PLAINTIFF'S EXHIBIT
GIL-1

NO. 97-4054-F

MARIO RAMIREZ,	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
VS.	§	NUECES COUNTY, TEXAS
	§	
OWENS CORNING (a/k/a OWENS CORNING CORPORATION); ET AL	§	
	§	
Defendants.	§	214th JUDICIAL DISTRICT

DEFENDANT GILMAN INSULATION COMPANY'S RESPONSES TO PLAINTIFF MARIO RAMIREZ' RULE 194 REQUEST FOR DISCLOSURE

TO: Plaintiff, Mario Ramirez, by and through his attorney of record, Ms. Holly J. W. Huart and Ms. Stephanie Finch, BARON & BUDD, P.C., Centrum Bldg., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

COMES NOW GILMAN INSULATION COMPANY, Defendant in the above styled and numbered cause, and pursuant to Rule 194 of the Texas Rules of Civil Procedure responds and answers in writing those Request for Disclosure propounded by Plaintiff.

Respectfully submitted,

James E. Perschbach
State Bar of Texas No. 00797236

ATTORNEY FOR DEFENDANT, GILMAN INSULATION COMPANY

OF COUNSEL:

MEREDITH, DONNELL & ABERNETHY
1500 One Shoreline Plaza, North Tower
Post Office Box 2624
Corpus Christi, Texas 78403-2624
Telephone No.: (361) 888-5551
Telecopier No.: (361) 880-5718

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been sent via Certified Mail, Return Receipt Requested, to Ms. Holly J. W. Huart and Ms. Stephanie Finch, BARON & BUDD, P.C., Centrum Bldg., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281, and to all known defense counsel via U.S. First Class Mail, on this the 5 day of March, 2001.

James E. Perschbach

RESPONSES TO REQUEST FOR DISCLOSURE

(a) **The correct names of the parties to this lawsuit.**

RESPONSE:

Although denying any liability this Defendant's correct legal name was Gilman Insulation Company. This Defendant believes but it has no corporate knowledge that the others parties to this lawsuit have been identified by their correct legal names.

(b) **The name, address, and telephone number of any potential parties.**

RESPONSE:

This Defendant is unaware of any potential parties.

(c) **The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).**

RESPONSE:

This Defendant denies that it intentionally injured the Plaintiff.

(e) **The name, address and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.**

RESPONSE:

1. Chip Hough
   Gilman Insulation Company
   By and through Clay E. Coalson
   Meredith, Donnell & Abernethy
   P. O. Box 2624
   Corpus Christi, Texas 78403
   (361) 888-5551