PLAINTIFF'S EXHIBIT

TEX-24

NO. 12902-BH00

ODIS BRYANT WITHERS AND RUBY WITHERS	§	IN THE DISTRICT COURT OF
	§	
	§	BRAZORIA COUNTY, TEXAS
VS.	§	
	§	
GAF CORPORATION, ET AL.	§	23RD JUDICIAL DISTRICT

DEFENDANT TEXACO INC.'S 9/18/01 SUPPLEMENTAL DESIGNATION OF EXPERTS AND PERSONS WITH KNOWLEDGE OF RELEVANT FACTS SUBJECT TO MOTION TO TRANSFER VENUE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant **TEXACO INC.**, and hereby supplements its responses to Interrogatories and Request for Disclosure regarding expert witnesses, trial witnesses and persons with knowledge of relevant facts, as follows:

1. Charles Blake
Clayton Group, Inc.
3800 Chastain Meadows Parkway
Kennesaw, Georgia 30144
Phone: 770-499-7500

Mr. Blake has knowledge of monitoring performed on asbestos cement sheet products such as transite as well as other asbestos containing products and has knowledge of the fiber type of asbestos in these products. Mr. Blake's testimony is primarily factual in nature; however, to the extent that the same may be deemed to be opinion testimony, he is designated as an expert witness as well. Attached is a copy of his C.V.

Respectfully submitted,

HAYS, McCONN, RICE & PICKERING

BY: _____

B. Stephen Rice
TSB No. 16838000
1200 Smith Street, Suite 400
Houston, Texas 77002
713-654-1111
713-655-9212-fax

Attorney for Defendant TEXACO INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to counsel for Plaintiff by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this 19th day of Sept, 2001.

B. Stephen Rice

Clayton GROUP SERVICES

Charles L. Blake, CIH
Vice President, Director, Technical Services

Area of Expertise

Experienced in aspects of industrial hygiene practice, consultation, and program management and research. Proficient as an expert witness in industrial health, toxic tort and environmental liability matters. Maintains specific expertise in asbestos, pesticides, crystalline silica, ethylene oxide, carbon monoxide, and hazardous materials handling, control, and abatement matters.

Education

B.S., Chemical Engineering
Worcester Polytechnic Institute, 1967
Worcester, Massachusetts

Professional Registration/Certification

Certified Industrial Hygienist, ABIH, No. 1242 (Comprehensive Practice)

AHERA Accredited Asbestos Management Planner, Certificate No. 1621

AHERA Accredited Building Inspector, Certificate No. 2185

Commercial Pilot rated for instrument flight in single and multi engine aircraft, 3,000 hours flight experience

Professional Experience

Clayton Group Services, Inc.
Kennesaw, Georgia
1981 to Present

As Vice President, Director Technical Services, responsible for special projects development, performance, technical and administrative coordination; business activities, technical direction, staff development, and supervision, for this regional industrial hygiene and environmental consulting practice

Professional Experience (Continued)

- Performs detailed industrial hygiene and environmental surveys, audits, and studies.
- Evaluates and designs manufacturing/processing facilities, formulation equipment, ventilation, and emission control systems, for the metals and chemical processing industries.
- Selects, makes recommendations, and performs tests for use of personal protective equipment.
- Researches and develops technical data and provides expert testimony in occupational and environmental health-related litigation.

Clayton Environmental Consultants, Inc.
Southfield, Michigan
1978 to 1981

As Group Leader, Assistant Manager of Industrial Hygiene Services, responsible for staffing, scheduling, and administrative activities.

- Performed detailed industrial hygiene and environmental surveys, audits, and studies.

Helena Chemical Company
Memphis, Tennessee
1973 to 1978

As Corporate Staff Engineer, responsible for engineering, environmental health and safety activities and related compliance efforts.

- Directed the design and construction of seven separate pesticide formulation plants, and numerous manufacturing, packaging, ventilation, and emission control systems.
- Developed and designed hazardous waste treatment facilities for formulating and manufacturing plants.
- Performed industrial hygiene surveys, developed, and implemented in-house procedures and employee health standards.
- Represented Helena Chemical by serving on various committees within the National Agricultural Chemical Association. Participated in numerous standards writing activities.

Professional Experience (Continued)

Aetna Insurance Company
Hartford, Connecticut
1972 to 1973

As Chemical Engineer Industrial Hygienist, served as final engineering authority for underwriting and claim departments.

- Conducted industrial hygiene surveys.
- Provided complete engineering and industrial hygiene support. Assisted underwriting expansion into the asbestos floor tile, foundry, organic chemical, and natural gas.

E.I. DuPont de Nemours & Co., Inc.
Chattanooga, Tennessee
1967 to 1971

As a Process Engineer, responsible for operation and development of a continuous process nylon production system.

Military Service

United States Army 1968 to 1970

- Attained rank of Captain
- Served in Republic of Viet Nam in positions ranging from maintenance shop officer to Battalion S-4.

Professional Affiliations

American Industrial Hygiene Association
Georgia Section Past Treasurer

American Insurance Association
Chemical and Special Hazards Committee

Professional Affiliations (Continued)

National Agricultural Chemicals Association
OSHA Committee
Effluent Guidelines Subcommittee

National Asbestos Council
Past Director
Past Treasurer
Sampling and Analytical Committee
Past Chairman Survey and Specification Committee

Honors/Awards

Pi Delta Epsilon (Journalism) and Scabbard and Blade (Military) Honor Societies

Awarded Bronze Star for U.S. Army Service in Republic of Viet Nam

Publication/Presentations

Indoor Air Quality Problems in Public Buildings, C.L. Blake, M.A. Coffman, and D.J. Heywood, presented at the American Industrial Hygiene Conference, Portland, OR, May 1981.

Exposures During Paint Spraying in Lateral Flow and Downdraft Auto Repair Shop Paint Spray Booths, A.W. Eissler, C.L. Blake, presented at the American Industrial Hygiene Conference, Portland, OR, May 1981.

A Discussion of Six Indoor Air Quality Studies in Public Buildings, D.H. Montgomery, C.L. Blake, J. Singh presented at the American Industrial Hygiene Conference, Cincinnati, OH, June 1982.

An Investigation of Health Concerns and Environmental Measurements in a Large Office Building, M.S. Levine, M. Corn, C. Billings, Johns Hopkins University; J.Singh, C.L. Blake, Clayton Environmental Consultants, Inc., presented at the International Symposium on Indoor Air Pollution, Health and Energy Conference, Amherst, MA, October 1981.

Removal of Asbestos from Public Buildings, C.L. Blake, presented at the Joint Conference on Occupational Health, Salt Lake City, UT, September 1984.

Clayton GROUP SERVICES

Publication/Presentations (Continued)

Confining and Minimizing Airborne Fibers, C.L. Blake, delivered at the Georgia Tech Research Institute Asbestos Symposium, Atlanta, GA, March 1983.

Asbestos Materials in Buildings, Operations & Maintenance Planning, delivered at the University of South Carolina, Columbia, SC, October 1983.

An Evaluation of the Garrett TPE 331 Engine's Potential for Turbine Oil By-Product Contamination of An Aircraft Cabin Environmental System, National Transportation Safety Board Special, Investigation Report #NTSB/SIR-84/01, January 1984, Note: Mr. Blake was lead investigator for Clayton Environmental Consultants, Inc's. contribution to this report.

Prevalent Level, Personal and Area Air Monitoring, delivered at the Georgia Tech Research Institute Asbestos Symposium, Atlanta, GA, August 1984.

Asbestos, Hidden Hazards, delivered at Georgia Institute of Technology, Graduate School of Civil Engineering, Atlanta, GA, January 1985.

A Study of Contamination of Jet Powered Aircraft Cabin Environments, delivered at American Industrial Hygiene Association (AIHA) Georgia Section Meeting, Atlanta, GA, January 1985.

Monitoring Pressure Differentials on Asbestos Abatement Projects, delivered at the Georgia Institute of Technology Asbestos Symposium, Atlanta, GA, March 1986.

Asbestos Abatement and Removal: Legal Considerations and Planning, presented with Lloyd Fox, Esq. at Engineering News Record Seminar, Washington, DC, November 1986.

Air Sampling Analysis Procedures, Air Sampling Methods and Procedures, delivered at the American Wall and Ceiling Institute, Asbestos Abatement World Congress, Washington, DC, January 1987.

Regulatory Update: Federal and State Asbestos Requirements, delivered at the Georgia Tech Institute Asbestos Symposium, Atlanta, GA, March 1987.

Achieving Compliance with OSHA Standards, delivered at the Georgia Tech Research Institute, Brake and Clutch Seminar, Atlanta, GA, August 1987.

Publication/Presentations (Continued)

AHERA: Selecting Response Actions, delivered at Georgia Tech Research Institute, AHERA Inspection and Management Planner Certification Course, Atlanta, GA, November 1987.

AHERA: Evaluating and Implementing Response Actions, delivered at Georgia Tech Research Institute AHERA Seminar for LEA Representatives, Atlanta, GA, February 1988.

Environmental Liability: New Chemical Regulations, delivered to the Risk and Insurance Management Society, Inc., Piedmont Chapter, Greensboro, NC, March 1988.

Asbestos in Buildings, delivered to the Institute for Real Estate Management, Orlando, FL, April 1988.

Insights Regarding Asbestos Litigation, delivered to BKR International, Atlanta, Georgia, September 1993.

Asbestos Exposure of Building Maintenance Personnel, Mlynarek, S., Corn, M., Johns Hopkins University, Blake, C.L., Clayton Environmental Consultants, Inc., *Regulatory Toxicology and Pharmacology*, Volume 23 #3, June 1996.

Taking the Client Where They Need (Rather Than Want) to Go. Leadership Roles in Consulting, delivered at the Professional Conference on Industrial Hygiene, New Orleans, Louisiana, September 1999.

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September 18, 2001

Mr. Jerry Deere
BRAZORIA COUNTY DISTRICT CLERK
111 E. Locus Street, Room 400
Angleton, TX 77515

Re: Cause No. 12902-BH00; ***Odis Bryant Withers and Ruby Withers v. GAF Corporation, et al.***; In the 23rd District Court of Brazoria County, Texas

Dear Sir:

Please find enclosed for filing in the above-referenced matter the following:

1. **Defendant Texaco Inc.'s 9/18/01 Supplemental Designation of Experts and Persons With Knowledge of Relevant Facts Subject to Motion to Transfer Venue.**

Please indicate the time and date of filing by placing your file stamp on the attached copy and returning same in the envelope provided. By copy of this letter, all counsel of record will be furnished with a copy of same.

Thank you for your assistance in this matter.

Sincerely yours,

HAYS, McCONN, RICE & PICKERING

B. Stephen Rice

BSR/kbg
Enclosures

cc: Stephanie Finch
CM/RRR
(with enclosure)

cc: All other known defense counsel
(with enclosure)

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