

NO. 96-04855-A

MANUEL RUIZ, et al.	§	IN THE DISTRICT COURT OF
	§	
Plaintiffs,	§	
	§	
V.	§	NUECES COUNTY, TEXAS
	§	
OWENS CORNING (a/k/a OWENS	§	
CORNING CORPORATION), et al.,	§	
	§	
Defendants.	§	28TH JUDICIAL DISTRICT

**DEFENDANTS CNA HOLDINGS, INC.
AND CELANESE LTD.'S FIRST
SUPPLEMENTAL RULE 194 DISCLOSURES**

In accordance with Rule 194 of the Texas Rules of Civil Procedure, and as a supplement to Plaintiffs' Request for Disclosure, Defendants CNA Holdings, Inc. and Celanese Ltd. provide the following:

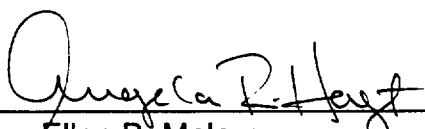
- (a) CNA Holdings, Inc. (f/k/a HNA Holdings, Inc.); Celanese Ltd. (collectively "Celanese").
- (c) Celanese owed no duty, legal or otherwise, to plaintiff and is therefore not liable for any of plaintiff's alleged injuries or damages.
- (e) See Defendants' Designation of Trial Witnesses and Exhibit A thereto, which was served on plaintiff on May 12, 2000.
- (f) See Defendants' Designation of Expert Witnesses and attachments thereto, served on plaintiff on May 12, 2000. Defendants' medical experts have been or will be provided with the items referenced below in (k) and all chest x-rays, pft results, and/or IME reports available or to be available on plaintiff.
- (k) Celanese is in possession of various medical records of plaintiff Rene Rolando Ruiz by virtue of authorizations furnished by him. Please see the lists of those records below. Because the records are voluminous, they are not being produced herewith. The records are available, however, for

inspection and copying during regular business hours at the offices of Kasowitz, Benson, Torres & Friedman LLP, 700 Louisiana, Suite 2200, Houston, Texas 77002.

1. Records from Pulmonary & Critical Care Consultants of Austin (Drs. Frank Mazza and Paul Harford)
2. Records from Spohn Shoreline Hospital (No records deposition)
3. Records from Braselton Construction Co. (No records deposition)
4. Records from Fairbairn Electric, Inc. (No records deposition)
5. Records from Mundy Industrial Maintenance Inc.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: 
Ellen B. Malow
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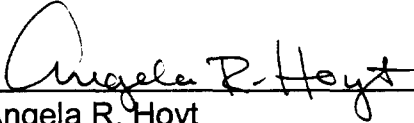
ATTORNEYS FOR DEFENDANTS
CNA HOLDINGS, INC. AND
CELANESE LTD.

OF COUNSEL:

Marc E. Kasowitz
Hector Torres
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via facsimile and/or hand delivery and/or U.S. mail, postage prepaid, to all counsel of record on this 12th day of May, 2000.


Angela R. Hoyt

NO. 96-04855-A

MANUEL RUIZ, ET AL.,

Plaintiffs,

V.

OWENS CORNING FIBERGLAS
CORPORATION, ET AL.,

Defendants.

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IN THE DISTRICT COURT OF

NUECES COUNTY, T E X A S

28TH JUDICIAL DISTRICT

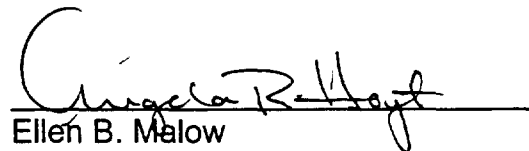
**DEFENDANTS CNA HOLDINGS, INC. AND
CELANESE LTD.'S CERTIFICATE OF DISCOVERY**

I, Angela R. Hoyt, counsel for Defendants, CNA Holdings, Inc. (f/k/a HNA Holdings, Inc. f/k/a Hoechst Celanese Corporation) and Celanese Ltd., certify that on this the 12th day of May, 2000, I served the following discovery by certified mail, return receipt requested, on the respective attorneys of record for Plaintiff, Rene Rolando Ruiz:

- (1) Defendants CNA Holdings, Inc. and Celanese Ltd.'s Designation of Expert Witnesses, Fact Witnesses and Trial Exhibits; and
- (2) Defendants CNA Holdings, Inc. and Celanese Ltd.'s First Supplemental Rule 194 Disclosures.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP



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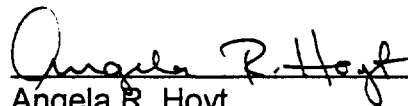
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Angela R. Hoyt