PLAINTIFF'S EXHIBIT A-416

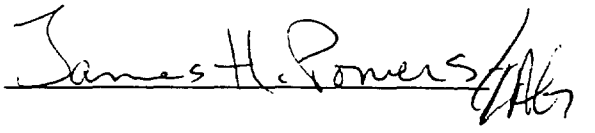
CAUSE NO. 90G2055

WELDON R. MOAKE and JANICE I. MOAKE; KEVIN R. MOAKE; DANA R. ASHLEY; and, MACK K, MOAKE	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
VS.	§	BRAZORIA COUNTY, TEXAS
OWENS – CORNING FIBERGLAS CORPORATION, ET AL.	§	
Defendants.	§	239TH JUDICIAL DISTRICT

DEFENDANTS' LINE AND PAGE DESIGNATIONS

Defendants Armstrong World Industries, Inc. United States Gypsum Company, Quigley Company, Inc., Certainteed Corporation, Union Carbide Corporation d/b/a Union Carbide Chemicals and Plastics, Inc. and T&N Ltd (f/k/a T&N plc and Turner and Newall plc), hereinafter referred to as "Defendants", Line and Page Designations to the above referenced cases.

Respectfully submitted,

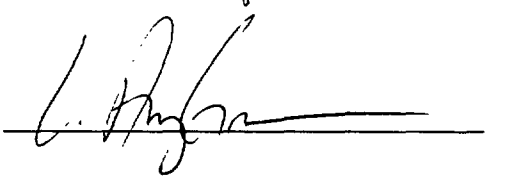
By: 

James H. Powers
Texas State Bar No. 16217400
Sharla J. Frost
Texas State Bar No. 07491100
Gwendolyn S. Frost
Texas State Bar No. 07488750
POWERS & FROST, L.L.P.
2600 Two Houston Center
909 Fannin
Houston, Texas 77010
(713) 767-1555
(713) 767-1799 – Fax

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of Defendants' Line and Page Designations has been forwarded to Plaintiffs' counsel of record either by first class mail, return receipt requested, delivery or facsimile on this the 1st day of September, 2000.



DEFENDANT'S LINE AND PAGE DESIGNATIONS

DEFENDANTS

Deposition testimony of Dr. Elvin E. Adams, in Robert Solomon v. Armstrong, Inc., No. TY-84-39-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

Page	Line	Through	Page	Line
4	9		9	2
8	17		11	11
11	14		12	5
12	11		15	4
15	5		17	15
17	16		18	7
18	8		27	12
28	9		44	13
54	14		55	15
56	12		58	23
59	15		60	11
61	9		63	17
64	9		66	1
67	10		67	25
68	6		68	9
69	3		70	2
71	13		72	13
75	8		76	1
76	10		76	25
81	4		85	1
86	21		86	23
87	21		88	4
90	2		91	16

Videotape deposition testimony of Steven M. Ayers, M.D. in In re: Asbestos Personal Injury Cases in the following courts: Circuit Court of Baltimore City, Maryland, Circuit Court for Washington County, Maryland; Circuit Court for Prince Georges County, Maryland; Circuit Court for Cecil County, Maryland; Circuit Court for St. Mary's County, Maryland; Superior Court of Washington; District of Columbia, Civil Division; Circuit Court of Alleghany County, Maryland; United States District Court for the District of Columbia; United States District Court of Maryland; and Circuit Court for Baltimore County, Maryland BCA 1 through 4, taken on August 10 through August 12, 1989 in Baltimore, Maryland.

Page	Line	Through	Page	Line
7	11		7	13
8	20		15	17
15	21		17	2
17	4		18	13
18	15		20	3
20	5		21	11
21	3		21	14
21	16		21	17
21	19		24	12
46	12		47	5
47	10		48	15
48	17		48	18
48	20		49	7
53	12		54	7
54	9		56	12
56	14		56	16
56	18		58	9
58	11		60	13
60	15		62	4
62	10		62	11
62	13		64	3
64	6		64	19
64	21		65	8
65	10		65	14
65	16		65	20
66	6		67	3
67	5		67	19
69	2		69	15
69	17		69	19
69	21		70	8
70	10		71	1
71	3		72	4
72	6		73	10
73	13		73	16
73	18		74	9
74	11		74	16
75	1		75	3
75	5		75	16
75	18		77	13
77	16		77	19

77 Page	21 Line	Through	78 Page	6 Line
78	7		78	21
79	2		80	12
80	14		81	19
81	21		82	7
82	9		83	3
83	5		83	18
83	21		86	8
86	10		87	6
87	8		88	13
88	15		88	20
89	1		89	3
89	5		90	12
90	is		90	17
90	19		92	7
93	2		93	11
94	4		94	8
94	10		95	8
95	13		95	15
95	17		96	1
96	3		96	16
96	19		97	6
97	9		97	11
97	13		97	17
98	13		99	14
99	16		100	1
100	3		100	17
100	20		101	1
101	13		101	19
101	21		102	4
102	6		102	8
102	10		102	14
102	16		103	5
103	7		103	10
103	13		103	16
103	18		104	6
104	8		104	14
104	17		104	20
105	1		105	9
105	12		105	21
106	3		106	11
106	18		107	1

107 Page	3 Line	Through	107 Page	15 Line
108	5		109	3
109	6		109	21
110	3		111	5
111	8		111	10
111	12		112	2
112	4		113	4
113	10		113	21
114	16		117	2
117	18		118	18
119	7		119	8
110	10		120	20
121	4		121	6
121	9		121	11
122	13		122	17
122	19		123	9
123	12		125	2
125	6		125	18
125	21		127	6
127	8		128	4
128	7		128	21
129	2		129	12
129	14		130	16
130	18		131	18
131	20		132	17
132	19		136	13
137	1		137	6
137	8		137	11
137	13			
137	6		139	17
139	19		139	21
140	2		140	10
140	12		140	14
140	17		143	6
143	8		143	17
144	8		146	2
146	4		146	6
146	9		147	5
147	14		148	9
148	12		148	21
149	4		150	3
150	6		150	8

150 Page	10 Line	Through	150 Page	21 Line
151	4		151	8
151	10		151	is
151	18		151	20
152	1		152	12
152	14		152	17
152	21		153	3
1S3	5		153	10
153	12		153	17
153	19		154	6
154	8		154	12
154	14		154	15
155	15		155	18
155	20		156	3
156	4			
156	6		156	9
156	11		156	13
156	15		156	20
157	1		157	10
157	12		158	16
158	18		159	6
159	8		159	12
159	14		159	19
159	21		160	14
160	16		160	17
160	19		161	7
161	9		161	16
161	18		162	10
162	12		162	13
162	15		163	8
163	10			
163	12		164	1
164	3		164	20
165	1		165	10
165	12		165	18
165	20		166	2
166	4		166	9
166	11		166	13
166	16			
166	18			

Trial Testimony of Dr. James D. Crapo in Paul Cochran vs. Keene Corporation, et al., Cause No. A-931,139-C, in the 128th Judicial District Court of Orange County, Texas on February 23, 1996, as follows:

Page	Line	Through	Page	Line
744	21		745	11
745	16		745	18
746	5		747	20
747	24		759	12
759	17		764	25
765	14		766	14
766	22		774	9
776	18		780	24

Deposition testimony of Irby Eldridge in Mary Joyce Lose v. Johns-Manville Sales Corporation, et al. and other, Civil Action No. CV-80-002789, Circuit Court of the Thirteenth Judicial District of Alabama, Mobile County, taken on May 25, 1981 as follows:

Page	Line	Through	Page	Line
17	20		20	11
21	9		21	19
22	17		22	23
26	16		26	1
26	13		28	1
30	7		30	20
38	13		39	3
40	9		41	7

Deposition of Dr. Milton Gray in Charles Hatley Newman v. Raymark, et al., No. M-79-124-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

Page	Line	Through	Page	Line
3	16		3	17
22	8		25	21
26	2		27	3
27	11		28	10
28	20		29	17
30	3		32	17
36	20		37	21
46	11		48	11
48	23		48	25

Deposition testimony of Dr. Milton Gray in Henry E. Holland, et al. v. Johns-Manville, et al., No. M-80-152-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

Page	Line	Through	Page	Line
10	14		10	24
11	18		12	1
12	11		13	24
15	10		15	13
19	6		20	11
26	5		26	20
26	24		27	21
38	20		38	25
40	11		41	2
53	9		54	13
58	15		59	17
80	23		81	20
90	19		91	20
96	7		97	2
171	25		173	13

Deposition testimony of Dr. Milton Gray in Philip L. Cano, et ux v. Raymark, et al., taken on November 21, 1983, No C-83-49-CA, in the U.S. District Court for the Southern District of Texas, Corpus Christi Division, as follows:

Page	Line	Through	Page	Line
7	19		7	20
19	23		23	11
25	2		28	4
28	12		28	17
29	1		29	7

Deposition testimony of Dr. Milton Gray in Charlie Hatley Newman, et al. v. Johns Manville, et al., in the U.S. District Court for the Eastern District of Texas, Marshall Division, as follows:

Page	Line	Through	Page	Line
3	16		3	17
22	8		25	21
26	2		27	3
27	11		28	10

Page	Line	Through	Page	Line
28	20		29	17
30	3		32	17
36	20		37	21
46	11		48	11
48	23		48	25

Deposition testimony of Dr. Milton Gray in Edith Jenkins and Carl E. Jenkins v. Johns-Manville Sales Corporation, et al., Civil Action No. TY-79-61-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

Page	Line	Through	Page	Line
11	15		14	5
15	15		16	19
20	12		20	19

Deposition testimony of Dr. Stanley Donald Greenberg taken in Gerrit Spruit v. The Celotex Corporation, et al., Civil Action No. CA3-85-1979-D, in the U.S. District Court for the Northern District of Texas, Dallas Division, as follows:

Page	Line	Through	Page	Line
5	8		5	10
6	2		6	12
7	2		7	7
15	21		15	2S
18	10		25	16
25	25		34	9
34	13		34	22
35	6		42	8
42	24		44	14
46	3		48	7
50	10		50	23
51	16		53	9
56	11		57	25
58	12		58	24
59	4		59	21
63	7		65	3

Deposition testimony of Andrew T. Haas in Karen L. Barsh v. Keene Corporation, et al. in the U.S. District Court for the Middle District of Florida, Jacksonville Division, taken August 22, 1980 as follows:

Page	Line	Through	Page	Line
4	10		7	4
9	8		10	8
17	7		17	17
27	11		27	21
28	14		28	18
29	2		29	16
34	12		34	16
38	18		39	11
40	8		40	15
42	7		42	9
43	3		44	16
45	5		45	7
46	16		47	18
48	19		49	4
49	14		50	14
51	22		52	10
55	8		55	18
56	7		57	6
57	16		58	4
59	3		59	10
64	5		64	22
65	7		65	11
68	12		68	19
69	7		69	10
70	6		70	9
72	1		72	4
72	15		72	18
76	11		76	15
77	0		80	11
82	16		82	22
84	16		84	21
85	6		85	8
87	2		87	9
88	12		89	15
90	13		90	17
94	6		94	17
96	8		100	4
101	6		102	4
105	13		105	22
107	10		110	13
112	8		114	2

Page	Line	Through	Page	Line
119	22		120	21
126	13		126	21
127	12		131	11
132	3		132	7
148	13		148	15
152	12		153	17
155	22		156	20
157	7		157	14
164	20		165	9
171	4		171	13
177	1		177	15
178	16		180	8
181	10		182	1

Deposition testimony of Andrew T. Haas in In Re: Asbestos Cases, in the U.S. District Court for the Northern District of Georgia, Atlanta Division, taken August 22, 1980 as follows:

Page	Line	Through	Page	Line
6	20		6	24
20	14		20	22
27	13		32	4
38	12		41	8
42	18		43	10
44	1		47	24
48	17		49	11
51	11		51	18
55	18		60	8

Video deposition testimony of Horton Corwin Hinshaw, Sr., M.D. taken November 18, 1984 through December 11, 1984, in In Re: Related Asbestos Cases, No. C-83-6251-RFP (all cases), in the U.S. District Court for the Northern District of California as follows:

Page	Line	Through	Page	Line
		Volume 1		
12	5		15	12
15	15		20	21
21	26		25	3
27	5		28	12

Page	Line	Through	Page	Line
32	9		32	23
35	1		36	6
37	19		38	27
40	14		41	11
42	15		44	18
44	26		45	1
46	27		47	11
47	27		50	1
50	5		51	4
53	20		54	7
54	27		58	6
58	14		58	17
59	8		60	2
60	11		67	25
68	8		68	22
68	27		70	2
70	6		80	10
83	7		83	20
83	24		85	3
85	7		85	13
86	10		88	20
88	28		91	15

Volume 2

101	27		103	12
103	18		105	18
107	1		109	10
110	1		110	9
110	12		110	17
110	25		110	27
111	8		112	28
113	15		115	10
121	20		122	14
123	12		125	14
126	8		128	13
128	24		129	19
129	28		130	5
130	2S		131	19
132	6		132	28

Volume 5

Page	Line	Through	Page	Line
387	24		387	28
403	18		404	2

Deposition testimony of Horton Corwin Hinshaw, Sr., M.D., taken April 23, 1982 in Jimmie L. Vaughan v. Johns-Manville, et al., No. CA3-81-0070-F, in the U.S. District Court for the Northern District of Texas as follows:

Page	Line	Through	Page	Line
9	7		12	11
13	18		14	22
19	25		20	12
21	3		22	14
24	3		24	20
27	7		27	15
31	23		32	9
35	23		37	18
40	12		43	2
43	8		46	4
46	9		48	3
50	1		51	12
51	19		57	14
61	10		62	3
80	3		80	20
81A	5		84	19
85	16		86	20
88	9		88	15

Defendants reserve the right to offer testimony identified by any party, Plaintiffs or Defendants.

Deposition testimony of Dr. Forde A. McIver in O. L. Allen v. Fibreboard Corporation, No. B-81-276-CA, in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken on April 9, 1982.

Page	Line	Through	Page	Line
9	9		10	11
28	3		28	9

Page	Line	Through	Page	Line
33	20		34	13
35	20		35	21
42	8		42	14
62	20		63	15
73	25		74	12

Trial testimony of Joseph Ralph Shrode taken in ' Clarence Bore! v. Fibreboard Corporation, Civil Action No. 6449, in the U.S. District Court for the Eastern District of Texas, as follows:

Page	Line	Through	Page	Line
857	25			
858	1		858	25
859	1		859	17
862	14		862	22
863	4		863	25
864	1		864	3
868	8		868	25
869	1		869	12
870	15		870	25
871	1		871	14

Trial testimony of Joseph Ralph Shrode taken in Clarence Borel v. Fibreboard Corporation, Civil Action No. 6449, in the U.S. District Court for the Eastern District of Texas, as follows:

Page	Line	Through	Page	Line
858	4		858	25
859	1		859	17
861	21		861	25
862	4		862	25
865	13		865	25
866	1		866	25
867	1		867	25
868	1		868	25
869	1		869	12
872	4		872	13
880	3		880	2S
881	1		881	25

Deposition testimony of Roy Steinfurth in Jackie R. Starnes, et ux v. Combustion Engineering, Inc., et al., in the U.S. District Court for the Eastern District of Tennessee, Northeastern Division, taken May 25, 1981 as follows:

Page	Line	Through	Page	Line
4	2		5	8
5	18		6	6
6	10		6	16
7	11		10	12
13	1		13	3
13	15		14	1
17	21		18	7
18	15		20	12
24	1		24	21
40	13		42	8
43	2		43	5
45	19		46	2
48	9		48	22
53	22		5S	4
60	11		60	16
62	4		62	16
66	1		67	12
69	13		70	11
71	20		72	S
73	20		74	11
77	9		77	11
78	11		78	17
87	7		87	19
89	6		90	3
92	21		94	10
94	22		96	2

Deposition testimony of Johnnie M. Stoma in Johnnie M. Stoma v. Johns-Manville Sales Corporation, et al., in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken October 9, 1981 as follows:

Page	Line	Through	Page	Line
7	5		7	25
8	1		8	2
8	18		8	25
9	1		9	2
18	15		18	25

Page	Line	Through	Page	Line
19	1		19	6
20	21		20	25
21	1		21	3
21	9		21	18
21	22		21	25
22	1			
104	18		104	25
105	1		105	6
107	22		107	25
108	1		108	25
109	1		109	3
146	6		146	13

Deposition testimony of Dr. Hans Weill in Ernest Howell v. Johns-Manville Sales Corporation, et al., No. M-80-169-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, in the U.S. District Court for the Eastern District of Texas, Tyler Division, as follows:

Page	Line	Through	Page	Line
4	10		14	16
14	17		15	15
15	16		23	5
23	6		40	23
41	2		46	17
46	18		47	10
47	11		48	16
48	21		52	12
52	13		52	17
52	18		53	16
53	17		66	21
67	6		71	1
71	2		74	4
77	12		77	20
78	14		78	19
89	15		90	12
92	8		94	18

DEFENDANTS' LIST OF POTENTIAL
DEPOSITION AND TRIAL TESTIMONY

1. Edwin Aduddell, by trial testimony in Edwin Aduddel v. Armstrong World Industries, Inc., et al., Civil Action No. CA3-85-1207-H, in the U.S. District Court for the Northern District of Texas, Dallas Division.

2. Edwin Aduddell, by deposition testimony of in Edwin Aduddell v. Armstrong World Industries, Inc., et al., Civil Action No. CA3-85-1207-H, in the United States District Court for the Northern District of Texas, Dallas Division, taken on January 6, 1987.

3. Dr. Steven Ayres, by trial testimony in Loyd Galveston 92, Civil Action No. G-82-144, in the U.S. District Court for the Southern District of Texas, Galveston Division.

4. Dr. Steven Ayres, by trial testimony in William J. Kornegay v. Johns-Manville Sales Corporation, et al., Civil Action No. G81-131 (consolidated) in the U.S. District Court for the Southern District of Texas, Galveston Division.

5. Dr. Harry Demopolous, by trial testimony in Clarence Wilson v. Johns-Manville sales Corp., et al., No. G-81-128-CA.

6. E. W. Hines, by trial testimony in Charlie Hatley Newman, et ux v. Raymark Industries, Inc., et al., Civil Action No. M-79124-CA; given in the U.S. District Court for the Eastern District of Texas, Marshall Division.

7. Dr. H. Corwin Hinshaw, by deposition testimony in William L. Nicar v. Johns-Manville Sales Corp., et al., No. W-81-CA-8.

8. Dr. H. Corwin Hinshaw, by deposition testimony in In Re: Related Asbestos Cases, No. C-83-6251-RFP, in the United States District Court for the Northern District of California; In Re: Related Shipyard and Applicator Cases: Alameda County Asbestos Litigation, in the Superior Court of the State of California, in and for the County of Alameda; Misc. No. 959, In Re: Shipyard and Applicator Cases (Clapper & Brayton) Consolidated for Discovery, in the Superior Court of the State of California, in and for the County of Solano; and In Re: San Francisco Asbestos Complex Litigation, in the Superior Court of the State of California, in and for the City and County of San Francisco.

9. Dr. H. Corwin Hinshaw, by videotape deposition testimony in Antonio Mendoza v. Fibreboard Corporation, et al., No. CA2-80006.

10. Dr. Jerome Kleinerman, by videotape deposition in Shirley Tate v. Minnesota Mining & Manufacturing Corporation (3M Corp., et al.) in the District Court of Nueces County, Texas, 94 Judicial District on May 18, 1989.

11. Cross-examination of Dr. W.T.E. McCaughey by video deposition in Selma Ruth Martin v. Owens Corning Fiberglas Corporation, et al., No. TY-87-12S-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division.

12. Dr. Hans Weill, by deposition testimony in Ernest Howell v. Armstrong World industries, Inc., et al., No. M-80-169-CA.

13. Dr. Thomas M. Wheeler, by videotape deposition testimony in Charles L. Vance v. The Dexter Corporation, Cooper Airmotive, Inc., and Aviall, Inc. v. Union Carbide, No. 85-12339-J in the District Court of Dallas County, Texas, 191st Judicial District taken on August 31, 1988.

14. Dr. Thomas M. Wheeler, by videotape deposition testimony in Charles Vance, et al. v, The Dexter Corporation, et al., Cause No. 85-12339-J in the District Court of Dallas County, Texas, 191st Judicial District taken on August 31, 1988.

15. Any prior deposition or trial testimony of any witness called by any other party, either live or by deposition.

16. Any prior deposition or trial testimony of any physician who has treated, examined, or been consulted regarding the Plaintiff.

17. Any prior deposition or trial testimony of any Plaintiff represented by Plaintiff's attorney herein.

18. Any deposition or custodian of records concerning the Plaintiff.

19. Any deposition taken by any party in this case.