



NO. 98-04000-F

JESUS AMPORO LEAL, et al.	§	IN THE DISTRICT COURT
	§	
	§	
Plaintiffs,	§	
	§	
v.	§	NUECES COUNTY, TEXAS
	§	
OWENS CORNING, et al.,	§	
	§	
Defendants.	§	214 th JUDICIAL DISTRICT

DEFENDANT REYNOLDS METALS COMPANY'S
SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES

Defendant Reynolds Metals Company ("Reynolds"), by counsel, supplements its designation of expert witnesses whom it may call to testify at the trial of this matter as follows:

1. **Andrew Churg, M.D.**
The University of British Columbia
2211 Wesbrook Mall
Vancouver, B.C. Canada V6T1W5
(604) 875-4480

Dr. Churg is a board-certified pathologist whom Reynolds may call as an expert witness at the trial of this matter to provide testimony regarding any and all medical issues in the case. His testimony may include, but is not limited to, the nature of asbestos and asbestos-related diseases generally; the nature and extent of any asbestos-related disease or injury which Plaintiff Scott may have; the history of evolution and knowledge of asbestos-related diseases; the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and the medical condition of the Plaintiff, including Plaintiff's allegation that his colon cancer was caused by asbestos exposure, to the extent such evidence is admitted in the Plaintiff's case in chief; and, the relative importance of various fiber types and the cause of various asbestos-related

related diseases; causation; and, asbestos medicine in general. Such testimony is expected to be based on his review of Plaintiff Scott's medical records, pathology materials, x-rays, any and all deposition transcripts, documents produced in discovery and published and unpublished reports.

Dr. Churg further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**2. John E. Craighead, M.D.
1845 Four Winds Road
Ferrisburgh, Vermont 05456
(802) 425-3480**

Dr. Craighead is a pathologist with the Department of Pathology, University of Vermont, College of Medicine in Burlington, Vermont whom may call to testify at the trial of this matter, either live or by deposition. His testimony may include, but is not limited to, the nature of asbestos and asbestos-related diseases generally; the nature and extent of any disease or injury which Plaintiff Scott may have; the history of evolution and knowledge of asbestos-related diseases; the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and the medical condition of the Plaintiff, including Plaintiff's allegation that his colon cancer was caused by asbestos exposure, to the extent such evidence is admitted in the Plaintiff's case in chief.; and, the relative importance of various fiber types and the cause of various asbestos-related diseases; causation; and, asbestos medicine in general. Such testimony is expected to be based on his review of Plaintiff Scott's medical records, pathology materials, x-rays, any and all deposition transcripts, documents produced in discovery and published and unpublished reports.

Dr. Craighead further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**3. Daniel R. Fischel
Lexecon, Inc.
332 South Michigan Avenue
Chicago, Illinois 60604
(312) 322-0209**

Daniel Fischel is an expert economist whom Reynolds may call as a witness at the trial of this matter to offer expert testimony as to any and all economic and damages issues in this case. He is expected to rebut any expert economic testimony offered on behalf of the Plaintiff regarding the financial condition and/or valuation of Reynolds, its economic investments and contributions locally and nationally, and any other factor relevant to the determination of a punitive damages award, including, but not limited to, the nature of punitive damages in general, their economic incentives and disincentives, their purpose and effect, and, specifically, the effect of a punitive damage award on Reynolds' financial position and liabilities.

Mr. Fischel further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

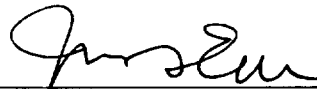
4. **William M. Landes, Ph.D.**
The University of Chicago Law School
1111 East 60th Street
Chicago, Illinois 60637
(312) 702-9606

Dr. Landes is a professor of law and economics at the University of Chicago School of Law whom Reynolds may call as a witness at the trial of this matter to offer expert testimony as to any and all economic and damages issues in this case. He is expected to rebut any expert economic testimony offered on behalf of the Plaintiff regarding the financial condition and/or valuation of Reynolds, its economic investments and contributions locally and nationally, and any other factor relevant to the determination of a punitive damages award, including, but not limited to, the nature of punitive damages in general, their economic incentives and disincentives, their purpose and effect, and, specifically, the effect of a punitive damage award on Reynolds' financial position and liabilities.

Dr. Landes further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

REYNOLDS METALS COMPANY

By: _____



David Craig Landin (Texas Bar No. 11863720)

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2000, a true and correct copy of the above and foregoing instrument is being served by facsimile and certified mail, return receipt requested, on the following

Plaintiff's counsel:

Stephanie A. Finch, Esq.
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

All other known counsel of record are being served by facsimile and by regular United States Mail.

