



18TH JUDICIAL DISTRICT COURT
PARISH OF IBERVILLE
STATE OF LOUISIANA

LORRAINE PEGGY WILLIAMS
VERSUS
MCCARTY CORPORATION, ET AL

SUIT NO.: 39,404
DIVISION "D"

RESPONSE TO REQUEST FOR ADMISSIONS OF FACT
AS TO AUTHENTICITY OF DOCUMENTS

Exxon Corporation ("Exxon") hereby responds to the Request For Admissions Of Fact As To Authenticity Of Documents filed by the plaintiff on or about September 27, 1991.

REQUEST FOR ADMISSION NO. 1

The attached copies of documents number 1-46 are authentic.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

Exxon presumes that the request to admit that the documents numbered 1-46 are authentic is a request that Exxon admit that those documents are accurate copies of the originals and are what they purport to be. Based on that understanding and presumption, Exxon states that it has reviewed the documents numbered 1-46. Exxon states that it cannot find these documents within any of the files which are in its possession and which are company records. Exxon further states that the documents numbered 1-46 were received by Exxon, not from Mr. Venable or from any of Exxon's present or former employees, but were received by Exxon from counsel for the plaintiff in this and other proceedings against Exxon. Exxon has investigated the circumstances under which these documents came into the possession of plaintiffs' counsel and believes, based on that investigation, that these documents were in some manner produced by Fred S. Venable, formerly an industrial hygienist in Exxon's employ, at a

deposition taken after Mr. Venable's employment with Exxon had ceased. Because Exxon has been unable to find any originals of these documents, whether in its files or elsewhere, Exxon is unable to admit or deny the authenticity of the documents referred to as 1-46. Exxon further notes that the documents numbered 1-46 are not unaltered, but rather contain some handwritten notations which Exxon is unable to identify and therefore the "authenticity" of which Exxon is unable to admit or deny.

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, October 22, 1991.



Gary A. Bezet