

PLAINTIFFS
EXHIBIT
JM 766

MISC.
Russell

MTC 011589

COVER SHEET FOR B-LEVEL DOCUMENTS
REMOVED IN PRIVILEGE REVIEW

ORIGINAL B-LEVEL BOX NO. _____

PRODUCTION BOX NO. DEN-12

FILE NO. 3

FILE NAME Russell

REMOVED
JUN 83

MTC 011590

2/24/82

SHERMAN ASBESTOSIS

MARIAN DOWNS AND DOROTHY

Review of Plaintiffs' Discovery
Requests and Interrogatories

Downs only

6/20/79	Plaintiffs' Interrogatories to J-M International
7/18/79	J-M's answers

Downs and Gage

3/28/80	Plaintiffs' Request to Produce to J-M Corporation, Sales, Products, International, and Canadian
6/23/80	J-M entities' answer (objecting to each request)
7/1/80	Plaintiffs' Motion to Compel Dis- covery and for Sanctions (we do not have a copy)
8/4/80	J-M's response to Plaintiffs' Motion

7/1/80	Plaintiffs' Request to Produce to
2/10/81	J-M Affiliated Companies Defendants' production

10/7/80	Plaintiffs' Request to Produce to
2/10/81	J-M Affiliated Companies Defendants' production

7/7/80	Plaintiffs' second set of Interro- gatories and Request for Production
2/10/81	to all J-M Affiliated Companies Defendants' Answers (with 1,500 pages of documents)
7/31/81	Defendants' Supplemental Answers

PRODUCED
J-M 83

MTC 011591

MARIAN DOWNS AND DOROTHY GAGE
Review of Plaintiffs' Discovery
Requests and Interrogatories

2/24/82

3/4/81

Defendant J-M Sales Interrogatories
to Plaintiffs

2/24/82

As of this date, neither Gage or
Downs have answered J-M's Interro-
gatories

PRIVILEGED
J-M 83

13-11147
004

SUMMARY OF PERSONAL AND MEDICAL
RECORDS FROM JOHNS-MANVILLE DENISON PLANT

PERSONNEL

J-M Employment - October 26, 1970, to May 2, 1980; reason - another job. He was earning \$5.62 per hour at separation. His evaluation at that time - quality was good; quantity was good; attitude was good; attendance was very good.

Previous Employments

August 1957 to June 1962 - Manager of H. L. Green Building, Dallas, Texas, for the McCrory Corporation, earning \$400.00 per month plus bonus.

November 1962 to September 1967 - Personnel work for Johnson & Johnson, Sherman, Texas, earning \$114.00 per week.

October 1967 to November 1968 - Long distance truck driver for Frozen Food Express, Dallas, Texas, earning \$132.50 per week.

November 1968 to November 1969 - High-temp furnace operator for Texas Instruments, earning \$2.25 per hour.

November 1969 to May 1970 - Drill press and auto coning machine operator for Falls Machine Co., Akron, Ohio, earning \$2.10 per hour.

May 1970 to September 1970 - Shipping department and electric plating Machine operator for Johnson Steel & Wire, Akron, Ohio, earning \$2.79 per hour.

MEDICAL

Health Progress Notes

3/8/74 - surgery on left wrist for cyst removal by family doctor, Dr. Baur; missed 2-1/2 weeks from work.

7/28/75 - surgical repair of left inguinal hernia by family doctor, Dr. O. T. Baur. Missed 2 weeks from work.

ANNUAL PHYSICAL EXAMINATIONS

November 1979 - FVC 88%; FEV₁ 81%; chest x-ray within normal limits; sputum cytology negative; BP 114/70; lungs normal; has smoked 1 pack of cigarettes per day for the last 20 years; weight 127. On the questionnaire he stated that he had a sore throat, heart murmur, numbness, and sleeping difficulties; he has worn a respirator at work for 2 years. He worked in the plastic industry for 1 year.

PRIVILEGED
J-M 83

EMPLOYER'S REPORT OF INJURY

December 1970 for a crush injury and laceration to the right 4th and 5th fingers.

PRIVILEGED
J-M 03

MTC 011594

13-11147

CASE STATUS REPORT

Donald M. Russell
M-81-96-CA
J-M No. 13-11147

Plaintiff was employed at the Johns-Manville Denison plant from October 26, 1970, to May 2, 1980, which is when he is claiming asbestos exposure. We have not received Plaintiff's answers to interrogatories. His deposition was scheduled for May 1982, but was cancelled. It will be rescheduled for sometime during September through November 1982. A copy of the summary of Plaintiff's personnel and medical plant records is attached. An attorney record service is in the process of subpoenaing medical records.

(7/1/82)

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J-M 83**

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