PLAINTIFF'S EXHIBIT

AL-1844

NO. 0101021B

WANDA JOE MCREYNOLDS, ET AL,	§	**IN THE DISTRICT COURT**
	§	
Plaintiffs,	§	
	§	
VS.	§	**44TH JUDICIAL DISTRICT**
	§	
U.S. GYPSUM COMPANY, et al.,	§	
	§	
	§	
Defendants.	§	**DALLAS COUNTY, TEXAS**

ALCOA INC.'S DESIGNATION OF EXPERT AND FACT WITNESSES

TO: Plaintiff, Wanda Joe McReynolds, et al, by and through their attorney of record, D. Leeanne Jackson, Baron & Budd, 3102 Ok Lawn Avenue, #1100, Dallas, TX 75219.

COMES NOW, Defendant, Alcoa Inc. (Alcoa) and makes and files this Designation of Expert and Fact Witnesses in the above-entitled and numbered cause, pursuant to the Texas Rules of Civil Procedure.

Respectfully submitted,

By: _____

KENNETH D. MORRIS
State Bar No. 00791303

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ATTORNEYS FOR DEFENDANT
ALCOA INC.,

Of Counsel:
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WALKER, KEELING & CARROLL, L.L.P.
210 E. Constitution
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by hand delivery, telephonic document transfer, certified mail, return receipt requested, or regular mail to all parties on this the 24th day of May, 2001.

KENNETH D. MORRIS

WANDA JOE MCREYNOLDS, ET AL V. U.S. GYPSUM COMPANY, ET AL
Cause No. 0101021B

ATTACHMENT A
LIST OF EXPERT WITNESSES AND LAY WITNESSES

J. LeRoy Balzer, Ph.D
408 Horse Trail Court
Alamo, CA 94507
Phone: 925-274-0826
Fax: 925-274-1413

Dr. Balzer was a Certified Industrial Hygienist from 1973 until 1987 when he became an Assistant Vice Chancellor at the University of California Health Sciences Campus in San Francisco. Dr. Balzer may testify regarding the state of scientific and medical knowledge concerning asbestos during the time periods relevant to this case. Dr. Balzer may give testimony regarding the level of asbestos fiber released in various activities. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. He may testify as to work practices in various types of occupations using products that contained asbestos. He may testify as to the applicability of the Environmental Protection Agency and OSHA guidelines as they relate to various types of occupations.

Dr. Balzer's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a site visit to Alcoa's Point Comfort Operations, and a review of the documents produced by the parties during discovery.

Lawrence W. Birkner
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, CA 91362-1822
Phone: 805-494-8173

Mr. Birkner is an experienced certified industrial hygienist with extensive background in the prevention of adverse health effects and injuries in the workplace by evaluating the workplace for potential hazards with regard to work practices and workplace design; measuring and evaluating various substances to assess exposure, exposure potential and health and safety risks; and controlling the occupational setting with engineering, work practice, administrative, and personal protective equipment methods. Mr. Birkner may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and in particular the evolution of knowledge regarding the effects of asbestos exposure and its control during the period relevant to this case. He may also testify as to the development and utility of methodologies identifying and measuring asbestos in air, dust and products, and the process of setting threshold limit values ("TLVS") and other levels for asbestos exposure. He may also testify regarding the evolution of various standards for exposure to asbestos, including Threshold Limit Values and OSHA Permissible Exposure Limits.

Mr. Birkner may discuss the relationship between scientific knowledge and the development of public policy and the standards relating to asbestos exposure, and all aspects of government

regulation of asbestos exposure. Mr. Birkner may discuss historic literature regarding asbestos exposure and its health consequences, and recommended methods for controlling those consequences. Mr. Birkner may discuss the conditions and circumstances necessary to give rise to asbestos-related disease, as reflected in the historic literature, including the nature of the exposure, fiber type involved, duration of exposure, intensity of exposure and job categories. He may also testify industrial hygiene relating to asbestos, including, but not limited to asbestos containing products used in manufacturing facilities, construction sites, and assessment of risk of exposure under various circumstances. Mr. Birkner may also testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters including knowledge about asbestos- related disease among aluminum workers.

Mr. Birkner may also testify about the development of the internal knowledge of ALCOA regarding exposure to asbestos, including but not limited to what was known and knowable regarding the health effects of exposure to asbestos, the knowledge available to the industry and the advice being given by industrial hygienists in the field, potential risks of exposure to asbestos, how to address those risks in various occupational settings, and finally the development of information regarding finished products and their application in field settings. Mr. Birkner may testify about the approaches generally and by ALCOA in particular for controlling the risks arising from exposure to asbestos and asbestos-containing products in occupational settings, including but not limited to work practices, engineering controls, warnings and labeling.

Mr. Birkner may comment about testing done by or on behalf of the Plaintiffs, including critique and analysis of the sampling methods and analysis, protocols and scientific basis for the tests, and accuracy of the testing in reproducing field conditions.

Mr. Birkner's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of various documents produced by the parties in discovery, a review of deposition transcripts, and a site inspection of the Alcoa facilities. Mr. Birkner may testify about matters referred to in the designations of Dr. First, Dr. Balzer and Dr. Wier.

Thomas Bonney
2816 Herron Lane
Glenshaw, PA 15116
Phone: 412-487-4877

Mr. Bonney is a retired Alcoa employee. Mr. Bonney began working at Alcoa in 1948 and retired in 1987. Mr. Bonney worked in the Industrial Hygiene department in Pittsburgh. Mr. Bonney is a certified Industrial Hygienist and practiced such profession while an employee of Alcoa. He will express opinions concerning what was known about asbestos related disease in the 1950's, 1960's, 1970's and 1980's and the assumptions made concerning the type of fibers that caused or did not cause disease. Furthermore, he may testify concerning the safety awards and general hygiene practices at Alcoa generally. He will express opinions concerning the implementation of the ACGIH Threshold Limit Value standards and the various governmental regulations. In addition to offering factual testimony, Mr. Bonney may offer specialized or expert testimony. It is anticipated that his

testimony may include "expert testimony," based on his experience, background and training in the field.

Boyd Braniff
114 Cedar Ridge Drive
Rockport, TX 78382-6825
Phone: 512-987-6180

Mr. Braniff is currently employed at Alcoa's Point Comfort, Texas plant as a Remediation Construction Manager. While Mr. Braniff did not begin his employment at Point Comfort until 1997, he began his tenure with Alcoa in 1968. He has worked at several Alcoa facilities in the United States and abroad. He has worked in construction, engineering, procurement, and was involved in smelter expansion efforts abroad.

Mr. Braniff may offer testimony relating to any of his Alcoa positions. Mr. Braniff may offer testimony relating to Alcoa's general polices regarding asbestos removal and Alcoa's efforts to identify substitutes for asbestos-containing materials. Additionally, Mr. Braniff may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jay Bruggeman
336 Raymaley Rd.
Harrison City, PA 15636
Phone: 724-744-0821

Mr. Bruggeman may testify regarding the design of "pots" or "cells" used in Alcoa's smelting operations.

In addition to offering factual testimony, Mr. Bruggeman may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Morton Corn, Ph.D., B.CH.E., CSP
Morton Corn and Associates, Inc.
Environmental Consultants and Engineers, Inc.
3208 Bennett Point Road
Queenstown, MD 21658

Dr. Corn may testify as to matters relating to the standards, customs, practices, and general principles in the field of industrial hygiene; the manner and method of conducting and reporting the results of industrial hygiene surveys; historical development, design, use application, and interpretation of dust counting surveys and air sampling tests; interpretation of dust counting surveys and air sampling tests performed in industrial settings , including paper mills and dryer felt and fabric manufacturing plants; historical development, purpose, meaning application, and maintenance of threshold limit values and permissible exposure limits for asbestos exposure and their application in industrial settings; size, construction, engineering controls, layout, and nature of the plaintiffs' working environment; composition and asbestos content, if any, of the products which the plaintiffs claim exposure, including the ability , if any, of such products to emit respirable asbestos fibers; state of the scientific and medical art throughout history regarding knowledge of asbestos related diseases; estimated duration and intensity of exposure necessary to cause asbestos related diseases; estimated time-weighted average exposure of the plaintiffs to asbestos from various sources; fiber release, fiber drift, the speed with which asbestos fiber settles out of the air and fails to remain airborne, and the speed with which asbestos leaves the breathing zone of individuals; purpose, history and operation of the American Conference of Governmental Hygienists; historical development, design, manufacture, composition, testing, use, operation and maintenance of dryer felts and fabrics; responsibilities of employers, unions, and individual workers regarding industrial hygiene and safety; use and effectiveness of respirators; development of product warnings; and/or documentary evidence relevant to the defense of the individual plaintiff's claims.

It is expected that Professor Corn's testimony generally will respond, within the scope of his expertise, to the subject matter of industrial hygiene testimony that may be offered by Plaintiff's experts, and in that sense his testimony is dependent upon the prior testimony of such experts and cannot be predicted with further specificity.

Dr. Corn's testimony will be based on his training, experience, research, education, writings, review of medical and scientific literature concerning asbestos disease and other relevant matters, and review of depositions, documents, and medical records relevant to the plaintiffs.

John E. Craighead, M.D.
1845 Four Winds Road
Ferrisburgh, VT 05406
Phone: 802-425-3480

Dr. Craighead is a pathologist.

Upon review of Plaintiffs' medical records and pathology materials, Dr. Craighead may testify about Plaintiffs' medical condition and its causes. His testimony may include a discussion of asbestos and its effects on human health generally and on the Plaintiffs' condition specifically and

the effect of other substances on human health generally and on the Plaintiffs' condition specifically. Dr. Craighead may testify regarding the increased risk of cancer faced by individuals who smoke cigarettes or other tobacco products and the link between smoking and cancer. Dr. Craighead may testify about the relationship between asbestos exposure and cancer and the methods by which it can be determined whether a particular cancer is related to asbestos exposure. Dr. Craighead may apply these principles to Plaintiffs' case. Dr. Craighead may discuss asbestosis, bronchitis, bronchiolitis, emphysema, peribronchial fibrosis, smokers pigment and Chronic Obstructive Pulmonary Disease, their interaction and their relationship to cancer.

Dr. Craighead may testify as to the state of the art with respect to asbestos in the field of medicine and in particular the evolution of knowledge regarding the effects of asbestos exposure on human health. Dr. Craighead may discuss historical literature regarding asbestos exposure and its health consequences. Dr. Craighead may discuss the conditions and circumstances necessary to give rise to asbestos-related disease as reflected in the historical literature, including the nature of the exposure, the type of fiber or asbestos involved, the duration of exposure, the intensity of the exposure and the job category or classification involved in the exposure. Dr. Craighead may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease and other related matters including current and historic knowledge about asbestos-related disease among aluminum workers.

Dr. Craighead may testify regarding Plaintiffs' diagnosis and symptoms and their relationship, if any, to his alleged exposure to asbestos and/or other substances, including cigarette smoke. Dr. Craighead may discuss the relationship between the time of Plaintiffs' alleged exposure to asbestos and its relationship to the onset of disease. Dr. Craighead may discuss the concept of latency and its applicability to this case.

Dr. Craighead may testify about cigarette smoking and the diseases caused by cigarette smoking generally. Dr. Craighead may testify based on epidemiology studies as to the cause of Plaintiffs' alleged asbestos-related disease.

Dr. Craighead may testify that based on the medical and scientific literature available at the time, Alcoa could not have reasonably known that its particular use of asbestos could be injurious. Dr. Craighead may testify as to his review of the literature and the opinions and conclusions contained in that literature. Dr. Craighead may testify as to his experiences and developing knowledge as a doctor over the years. Dr. Craighead may testify regarding exposure levels to asbestos, at what levels asbestos may cause disease, and when this was known and reflected in the medical and scientific literature.

Dr. Craighead may also testify about the body's biological responses to exposure to asbestos, the pathogenic effects produced by various asbestos fiber types and the levels of exposure necessary for such effects, the levels and circumstances of exposure necessary to produce them and the mechanisms of asbestos induced diseases including fibrosis and carcinogenesis. He may further testify concerning asbestos deposition and elimination from the lungs and body.

Dr. Craighead may testify concerning the fiber types of asbestos generally and the asbestos-related diseases that can be potentially caused by those types and under what circumstances.

Dr. Craighead may testify concerning the various alleged exposures to asbestos encountered by Plaintiffs during his lifetime and the relative probability of those exposures being related to the development of the alleged asbestos-related disease.

Dr. Craighead's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of the various documents produced by the parties in discovery, their pertinent medical records and pathology specimens and records introduced by Plaintiffs as evidence in this case. Dr. Craighead may testify further as to matters described in the designation of Dr. Cagle.

John Cummings
Corporate and Investor Relations
P.O. Box 5108
Denver, CO 80217-5108
Phone: 303-978-4914
Fax: 303-978-2041

Joseph Damiano
134 Laurel Wood Drive
Pittsburgh, PA 15237
Phone: 412-364-0394

Mr. Damiano has served in a number of industrial hygiene positions at Alcoa's Corporate Offices in Pittsburgh since 1979. Mr. Damiano may testify about any of his job positions at Alcoa, Alcoa's use or non-use of asbestos containing materials, and safety precautions advised by Alcoa. In addition to offering factual testimony, Mr. Damiano may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Henry Demopoulos
Health Maintenance Services
7 Westchester Plaza
Elmsford, NY 10523

Dr. Demopoulos may be called to testify about the medical condition of the Plaintiffs; general pathology; the pathology of asbestos-related diseases; and the pathology of the Plaintiffs; the incidence/risk of cancer among various populations. He may testify as to the state of the art with respect to asbestos in the field of medicine and in particular the evolution of knowledge regarding the effects of asbestos exposure on human health. He may discuss historical literature regarding asbestos exposure and its health consequences. Dr. Demopoulos may discuss the conditions and circumstances necessary to give rise to asbestos-related disease as reflected in the historical literature, including the nature of the exposure, the type of fiber or asbestos involved, the duration of exposure, the intensity of the exposure and the job category or classification involved in the exposure. Dr. Demopoulos may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease and other related matters including current and historic knowledge about asbestos-related disease among aluminum workers.

Christine C. Dixon-Ernst
1202 Macon Avenue
Pittsburgh, PA 15218
Phone: 412-553-3612

Ms. Dixon-Ernst is a current Alcoa employee. She began as an Industrial Hygienist in 1979 and has held the position of Senior Consultant in the area of industrial hygiene since 1984.

Ms. Dixon-Ernst may testify based on her experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Alcoa plants generally, by Alcoa's industrial hygienists, and in Alcoa's Safety and Medical Departments.

In addition to offering factual testimony, Ms. Dixon-Ernst may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Wayne Dunlap
Rt. 4, Box 56
Port Lavaca, Texas 77979
Phone: 512-552-9526

Mr. Dunlap is a former Alcoa employee. While employed at Alcoa's Point Comfort, Texas facility, he worked as a foreman in the utility area.

Mr. Dunlap may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Dunlap may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's pot rooms, in Point Comfort's calcination area, and at Alcoa plants with facilities similar to the ones at which he has worked. He may testify about Alcoa's use and substitution of asbestos containing materials, and safety precautions advised by Alcoa.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background, and training in the field.

George Farrah
460 Riverview Drive
New Kensington, PA 15068
Phone: 412-337-8700

Mr. Farrah began his employment with Alcoa in 1940 and retired in approximately 1979. Mr. Farrah held several positions including Chairman of the Environmental Health Lab. Mr. Farrah may testify regarding any of his job positions at Alcoa, and safety precautions advised by Alcoa. In addition to offering factual testimony, Mr. Farrah may offer specialized or expert testimony. It

is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Tom Flores
P.O. Box 3022
Port Lavaca, TX 77979
Phone: 512-552-3080

Mr. Flores is a former Alcoa employee. Mr. Flores was employed at Alcoa's Point Comfort, Texas facility from 1955 until his retirement in 1993. During his tenure, he was employed as a chemical engineering technician, an environmental control technician, an environmental control supervisor, a senior technician-RM&A, and a process model technician.

Mr. Flores may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Flores may testify concerning the location of asbestos-containing materials at the Point Comfort plant, the handling of asbestos-containing materials, and dust sampling. Mr. Flores also may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, by the Environmental Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Ron Flournoy
215 Willowbend
Port Lavaca, Texas 77979
Phone: 512-553-7040

Anna Garrett
885 Evans Road
Yoakum, TX 77995-6766
Phone: 512-293-2782

Ms. Garrett is currently employed at Alcoa's Point Comfort, Texas plant as a secretary in the Maintenance Department. Ms. Garrett began her employment at Alcoa in 1970 at Point Comfort. During her tenure at Point Comfort she has worked in various clerical positions as well as unit supervisors in the Chloralkalai and Natural Gas plants and as a maintenance control specialist.

Ms. Garrett may offer testimony relating to any of her Alcoa positions. Ms. Garrett may testify based on her experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's Chloralkalai and Natural Gas plants, and at Alcoa plants with facilities similar to Point Comfort.

In addition to offering factual testimony, Ms. Garrett may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Dewayne Holmes
Alcoa Point Comfort Operations
State Highway 35
Point Comfort, TX 77978
Phone: 512-987-6180

Mr. Holmes is an Alcoa employee. Mr. Holmes is employed at Alcoa's Point Comfort, Texas facility.

Mr. Holmes may offer testimony relating to the procurement of materials and the involvement of Thorpe Insulation, if any at the Point Comfort, Texas facility.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Carl Hudson
2100 Sager
Rockdale, TX 76567
Phone: 512-446-5495

Mr. Hudson is currently the Director of Personnel at the Alcoa Rockdale facility. He has had various previous assignments throughout Alcoa. He may testify that Alcoa employees were covered under the appropriate Worker's Compensation statute during the relevant time periods. During Mr. Hudson's tenure at Alcoa he has handled safety discussions and may testify concerning the safety awards received by Alcoa Rockdale, Alcoa corporation generally and Alcoa plants throughout the world. Mr. Hudson may testify concerning the safety statistics and the safety record of Alcoa Rockdale as it is compared to other industries both similar and dissimilar in the United States. He will also testify concerning Alcoa's safety program and its influence on the safety environment in Alcoa facilities.

Mr. Hudson may testify concerning Alcoa communications with the union regarding safety issues. Furthermore, he may testify concerning present and past management-union contracts and the labor relations policies and procedures. He may testify further regarding the audit standards employed by Alcoa in the self audits found in the various documents produced by Alcoa.

He will also testify concerning the aluminum smelting process generally. Mr. Hudson is involved with Alcoa management discussions concerning the economic viability of any smelter or other Alcoa facility and the comparison of profitability between that plant and others that exist anywhere in the world. Mr. Hudson may testify as to the economic issues admissible in the punitive damages phase (if any) of the trial. He will discuss expenditures on health and safety yearly at the Alcoa Rockdale plant and similar facilities owned by Alcoa.

Mr. Hudson will further testify to the involvement of Alcoa Rockdale in the community and Alcoa's contribution to charities and other non profit organizations that benefit the citizens in the area.

In addition to offering factual testimony, Mr. Hudson may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Tom Innes
113 Royale Drive
Port Lavaca, TX 779779
Phone: 512-552-3172

Mr. Innes is a former Alcoa employee. Mr. Innes began his employment with Alcoa in 1968 and retired in 1993. He worked at Point Comfort for two years in Smelter Renovation and worked the balance of his years at Point Comfort as a Procurement Manager.

Mr. Innes may offer testimony relating to any of his Alcoa positions. Mr. Innes may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's smelter, in Point Comfort's Procurement Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Katie Johnson
222 Suncrest
Port Lavaca, TX 77979
Phone: (512) 552-2867

Ms. Johnson is a former Alcoa employee. Ms. Johnson was employed at Alcoa's Point Comfort, Texas facility from 1954 until her retirement in 1994. During her tenure, she was employed as a typist, secretary, and stores buyer.

Ms. Johnson may offer testimony relating to any of her Alcoa positions. Ms. Johnson may testify based on her experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, by the Stores and Purchasing Departments, and at Alcoa plants with facilities similar to ones at which she has worked. Mrs. Johnson may testify regarding Alcoa's efforts to locate substitutes for asbestos containing materials.

In addition to offering factual testimony, she may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Norman Jones
Box 212
Ganado, TX 77962
Phone: 512-771-2627

Mr. Jones is a current Alcoa employee. Mr. Jones has been employed at Alcoa's Point Comfort, Texas facility since 1968. He has been employed in the security department since 1969 and also worked in casting, potrooms, civil maintenance, and utilities.

Mr. Jones may offer testimony relating to any of his Alcoa positions. Mr. Jones may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Jerry Karl
P.O. 603
Edan, TX 77957
Phone: 512-782-6418

Mr. Karl is a retired Alcoa employee and began his Alcoa career in 1964. He held a variety of positions including Potroom Line Foreman from 1969-1975, Potroom Technician from 1975-1979 and Potroom Supervisor from 1979-1981. Mr. Karl also worked as a Supervisor in the Paste and Carbon Plans prior to his retirement in 1997.

Mr. Karl may offer testimony relating to any of his Alcoa positions. Mr. Karl may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's pot room, in Point Comfort's Carbon plant, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Kerry Keller
1920 Jackson
Port Lavaca, TX 77979
Phone: 512-552-2351

Mr. Keller is a former Alcoa employee. He began his employment at Alcoa's Point Comfort, Texas plant in 1959 and retired in 1998. During his tenure with Alcoa he was employed as a maintenance supervisor, a general mechanic, a supervisor in safety and clarification, and worked in the Safety & Industrial Hygiene Department.

Mr. Keller may offer testimony relating to any of his Alcoa positions. Mr. Keller may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's Maintenance Department, in Point Comfort's Clarification Department, in Point Comfort's Safety and Industrial Hygiene Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

William Kimpel
47 Kramer Place
Mandeville, LA 70471
Phone: 504-727-4675

Mr. Kimpel is a former employee at Alcoa's Point Comfort, Texas plant. Mr. Kimpel began his employment with Alcoa in 1977 at Alcoa's Bauxite, Arkansas plant. During his employment with Alcoa, Mr. Kimpel has also worked in the Calcination and Clarification Departments, worked as an Engineering Supervisor, and as a Procurement Manager.

Mr. Kimpel may offer testimony relating to any of his Alcoa positions. Mr. Kimpel may testify based on his experience and training concerning Alcoa's general policies and procedures and concerning policies and procedures followed at Point Comfort generally, in Point Comfort's Procurement Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Richard Klimatchek
Ezzel Road
Hallettsville, TX 77964
Phone: 512-798-2448

Mr. Klimatcheck is a former Alcoa employee. Mr. Klimatcheck began his employment at Alcoa's Point Comfort, Texas facility in 1953 and retired in 1983. During his tenure at Point Comfort Mr. Klimatcheck worked as a pot tender in the pot room, a line supervisor in the pot room, a foreman in the utility department, and also worked with temperature control and in the refinery.

Mr. Klimatcheck may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Klimatcheck may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's pot room, smelter, or refinery, in Point Comfort's Utility Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Frank Mabry
95 Houston Street
Port Lavaca, TX 77979
Phone: 512-552-9047

Mr. Mabry is a former Alcoa employee. Mr. Mabry began his employment at Alcoa in 1943 and retired in 1983. He first worked at Alcoa's East St. Louis plant in 1943. In 1961 he began work at Alcoa's Point Comfort, Texas plant and has served as an Assistant Superintendent Electrolyte (Fluoride) Plant, Superintendent (Alumina Plant), Product Manager (Alumina), Product Superintendent (Alumina), and worked in the Environmental Department. From 1969 until 1972 he also worked at Alcoa's Jamaica plant as a Manager (Chemicals).

Mr. Mabry may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Mabry may testify regarding Alcoa's safety program and policies regarding the use of respirators. Mr. Mabry may also testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's Environmental Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

John Mayfield
117 Bloomingdale Circle
Victoria, TX 77904

Phone: **512-574-9955**

Mr. Mayfield is currently employed at Alcoa's Point Comfort, Texas plant as the Director of the Environmental Group. Mr. Mayfield began his tenure at Point Comfort in 1971 as a staff chemist. As a staff chemist he worked throughout the Point Comfort plant. As of 1978, Mr. Mayfield became the Operations Environmental Control Superintendent and held similar positions until 1995. Mr. Mayfield is currently the Environmental Manager for Point Comfort Operations.

Mr. Mayfield may offer testimony relating to any of his Alcoa positions. Mr. Mayfield may offer testimony relating to Alcoa's general polices regarding asbestos removal and the handling of asbestos-containing materials, the location of asbestos-containing materials at Point Comfort, and Alcoa's efforts to identify substitutes for asbestos-containing materials. Additionally, Mr. Mayfield may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort, in Point Comfort's Environmental Department, Safety Department, or Medical Department, and at Alcoa plants with facilities similar to Point Comfort.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Robert Morgan
Environmental Health Strategies
149 Commonwealth Place
Menlo Park, CA 94205
Phone: **650-688-1750**
Fax: **650-688-1799**

Dr. Morgan may be offered as an expert in epidemiology and cancer epidemiology.

Dr. Morgan may testify concerning his analysis of the data on asbestos exposure and the illnesses that may result, cigarette smoking and exposure to environmental tobacco smoke and the illnesses that may result, incidence of cancer in the general population including the effects of age on the incidence of cancer, incidence of cancer among aluminum workers, and heredity as a factor in the development of cancer. Dr. Morgan may testify about the development of this knowledge historically.

Dr. Morgan may testify concerning the principles employed in determining the causes and contributing factors of individual cancers and other diseases. Dr. Morgan will apply these principles to Plaintiffs' medical conditions.

Dr. Morgan may testify concerning the science of epidemiology, the appropriate use of epidemiology in addressing causal issues, the types of studies used in epidemiology to address causal issues, biostatistical aspects of epidemiologic investigations and the criteria used to interpret epidemiological data.

Dr. Morgan may testify in depth about the epidemiologic studies addressing the causal association between cigarette smoking, second-hand exposure to cigarette smoking, the increased risk of lung cancer, and the fact that asbestos exposure, in the absence of a confirmed diagnosis of asbestosis, is not causally associated with lung cancer or an increased risk of lung cancer. Dr. Morgan may testify about the relationship between smoking, asbestos and cancer.

Dr. Morgan's testimony will be based on his training, experience, education, review of the relevant medical and scientific literature, a review of medical records and deposition transcripts.

Daniel Nelsen
15 Jade Drive
Victoria, TX 77904
Phone: 512-576-5413

Mr. Nelsen is a former Alcoa employee. Mr. Nelsen began his employment with Alcoa in 1949 and retired in 1985. He began his employment at Alcoa's Point Comfort, Texas facility as a technical apprentice in the metallurgical department and later became a pot repair room superintendent. Mr. Nelsen worked at Point Comfort until 1963. During his tenure at Point Comfort Mr. Nelsen also worked in Point Comfort's casting department, pot rooms, and production department.

Mr. Nelsen may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Nelsen may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort generally, in Point Comfort's pot rooms, in Point Comfort's casting and production departments, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Larry Onken
202 W. Larkspur
Victoria, TX 77904
Phone: 512-576-0126

Mr. Onken is a former Alcoa employee. Mr. Onken was employed at Alcoa's Point Comfort, Texas plant from 1965 through his retirement in 1996. During his tenure at Point Comfort, Mr. Onken was employed as a lab assistant, an engineering technician (in both the engineering and environmental departments), and worked in the Environmental Department.

Mr. Onken may offer testimony relating to any of his Alcoa positions. Mr. Onken may offer testimony relating to asbestos abatement and dust sampling at Point Comfort. Additionally, Mr. Onken may also testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's Environmental Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Nancy Peikert
601 Sunnydale
Port Lavaca, TX 77979
Phone: 512-987-6209

Ms. Peikert is currently employed at Alcoa's Point Comfort, Texas plant as a registered industrial nurse. She has been so employed since 1975.

Ms. Peikert may offer testimony relating to any of her Alcoa positions. Ms. Peikert may testify based on her experience and training concerning Alcoa's medical surveillance program, Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort generally, in Point Comfort's Medical Department, and at Alcoa plants with facilities similar to Point Comfort.

In addition to offering factual testimony, she may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Ken Peterson
HC2 Box 380
Palacios, TX 77465
Phone: 512-972-2906

Mr. Peterson is a former Alcoa employee. Mr. Peterson began his employment at Alcoa's Point Comfort, Texas facility in 1949 and retired in 1983. During his tenure at Point Comfort Mr.

Peterson worked as a paste plant technician, a paste plant foreman, a pot repair foreman, and a line supervisor.

Mr. Peterson may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Peterson may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's pot room, in Point Comfort's paste plant, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Leslie A. Pfeil
11 Pecan Drive
Port Lavaca, TX 77979-5614
Phone: 512-552-3839

Mr. Pfeil is a former Alcoa employee. Mr. Pfeil began his employment at Alcoa in 1956 and retired in 1988. During his tenure with Alcoa, Mr. Pfeil was employed as a buyer stores administrator.

Mr. Pfeil may offer testimony relating to any of his Alcoa positions. Mr. Pfeil may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in the Purchasing/Stores Department, and at Alcoa plants with facilities similar to ones at which he has worked. Mr. Pfeil may testify regarding Alcoa's efforts to locate substitutes for asbestos containing materials.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Al Rambikur
P.O. Box 507
Point Comfort, TX 77978
Phone: 512-987-2821

Mr. Rambikur is a former Alcoa employee. Mr. Rambikur began his employment at Alcoa in 1942 and worked at Alcoa's Point Comfort, Texas facility from 1963 until his retirement in 1978. While at Point Comfort, Mr. Rambikur worked in the smelting and metallurgical divisions and later oversaw the Environmental Department.

Mr. Rambikur may offer testimony relating to any of his Alcoa positions. Mr. Rambikur may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort, in Point Comfort's pot room, in Point

Comfort's smelting and metallurgical divisions, in Point Comfort's Environmental Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Records Custodian
Alcoa Corporate Offices
201 Isabella Street
Pittsburgh, PA 15212
Phone: 412-553-4545

Records Custodian
Alcoa Point Comfort Operations
State Highway 35
Point Comfort, TX 77978
Phone: 512-987-6180

Records Custodian
Alcoa Technical Center
7th Street Road
Route 780
Alcoa Center, PA 15069
Phone: 412-339-6651

Denise Richardson
2004 Justice Drive
Port Lavaca, TX 77979
Phone: 512-552-5168

Ms. Richardson is a former Alcoa employee and was employed as a Staff Industrial Hygienist at Point Comfort Operations from 1992 until 1999.

Ms. Richardson may offer testimony relating to any of her Alcoa positions. Ms. Richardson may offer testimony relating to the location of asbestos-containing materials at Point Comfort and dust level count sampling conducted at Point Comfort. Additionally, Ms. Richardson may testify based on her experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort generally, by Point Comfort's industrial hygienists, in Point Comfort's Safety and Medical Departments, and at Alcoa plants with facilities similar to Point Comfort.

In addition to offering factual testimony, she may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Richard Ripley
109 Chantilly
Port Lavaca, TX 77979
Phone: 512-552-1775

Mr. Ripley is currently employed at Alcoa's Point Comfort, Texas plant as a Construction Superintendent. Mr. Ripley began his employment at Point Comfort in 1967 as an engineer in Smelting, from 1980 until 1981 he was employed as a Safety Manager, and since 1981 has worked as an engineer. From 1969 through 1978, Mr. Ripley was employed at Alcoa's Massena plant.

Mr. Ripley may offer testimony relating to any of his Alcoa positions. Mr. Ripley may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's smelter, in Point Comfort's Safety Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, Mr. Ripley may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Lee Ross, Jr.
609 Mallette Drive
Victoria, Texas 77904
Phone: 512-575-7369

Mr. Ross is a current Alcoa employee. Mr. Ross began his employment at Alcoa's Point Comfort, Texas facility in 1967. Mr. Ross has been employed at Point Comfort in the pot rooms in various positions, as well as in the laboratory, the maintenance department, and in stores.

Mr. Ross may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Ross may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, Point Comfort's pot rooms, Point Comfort's calcination area, by the Maintenance Department, and at Alcoa plants with facilities similar to the ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background, and training in the field.

Gene Sampson
209 Sunnydale
Port Lavaca, Texas 77979
Phone: 512-552-3608

Mr. Sampson is a former Alcoa employee. Mr. Sampson was employed Alcoa's Point Comfort, Texas facility. His last job at Point Comfort was a supervisor in calcination.

Mr. Sampson may offer testimony relating to any of his positions at Alcoa. Mr. Sampson may offer testimony relating to substitutes for asbestos containing materials and the use of respirators. Additionally, he may testify regarding Alcoa's general policies and procedures and policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's calcination area, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background, and training in the field.

Claude Scott
515 Rattan Drive
Victoria, TX 77901
Phone: 512-575-8520

Mr. Scott is a former Alcoa employee. Mr. Scott began his employment at Alcoa in 1952 and retired in 1984. He first worked as an Industrial Engineer at Alcoa's Mobile plant. In 1955 he became a Superintendent of Labor Relations at the Mobile plant. In 1961 he became employed as the Personnel Manager at Alcoa's Bauxite, Arkansas plant. In 1968, he became the Personnel Superintendent at Alcoa's Point Comfort, Texas plant. Mr. Scott remained at the Point Comfort plant until his retirement in 1984. While at Point Comfort he also worked in the Safety Department and was employed as an Industrial Engineer.

Mr. Scott may offer testimony relating to any of his Alcoa positions. Mr. Scott may offer further testimony as to the location of asbestos-containing materials at Alcoa's Point Comfort plant and Point Comfort's efforts to monitor dust levels. Additionally, Mr. Scott may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Point Comfort, in Point Comfort's potroom, in Point Comfort's Safety Department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Bobby Sheppard
725 Gilbert Road
Edna, TX 77957
Phone: 512-987-2719

Mr. Sheppard is a former Alcoa employee. Mr. Sheppard began his employment at Alcoa in 1950 and retired in 1990, although he actually stopped working in 1988. In 1950, he began his tenure at Alcoa's Point Comfort, Texas plant in the Medical Department. From 1951 until 1955, he served in the United States Navy. In 1957, after receiving training as an X-ray technician, he returned to Point Comfort as a Technician in the Medical Department and later worked at Point Comfort in Security (Fire protection).

Mr. Sheppard may offer testimony relating to any of his Alcoa positions. Mr. Sheppard may testify regarding Alcoa's medical department including the completion of annual employee physical examinations. Additionally, Mr. Sheppard may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's medical department, in Point Comfort's safety department, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Harvey Skow
Box 119
Point Comfort, TX 77978
Phone: 512-987-2792

Mr. Skow is currently employed at Alcoa's Point Comfort, Texas plant as an Unit Supervisor of painters and insulators. He has worked at the Point Comfort facility since 1960. During this time he has also been employed as a painter apprentice and a painter.

Mr. Skow may offer testimony relating to any of his Alcoa positions. Mr. Skow may further testify as to the location of asbestos-containing materials and the use of respirators. Additionally, Mr. Skow may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Alcoa's Point Comfort plant generally and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Dr. Gail Stockman
703 E. Marshall, Ste. 4002
Longview, Texas

Dr. Stockman may be called to testify about the medical condition of the Plaintiffs; anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regard to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems; the nature of asbestos and asbestosis; 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 and other causes of obstructive and restrictive disease or defects of the respiratory system; the various causes of changes on x-rays, and the radiology of asbestos-related diseases; 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 or asbestos exposure without asbestosis, compared with non-asbestotic asbestos workers, non asbestos exposed workers, and with the general population; the import of any exhibit (including without limitation, corporate documents of defendants) introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness; cigarette smoking and its effect on the lung and other organs; 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, or asbestos exposure without asbestosis, on disability and life expectancy; effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; cancer incidence in the general population and among asbestos workers and its potential causes; the history of evolution and knowledge of asbestos related diseases; the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types in the cause of lung cancer and mesothelioma; epidemiology of lung cancer, mesothelioma and asbestos-related disease in general; and to the extent not covered above, asbestos medicine in general. If Dr. Stockman is to testify in any individual case, a report will be furnished with respect to any such case.

Robert Trevino
201 Woodchase Drive
Victoria, Texas 77904
Phone: 512-573-0464

Mr. Trevino is a current Alcoa employee. Mr. Trevino began his employment at Alcoa's Point Comfort, Texas facility in 1966. He has been employed at Point Comfort in the pot room, Safety Department, and in calcination.

Mr. Trevino may offer testimony relating to any of his Alcoa positions. Additionally, Mr. Trevino may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally, in Point Comfort's pot rooms, in Point Comfort's calcination area, by Point Comfort's Safety Department, and at Alcoa plants with facilities similar to the ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background, and training in the field.

John Vasquez
306 Bloomingdale Circle
Victoria, TX 77904
Phone: 512-575-8147

Mr. Vasquez is currently employed at Alcoa's Point Comfort, Texas plant as the Personnel and Public Relations Manager. Mr. Vasquez has been employed with Alcoa since 1973 and has been employed as a mechanical engineer, a personnel administrator, and an industrial relations supervisors.

Mr. Vasquez may offer testimony relating to any of his Alcoa positions. Mr. Vasquez may testify that Alcoa employees were covered under the appropriate Worker's Compensation statute during the relevant time periods. Additionally, Mr. Vasquez may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Alcoa's Point Comfort plant generally, by Point Comfort's Industrial Hygiene Department, in Alcoa's Safety and Medical Departments, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Leroy Wagner
P.O. Box 96
Westhoff, TX 77994
Phone: 512-552-9815

Mr. Wagner is currently employed at Alcoa's Point Comfort, Texas plant as an industrial hygienist. In 1969 he joined the Industrial Hygiene Department at Point Comfort.

Mr. Wagner may offer testimony relating to any of his Alcoa positions. Mr. Wagner may further testify as to the location of asbestos-containing materials at Point Comfort, dust sampling conducted at Point Comfort, training sessions and safety meetings conducted at Point Comfort, and Alcoa's regulations relating to the handling of asbestos-containing materials. Additionally, Mr. Wagner may testify based on his experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed at Alcoa's Point Comfort plant generally, by Point Comfort's Industrial Hygiene Department, in by Alcoa's Safety Department and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Thomas Washam, M.D.
P.O. Box 69
Vinton, OH 45686
Phone: 740-388-8248

Dr. Washam served as the Texas area medical director for Alcoa beginning in 1981. Dr. Washam retired in 1996. In addition to offering factual testimony, Dr. Washam may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background and training in the field.

Doris Welch
518 Willowwick
Port Lavaca, TX 77979

Phone: 512-987-6206

Ms. Welch is currently employed as an administrative assistant at Alcoa's Point Comfort, Texas plant where she has been employed since 1949.

Ms. Welch may offer testimony relating to any of her Alcoa positions. Ms. Welch may testify based on her experience and training concerning Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort plant generally and at Alcoa plants with facilities similar to ones at which she has worked.

In addition to offering factual testimony, she may offer specialized or expert testimony. It is anticipated that her testimony may include "expert testimony," based on her experience, background and training in the field.

Mark Wick
301 Peacock Drive
Charlottesville, VA 22903-9716
804-245-9613

Dr. Wick is a physician who is an expert in the field of pathology. Furthermore, he is an expert in the etiology and diagnosis of asbestos-related disease based upon review of tissue and tissue slides obtained as a result of biopsy or autopsy.

His testimony will include a discussion of asbestos and its effect on human health generally and Plaintiffs specifically, and the effect that other substances have on human health generally and Plaintiffs' conditions specifically. Dr. Wick is a pulmonary pathologist who may testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the Plaintiffs. Dr. Wick may also testify regarding the medical condition of Plaintiffs based on review of medical records, x-rays, plaintiffs' experts' reports and supplemental reports. He will testify to the physical condition of Plaintiffs, based on his review of Plaintiffs' records and his deposition testimony.

Dr. R. Keith Wilson
Respiratory Consultants of Houston
6565 Fannin
Fondren Building
Houston, Texas 77030.

Dr. Wilson may be called to testify about the medical condition of the Plaintiffs; anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regard to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems; the nature of asbestos and asbestosis; 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 and other causes of obstructive and restrictive disease or defects of the respiratory system; the various causes of changes on x-rays, and the radiology of asbestos-related diseases; 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 or asbestos exposure without asbestosis, compared with non-asbestotic asbestos workers, non asbestos exposed workers, and with the general population; the import of any exhibit (including without limitation, corporate documents of defendants) introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness; cigarette smoking and its effect on the lung and other organs; 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, or asbestos exposure without asbestosis, on disability and life expectancy; effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; cancer incidence in the general population and among asbestos workers and its potential causes; the history of evolution and knowledge of asbestos related diseases; the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types in the cause of lung cancer and mesothelioma; epidemiology of lung cancer, mesothelioma and asbestos-related disease in general; and to the extent not covered above, asbestos medicine in general. If Dr. Wilson is to testify in any individual case, a report will be furnished with respect to any such case.

Curtis Wofford
315 Robinson Street
Lolita, Texas 77971
Phone: 512-874-4277

Mr. Wofford is a former Alcoa employee. Mr. Wofford began working at Alcoa's Point Comfort, Texas facility in 1949. He initially worked in the utility department and then shortly after that began his career in the pot room.

Mr. Wofford may offer testimony relating to any of his Alcoa positions. Mr. Wofford may offer testimony concerning the process and the various jobs performed in the pot room. He may offer testimony relating to substitutes for asbestos containing materials and the use of respirators. Additionally, Mr. Wofford may testify regarding Alcoa's general policies and procedures and the policies and procedures followed in Alcoa's Point Comfort pot room, at the plant generally, and at Alcoa plants with facilities similar to ones at which he has worked.

In addition to offering factual testimony, he may offer specialized or expert testimony. It is anticipated that his testimony may include "expert testimony," based on his experience, background, and training in the field.

All witnesses named by any other party in this action, even if the plaintiff(s) or defendant naming that witness is no longer a party to this lawsuit at the time of trial.

All witnesses deposed or to be deposed by any party in this action, even if the plaintiff or defendant deposing that witness is no longer a party to this lawsuit at the time of trial.

All doctors and other health care professionals who have treated or examined plaintiff or plaintiffs.

Records Custodians as many be necessary to authenticate documents to be used by Alcoa at trial.