuit Alleges Power-Plant Work Damaged Painters' Health," San Antonio Business Journal, 1/17/92.
B&R-129 Documents relating to Ismael Iglesias et al. v. Southern Imperial Coatings Corp. et al.
B&R-130 "Hazards in the workplace/2,000 lawsuits/conditions at N-plants led to ailments, ex-workers say," Houston Chronicle, 11/1/92.
B&R-131 Excerpt, AGC Membership list, http://www.agc.ort/scripts/membership/listmembership.asp.
B&R-132 Excerpt, European Construction Institute Information Gateway, Brown &Root Ltd. Company Profile, http://info.lut.ac.uk/departments/cv/eci/index.html?32,14.
B&R-133 "Asbestos Removal," Statement, Carl D. Richardson, Brown & Root, Inc., Docket No. H-033C, U.S. Department of Labor, Exhibit 123-A, Appendix B.
B&R-134 Statement, Richard Boggs, Organization Resources Counselors, Inc., 5/25/84, Docket No. H-033C, U.S. Department of Labor, Exhibit 123-A and all appendices.
B&R-135 Business records affidavit of Sharon J. Cortez, custodian of the records for the Health Services Department of Exxon Company, U.S.A., an unincorporated division of Exxon Corporation; with fifty-eight (58) page attachment.
B&R-136 Disclaimer from September 1999 and Chapter 6 of 1999; Accident Prevention for Construction. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-137 Chapter 6: December 1992 Manual Accident Prevention. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-138 Articles from CONSTRUCTOR; January-December 1999. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-139 Articles from CONSTRUCTOR ; January-December 1998. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-140 Articles from CONSTRUCTOR; January-December 1997. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-141 Articles from CONSTRUCTOR; January-December 1996. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-142 Articles from CONSTRUCTOR; January-December 1995. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-143 Articles from CONSTRUCTOR; January-December 1994. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-144 Articles from CONSTRUCTOR; January-December 1993. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-145 Articles from CONSTRUCTOR; January-December 1992. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-146 Articles from CONSTRUCTOR; January-December 1991. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-147 Articles from CONSTRUCTOR; January-December 1990. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-148 Articles from CONSTRUCTOR; January-December 1989. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)
B&R-149 Articles from CONSTRUCTOR; January-December 1988. (Produced by Defendant Brown & Root to

Plaintiff on January 31, 2000.)

B&R-150 Articles from CONSTRUCTOR; January-December 1987. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-151 Articles from CONSTRUCTOR; January-December 1986. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-152 Articles from CONSTRUCTOR; January-December 1985. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-153 Articles from CONSTRUCTOR; January-December 1984. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-154 Articles from CONSTRUCTOR; January-December 1983. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-155 Articles from CONSTRUCTOR; January-December 1982. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-156 Articles from CONSTRUCTOR; January-December 1981. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.) * *June 1981 is missing*

B&R-157 Articles from CONSTRUCTOR; January-December 1980. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-158 Articles from CONSTRUCTOR; January-December 1979. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-159 Articles from CONSTRUCTOR; January-December 1977. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-160 Articles from CONSTRUCTOR; January-December 1976. (April 1976 pp.26-29.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-161 Articles from CONSTRUCTOR; January-December 1975. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-162 Articles from CONSTRUCTOR; January-December 1974. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-163 Articles from CONSTRUCTOR; January-December 1973. (May 1973 pp.26-28 and August 1973 pp. 26.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-164 Articles from CONSTRUCTOR; January-December 1972. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-165 Articles from CONSTUCTOR; January-December 1971. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-166 Articles from CONSTRUCTOR; January-December 1970. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-167 Articles from CONSTRUCTOR; January-December 1969. (November 1969 pp. 34 & 47.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-168 Articles from CONSTRUCTOR; January-December 1968. (March 1968 pp.34-35 and August 1968 pp. cover.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-169 Articles from CONSTRUCTOR; January-December 1967. (January 1967 pp.37-40 and August 1967 pp.32-33.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-170 Articles from CONSTRUCTOR; January-December 1966. (November 1966 pp.38-40.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-171 Articles from CONSTRUCTOR; January-December 1965. (March 1965, July 1965 pp.66 and September 1965 pp.30-36.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-172 Articles from CONSTRUCTOR; January-December 1964. (February 1964 pp.46-47.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-173 Articles from CONSTRUCTOR; January-December 1963. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-174 Articles from CONSTRUCTOR; January-December 1962. (January 1962 pp.62-63, April 1962 pp. 59 & 44, August 1962 pp. 38 and October 1962 pp. 46-47.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-175 Articles from CONSTRUCTOR; January-December 1961. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-176 Articles from CONSTRUCTOR; January-December 1960. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-177 Articles from CONSTRUCTOR; January-December 1959. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-178 Articles from CONSTRUCTOR; January-December 1958. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-179 Articles from CONSTRUCTOR; January-December 1957. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-180 Articles from CONSTRUCTOR; January-December 1956. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-181 Articles from CONSTRUCTOR; January-December 1955. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-182 Articles from CONSTRUCTOR; January-December 1954. (January 1954 pp. 60-66, February 1954 pp. 64-65, March 1954 pp. 81-82, May 1954 pp. 88-91 and September 1954 pp. 35-37.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-183 Articles from CONSTRUCTOR; January-December 1953. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-184 Articles from CONSTRUCTOR; January-December 1952. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-185 Articles from CONSTRUCTOR; January-December 1951. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-186 Articles from CONSTRUCTOR; January-December 1950. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-187 Articles from CONSTRUCTOR; January-December 1949. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-188 Articles from CONSTRUCTOR; January-December 1948. (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-189 Articles from CONSTRUCTOR; January-December 1947. (February 1947 pp. 42-44.) (Produced by Defendant Brown & Root to Plaintiff on January 31, 2000.)

B&R-190 OSHA citations and violations against Brown & Root. Taken from Occupational Safety & Health Administration/US Department of Labor website.

B&R-191 HOUSTON ACTION, Official Weekly Publication of the Houston Chamber of Commerce. January 6, 1951 pp. 1-4.

B&R-192 History of ANCO Insulation, Inc., November 29, 1971.

B&R-193 Brochure from the ABER Company.

B&R-194 Article from HOUSTON, August 1949. "Industrial Health Conference Oct. 14."

B&R-195 Article from HOUSTON, September 1949. "Industrial Health Conference Set for Houston October 6-7."

B&R-196 "Industrial Health Conference Scheduled for September 27-29."

B&R-197 "Industrial Health Meet Opens Here," dated October 12, 1950.

B&R-198 "Industrial Health Conference Set," dated September 27, 1953.

B&R-199 "News and Comment...Council on Industrial Health of the American Medical Association News Letter, November 30."

B&R-200 Article from INDUSTRIAL HYGIENE AND OCCUPATIONAL MEDICINE.

B&R-201 Article from AMERICAN INDUSTRIAL HYGIENE ASSOCIATION QUARTERLY.

B&r-202 Defendant Brown & Root, Inc. and Brown & Root, USA, Inc.'s Amended Responses to Plaintiff's Interrogatories and Requests for Production of Documents served on or about April 23, 1997. (Served by Defendant Brown & Root on Plaintiff's counsel on or about January 31, 2000.)

B&R-203 Brown & Root's Supplemental Responses to Plaintiffs' First Request for Admissions and Second Request for Production of Documents to Brown & Root, USA, Inc. (Served by Defendant Brown & Root on Plaintiff's counsel on or about January 31, 2000.)

B&R-204 Brown & Root's Amended Answers to Plaintiffs' Interrogatories and Requests for Production served on or about January 24, 1997. (Served by Defendant Brown & Root on Plaintiff's counsel on or about January 31, 2000.)

SPECIAL DELIVERY

Special Delivery Service, Inc. • 3720 Walnut Hill Lane • Dallas, Texas 75229

Fax To: Nancy Beets

Company Name: Waters & Kraus

Fax Number: 214-871-4963

Telephone Number: 214-357-6244

From: Roger

Company Name: SPECIAL DELIVERY SERVICE, INC.

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DELIVER TO:

Name: George Carleton

Company: Godwin White + Gruber

Address: 901 Main St. Ste. 2500

City: Dallas, TX Zip: 75202

X Susie Bankhead SIGNATURE

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3219 McKinney Avenue, Suite 3000
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Facsimile: 214-357-7252

TRANSMITTAL SHEET

DATE: 8/30/00

TO: Phil Brown

FAX #: 214-698-1101

FROM: David Greenstone

RE: Brown & Root Exhibits

NUMBER OF PAGES:

COMMENTS:

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THANK YOU.

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3219 McKinney Avenue, Suite 3000
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Telephone: 214-357-6244
Facsimile: 214-357-7252

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THANK YOU.