PLAINTIFF'S EXHIBIT

RMC-660

NO. S-98-5033CV-C

FAY MOORE, Individually and as Personal Representative of the Heirs and Estate of Leo Moore, Deceased,	§	**IN THE DISTRICT COURT**
Plaintiffs,	§	
v.	§	**SAN PATRICIO COUNTY, TEXAS**
REYNOLDS METALS COMPANY, et al.,	§	
Defendants.	§	**343RD JUDICIAL DISTRICT**

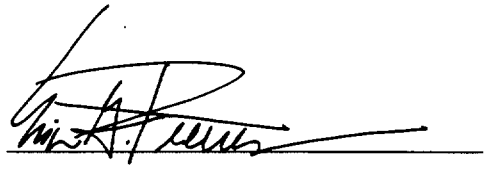
DEFENDANT REYNOLDS METALS COMPANY'S
MASTER CONSOLIDATED PRIVILEGE LOG

Defendant Reynolds Metals Company, by and through counsel, attaches its Master Consolidated Privilege Log covering all document productions in *Pollock v. Reynolds Metals* Company, Cause No. 97-58382, in the District Court of Harris County, Texas, 127th Judicial District; *Garrett, et al v. Owens-Corning Fiberglas Corp. et al*, Cause No. 95-01915-J, in the District Court of Dallas County, Texas, 191st Judicial District; and *Tiner v. Reynolds Metals Company*, Cause No. 94-03884-B, in the District Court of Nueces County, Texas, 117th Judicial District. This privilege log replaces and supersedes all privilege logs previously produced in those matters.

CERTIFICATE OF SERVICE

I hereby certify that on the 25TH day of May, 2001, a true and correct copy of the foregoing instrument has been served upon Plaintiff's counsel, by overnight delivery, at the following address:

Stephanie A. Finch, Esq.
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219



REYNOLDS METALS COMPANY

By: _____

David Craig Landin (Texas Bar No. 11863720)
John D. Epps (Texas Bar No. 00796079)
Lori E. Guzman(Texas Bar No. 24011471)
Eric G. Reeves (Texas Bar No. 24026170)
HUNTON & WILLIAMS
951 East Byrd Street
Riverfront Plaza, East Tower
Richmond, Virginia 23219
(804) 788-8200
(804) 788-8218 (facsimile)

R. Clay Hoblit (Texas Bar No. 09743100)
Jaime L. Capelo, Jr. (Texas Bar No. 03774800)
Adam Cortez (Texas Bar No. 04844650)
CHAVES, GONZALES & HOBLIT, L.L.P.
2000 Frost Bank Plaza
202 North Carancahua
Corpus Christi, Texas 78470
(361) 888-9392
(361) 888-9187 (facsimile)

DEFENDANT REYNOLDS METALS COMPANY'S
MASTER CONSOLIDATED PRIVILEGE LOG

***Tiner v. Reynolds Metals Company*,**
Cause No. 94-03884-B, in the District Court of Nueces County, Texas, 117th Judicial District

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0000013-RMC0000019	Memorandum with attachments	H Cole, Law Department, and other RMC personnel	J Donohue Law Department	05/18/84	Legal Department memorandum with analysis of company guidelines	Attorney-Client
RMC0000020-RMC0000025	Memorandum with attachments	H Cole, Law Department and other RMC personnel	J Donohue Law Department	05/16/84	Legal Department memorandum with analysis of company guidelines	Attorney-Client
RMC0000026-RMC0000027	Draft Bulletin	N/A	N/A	05/16/84	Draft company guidelines with request for legal analysis	Attorney-Client
RMC0000028-RMC0000035	Memorandum	H Cole and other RMC personnel	J Donohue Law Department	05/01/84	Legal Department memorandum with analysis of company guidelines	Attorney-Client
RMC0000328-RMC0000331	Memorandum	H Cole	R Krotseng Law Department	09/26/83	Draft legal memorandum	Attorney-Client
RMC0000332-RMC0000339	Memorandum with attachment	P Laden Law Department	H Cole	09/12/83	Memorandum requesting legal advice	Attorney-Client
RMC0002811-RMC0002816	Memorandum with attachment	J Donohue, Law Department and other RMC personnel	H Cole	10/07/86	Draft company policy with request for legal analysis	Attorney-Client
RMC0002817-RMC0002822	Memorandum with attachment	B Mallinger and other RMC personnel	H Cole	10/07/86	Draft company policy with request for legal analysis	Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0002823-RMC0002828	Memorandum with attachment	J Donohue and other RMC personnel	H Cole	10/07/86	Draft company policy with request for legal analysis	Attorney-Client
RMC0002829-RMC0002840	Memorandum with attachment	H Cole	P Laden Law Department	09/27/86	Legal Department Memorandum with analysis of draft company policy	Attorney-Client
RMC0002841	Memorandum	P Laden Law Department	H Cole	09/16/86	Request for legal analysis	Attorney-Client
RMC0003135	Memorandum	Law Department and other RMC personnel	B Mallinger Law Department	10/20/86	Legal opinion re. standard contract language	Attorney-Client
RMC0003173	Memorandum	H Cole D Mortimer	J Donohue Law Department	03/14/84	Legal department memorandum with comments upon revisions to company guidelines	Attorney-Client
RMC0003174-RMC0003176	Draft Memorandum with handwritten notation	N/A	Law Department	04/30/84	Handwritten legal analysis of revisions to company guidelines	Attorney-Client
RMC0003177-RMC0003179	Memorandum	H Cole D Mortimer	Law Department	02/24/84	Legal department memorandum with comments upon revisions to company guidelines	Attorney-Client
RMC0003181	Redacted Document	Plant Managers, Law Department	T Brown	03/29/83	Redaction of paragraph re: Company reporting requirements adopted in anticipation of possible litigation or regulatory action	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0006572; RMC0006578, RMC0006588, RMC0006594; RMC0006600	Handwritten notes	N/A	N/A	Undated	Handwritten notes reflecting legal strategy	Work Product/Attorney-Client
RMC0014458	Memorandum with attachments	J Donohue, Law Department and other RMC personnel	B Mallinger Law Department	04/13/92	Transmittal of information about pending litigation	Work Product/Attorney-Client
RMC0014472	Memorandum with attachment	Law Department and other RMC personnel	Law Department	02/14/91	Transmittal of information about pending litigation	Work Product/Attorney-Client
RMC0016073-RMC0016074	Memorandum with attachments and handwritten notes	L Tropea	H Cole	Various	Memorandum and notes re legal strategy for litigation	Work Product/Attorney-Client/Party Communication
RMC0014758	Memorandum	H Cole L Tropea	J McKinnon Law Department	06/14/89	Legal opinion re legislation	Attorney-Client
RMC0016082-RMC0016107	Memorandum with attachment	J Bryant and other RMC personnel	R Krotseng Law Department	10/27/94	Memorandum re. legal strategy and defense of claim	Attorney-Client
RMC0016122-RMC0016123	Correspondence	H Cole	Outside Counsel	11/10/88	Legal opinion and advice	Work Product/Attorney-Client
RMC0016177	Memorandum with attachment	Law Department, other RMC personnel, and select insurance carrier representatives	K Kestle	02/02/84	Transmittal of information to Legal Department re legal strategy and defense of claims	Work Product/Attorney-Client/ Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0016180	Handwritten Notes	N/A	H Cole	Undated	Notes re: legal strategy for litigation	Work Product/Attorney-Client/ Party Communication
RMC0016181-RMC0016183	Memorandum with attachment	Law Department and other RMC personnel	L Walczykowski	02/27/92	Legal strategy re: pending litigation	Work Product/Attorney-Client/ Party Communication
RMC0016184-RMC0016185	Memorandum with attachment	Law Department and other RMC personnel	K Kestle	02/12/92	Legal strategy re: pending litigation	Work Product/Attorney-Client
RMC0016264	Chart	N/A	N/A	Undated	Information compiled for legal strategy in pending litigation	Work Product/Party Communication
RMC0016265-RMC0016266	Chart	N/A	N/A	Undated	Information compiled for legal strategy in pending litigation	Work Product/Party Communication
RMC0016268-RMC0016273	Memorandum with attachments and handwritten notes	B Peterson B Sasser	P Laden Law Department	01/17/86	Transmittal of legal research	Work Product/Attorney-Client
RMC0016670-RMC0016671	Memorandum	J Amos Law Department	J Davison	09/29/80	Request for legal opinion re proposed legislation	Attorney-Client
RMC0016672	Memorandum	J Donohue Law Department	H Cole	11/03/83	Request for legal opinion re proposed legislation	Attorney-Client
RMC0016687	Memorandum	Law Department	H Cole	11/03/83	Request for legal opinion re proposed legislation	Attorney-Client
RMC0016691	Memorandum	P Laden Law Department	J McGill	11/14/83	Request for legal opinion on proposed legislation	Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0016692-RMC0016698	Memorandum with attachment	J McGill	P Laden Law Department	12/19/83	Legal opinion re proposed legislation	Attorney-Client
RMC0016713	Memorandum	File	H Cole	06/24/77	Request for legal opinion	Attorney-Client
RMC0016720-RMC0016727	Memorandum with attachment	J Amos	N Triano	12/09/92	Proposed company policy in anticipation of litigation	Work Product/Party Communication
RMC0016911	Correspondence	Outside counsel	P Laden Law Department	10/30/92	Discussion of legal research	Work Product/Attorney-Client
RMC0016912	Correspondence	Law Department	Outside counsel		Transmittal of legal research with commentary	Work Product/Attorney-Client
RMC0017443-RMC0017448	Memorandum with attachment	H Cole	Law Department	09/01/92	Legal analysis of legislation and draft company policy	Attorney-Client
RMC0019348-RMC0019355	Memorandum with attachment	P Laden Law Department	H Cole	08/28/85	Draft company policy with request for legal analysis	Attorney-Client
RMC0019357-RMC0019364	Memorandum with attachment	P Laden, J Donohue, J McKewan and Law Department	H Cole	08/28/85	Same document as RMC0019348-RMC0019355	Attorney-Client
RMC0019401-RMC0019404	Memorandum with attachments	J McGill, Law Department and other RMC personnel	H Cole	09/22/89	Memorandum with request for legal analysis	Attorney-Client/ Party Communication
RMC0021570-RMC0021572	Memorandum with attachment	H Cole	R Krotseng Law Department	01/11/88	Transmittal of information re proposed legislation and anticipated litigation	Work Product/Attorney-Client
RMC0021574	Memorandum	P Laden Law Department	H Cole	07/06/87	Memorandum re: proposed legislation	Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0021575-RMC0021582	Memorandum	N/A	J Hill	04/13/87	Memorandum re proposed legislation	Attorney-Client
RMC0021594-RMC0021602	Memorandum with attachment	P Laden Law Department	H Cole	07/06/87	Same document as RMC0021575-RMC0021582	Attorney-Client
RMC0021661-RMC0021667	Memorandum with attachment	E Irby	M Kendall Law Department	07/02/86	Memorandum re: proposed legislation	Attorney-Client
RMC0021668-RMC0021672	Memorandum with attachment	H Cole S Walker	M Kendall Law Department	07/01/86	Memorandum re: proposed legislation	Attorney-Client
RMC0021673-RMC0021679	Memorandum with attachment	E Irby	M Kendall Law Department	07/02/86	Same document as RMC0021661-RMC0021667	Attorney-Client
RMC0021680	Memorandum	E Irby	M Kendall Law Department	07/02/86	Memorandum re: proposed legislation	Attorney-Client
RMC0021681-RMC0021689	Memorandum	All members	D Sanford	05/27/86	Memorandum re: proposed legislation	Attorney-Client
RMC0022006-RMC0022012	Memorandum with attachments	H Cole J Amos Law Department	B Hunton	01/11/78	Transmittal of information re: proposed legislation	Attorney-Client
RMC0023330-RMC0023372	Memorandum	J McGill	P Laden Law Department	09/30/91	Legal research memorandum re: OSHA	Work Product/Attorney-Client
RMC0024004-RMC0024031	Law file	N/A	N/A	Various	Legal memoranda and correspondence re proposed regulations	Work Product/Attorney-Client
RMC0024039-RMC0024040	Law file	N/A	N/A	Various	Legal memoranda and correspondence re: proposed regulations	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0024196-RMC0024198	Memorandum with attachments	R Krotseng Law Department	R Benton	04/30/91	Discussion of discovery responses in pending litigation	Work Product/Attorney-Client
RMC0024199-RMC0024201	Memorandum with attachments	R Krotseng Law Department	R Benton	01/09/91	Discussion of discovery responses in pending litigation	Work Product/Attorney-Client
RMC0024256	Memorandum	H Cole and other RMC personnel	B Mallinger Law Department	10/20/86	Legal opinion re: standard contract language	Attorney-Client
RMC0024612 - RMC0024623	Handbook/Manual	N/A	R Benton	N/A	Information re internal audit	Self Critical Analysis
RMC0024631	Memorandum	Law Department and other RMC personnel	E Irby	06/14/90	Information for legal strategy in connection with litigation	Work Product/Attorney-Client/ Party Communication/ Physician/Patient
RMC0024724-RMC0024725	Chart	N/A	N/A	N/A	Transmittal of information re pending litigation	Work Product/Attorney-Client
RMC0033252-RMC0033284	Internal Audit Forms and Memoranda	N/A	N/A	Undated	Forms and memoranda governing internal audits for compliance with environmental, health and safety regulations	Work Product/Self-Critical Analysis
RMC0036378-RMC0036403	Internal Audit Forms and Memoranda	N/A	N/A	Undated	Forms and memoranda governing internal audits for compliance with environmental, health and safety regulations	Work Product/Self-Critical Analysis
RMC0036418	Chart	N/A	N/A	Undated	Information compiled for legal strategy in pending litigation	Work Product/Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0036423-RMC0036426	Redacted Document	N/A	N/A	Undated	Personnel evaluation describing participation in litigation as consultant and expert witness	Work Product/Party Communication
RMC0036442	Memorandum	N/A	N/A	Undated	Information compiled for legal strategy in pending litigation	Work Product/Party Communication
RMC0039346-RMC0039352	Memorandum with attachments	H Cole and other RMC personnel	B Mallinger Law Department	04/09/90	Legal analysis of company procedures	Attorney-Client
RMC0039353-RMC0039359	Memorandum with attachments	H Cole and other RMC personnel	B Mallinger Law Department	04/09/90	Same document as RMC0039346-RMC0039352	Attorney-Client
RMC0039410-RMC0039427	Memorandum with attachments	H Cole and other RMC personnel	B Mallinger Law Department	01/29/90	Draft company procedures with legal analysis	Attorney-Client
RMC0039428-RMC0039445	Memorandum with attachments	H Cole and other RMC personnel	B Mallinger Law Department	01/29/90	Same document as RMC0039410-RMC0039427	Attorney-Client
RMC0039615-RMC0039659	Memorandum with attachments	Purchasing Managers	R Manzo Law Department	12/04/91	Legal opinion re. standard contract language	Attorney-Client
RMC0039698-RMC0039700	Memorandum	E Irby	P Laden Law Department	05/15/89	Response to request for legal opinion	Attorney-Client
RMC0039701	Memorandum	Law Department and other RMC personnel	B Peterson	10/16/86	Legal review of draft version of company guidelines	Attorney-Client
RMC0039702-RMC0039710	Memorandum with attachment	Law Department and other RMC personnel	H Cole	10/07/86	Proposed company guidelines with request for legal review	Attorney-Client
RMC0039716-RMC0039727	Memorandum with attachments	P Laden, Law Department and other RMC personnel	B Sasser	04/12/83	Draft of company guidelines with request for legal review	Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0039729	Memorandum	Law Department and other RMC personnel	K Kestle	11/06/90	Transmittal of information re: legal strategy and defense of claims	Work Product/Attorney-Client/ Party Communication
RMC0039810-RMC0039813	Handwritten notes	N/A	N/A	N/A	Notes re: pending litigation	Attorney-Client/Work Product/Physician-Patient
RMC0039832-RMC0039847	Chart	N/A	N/A	N/A	Transmittal of information re: pending litigation	Work Product/ Attorney-Client
RMC0039855-RMC0039857	Memorandum with attachment	W Doane	R Krotseng Law Department	10/12/95	Transmittal of information re: pending litigation	Work Product/Attorney-Client
RMC0039858-RMC0039863	Charts	N/A	N/A	N/A	Outline of internal procedures re: anticipated legislation	Work Product/Attorney-Client
RMC0039870-RMC0039875	Law File	N/A	N/A	Various	Memoranda and correspondence re. anticipated litigation	Work Product/Physician-Patient
RMC0039876-RMC0039878	Correspondence	K Kestle	J Witt	03/23/93	Correspondence re: pending litigation and defense strategy	Work Product/Party Communication
RMC0039879-RMC0039885	Correspondence with attachments	J Witt	F Maxey	03/12/93	Correspondence re pending litigation and defense strategy	Work Product/Party Communication
RMC0040094-RMC0040101	Law File	N/A	N/A	Various	Compilation of information re anticipated litigation	Work Product/Attorney-Client/ Party Communication/ Physician-Patient
RMC0040102-RMC0040131	Law File	N/A	N/A	Various	Legal file re: pending litigation	Work Product/Party Communication/Physician Patient

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0040132-RMC0040137	Law File	N/A	N/A	Various	Legal file re: pending litigation	Work Product/Party Communication
RMC0040138	Memorandum	Law Department and other RMC personnel	K Kestle	11/06/90	Memorandum re: legal strategy and pending litigation	Work Product/Attorney-Client/ Party Communication
RMC0040139-RMC0040143	Handwritten memorandum with attachments	K Kestle	J Witt	01/31/90	Memorandum re legal strategy and pending litigation	Work Product/Attorney-Client/ Party Communication
RMC0040144-RMC0040146	Memorandum	RMC personnel	Law Department	08/30/90	Law Department memorandum with legal advice from outside counsel	Work Product/Attorney-Client
RMC0040147	Memorandum	Law Department and other RMC personnel	E Irby	07/25/90	Memorandum requesting legal advice	Attorney-Client
RMC0040148-RMC0040163	Correspondence with attachment	J Witt	Outside counsel	08/09/90	Litigation advice and strategy	Work Product/Attorney-Client/ Party Communication
RMC0040164-RMC0040167	Handwritten notes with attachments	Outside counsel	K Kestle	08/03/90	Request for legal analysis	Work Product/Attorney-Client/ Physician-Patient
RMC0040168-RMC0040178	Law File	N/A	N/A	Various	Memoranda and correspondence re anticipated litigation	Work Product/Attorney-Client/ Party Communication
RMC0040179-RMC0040190	Law File	N/A	N/A	Various	Memoranda and correspondence re anticipated litigation	Work Product/Attorney-Client/ Party Communication
RMC0040191-RMC0040193	Law File	N/A	N/A	Various	Memoranda and correspondence re: pending and anticipated litigation	Work Product/Attorney-Client/ Party Communication
RMC0040194-RMC0040195	Law File	N/A	N/A	Various	Memoranda re pending and anticipated litigation	Work Product/Attorney-Client/ Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0040196-RMC0040199	Law File	N/A	N/A	Various	Memoranda re pending and anticipated litigation	Work Product/Attorney-Client/ Party Communication/ Physician-Patient
RMC0040200-RMC0040204	Law File	N/A	N/A	Various	Memoranda and correspondence re. pending and anticipated litigation	Work Product/Attorney-Client/ Party Communication/ Physician-Patient
RMC0040205-RMC0040211	Transcript of telephone interview	N/A	N/A	10/24/90	Transcript of telephone interview in connection with pending litigation	Work Product
RMC0040212-RMC0040217	Correspondence	RMC	Outside Counsel	12/23/91	Attorney update and legal opinion	Work Product/Attorney-Client
RMC0040218-RMC0040243	Correspondence with attachment	K Kestle	J Witt	12/09/91	Correspondence re: legal opinion with attached legal memorandum	Work Product/Attorney-Client/ Party Communication
RMC0040244-RMC0040258	Correspondence with attachments	RMC	Outside Counsel	12/11/91	Attorney update on pending litigation	Work Product/Attorney-Client
RMC0040259-RMC0040266	Correspondence with attachments	RMC	Outside Counsel	11/26/91	Attorney update on pending litigation	Work Product/Attorney-Client
RMC0040267-RMC0040464	Correspondence with attachments	RMC	Outside Counsel	11/08/91	Attorney update on pending litigation	Work Product/Attorney-Client
RMC0040465-RMC0040466	Correspondence with attachments	RMC	Outside Counsel	10/28/91	Attorney update on pending litigation	Work Product/Attorney-Client
RMC0040467-RMC0040469	Correspondence	RMC	Outside Counsel	10/24/91	Attorney update on pending litigation	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0040566-RMC0040571	Correspondence	K Kestle	J DiBuono	08/27/91	Transmittal of information re pending litigation	Attorney-Client
RMC0040644-RMC0040648	Correspondence with attachment	J Witt	K Kestle	09/06/89	Transmittal of information re: pending litigation and legal strategy	Work Product/Party Communication
RMC0040649	Correspondence	J Leroy J Donohue R Krotseng Law Department	J Quigley	01/14/88	Transmittal of information providing information for litigation strategy	Work Product/Attorney-Client
RMC0040650-RMC0040652	Correspondence with attachment	R Smith	J Donohue Law Department	10/13/86	Transmittal of information re. insurance policies and pending litigation	Work Product/Attorney-Client
RMC0040653-RMC0040655	Correspondence with attachment	R Blasi	E Nelson	03/26/85	Transmittal of information re pending litigation	Work Product/Attorney-Client
RMC0040656-RMC0040658	Memorandum with attachment	J Smith	J Donohue Law Department	12/11/84	Transmittal of information re: pending litigation	Work Product/Attorney-Client
RMC0040659-RMC0040664	Memorandum with attachments	R Smith	J Donohue Law Department	07/25/83	Transmittal of information re: pending litigation	Work Product/Attorney-Client
RMC0040685-RMC0040710	Memorandum with attachment	K Kestle	R Smith, Jr.	Undated	Memorandum transmitting legal research from outside counsel	Work Product/Attorney-Client
RMC0040726-RMC0040728	Correspondence with attachment	K Kestle	J Witt	03/23/93	Litigation strategy with attached claims analysis	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0042592-RMC0042632	Internal Audit Forms and Memoranda	N/A	N/A	Undated	Forms and memoranda governing internal audits for compliance with environmental, health, and safety regulations	Self-Critical Analysis
RMC0042917-RMC0042918	Memorandum	H Cole B Sasser	P Laden Law Department	01/25/88	Legal Department memorandum with analysis of company guidelines	Work Product/Attorney-Client
RMC0042967-RMC0042968	Memorandum	H Cole B Sasser	Law Department	01/25/88	Same document as RMC0042917-RMC0042918	Work Product/Attorney-Client
RMC0047959-RMC0047961	Internal Audit Memorandum	N/A	N/A	Undated	Memorandum governing internal guidelines for compliance with environmental, health, and safety regulations	Self-Critical Analysis
RMC0048464-RMC0048468	Report of Internal Audits	N/A	N/A	1990	Report of internal audits for compliance with environmental, health, and safety regulations	Self-Critical Analysis
RMC0048469-RMC0048483	Report of Internal Audits	N/A	N/A	4/12/90	Report of internal audits for compliance with environmental, health, and safety regulations	Self-Critical Analysis
RMC0048872-RMC0049083	Memorandum with attachments	E Irby	Law Department	5/15/89	Response to request for legal opinion	Work Product/Attorney-Client
RMC0049380-RMC0049397	Memorandum with attachments	H Cole	B Mallinger Law Department	04/09/90	Legal Department memorandum with analysis of company guidelines	Attorney-Client
RMC0050091-RMC0050100	Internal Audit Chart	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Self-Critical Analysis
RMC0050161-RMC0050173	Internal Audit Memorandum	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0050469	Memorandum	P Laden Law Department	H Cole	05/05/89	Transmittal of draft company policy with request for legal analysis	Attorney-Client
RMC0051468	Memorandum	Law Department and other RMC personnel	D Turner	12/03/92	Request for legal opinion re new legislation	Attorney-Client
RMC0051469	Memorandum	Law Department	N Triano	12/09/92	Request for legal opinion	Work Product/Attorney-Client
RMC0051470-RMC0051476	Memorandum	N Triano	K Menk and other RMC Personnel	12/04/92	Memorandum re. adoption of company policy in anticipation of possible litigation or regulatory action	Work Product/Party Communication
RMC0051502-RMC0051560	Correspondence with attachments	Outside counsel	Law Department	10/30/92	Transmittal letter and legal research memorandum	Work Product/Attorney-Client
RMC0051561-RMC0051564	Memorandum with attachment	Law Department	E Irby	02/25/91	Information for legal strategy	Work Product/Attorney-Client
RMC0052197-RMC0052198	Correspondence	J Witt	F Maxey	03/12/93	Correspondence re pending litigation and defense strategy	Work Product/Attorney-Client/Party Communication
RMC0052205-RMC0052206	Memorandum with attachment	Law Department and other RMC personnel and selected insurance carrier representatives	L Walczykowski	02/27/92	Memorandum and attachment discussing litigation strategy	Work Product/Attorney-Client/ Party Communication
RMC0052207-RMC0052208	Memorandum with attachment	Law Department and other RMC personnel and selected insurance carrier representatives	L Walczykowski	01/09/90	Memorandum and attachment discussing litigation strategy	Work Product/Attorney-Client/ Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0052209-RMC0052213	Memorandum with attachment	Law Department and other RMC personnel and selected insurance carrier representatives	L Johnson	01/25/89	Memorandum and attachment discussing litigation strategy	Work Product/Attorney-Client/ Party Communication
RMC0052682-RMC0052686	Internal Audit Forms and Memorandum	N/A	N/A	Undated	Forms and memoranda governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052688-RMC0052691	Reports of Internal Audits	N/A	G Martin	Undated	Memorandum and report of internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052703-RMC0052710	Memorandum and Reports of Internal Audit	N/A	N/A	02/21/91	Memorandum and report of internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052758-RMC0052818	Report of Internal Audit	N/A	N/A	Undated	Report of internal audit for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052819-RMC0052875	Correspondence with attachment	R Nelson	G Martin	07/03/91	Transmittal letter and report of internal audit for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052876-RMC0052879	Memorandum with attachments	B Sasser	S Millsap	12/14/89	Memorandum and report of internal audit for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0052880-RMC0052882	Report of Internal Audit with attachment	N/A	N/A	12/07/89	Memorandum and report of internal audit for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0052909-RMC0052937	Memorandum with attachments	R Krotseng Law Department	B Sasser	11/01/94	Transmittal of information re: pending litigation	Attorney-Client
RMC0053895-RMC0054242	Internal Audit Forms and Memoranda	N/A	N/A	Undated	Memorandum and forms governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0054243-RMC0054271	Internal Audit Forms and Memorandum	B Sasser	P Laden Law Department	Undated	Transmittal memorandum and forms governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Attorney Client/ Self-Critical Analysis
RMC0054554	Memorandum	J Donohue Law Department	P Laden Law Department	03/12/90	Legal opinion and advice re: company procedure	Work Product/Attorney-Client
RMC0054588-RMC0054607	Report of Internal Audits	N/A	N/A	Various	Report of internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0054693-RMC0054709	Memorandum	N/A	N/A	N/A	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Work Product/Self-Critical Analysis
RMC0054710-RMC0054711	Memorandum	Law Department and other RMC Personnel	Y Brandt	04/29/93	Draft memorandum governing internal audits for compliance with environmental, health and safety regulations	Attorney-Client/Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0054712-RMC0054716	Memoranda with attachment	RMC personnel	J Amos	03/02/93	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0054745-RMC0054752	Internal Audit Memorandum	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health, and safety regulation	Work Product/Self-Critical Analysis
RMC0058210-RMC0058216	Memoranda	G Bourcier	Law Department and other RMC personnel	Various	Report of attorney-client meeting	Work Product/Attorney-Client
RMC0058217	Memorandum	G Bourcier	Law Department and other RMC personnel	01/19/93	Agenda for attorney-client meeting	Work Product/Attorney-Client
RMC0059752	Internal Audit Memorandum	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health, and safety regulation	Work Product/Self-Critical Analysis
RMC0063012-RMC0063144	Report	N/A	H Tyroler	5/15/78	Information for legal strategy	Work Product
RMC0064053	Handwritten note	P Laden Law Department	R Benton	Undated	Transmittal requesting legal advice	Work Product/Attorney-Client
RMC0066396-RMC0066404	Memorandum with attachment	Law Department and other RMC personnel	B Sasser	05/02/83	Transmittal of draft company policy with legal advice	Work Product/Attorney-Client
RMC0066574-RMC0066616	Law File	J McGill Law Department	P Laden Law Department	09/30/91	Draft legal research memorandum	Work Product/Attorney-Client
RMC0066617-RMC0066637	Memorandum with attachments	Law Department and other RMC personnel	P Laden Law Department	08/08/91	Transmittal and memorandum re. information compiled for legal advice	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0066647-RMC0066648	Memorandum	RMC Personnel	P Laden, B Sasser and Law Department	08/06/87	Memorandum re: legal advice	Work Product/Attorney-Client
RMC0066649-RMC0066650	Memorandum	J McGill Law Department	B Sasser	07/14/87	Memorandum re: information for legal advice	Work Product/Attorney-Client
RMC0066665	Memorandum	P Laden Law Department	B Sasser	09/10/87	Request for legal advice re company policy	Work Product/Attorney-Client
RMC0066714-RMC0066716	Correspondence with attachment	Outside Counsel	B Sasser	09/16/88	Transmittal of draft correspondence with request for legal analysis	Work Product/Attorney-Client
RMC0066730-RMC0066733	Internal Audit Memorandum	N/A	N/A	04/12/90	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0068026-RMC0068027	Memorandum	RMC Personnel	B Sasser	08/21/89	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0068100	Memorandum	E Irby B Sasser	J McGill Law Department	02/24/89	Legal advice on company policy	Work Product/Attorney-Client
RMC0068101-RMC0068113	Handwritten notes	N/A	N/A	Undated	Handwritten notes re: internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0068217-RMC0068221	Memorandum with attachment	RMC Personnel	J Amos	03/02/93	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0068222-RMC0068225	Memorandum with attachment	J Amos	RMC Personnel	02/22/93	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0068226-RMC0068232	Memorandum	RMC Personnel	J Amos	02/05/93	Memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Self-Critical Analysis
RMC0068280-RMC0068303	Memorandum with attachment	E Irby B Sasser H Cole	Law Department	11/05/91	Transmittal of memorandum governing internal audits for compliance with environmental, health, and safety regulations	Work Product/Attorney-Client/ Self-Critical Analysis
RMC0068471-RMC0068589	Internal Audit Forms and memorandum	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Work Product/Attorney-Client/ Self-Critical Analysis
RMC0070765-RMC0070809	Chart	N/A	N/A	03/24/93	Summary of environmental issues including legal analysis.	Work Product/Attorney-Client
RMC0070810-RMC0071007	Memoranda and charts	N/A	N/A	Various	Summary of environmental issues including legal analysis	Work Product/Attorney-Client
RMC0071008-RMC0071170	Memoranda and charts	N/A	N/A	Various	Summary of environmental issues including legal analysis.	Work Product/Attorney-Client
RMC0071357-RMC0071495	Correspondence with attachment	L Tropea	Outside Counsel	05/08/91	Transmittal letter and legal research memorandum.	Attorney-Client/Non-Responsive

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0071667-RMC0071670	Memorandum with attachment	Plant Managers	J Doyle Law Department	02/18/76	Legal department memorandum re government regulation	Attorney-Client/Non-Responsive
RMC0071671-RMC0071673	Memorandum with attachment	J Doyle Law Department	L Tropea	02/03/76	Transmittal of draft Law Department memorandum re: government inspection	Attorney-Client/Non-Responsive
RMC0071676-RMC0071679	Memorandum with attachment	RMC Personnel	J Doyle Law Department	02/18/76	Legal department memorandum re: government inspection and legal analysis	Attorney-Client/Non-Responsive
RMC0071698-RMC0071713	Memoranda/Forms	N/A	N/A	N/A	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis/ Work Product
RMC0071714-RMC0071724	Memorandum	RMC Personnel	L Tropea	10/31/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0071845-RMC0071862	Memorandum	RMC Personnel	R Mait	11/19/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis/Non-Responsive
RMC0072161-RMC0072177	Memoranda	RMC Personnel and Law Department	R Hanneman	Various	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Attorney-Client/Self-Critical Analysis/Non-Responsive
RMC00072247-RMC00072249	Memorandum	R Doolin	L Tropea, Jr	08/06/90	Memorandum re environmental issues with request for legal department advice	Attorney-Client/Non-Responsive

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0072254-RMC0072256	Memorandum	B Hart	L Tropea, Jr	07/18/86	Memorandum re: environmental issues with request for legal department advice	Attorney-Client/Non-Responsive
RMC0072327-RMC0072328	Memorandum	J Amos	N Triano	12/09/92	Memorandum re: proposed company policy in anticipation of litigation	Non-Responsive/Party Communication/Work Product
RMC0072329-RMC0072336	Memorandum	N Triano	K Menk J Marshburn J Hendricks	12/04/92	Memorandum re: adoption of company policy in anticipation of possible litigation or regulatory action	Attorney-Client/Non-Responsive/Work Product
RMC0072840-RMC0072856	Memorandum with attachments	D Pemberton	J McKinnon Law Department	04/26/91	Transmittal memorandum and attachment discussing legal strategy	Attorney-Client/Non-Responsive Work Product (Bates Number RMC0072840-RMC0072843: Work Product Doctrine Attorney-Client Privilege)
RMC0072857-RMC0072870	Memorandum with attachment	RMC Personnel	J McKinnon Law Department	12/31/90	Memorandum transmitting letter from outside counsel re: pending litigation	Work Product/Attorney-Client (Bates Number RMC0072857): Non-Responsive
RMC0072872-RMC0072876	Memorandum with attachment	RMC Personnel	E Ashe	09/05/90	Letter and chart providing information for legal strategy	Attorney-Client/Party Communication/Non-Responsive

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0072877-RMC0072897	Memorandum	N/A	Consulting Expert	05/13/90	Database report containing information for legal strategy	Attorney-Client/ Work product/ Party Communication
RMC0072898-RMC0072921	Memorandum with attachment	RMC Personnel	E Ashe	08/28/90	Law department memorandum and attachment re. information for attorney-client privilege meeting	Attorney-Client/Party Communication
RMC0073042-RMC0073053	Memorandum with attachment	RMC Personnel	L Tropea	12/31/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0073151	Memorandum	R Benton	B Mallinger Law Department	10/17/91	Law department memorandum re. procedures	Attorney-Client
RMC0073152-RMC0073162	Memorandum with attachments	B Mallinger Law Department	R Benton	09/25/91	Memorandum regarding company procedures with request for legal analysis	Attorney-Client
RMC0076997-RMC0077000	Memorandum with attachment	Law Department and other RMC personnel	J Marshburn	04/21/88	Communication requesting legal opinion regarding company procedures	Attorney-Client
RMC0077318-RMC0077320	Chart	N/A	N/A	00/00/92	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0077321-RMC0077323	Memorandum	J Amos	L Tropea	01/23/93	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0077324	Memorandum	L Tropea	C Bent	06/12/92	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0077325-RMC0077326	Memorandum	N/A	N/A	11/00/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0077336-RMC0077338	Memorandum with attachment	L Tropea	C Bent	12/30/91	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0077339-RMC0077340	Memorandum	L Tropea	C Bent	02/26/91	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0077341-RMC0077343	Memorandum	N/A	D Juberg	09/09/91	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self Critical Analysis
RMC0077344	Handwritten Notes	N/A	N/A	N/A	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis/Non-Responsive
RMC0077350-RMC0077352	Outline	N/A	N/A	N/A	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0077353-RMC0077357	Outline	N/A	N/A	N/A	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis/Non-Responsive
RMC0077894-RMC0077895	Memorandum with attachment	Law Department, other RMC personnel and insurance representatives	L Walczykowski	02/27/92	Memorandum discussing pending litigation	Work Product/Attorney-Client/ Party Communication
RMC0077896-RMC0077897	Memorandum with attachment	Law Department, other RMC personnel and insurance representatives	K Kestle	02/12/92	memorandum discussing pending litigation	Work Product/Attorney-Client/ Party Communication
RMC0077898-RMC0077911	Law Department File	N/A	N/A	06/00/82	Memorandum containing information for use in pending litigation	Attorney-Client/Party Communication
RMC0077912-RMC0077915	Memorandum	N/A	N/A	Various	Memorandum discussing pending litigation and defense strategy	Work Product/Attorney-Client/ Party Communication
RMC0078039-RMC0078041	Handwritten notes	K Kestle	LAJ	N/A	Information re: pending and anticipated claims.	Work Product/Attorney-Client/ Party Communication
RMC0078042-RMC0078048	Memorandum with attachments	Law Department and other RMC personnel	K Kestle	03/20/86	Correspondence re: pending litigation	Work Product/Attorney-Client/ Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0078049-RMC0078050	Memorandum	Law Department and other RMC personnel	K Kestle	08/21/86	Correspondence re: pending litigation	Attorney-Client/Party Communication
RMC0078051-RMC0078054	Correspondence with attachments	N/A	N/A	N/A	Communication re. pending claims	Work Product/Attorney-Client/ Party Communication
RMC0080047-RMC0080053	Memorandum with attachment	H Cole	B Mallinger Law Department	04/09/90	Memorandum and attachment with legal analysis of company policy	Attorney-Client/Work Product
RMC0080394-RMC0080404	Memorandum with attachment	RMC personnel	L Tropea	12/31/90	Same documents as RMC0073042-RMC0073053	Self-Critical Analysis
RMC0080405-RMC0080414	Memorandum with attachment	RMC personnel	R Hanneman	07/26/89	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0082994-RMC0083109	Internal Audit Forms and Memoranda	N/A	N/A	Various	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0083110-RMC0083115	Memorandum	A Shehee	L Tropea	02/16/89	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0083116-RMC0083121	Memorandum	N/A	N/A	03/02/89	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0083122-RMC0083127	Memorandum with attachments	J McKinnon Law Department and other RMC personnel	C Taylor	02/09/89	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0083233-RMC0083288	Internal Audit Memoranda/Law Department File	N/A	Law Department	Various	Memorandum governing internal audits for compliance with environmental, health and safety regulations, and memoranda containing legal analysis	Attorney-Client/Work Product/ Self-Critical Analysis
RMC0083342-RMC0083349	Internal Audit Memorandum	N/A	N/A	Undated	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0083368-RMC0083374	Memorandum with attachment	R Hannamann	H Cole	08/03/87	Memorandum transmitting legal advice re. company policy	Attorney-Client
RMC0083375-RMC0083380	Memorandum with attachments	D Tipton H Cole	W Strain	07/14/87	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0083381-RMC0083388	Memorandum with attachment	J Miniclier	C Stumpe	06/04/85	Memorandum transmitting legal advice re company policy	Work Product/Attorney-Client
RMC0083722-RMC0083726	Memorandum with attachment	P Laden Law Department and other RMC personnel	C Nelson	01/16/90	Memorandum transmitting information for legal strategy	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0083745	Handwritten Note	N/A	N/A	Undated	Information for legal strategy and defense of claim	Work Product/Attorney-Client/ Party Communication
RMC0083751	Handwritten Note	N/A	N/A	Undated	Information for legal strategy and defense of claim	Work Product/Attorney-Client/ Party Communication
RMC0083752	Handwritten Note	N/A	N/A	08/03/90	Information for legal strategy and defense of claim	Work Product/Attorney-Client/ Party Communication
RMC0083753-RMC0083755	Handwritten Chart with attachments	N/A	N/A	07/31/90	Medical information for legal strategy and defense of claim	Work Product/Attorney-Client/ Party Communication/Physician-Patient
RMC0083756	Memorandum	P Laden Law Department and other RMC personnel	E Irby	07/25/90	Transmittal of information with request for legal analysis	Work Product/ Attorney-Client/ Party Communication
RMC0083760-RMC0083762	Handwritten notes with attachment	Outside counsel	N/A	Undated	Transmittal of information for legal strategy.	Work Product/ Attorney-Client/ Party Communication
RMC0083793-RMC0083799	Memorandum with attachment	H Cole	B Mallinger Law Department	04/09/90	Same as RMC0080047-RMC0080053	Work Product/Attorney-Client
RMC0083862-RMC0083868	Correspondence with attachments	R Hanneman	H Cole	08/03/87	Same as RMC0083368-RMC0083374	Self-Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0084131-RMC0084137	Memorandum with attachments	R Benton T McCracken	B Mallinger Law Department	03/02/90	Legal department memorandum re. company procedures and legal analysis	Work Product/Attorney-Client
RMC0084351-RMC0084353	Memorandum with attachment	R Hanneman	L Tropea	07/27/89	Transmittal of draft company procedures and request for legal analysis	Attorney-Client
RMC0084416-RMC0084431	Memorandum with attachments	N/A	N/A	Undated	Transmittal of draft company procedures and request for legal analysis	Attorney-Client
RMC0084432-RMC0084435	Handwritten Notes with attachment	N/A	N/A	Various	Handwritten notes re: internal audits	Work Product/Attorney-Client/ Self-Critical Analysis
RMC0084436	Memorandum	B Mallinger Law Department	R Benton	06/27/89	Communication re company procedures	Attorney-Client
RMC0084519-RMC0084523	Memorandum with attachments	R Hanneman	H Cole	08/03/87	Memorandum transmitting legal advice re: company policy.	Work Product/Attorney-Client
RMC0084531-RMC0084533	Report of Internal Audit	D Tipton H Cole	W Strain	07/14/87	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self-Critical Analysis
RMC0084625	Memorandum	P Laden, Law Department and other RMC personnel	E Irby	07/25/90	Same as document RMC0040147	Work Product/Attorney-Client
RMC0084626-RMC0084633	Memorandum	Plant managers and purchasing agents	H Cole	05/09/90	Memorandum re: legal analysis of company policy.	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0084694-RMC0084712	Memorandum with attachment	Law Department and other RMC personnel	B Mallinger Law Department	01/29/90	Legal department memorandum re: legal analysis of company procedures	Attorney-Client
RMC0084713-RMC0084716	Memorandum	N/A	N/A	N/A	Memorandum re: legal analysis of legislation	Work Product/Attorney-Client
RMC0084717-RMC0084729	Memorandum with attachment	Law Department and other RMC personnel	B Mallinger Law Department	11/09/89	Legal department memorandum re legal analysis of company procedures	Attorney-Client
RMC0084931-RMC0084932	Memorandum with attachment	J Marshburn	H Cole	11/15/88	Law Department communications re company procedures	Attorney-Client
RMC0084933	Memorandum	H Cole	D Mortimer	11/05/84	Memorandum re: adoption of company policy in anticipation of possible litigation or regulatory action.	Work Product/Attorney-Client/ Party Communication
RMC0084967-RMC0084971	Memorandum	J McGill P Laden B Mallinger Law Department and other RMC personnel	H Cole	05/09/90	Memorandum transmitting legal analysis of company policy.	Work Product/Attorney-Client
RMC0084972-RMC0084978	Memorandum with attachment	H Cole	B Mallinger Law Department	04/09/90	Same document as RMC0080047-RMC0080053	Work Product/Attorney-Client
RMC0084979-RMC0084985	Memorandum with attachment	R Benton T McCracken	B Mallinger Law Department	03/02/90	Law department memorandum re legal analysis of company procedures	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0084986-RMC0084987	Memorandum	R Benton	R Scruggs Law Department	02/21/90	Law department memorandum re: legal analysis of company procedures	Work Product/Attorney-Client
RMC0084995-RMC0085012	Memorandum with attachments	B Mallinger Law Department	R Benton	05/10/89	Communication re: legal analysis of company procedures	Work Product/Attorney-Client
RMC0085013-RMC0085014	Memorandum	R Benton	B Mallinger Law Department	05/16/89	Law department memorandum re: legal analysis of company procedures	Work Product/Attorney-Client
RMC0085015	Memorandum	A Adams, Jr.	B Mallinger Law Department	04/25/89	Law department memorandum re legal analysis of company procedures	Work Product/Attorney-Client
RMC0085016-RMC0085017	Memorandum	B Mallinger Law Department	R Benton	05/19/89	Law department memorandum re: legal analysis of company procedures	Work Product/Attorney-Client
RMC0085018	Memorandum	R Benton	J Marshburn	06/02/89	Transmittal of legal opinion of company procedures	Attorney-Client
RMC0085019-RMC0085020	Memorandum	B Mallinger Law Department	R Benton	05/19/89	Same documents as RMC0085016-RMC0085017	Attorney-Client
RMC0085201	Memorandum	H Cole	J Donohue Law Department	05/18/84	Law department memorandum re: legal analysis of company procedures	Attorney-Client
RMC0085207	Memorandum	H Cole	J Donohue Law Department	05/16/84	Law department memorandum re legal analysis of company procedures	Work Product/Attorney-Client

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0085249	Memorandum	H Cole D Mortimer	J Donohue Law Department	03/14/84	Law department memorandum re. legal analysis of company procedures	Work Product/Attorney-Client
RMC0085988- RMC0085992	Memorandum with attachments	R Hanneman	H Cole	08/03/87	Law department memorandum re. legal analysis of company procedures	Work Product/Attorney-Client
RMC0086111- RMC0086122	Memorandum	N/A	Outside Counsel	02/14/91	Transmittal of legal advice	Work Product/Attorney-Client
RMC0086175- RMC0086181	Memorandum with attachments	R Hanneman	H Cole	08/03/87	Memorandum re: company policy containing legal analysis.	Work Product/Attorney-Client
RMC0086182- RMC0086187	Report of Internal Audit with attachments	D Tipton H Cole	WC Strain	07/14/87	Report of internal audits for compliance with environmental, health and safety regulations.	Self-Critical Analysis
RMC0086188- RMC0086195	Memorandum with attachments	J Miniclier	C Stumpe	06/04/85	Memorandum transmitting legal advice re: company policy	Work Product/Attorney-Client
RMC0086359	Handwritten Note	N/A	N/A	N/A	Information re: pending litigation and defense of claims	Work Product/Attorney-Client/ Party Communication
RMC0086885- RMC0086890	Report of Internal Audit with attachments	D Tipton H Cole	W Strain	07/14/87	Report of internal audits for compliance with environmental, health and safety regulations	Work Product/Self-Critical Analysis
RMC0087716- RMC0087717	Memorandum	J Marshburn	H Cole	11/15/88	Same document as RMC0084931- RMC0084932	Work Product/Attorney-Client
RMC0087718	Memorandum	H Cole	D Mortimer	11/05/84	Same document as RMC0084933	Attorney-Client/Party Communication

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0087755-RMC0087773	Memorandum with attachment	B Mallinger Law Department	R Benton	05/10/89	Communication re: asbestos abatement procedures and requesting legal opinion	Attorney-Client
RMC0087856-RMC0087858	Memorandum with attachment	L Tropea	R Hanneman D Tipton	07/27/89	Same document as RMC0084351-RMC0084353	Attorney-Client
RMC0087875-RMC0087878	Memorandum with attachments	L Tropea	R Hanneman	10/27/87	Transmittal of draft company policy including request for legal analysis.	Work Product/Attorney-Client
RMC0087909-RMC0087911	Report of Internal Audit	D Tipton H Cole	W Strain	07/14/87	Report of internal audits for compliance with environmental, health and safety regulations.	Work Product/Self-Critical Analysis
RMC0089423-RMC0089427	Handwritten notes with attachment	N/A	N/A	N/A	Transmittal of information in anticipation of litigation.	Work Product/Attorney-Client/ Party Communication
RMC0089460-RMC0089464	Handwritten notes with attachment	N/A	N/A	Undated	Same document asRMC0089423-RMC0089427	Work Product/Attorney-Client/ Party Communication
RMC0090794-RMC0090799	Handwritten note with attached memorandum	N/A	L Wallace	02/24/92	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self Critical Analysis
RMC0090800-RMC0090807	Memorandum	L Wallace	N/A	02/21/91	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self Critical Analysis

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0090808-RMC0090821	Memorandum with attachments	L Wallace	N/A	04/12/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self Critical Analysis
RMC0090822-RMC0090826	Memorandum with attachment	L Wallace	N/A	11/06/90	Memorandum governing internal audits for compliance with environmental, health and safety regulations	Self Critical Analysis
RMC0090907-RMC0090919	Memorandum	L Wallace	J McKinnon Law Department	10/12/90	Legal opinion re. legislation	Attorney-Client
RMC0090968-RMC0090984	Memorandum with attachments	J McGill P Laden Law Department and other RMC personnel	H Cole	07/18/90	Transmittal of draft company policy with legal analysis.	Work Product/Attorney-Client

Garrett, et al v. Owens-Corning Fiberglas Corp. et al,
Cause No. 95-01915-J, in the District Court of Dallas County, Texas, 191st Judicial District

PRODUCTION NUMBERS	DOCUMENT	TO	FROM	DATE	DESCRIPTION	PRIVILEGE
RMC0000495-RMC0000538	Booklet	N/A	L Shelby	00/00/95	Handbook re: internal audit	Self Critical Analysis

Pollock v. Reynolds Metals **Company,**
Cause No. 97-58382, in the District Court of Harris County, Texas, 127th Judicial District

* No documents were withheld under a claim of privilege or protection in *Pollock v. Reynolds Metals* Company, Cause No. 97-58382, in the District Court of Harris County, Texas, 127th Judicial District