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CAUSE NO. 2000-05-1962-C

ROBERT HENRY VILLARREAL,
Individually and as Personal Representative
of the Heirs and Estate of JOHN HENRY
VILLARREAL

Plaintiffs,

vs.

GAF CORPORATION
HOLDINGS, INC.), ET AL.

Defendants.

§ IN THE DISTRICT COURT OF

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CAMERON COUNTY, TEXAS

197TH JUDICIAL DISTRICT

PLAINTIFF'S EXHIBIT

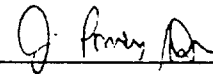
USG-560

DEFENDANT UNITED STATES GYPSUM COMPANY'S
FIRST AMENDED EXPERT WITNESS LIST

Defendant United States Gypsum Company's Expert Witness List to the above referenced
cases.

Respectfully submitted,

POWERS & FROST, L.L.P.

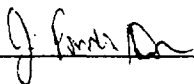


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**ATTORNEYS FOR DEFENDANT UNITED
STATES GYPSUM COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of Defendant United States Gypsum Company's Expert Witness List has been forwarded to Plaintiffs' counsel of record either by first class mail, return receipt requested, delivery or facsimile on this the 12th day of January, 2001.



**EXPERT WITNESS LIST OF DEFENDANT
UNITED STATES GYPSUM COMPANY**

LAWRENCE R. BIRKNER

Mr. Birkner is an experienced certified industrial hygienist with a background in evaluating the workplace for potential hazards with regard to work practices, measuring and evaluating exposures to various substances, and determining and controlling the nature and extent of health risk in occupational settings. Mr. Birkner may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and the evolution of knowledge in general and of United States Gypsum Company in particular regarding the effects of asbestos exposure and its control during time 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"), the OSHA PELs, and other levels for asbestos exposure.

Mr. Birkner may discuss the relationship between scientific knowledge and the development of public policy and standards relating to asbestos exposure, and all aspects of government regulation of asbestos exposure. Mr. Birkner may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters.

Mr. Birkner may comment about and/or respond to "expert testimony or opinion offered on behalf of plaintiff, including but not limited to testimony, if any, regarding the evolution of knowledge of the effects of asbestos exposure, standards and regulations applicable to asbestos exposure, with respect to the construction products industry and United States Gypsum Company

in particular, and testing done by or on behalf of plaintiff. Mr. Birkner may comment upon or analyze asbestos exposures described by plaintiff or his co-workers in this case.

FREDERICK M. TOCA

Dr. Toca is a certified industrial hygienist with a background in evaluating the workplace for potential hazards by analyzing work practices, measuring and evaluating exposures to various substances, and determining, then controlling the nature and extent of health risk in occupational settings. Dr. Toca may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and the evolution of knowledge in general and of United States Gypsum Company in particular regarding the effects of asbestos exposure and its control, the development of public policy and standards relating to asbestos exposure, and all aspects of government regulation of asbestos exposure during the time period relevant to this case. Dr. Toca may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters. He may also testify as to the development and utility of methodologies for identifying and measuring asbestos in air, dust and products, and the setting of threshold limit values ("TLVs"), the OSHA PELs, and other protective levels for asbestos exposure.

Dr. Toca may comment upon and/or respond to expert testimony or opinion offered on behalf of plaintiff in this case, including but not limited to testimony, if any, regarding state of the art, the evolution of knowledge of the effects of asbestos exposure, standards and regulations applicable to asbestos exposure, with respect to the construction products industry in general, and United States Gypsum Company in particular, and testing done by or on behalf of plaintiff. He

may comment upon or analyze asbestos exposures described by plaintiff or his co-workers in this case.

DR. ANDREW CHURG

Associate Professor
Chief, Laboratory of Anatomic Pathology
University of British Columbia
Health Sciences Center Hospital
2211 Westbrook Mall
Vancouver, B.C., Canada V6TFW5

Dr. Churg will testify about the pathology of asbestos related diseases, his research into asbestos related diseases, the carcinogenicity of various fiber types, and the relationship, if any, between asbestos and various diseases.

Dr. Churg is a specialist in the pathology of occupational lung disease. He is also expected to testify that some asbestos-containing products do not create a health hazard and that any asbestos exposure from these products played no role in the genesis of plaintiffs' lung diseases, if any.

Dr. Churg may testify, either live or by deposition, regarding general pathology and the pathology of plaintiffs. He may also testify as to any matter raised by experts called by plaintiffs or any co-defendants.

In addition, Dr. Churg may testify regarding general medical issues, including but not limited to the following:

1. the anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regards to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems;
2. the nature of asbestos and asbestos-related disease;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity;
4. the nature and extent of medical and scientific knowledge regarding any associations of obstructive pulmonary disease with asbestos fiber exposure;
5. 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;
6. methods of diagnosis of various diseases with other non-asbestos-related disease';
7. incidence of lung cancer among individuals with asbestos or asbestos exposure as compared to non-asbestos workers, non-asbestos exposed workers and to the general population.
8. cigarette smoking and its effects on the lungs and other organs;
9. the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect;
10. the difference between impairment and disability;
11. the effect of asbestosis or other asbestos-related disease, or asbestos exposure without asbestosis or other asbestos-related disease, on disability and life expectancy;
12. the lack of relationship between the presence of pleural plaques and a later development of any form of cancer;
13. the history of evolution and knowledge of asbestos-related diseases;
14. the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;
15. cancer incidence in the general population and among asbestos workers and its potential causes;
16. the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types and the cause of mesothelioma;
17. to the extent not covered above, asbestos medicine in general.

Dr. Churg will express his opinion that only established association concerning lung cancers and asbestos exposure is the association of asbestosis and lung cancers; that the association of occupational asbestos exposure and lung cancers is really the association of the specific disease, asbestosis and lung cancers; that only the confirmed presence of asbestosis establishes asbestos as a contributing cause of lung cancers in a person with a significant smoking history, that absent asbestosis, asbestos does not cause an increased risk of lung cancers. Dr. Churg may testify that occupational exposure to asbestos without a confirmed diagnosis of asbestosis provides no information about the cause of lung cancers and is not information supporting a conclusion that asbestos was a contributing factor in lung cancer. Dr. Churg may testify that pleural plaques, fiber burden counts and asbestos bodies also provide no information about the cause of lung cancers. Dr. Churg may testify as to what is asbestosis, whether there is an asbestos exposure threshold for asbestosis, what constitutes that threshold for asbestosis.

HANS WEILL, M.D.

Tulane University - School of Medicine
1700 Perdido Street
Second Floor
New Orleans, Louisiana 70112

Dr. Weill is a pulmonary specialist. Dr. Weill will testify generally about asbestos-related diseases and diseases of the lungs, chest, respiratory system and other organs of the body. He may offer general testimony relating to cigarette smoking, cancer of various organs, cancer risks associated with cigarette smoking, asbestos exposure and other causative factors, and the pathogenesis and diagnosis of disease, including asbestos related diseases. Dr. Weill may testify as to the various types of asbestos fibers and their role in the causation of disease. He may also

testily as to state-of-the-art medical as it relates to knowledge of health hazards associated with exposure to asbestos-containing dust in varying doses and in varying industries, based on his review of asbestos-related literature, and his own experience. Dr. Weill may testify specifically about plaintiffs' medical condition by relating these general principles to plaintiffs' or plaintiffs decedents' specific medical history through review of records, x-rays, or by hypothetical.

Dr. Hans Weill may testify, in general, concerning asbestos related diseases and the effects of exposure to asbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of an asbestos related disease. He may also testify regarding the existence or non-existence of any asbestos related disease in the plaintiffs, including, but not limited to pleural plaques, asbestosis, lung cancer, mesothelioma, laryngeal cancer, esophageal cancer and stomach cancer.

He may also testify on whether any asbestos related disease allegedly suffered by plaintiffs was medically or proximately caused by exposure to asbestos containing gasket and packing products. He may also testify on the existence of a dose response relationship between exposure to asbestos and asbestos related disease. He may also testify on increased risk of cancer issues and whether a particular plaintiff has a reasonable fear of cancer due to exposure of asbestos. He may also testify on the health consequences of smoking. With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other disease or conditions are present in plaintiffs.

Dr. Weill's testimony will be based on his training, experience, education, and review of the medical literature concerning asbestos related disease.

DR. JOHN E. CRAIGHEAD

Department of Pathology
University of Vermont
Burlington, Vermont 05405

Dr. Craighead is a pathologist at the University of Vermont. He will testify generally about the evolution of asbestos disease; the pathology of asbestos-related diseases including those named as "Non-Routine"; the "state-of-the-art" of asbestos-related diseases; and, will testify about other areas of pulmonary pathology including, but not limited to emphysema, carcinomas, and related matters.

Dr. Craighead will testify regarding the diagnosis and cause of plaintiffs' condition. He will discuss the differing physical, chemical and biological properties of various types of asbestos fibers, and will explain to the jury that chrysotile fibers are incapable of causing, or unlikely to have caused, plaintiffs' alleged condition. Dr. Craighead is expected to provide testimony in the following areas:

1. anatomy and function of the respiratory and circulatory systems and the diagnosis and treatment of disease affecting such systems;
2. the nature of asbestos and asbestosis;
3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneal and cavity;
4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;
5. 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;

6. methods of diagnosis of various diseases, particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases;
7. 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;
8. 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 items prepared for use or used for demonstrative purposes by any witness;
9. cigarette smoking and its effect on the lung and other organs;
10. the relative danger of these defendants' asbestos-containing products;
11. the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect;
12. difference between improvement and disability;
13. effort of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;
14. effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

DR. WILLIAM G. HUGHSON

UCSD Center for Occupational & Environmental Medicine
3500 Fifth Avenue, Ste. 102
San Diego, CA 92103-5020

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Hughson has not prepared a report in this case.

Dr. Hughson is board certified in pulmonology, internal medicine, and occupational medicine. Dr. Hughson also is an epidemiologist. Dr. Hughson practices medicine at the University of California, San Diego.

Dr. Hughson is board certified in pulmonology, internal medicine, and occupational medicine. Dr. Hughson also is an epidemiologist.

Dr. Hughson is expected to testify about certain encapsulated products (where the asbestos fibers are thoroughly blended and mixed with the encapsulating binder which prevents a significant release of fibers) in that he has reviewed information and studies regarding exposure levels experienced with certain work practices used with encapsulated products, and is familiar with the literature concerning low level exposures.

Dr. Hughson is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products was not a substantial contributing factor to plaintiffs' alleged asbestos-related disease. Dr. Hughson is expected to testify that the literature does not support a casual relationship between exposure to certain encapsulated products and the development of an asbestos-related disease. Dr. Hughson is expected to testify as to the ability of various types of fibers to cause disease and the properties of fibers that are believed to be necessary in order to cause disease.

Dr. Hughson is expected to testify generally about the pulmonary aspects of asbestos exposure, including matters such as dose response. Dr. Hughson is expected to testify about alleged occupational exposure and whether such exposure could be considered a substantial contributing factor to plaintiffs' alleged diseases.

Dr. Hughson is expected to testify about the principles of epidemiology and what is involved in an epidemiological study. He is expected to testify that studies of particular groups or

occupations of people are not necessarily applicable to other groups or occupations. Dr. Hughson is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease, and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Hughson is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual-

A copy of Dr. Hughson's C.V. will be made available upon request.

JANET HUGHES, Ph.D.

Tulane University Medical Center
Section of Environmental Medicine SL 1 5\
Bio Statistics
1430 Tulane Avenue
New Orleans, Louisiana 70112
(504) 588-5263

Dr. Hughes is expected to testify regarding the epidemiological and statistical analyses performed by herself and by others with respect to asbestos-related diseases.

ARTHUR LANGER, Ph.D.

Institute of Applied Sciences
Brooklyn College of the City University
New York, New York

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Langer has not prepared a report in this case.

Dr. Langer is a mineralogist with a Ph.D. from Columbia University. Dr. Langer is a Professor of mineralogy at City University, New York, New York, and director of the Environmental Sciences Laboratory of the Institute of Applied Sciences, Brooklyn College of the City University of New York.

Dr. Langer is expected to identify and describe the various methods by which inorganic material, from aerosols, bulk samples, or tissue, may be analyzed chemically, crystallographically, and structurally.

Dr. Langer is expected to testify about the various types of asbestos fiber, the geographic locations where the fibers can be found, the potential biologic activity of the various fibers in the human lung (including inorganic toxicity), the physical and chemical characteristics of the various asbestos fibers, and the identification and characterization of asbestos fibers.

Dr. Langer is expected to testify as to the types of inorganic minerals found in the lung tissue of persons with malignant mesothelioma and which are associated with the incidence of malignant mesothelioma in humans. Dr. Langer is expected to identify the types of fiber that have been shown to create an increased risk for malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of malignant mesothelioma.

Dr. Langer is expected to testify as to the potential for certain finished asbestos containing products to be contaminated with inorganic minerals and the amounts of the types of trace contaminants that may be found in the products. Dr. Langer is expected to offer testimony as to the amount of contaminants that are found in finished asbestos-containing products - if any - and the chemical, crystallographic, and structural composition of the contaminants. Dr. Langer

is expected to testify as to the levels of airborne contaminants that can be generated from a finished product if any.

Dr. Langer is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products did not result in a release of any contaminants sufficient to cause disease in persons such as plaintiff. Dr. Langer is expected to testify that his work, and the literature, do not establish that certain encapsulated products are contaminated with tremolite asbestos.

A copy of Dr. Langer's C.V. will be made available upon request.

DR. JAMES CRAPO

4650 South Forest Street
Englewood, CO 80110

The words and language used in this statement are the words and language of counsel who prepared the statement, and not of the witness. Dr. Crapo has not as yet prepared a report in this case, if he does, a copy will be provided to plaintiffs.

Defendants are not aware of all of the areas of testimony or proof that plaintiff intends to produce at trial and therefore cannot proffer all expected testimony until they have had the benefit of reviewing all of plaintiffs' expert's reports and opinions. To the extent that a witness expresses an opinion at trial or in discovery that has not been divulged prior to the time that this statement developing cancers. Dr. Crapo is also expected to testify about any matter raised by experts called by the Plaintiffs or Co-Defendants including, but not limited to, plaintiffs' medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases, including but not limited to, plaintiffs' medical condition, the state of

medical knowledge concerning asbestos, asbestos related disease and other occupational diseases.

DR. DORSETT SMITH

Seattle, Washington

Dr. Smith will testify about the pathology of asbestos related diseases, his research into asbestos related diseases, the, carcinogenicity of various fiber types, and the relationship, if any, between asbestos and various diseases. Dr. Smith will testify about the epidemiology of asbestos related diseases, latency, state-of-the-art, and other related matters. Dr. Smith will testify about case specific testimony, where applicable. He will testify about the evolution of asbestos disease, cigarette related diseases, and other respiratory or systemic conditions, specifically carcinomas, seen either of the foregoing. Dr. Smith will testify about the various fiber types of asbestos and, if necessary, about apportionment between product usage.

DOUGLAS FOWLER, Ph.D.

643 Blair Island Road, Number 305
Redwood City, California 94863

Dr. Fowler is an industrial hygienist who may testify live or by deposition concerning issues relating to plaintiffs theories of "fiber drift" issues relating to the threshold limit value, protective measures, plaintiffs' level of exposure to asbestos, and other industrial hygiene-related issues.

I. ALLEN FEINGOLD, M.D.

South Miami Hospital
7400 Southwest 62nd Avenue
Miami, Florida
(305) 661-4611, Ext. 5229

Dr. Feingold is the Chief of the Division of Pulmonary Medicine at South Miami Hospital. He will testify as a state-of-the-art witness generally and with respect to asbestos-containing products. He may also testify concerning the physiological and radiological aspects of asbestos-related lung disease, including etiology, diagnosis, treatment, prognosis and epidemiology; the causes of lung cancer, the history of the medical science concerning our knowledge and understanding of asbestos and asbestos-related disease; fiber types, dose/response and threshold levels needed to produce disease, the relationship of asbestos exposure to other environmental factors and their comparative risks. Dr. Feingold who also testify that work with some asbestos-containing products does not result in dangerous asbestos fibers exposure that any asbestos exposure from these products played no role in the genesis of plaintiffs' lung disease, if any.

In addition, Dr. Feingold is expected to testify about the various fiber release studies, performed at industrial hygiene laboratories, on the use of asbestos containing products.

Dr. Feingold may testify, in general concerning asbestos related diseases and the effects of exposure to asbestos upon persons in occupational settings, including the epidemiology of asbestos related diseases and the criteria for diagnosis of an asbestos related disease. He may also testify regarding the existence or non-existence of any asbestos related disease in the plaintiffs, including, but not limited to pleural changes, asbestosis, lung cancer, mesothelioma laryngeal cancer, esophageal cancer and stomach cancer. He may also testify on whether any asbestos

related disease allegedly suffered by plaintiffs was medically or proximately caused by exposure to asbestos containing gasket and packing products. He may also testify on a dose response relationship between exposure to asbestos and asbestos related disease. He may also testify on increased risk of cancer issues and whether a particular plaintiff has a reasonable fear of cancer due to exposure to asbestos. He may also testify on the health consequences of smoking.

DR. RUSSELL HARLEY

Musc-Pathology
Charleston, SC 29425

Dr. Harley is expected to provide testimony concerning the anatomic structure and functioning of the lung from a pathologies perspective, the defense mechanisms and functioning of the lung in health and otherwise, the responses of the lung to various stimuli and the role of various components of the respiratory system in the proper function of the lung. Dr. Harley is expected to describe and distinguish various types of asbestos fibers; to describe the things which affect the ability of asbestos to affect various structures within the respiratory system; and to describe the body's specific responses to fibers of asbestos that are inhaled, whether or not they are retained.

It is further believed that Dr. Harley will define and distinguish various conditions, such as asbestosis, pleural changes and other non-malignant changes that may be attributable in some persons to the results of long term inhalation and retention of some forms of asbestos fiber. Dr. Harley is further expected to be able to testify concerning the circumstances under which exposure to certain forms and types of asbestos may be associated with the incidence of some forms of mesothelioma in some persons, and will testify concerning the results of his own

experiences, the medical and scientific literature, and existing epidemiologic studies concerning associations that are alleged to exist epidemiologically between exposure to asbestos in some populations and the mortality and/or incidence of some forms of cancer.

Dr. Harley is further expected to offer testimony concerning the effects of inhaled tobacco smoke and other factors on the occurrence of disease in populations who are also alleged to be exposed to asbestos containing products, and additionally concerning how the effects of inhaled tobacco smoke and other factors can confound the apparent results of certain epidemiologic studies. Dr. Harley is also expected to testify that it cannot be said, to a reasonable degree of medical probability, that any hypothetical person's alleged "exposure" to products that may have contained asbestos was of importance to that individual, without reference to that specific person's individual work history, medical history, findings on physical examination and pathological examination of tissue, if any, information concerning the individual's use of protective equipment, specific types of asbestos contain product(s) used and/or handled, resolution of questions regarding exposures to substances other than asbestos-containing products, and other known etiologies for whatever conditions are found to exist.

It is further expected that Dr. Harley's testimony will generally respond to the pathologic, scientific and epidemiologic testimony which may be offered by plaintiffs' experts, and in that his testimony is dependent upon the prior testimony of such experts and cannot be specifically predicted.

In expressing his opinions, Dr. Harley will rely on his own training, education, experience, research and publications, as well as the published medical and scientific literature that has been available to him over his career.

Dr. Harley may testify as to the general medical aspects of the diagnosis and treatment of asbestos-related disease and the pathological effect of asbestos on the lung. He may also testify as to the relationship of asbestos exposure and the incidence of cancer.

SIDNEY SHINDELL, M.D., LLB

Medical College of Wisconsin
8701 Watertown Plank Road
Milwaukee, Wisconsin 53226
(414) 276-4974 – Home
(414) 456-4500 – Office

A. STATE OF THE ART:

Dr. Shindell is a physician. He will testify generally about the evolution of asbestos disease; the pathology of asbestos-related diseases including those named as "Non-Routine"; the state-of-the-art of asbestos-related diseases, and, will testify about other areas of pulmonary pathology including, but not limited to, emphysema, carcinomas, and related matters.

Dr. Shindell will testify about his personal experience in the development of the history of asbestos related medicine and the medical literature and his impressions of 1964 being a "watershed" as it relates to asbestos disease.

Dr. Shindell will testify regarding the differing physical, chemical and biological properties of various types of asbestos fibers, and will explain to the jury that chrysotile fibers are incapable of causing, or unlikely to have caused, plaintiffs' alleged condition-

B. MEDICAL TESTIMONY:

Dr. Shindell may provide testimony in the following areas:

1. anatomy and function of the respiratory and circulatory systems and the diagnosis and the treatment of disease affecting such systems;

2. the nature of asbestos and asbestosis;
3. the symptomatology, disease process and diagnosis of asbestos and cancer associated with the respiratory system, peritoneum and peritoneal cavity;
4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;
5. the effect of exposure to substances other than asbestos, such as tobacco, 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;
6. methods of diagnosis of various diseases, particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases;
7. 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;
8. 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;
9. cigarette smoking and its effect on the lung and other organs;
10. the relative danger of these defendants' asbestos-containing products;
11. the relationship of cigarette smoking to cancer of lung and cancers of other sites with reference to epidemiological studies and physiologic effect;
12. difference between impairment and disability;
13. effect of asbestos, or asbestos exposure without asbestos, on disability and life expectancy;
14. effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy;
15. the relative carcinogenicity of chrysotile asbestos relative to the other forms of asbestos.

C. THE ROLE OF CHRYSOTILE AS A CARCINOGEN FOR MESOTHELIOMA:

Dr. Shindell is expected to testify as to the ability of various types of fibers to cause disease and the properties of fibers that are believed to be necessary in order to cause disease. He is expected to testify that Chrysotile asbestos fibers are not expected to produce an increase risk to mesothelioma,

D. THE ROLE OF ENCAPSULATED PRODUCTS IN THE RELEASE OF ASBESTOS:

Dr. Shindell is expected to testify about certain encapsulated products (where the asbestos fibers are thoroughly blended and mixed with the encapsulating binder which prevents a significant release of fibers) in that he has reviewed information and studies regarding exposure levels experienced with certain work practices used with encapsulated products, and is familiar with the literature concerning low level exposures.

Dr. Shindell is expected to testify, based upon his review of the literature and of evidence of exposure that exposure to certain encapsulated products was not a substantial contributing factor to plaintiffs' alleged asbestos-related disease. Dr. Shindell is expected to testify that the literature does not support a causal relationship between exposure to certain encapsulated products and the development of an asbestos-related disease.

E. DOSE RESPONSE:

Dr. Shindell is expected to testify generally about the pulmonary aspects of asbestos exposure, including matters such as dose response. Dr. Shindell is expected to testify about alleged occupational exposure and whether such exposure could be considered a substantial contributing factor to plaintiffs' alleged diseases.

Dr. Shindell is expected to testify that as exposures to asbestos have diminished since the inception of the OSHA standards, the extent and number of cases of asbestosis have been and are expected to continue to diminish.

F. EPIDEMIOLOGY:

Dr. Shindell is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Shindell is expected to testify as to the information necessary to determine the risks for a group of people or persons contracting an asbestos-related disease and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Shindell is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the facts of a specific individual.

G. LUNG CANCER:

Dr. Shindell is expected to testify that cigarette smoking is the chief cause of lung cancer, that almost all of the lung cancers in America occur in present or ex-smokers, and that one cannot develop lung cancer related to asbestos exposure unless there is underlying asbestosis.

H. DEVELOPMENT OF MESOTHELIOMA:

Dr. Shindell is expected to testify that the earlier exposures to asbestos are, if sufficient, the principal cause of the disease and not later exposures.

Dr. Shindell is expected to testify that in at least 33% of mesotheliomas, asbestos exposure cannot be found.

WILLIAM DYSON

Workplace Hygiene
6518 Airport Parkway, Suite 203
Greensboro, NC 27409
(336) 931-0300

William Dyson is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respiratory history, what constitutes good hygiene practice, and the periods of time an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and government agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packing. He may testify as to exposure that may result from the use of asbestos products.

Mr. Dyson has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge skills, and training. Mr. Dyson may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify

concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-art. He will testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association, with the use of asbestos-containing products. He may testify about whether some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiffs alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any co-defendants. Mr. Dyson will testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Mr. Dyson may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Mr. Dyson may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr. Dyson will discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

DEFENDANT UNITED STATES GYPSUM COMPANY'S FIRST AMENDED LIST OF
POTENTIAL FACT/EXPERT WITNESSES AND DEPOSITION TESTIMONY

1. Howard J. Bowman, Retired Area Quality Manager, United States Gypsum Company, 125 South Franklin, Chicago, Illinois 60606.
2. Edwin Jakacki, Product Line Business Manager, Trowel Products & Plaster, United States Gypsum Company, 125 South Franklin, Chicago, Illinois 60606.
3. Custodian of Records, U.S. Gypsum Company, 125 South Franklin, Chicago, Illinois 60606.
4. Phillip Pratt via deposition.

Mr. Bowman and Mr. Jakacki would testify in regard to the manufacture, use, application and qualities of U.S. Gypsum Company products to which plaintiff alleges exposure. The Custodian of Records would be utilized to authenticate documents.

5. Lawrence R. Birkner, CIH, CSP, REA, M.B.A., Inc., 2026 El Monte Drive, Thousand Oaks, CA 91362, Telephone (805) 494-8173.

Mr. Birkner is an experienced certified industrial hygienist with a background in evaluating the workplace for potential hazards with regard to work practices, measuring and evaluating exposures to various substances, and determining and controlling the nature and extent of health risk in occupational settings. Mr. Birkner may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and the evolution of knowledge in general and of United States Gypsum Company in particular regarding the effects of asbestos exposure and its control during time 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"), the OSHA PELs, and other levels for asbestos exposure.

Mr. Birkner may discuss the relationship between scientific knowledge and the development of public policy and standards relating to asbestos exposure, and all aspects of government regulation of asbestos exposure. Mr. Birkner may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters.

Mr. Birkner may comment about and/or respond to expert testimony or opinion offered on behalf of plaintiff, including but not limited to testimony, if any, regarding the evolution of knowledge of the effects of asbestos exposure, standards and regulations applicable to asbestos exposure, with respect to the construction products history and United States Gypsum Company in particular, and testing done by or on behalf of plaintiff.

Mr. Birkner may comment upon or analyze asbestos exposures described by plaintiff or his co-workers in this case.

6. Frederick M. Toca, Atlantic Environmental, Inc., 2 E. Blackwell Street, Dover, New Jersey 07801, Telephone: (973) 366-4660.

Dr. Toca is a certified industrial hygienist with a background in evaluating the workplace for potential hazards by analyzing work practices, measuring and evaluating exposures to various substances, and determining, then controlling the nature and extent of health risk in occupational settings. Dr. Toca may testify as to the state of the art with respect to asbestos in the field of industrial hygiene, and the evolution of knowledge in general and of United States Gypsum Company in particular regarding the effects of asbestos exposure and its control, the development of public policy and standards relating to asbestos exposure, and all aspects of government regulation of asbestos exposure during the time period relevant to this case. Dr. Toca may testify about the development of knowledge regarding the dose-response relationship between exposure to asbestos and disease, and other related matters. He may also testify as to the development and utility of methodologies for identifying and measuring asbestos in air, dust and products, and the setting of threshold limit values ("TLVs"), the OSHA PELs, and other protective levels for asbestos exposure.

Dr. Toca may comment upon and/or respond to expert testimony or opinion offered on behalf of plaintiff in this case, including but not limited to testimony, if any, regarding state of the art, the evolution of knowledge of the effects of asbestos exposure, standards and regulations applicable to asbestos exposure, with respect to the construction products industry in general, and United States Gypsum Company in particular, and testing done by or on behalf of plaintiff. He may comment upon or analyze asbestos exposures described by plaintiff or his co-workers in this case.