

BRIAN S. CLARY & ASSOCIATES

ATTORNEYS AT LAW

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OF COUNSEL

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LEGAL ASSISTANT

STEPHANIE D. MERCHANT, CLA, TBLS

August 12, 2002

PLAINTIFF'S EXHIBIT

BIR-1181

John S. Appleman, District Clerk
Jefferson County Courthouse
P.O. Box 3707
Beaumont, TX 77704-3707

Re: No. X-9999-999; In Re: Master Asbestos File, in the District Courts of Jefferson
County, Texas.

Dear Sir:

Enclosed please find the following for filing in the above-referenced cause of action:

DEFENDANT BIRD INCORPORATED'S:

1. **Certificate of Written Discovery** (re: Supplemental Responses to
Master Discovery: ~~Bird Privilege Log~~ and documents Bates-stamped
"Bird 021472 to 022721"; and Bird's Objections to the Baron & Budd
Exhibit List Relative to Bird).

Please file-stamp the extra copy(ies) of this document and return same to us in the enclosed
self-addressed, stamped envelope. Thank you for your attention in this matter.

Sincerely,



Brian S. Clary

BSC/hc

Enclosures

cc: Mr. William K. Tapscott, Jr.
Baron & Budd
3102 Oak Lawn Ave., Suite 1100
Dallas, Texas 75219
w/all enclosures

NO. X-9999-999

IN RE: MASTER ASBESTOS FILE § IN THE DISTRICT COURTS OF
 §
 § JEFFERSON COUNTY, TEXAS

CERTIFICATE OF WRITTEN DISCOVERY

Pursuant to the Texas Rules of Civil Procedure, the undersigned attorneys of record for Defendant, BIRD INCORPORATED, hereby certifies that the following written discovery was sent to Plaintiff:

§ ***Defendant, Bird Incorporated's Supplemental Response to Plaintiff's Master Production Requests*** (re: ~~Bird Privilege Log~~, and documents Bates-stamped "Bird 021472 to 022721"; Bird's Objections to Baron & Budd's Exhibit List Relative to Bird).

The above discovery was forwarded to Baron & Budd, P.C., via certified mail, return receipt requested, on the 13 day of August, 2002.

Respectfully submitted,

BRIAN S. CLARY & ASSOCIATES



BRIAN S. CLARY
TBA No. 04325100
402 Staitti
Humble, Texas 77338
(281) 548-1100, (281) 548-1126 fax

ATTORNEY FOR DEFENDANT
BIRD INCORPORATED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Certificate of Written Discovery was served pursuant to the Texas Rules of Civil Procedure, on or about the 13 day of August, 2002.



Brian S. Clary

NO. 90-23333

IN RE: ASBESTOS LITIGATION	§	IN THE DISTRICT COURTS
	§	
IN THE MASTER ASBESTOS FILE	§	HARRIS COUNTY, TEXAS

IN RE:	§	IN THE DISTRICT COURT
ALL ASBESTOS-RELATED	§	
PERSONAL INJURY OR DEATH	§	DALLAS COUNTY, TEXAS
CASES FILED OR TO BE FILED IN	§	
DALLAS COUNTY, TEXAS	§	68 TH JUDICIAL DISTRICT

NO. X-9999-999

IN RE: MASTER ASBESTOS FILE	§	IN THE DISTRICT COURTS
	§	
	§	JEFFERSON COUNTY, TEXAS

DEFENDANT BIRD INCORPORATED'S
SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION

Accompanying this supplement is an accumulation of documents that serve as a supplemental response to Defendant, Bird Incorporated's response to Request for Production. The documents are Bates Stamped "Bird 021472 to 022721" and represent documents retrieved from Bird's Charleston, South Carolina, manufacturing facility.

Respectfully submitted,

BRIAN S. CLARY & ASSOCIATES



BRIAN S. CLARY
TBA No. 04325100
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Humble, Texas 77338
(281) 548-1100
(281) 548-1126 Fax

**ATTORNEY FOR DEFENDANT,
BIRD INCORPORATED**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument and all enclosures have been served on the attorneys for Plaintiffs pursuant to the Texas Rules of Civil Procedure on the 13 day of August, 2002.

A handwritten signature in black ink, appearing to read 'B. Clary', is written above a horizontal line.

BRIAN S. CLARY