

NO. 99-5894-K

|                                  |   |                                     |
|----------------------------------|---|-------------------------------------|
| JOHNNY FRANKLIN GIFFORD, et al., | § | IN THE DISTRICT COURT               |
|                                  | § |                                     |
| Plaintiffs,                      | § |                                     |
|                                  | § |                                     |
| v.                               | § | DALLAS COUNTY, TEXAS                |
|                                  | § |                                     |
| OWENS CORNING (a/k/a OWENS       | § |                                     |
| CORNING CORPORATION), et al.,    | § |                                     |
|                                  | § |                                     |
| Defendants.                      | § | 192 <sup>nd</sup> JUDICIAL DISTRICT |

**DEFENDANT REYNOLDS METALS COMPANY'S SUPPLEMENTAL RESPONSES  
TO PLAINTIFFS' RULE 194 REQUESTS FOR DISCLOSURE**

Defendant Reynolds Metals Company ("Reynolds"), by counsel, pursuant to Rule 194 of the Texas Rules of Civil Procedure, responds as follows to Plaintiffs' Requests for Disclosure:

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

As of the time of Reynolds' initial Rule 194 Response, Plaintiff's counsel had represented that Plaintiff Ricardo Silva had worked at Reynolds' San Patricio facility.

This supplemental response is provided in light of Mr. Silva's subsequent testimony at deposition on June 25, 2001 that he had worked at Reynolds' Sherwin plant.

Investigation and discovery is ongoing in this matter, and, at this time, Reynolds does not know each and every individual who has knowledge of the relevant facts, nor does

Reynolds know at this time whom it may call to testify at the trial of this matter.

Reynolds therefore reserves the right to supplement its response to this Request in accordance with Rule 193 of the Texas Rules of Civil Procedure. At this time, Reynolds

identifies the following additional individuals who may have knowledge of relevant facts and who Reynolds may call to testify at the trial of this matter:

5) **Reynolds Personnel/Witnesses**

(a) **Sherwin Alumina Plant Personnel.** Reynolds may call some or all of the following individuals who were employed at various times at the Sherwin Alumina Plant to testify as to their personal knowledge concerning plant operations and plant conditions; the use of asbestos-containing products in plant operations; the elimination and abatement of asbestos; Reynolds' safety procedures, both in general and as they relate to asbestos (including the use of respirators); and, other matters relevant to plaintiff's claims and/or Reynolds' defenses:

**Dr. John Frandolig  
RR 1, Box 358  
Lake Geneva, WI 53147**

Dr. Frandolig was the Sherwin Alumina Plant Medical Director from 1989-91. He may be called to testify about his knowledge regarding Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures.

**Dr. Guy Racette  
8122 Deck Street  
Corpus Christi, TX 78412**

Dr. Racette was the Sherwin Alumina Plant Medical Director from 1991-93. He may be called to testify about his knowledge regarding Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures.

**Dr. Wendell Roberts  
620 West Johnson Avenue  
Arkansas Pass, TX**

Dr. Roberts is the current Sherwin Alumina Plant physician. He may be called to testify about his knowledge regarding Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

**Deloris Ulke  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Ms. Ulke was the Head Nurse at Sherwin Alumina Plant Medical Department. She may be called to testify about her knowledge about Reynolds' attitude toward employee health in general, as well as general information regarding the Medical Department at the Sherwin Alumina Plant. She may also be called to testify about her knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

**C. Arlon Boatman  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Boatman is the Health & Safety Manager for the Sherwin Alumina Plant who may be called to testify about his knowledge of Reynolds' safety procedures and the use of asbestos-containing products at the Sherwin Alumina Plant, as well as other information. He may also be called to testify about the operation of the Sherwin Alumina Plant Medical Department, including the Respiratory Surveillance Program. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

**Terry N. Roubidoux  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Roubidoux was the Safety Coordinator for the Sherwin Alumina Plant from 1992-June 1997. He is currently the Production Manager the Sherwin Alumina Plant. He may be called to testify about his knowledge of the Sherwin plant, its operations, safety procedures and the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information. He may also be called to testify about his knowledge related to asbestos exposure procedures and other matters relevant to plaintiff's claims and/or Reynolds' defenses.

**A.S. "Stan" Millsap  
5541 Bear Lane, Ste. 236  
Corpus Christi, TX 78405**

Mr. Millsap was the Safety Coordinator at the Sherwin Alumina Plant. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

**Darrell L. Lentz  
2406 West Frank Street  
Apartment 114  
Lufkin, Texas  
(409) 632-9345**

Mr. Lentz was the Safety Director at the Sherwin Alumina Plant from 1977-November 1982. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

**Ernest L. Sweet  
114 Glenwood Drive  
Liverpool, New York 13090  
(315) 652-6543**

Mr. Sweet was the Superintendent for Environmental Health and Safety from 1980- October 1985. He may be called to testify about his knowledge regarding respirator use at the Sherwin Alumina Plant, regarding OSHA and MSHA requirements and the implementation of the requirements at the Sherwin Alumina Plant, as well as information related to other safety procedures. He may also be called to testify about his knowledge regarding the responsibilities of the Safety Department as they relate to asbestos at the Sherwin Alumina Plant, safety meetings that were conducted and employee training. He may further be called to testify about his knowledge of asbestos abatement at the Sherwin Alumina Plant.

**William E. Hamblin**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Hamblin was a Senior Maintenance Engineer at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Lou Suffredini**  
**Austin, Texas**

Mr. Suffredini was the Plant Manager of the Sherwin Alumina Plant. He was employed at the Sherwin Alumina Plant from the early 1950s-1977. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Timothy D. Woods**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Woods is the Plant Controller at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Frank Strickland**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Strickland is the Purchasing Manager for Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**D. T. Greeson  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Greeson is a Purchasing Agent for Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**James C. Tiffany  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Tiffany was the Plant Engineer at the Sherwin Alumina Plant from approximately 1973-76 and was a General Engineer, Maintenance Superintendent, and Senior Engineer for various periods from 1964-73 and 1985 to the present. He may be called to testify about his knowledge of the use of products that contained asbestos, the elimination of some asbestos-containing products, and asbestos abatement. He may also be called to testify about his knowledge of Reynolds' safety procedures, and use of safety equipment at the Sherwin Alumina Plant, as well as other information.

**Jack C. Oates  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Oates was the Plant Engineer at the Sherwin Alumina Plant from 1980-84 and was Maintenance Engineer, Project Engineer, and Project Manager for various periods between 1967-74 and 1977-91. He is currently the Senior Engineering Supervisor at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant.

**Howard Grote  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Grote has been Project Engineer and Maintenance Engineer for various periods of time between 1970 and the present. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant.

**Ed Peterson**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Peterson has been in the Engineering Department at Reynolds' Sherwin Plant since 1973. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant.

**Paul Matula**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Matula is a Designer in the Engineering Department of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Mario Rivera**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Rivera was a maintenance supervisor in Area 50 of Sherwin Alumina Plant. He is currently in the Industrial Hygiene Department of the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Charles Chapman**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Chapman was a maintenance supervisor in Area 50 of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures,

safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Jeffrey Downs**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Downs is the current maintenance supervisor in Area 50 of Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Gary Cedotal**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Cedotal was the maintenance supervisor for Areas IV and V of the Sherwin Alumina Plant from 1989-93. He is currently the Shift Maintenance Supervisor. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Ernest Coulter**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Coulter was the Maintenance Supervisor and General Foreman in the Maintenance Department at the Sherwin Alumina Plant from 1963-90. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Ludwig Jahn**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Jahn has been the Maintenance Supervisor in the Maintenance Department at the Sherwin Alumina Plant since 1989. Prior to this position, Mr. Jahn held numerous jobs in the Maintenance Department in the 1970s. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Hector De La Garza**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. De La Garza is in the Environmental Department of the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Adan J. Villarreal**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Villarreal is a Cost Accountant at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Lester Charles Homan**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Homan is a Senior Accountant at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Ernest Boulware**  
**215 Seco**  
**Portland, TX 78374**

Mr. Boulware is a retired carpenter, laborer and maintenance mechanic from the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Frank Hall, Jr.**  
**401 Rabbit Run Road**  
**Arkansas Pass, TX 78336**

Mr. Hall is a building and trade mechanic, employed with the Sherwin Alumina Plant since the late 1950s. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Weldon Hesseltine**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Hesseltine is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1955. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Leroy Rhoads**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Rhoads is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1969. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, the involvement of the Union in safety matters at the Sherwin Alumina Plant, as well as other information.

**Howard Cave  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Cave is a member of the Maintenance Department at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Ronald Hesseltine  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Hesseltine is a supervisor, employed with the Sherwin Alumina Plant. He worked as an hourly equipment cleaner from 1965-88. He was promoted to supervisor in 1988 and worked as a supervisor in Areas IV and V from 1994-96. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Jimmie Lehman  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Lehman is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Howard Bittel  
Sherwin Alumina Plant  
P.O. Box 9911  
Highway 361  
Gregory, TX 78469**

Mr. Bittel is a building and trade mechanic, employed with the Sherwin Alumina Plant since 1987. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Chuck Coulter**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Coulter is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Willie Enriquez**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Enriquez is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Mike Gonzales, Jr.**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Gonzales is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**A. Littlejohn**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Littlejohn is a building and trade mechanic, employed with the Sherwin Alumina Plant. He may be called to testify concerning his knowledge of the work environment, Reynolds' safety procedures, the use of products which contained asbestos, and the abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Tony Dunn**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, TX 78469**

Mr. Dunn was the Process Engineer at the Sherwin Alumina Plant from 1963-70 and was Technical Manager and Superintendent, and Operating Superintendent for various periods between 1974-76 and 1978-95. He is currently the Training Manager at the Sherwin Alumina Plant. He may be called to testify about his knowledge of Reynolds' safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Glyn Reynolds**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, Texas 78469**

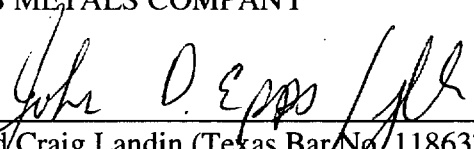
Mr. Reynolds was an Area General Supervisor at the Sherwin Alumina Plant from 1974-80 and 1984-88. He is currently a Master Planner at the Sherwin Alumina Plant. He may be called to testify about his knowledge of the Sherwin plant, its operations, safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

**Wayne Haley**  
**Sherwin Alumina Plant**  
**P.O. Box 9911**  
**Highway 361**  
**Gregory, Texas 78469**

Mr. Haley was a section superintendent at the Sherwin Alumina Plant. He may be called to testify about his knowledge of the Sherwin plant, its operations, safety procedures, safety equipment, the use of products which contained asbestos, and abatement of asbestos at the Sherwin Alumina Plant, as well as other information.

REYNOLDS METALS COMPANY

By: \_\_\_\_\_

  
David Craig Landin (Texas Bar No. 11863720)

John D. Epps (Texas Bar. No. 00796079)

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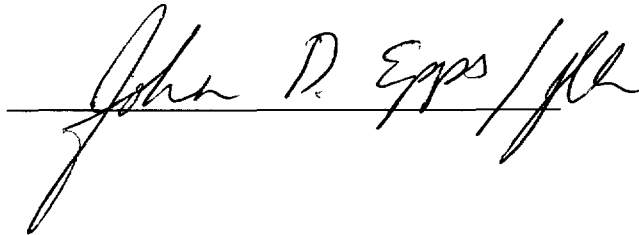
**Attorneys for Reynolds Metals Company**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11 day of July, 2000, a true and correct copy of the above and foregoing instrument is being served by certified mail, return receipt requested, on the following Plaintiffs' counsel:

Scott Frieling  
BARON & BUDD, P.C.  
The Centrum  
Suite 1100  
3102 Oak Lawn Avenue  
Dallas, Texas 75219

All other known counsel of record are given notice of this pleading by facsimile only.

A handwritten signature in cursive script, reading "John D. Epps", followed by a diagonal slash and the initials "JLE". The signature is written over a horizontal line.