

CAUSE NO. 00CV1053

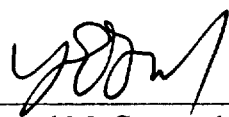
JOHN T. ORGAN § IN THE DISTRICT COURT OF
 §
 §
VS. § GALVESTON COUNTY, TEXAS
 §
GAF CORPORATION, ET AL § 122ND JUDICIAL DISTRICT

**DEFENDANT PHARMACIA CORPORATION'S, FORMERLY
KNOWN AS MONSANTO COMPANY,
INITIAL DESIGNATION OF EXPERT WITNESSES AND SUPPLEMENTATION
OF RESPONSES TO REQUESTS FOR DISCLOSURE AND INTERROGATORIES**

Pursuant to the Texas Rules of Civil Procedure, and the Court's Scheduling Order, Defendant Pharmacia Corporation, formerly known as Monsanto Company ("Monsanto") (sometimes referred to herein as "Defendant") files its initial Designation of Expert Witnesses and Supplementation of Responses to Requests for Disclosure and Interrogatories as applicable attached hereto as Exhibit 1.

Respectfully submitted,

ELLIS, CARSTARPHEN,
DOUGHERTY & GOLDENTHAL P.C.

By: 

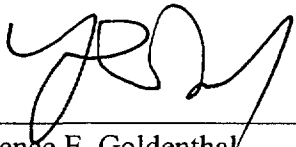
Edward M. Carstarphen
State Bar No. 03906700
G. Joe Ellis
State Bar No. 06575050
Douglas B. Dougherty
State Bar No. 06031560
Lawrence E. Goldenthal
State Bar No. 08089508
720 N. Post Oak., Ste. 330
Houston, Texas 77024
(713) 647-6800 (Telephone)
(713) 647-6884 (Facsimile)

ATTORNEYS FOR DEFENDANT
PHARMACIA CORPORATION, FORMERLY
KNOWN AS MONSANTO COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served upon Plaintiff's counsel of record by certified mail, return receipt requested on all other known counsel by regular mail as follows on this 21st day of August, 2001:

Elizabeth Schick
Lou Thompson
Stephanie Finch
Baron & Budd
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219



Lawrence E. Goldenthal

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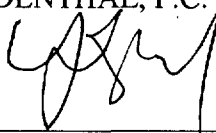
**DEFENDANT PHARMACIA CORPORATION'S,
FORMERLY KNOWN AS MONSANTO COMPANY,
CERTIFICATE OF WRITTEN DISCOVERY**

I hereby certify that on the 21st day of August, 2001, a true and correct copy of the following document was sent to counsel for Plaintiff, Elizabeth Schick, Lou Thompson and Stephanie Finch, BARON & BUDD, P.C., The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219, by U.S. Certified Mail, return receipt requested, and to all other known counsel of record by regular U.S. Mail:

1. Defendant Pharmacia Corporation's, Formerly Known as Monsanto Company Initial Designation of Expert Witnesses and Supplementation of Responses to Requests for Disclosure and Interrogatories.

Respectfully submitted,

ELLIS, CARSTARPHEN, DOUGHERTY &
GOLDENTHAL, P.C.

By: 

Edward M. Carstarphen
State Bar No. 03906700
G. Joe Ellis
State Bar No. 06575050
Douglas B. Dougherty
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State Bar No. 08089508
720 N. Post Oak Rd., Suite 330
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ATTORNEYS FOR DEFENDANT
PHARMACIA CORPORATION, FORMERLY
KNOWN AS MONSANTO COMPANY

EXHIBIT 1

I.

Defendant Pharmacia Corporation's, formerly known as Monsanto Company, Initial Designation of Expert Witnesses

Monsanto hereby designates the following persons who may be called as expert witnesses and (1) who have been retained by Defendant and/or other Defendants in this cause, or (2) who may provide testimony in the nature of expert or opinion type testimony despite the fact that they are not "retained experts." This designation is served based upon the pleadings and discovery responses served by Plaintiff to date. Defendant reserves the right to supplement this designation as discovery progresses and as Plaintiff continues to supplement discovery and appear for independent medical examinations, if any. Defendant reserves the right to amend and supplement this Designation. This designation shall also serve as Monsanto's supplementation of applicable responses to requests for disclosure and interrogatories.

1. Dr. John Craighead
Department of Pathology
University of Vermont
College of Medicine
Burlington, Vermont 05405
(802) 425-3480

Dr. Craighead is a medical doctor and pathologist and may testify concerning the state of medical knowledge, at relevant points in time, regarding the effects of exposure to asbestos.

2. Mr. John A. Pendergrass
6700 Milkhouse Court
Mobile, Alabama 36695

Mr. Pendergrass is an industrial hygienist and may testify concerning industry practice and standards, state of the art of industrial hygiene, and state of knowledge concerning exposure to asbestos and effects thereof at relevant times, and may testify concerning the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos.

3. J. LeRoy Balzer, Ph.D.
408 Horse Trail Ct.
Alamo, California 94556

Dr. Balzer is an industrial hygienist and may testify concerning industry practice and standards, state of the art of industrial hygiene, and state of knowledge concerning exposure to asbestos and effects thereof at relevant times, and may testify concerning the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos.

4. B. K. Kwon, M.S.P.H.
601 Montrose Rd., Suite 509
Rockville, MD 20852

Mr. Kwon is an industrial hygienist and may testify concerning industry practice and standards, state of the art of industrial hygiene, and state of knowledge concerning exposure to asbestos and effects thereof at relevant times, and may testify concerning the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos.

5. Mr. Lawrence R. Birkner, CIH, CSP
2026 El Monte Drive
Thousand Oaks, CA 91362
(805) 494-8173

Mr. Birkner is an industrial hygienist and may testify concerning industry practice and standards, state of the art of industrial hygiene, and state of knowledge concerning exposure to asbestos and effects thereof at relevant times, and may testify concerning the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos.

6. James T. Knorpp, PE, CSP
2149 Misty's Run
Keller, TX
(817) 379-0840

Mr. Knorpp is a safety professional and professional engineer and may testify concerning his education, training and experience, as well as his factual observations and mental impressions and opinions and the basis for them, in the following areas: the creation, role and significance of OSHA, and relevant rules and regulations, concerning asbestos products in the work place; the process of establishing, historical development, and

significance of maximum allowable concentrations, permissible exposure limits, threshold limit values, regulatory standards, and similar concepts, in general and specifically with regard to asbestos at relevant times and the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos; employer's responsibility for employee/worker work site conditions and safety, including the employer's role in connection with OSHA. Mr. Knorpp may also testify regarding matters in response to testimony of Plaintiffs' experts.

7. Dr. Mark R. Wick, M.D., FCAP
University of Virginia Health System
Department of Pathology
Box 214
O.M.S. Building, Room 2882
Charlottesville, VA 22908
(804) 924-9038

Dr. Wick is a medical doctor and pathologist and may testify concerning his education, training and experience, as well as his factual observations and mental impressions and opinions and the basis therefor, in the following areas: historical developments regarding asbestos utilization; medical aspects of asbestos-related diseases; state of the art in medicine and state of medical knowledge, at relevant points in time, concerning asbestos and asbestos exposure and the effects thereof; relevant medical and scientific literature; the diagnostic criteria used to diagnose asbestos-related diseases; the relative risk, as well as reasonably perceived risk during relevant periods of time, from various levels of potential exposure to asbestos, as well as particular type of asbestos fiber involved; existence of a dose-response relationship and the concept of threshold levels for asbestos-related diseases; and the rate of occurrence or incidence of certain diseases in given populations. Dr. Wick may also review Plaintiffs' medical records and may also review, examine and/or analyze pathology material, including tissue samples and/or blocks and/or slides, and may opine as to the appropriate diagnosis of Plaintiffs' alleged diseases as well as their etiology. Dr. Wick may also testify regarding matters in response to testimony of Plaintiffs' experts.

8. Dr. William L. Dyson, Ph.D, CIH
Workplace Hygiene, L.L.C.
1022 Jefferson Road
P.O. Box 49176
Greensboro, NC 27410-1642

Dr. Dyson is an industrial hygienist and safety professional and may testify concerning his education, training and experience, as well as his factual observations and mental impressions and opinions and the basis for them, in the following areas: properties, use of

and historical developments concerning asbestos and asbestos-containing products; industry practice and standards in general and specifically concerning industrial hygiene and asbestos; state of knowledge concerning exposure to asbestos and effects thereof at relevant times; the process of establishing, historical development and significance of maximum allowable concentrations, permissible exposure limits, threshold limit values, regulatory standards, and similar concepts, in general and specifically with regard to asbestos at relevant times and the reasonableness of reliance upon established acceptable and safe levels of exposure to asbestos products during relevant periods of time; how potential exposure levels from various activities compared to then existing threshold limit values at relevant times; employer's responsibility for employee/worker work site conditions and safety; and the reasonableness of petrochemical premises owner's conduct during relevant periods of time. Dr. Dyson may offer opinions relating to the levels of asbestos exposure necessary to attribute the development of mesothelioma to any particular occupational exposure. Dr. Dyson may also testify regarding matters in response to testimony of Plaintiffs' experts. The basis for Dr. Dyson's mental impressions and opinions are his education, training, and experience, his review of pertinent literature, and his review of additional information pertinent to Plaintiffs' and/or this case.

9. Dr. Patrick N. Conoley, M.D.
Kelsey Seybold Clinic
6624 Fannin, Suite 1800
Houston, TX 77030

Dr. Conoley is an M.D. and a "B" reader, who may testify concerning his review of the radiographs and CT scans of Plaintiffs in this case and the significance of various x-ray findings on the radiographs of Plaintiffs.

10. Dr. Peter J. Barrett, M.D.
10 Martin's Lane
Hingham, MA 24043
(617) 749-5876

Dr. Barrett is an M.D., is board certified in diagnostic radiology and nuclear medicine and has been a "B" reader from NIOSH since 1984. Dr. Barrett may testify concerning the significance of asbestos related abnormalities and neoplastic disease based upon his review of the radiographs of Plaintiffs as to the presence or absence of radiographic abnormalities related to asbestos and the significance of same.

11. Dr. Gail D. Stockman
703 East Marshall Avenue, Suite 4002
Longview, Texas 75601
(903) 753-0787

Dr. Stockman may testify regarding the pulmonary and respiratory diseases and illnesses alleged by Plaintiffs. More specifically, Dr. Stockman may testify regarding specific medical complaints and history of Plaintiffs' and whether those alleged diseases or illnesses could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Stockman may address issues regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Stockman may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; her opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and her prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. She may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Stockman may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

12. Kim Bloom, M.D.
6550 Fannin, Suite 2403
Houston, Texas 77030
(713) 790-6250

Dr. Bloom is a specialist in pulmonary and respiratory diseases and a certified B-reader. He may testify regarding specific medical complaints and history of Plaintiffs and whether those complaints could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Bloom may also testify regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and

in the future. Dr. Bloom may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; his opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and his prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. He may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Bloom may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

13. Robert M. Ross, M.D.
6550 Fannin Street, Suite 2403
Houston, Texas 77030
(713) 383-6100 (phone)
(713) 383-6103 (fax)

Dr. Ross is a specialist in pulmonary and respiratory diseases and a certified B-reader. He may testify regarding specific medical complaints and history of Plaintiffs and whether those complaints could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Ross may also testify regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Ross may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; his opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and his prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease

process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. He may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Ross may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

14. Venessa Ann Holland, M.D., MPH, P.A.
Environmental Pulmonary Consultants
7515 S. Main Street, Suite 670
Houston, Texas 77030
(713) 799-2224 (Telephone)
(713) 799-2225 (Facsimile)

Dr. Holland may testify regarding the pulmonary and respiratory diseases and illnesses alleged by Plaintiffs. More specifically, Dr. Holland may testify regarding specific medical complaints and history of Plaintiffs' and whether those alleged diseases or illnesses could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Holland may address issues regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Holland may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; her opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and her prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of

various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. She may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Holland may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

15. Scott G. Donaldson, M.D., F.C.C.P
Pulmonary/Critical Care
375 Municipal Drive, Suite 218
Richardson, Texas 75080
(972) 680-0666
(972) 680-2499 (fax)

Dr. Donaldson is a specialist in pulmonary and respiratory diseases. He may testify regarding specific medical complaints and history of Plaintiffs and whether those complaints could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Donaldson may also testify regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Donaldson may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; his opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and his prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. He may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and

disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Donaldson may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

16. Kathryn A. Hale, M.D.
6550 Fannin Street
Smith Tower, Suite 1236
Houston, Texas 77030
(713) 790-2076 (Telephone)
(713) 790-3648 (Facsimile)

Dr. Hale may testify regarding the pulmonary and respiratory diseases and illnesses alleged by Plaintiffs. More specifically, Dr. Hale may testify regarding specific medical complaints and history of Plaintiffs' and whether those alleged diseases or illnesses could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Hale may address issues regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Hale may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; her opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and her prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. She may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Hale may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

17. John R. Holcomb, M.D.
4410 Memorial Drive, Suite 440
San Antonio, Texas 78229
(210) 692-9400

Dr. Holcomb is a specialist in pulmonary and respiratory diseases. He may testify regarding specific medical complaints and history of Plaintiffs and whether those complaints could be or were caused by any alleged exposure to materials from the premises of Defendants. Dr. Holcomb may also testify regarding alleged medical risks to Plaintiffs in the future due to Plaintiffs' alleged exposure to materials from the premises of Defendants and the effects of the alleged illnesses and diseases on Plaintiffs in the past and in the future. Dr. Holcomb may testify as to all matters pertaining to examination of Plaintiffs and/or review of Plaintiffs' medical records, x-rays, and reports and supplemental reports of Plaintiffs' experts; any communications with Plaintiffs or Plaintiffs' family members; the diagnostic criteria used to diagnose asbestos-related diseases; his opinions as to whether Plaintiffs suffer from asbestos-related disease and the basis of such opinions; the Plaintiffs' current medical condition and his prognosis thereof, the anatomy and function of the respiratory and circulatory systems; the natures of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general public. He may also testify as to smoking and its relation to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer. Dr. Holcomb may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

18. I. A. Feingold, M.D.
Chief, Division of Pulmonary Medicine
South Miami Hospital
6200 Southwest 73rd Street
Miami, FL 33143
305-661-4611, Ext. 5229

Dr. Feingold is a specialist in pulmonary medicine and a NIOSH certified "B-reader". Dr. Feingold may testify as to his examination of a plaintiff and/or decedent and/or review of their medical records and x-rays and may offer opinions regarding whether or not the plaintiff/decedent has an asbestos-related disease. Dr. Feingold may also testify concerning the diagnostic criteria used to diagnose asbestos-related diseases and prognosis regarding any medical conditions. Dr. Feingold may also testify about general medical issues and the effects that asbestos and other substances have on human health generally and with respect to plaintiff/decedent specifically.

Dr. Feingold will also testify as to the idiopathic nature of mesothelioma in some individuals. He will also testify that certain other cancers are not in reasonable medical probability related to asbestos exposure based upon the scientific evidence. These will include laryngeal and colon rectal cancers, among others.

Dr. Feingold may also testify concerning the nature and extent of medical and scientific knowledge as it has existed from time to time regarding the association of pulmonary disease with asbestos exposure based upon the medical and scientific literature, and based on that literature, he will testify as to the population and workers perceived to be at risk of asbestos disease as literature has developed over time. He will also testify concerning the methods of diagnosis, the incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic workers and to the general public. He will also testify to smoking and its relation to cancer of the lung and cancer of other parts of the body. He will further testify concerning the lack of relationship between the presence of pleural plaques and later development of any form of cancer and the necessity for an underlying diagnosis for pulmonary asbestosis in order to attribute lung cancer to asbestos exposure. Dr. Feingold may offer testimony in response to any reports or testimony offered by Plaintiffs' experts.

Dr. Feingold's C.V. has previously been provided to Plaintiffs' counsel. If another copy is desired, Defendant will, on request, provide one.

Defendant also designates the following witnesses to testify through their deposition and/or trial testimony from other cases:

1. Dr. Emmett Kelly testified by deposition, and at trial, in the case of Rita Mae Schmidt, et al. v. A.C. & S., et al.; No. D-145,280; In the District Court of Jefferson County, Texas; 136th Judicial District. Dr. Kelly's testimony, both at trial, and on deposition, is designated here only to the extent that he gave expert or opinion type testimony in that deposition.
2. Mr. Jack T. Garrett in the case of Rita Mae Schmidt, et al. v. A.C. & S., et al.; No. D-145,280; In the District Court of Jefferson County, Texas; 136th Judicial District. Mr.

Garrett's deposition testimony is designated here only to the extent that he gave expert or opinion type testimony in that deposition.

3. Joe Shrode in the case of Claude J. Tomplait v. Combustion Engineering, et al.; U.S. District Court for the Eastern District of Texas, Beaumont Division; and/or in Samuel R. Porter v. Fibreboard Corporation, et al., also in the U.S. District Court for the Eastern District of Texas, Beaumont Division, and/or Mr. Shrode's deposition testimony in the Clarence Borel trial, also in the U.S. District Court for the Eastern District of Texas.
4. Dr. Corwin Hinshaw, expert regarding state of the medical art, in the cases of Jimmie L. Vaughan v. Johns-Manville, CA-3-01-0070-F, USDA, N.D. Tex; Antonio Mendoza, et al v. Fibreboard Corporation, et al., CA.-2-80-006, USDC, N.D. Tex; In Re: Related Asbestos Cases, C-83-6251-RFP, USDC, N.D. Calif.

Defendant also designates any and all expert witnesses designated herein by Plaintiffs.

Defendant also designates any and all expert witnesses designated herein by other Defendants.

Defendant would also refer to and incorporate herein by reference each of the reports submitted, or to be submitted by Defendant's experts, copies of which have been or will be provided to Plaintiffs' counsel by Defendant or other Defendants herein.