PLAINTIFF'S
EXHIBIT
DUP-2382

CAUSE NO. 90G2055

WELDON R. MOAKE AND JANICE I. MOAKE, ET AL.	§	IN THE DISTRICT COURT
VS.	§	BRAZORIA COUNTY, TEXAS
OWENS-CORNING FIBERGLAS CORPORATION (A/K/A OWENS CORNING CORPORATION), ET AL.	§	239TH JUDICIAL DISTRICT

E. I. DUPONT DE NEMOURS AND COMPANY'S
FIRST SUPPLEMENTAL DESIGNATION OF EXPERTS

TO: WELDON R. MOAKE, by and through his attorneys, Holly Huart and Stephanie Finch, whose address is Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

Pursuant to the Texas Rules of Civil Procedure, E. I. du Pont de Nemours and Company makes the following First Supplemental Expert Designations:

1. **Morton Corn, Ph.D.**
Department of Environmental Health Sciences
The Johns Hopkins University
615 North Wolfe Street, Room 6010
Baltimore, Maryland 21205
(410) 955-3602
(410) 955-9334 facsimile

Dr. Morton Corn is a professor emeritus with the Johns Hopkins University's Department of Environmental Health Sciences in Baltimore. He is currently Director, National Institute of Occupational Safety and Health (NIOSH) Educational Resource Center in Occupational Safety and Health for Training Physicians, Nurses, Hygienists and Safety Professionals, and Director, Division of Environmental Health Engineering.

Dr. Corn is an industrial hygienist with long-standing experience in addressing asbestos-related issues from the perspective of an industrial hygienist and government regulator. He received his Ph.D. degree in Industrial Hygiene and Sanitary Engineering from Harvard University's Division of Engineering and Applied Physics in 1961. He served as Assistant Secretary of Labor for the Occupational Safety and Health Administration ("OSHA") from 1975 to 1977 during the Ford Administration.

Dr. Corn may testify concerning the following subjects: (a) the uses and characteristics of asbestos and asbestos-containing products; (b) the development of industrial hygiene and occupational safety and health in the United States; (c) the evolution of knowledge in the industrial hygiene community concerning the potential health hazards associated with exposure to dust and asbestos; (d) the characteristics of asbestos dust and fibers and measurements of airborne concentrations of asbestos dust and fibers; (e) standards, guidelines, procedures and practices relating to the control of potential exposure to dust and asbestos dust; (f) standards, laws, rules and regulations of OSHA and effect of OSHA standards, laws, rules and regulations; (g) exposure assessment and associated exposures for non-asbestos workers and the general public; (h) DuPont's industrial hygiene practices and procedures; and (i) DuPont's practices, programs and procedures for the health and safety of its employees. Dr. Corn is expected to address these subjects in a general context, and also as they relate to DuPont. Dr. Corn is expected to discuss the specific factual allegations by plaintiffs regarding conditions, procedures, and practices at DuPont. Dr. Corn's testimony is based upon (1) his extensive experience and training in the fields of industrial hygiene and occupational health and safety, (2) knowledge of relevant literature, (3) review of documents, discovery, and testimony regarding plaintiff's allegations, (4) review of relevant DuPont documents; and (5) review of the record in this case.

2. **Richard J. Lee, Ph.D.**
RJ Lee Group
350 Hochberg Road
Monroeville, Pennsylvania 15146
(724)325-1776

Dr. Richard J. Lee is President of the RJ Lee Group, Inc., a consulting firm and analytic laboratory in Pittsburgh. Prior to his affiliation with the RJ Lee Group, Dr. Lee was head of the U.S. Steel Technical Center's Electron Microscopy and Surface Analysis Section for 12 years. He is a theoretical physicist by training, and received his Ph.D. degree from Colorado State University. Dr. Lee was a member of the Health Effects Institute's Literature Review Panel on Asbestos in Buildings, commissioned by Congress. He has also performed work for the EPA and served on various EPA panels and committees regarding asbestos issues. He has also performed investigations of naturally occurring asbestos and other minerals and methods for detection and identification of such minerals. This has included analysis of bulk, air, water, soil and dust samples.

The subject matters on which Dr. Lee may testify include: (a) the history of the guidelines and standards governing exposure to asbestos; (b) the development of scientific knowledge regarding the measurement of asbestos in the air; (c) the aerodynamics of fibers; (d) exposure levels of various activities in the workplace and in public, commercial and private residences including relevant DuPont facilities; (e) analysis and production of bodies of air sampling data for the Environmental Protection Agency and other governmental and private entities regarding naturally occurring forms of asbestos in the environment; and (f) the results of experiments conducted by himself and others.

Dr. Lee is expected to testify based on (1) his extensive experience and training, (2) knowledge of relevant literature and data, (3) review of documents, discovery, and testimony regarding the plaintiffs' allegations, (4) review of relevant DuPont documents, and (5) review of the record in this case.

3. **James M. Crapo, M.D.**
Chairman, Department of Medicine
National Jewish Medical and Research Center
1400 Jackson Street
Denver, Colorado 80206
(303)398-1436

Dr. Crapo is a physician specializing in pulmonary medicine. He is Chairman of the Department of Medicine at the National Jewish Medical and Research Center in Denver, Colorado. He is a former Professor of Medicine and Professor of Experimental Pathology at Duke University Medical Center. Dr. Crapo has carried out extensive research into the mechanisms of pulmonary disease resulting from the inhalation of particulates, including the processes associated with asbestos-related disease.

Dr. Crapo is expected to testify generally about the reactions of the lungs to inhaled particulates and foreign substances in both industrial and non-industrial environments. Dr. Crapo is expected to discuss, in particular, the biological effects of exposure to asbestos dust, and the etiology of asbestos-related disease. Dr. Crapo is expected to testify that the risk of asbestos-related lung disease is related to dose, and will provide his opinions regarding the levels of asbestos exposure necessary to produce disease. He may also testify concerning his asbestos-related studies and publications as well as other literature and studies related to asbestos-related diseases.

Dr. Crapo may also review the x-rays and other medical records of Mr. Moake and render opinions regarding the presence or absence of asbestos-related abnormalities in Mr. Moake's lungs. Dr. Crapo is expected to describe the diagnostic criteria and methods used in the diagnosis of asbestosis, mesothelioma and other asbestos-related conditions. Dr. Crapo may critique the diagnostic reports of the plaintiffs' experts as they relate to plaintiffs' alleged conditions. Dr. Crapo may render opinions regarding the probable cause or causes of Mr. Moake's condition.

4. **Dr. Bruce W. Karrh**
7 Blackhawk Trail
Savannah, Georgia 31411
(912) 598-8992

Dr. Bruce W. Karrh was the Vice President for Integrated Health Care for DuPont from 1993 until 1996 when he retired. Dr. Karrh received a Bachelor of Science degree in Chemistry from the University of Alabama at Tuscaloosa in 1958 and a Medical degree from the Medical College of

Alabama in Birmingham in 1962. He entered the United States Army and performed a rotating internship in 1963 at Brooke General Hospital, Fort Sam Houston, Texas. From 1963 to 1965, Dr. Karrh was a flight surgeon in the U.S. Army medical corps, and from 1965 to 1970, he was in private practice in Athens, Alabama. In 1970, Dr. Karrh became the Medical Supervisor for DuPont's Spruance Plant where he remained until 1973. At that time he became the Research Manager of the Environmental Sciences Group at Haskell Laboratory until 1974. DuPont then appointed Dr. Karrh Assistant Medical Director and then Medical Director in 1977. In 1983, Dr. Karrh was named General Director, Medical, Safety and Fire Protection for DuPont. He was then named Vice President for Safety, Health and Environmental Affairs in 1984 - a position he held until 1993.

Dr. Karrh was a long-standing DuPont employee experienced in addressing health and safety-related topics and issues at DuPont. As part of his duties at DuPont, Dr. Karrh gained knowledge, both historical and current, regarding DuPont's history of and practices regarding safety throughout the company. In the course of his duties, Dr. Karrh became familiar with the history of and practices regarding DuPont's approach to workers' safety and health issues involving exposure to dust and asbestos dust. Much of Dr. Karrh's testimony will be fact testimony; however, he may express opinions in some areas that may be considered expert opinions. Out of an abundance of caution, DuPont is designating Dr. Karrh as an expert because he may be asked to provide such opinions.

Dr. Karrh may testify concerning the following subjects: (a) DuPont's history of providing for health and safety of its employees; (b) policies, procedures and programs for the health and safety of workers including those addressing dust and asbestos dust; (c) medical screening, monitoring and surveillance of DuPont employees; and (d) evolution and understanding of potential health hazards posed by exposures of workers to dust and asbestos dust.

5. **John E. Craighead, M.D.**
IBC, Inc.
P.O. Box 1081
Champlain Station
Burlington, Vermont 05400
(802) 425-3480
Fax (802) 425-3409

Dr. Craighead is a medical doctor who may testify concerning the following subjects: (a) medical state of the art; (b) overview of the history of asbestos utilization in this country for industrial purposes; (c) evolution and developing concepts regarding the role of asbestos in the causation of disease; (d) development of the disease asbestosis and the clinical and pathological presentations of that disease; (e) historical perspective of asbestosis as a disease process; (f) the synergistic effect of cigarette smoking and exposure to asbestos in the disease process; (g) pulmonary abnormalities in workers due to cigarette smoking; (h) characteristics of exposure to asbestos as it applies to the disease lung cancer; (i) studies showing that asbestos is and was not a contributor of lung cancer; (j) synergistic effect of cigarette smoking and asbestos that is now well

established in medical literature as it relates to cigarette enhancing effects of exposure to asbestos; (k) promoter concept of carcinogenesis with regard to lung cancer and asbestos exposure; (l) asbestosis as a marker of heavy and prolonged exposure to asbestos; (m) the clinical and pathological presentation of mesothelioma; (n) medical state of the art review of epidemiological studies of individuals exposed to specific types of asbestos fibers; and (o) the latency period for the disease mesothelioma.

6. **Mark R. Wick, M.D.**
University of Virginia Health System
Pathology Department
301 Peacock Drive
Charlottesville, VA 22903

Dr. Wick may testify, live or by deposition, regarding his opinions relating to the merits of Plaintiff's claims and the defenses offered by Defendants, including opinions on liability, damages, and causation issues in this case. The witness is expected to testify that any asbestos exposure of Plaintiffs allegedly attributable to Defendant was not the cause, nor did it contribute to cause Plaintiffs' alleged injuries. The witness may testify that some other exposures to asbestos at other plants, was the cause of the cancer, injuries, damages and death alleged herein. The witness may gather facts, conduct research and perform tests in formulating opinions regarding causation in this case. The witness will need to gather additional facts before being able to formulate his final opinions and impressions on these several issues. He will testify regarding pathology, the effect of asbestos on human and the relationship of alleged asbestos exposure to disease generally and particularly how the exposures alleged in this case may have been the medical and/or legal cause of the injuries, damages and death alleged by Plaintiff. He may further testify about his review of the medical records, pathology and/or work history of Plaintiffs and Plaintiffs' medical condition, and the cause of Plaintiff's medical condition. His testimony may also include discussion of asbestos and its effect on human health generally and Plaintiff's specifically, and the effect that other substances have on human health generally and Plaintiff's condition specifically. He may also testify regarding the medical conditions of each Plaintiff based on review of medical records, x-rays, Plaintiff's experts' reports and supplemental reports and his training, experience and other special expertise. Further, he may testify concerning the increased risk, if any, of cancer faced by asbestos exposed workers and the prognosis of such individuals. He may testify as to any other matter raised by experts called by Plaintiffs, any co-Defendants, or any other matter which he may be so qualified to testify.

7. **Dr. James Robb**
Cedars Medical Center
1400 Northwest Avenue
Miami, Florida 33136
305-325-5587

Dr. Robb is plaintiff's expert and was deposed on September 25, 2000.

Additional Expert Designations

8. It is anticipated that a radiologist with specialized training and experience in "B" Readings will be necessary to review, interpret and render opinions regarding x-rays of Mr. Moake. This expert is expected to testify generally about presentations seen on x-rays and to explain the presentation that is seen. It is also anticipated that this expert would testify specifically about the findings seen on Mr. Moake's x-ray films and is anticipated to render an opinion regarding the absence or presence of the findings of any asbestos-related condition of the lung.

9. It is further anticipated that a pulmonologist will be designated to discuss the physical condition of Mr. Moake's disease process and also to discuss Mr. Moake's medical records. This expert is also expected to discuss the anatomy and function of the respiratory system in the human body. This expert is expected to discuss the nature of asbestos, the symptomatology, disease process and diagnosis of asbestosis and cancers associated with the respiratory and related systems. It is also anticipated that this expert will testify regarding the methods of diagnosis of alleged asbestos- related diseases as compared to other non-asbestos related diseases. It is anticipated that this expert will also discuss historical and/or medical literature pertaining to asbestos-related conditions and other diseases of the respiratory and related systems.

10. It is anticipated that a construction expert will be designated to discuss the construction of structures on DuPont's plant sites. This expert is expected to testify generally about construction practices and specifically about the relationship of construction contractors and DuPont's plant sites. It is anticipated that this expert will testify regarding control of the construction project site, usage of asbestos, precautions taken and the relationship between contractors and DuPont.

10. To the extent any experts designated by other parties are allowed to testify at the trial in this matter, DuPont hereby cross designates all experts listed by all parties.

11. The following are listed by Plaintiff WELDON MOAKE as treating physicians or health care facilities where he sought treatment. To the extent any of these physicians or representatives of health care facilities are listed by Plaintiff WELDON MOAKE as experts or fact witnesses, DuPont reserves the right to call them as witnesses and to elicit opinions from them.

Dr. Keil
Corpus Christi, Texas

Dr. M. H. Blaine
3314 South America
Corpus Christi, Texas

Dr. Fred B. Brackett
613 Elizabeth, Suite 612
Corpus Christi, Texas 78404

Dr. Donald L. Iden
4521 South Staples
Corpus Christi, Texas 78411

Dr. David Garza
Corpus Christi, Texas

Dr. Charles Hedberg (Deceased)
Corpus Christi, Texas

Dr. John Richard Porter
612 Elizabeth Street
Corpus Christi, Texas 78404

Dr. Paul W. Heath
1521 South Staples, Suite 704
Corpus Christi, Texas 78404

Dr. Sergio Tavares
612 Elizabeth Street, Suite 302
Corpus Christi, Texas 78404

Dr. Daniel Jackson (Deceased)
Houston, Texas

Dr. John R. Kelsey, Jr.
Kelsey-Seabold Clinic West
1111 Augusta Drive
Houston, Texas

Dr. Bobby Chu

1001 Cross Timbers, Suite 1250
Flower Mound, Texas 75028

Dr. David C. May
614 Edmonds Lane, Suite 101
Lewisville, Texas 75067

Dr. Glenn Genevese
651 Cross Timbers, Suite 104
Flower Mound, Texas 75028

Dr. Dennis Costa
475 West Elm, Suite 101
Lewisville, Texas 75057

Dr. Lyle Brown
Denton, Texas

Dr. Dong Moon Shin
1515 Holcombe Boulevard
Houston, Texas 77030

Dr. Garrett L. Walsh
1515 Holcombe Boulevard
Houston, Texas 77030

Dr. Donald E. Schwarz
Presbyterian Hospital of Dallas
8200 Walnut Hill Lane
Dallas, Texas 75231

Dr. Clark Byroad
575 North Valley Parkway, Suite 100
Lewisville, Texas 75067

Dr. Katherine Pisters
1515 Holcombe Boulevard
Houston, Texas 77030

Dr. Reuben
Lewisville, Texas

Dr. Goldberg
Lewisville, Texas

U. S. Army Hospital
Frankfurt, Germany

Spohn Memorial Hospital
2606 Hospital Boulevard
Corpus Christi, Texas 78405

St. Luke's Episcopal Hospital
6720 Bertner Avenue
Houston, Texas 77030

University of Texas M. D. Anderson Cancer Center
1515 Holcombe Boulevard, Box 506
Houston, Texas 77030

Medical Center of Lewisville
500 West Main
Lewisville, Texas 75057

Larry E. Cotten by S. Jan Hueber

Larry E. Cotten
State Bar No. 04861600
Dennis M. Conrad
State Bar No. 04706400
S. Jan Hueber
State Bar No. 20331150

Kirkley Schmidt & Cotten, L.L.P.
2700 City Center II
301 Commerce Street
Fort Worth, Texas 76102-4127
(817) 338-4500
(817) 335-4599 Fax

Attorneys for Defendant
E. I. du Pont de Nemours and Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served on Plaintiffs' counsel by certified mail, return receipt requested, and a copy of the above was served on all other known counsel by regular U.S. mail on this the 29th day of September, 2000.

Counsel