PLAINTIFF'S EXHIBIT

ZUR-15

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cc: Ben D.

DEC. 30 99* 16:77

To Ben D.

CAUSE NO. CC-99-8033-B

MALCOLM LEE MURPHY, JR. and ANNETTE HARBERT MURPHY,	§	IN THE COUNTY COURT OF
	§	
	§	AT LAW NO. 2
VS.	§	
	§	
OWENS-CORNING, ET AL	§	DALLAS COUNTY, TEXAS

DEFENDANT ZURN INDUSTRIES, INC.'S RESPONSES TO PLAINTIFFS' REQUEST FOR DISCLOSURE

TO: Plaintiffs, by and through their attorney of record, Mr. Russell Budd, Baron & Budd, 3102 Oak Lawn Ave., Suite 1100, Dallas, Texas 75219.

COMES NOW, Defendant ZURN INDUSTRIES, INC., and makes and files this its Responses to Plaintiff's First Request for Disclosure and Production of Documents to Defendant pursuant to Texas Rule of Civil Procedure 194.2.

Respectfully submitted,

DEHAY & ELLISTON, L.L.P.
3500 Bank of America Plaza
901 Main Street
Dallas, Texas 75202
(214) 210-2400
(214) 210-2500 FAX

By: _____
KATHRYN HERMES
SBN: 15156500

01254586

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been sent to counsel for Plaintiff by certified mail, return receipt requested, on this the 28th day of December, 1999.

KATHRYN HERMES

DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUEST FOR DISCLOSURE TO DEFENDANT

1. You are hereby requested to disclose, within the time period prescribed by the Texas Rules of Civil Procedure, the information or material described in all of Rule 194.2 and all of its subparts.

(a) State the correct name of Defendant.

RESPONSE:

Defendant's correct legal name is Zurn Industries, Inc.

(b) State the names, addresses and telephone numbers of Defendant.

RESPONSE:

Zurn Industries, Inc.'s principal place of business is 14801 Quorum Dr., Dallas, Texas 75240.

(c) State the legal theories and, in general, the factual bases of your claims or defenses.

RESPONSE:

Please see Defendant's Answer and any amendments or supplements thereto which state the legal theories and the general bases of Defendant's claims and/or defenses. Defendant denies that Plaintiff(s)' injuries are asbestos-related or that exposure to this Defendant's products caused or contributed to Plaintiff's alleged injuries or damages.

(d) State the amount and any method of calculating economic damages.

RESPONSE:

Defendant is not alleging any economic damages in this lawsuit. Furthermore, it cannot address the method of calculating economic damages until additional discovery is conducted.

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

RESPONSE:

Theodore C. Fuhrman, Chief Engineer, Aalborg Industries, Inc., 5300 Knowledge Parkway, Suite 200, Erie, PA 16510;

Theodore Morad, Jr., Assistant Manager - Customer Service, Aalborg Industries, Inc., 5300 Knowledge Parkway, Suite 200, Erie, PA 16510;

Robert Seibel, RMR Technical Services, Inc., 5650 Gardner Drive, Erie, PA 16509.

The individuals listed are employees or former employees of Zurn Industries, Inc. who may have knowledge of products Zurn Industries, Inc. or its predecessor manufactured or distributed, the asbestos content of same, if any, as well as general information concerning Zurn Industries, Inc., its size, its size relative to the market and competitors, its knowledge, if any, of potential health hazards related to asbestos exposure, state-of-the-art, and depending on the allegations raised by an individual Plaintiff, other relevant issues to particular Plaintiffs' cases.

Defendant may also call Plaintiff(s)' co-workers who are designated by Plaintiff(s) to testify concerning Plaintiff(s)' exposure to various asbestos-containing products, work environment, safety precautions taken, and jobsite information.

(f) For any testifying experts, state and/or provide the following information:

(1) name, address and telephone number;

(2) the subject matter on which the expert will testify; and

(3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information.

RESPONSE:

The following individuals may be used by Defendant Zurn Industries, Inc. as expert witnesses:

Dr. Elvin Adams, Route 4, Box 614-B, Burleson, Texas 76028, 11803 South Freeway, Suite 201, Fort Worth, Texas 76115. Dr. Adams is a medical doctor and a board certified specialist in internal medicine. His testimony will discuss the structure and function of the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

Professor Howard E. Ayre, Department of Environmental Health, College of Medicine, Kettering Laboratory (056), University of Cincinnati, Cincinnati, Ohio 45267. Professor Ayre will testify as to the history of TLV; State of the Art as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants and of various products; industrial hygiene; the potential of exposure in excess of the TLV as it

concerns certain asbestos containing products; product warnings; the dust levels created by this defendant's products; and probable time periods of exposure in relation to causation of mesothelioma and percentage of probability of causation from first exposure to last exposure.

Steven M. Ayers, M.D., Department of Internal Medicine, 1325 South Grand Avenue, St. Louis, Missouri 63104. Dr. Ayers will testify as to the historical review and state of the art of pulmonary medicine and asbestos-related conditions. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a bases for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Moran, and Lampshear, among others.

Edward J. Baier, 9754 Hatmark Court, Vienna, Virginia 22181; (703) 281-9501. Mr. Baier is an industrial hygienist who will testify concerning state of the art as it relates to asbestos.

Fred Bass, Bass Consultants, Inc., 530 Wells Fargo, Suite 101, Houston, Texas 77090. Mr. Bass may testify about the economic aspects of the case.

Dr. Joseph Bates, 4300 West 7th Street, Little Rock, Arkansas 72205. Dr. Bates will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Dr. Bates will also testify concerning those areas described for witnesses Demopoulous, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Kenneth J. Boudreaux, Ph.D., Dan M. Cliffe, J. Stuart Wood, Consulting Economists, A.B. Freeman School of Business, Tulane University, 1424 Bourdeaux, New Orleans, Louisiana 70115. Dr. Boudreaux, Mr. Cliffe and Mr. Wood are economic consultants and may testify regarding Plaintiff's economic loss, past, current, and future, if any.

Thomas Boylen, M.D., 1200 N. State Street, Los Angeles, California 90033. Dr. Boylen will testify as to general and asbestos-related pulmonary medicine examination procedures.

Dr. Brian Bradley, The Lung Center, 403 Woodlawn, Pasadena, Texas 77504. Dr. Bradley is a specialist in the area of respiratory diseases. Dr. Bradley will testify as to all matters pertaining to his examination of the plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Bradley will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.

Kevin Browne, M.D., 66a Warwick Way, London, England SW1V 1RZ. Dr. Browne will testify as to cancer issues, e.g., cancer risk, relationship between asbestosis and lung cancer,

carcinogenicity of worksite and environmental chemicals and substances, environmental chemicals and substances, and epidemiology relevant thereto.

Louis Burgher, M.D., Ph.D., 145 North Tower Doctors Building, 4242 Farnam Street, Omaha, Nebraska 68131, (402) 559-2900. Dr. Burgher will testify as to the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. He may also testify concerning epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dohrman H. Byers. Mr. Byers was the Chief of Analytical Chemistry Service, United States Department of Public Health from 1948 through 1959. He will testify about how he and the United States Public Health Service determined how to apply the Threshold Limit Value for asbestos during the period of time which he occupied that position. A copy of his Curriculum Vitae will be made available to counsel, and prior testimony is also available.

Dr. Sam H. Cade, Jr., Radiology Department, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75242. Dr. Cade is a specialist in the area of respiratory diseases. Dr. Cade will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof.

Dr. Edwin Cadman, M.D., University School of Medicine, 333 Cedar Street, New Haven, CT 06510. Dr. Cadman is a licensed physician and Professor of Medicine who specializes in oncology. He is expected to testify as to the history and development of medical knowledge concerning asbestos-related disease. He may also testify regarding the relationship, if any, between asbestos and Plaintiff's medical condition.

Dr. Philip Cagle, Baylor College of Medicine, One Baylor Plaza, 6565 Fannin, MS 205, Houston, Texas 77030. Dr. Cagle is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition; to the effects of exposure to chrysotile fibers on the human body; and to all matters pertaining to the Plaintiff's medical condition.

Dr. Greg Casar, Respiratory Consultants of Houston, Smith Tower, 6550 Fannin, Suite 2403, Houston, Texas 77030. Dr. Casar is a specialist in the area of respiratory disease. Dr. Casar will testify as to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether Plaintiff suffers from asbestos-related disease and the basis for such opinion; the Plaintiff's current medical condition and his prognosis in regard to the Plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Andrew Churg, The University of British Columbia, 2211 Westbrook Mall, Vancouver, B.C. Canada V6T1WS. Dr. Churg is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and to the effects of exposure to chrysotile fibers on the human body.

Dr. Joseph Cimino, New York Medical College, 50 Willard Avenue, North Tarrytown, NY 10591. Dr. Cimino is presently Professor and Chairman of the Department of Community and Preventative Medicines New York Medical College, Valhalla, New York. Dr. Cimino may be expected to testify generally about research in the area of pulmonary pathology and about the process by which medical knowledge evolved. He may also be expected to testify regarding the state of medical knowledge from the early part of the century to the middle 1960's as it regards pathological changes due to exposure to asbestos and about his conclusions regarding his studies conducted by the Saranac Laboratories as they related to the state of the medical knowledge at that time. This Defendant believes that Dr. Cimino is of the opinion that prior to the 1960's the state of the medical art was that exposure to large amounts of asbestos over an extended period of time could cause asbestosis; however, there was an accepted, safe level of exposure below which there was no risk of harm; that this level was accepted by the medical and scientific community; and that there was no acceptance of a link between asbestosis and mesothelioma or any form of cancer until the 1960's. The opinions of Dr. Cimino are based upon his training in medicine, his

extensive professional qualifications, his research in pulmonary pathology and his review of the relevant medical literature.

He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Thomas V. Colby, M.D., Department of Laboratory Medicine and Pathology, Mayo Clinic, 200 1st Street, S.W., Rochester, Minnesota 55905. Dr. Colby will testify as to general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology and medical testimony as to medical condition and specific plaintiffs as identified during ongoing discovery.

Warren Cook, 6376 Plankton Drive, Columbus, Ohio (614) 864-5277. Mr. Cook is an industrial hygienist who will testify concerning state of the art regarding asbestos.

Bobby F. Craft, Industrial Health, Inc., 640 East Wilmington Avenue, Salt Lake City, Utah 84106. Dr. Craft will testify as to the history of TLV; State of the Art as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants; the potential of exposure in excess of the TLV as it concerns certain asbestos containing products; and the dust levels created by this defendant's products.

Dr. John E. Craighead, Department of Pathology, A249 Given Medical Building, University of Vermont College of Medicine, Burlington, Vermont 05401, (802) 863-8733. Dr. Craighead is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and the effects of exposure to chrysotile fibers on the human body.

James Crapo, M.D., Duke University Medical Center, Box 3177, Room 350 Bell Bldg., Durham, N.C. 27710, (919) 684-6266. Dr. Crapo will testify as to the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related disease in general, and the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) and fiber types of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

J.N.P. Davies, 5 Pine Street, Albany, New York. Mr. Davies will testify as to the state of medical and scientific art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. George Delclos, Respiratory Consultants of Houston, Smith Tower, 6550 Fannin, Suite 2403, Houston, Texas 77030. Dr. Delclos is a specialist in the area of respiratory disease. Dr. Delclos will testify as to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether Plaintiff suffers from asbestos-related disease and the basis for such opinion; the Plaintiff's current medical condition and his prognosis in regard to the Plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Scott Donaldson, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, TX 75080. Dr. Donaldson is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-

asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

William Dyson, Ph.D., Health & Hygiene, Inc., 420 Gallimore Dairy Road, Greensboro, North Carolina. Dr. Dyson will testify as to the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. William Emory, M.D., Ochsner Clinic, 1514 Jefferson Highway, New Orleans, Louisiana 70121, (504) 838-4055. Dr. Emory is a medical doctor. He may testify regarding the medical condition of the Plaintiff and about asbestos-related diseases.

Dr. William Eschenbacher, Baylor College of Medicine, Department of Internal Medicine/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Eschenbacher will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Melvin W. First, Harvard School of Public Health, 655 Huntington Avenue, Boston, MA 02115. Dr. First is expected to testify on matters relating to industrial hygiene, including the

methodology of conducting industrial hygiene surveys and reporting and publishing results of industrial hygiene surveys.

Dr. Gregory Foster, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, TX 75080. Dr. Foster is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Theodore C. Fuhrman, Chief Engineer, Aalborg Industries, Inc., 5300 Knowledge Parkway, Suite 200, Erie, PA 16510 (800) 322-5995. Mr. Fuhrman was employed by Zurn Industries, Inc., Energy Division, from 1972 to 1997 and has knowledge of the types of products Defendant and its predecessor manufactured, whether those products contained asbestos-containing materials as well as being knowledgeable as to the operation, installation, and repair of Zurn's steam generating products. Mr. Fuhrman may also testify about the types of trades or crafts which may work and/or be exposed to Defendant's products. He may further testify concerning the extent of Defendant's knowledge of potential asbestos health hazards.

Dr. Edward A. Gaensler, Boston University Medical Center, 800 East Concord Street, Boston, Massachusetts 02118. Dr. Gaensler, will testify as to the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis, compared with non-asbestotic asbestos workers and with the general population; cigarette smoking and its effect on the lung; the relationship of cigarette smoking to cancer of the

lung and cancers of other sites with reference to epidemiological studies and physiologic effect; difference between impairment and disability; effect of asbestosis on disability and life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; and the history of evolution and knowledge of asbestos-related diseases.

Dr. Joe G.N. Garcia, The University of Texas Health Center at Tyler, P.O. Box 2003, Tyler, Texas 75710. Dr. Garcia will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Ignacio Garza, 745 East Street, Brownsville, Texas 78520 (512) 546-1655. Mr. Garza is an economist and will testify regarding the plaintiffs' economic damages and related matters.

Allen Gibbs, M.D., Llandough Hospital, Penarth, Glamorgan CF6 1XW. Dr. Gibbs will testify as to the general asbestos-related pulmonary pathology and medical literature relevant thereto; general and asbestos-related pulmonary examination procedures.

Jeffrey A. Golden, M.D., Room 539A, University of California, San Francisco, California 94117. Dr. Golden will testify as to the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Milton Gray, 521 Crestbend, Houston, Texas. Dr. Gray is a medical doctor and a board certified specialist in internal medicine. His testimony will discuss the structure and function of

the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

Dr. Donald Greenberg, One Baylor Plaza, Baylor College of Medicine, 6565 Fannin, Houston, Texas 77030. Dr. Greenberg is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition; to all state of the art issues.

Kathryn A. Hale, Pulmonary Section, F907, Methodist Hospital, 6565 Fannin, Houston, Texas 77030. Dr. Hale is a specialist in the area of respiratory disease. Dr. Hale will testify as to all matters pertaining to her examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; her opinion as to whether Plaintiff suffers from asbestos-related disease and the basis for such opinion; the Plaintiff's current medical condition and her prognosis in regard to the Plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. R. Brent Harrison, M.D., The University of Mississippi Medical Center, Department of Radiology, 2500 North State Street, Jackson, Mississippi 39216, (601) 984-2515. Dr. Harrison is a B Reader and may testify regarding the radiographs of the Plaintiff and/or Plaintiff's decedent.

Dr. Peter Heidbrink, Southwest Pulmonary Associates, 3200 N. MacArthur Blvd., Suit 104, Irving, Texas 75061. Dr. Heidbrink is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical

condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Michael D. Henderson, 330 Rittiman Road, San Antonio, Texas 78209. Dr. Henderson may testify concerning the relationship of asbestosis and smoking to the development of cancer. Dr. Henderson may also testify concerning the incidence of lung cancer among individuals with asbestos or exposure to asbestos-containing products. He may also testify regarding general pathology and the pathology of the Plaintiff or Plaintiff's decedent.

Dr. Elliott Hinkes, 301 North Prairie Avenue, Suite 311, Inglewood, California 90301. Dr. Hinkes is a specialist in the area of oncology. Dr. Hinkes may testify as to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; as to exposure to asbestos in regard to development of lung cancer, mesothelioma and other respiratory diseases; as to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion as to whether Plaintiff suffers from a respiratory disease and cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and all other matters concerning Plaintiff's medical condition.

H. Corwin Hinshaw, Sr., Retired Emeritus Professor of Medicine, University of California, School of Medicine, P.O. Box 546, Belvedere, California 94920. Dr. Hinshaw will testify by deposition about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system.

Dr. John R. Holcomb, 4410 Medical Drive, Suite 440, San Antonio, Texas 78229, (210) 692-9400. Dr. Holcomb is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of

asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Thomas Peter Howard, Osler Medical Center, 930 South Harbor City Boulevard, Melbourne, FL 32901, (407) 725-5050. Dr. Howard is expected to testify on matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of Plaintiffs. He may also testify about the state of the scientific and medical knowledge concerning asbestos. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Janet Hughes, M.D., Tulane School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Hughes is a biostatistician with expertise in the areas of statistics and epidemiology. She is capable of testifying regarding the dose-response relationship between asbestos exposure and the occurrence of disease, the effect of low level exposure to asbestos, the statistical methods of assessing risks, and other medical issues relating to lung disease and cancer.

William Hughson, M.D., 3969 4th Avenue, Suite 202, San Diego, California 92103. Dr. Hughson will testify as to the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Robert Jones, Tulane Medical School, Pulmonary Diseases Section, 1700 Perdido Street, New Orleans, Louisiana 70112, (504) 588-5265. Dr. Jones is a specialist in the area of respiratory diseases. Dr. Jones will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's

family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof.

Dr. Gerald Kerby, M.D., Pulmonary Specialist, University of Kansas Medical Center, 3900 Cambridge, Kansas City, Kansas 66103. Dr. Kerby is a pulmonary diseases specialist. He will testify to all matters pertaining to scientific knowledge, research and study of the effects of exposure to asbestos on the human body; to the latency periods of asbestos-related diseases; to the various types of asbestos fibers and their effects on the human body; to the effects of exposure to chrysotile fiber in regard to asbestos-related diseases; scientific criteria used to diagnose respiratory diseases, including but not limited to asbestosis, lung cancer, mesothelioma, to all matters pertaining to the Plaintiff's medical condition; to all state of the art issues. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Marvin Kushner, M.D., State University of New York at Stoney Brook, Health Sciences Center, Basic Science Tower 9, Room 140, Stoney Brook, New York 11794. Dr. Kushner will testify as to the general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. He may also offer medical testimony as to the medical condition of specific plaintiffs as identified during ongoing discovery.

Dr. Robert Lampert, Baylor College of Medicine, Department of Internal Medicine/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Lampert will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Jeffrey S. Lee, Building 512, University of Utah, Salt Lake City, Utah 84112. Dr. Lee will testify that the medical community became aware that insulators with prolonged, intense exposure might be at risk for asbestos-related diseases in the late 1960's or early 1970's.

Lester Levin, c/o Drexel University, Philadelphia, Pennsylvania.

James E. Lockey, M.D., M.S., Institute of Environmental Health, University of Cincinnati Medical Center, 5251 Medical Science Building, M.L. 182, 231 Bethesda Avenue, Cincinnati, Ohio 45267. Dr. Lockey will testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related disease, and the effect of other substances on the respiratory system. Dr. Lockey will give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Forde A. McIver, Pathology Associates, P.A., 135 Rutledge Avenue, Charleston, South Carolina 29401. Dr. McIver will testify about the state of the scientific and medical art concerning the potential hazards of asbestos.

Dr. Joseph M. Miller, Box 365, New Hampton, NH 03264, (603) 536-3732. Dr. Miller will testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system.

Mr. Theodore Morad, Chief Engineer, Aalborg Industries, Inc., 5300 Knowledge Parkway, Suite 200, Erie, PA 16510 (800) 322-5995. Mr. Morad was employed by Zurn Industries, Inc., Energy Division, from 1972 to 1997 and has knowledge of the types of products Defendant and its predecessor manufactured, whether those products contained asbestos-containing materials as well as being knowledgeable as to the operation, installation, and repair of Zurn's steam generating products. Mr. Morad may also testify about the types of trades or crafts which may work and/or be exposed to Defendant's products. He may further testify concerning the extent of Defendant's knowledge of potential asbestos health hazards.

Robert Morgan, M.D., 520 Third Street, Suite 208, Oakland, California 94607. Dr. Morgan will testify concerning cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

Dr. William K. C. Morgan, University Hospital, University of Western Ontario, P.O. Box 5339, Postal Station A, London, Ontario N6A 5A5. Dr. Morgan is a Professor of Medicine and Director of Chest Diseases Services at the University of Western Ontario. He was educated in England and Scotland, and among other appointments, is a member of the Advisory Board for

Occupational Health & Safety Resource Center at the University of Western Ontario. He has knowledge of the pathology, diagnosis, testing and causation of pulmonary and related disease, including mesothelioma, lung cancer and asbestosis. He will testify about the state of the medical art as it relates to knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. He may testify about the Plaintiff's medical condition. Dr. Morgan will give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Gerald L. Myers, M.D., Alta Bates Hospital, 3001 Colby Plaza at Ashby, Room 2737, Berkeley, CA 94705. Dr. Myers is a Board Certified pulmonary physician and NIOSH Certified "B" Reader. Dr. Myers will testify about the effects of pleural changes on lung function, the progression of asbestos-related lung disease, the risks of lung cancer in asbestos-exposed individuals with and without asbestosis, and the risk of cancers other than lung cancer and mesothelioma among asbestos-exposed individuals. A copy of his Curriculum Vitae will be made available to counsel, as well as transcripts of his prior testimony.

Dr. Robert O'Neal, M.D., Route 1, Box 168, Perkinston, Mississippi 39573. Dr. O'Neal is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition; to all state of the art issues.

David L. Page, M.D., Vanderbilt University Medical School, 1211 22nd Avenue South, Room C-3311, Medical Center North, Nashville, Tennessee 37232. Dr. Page will testify concerning general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, and epidemiology. He may offer medical testimony as to the medical condition of specific plaintiffs as identified during ongoing discovery.

Jack E. Peterson, M.D., 2830 Via Viejas Oeste, Alpine, California 91901. Dr. Peterson will testify concerning industrial hygiene issues including threshold limit values, historical review and state of the art of pulmonary medicine and asbestos-related conditions. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Stanley Pier, 30240 - 27th Avenue South, Federal Way, Washington 98003, (206) 941-3819. Dr. Pier is a toxicologist who will testify concerning state of the art of asbestos.

Dr. A. Mitchell Polinsky, Stanford University, Professor of Law and Economics, Crown Quadrangle, Stanford, California 94306-8610. Dr. Polinsky is an expert who will testify about the inappropriateness of punitive damages in this and similar cases based upon research he and others have conducted.

Charles Powell, Cohrssen Environmental, 2970 Pine Street, San Francisco, California 94115. Mr. Powell will testify concerning industrial hygiene and threshold limit value testimony, product testing, emissions, development of knowledge regarding asbestos exposure, product and/or documentary testimony relevant to the defense of plaintiff(s) claims.

Dr. John Ritter, Division of Surgical Pathology, Suite 300, Peters Building, Washington University Medical Center, One Banes Hospital Plaza, St. Louis, MO, 63110 (314) 362-0101. Baylor College of Medicine, One Baylor Plaza, 6565 Fannin, MS 205, Houston, Texas-77030. Dr. Ritter is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition; to the effects of exposure to chrysotile fibers on the human body; and to all matters pertaining to the Plaintiff's medical condition.

Dr. Victor L. Roggli, Duke University Medical Center, Box 3712, Durham, NC 27710, (919) 684-8111. Dr. Roggli is a pathologist who has authored publications in the area of asbestos-associated disease. He is capable of testifying regarding lung burden and the level of asbestos burden which is necessary to cause disease. He is further capable of testifying regarding non-asbestos induced mesothelioma, different types of asbestos fibers and their effect on human lungs, dose-response relationships and the occurrence of disease, the anatomy of the lung, and other medical issues relating to asbestos disease, cancer, and mesothelioma. Dr. Roggli's testimony will be based upon his education, experience, and the literature in his fields of expertise.

Robert Marshal Ross, M.D., 17030 Nanes Dr., Suite 214, Houston, Texas 77090. Dr. Ross is a specialist in the area of respiratory disease. Dr. Ross will testify as to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether Plaintiff suffers from asbestos-related disease and the basis for such opinion; the Plaintiff's current medical condition and his prognosis in regard to the Plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis

and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Ross will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Nicholas Sargent, M.D., 1200 N. State Street, Los Angeles, California 90033. Dr. Sargent will testify concerning the general pulmonary radiology and/or ILO interpretation of x-rays.

Mr. John Sartain, Consulting Economist, Sartain & Company, 3811 Turtle Creek Centre, Suite 760, Dallas, Texas 75219. Mr. Sartain is an economic consultant and may testify regarding the economic loss incurred by the death of a Plaintiff.

Mr. Robert Seibel, RMR Technical Services, Inc., 5650 Gardner Drive, Erie, PA 16509. Mr. Seibel was employed by Zurn Industries, Inc., Energy Division, from 1967 to 1995 and has knowledge of the types of products Defendant and its predecessor manufactured, whether those products contained asbestos-containing materials as well as being knowledgeable as to the operation, installation, and repair of Zurn's steam generating products. Mr. Seibel may also testify about the types of trades or crafts which may work and/or be exposed to Defendant's products. He may further testify concerning the extent of Defendant's knowledge of potential asbestos health hazards.

Dr. Irving J. Selikoff, dec., Mount Sinai School of Medicine, 1 Gustave Levy Plaza, New York, New York. Dr. Selikoff will testify by deposition taken in Rogers vs. Johns Manville, February 19, 1971, regarding the relationship between asbestos and disease, knowledge concerning same, state-of-the-art, and all topics reflected in Defendants' deposition designations.

Dr. James Robert Shepherd, III, University of Texas Health Center at Tyler, Department of Radiology, P.O. Box 2003, Tyler, Texas 75710. Dr. Shepherd is a specialist in the area of radiology. He will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof.

Dr. Russell Sherwin, 2011 Zonal Avenue, HMR-201, Los Angeles, California 90033. Dr. Sherwin will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Dr. Sherwin will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Allan Shulkin, Medical City Dallas Hospital, 7777 Forest Lane, Suite 202, Dallas, Texas 75230, (214) 934-1593. Dr. Shulkin is a specialist in the area of respiratory disease. Dr. Shulkin will testify as to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether Plaintiff suffers from asbestos related disease and the basis for such opinion; the Plaintiff's current medical condition and his prognosis in regard to the Plaintiff's medical condition.

Dorsett D. Smith, M.D., 4310 Colby, Suite 201, Everett, Washington 98203. Dr. Smith will testify concerning the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary medicine and epidemiology relevant thereto, cancer issues, e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

James Garland Smith, Jr., M.D., Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P.O. Box 33932, Shreveport, LA 71130-3932. Dr. Smith is a specialist in the area of respiratory diseases. Dr. Smith will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria for asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Smith will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Smith will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. Jessie Steinfield, who will testify concerning government warnings, smoking, and some areas of state-of-the-art.

Dr. Paul M. Stevens, Professor of Medicine, Baylor College of Medicine, Methodist Hospital, Houston, Texas 77030. Dr. Stevens is a specialist in the area of respiratory diseases. Dr. Stevens will testify as to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether Plaintiff

suffers from asbestos related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis in regard to the Plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Gail Stockman, 701 East Marshall, Suite 502, Longview, Texas 75601, (903) 753-0787. Dr. Stockman is a specialist in the area of respiratory diseases. Dr. Stockman will testify as to all matters pertaining to his examination of the plaintiffs(s) and plaintiff's(s') medical records; any communications with the plaintiff's or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos-related diseases; her opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Stockman will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Stockman will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Stockman will testify concerning state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. She may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, she will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, she will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Robert Taylor, M.D., Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P.O. Box 33932, Shreveport, LA 71130-3932. Dr. Taylor is a specialist in the area of respiratory diseases. Dr. Taylor will testify as to all matters pertaining to his examination of the Plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria for asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Taylor

will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Taylor will also testify concerning those areas described for witnesses Demopoulous, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Arthur Judson Tillinghast, M.D., Schumpert Medical Center, 850 Olive Street, Suite A, Shreveport, LA 71104, (318) 222-3662. Dr. Tillinghast will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Dr. Tillinghast will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Kenneth J. Vandevelde, Associate Dean of the Western State University Law School, San Diego, California (619) 297-9700. Dean Vandevelde will testify concerning whether equal treaty rights exist between Canada and the United State of America and related issues.

Dr. J. C. Wagner, Cardiff Wales, United Kingdom. Dr. Wagner will testify concerning the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Hans Weill, Tulane University, School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Weill is a pulmonary disease specialist. Dr. Weill will testify as to all matters pertaining to scientific knowledge, research and study in regards to exposure to asbestos and its effects on the human body; as to the latency periods of asbestos related diseases; as to the various types of asbestos fibers and their effects on the human body; as to the effects of exposure to the chrysotile fiber in regard to asbestos related diseases; scientific criteria used to diagnose respiratory disease, including but not limited to asbestosis, lung cancer, mesothelioma; as to all matters pertaining to the Plaintiff's medical condition; as to all state of the art issues.

Dr. Frank Weir, 8131 Wycomb Drive, Houston, Texas 77070, (713) 995-7532. Dr. Weir is an industrial hygienist who will testify concerning state of the art as it relates to asbestos.

William Weiss, M.D., c/o Hahnemann Medical College, Philadelphia General Hospital, Philadelphia, Pennsylvania. Dr. Weiss will testify concerning the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general pulmonary radiology and/or ILO interpretation of x-rays. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Irma West, M.D., 8428 Citadel Way, Sacramento, California. Dr. West was the head of the Bureau of Adult Health for the State of California for many years and will testify via videotape about the state of the art knowledge in the occupational health community from time to time and the medical priorities at those times.

Dr. Thomas Wheeler, 6565 Fannin, Room 228, Houston, Texas 77030. Dr. Wheeler is a pathologist who will testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the respiratory system. He may also testify about his review of Plaintiff's or decedent's medical records and pathology materials and his opinion as to whether Plaintiff or the deceased suffers from an asbestos-related disease and the basis of such opinion.

Dr. Mark Robert Wick, Division of Surgical Pathology, Suite 300, Peters Building, Washington University Medical Center, One Banes Hospital Plaza, St. Louis, MO, 63110 (314) 362-0101. Baylor College of Medicine, One Baylor Plaza, 6565 Fannin, MS 205, Houston, Texas 77030. Dr. Wick is a pathologist. He will testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays, and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the Plaintiff's medical condition; to the effects of exposure to chrysotile fibers on the human body; and to all matters pertaining to the Plaintiff's medical condition.

Norman Wilder, Internal Medicine Associates, Inc., 2841 Debarr Road, No. 50, Anchorage, Alaska 99508, (907) 276-2811. Dr. Wilder will testify concerning the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. R. Keith Wilson, Pueblo Pulmonary Associates, 1925 East Orman, Pueblo, Colorado 81004. Dr. Wilson is a specialist in the area of respiratory diseases; he will testify to all matters pertaining to his examination of the Plaintiff and Plaintiff's medical records; any communications with the Plaintiff or Plaintiff's family; review of x-rays of the Plaintiff; his opinion regarding whether Plaintiff suffers from asbestos-related disease and the basis of such opinion; the Plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances

other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

George W. Wright, M.D., 6405 South Manyon Parkway, Denver, Colorado. Dr. Wright will testify concerning historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary medicine and epidemiology relevant thereto. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Mark Zibilich, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75246 (214) 820-0111. Dr. Zibilich is an expert in the area of radiology. Dr. Zibilich may testify, or his report may be the basis upon which a testifying expert relies, concerning Dr. Zibilich's review of CAT scans and his conclusions regarding same.

If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.

All physicians who examined Plaintiffs and/or treated or have reviewed medical records, reports, x-rays or pathology slides or reports pertaining to Plaintiffs.

Defendant incorporates herein all of the expert witnesses which have been listed or designated by any other party to this litigation, since these lists are being filed simultaneously.

Defendant also reserves the right to use any affidavits, depositions, answers to interrogatories and responses to request for admissions by any other party to this action, whether or not such party is still a party at the time of the trial.

Defendant further reserves the right to call any witnesses who may be necessary for rebuttal testimony.

Any and all sales representatives serving the area(s) where the Plaintiff(s) allege(s) exposure. The sales representative(s) will testify as to sales of certain products in the area(s) where Plaintiff(s) allege exposure.

Representatives of the Defendant who will testify regarding corporate history, corporate policy, records, warnings, manufacture and general practices of Defendant.

Any and all medical experts retained by any other counsel in their role as liaison defense counsel.

(4) For any expert retained by, employed by, or otherwise subject to the control of the responding party, state and/or provide the following information:

(A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and

(B) the expert's current resume and bibliography.

RESPONSE:

Defendant will supplement in response to this Request as necessary pursuant to the Texas Rules of Civil Procedure.

(g) Please identify and/or provide any discoverable indemnity and insurance agreements.

RESPONSE:

Defendant will supplement in response to this Request as necessary pursuant to the Texas Rules of Civil Procedure.

(h) Please identify and/or provide any discoverable settlement agreements.

RESPONSE:

Defendant has not entered into any settlement agreements at this time.

(i) Please identify and/or provide any discoverable witness statements.

RESPONSE:

Defendant does not have any such statements in its possession at this time.

(j) Please identify and/or provide any and all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

RESPONSE:

Not applicable to this Defendant.

(k) Please identify and/or provide any and all medical records and bills obtained by virtue of an authorization furnished by plaintiff(s).

RESPONSE:

Defendant does not have any such documents in its possession at this time. As medical records are ordered, all parties will be given notice of same and an opportunity to request copies of such records.