

HAYS, McCONN, RICE & PICKERING
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
400 TWO ALLEN CENTER
1200 SMITH STREET
HOUSTON, TEXAS 77002
TELEPHONE (713) 854-1111
TELESCOPIER (713) 850-0027



DIRECT LINE: (713) 752-6309
E-MAIL: CSW@HAYSMcCONN.COM

CRAIG S. WOLCOTT
BOARD CERTIFIED - CIVIL TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION

August 6, 1999

Mr. Oscar Soliz
District Clerk
Nueces County Courthouse
901 Leopard Street
Corpus Christi, Texas 78401

VIA FEDERAL EXPRESS

Re: Cause No. 96-03172-A; *Ramon T. Cedillo, et al. vs. Owens-Corning Fiberglas Corporation, et al.*; In the 28th Judicial District Court of Nueces County, Texas

Dear Mr. Soliz:

Enclosed for filing please find an original and one copy of the following:

1. Defendant Union Pacific Resources Company f/k/a Champlin Petroleum Company, Individually and as Successor by Merger to Pontiac Refining Corporation Response to Plaintiffs' Motion to Compel Discovery

Please return a file-stamped copy of same to the undersigned in the self-addressed stamped envelope enclosed for your convenience.

Thank you for your attention to this matter.

Sincerely yours,

HAYS, McCONN, RICE & PICKERING

A handwritten signature in black ink, appearing to read "Craig S. Wolcott".

Craig S. Wolcott

CSW:clp
Enclosures

CSW409461.1

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Mr. Oscar Soliz

August 6, 1999

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**cc: Ms. Melissa Hutto (w/encl.)
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, Texas 75219**

VIA FACSIMILE (214) 520-1181

All other counsel of record (w/encl.)

VIA REGULAR MAIL

CSW409461.1

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NO. 96-03172-A

RAMON T. CEDILLO; ALVINO RESENDO	§	IN THE DISTRICT COURT OF
LOPEZ; AMBROSIO NINO RAMIREZ; and	§	
RICHARD FUENTES VELA	§	
	§	
VS.	§	NUECES COUNTY, TEXAS
	§	
OWENS-CORNING FIBERGLAS	§	
CORPORATION, ET AL.	§	28TH JUDICIAL DISTRICT

DEFENDANT UNION PACIFIC RESOURCES COMPANY
W/a CHAMPLIN PETROLEUM COMPANY, INDIVIDUALLY
AND AS SUCCESSOR BY MERGER TO PONTIAC REFINING CORPORATION
RESPONSE TO PLAINTIFFS'
MOTION TO COMPEL DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant UNION PACIFIC RESOURCES COMPANY, and files this its Response to Plaintiffs' Motion to Compel Discovery, and in support thereof would show as follows:

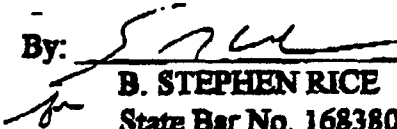
I.

Defendant Union Pacific Resources Company has served on Plaintiffs its Second Supplemental Responses and Objections to the Plaintiff's First Set of Interrogatories and Request for Production. A copy of the Second Supplemental Responses and Objections to the Plaintiff's First Set of Interrogatories and Request for Production are attached hereto and labeled Exhibit "A," and incorporated herein by reference for all purposes. Included therein is identification of persons with knowledge of relevant facts, and identification of known, non-objectionable documents with information responsive to Interrogatories and/or responsive to Request for Production. The documents identified are quite voluminous, but are available for inspection at a mutually-convenient date and time.

WHEREFORE, PREMISES CONSIDERED, UNION PACIFIC RESOURCES COMPANY
prays that Plaintiffs' Motion to Compel be in all things denied, and for such other and further relief
to which it may be justly entitled.

Respectfully submitted,

HAYS, McCONN, RICE & PICKERING

By: 

B. STEPHEN RICE
State Bar No. 16838000
400 Two Allen Center
1200 Smith Street
Houston, Texas 77002
Telephone: (713) 654-1111
(713) 655-9212 (Facsimile)

ATTORNEYS FOR DEFENDANT
UNION PACIFIC RESOURCES COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was
forwarded via certified mail/return receipt requested and/or via hand-delivery and/or via facsimile to
all counsel of record on this 6th day of August, 1999.


B. STEPHEN RICE