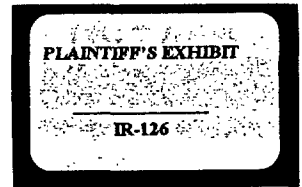


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IN RE #94CI10078

IN RE: ASBESTOS LITIGATION

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IN THE DISTRICT COURTS

AND THE COUNTY COURTS

BEXAR COUNTY, TEXAS

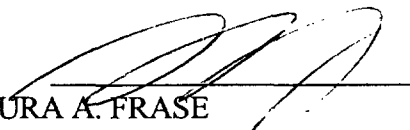
TO: Plaintiffs by and through their attorney of record, Russell W. Budd, Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219, Gayle Mortola Waters & Kraus, 3219 McKinney Avenue, Suite 3000, Dallas, Texas 75204

**DEFENDANT INGERSOLL-RAND COMPANY'S
EXPERT AND FACT WITNESS LIST**

COMES NOW, Defendant Ingersoll-Rand Company, in the above entitled and numbered cause, and pursuant to the scheduling order in this cause submits its Expert and Fact Witness List in the above-captioned matter.

Respectfully submitted,

**FORMAN, PERRY, WATKINS,
KRUTZ & TARDY, PLLC**

By: 

LAURA A. FRASE

State Bar No. 07391950

ARTHUR GRIMALDO, II

State Bar No. 24002186

THOMAS W. TARDY, III

State Bar No. 24026062

1349 Empire Central, Suite 400

Dallas, Texas 75247

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ATTORNEYS FOR DEFENDANT,
INGERSOLL-RAND COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Ingersoll-Rand Company's Witness List was furnished to Plaintiffs' counsel via certified mail return receipt requested, on this 22nd day of February, 2002.



LAURA A. FRASE

INGERSOLL-RAND COMPANY'S EXPERT & FACT WITNESS LIST

1. Dr. Elvin Adams
General Conference of SDAs
6840 Eastern Avenue, N.W.
Washington, D.C.20012

Dr. Adams may testify regarding asbestos-related diseases' effects, and particularly smoking's effects on such diseases.

2. Oscar Auerbach, M.D.
158 Long Hill Drive
Short Hills, New Jersey 07078

May testify about the plaintiff's medical condition and pathology and about asbestos-related diseases.

3. Howard E. Ayer
Department of Environmental Health
College of Medicine
Kettering Laboratory (056)
University of Cincinnati
Cincinnati, Ohio 45267

Mr. Ayer may testify to matters regarding industrial hygiene in general and industrial hygiene practices regarding asbestos exposure in specific industries and/or job functions. He may testify regarding the development and use of threshold limit values and the promulgation of state and federal regulations concerning the use of asbestos and exposure to asbestos in occupational settings. He may testify regarding medical and technical state of the art, and scientific knowledge regarding asbestos, asbestos exposure and related industrial hygiene practices. He may testify regarding the state of knowledge of his field, including the development of scientific knowledge concerning the relationship between exposure to asbestos at various levels and disease, the development of standards and regulations applicable to asbestos, the development of industrial hygiene procedures and technology and the role and impact of various studies, standards, regulations, reports and commentators. He may also testify regarding results of air sampling with respect to fiber release/friability of various asbestos-containing products, fiber drift, and the relative fiber release capability and relative exposure to

respirable asbestos of certain types of asbestos fibers and asbestos-containing products. Further he may testify regarding the probable time period(s) of causation of the disease mesothelioma and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

4. Dr. Stephen M. Ayers
St. Louis University School of Medicine
1325 S. Grand Avenue
St. Louis, Missouri 63104

Dr. Ayers is a pulmonary specialist. He may testify to matters pertaining to the history of scientific knowledge, research and study concerning exposure to asbestos and its effects on the human body; all state-of-the-art issues; safe levels of asbestos exposure and the basis for such opinion; exposure to asbestos in regards to development of respiratory diseases, including, but not limited to asbestosis, lung cancer, and mesothelioma; and the effects of exposure to chrysotile fiber and other asbestos fibers.

5. Dr. Bob Baird
3600 Gaston #806
Wadley Tower
Dallas, Texas 75246

Dr. Baird may testify concerning his examination and diagnosis of the physical condition of the particular plaintiffs and the relationship, if any, to the plaintiff's exposure to asbestos. This doctor may also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, and Gaensler.

6. J. Leroy Balzer, Ph.D.
408 Horse Trial Court
Walnut Creek, CA 94595
(510) 274-0826

Dr. Balzer is an industrial hygienist who may testify regarding evaluation of exposure of individuals to asbestos-containing products, evaluation and application of industrial hygiene studies of asbestos, the nature, properties, and application of asbestos and asbestos-containing products, and germane industrial hygiene issues. Dr. Balzer may also testify

regarding applicable threshold values and government regulations related to asbestos. He may discuss testing of asbestos-containing products. Dr. Balzer will have the benefit of the technical construction reports related to the Colbert Steam Plant and may be expected to offer testimony and opinions related to these materials.

7. Peter Barrett, M.D.
10 Martin's Lane
Highman, MA 02043

Dr. Barrett is a 'B' Reader and may testify regarding the radiographs of the plaintiffs and/or plaintiffs' decedents.

8. 2451 Fillingham St.
10th Floor, Suite H
Mobile, AL 36617

Dr. Bass may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the name of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with disability and life expectancy; the toxicity of various asbestos fibers; the difference between impairment and disability and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer. Further, he may testify about plaintiffs' medical condition.

9. Dr. Joseph Bates
5 Glenridge Road
Little Rock, Arkansas 72202

Dr. Bates may testify about the medical condition of the plaintiffs and about asbestos-related diseases. Further, he may testify about the areas described for witnesses Demopoulos Hinshaw, Weill, Craighead, Gaensler, and Kerby.

10. Charles Blake
Clayton Group Services, Inc.
400 Chastain Court, N.W., Suite 490
Kennesaw, GA 30144
(770) 499-7500

Mr. Blake is an expert in mineralogy, metallurgy & ceramic engineering. He may offer testimony about the conversion of chrysotile asbestos to non-fibrous, benign materials known as forsterite and enstatite when exposed to temperatures typically found in an industrial setting requiring the use of refractory materials. He may also testify concerning those areas described for witnesses Drs. Bradt, Kadunc, Moore and Verna.

11. Dr. Kenneth J. Bourdreaux, pH
Mr. Dan M. Cliffe
Mr. J. Stuart Wood
Consulting Economists
A. B. Freeman School of Business
Tulane University
1424 Bordeaux
New Orleans, Louisiana 70115
(504) 865-5410

Dr. Bordeaux and Messrs. Cliffe and wood are economic consultants. They may testify regarding economic damages.

12. Brian Bradley, M.D.
The Lung Center
4003 Woodlawn
Pasadena, Texas 77504
(713) 941-0088

Dr. Bradley is board certified in the areas of internal medicine, pulmonary medicine, preventative medicine, occupational medicine, and geriatrics. He may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may testify about general medical issues with an emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to the plaintiff specifically. Dr. Bradley may testify about the areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

13. Ben V. Branscomb, M.D.
The University of Alabama at Birmingham
1717 6th Avenue South
Birmingham, AL 35233-7201

Dr. Branscomb is a pulmonologist and 'B' reader and may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify about those areas described for witnesses Demopolous, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

14. Kevin Brown, M.D.
66a Warwick Way
London, England SW1V1RZ

Dr. Browne may testify regarding cancer issues, e.g., cancer risk, relationship between asbestosis and lung cancer, carcinogenicity of worksite and environmental chemicals and substances, and epidemiology. In addition, Dr. Browne may testify about general and asbestos-related pulmonary medicine issues and epidemiology relevant thereto. Further, Dr. Browne may testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and to the time period in which defendant could have known end users were at risk.

15. Louis Burgher, M.D., Ph.D.
4242 Farnam Street
Omaha, NE 68131
(402) 552-3452

Dr. Burgher may testify regarding state of the art in asbestos-related diseases, asbestos-related diseases in general, the medical condition of plaintiffs, epidemiology and general medicine regarding asbestos exposure. He may also testify concerning his review of any medical records or x-rays available and his opinion concerning whether certain plaintiffs have or had an asbestos-related disease and the nature and extent of any such disease. He may also testify about the probable time periods(s) of asbestos exposure with relation to the cause of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Pet, Seidman and Selikoff, Morgan, and Lampshear, among others.

16. Dr. David Burns
University of California at San Diego
USCD Medical Center
Pulmonary Research Lab
200 W. Arbor Drive
San Diego, CA 92103
(619) 543-5986

Dr. Burns is a pulmonologist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. He may also testify about those areas described for witnesses Demopolous, Hinshaw, Weill, Craighead, and Gaensler.

17. Dohrman H. Byers

Mr. Byers was the Chief of Analytical Chemistry Service, United States Department of Public Health from 1948 through 1959. He may testify about how he and the United States Public Health Service determined how to apply the threshold limit value for asbestos during the period of time in which he occupied that position.

18. Dr. Sam H. Cade, Jr.
Radiology Department
Baylor University Medical Center
3500 Gaston Avenue
Dallas, Texas 75242
(214) 820-0111

Dr. Cade is a "B" Reader and may testify regarding the radiographs of the plaintiffs and/or plaintiffs' decedents.

19. Dr. Phillip Cagle
Baylor College of Medicine
Department of Pathology
6565 Fannin, MS 205
Houston, Texas 77030
(713) 798-3671

Dr. Cagle may testify about his review of the plaintiffs' work history, medical records, including tissue and pathology, medical condition and about asbestos-related diseases. He may testify as a general medical witness and may give testimony regarding the diagnosis or lack of a diagnosis of an asbestos-related disease and the etiology of such disease. He may also testify regarding the absence of any increased risk of cancer suffered by the plaintiffs as a result of exposure to asbestos products. He may also testify regarding the pathology and pathogenesis of malignant mesothelioma and other asbestos related diseases as they may relate to exposure to various types of asbestos fibers. Moreover, he may testify about matters raised by experts called by plaintiffs and co-defendants.

20. Greg Casar, M.D.
6550 Fannin, Suite 2403
Houston, TX 77030
(713) 790-6250

Dr. Casar is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

21. Dr. Andrew Marc Churg
Department of Pathology
University of British Columbia
2211 Westbrook Mall
Vancouver B.C., Canada V6TIW5
(604) 228-7111

Dr. Churg is a pathologist who may testify concerning the diagnosis or lack thereof of an asbestos-related disease based upon the medical records of plaintiffs, including, but not limited to, tissue and/or slides. Further, he may testify on matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of plaintiffs in these cases specifically.

22. Dr. Joseph Cimino
New York Medical College
50 Willard Avenue
North Tarrytown, New York 10591

Dr. Cimino is presently Professor and Chairman of the Department of Community and Preventative Medicine, New York Medical College, Valhalla, New York. Dr. Cimino may also testify generally about research in the area of pulmonary pathology and about the process by which medical knowledge evolved. He may also testify regarding the state of medical knowledge from the early part of the century to the middle 1960's as it regards pathological changes due to exposure to

asbestos. This defendant believes that Dr. Cimino is of the opinion that prior to the 1960's the state of the medical art was that exposure to large amounts of asbestos over an extended period of time could cause asbestosis; however, there was an accepted, safe level of exposure below which there was no risk of harm; that this level was accepted by the medical and scientific community; and that there was no acceptance of a link between asbestosis and mesothelioma or any form of cancer until the 1960's. The opinions of Dr. Cimino are based upon his training in medicine, his extensive professional qualifications, his research in pulmonary pathology and his review of the relevant medical literature. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

23. Jacqueline Coalson, Ph.D.
Department of Pathology
University of Texas Health Science Center
7703 Floyd Curl Drive
San Antonio, Texas 78284-7750
(210) 567-4000

Dr. Coalson is a pathologist who may testify concerning the aspects of pathology as it relates to malignant disease, special histologic techniques for diagnosis of malignant diseases, the morphology of malignancies, the relationship between asbestos exposure and malignancies, the causation of specific types of malignancy with an emphasis on the potential causative role of asbestos exposure, and the toxicity of various asbestos fibers. Dr. Coalson may be asked to review pathologic material relevant to these cases and render opinions on same.

24. Dr. Thomas Colby
Mayo Clinic, Pathology Department
13400 East Shea Boulevard
Scottsdale, Arizona 85259
(602) 301-7099

Dr. Colby may testify as to asbestos-related diagnostic, prognostic and causative issues of general medicine, pathology issues relevant to these same matters and on cancer diagnosis and causation as related to asbestos exposure, and the toxicity of various asbestos fibers. He may also respond to matters raised by plaintiffs within his field of expertise. Dr. Colby may be asked to review pathologic material relevant to those cases and render opinions on same.

25. Dr. William S. Cole
821 Sunnybrook
Melbourne, Florida 32935

Dr. Cole is a "B" reader and will testify regarding the radiographs of the plaintiffs and/or plaintiffs' decedents.

26. Dr. W. Clark Cooper
Lafayette, LA

Dr. Cooper is a certified industrial hygienist and specialist in occupational medicine. He may testify regarding air sampling and testing of asbestos-containing products. He may discuss general industrial hygiene issues and various government regulations on asbestos.

27. Dr. Bobby F. Craft
Industrial Health, Inc.
640 East Wilmington Avenue
Salt Lake City, Utah 84106

Dr. Craft may testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases in the late 1960's or early 1970's.

28. John E. Craighead, M.D.
1845 Four Winds Road
Ferrisburgh, Vermont 05456
(802) 656-3131
(802) 425-3480

Dr. Craighead may testify about his review of the plaintiffs' work history, medical records, including tissue and pathology, medical condition and about asbestos-related diseases. He may also testify as a general medical witness and may give testimony regarding the diagnosis or lack of a diagnosis of an asbestos-related disease and the etiology of such disease. He may also testify regarding the absence of any increased risk of cancer suffered by the plaintiffs as a result of exposure to asbestos products. He may also testify regarding the pathology and pathogenesis of malignant mesothelioma and other asbestos-related diseases as they may relate to exposure to various types of asbestos fibers. Moreover, he may testify about matters raised by experts called by plaintiffs and co-defendants.

29. James Crapo, M.D.
4650 South Forest St.
Englewood, CO 80110
(303) 221-6695

Dr. Crapo is a board certified pulmonologist who may testify concerning the requirements for diagnosis of an asbestos-related disease, progression of such disease, the meaning of pleural change, the correct reading of x-rays, dose response, cancer etiology and epidemiology relating to asbestos exposure, and the effect of smoking in relation to cancer and asbestos. He may testify regarding what is necessary in order for asbestos to play a role in cancer causation. Dr. Crapo may testify as to general medical principles pertaining to asbestos exposure and asbestos related disease and the toxicity of various asbestos fibers. He may also testify about asbestos inhalation studies and other asbestos exposure studies, their meaning, progression aspects, cellular responses and related matters. He may testify about various studies including studies from refineries, shipyards, steel mills, and other places, relating to cancer risk from asbestos and other substances, and etiology pertaining to lung and other types of malignancies.

30. Dr. George L. Delclos
Respiratory Consultants of Houston
6550 Fannin, No. 2403
Smith Tower
Houston, Texas 77030
(713) 790-6250

Dr. Delclos may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

31. Harry Demopolous, M.D.
New York University Medical Center
550 First Avenue
New York, New York 10016
(212) 263-6314

Dr. Demopolous may testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony may be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system. He may testify about the medical condition of plaintiffs and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between presence of pleural plaques and a later development of any form of cancer. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

32. Scott R. Donaldson
North Texas Pulmonary Associates
375 Municipal Drive, Suite 140
Richardson, Texas 75080
(214) 680-0666

Dr. Donaldson may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

33. Dr. Charles Henry Drummond, III
Department of Ceramic Engineering
Ohio State University
2041 College Road
Columbus, OH 43210
(614) 292-2651

Dr. Drummond is an associate professor in the Department of Ceramic Engineering at Ohio State University. He may testify regarding the physical characteristics of asbestos-containing products as well as the history and feasibility of substitute ingredients.

34. Dr. Michael Ellenbecker
Mechanical Engineering Department
Engineering School
University of Lowell
One University Avenue
Lowell, MA 01854
(978) 934-2950

Dr. Ellenbecker is an industrial hygienist who may testify about asbestos and the work sites at issue.

35. William Emory, M.D.
Ochsner Clinic
1514 Jefferson Highway
New Orleans, Louisiana
(504) 838-4078

Dr. Emory may testify about the medical condition of the plaintiffs and about asbestos-related diseases. Further, he may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the difference between impairment and disability; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

36. William Eschenbacher, M.D.
Baylor College of Medicine
Department of Internal Medicine/Pulmonary Section
6550 Fannin
Smith Tower #1220
Houston, TX 77030
(713) 790-3265

Dr. Eschenbacher may testify regarding the medical condition of the plaintiffs and about asbestos-related diseases. He may testify about general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiffs specifically. He may testify about those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

37. William M. Ewing, C.I.H.
Compass Environmental, Inc.
2231 Robinson Road, Suite B
Marietta, Georgia 30068
(770) 590-7067

Mr. Ewing is an industrial hygienist who may testify about asbestos generally.

38. Dr. Stanley B. Fiel
Chief, Pulmonary Disease and Critical Care Section
Medical College of Pennsylvania
3300 Henry Avenue
Philadelphia, PA 19129
(215) 762-7013

Dr. Fiel may testify about his review of the plaintiffs' work history, medical records and the records in these cases. As a specialist in pulmonary medicine, Dr. Fiel may testify regarding the general physiology of the respiratory system, the effects of the inhalation of asbestos dust as applied to the actual symptoms and x-rays relating to the plaintiffs, and his opinion/diagnosis concerning the plaintiffs. He may testify about the meaning and specifics, if any, of the existence of pleural plaques. He may also testify about any matter raised by experts called by the plaintiffs or any co-defendants.

39. Gregory Foster, M.D.
North Texas Pulmonary Associates
375 Municipal Drive, Suite 140
Richardson, Texas 75080
(972) 680-0666

Dr. Foster may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

40. Robert G. Fraser, M.D.
2766 Summit Circle
Birmingham, AL 35216
(205) 979-1123

Dr. Fraser is a board certified radiologist who practices in Birmingham, Alabama. Dr. Fraser may testify regarding the evaluation of plaintiffs' chest x-rays, their medical condition and about asbestos-related diseases.

41. Edward Gaensler, M.D.
Boston University Medical Center
80 East Concord Street
Boston, Massachusetts 02118
(617) 638-8000

Dr. Gaensler is a thoracic surgeon. He may testify about the medical condition of plaintiffs and about asbestos-related diseases. Likewise, he may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

42. Joe G. N. Garcia, M.D.
Department of Medicine
Wilshire Memorial Hospital
Indianapolis, Indiana 46202
(203) 785-4195

Dr. Garcia may testify about the medical condition of the plaintiffs and about asbestos-related diseases.

43. Bernard Gee, M.D.
Yale University School of Medicine
Pulmonary & Critical Care
Department of Internal Medicine
105LCI, P.O. Box 208057
New, CT 06520-8057
(203) 785-4195

Dr. Gee is a pulmonologist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. He may also testify about those areas described for witnesses Demopolous, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

44. Alan Gibbs, M.D.
Department of Pathology
Landough Hospital
Penarth Glamorgan
United Kingdom CF71XX

Dr. Gibbs is a pathologist who may testify concerning the diagnosis or lack thereof of an asbestos-related disease, based upon the medical records of plaintiffs, including but not limited to, tissue and/or slides that he will review. Further, he may testify on matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of the plaintiffs in these cases specifically.

45. Allen Goldstein, M.D.
Pulmonary Medicine Associates, P.C.
860 Montclair Road, Suite 862
Birmingham, Alabama 35213
(205) 802-2000

Dr. Goldstein is a pulmonologist who may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records, and about asbestos-related diseases and the toxicity of various asbestos fibers.

46. Ronald Gots, M.D.
National Medical Advisory Service
7315 Wisconsin Avenue, Suite 802 West
Bethesda, MD 20814-3292
(301) 230-2999

Dr. Gots may testify as to what and when doctors and manufacturers knew, or should have known about the dangers of asbestos exposures, not only to persons working in the plants but also to those coming into contact with finished products such as insulators, pipefitters and others working in close proximity to the installation or removal of asbestos-containing materials. He may testify regarding areas described for witnesses Craighead, Demopolous, Churg, Weill, Hinkes, Gaensler and Rabinovitz.

47. Michael A. Graham, M.D.
Division of Forensic and Environment Pathology
St. Louis University School of Medicine
3556 Caroline Street - Room C-305
St. Louis, Missouri 63104
(314) 577-8298

Dr. Graham may testify regarding the pathology of lung disease, and the fiber burden imposed upon lung tissue based on varying intensities, and duration of exposure to dusts, including asbestos dust and the toxicity of various asbestos fibers. He may give testimony and opinions regarding the medical condition of certain plaintiffs and whether the plaintiff's medical condition was proximately caused by exposure to asbestos-containing products. He may also testify regarding any asbestos-related disease in certain plaintiffs, including but not limited to pleural changes, asbestosis and lung cancer. He may review and provide testimony on pathology on any given plaintiff.

48. Dr. Donald Greenburg
One Baylor Plaza
Baylor College of Medicine
Houston, TX 77030
(713) 723-9041
or

Methodist Hospital
Department of Pathology
6565 Fannin, Second Floor
Houston, Texas 77030
(713) 790-2370 or (713) 798-4661

Dr. Greenberg may testify about asbestos-related diseases and the effect of other substances such as cigarette smoke upon the respiratory system. He may also testify as to the pathology of the plaintiffs and/or plaintiffs' decedents.

49. Milton Grey, M.D.
521 Crestbend
Houston, Texas

Dr. Grey is a specialist in internal medicine. He may testify about the structure and function of the respiratory system, the effects of cigarette smoking, and the diseases of the lungs, including asbestos-related diseases.

50. Kathryn A. Hale, M.D.
6550 Fannin, Suite 1236
Houston, TX 77030
(713) 528-4842

Dr. Hale is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on her examination of the plaintiffs and/or review of the plaintiffs' medical records and x-rays and about asbestos-related diseases. She may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy ; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

51. Dr. Russell M. Harley
Medical University of South Carolina
171 Ashley Avenue
Charleston, South Carolina 29401
(803) 792-4444

Dr. Harley is a physician who is an expert in the fields of pathology and etiology and diagnosis of asbestos-related disease based upon review of tissue and tissue slides obtained as a result of biopsy or autopsy. He may testify concerning matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of plaintiffs or plaintiffs' decedents in these cases specifically. Further, he may testify concerning the diagnosis or lack thereof of an asbestos-related disease based upon the medical records of plaintiffs, including, but not limited to, tissue and/or slides.

52. Brent Harrison, M.D.
Department of Radiology
University of Mississippi Medical Center
2500 North State Street
Jackson, Mississippi
(601) 984-2515

Dr. Harrison is a "B" Reader and may testify regarding the radiographs of plaintiffs and/or plaintiffs' decedents and plaintiffs' medical condition. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the difference between impairment and disability and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

53. Willis Hazard
3609 Mapleway Drive
Toledo, OH
(419) 382-7348

Mr. Hazard may testify regarding industrial hygiene and threshold limit values, and product testing, product and/or documentary issues relevant to defense of plaintiff(s)' claims.

54. Peter Heidbrink, M.D.
Southwest Pulmonary Associates
2001 North MacArthur Blvd., #660
Irving, TX 75061
(972) 259-3221

Dr. Heidbrink is a specialist in the area of respiratory diseases. He may testify about the medical condition of the plaintiffs and about asbestos related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

55. Dr. Michael Henderson
330 Rittiman Road
San Antonio, TX 78209

Dr. Henderson may testify concerning the relationship of asbestos and smoking to the development of cancer. Dr. Henderson may also testify concerning the incidence of lung cancer among individuals with asbestosis or exposure to asbestos-containing insulation products.

56. John Higginson, M.D.
Department of Community & Family Medicine
314 Kober-Cogan Hall
Georgetown University Medical Center
3750 Reservoir Rd., N.W.
Washington, DC 20007
(202) 687-2000 or (202) 687-1600

Dr. Higginson may testify regarding the protocol, methodology, and analysis of cancer experimentation and research; custom and practice regarding peer review and the editing of scientific work; and medical knowledge regarding asbestos. He may also testify that an asbestos dust inhalation experiment sponsored by QAMA and undertaken by Saranac Laboratory did not support the proposition that asbestos

caused cancer. He may testify about medical knowledge regarding the health effects of asbestos

57. Elliot Hinkes, M.D.
301 N. Prairie Avenue, Suite 311
Englewood, California 90301
(213) 674-0050

Dr. Hinkes is a board certified oncologist and hematologist. Dr. Hinkes may testify generally about the risks of asbestos related cancer, depending upon different levels of exposure, periods of exposure and occupation, whether asbestos exposure is medically and scientifically linked on a cause-and-effect basis with various types of cancer, whether exposure to specific amounts of asbestos is a substantial factor in causing the particular cancer, risks of cancer from carcinogens other than asbestos, including the risk of cancer from cigarette smoking and other industrial pollutants, and changes in the risk of cancer resulting from the cessation of cigarette smoking or cessation of asbestos exposure. Dr. Hinkes will offer his opinion about whether lung cancer in the absence of asbestosis in a particular individual can be causally linked to asbestos exposure, whether asbestos exposure is causally linked to cancers other than lung cancer and mesothelioma, and the fiber type of asbestos causally linked to mesothelioma. Where appropriate, Dr. Hinkes will also testify to an apportionment of causation between asbestos exposure and cigarette smoking. Dr. Hinkes will also testify regarding the state and development of scientific and medical knowledge regarding health hazards associated with asbestos. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

58. Dr. H. Corwin Hinshaw
450 Sutter Street
San Francisco, California

Dr. Hinshaw may testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system. He may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments;

methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the history of knowledge of asbestos related diseases; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

59. John R. Holcomb, M.D.
4410 Medical Drive, Suite 440
San Antonio, TX 78229
(210) 692-9400

Dr. Holcomb is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and x-rays and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lungs; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

60. Dr. Thomas Peter Howard
Osler Clinic of Medicine
Pulmonary Director
930 South Harbor City Boulevard, Suite 300
Melbourne, Florida 32901
(407) 725-5050

Dr. Howard is an expert in the field of pulmonary medicine. He is board certified in internal medicine and pulmonary medicine and has been certified by NIOSH as a "B" Reader. Dr. Howard may testify on matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of plaintiffs in these cases specifically. Further, he may testify concerning the effect or the lack thereof of asbestos on the lungs of persons occupationally exposed to asbestos and the pulmonary condition of plaintiffs based upon medical records, including, but not limited to, pulmonary function tests and chest x-rays. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure

to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

61. William Hughson, M.D.
3969 4th Avenue, Suite
San Diego, CA 92103
(619) 294-6206

Dr. Hughson may testify on the scientific and medical state of the art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. He may also testify regarding epidemiology and general medicine regarding asbestos exposure. He may also testify about the probable time period(s) of asbestos exposure with relation to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to the last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

62. Dr. David Jarvis
First Scoville Medical Group
345 24th Avenue, North
Suite 201
Nashville, Tennessee 37203
(615) 385-4209

Dr. Jarvis is a pulmonologist who may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records, and about asbestos-related diseases.

63. Dr. Stephen Jenkins on, M.D.
UT Health Science Center at San Antonio
7703 Floyd Avenue Drive
San Antonio, TX 78284-7885
(210) 567-7000

Dr. Jenkins on may testify concerning his examination and diagnosis of the physical condition of the plaintiffs and the relationship, if any, of the plaintiffs' exposure to asbestos. He may also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

64. Robert Jones, M.D.
Tulane Medical Center
1430 Tulane Avenue [or 1700 Perdido Street]
New Orleans, Louisiana 70112
(504) 588-5265

Dr. Jones is a pulmonary specialist who may testify concerning all aspects of asbestos-related disease, epidemiology, and fear of cancer. Dr. Jones may review records for particular plaintiffs in these cases and render opinions on the health and diseases of such plaintiffs. Dr. Jones may testify regarding those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler, and Kerby. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

65. Donald A. Kadunc, Ph.D., F.E.
Kadunc Engineering
5841 Tara Hill Drive
Dublin, Ohio 43017
(614) 792-2245

Dr. Kadunc, an expert in mineralogy, metallurgy and ceramic engineering, may testify about the conversion of chrysotile asbestos to non-fibrous, benign materials known as forsterite and enstatite when exposed to temperatures typically found in an industrial setting requiring the use of refractory materials. He may also testify concerning the structural and chemical properties and characteristics of the various types of asbestos. He may also testify concerning medical and technical state of the art and scientific knowledge with respect to asbestos and asbestos exposures. He may also testify concerning several varieties of castable refractory products which, in their pre-installation form, contain small quantities of chrysotile asbestos which, when combined with other mineral constituents, result in agglomerates of numerous particles, but do not yield free, respirable asbestos fibers in an airborne state. He may also testify concerning the manufacture, composition, and use of refractory materials, the history of refractory materials, and the use of asbestos in refractory materials. The witness will base his testimony on his education, experience, research and review of relevant medical, scientific, and technical literature concerning the above topics.

66. Gerald Kerby, M.D.
University of Kansas Medical Center
3901 Rainbow Blvd.
Kansas City, KS 66160-7381
(913) 588-6044

Dr. Kerby may testify concerning the anatomy and function of the respiratory and circulatory system; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestos on disability and life expectancy; the toxicity of various asbestos fibers; the lack of a relationship between the presence of pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical communities' awareness of the increased risks for an asbestos-related disease in the cases of prolonged exposure. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

67. Alexander Kusko, Sc.D.P.E.
Director, FaAA Electrical Corporation
115 Flanders Road
Westborough, Massachusetts 01581

Mr. Kusko may testify about the size, construction, layout and working environment of power plants such as those where a number of the plaintiffs may have worked. As an electrical engineer with extensive experience in the construction of power plants, Mr. Kusko may testify about the nature of the working environment in such locations. He may testify about the relevant amounts of insulation used in various parts of the plants.

68. Dr. Robert Lampert
Baylor College of Medicine
Department of Internal Medicine/Pulmonary Section
6550 Fannin, Suite 1220
Houston, TX 77030
(713) 790-2076

Dr. Lampert may testify regarding the medical condition of the plaintiffs and/or plaintiffs' decedents.

69. Jeffrey S. Lee, M.D.
Building 512
University of Utah
Salt Lake City, Utah 84112
(801) 581-7107

Dr. Lee may testify regarding state of the art and that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos-related diseases in the late 1960's or early 1970's.

70. Lester Levin
149 Windsor Road
Yardley, PA
(212) 493-6633

Mr. Levin may testify concerning industrial hygiene in general and industrial hygiene practices with respect to asbestos exposure in specific industries. He may also testify concerning those areas described for witness Howard Ayer.

71. James E. Lockey, M.D.
Institute of Environmental Health
University of Cincinnati Medical Center
5251 Medical Science Building ML182
231 Bethesda Avenue
Cincinnati, Ohio 45267-0182
(513) 558-0030

Dr. Lockey may testify about the state of the scientific and medical knowledge concerning asbestos. Included in the testimony may be discussion of the respiratory system, asbestos related diseases and the effect of other substances on the respiratory system. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lamphear, among others.

72. John C. Lumsden
ELB Associates
Monitor, Inc.
605 Eastowne Drive
Chapel Hill, North Carolina 27514
(919) 967-2228

Mr. Lumsden may testify about the size, construction, layout, and working environment of facilities such as those where the plaintiffs worked. As an industrial hygienist, Mr. Lumsden may testify about the nature of the working environment in such locations. He may also testify about the ability or inability of certain asbestos products identified by the plaintiffs to release asbestos fibers and about tests of such products. He may also testify about other asbestos products identified by plaintiffs that are generally known to be in a working environment similar to plaintiffs. Mr. Lumsden may also testify regarding the chronology and meaning of governmental or other regulations regarding permissible levels of airborne asbestos fibers.

73. J. Corbett McDonald, M.D.
Chairman
Department of Epidemiology
Cardiothoracic Institute
London University
London, England

Dr. McDonald is an epidemiologist who may testify regarding the effects of various types of asbestos exposure. He may discuss the relationship between the amounts and type of asbestos exposure and the likelihood of development of disease, including but not limited to the concepts of dose response and threshold limit values.

74. Dr. Forde A. McIver (Deceased)
Pathology Associates, P.A.
135 Rutledge Avenue
Charleston, South Carolina 29401

Dr. McIver may testify by deposition on state of the art and the Saranac papers, and to the effect that the defendants could not have known end users were at risk until approximately the late 1960's.

75. Ronald S. McKee, CIH
McKee Environmental Health, Inc.
303 Westfield
Friendswood, TX
(281) 482-6436

Mr. McKee may testify to matters regarding industrial hygiene in general and industrial hygiene practices regarding asbestos exposure in specific industries and/or job functions. He may testify regarding the development and use of threshold limit values and the promulgation of state and federal regulations concerning the use of asbestos and exposure to asbestos in occupational settings. He may testify regarding medical and technical state of the art and scientific knowledge regarding asbestos, asbestos exposure and related industrial hygiene practices. He may testify regarding the state of knowledge of his field, including the development of scientific knowledge concerning the relationship between exposure to asbestos at various levels and disease, the development of standards and regulations applicable to asbestos, the development of industrial hygiene procedures and technology and the role and impact of various studies, standards, regulations, reports and commentaries. He may also testify regarding results of air sampling with respect to fiber release/friability of various asbestos-containing products, fiber drift, and the relative fiber release capability and relative exposure to respirable asbestos of certain types of asbestos fibers and asbestos-containing products.

76. Carl a. Mangold, CIH
3033 170th Place, S.E.
Bellevue, Washington 98008
(425) 747-9620

Mr. Mangold may testify about product composition; the manner in which products historically have been processed and used; and the chronology and meaning of governmental and other regulations regarding permissible levels of airborne asbestos fibers.

77. Joseph M. Miller, M.D.
RFD 2; Box 245A
Plymouth, New Hampshire 03264
(603) 536-3732

Dr. Miller may testify regarding the state of the art and the known end users were at risk until approximately the late 1960's.

78. William Miller, M.D.
The University of Texas Southwestern Medical Center
Aston Ambulatory Care Center/Internal Medicine Clinic, 6th Floor
5323 Harry Hines Blvd.
Dallas, TX 77030
(214) 648-3678

Dr. Miller is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

79. Stacey Mills, M.D.
Department of Surgical pathology
UVA Health Science Center
Old Medical School, Room 3900
Jefferson park Avenue
Charlottesville, VA 22902

Dr. Mills is a pathologist who may testify concerning all aspects of pathology as it relates to asbestos-related diseases, with emphasis on the diagnosis of asbestos related disease through the examination of pathology. He may also testify concerning his review of available pathology material of certain plaintiffs, and render opinion on whether they demonstrate evidence of an asbestos related disease, and if so, the nature and extent of same.

80. J. Steven Moore, M.D.
Medical College of Wisconsin
Department of Preventive Medicine
8701 Watertown Plank Road
Milwaukee, WI 53226
(414) 456-8296

Dr. Moore is an industrial hygienist and medical doctor who may testify about the standards, customs, and practices of industrial hygiene concerning the manner and method of conducting industrial hygiene surveys and reporting or publishing the results of those surveys. If witnesses for the plaintiffs are permitted to testify on the subject of medical ethics, Dr. Moore can be expected to testify in rebuttal to such testimony. He may testify regarding asbestos dust inhalation studies undertaken at the Saranac Laboratory. He may testify that an asbestos dust inhalation experiment sponsored by QAMA and undertaken by Saranac laboratory did not support the proposition that asbestos caused cancer. He may testify regarding the formation, purpose and composition of the Industrial Hygiene Foundation ("IHF") and certain studies concerning asbestos conducted by the IHF for other organizations. Dr. Moore may also testify as to the development and maintenance of threshold limit values for asbestos exposure.

81. Dr. Robert E. Moore
University of Missouri-Rolla
225 McNutt Hall
1870 Minor Circle Drive
Rolla, MO 65401
(573) 341-4111

Dr. Moore is an expert in mineralogy, metallurgy and ceramic engineering. He may offer testimony about the conversion of chrysotile asbestos to non-fibrous, benign materials known as forsterite and enstatite when exposed to temperatures typically found in an industrial setting requiring the use of refractory materials. He may also testify about refractory uses in foundries and steel mills. He may also testify concerning those areas described for witnesses Bradt and Kadunc. He may also testify to what trade organizations in the refractory industry and publications concerning asbestos hazards in refractories.

82. William K. C. Morgan, M.D.
University Hospital
University of Western Ontario
P.O. Box 5339, Postal Station A
London Ontario N6A 5 A5
(519) 663-3606

Dr. Morgan is a professor of medicine and director of chest diseases services at the University of Western Ontario. He has knowledge of the pathology, diagnosis, testing and causation of pulmonary and related disease, including mesothelioma, lung cancer and asbestos. He may testify about the state of the medical art as it relates to the knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. He may also testify about the plaintiffs' medical condition. Further, he may testify

about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

83. Gerald L. Myers, M.D.
Alta Bates Hospital
3001 Colby Plaza at Ashby, Room 237
Berkeley, CA 94705
(510) 204-4444

Dr. Myers is a board certified pulmonary physician and NIOSH certified "B" Reader. Dr. Myers may testify about the effects of pleural changes on lung function, the progression of asbestos-related lung disease, the risks of lung cancer in asbestos exposed individuals with and without asbestosis, and the risk of cancers other than lung cancer and mesothelioma among asbestos exposed individuals.

84. Alton Ochsner, M.D. (Deceased)
Jefferson Hospital
1507 Metairie Road
New Orleans, Louisiana
(504) 833-3783

Dr. Ochsner may testify by deposition about the medical condition of the plaintiffs and about asbestos-related diseases.

85. Robert O'Neal
Rt. 1, Box 168
Perkinston, Mississippi 39573
(601) 928-4972

Dr. O'Neal may testify regarding general and asbestos-related pulmonary pathology and the pathology of plaintiffs. He may testify about relevant medical literature and pulmonary pathology examination procedures.

86. Dr. David Paige
Professor Pathology
Vanderbilt University
Nashville, Tennessee 37203
(615) 322-3759

Dr. Paige may testify regarding general pathology and the pathology of the plaintiffs and/or plaintiffs' decedents.

87. John A. Pendergrass
Pendergrass Associates
Occupational Health & Safety Consultants
100 North Washington Street
Falls Church, Virginia 22046
(703) 536-3924

Mr. Pendergrass may testify regarding state of the art issues with respect to the asbestos industry and how that differs from the knowledge in the refractories industry. Further, he may testify as to the chemical, physical or toxicological properties of asbestos in relation to refractory materials.

88. Jack Peterson, C.E., C.I.H., Ph.D.
Peterson Associates
2830 Via Viejas Oeste
Alpine, CA 91901
(619) 445-9668

Dr. Peterson is an expert in industrial hygiene and engineering. He may testify regarding the proper use, effectiveness and limitations of industrial hygiene procedures and warnings, the physical characteristics of asbestos-containing products and the history and feasibility of substitute ingredients. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

89. A. Mitchell Polinsky, M.D.
Stanford University
Professor of Law and Economics
Crown Quadrangle
Stanford, California 94306-8610
(650) 723-0886

Dr. Polinsky may testify about the inappropriateness of punitive damages in this and similar cases based upon research he and others have conducted.

90. Sheldon Rabinovitz, Ph.D., CIH
Sandler Occupational Medicine Associates, Inc.
966 Hungerford Drive, Suite 20
Rockville, MD 20852
(301) 217-0092

Dr. Rabinovitz has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas relate to asbestos exposure and exposure to asbestos-containing products. His opinions and the grounds for the same include the following matters: (a) types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) types, composition and manufacture of asbestos-containing products; (c) history of such materials, use of asbestos in such materials, and lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in such materials during wear process; (e) compositions of residual materials after wear does not include significant asbestos; (f) effects of wear and the occupational environment of workers in which these products are used; (g) federal laws and regulations governing asbestos exposure; (h) threshold limit values and time-weighted averages; (I) epidemiology of asbestos-related diseases; (j) relevant medical and scientific literature on these subjects; (k) the concepts of toxicity and hazard, including discussion of the human body's natural defense system; and (l) dose/response relationships.

91. Dr. Lee B. Reichman
2 Brook Road
Tenafly, New Jersey 07670
(201) 541-4020

Dr. Reichman may provide testimony concerning the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the lack of relationship between the presence of pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical communities' awareness of the increased risks for an asbestos-related disease in the cases of prolonged exposure.

92. John Ritter, M.D.
Division of Surgical Pathology
Suite 300
Peters Building
Washington University Medical Center
One Barnes Hospital Plaza
St. Louis, MO 63110
(314) 362-0101

Dr. Ritter is a pathologist who may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of Plaintiff's medical records, history, x-rays and pathology material; his expert opinion to whether Plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition; to the effects of exposure to chrysotile fibers on the human body; and to all matters pertaining to the Plaintiff's medical condition.

93. Victor Roggli, M.D.
VA Medical School Lab Service
5089 Fulton Street
Durham, NC
(919) 286-0411

Dr. Roggli may testify regarding general pathology and the pathology of the plaintiffs and/or plaintiff's decedents. He may testify about asbestos and other substances' effect on human health generally and plaintiffs specifically.

94. Robert M. Ross, M.D.
17030 Nanes Drive, Suite 214
Houston, TX 77090
(281) 440-8851

Dr. Ross testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos

fibers; the difference between impairment and disability and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer. Further, he may testify about plaintiffs' medical condition.

95. Emanuel Rubin, M.D.
Jefferson Medical College
1020 Locust Street, Suite 279
Philadelphia, PA 19107-6799
(215) 955-5060

Dr. Rubin may testify about the accepted scientific standards and methods for conducting cancer research, including protocols and use of animals in cancer experimentation, and customs and practices regarding editing, peer review, and publication of manuscripts and scientific articles. He may also testify that an asbestos dust inhalation experiment sponsored by QAMA and undertaken by Saranac Laboratory did not support the proposition that asbestos caused cancer. He may also testify about medical knowledge regarding the health effects of asbestos.

96. John Sartin or his associate
Consulting Economist
Sartain & Company
3811 Turtle Creek Center, Suite 520
Dallas, Texas 75219
(214) 521-0760

Mr. Sartin is an economic consultant. He or his associate may testify regarding economic loss incurred by the plaintiffs.

97. Dr. Robert N. Sawyer
P.O. Box 1407
Guilford, CT 06437
(203) 453-3060

Dr. Sawyer may testify about the background levels of various fiber types found in the working population and the fiber types and exposure levels considered to be substantial in contributing to the causation of asbestos-related disease. He may also testify about applicable governmental standards. He may also testify about any matter raised by experts called by the plaintiffs or any co-defendants, including state of the art, causation and medical issues.

98. Dr. Irving J. Selikoff (Deceased)
Mr. Sinai School of Medicine
One Gustave Levy Plaza
New York, NY

Dr. Selikoff may testify by deposition regarding the relationship between asbestos and disease, knowledge concerning same in state of the art, and all topics reflected in defendants' deposition designations.

99. James Robert Shepherd, III, M.D.
University of Texas Health System at Tyler
Department of Radiology
P.O. Box 2003
Tyler, TX 75710
(903) 877-7100

Dr. Shepherd is a radiologist who may testify concerning the application of radiological techniques to diseases of the lung and the lining of the lung. He will discuss the proper radiographic techniques for the diagnosis of asbestos-related diseases and conditions, and the effects asbestos exposure can have on lungs as demonstrated through the use of radiographs. Dr. Shepherd may be asked to review radiographic material relevant to these cases and to render opinions on the same, with emphasis on the presence or absence of asbestos related disease.

100. Russell P. Sherwin, M.D.
2011 Zonal Ave. HMR -201
Los Angeles, California 90033-1051
(213) 342-1165

Dr. Sherwin may testify regarding general pathology and the pathology of the plaintiffs and/or plaintiffs' decedents. Further, he may testify about what and when doctors, mine owners, and manufacturers knew or should have known about the dangers of exposure to asbestos, not only to people working in mines and manufacturing plants, but also to those coming into contact with the product such as insulators, pipefitters, and others working in close proximity to the installation or removal of asbestos-containing materials.

101. Bruce M. Shields
2040 Glen Abbey Ct., Nevillewood
Presto, PA 15142
(412) 276-273

Mr. Shields is a metallurgical engineer with U.S. Steel and may testify about all aspects and phases of the steel-making operations.

102. Dr. Allan Shulkin
Medical City Dallas Hospital
7777 Forest Lane, Suite 202
Dallas, TX 75230
(972) 934-1593

Dr. Shulkin is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and x-rays and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

103. Dorsett Smith, M.D.
4301 Colby, Suite 201
Everett, Washington 98203
(206) 259-5171

Dr. Smith may provide testimony concerning the anatomy and function of the respiratory and circulatory system; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the lack of a relationship between the presence of pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical communities awareness of the increased risks for an asbestos-related disease in the cases of prolonged exposure.

104. James Garland Smith, Jr., M.D.
1666 East Burt Kouns # 140
Shreveport, LA 71105
(318) 797-8777

Dr. Smith is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and x-rays and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

105. Dr. Lewis Solmon
Associate Dean
Graduate School of Education
U.C.L.A.
308 Moore Hall
Los Angeles, California 90024
(310) 825-2624

Dr. Solmon may testify about the historical sales and market shares of asbestos insulation manufacturers.

106. Dr. Jesse Steinfield

Dr. Steinfield may testify concerning government warnings, union knowledge, smoking, and some areas of state of the art.

107. Roy Steinfurth
Room 505, Machinist Building
1300 Connecticut Avenue, N.W.
Washington, D.C.

As the administrator of the Asbestos Worker's International health hazards program, Mr. Steinfurth may provide testimony that the insulators' unions were, or should have been,

aware of hazards associated with inhalation of asbestos fibers, and that this information was distributed to the union members through various means, including the "green sheets." Further, he may testify about the authentication of asbestos workers publications, safety information, meetings and union activities.

108. Dr. Paul Stevens
Baylor College of Medicine
6516 Bertner
Houston, Texas 77030
(713) 790-6492

Dr. Stevens is a specialist in the area of respiratory diseases. He may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

109. Gail D. Stockman, M.D.
701 E. Marshall, Suite 502
Longview, TX 75601
(903) 753-0787

Dr. Stockman is a pulmonologist and may testify about the medical condition of the plaintiffs based on her examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. She may also testify about general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and on plaintiffs specifically. She may testify about the state of scientific and medical art of asbestos related diseases and epidemiology and general medicine regarding asbestos exposure. She may also testify about those areas described for witnesses Demopolous, Hinshaw, Weill, Craighead, Gaensler, and Kerby. Further, she may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos-related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. She may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lamphsear, among others.

110. Robert Taylor, M.D.
1455 East Burt Kouns
Shreveport, LA 71105
(318) 798-4696

Dr. Taylor is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and x-rays and about asbestos-related diseases. He may testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lungs; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

111. Claude Tellis, M.D.
Ochsner Clinic of Baton Rouge
9001 Summa Avenue
Baton Rouge, LA 70809
(504) 761-5271

Dr. Tellis is a pulmonary specialist who may testify concerning all aspects of asbestos-related disease, epidemiology, and fear of cancer. Dr. Tellis may review records for particular plaintiffs in these cases and render opinions on the health and diseases of such plaintiffs.

112. Bill Trantum, M.D.
9501 Lyle Drive
Little Rock, Arkansas
(501) 223-8003

Dr. Trantum may testify about the medical condition of the plaintiffs and about asbestos-related diseases

113. J.C. Wagner, M.D.
Cardiff
Wales, United Kingdom

Dr. Wagner may testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology, and epidemiology relevant thereto. This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a bases for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others

114. Hans Weill, M.D.
Tulane University
School of Medicine
1700 Perdido Street, 2nd Floor
New Orleans, Louisiana 70112
(504) 588-5265

Dr. Weill is a pulmonary disease specialist. He may testify about the medical condition of the plaintiffs, and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer. Likewise, he may testify about scientific knowledge, research and study regarding exposure to asbestos and its effects on the human body; the latency periods of asbestos related diseases; the various types of asbestos fibers and their effects on the human body; and the effects of exposure of the chrysotile fiber in regard to asbestos related diseases.

115. Francis W. Weir, Ph.D.
8131 Wycomb Drive
Houston, TX
(713) 893-4003

Dr. Weir may testify to matters regarding industrial hygiene in general and industrial hygiene practices regarding asbestos exposure in specific industries and/or job functions. He may testify regarding the development and use of threshold limit values and the promulgation of state and federal regulations concerning the use of asbestos and exposure to asbestos in occupational settings. He may testify regarding medical and technical state

of the art and scientific knowledge regarding asbestos, asbestos exposure and related industrial hygiene practices. He may testify regarding the state of knowledge of his field, including the development of scientific knowledge concerning the relationship between exposure to asbestos at various levels and disease, the development of standards and regulations applicable to asbestos, the development of industrial hygiene procedures and technology and the role and impact of various studies, standards, regulations, reports, and commentaries. He may also testify regarding results of air sampling with respect to fiber release/friability of various asbestos-containing products, fiber drift, and the relative fiber release capability and relative exposure to respirable asbestos of certain types of asbestos fibers and asbestos-containing products.

116. Dr. Elizabeth Weisburger
5309 McKinley Street
Bethesda, MD 20814
(301) 530-4042

Dr. Weisburger may testify about the accepted scientific standards and methods for conducting cancer research, including protocols and use of animals in cancer experimentation, and customs and practices regarding editing, peer review, and publication of manuscripts and scientific articles. She may testify that an asbestos dust inhalation experiment sponsored by QAMA and undertaken by Saranac Laboratory did not support the proposition that asbestos caused cancer. She may testify about medical knowledge regarding the health effects of asbestos.

117. Dr. William Weiss
Hahnemann College
Philadelphia General Hospital
Philadelphia, PA
(215) 762-7724

Dr. Weiss is a respiratory disease specialist and may testify about the medical condition of the plaintiffs based on his examination of the plaintiffs and/or review of the plaintiffs' medical records and about asbestos-related diseases. He may also testify about those areas described for witnesses Demopolous, Hinshaw, Weill, Craighead, Gaensler, and Gee. Further, he may testify about the probable time period(s) of asbestos exposure with regard to the causation of mesothelioma and other asbestos related diseases and may provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. He may rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

118. Dr. Robert A. Wessels
710 FM 1960 West, Suite C
Houston, Texas 77090

Dr. Wessels is a pathologist who may testify concerning all aspects of pathology as it relates to asbestos related diseases. He may also testify concerning his review of available pathology material of certain plaintiffs, and render opinions on whether it demonstrates evidence of an asbestos related disease, and if so, the nature and extent of same.

119. Dr. Paul S. Wheeler
Johns Hopkins Medicine
600 North Wolfe Street
Baltimore, MD 21287
(410) 955-5423

Dr. Wheeler may testify regarding the pathology of lung disease, and the fiber burden imposed upon lung tissue based on varying intensities, and duration of exposure to dusts, including asbestos dust and the toxicity of various asbestos fibers. He may give testimony and opinions regarding the medical condition of certain plaintiffs and whether the plaintiff's medical condition was proximately caused by exposure to asbestos-containing products. He may also testify regarding any asbestos-related disease in certain plaintiffs, including but not limited to pleural changes, asbestosis and lung cancer. He may review and provide testimony on pathology on any given plaintiff.

120. Dr. Thomas Wheeler
The Methodist Hospital
Department of Pathology
6565 Fannin St., MS-205
Houston, TX 77030
(713) 790-2681

Dr. Wheeler is a pathologist who may testify about asbestos-related diseases generally and the effect of asbestos, cigarette smoke and other substances on human health generally and on the plaintiffs specifically. He may also testify about the areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler, and Kerby.

121. Dr. Mark R. Wick
941 Villa Gran Way
Fenton, MO 63023
(314) 349-0953

Dr. Wick may testify about his review of the plaintiffs' work history, medical records, including tissue and pathology, medical condition and about asbestos-related diseases. He may testify as a general medical witness and may give testimony regarding the diagnosis or lack of a diagnosis of an asbestos-related disease and the etiology of such disease. He may also testify regarding the absence of any increased risk of cancer suffered by the plaintiffs as

a result of exposure to asbestos product. He may also testify regarding the pathology and pathogenesis of malignant mesothelioma and other asbestos related diseases as they may relate to exposure to various types of asbestos fibers. Moreover, he may testify about matters raised by experts called by plaintiffs and co-defendants.

122. R. Keith Wilson, M.D.
6550 Fannin St., Suite 2403
Houston, Texas 77030
(713) 790-6250

Dr. Wilson is a specialist in the area of respiratory diseases. He may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; the difference between impairment and disability; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer.

123. Dr. Philip Witorsch
George Washington University Medical Center
2100 Pennsylvania Avenue, N.W., Suite 685
Washington, D.C. 20037
(202) 364-1213

Dr. Witorsch may testify on matters relating to occupational medicine and pulmonary medicine. Dr. Witorsch may testify about the standards, customs, and practices concerning the manner and method of conducting scientific studies and reporting or publishing the results of those studies. He may testify that an asbestos dust inhalation experiments sponsored by QAMA and undertaken by Saranac Laboratory did not support the proposition that asbestos caused cancer. If witnesses for the plaintiffs are permitted to testify on the subject of medical ethics, Dr. Witorsch can be expected to testify in rebuttal to such testimony.

124. Dr. David Weill
7777 Forest Lane
Dallas, Texas 75230
(972) 566-4866

Dr. Weill is a pulmonary disease specialist. He may testify about the medical condition of the plaintiffs and about asbestos-related diseases. He may also testify generally about the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos and the development of respiratory ailments; methods of diagnosis of various respiratory diseases; incidence of lung cancer among individuals with asbestosis; cigarette smoking and its effect on the lung; the effect of asbestosis on disability and life expectancy; the toxicity of various asbestos fibers; and the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer. Likewise, he may testify about scientific knowledge, research and study regarding exposure to asbestos and its effects on the human body; the latency periods of asbestos related diseases; the various types of asbestos fibers and their effects on the human body; and the effects of exposure of the chrysotile fiber in regard to asbestos related diseases.

125. John W. Spencer, CIH, CSP, RS
8815 Centre Park Drive, Suite 311
Columbia, Maryland 21045
Phone: 410-964-9900

Mr. Spencer is an industrial hygienist and toxicologist. His field of expertise is occupational safety and health. He may testify regarding the development and use of threshold limit values and the promulgation of state and federal regulations concerning the use of asbestos and exposure to asbestos in occupational settings. He may testify regarding medical and technical state of the art and scientific knowledge regarding asbestos, asbestos exposure and related industrial hygiene practices. He may testify about the nature of the working environment in facilities such as those where plaintiffs worked. He may also testify about ability or inability of certain asbestos products identified by the plaintiffs to release asbestos fibers and about tests of such products. He may also testify about other asbestos products identified by plaintiffs that are generally known to be in a working environment similar to plaintiffs. He may also testify regarding the chronology and meaning of governmental or other regulations regarding permissible levels of airborne asbestos fibers. He will testify about tests he conducted on Ingersoll-Rand equipment, the results of those tests and about any and all opinions and the basis of such opinions regarding the results of those tests. See attached report. See attached resume. He will testify as to the Ingersoll-Rand equipment and asbestos exposure.

126. Mr. John Clary
Ingersoll-Rand Company
200 Chestnut Ridge Road
Woodcliff Lake, New Jersey 07675

127. Donald Holston
Ingersoll-Rand Company
200 Chestnut Ridge Road
Woodcliff Lake, New Jersey 07675

Donald Holston will provide testimony in regard to the issues concerning portable compressors manufactured by Ingersoll-Rand.

128. Dan Hancock
Ingersoll-Rand Company
Davidson, NC

Dan Hancock will provide testimony in regard to the issues concerning rotary screw compressors manufactured by Ingersoll-Rand.

129. Paul Manning
Ingersoll-Rand Company
Davidson, NC

Paul Manning will provide testimony in regard to the issues concerning reciprocating compressors manufactured by Ingersoll-Rand.

130. Ronald Haugen
Ingersoll-Rand Company
Mayfield, KY

Ronald Haugen will provide testimony in regard to the issues concerning centrifugal compressors manufactured by Ingersoll-Rand.

131. Ken Nealy
Ingersoll-Rand Company
Campbellsville, KY

Ken Nealy will provide testimony in regard to the issues concerning small reciprocating compressors manufactured by Ingersoll-Rand.

132. Dr. Juan Huerra, Ph.D.
The University of Texas at El Paso
Mechanical and Industrial Engineering
500 West University Avenue
El Paso, Texas 79968
133. All physicians who have seen, examined or treated plaintiffs or plaintiffs' decedents to testify regarding matters contained in their medical records and reports.
134. Defendant reserves the right to cross-examine any witness designated by any other party herein.
135. Custodians of all applicable medical and employment records.
136. In addition, INGERSOLL-RAND COMPANY may supplement this answer by supplementing its discovery responses in individual lawsuits and reserves the right to call such additional witnesses who may have knowledge pertinent to a particular case.
137. All plaintiffs mentioned in the subject case. Names and addresses provided by plaintiffs counsel.
138. In addition, INGERSOLL-RAND COMPANY may supplement this answer by supplementing its discovery response in individual lawsuits and reserves the right to call such additional witness's who may have knowledge pertinent to a particular care.
139. The physicians and medical doctors designated by plaintiffs and listed in plaintiffs' answers to interrogatories. These may provide expert/fact witness testimony regarding plaintiffs' medical condition(s). These opinions are set forth in plaintiff's medical records.
140. In addition to offering factual testimony, the fact and co-workers designated by plaintiffs and listed in plaintiff's answers to interrogatories may offer specialized or expert testimony concerning the use of asbestos-containing products, the locations where such products were used, the manner of installation of asbestos-containing products, the working conditions created by the use of asbestos-containing products, the nature of equipment to which asbestos-containing products are applied and packaging or specifications for the use of asbestos containing materials. These witness will also testify as to the working condition and any other work-related topics relevant to the cause of actions. These witnesses may also testify as to their knowledge of the plaintiff's usage, if any, or the asbestos-containing products and locations where used. These witnesses may also provide testimony relating to the plaintiff's exposure to asbestos-containing materials.

141. All witness listed by all Defendants. All witnesses listed in Plaintiff's Answers to interrogatories. All witnesses listed in Plaintiff's Standard List of Deposition Testimony. All witnesses listed by Plaintiff in depositions. Any physician who has examined and/or treated Plaintiff. Any and all records custodians, live or by deposition upon written questions, for any physicians or institutions listed herein or revealed in plaintiffs, answers to interrogatories or any other pleading on file in this case.
142. All witnesses designated in INGERSOLL-RAND COMPANY's In RE: Dallas County Designation of Expert and Fact Witnesses.
143. Mr. Don Voll
Ingersoll-Rand Company
Phillipsburg, New Jersey

Don Voll will provide testimony in regards to the issues concerning pumps manufactured by Ingersoll-Rand.

144. Webb Umberger
6690 Branch Road
Smithdale, Mississippi 39664

Webb Umberger will provide testimony regarding issues concerning pumps and compressors manufactured by Ingersoll-Rand.

This defendant reserves the right to name additional expert witnesses.

INGERSOLL-RAND COMPANY hereby adopts and incorporates by reference the page and line deposition designations for the above designated experts and others to the extent such designations have been made by other parties to this litigation. INGERSOLL-RAND COMPANY also reserves the right to offer and read into evidence prior deposition or trial testimony of any witness designated and put on by plaintiffs or co-defendants, whether called live or by prior testimony. Also, see the page and line designations filed by INGERSOLL-RAND COMPANY In Re.

Reports have been provided by some of the potential experts. To the extent these reports have not been provided to plaintiffs by other defendants or INGERSOLL-RAND COMPANY, the reports will be made available for inspection and copying upon reasonable notice.

Further, any documents INGERSOLL-RAND COMPANY provided to these potential experts specifically in connection with this litigation will be made available for inspection and copying. Those potential experts who have been employed by INGERSOLL-RAND COMPANY have reviewed various documents in connection with that employment, but have not individually kept records of all documents reviewed.

Plaintiffs' counsel are in possession of the detailed information about the education, work history, and writings of the potential experts named. Further, they are in possession of transcripts within which these expert's opinions have been explored. INGERSOLL-RAND COMPANY will also provide resumes or curriculum vitae for those experts who are directly associated with INGERSOLL-RAND COMPANY for inspection or copying upon reasonable notice.