

FILE NAME: Oil Industry and American Petroleum Institute (API)

DATE: 1992

DOC#: API072

DOCUMENT DESCRIPTION: Legal - Plaintiff's Amended Notice of Intent to Take Deposition of H.H. Zuidema

	B-126,986	
RUSSELL ALLEN, ETAL.	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
AMERICAN PETROFINA, ETAL.	§	60TH JUDICIAL DISTRICT
	A-134,614	
FRENCH HICKS, ETAL.	§	IN THE DISTRICT COURT
VS.	§	JEFFERSON COUNTY, TEXAS
BETHLEHEM STEEL CORP., ETAL.	§	58TH JUDICIAL DISTRICT
	B-141,242	
ROOSEVELT SCOTT	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
AMERICAN OPTICAL CORP., ETAL	§	60TH JUDICIAL DISTRICT COURT
	A-138,633	
MARGARET FAULKNER, ETAL	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
AKRON CHEMICAL CO., ETAL	§	58TH JUDICIAL DISTRICT
	A-136,143	
KEITH GIBLIN, ETAL	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
MOBIL OIL CORPORATION, ETAL	§	58TH JUDICIAL DISTRICT
	E-141,216	
JOSEPH E. BARNARD, ET UX	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
ALLIED-SIGNAL INC., ETAL	§	172ND JUDICIAL DISTRICT
	A-140,498	
JOYCE A. BORNE, ETAL	§	IN THE DISTRICT COURT OF
VS.	§	JEFFERSON COUNTY, TEXAS
ALLIED-SIGNAL INC., ETAL	§	58TH JUDICIAL DISTRICT

PLAINTIFFS' AMENDED NOTICE OF INTENT TO TAKE VIDEO DEPOSITION OF
H. H. ZUIDEMA
WITH
SUBPOENA DUCES TECUM

TO: ALL DEFENDANTS, by and through their attorney of record.

PLEASE TAKE NOTICE that on SEPTEMBER 1, 1992, beginning at 2:00 p.m. and continuing SEPTEMBER 2, 1992 beginning at 10:00 a.m. and from day to day until completed, the Plaintiffs in the above styled and numbered cause will take the Oral Deposition of H. H. ZUIDEMA at Hendersonville Holiday Inn, 201 Sugar Loaf Road, Hendersonville, NC 28739.



A Certified Shorthand Reporter from the firm of Charlotte Smith Reporting will report the depositions. The Court Reporter is hereby requested to issue and serve a subpoena for the production of said witness and documents at his address, to-wit: 10 Quail Trail, Hendersonville, North Carolina 28792. The deponent is hereby requested to bring the following documents to his deposition.

- (1) Curriculum Vitae;
- (2) Documents relating to proposed or conducted studies of occupational disease in chemical plant, construction, or refinery workers.
- (3) Documents relating to toxicological reviews or testing (excluding underlying data);
- (4) Documents relating to studies concerning occupational pneumoconioses and occupational carcinogens and tumors, including epidemiology studies, mortality studies, and morbidity studies;
- (5) Documents relating to occupational health or safety practices or standards;
- (6) Documents reflecting meetings activities or communiques of any persons concerned with worker health or safety, acting on their employer's behalf or under the auspices of any of the following groups or organizations:

ACGIH, Air Hygiene Association, American Petroleum Institute, ANSI (formerly American Standards Association), Chemical manufacturer's Association or Manufacturing Chemists Association, Industrial Hygiene Foundation, Louisiana Chemical Counsel, National Petroleum Refiners Association, National Safety Counsel, Texas Chemical Counsels; and

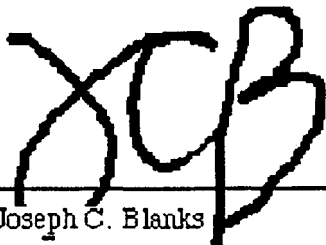
- (6) Industrial hygiene and occupational medicine texts, articles, or treatises published before 1965.

"DOCUMENT" means all writings of any kind, including written, recorded or graphic matter, however produced or reproduced. It includes all matter that relates or refers in whole or in part to the subjects of these interrogatories or production requests or requests for admission. If the document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reason of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each nonidentical copy is a separate "document". "FORM DOCUMENTS" means a document prepared as a matter of repetitive routine under a procedure (such as the use of printed blank forms) which eliminates the necessity of repeated production or reproduction of information that remains the same in the whole series of form documents. The term "DOCUMENT" includes, without limitation, correspondence, personal and interoffice memoranda, notes, diaries, statistics, letters, telexes, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and intraoffice communications, offers, notations or memoranda or any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, invoices, recordings, worksheets, work papers, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing.

You are invited to attend and cross-examine.

Reaud, Morgan & Quinn
Attorneys for Plaintiffs
801 Laurel Street
Beaumont, Texas 77701
(409) 838-1000
Fax: 832-8236
Tex. Bar No. 02456770

Respectfully submitted,



Joseph C. Blanks

CERTIFICATE OF SERVICE

I served a true copy of the above on all attorneys of record per Attachment A on August 27, 1992 by telecopier or first class mail, CRRR.



HALEY, DAVIS, WREN, BRISTOW & RASNER
Les Palmer

HAYS, MCCONN, RICE & PICKERING

Amoco Chemical Co.
Amoco Corp.
Amoco Oil Co.
BASF Corporation
Chevron Chemical Company
Chevron U.S.A.
Cities Serv. Oil and Gas Corp.
a/k/a OXY USA
Conoco
Crown Central Petro Corp.
Eastman Kodak Company
Ethyl Corporation
Exxon Corporation
Gulf Oil Corporation
Hoechst Celanese Chem. Group
Humble Oil and Refining Corp.
Humble Oil and Refining Corp.
Lubrizol Corp.
Marathon Oil Co.
Phillips 66
Phillips Chemical Company
Phillips Petroleum Company
Pure Oil Corp.
Rohm and Haas Bayport
Rohm and Haas Texas, Inc.
Shell Oil Company
Star Enterprise
Sun Oil Company
Temple-Inland Forest Prod.
Tenneco Oil Co.
Texaco Chemical Co.
Texaco Chem. Intl Trader
Texaco Refining & Marketing
Texas City Refining, Inc.
Union Oil Co. of California
Unocal Corp.
B. Stephen Rice
Ronald T. Hancock

HIRSCH, GLOVER, ROBINSON & SHEINESS
Lisa A. Ketai

HOLMES & HARRIS, P.C.

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Texasgulf, Inc.
Paul J. Holmes
HOLTZMAN & URQUHART
manville Personal Injury Settlement Trust
Mobay Corporation
a/k/a Miles
Sharla J. Frost
James L. Moore
Joyce Margatze
HOYT, COLGAN & ANDREU
Jim Walter Corporation
Michael Colgan

WAYNE DAVIDSON & ASSOCIATES
Wayne Davidson

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Pittsburg Corning Corp.
Triplex, UInc.
Edward Green
R. Lyn Stevens
Mike Walzel
Mitch Toups

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HUNT & CRAWFORD
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Firestone Tire and Rubber
Boyd Wells
Walter Crawford, Jr.

WOMBLE & SPAIN
Caterpillar, Inc.
W. T. Womble

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Monsanto Company
Edward M. Carstarphen

DINSMORE&SHOHL

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Michelle E. Gillespy-Goldstein
Jerry S. Sallee
Gerald V. Weigle, Jr.

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E. I. Dupont De Nemours & Co.
PPG Industries, Inc.
Robert Adams
Pedro Andarsio
Charles R. Dunn
Jerry Kacal

EDWARDS&CALVERT

James B. Edwards

ELLISON, SCHWEINLE, PARISH&BEERBOWER

American Petroleum Institute
Chemical Manu. Assoc.
National Petro. Ref. Assoc.
Texas Chemical Council
William Schweinle, Jr.

EVANS&EVANS

Rock Wool Manufacturing Co.
Richard N. Evans

FAIRCHILD, PRICE, RUSSELL, THOMAS
ANDHALEY

J.T. Thorpe Company
Thorpe Insulation Service Co.
Thorpe Insulation Company
Thorpe Products
C. Victor Haley
W. Miller Thomas

FIEDLER FIRM

Industrial Chemicals Co.
Scott Weber

FULBRIGHT&JAWORSKI

Todd Shipyards Corporation
Chris Hart
Dale L. Trimble

FUNDERBURK&FUNDERBURK, L.L.P.

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Ryan Beason

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GIESSEL, STONE, BARKER&LYMAN

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Steve Ferrell
Russell Wasley

GOODING&DODSON

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Robert Dodson
Frank A. Poff

RIENSTRA, DOWELL&FLATTEN

Liberty Mutual Insurance Co.
Ransburg Corporation
Dale Dowell

ROBERTS, MARKEL, FOLGER&POWERS

Fibreboard Cororation
The Aber Company
James H. Powers

RYAN&WINCHESTER

Lance Winchester - Att: Zadra

SMITH, SHEW & SCRIVNER

Michael G. Smith

STOREY, ARMSTRONG, STEGER&MARTIN

Robert M. Martin, Jr.

STRASBURGER&PRICE

Travelers Insurance Company
Jerry Beane

STRONG, PIPKIN, NELSON& BISSELL

Owens-Illinois, Inc.
John Bissell
David Starnes
David Ledyard
William B. Coffey, Jr.

TAYLOR&EGGLESTON

Thomas B. Taylor

TEKELL, BOOK, MATTHEWS&LIMMER

Triple B corporation
Brake Parts, Inc.
Mike Decker
Michele Taylor

TUCKER, HENDRYX&GASCOYNE

H.K. Porter Company, Inc.
Mannington Mills, Inc.
Michael Hendryx

VIAL&HAMILTON

A. M. F., Inc.
B & B Engineering & Supply
Ms. Lee Bartlett
Mark Hendrix

VINSON&ELKINS L.L.P.

Steven L. Russell
Allied-Signal, Inc.
Danny Van Winkle

BENCKENSTEIN, OXFORD & JOHNSON

American Bridge, Inc.
Dresser Industries, Inc.
M.H. Detrick Company
Rubber Manufacturers Assoc.
United States Steel Corp.
USX Corporation
Magnetek, Inc.

Mike Jamail
Ned Johnson
Hubert Oxford
William Tolin, III

BOSWELL & HALLMARK

John T. Valentine

BUTLER & BINION

Carey Canada, Inc.
Celotex Corporation
Bob Arredondo
Thomas Taylor

COWLES & THOMPSON

Fuller Austin Insulation Co.
Warren Austin Gage

CRAIN, CATON & JAMES
Crown Cork & Seal Company
Frank G. Harmon, II

DAVIS & SHANK

Andrew S. Oretsky
DEHAY & BLANCHARD
Amchem Products Inc.
A.P. Green Industries, Inc.
Armstrong World Industries
Flexitallic, Inc.
Gaf Corporation
National Gypsum Company
Union Carbide Corporation
United States Gypsum Co.
Lewis Miltonberger
Gary D. Elliston

NIEMEYER, NOLAND & ALEXANDER

John C. Niemeyer

ORGAIN, BELL & TUCKER

Arco Chemical company
Atlantic Richfield Company
Chevron U.S.A., Inc.
Gulf States Utilities Co.
Lubrizol Corporation
Monsanto Company
Neches Butane, Inc.
Occidental Chemical Corp.
Pure Oil Corp.
Sun Oil Company
Temple-Eastex, Inc.
Temple-Inland, Inc.
Union Oil Company of Calif.
Unocal Corp.
USI Chemicals Co., Inc.
a/k/a Quantum Chemical
James H. Chestnut, II
D. Allan Jones
Louis Knabeschuh, Jr.
J. B. Whittenburg
General Motor Corporation
Navistar International Transportation Corp.
John W. Newton, III

PATE & DODSON

Kentile Floors
Joe Michael Dodson

**PATTERSON, LAMBERTY, STANFORD,
WALLS & DWYER, INC.**

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Congoleum Corporation
Kathryn Hermes
PAULI & GRIFFIN
Timothy J. Hogan
PHILLIPS & AKERS
Uniroyal, Inc.
Kurt Groten
Parmelee Industries, Inc.
Andrew T. McKinney, IV

ATTACHMENT A

Attorneys of Record in all Cases

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Mary S. Gibson

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ANDREWS&KURTH

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Air Products & Chemicals
Andrew Hanen
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BAILEY&WILLIAMS

C. Edward Fowler, Jr.

BAKER & BOTTS

American Cyanamid
BP Oil Company
Goodyear Tire & Rubber Co.
Houston Lighting & Power
Velsicol Chemical Corp.
Richard Josephson
Lori Stiffler
Glendale Protective Technologies, Inc.
David Poage

BANKSTON&MCDOWELL

Beth McCahill

BEAN&MANNING

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Owens-Corning Fiberglas Corp.
William Cozort
Jack B. Manning

BENCKENSTEIN,NORVELL,BERNSEN&NATHAN

American Petrofina, Inc.
American Petrofina of Texas
Fina Oil & Chemical, Co.
Jim Walter Corporation
Mobil Chemical Company
Mobil Mining & Minerals
Mobil Oil Corporation
Western Auto Supply Company
Gail C. Jenkins
David E. Grove

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Douglas Koger

LIDDELL,SAPP,ZIVLEY,HILL&LABOON

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John Hill

MARTIN,HERRING&FJELDAL

Flexco Products, Inc.
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W.R. Grace & Company
Arthur R. Almquist
Chrysler Corporation
Deere & Company
Ford Motor Company
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MEYER,KNIGHT&WILLIAMS

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