

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 CORPORATION'S AMENDED RESPONSES TO CONSOLIDATED
REQUESTS FOR ADMISSIONS, INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS

Exxon Corporation ("Exxon"), defendant, hereby
amends its original response as follows:

1.

Exxon's response to Interrogatory No. 1.2(a) is
hereby deleted in its entirety and in its place the following
response is given:

RESPONSE TO INTERROGATORY 1.2

(a) Exxon objects to part (a) of this
interrogatory as ambiguous and insufficiently clear,
particularly the phrase "asbestos contained insulation," which
has no meaning to this defendant, and also objects to part (a)
as vague and ambiguous and overly broad, burdensome, and
irrelevant in that no specific location is set forth to
restrict the meaning of "present" to those locations where
plaintiff alleges to have worked. Without waiving these
objections, Exxon further states that this defendant is unsure
what is asked by this question; Exxon has admitted in response
to Request for Admission 1.1 that asbestos-containing
insulation was present at its Baton Rouge facility during the
1935-1980 time period, which includes the 1950-1952 time
period. Without waiving its objections, Exxon does not know
and cannot affirm or deny Interrogatory 1.2(a) because Exxon's
investigation to date indicates that neither Cat Cracker I or
II or any other Cat Cracker was built at Exxon's Baton Rouge
refinery in 1950-1952 as described in this interrogatory, but

our search for relevant information continues and Exxon will supplement its responses in accord with applicable rules as necessary.

2.

Exxon deletes its response to Interrogatory No. 2.3 in its entirety and substitutes therefor a new response to Interrogatory No. 2.3 which reads as follows:

RESPONSE TO 2.3 INTERROGATORY

Exxon objects to this interrogatory by incorporating herein its objections to 2.1 above. Without waiving its objections, Exxon also objects that this interrogatory is overly broad and vague, and that it would be impossible for this defendant, which employed literally thousands of people in this time period, to know of every such "recommendation, report or suggestion" ever made, at any place and time, by anyone to anyone within the company, whether written or oral, and to expect this defendant to undertake such an investigation would be unduly burdensome. Without waiving its objections, Exxon states that the "Medico-Safety Survey" by Roy S. Bonsib dated 1937 sets forth recommendations pertaining to the relationship between certain asbestos exposures and asbestosis, and we believe that these recommendations were communicated and formed the basis for most or all recommendations made by Exxon employees concerning safe handling of asbestos-containing insulation until the advent of the Occupational Safety and Health Agency (OSHA) regulations governing this area.

3.

In all other respects, Exxon's original responses remain the same.

Submitted by:



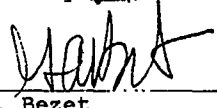
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CERTIFICATE OF SERVICE

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

Baton Rouge, Louisiana, February 19, 1991.



Gary A. Bezet