

FEB.23.96* 23480



IN RE: ALL ASBESTOS-RELATED * IN THE DISTRICT COURTS
PERSONAL INJURY OR *
DEATH CASES FILED OR * OF DALLAS COUNTY, TEXAS
TO BE FILED IN DALLAS *
COUNTY, TEXAS * 160TH JUDICIAL DISTRICT

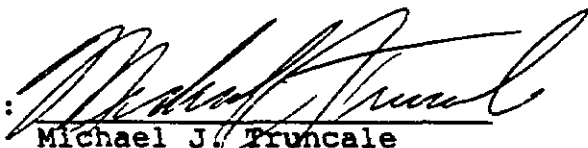
KELLY-MOORE PAINT CO., INC.'S
SUPPLEMENTAL ANSWERS TO MASTER DISCOVERY

Comes Now, Kelly-Moore Paint Co., Inc., and pursuant to Rule 168, Texas Rules of Civil Procedure, submits and files its supplemental answers to Master Interrogatories and Request for Production propounded by plaintiffs herein, and would show unto the court the following:

Respectfully submitted,

ORGAIN, BELL & TUCKER, L.L.P.
470 Orleans Street
Beaumont, Texas 77701
409-838-6412
FAX: 409-838-6959

BY:


Michael J. Truncale
State Bar No. 20258125

ATTORNEYS FOR DEFENDANT,
KELLY-MOORE PAINT CO., INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing has been served upon all interested counsel of record on this the 21st day of February, 1996.


MICHAEL J. TRUNCALÉ

SUPPLEMENTAL ANSWERS ARE AS FOLLOWS:

60. Please state the following with respect to each expert witness that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- (a) The name, address and job classification of each such expert witness.
- (b) The subject matter on which the expert is expected to testify.
- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

ANSWER:

Kelly Moore Paint Company cannot state which expert, if any, will testify in each case filed in the county. This list of experts is made pursuant to court order.

Dr. Jerrold Abraham, Department of Pathology, State University of New York, 750 East Adams Street, Syracuse, New York 13210 (315) 464-4750.

Dr. Elvin Adams, Rt. 4, Box 614-B, Burleson, Texas 76028, 11803 South Freeway, Suite 201, Fort Worth, Texas 76115. Dr. Adams is a medical doctor and a board certified specialist in internal medicine. His testimony may discuss the structure and function of the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

Dr. Charles R. Adcock, 1100 Holly Avenue, South Pittsburg, Tennessee 37380 and/or his custodian of records.

Thomas E. Addison, M.D., Pulmonologist, Internist; Mount Zion Hospital, 1600 Divisadero Street, San Francisco, California, (415) 567-7255. Dr. Addison may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis and issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Thomas Adkins, 38252 River Drive, Lebanon, Oregon 97355 (503) 285-2147.

Dr. Roy Agner, 611 Mocksville Avenue, Salisbury, North Carolina 28144 and/or his custodian of records.

Edward Allebach, 109 Emerald Avenue, Westmont, New Jersey 08108-2401 (609) 854-9120.

Dr. Dean Allen, Huntsville, Alabama and/or his custodian of records.

Alvin C. York Veteran's Affairs Medical Center, Custodian of Records, 3400 Lebanon Road, Murfreesboro, Tennessee 37129.

Dr. Masoud Alzeerah, 1901 Medi Park, Amarillo, Texas 79106 (806) 355-9248.

Ronald Amede, M.D., 1430 Tulane Avenue, New Orleans, La. 70112 (504) 588-5451.

Mr. Arnold E. Anderson, Tribo Diagnostic Corp., P. O. Box 2008, Livonia, Michigan 48151 (313) 417-6507. Mr. Anderson has expertise in the composition, manufacture, use and wear characteristics of friction materials. He may be asked to testify concerning the following matters: (a) the science of tribology; (b) the types, characteristics and chemical properties of asbestos used in friction materials and their pathogenic potential; (c) the types, composition and manufacture of friction materials; (d) the history of friction materials, the use of asbestos in friction materials and the availability of substitutes for asbestos; (e) decomposition of asbestos in friction materials during the wear process; (f) the nature of residual materials after wear; and (g) the effects of wear debris in the occupational environment of workers where friction materials are used.

If called, he is expected to testify concerning certain other aspects of and basis for these general areas of opinions relating to this cause or other matters of fact regarding friction materials which because technical nature may contain some opinions.

Gregory Anderson, M.D., Pulmonologist, Internist; Respiratory Medical Group, 130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California, 94598, (510) 944-0166. Dr. Anderson may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos.

Alred Angrist, deceased (by deposition).

Dr. W. A. Anthony, Deceased, Custodian of Records, Gastonia, North Carolina.

Dr. Larry Arcement, North Baldwin Hospital, Box 35021, Bay Minette, Alabama 36507 and/or his custodian of records.

Dr. Alan H. Arrington, 250 Chateau Drive, ste. 225, Huntsville, Alabama 35801 and/or his custodian of records.

Dr. William M. Asher, 9516 Neumann Drive, Elberta, Alabama 36530 (334) 986-7650.

Atlanta Gastroenterology, Custodian of Records, Atlanta, Georgia.

Atlanta-South Gastroenterology, Custodian of Records, East Point, Georgia.

Dr. Oscar Auerbach, 158 Longhill Drive, Short Hills, New Jersey 07078. Dr. Auerbach is a pathologist. He may testify to all matters pertaining to scientific study and research concerning exposure to asbestos in regard to 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 regarding whether plaintiff suffers from a respiratory disease and cause of such disease, including but not limited to asbestosis; and all other matters concerning plaintiff's medical condition.

Professor Howard Ayre, 2812 Linwood Avenue, Cincinnati, Ohio 45209. Professor Ayre may testify as to the history of TLV; State of the Arts as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants; the potential of exposure in excess of the TLV as it concerns certain asbestos containing products; and the dust levels created by this defendant's products.

Dr. Stephen Ayres, Sanger Hall Room 1-014, Box 565, MCV Station, Richmond, Virginia 23298. Dr. Ayres is a pulmonary specialist. Dr. Ayres may testify as to all matters pertaining to the history of scientific knowledge, research and study concerning exposure to asbestos and its effects on the human body; as to all state of the art research issues; as to his expert opinion as to safe levels of asbestos exposure and the basis for such opinions; as to the exposure to asbestos in regards to development of respiratory disease, including but not limited to asbestosis, lung cancer, and mesothelioma; as to the effects of exposure to the chrysotile fiber and other asbestos fibers.

Edward J. Baier, 9754 Hatmark Court, Vienna, Virginia 22181; (703) 281-9501. Mr. Baier is an industrial hygienist who may testify concerning state of the art as it relates to asbestos.

Dr. Bob Baird, 3600 Gaston #806, Wadley Tower, Dallas, Texas 75246. Dr. Baird may testify about the examination and diagnosis of the physical condition of a particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos, and may testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, and Gaensler.

Dr. James Ballard, Princeton Diagnostic, 817 Princeton Avenue, Birmingham, Alabama (205) 783-3700.

Dr. J. Alan Barksdale, Shoals Medical Lab, 501 North Montgomery Avenue, Valley Federal Building, Sheffield, Alabama 35660, (205) 383-1160.

Dr. John E. Barsa, 4178 N. Armenia, Tampa, Florida 33607 and/or his custodian of records.

Fred Bass, Bass Consultants, Inc., 530 Wells Fargo, Suite 101, Houston, Texas 77090. Mr. Bass may testify about the economic aspects of the case.

Dr. Joseph Bates, 4300 West 7th Street, Little Rock, Arkansas 72205. Dr. Bates will testify concerning his examination and diagnosis of the physical condition of a particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos, and may testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, and Gaensler.

Hector A. Battifora, M.D., Pathologist; City of Hope Medical Center, Division of Pathology, 1500 East Duarte Rd., Duarte, California 91010 (818) 359-8111. Dr. Battifora may testify regarding pathological aspects of the case, plaintiff's condition and issues of alternative causation.

David Bayliss, RD 689, Room 3812-C, United States EPA, 401 "M" Street, SW, Washington, D.C. 20460. Government testing of worksite and environmental chemicals and substances.

Dr. Jeff H. Beard, 3715 Dauphin Street, Mobile, Alabama 36608 and/or his custodian of records.

Beckley Hospital, Custodian of Records, 306 Stanford Road, Beckley, West Virginia 25801.

Stephen Berger, 10564 Eastborne Ave., Los Angeles, California 90024.

Colleen J. Bergin, M.D., M.B., Ch.B., UCSD Medical Center, Department of Radiology (8756), 225 Dickinson Street, San Diego, CA 91203-8756, (619) 543-2280. Dr. Bergin may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Bernard, retired, Pleasant Grove, Alabama and/or his custodian of records.

Bessemer Carraway Medical Center, Custodian of Records, Box 847, Bessemer, Alabama 35021.

Scott R. Bickford, Martzell & Bickford, 338 Lafayette Street, New Orleans, La. 70130 (504) 581-9065.

Dr. A. K. Black, 701 Lloyd Nolan Parkway, Fairfield, Alabama 35064 and/or his custodian of records.

George Blackwood, Winchester, MA.

Dr. Gregory P. Blair, 9155 S.W. Barnes, Ste. 830, Portland, Oregon 97225, (503) 297-3778.

Dr. Harry Blair, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Dr. Gail Blakley, 215 Milby Street, Houston, Texas 77003 (713) 225-0463.

Bernard Blaney, 925 Allamanda Dr., Delray, Florida 33483, 407-265-0328. Mr. Blaney is a former Treasurer of Rapid and is expected to testify regarding the corporate history of Rapid, facts supporting Rapid's Special Appearance to Present Motion Objecting to Personal Jurisdiction, facts supporting Rapid's denial of liability as an alleged successor to Philip Carey Manufacturing Company, Rapid's corporate history, facts supporting Rapid's denial of liability for punitive damages, the business operations of Rapid, the fact that Rapid never manufactured asbestos-containing products, the impact of asbestos-related litigation on Rapid, any defenses asserted by Rapid, Rapid's lack of relationship with the Celotex Corporation, and other facts relating to Rapid.

Dr. Alton Blow, 1300 North 4th Street, Longview, Tx. 75601 (903) 757-2122.

Dr. Floyd T. Boudreau, P. O. Box 2144, Mobile, Alabama 36601 (334) 431-3343.

Kenneth J. Boudreaux, Ph.D., Consulting Economist, A.B. Freeman School of Business, Tulane University, 1424 Boudreaux, New Orleans, Louisiana 70116. Dr. Boudreaux is an economic consultant and may testify regarding plaintiff's economic loss, past, current, and future, if any.

Dr. Thomas Boylen, 1200 N. State Street, Los Angeles, California 90033. General and asbestos-related pulmonary medicine examination procedure.

Dr. Brian Bradley, The Lung Center, 4003 Woodlawn, Pasadena, Texas 77504. Dr. Bradley is a medical doctor. He may testify about the medical condition of the plaintiff and about asbestos-related diseases.

Brandon Hospital, Custodian of Records, Brandon, Florida.

Barbara Branson, M.D., Rheumatologist; 120 La Casa Via, Suite 211, Walnut Creek, Ca 94598 (510) 256-9887. Dr. Branson may testify regarding plaintiff's medical condition(s), medical history, prognosis and issues of alternative causation including but not limited to those conditions specifically within the area of expertise of a rheumatologist and life shortening problems not related to alleged asbestos exposure.

William S. Breall, M.D., Cardiologist, Internist: 1150 Bush Street, Suite 4A, San Francisco, California 94109, (415) 775-2277. Dr. Breall may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Arnold R. Brody, Ph.D., Tulane University Medical Center, School of Medicine, Department of Pathology & Laboratory Medicine SL79, 1430 Tulane Avenue, New Orleans, La. 70112-2699 (504) 588-5224.

Dr. Barry L. Brown, 3701 Dauphin Street, Mobile, Alabama 36608 and/or his custodian of records.

Dr. Kevin Browne, 66a Warwick Way, London, England SW1V 1RZ. Cancer issues, e.g., cancer risk, relationship between asbestosis and lung cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. General and asbestos-related pulmonary medicine issues and epidemiology relevant thereto.

Dr. James Bruce, Lufkin Pathology Laboratory, 700 Gaslight Boulevard, Lufkin, Texas 75901 (409) 632-5992.

Mr. Sidney J. Burgeson, W. W. Henry Co., 5608 Soto St., Huntington Park, California 90255. Mr. Burgeson was employed by The Synkoloid Company for a period of time and is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

Louis Burgher, M.D., Ph.D., 145 North Tower Doctors Building, 4242 Farnam Street, Omaha, Nebraska 68131 (402)559-2900. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure. 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.

Dr. Anthony L. Burke, 709 Barker Street, Salisbury, North Carolina 28145 and/or his custodian of records.

Dohrman H. Byers. Mr. Byers was the Chief of Analytical Chemistry Service, United States Department of Public Health from 1949 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 which he occupied that position.

Dr. Samuel H. Cade, Radiology Department, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75242. Dr. Cade is a B Reader and will testify regarding the radiographs of the plaintiff and/or plaintiff's decedent.

Dr. Edwin Cadman, M.D., University School of Medicine, 333 Cedar Street, New Haven, CT. 06510. Dr. Cadman is a licensed physician and Professor of Medicine who specializes in oncology. He is expected to testify as to the history and development of medical knowledge concerning asbestos-related disease. He may also testify regarding the relationship, if any, between asbestos and plaintiff's medical condition.

George E. Caesar, Jr., 2940 Camino Diablo #300, Walnut Creek, Ca. 94596. Mr. Caesar is certified in the comprehensive practice of industrial hygiene and may be called to testify regarding his knowledge of the types of products manufactured and/or distributed by Kelly-Moore, their use and potential exposure to airborne asbestos fibers experienced by plaintiffs who either worked directly with the products or claim vicinity exposure. Mr. Caesar may also testify as to plaintiff's total exposure to asbestos and what role plaintiff's exposure to asbestos-containing products manufactured and/or distributed by Kelly-Moore, if any, played in the context of plaintiff's total exposure. Mr. Caesar may also testify as to the industrial hygiene state of the art regarding asbestos-related disease and industry knowledge of any hazards which may have been associated with use of products such as those manufactured by Kelly-Moore which contained asbestos.

Dr. Phillip Cagle, Baylor College of Medicine, One Baylor Plaza, 6565 Fannin, MS 205, Houston, Texas 77030. Dr. Cagle is a pathologist. He 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.

Dr. Joseph Calhoun, #1 St. Vincent Circle, Suite 160, Little Rock, Arkansas (501) 666-9400.

John T. Cantlon. Mr. Cantlon will testify by deposition concerning Philip Carey in general and the authenticity and admissibility of certain documents relating to Philip Carey.

Paul E. Caplan, 1484 Sigma Circle, Cincinnati, OH 45255.

Dr. Capps and Dr. Scherer, V.A. Medical Center, Biloxi Division, 400 Veterans Blvd., Biloxi, Mississippi 39531 and/or their custodian of records.

Cararrus Memorial, Custodian of Records, 920 Church Street N., Concord, North Carolina 28025.

Dr. Carmichael, Fairfield, Alabama, and/or his custodian of records.

Carolina Medical Center, Custodian of Records, 1000 Blythe Boulevard, P. O. Box 32861, Charlotte, North Carolina 28232.

Dr. Carp, Birmingham, Alabama and/or his custodian of records.

Carraway Methodist Hospital, Custodian of Records, Bessemer, Alabama.

Carolina Surgical Clinic, Custodian of Records, Charlotte, North Carolina.

Dr. Greg Casar, Respiratory Consultants of Houston, Smith Tower, 6550 Fannin, Suite 2403, Houston, Texas 77030. Dr. Casar is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of plaintiff(s) and plaintiff(s)' medical records; any communications with plaintiff(s) or plaintiff(s)' family; review of x-rays of plaintiff(s); the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff(s) suffer(s) from asbestos-related disease and the basis for such opinion; the plaintiff(s)' current medical condition and his prognosis in regard to plaintiff(s)' medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure

such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and to the effects of exposure to chrysotile fibers on the human body.

Dr. Joseph Cimino, New York Medical College, 50 Willard Avenue, North Tarryton, NY 10591. Dr. Cimino is presently Professor and Chairman of the Department of Community and Preventative Medicines New York Medical College, Valhalla, New York. Dr. Cimino may be expected to testify generally about research in the area of pulmonary pathology and about the process by which medical knowledge evolved. He may also be expected to testify regarding the state of medical knowledge from the early part of the century to the middle 1960s as it regards pathological changes due to exposure to asbestos and about his conclusions regarding his studies conducted by the Saranac Laboratories as they related to the state of the medical knowledge at that time. This defendant believes that Dr. Cimino is of the opinion during most of this century 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. 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.

Dr. Mark Clark, Pulmonary and Critical Care Consultants, 1305 West 34th Street, Suite 400, Austin, Texas 78705-1169 (512) 459-6599.

Dr. Clarres, Austell, Georgia 30001 and/or his custodian of records.

Dr. Wayner Cline, 909 W. Henderson Street, Salisbury, North Carolina 28144 and/or his custodian of records.

Cobb Hospital and Medical Center, Custodian of Records, 3950 Austell Road, Austell, Georgia 30001.

Dr. C. Glenn Cobbs, Veterans Affairs Medical Center, 700 South 19th Street, Birmingham, Alabama, (205) 933-8101.

Edward Mitchell Cohen, M.D., Cardiologist, Internist, 2299 Post Street, Suite 207, San Francisco, California 94115 (415) 567-9469. Dr. Cohen may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Michael Cohen, M.D., Pulmonologist, Internist; Respiratory Medical Group, 130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California 94598, (510) 944-0166. Dr. Cohen may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Richard Cohen, 19242 Panorama Dr., Saratoga, California 415-424-5156.

Thomas V. Colby, M.D., Surgical Pathologist; St. Mary's Hospital, Mayo Clinic, 1216 Second Street Sw, Rochester, Minnesota 55902, (507) 284-2511. Dr. Colby may testify regarding the pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. William S. Cole, 821 Sunnbrook, Melbourne, Florida 32935. Dr. Cole is a B-reader and will testify regarding the radiographs of the plaintiff(s) and/or plaintiff(s)' decedent.

Patrick Colletti, M.D., Nuclear Medicine Specialist; LAC/USC Medical Center, General Hospital, 1200 N. State Street, Los Angeles, California 90033, (213) 226-7852. Dr. Colletti may testify regarding the diagnostic capabilities and limitations of gallium scan studies in the context of benign asbestos related disease.

James Collins, M.D., Radiologist; U.C.L.A. Medical Center Radiology, 10833 Le Conte Avenue, West Los Angeles, California 90024, (213) 825-7180. Dr. Collins may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. James L. Comadoll, 400 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

John P. Conroy, Artra Group, P. O. Box 8903, Northfield, Illinois 60093. Mr. Conroy is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

Maceo Cook, 1070 Legion Club Road, Salisbury, North Carolina 28144 (704) 279-3089.

Warren Cook, 6376 Plankton Drive, Columbus, Ohio (614) 864-5277. Mr. Cook is an industrial hygienist who may testify concerning state of the art regarding asbestos.

Kirby B. Cooper, Ph.D., 3399 Sweet Drive, Lafayette, CA 94549; Phone: (510) 646-5564, Epidemiologist, may be called to testify regarding his knowledge of the history of the development of medical knowledge related to asbestos-related disease and epidemiological issues in relationship between asbestos exposure and any increased risk of cancer and life shortening problems not related to alleged asbestos exposure. He may also testify by deposition transcript and trial transcript.

As may be necessary to establish the epidemiological acceptability of certain of Dr. Cooper's assumptions, the defendants may call Dr. Duncan Thomas and/or Dr. Noel Weiss.

Dr. W. Clark Cooper, M.P.H., 2150 Shattuck Avenue, Ste. 811, Berkley, Ca. 94704.

Dr. Pacifico Cordon, Brandon, Florida and/or his custodian of records.

Palmer Covil, Covil Corporation, Greenville, South Carolina. Mr. Covil will testify by deposition as to matters concerning the insulation contracting and supply business including but not limited to work practices, product usage and labeling. Mr. Covil's prior recorded testimony given July 13, 14 and 15, 1977 in Cause Nos. 77-1369 and 77-1384; Evelyn White, et al. v. Combustion Engineering Co., Inc., et al; In the United States District Court of South Carolina - Greenville Division.

Bobby F. Craft, Industrial Health, Inc., 640 East Wilmington Avenue, Salt Lake City, Utah 84106. Dr. Craft may testify as to the history of TLV; State of the Art as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants; the potential of exposure in excess of the TLV as it concerns certain asbestos containing products; and the dust levels created by this defendant's products.

Dr. John E. Craighead, Chairman, Department of Pathology, A249 Given Medical Building, University of Vermont College of Medicine, Burlington, Vermont 05401, (802) 863-8733. Dr. Craighead is a pathologist. He 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; and the effects of exposure to chrysotile fibers on the human body.

Dr. James Crapo, Duke University Medical Center, Box 3177, Room 350 Bell Bldg., Durham, N.C. 27710 (919) 684-6266. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure; 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, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Dallas Cravent, 2104 Randolph Road, Charlotte, North Carolina 28207, and/or his custodian of records.

Crawford Long Hospital, Custodian of Records, 550 Peachtree Street Northeast, Atlanta, Georgia 30365.

Andrea Crichton, Manchester, England.

Bill Culver, P. O. Box A, 102 C Street SW, Auburn, Washington 98001, (206) 763-8623.

David Curreri, Cambridge, MA.

DCH Regional Medical Center, Custodian of Records, 809 University Boulevard, Tuscaloosa, Alabama 35401.

J.N.P. Davies, 5 Pine Street, Albany, New York. State of medical and scientific art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and medical condition of plaintiff(s); 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, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Michael Davis, 6701 Airport Blvd., Mobile, Alabama 36608 and/or his custodian of records.

Dayton-Walther Corporation (or its successor corporation) - certain employees or former employees.

Dr. Mark Deffebach, VA Medical Center, 3710 S.W. U.S. Veterans Road, Portland, Oregon 97201 (503) 220-8262.

Dr. George Delclos, Assistant Professor of Medicine, Baylor College of Medicine, Respiratory Consultants, 6550 Fannin, Houston, Texas. Dr. Delclos is a specialist in the area of respiratory disease. Dr. Delclos may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos-related disease and the basis for such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. John Dement, Duke University Medical School, Department of Occupational & Environmental Medicine, 2200 West Main Street #700, Durham, North Carolina 27710 (919) 286-3232.

Dr. Harry Demopoulos, 550 First Avenue, New York, New York 10016. Dr. Demopoulos is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the 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-ray, 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 all state of the art issues.

Lois Dennis, 2017 Hudson Terrace, Fort Lee, NJ 07024.

Dr. Paul Diamond, Alvin C. York Veteran's Affairs Medical Center, 3400 Lebanon Road, Murfreesboro, Tennessee 37129 and/or his custodian of records.

Dr. Steven Dikman, One Gustave Place, Annenberg Building 15/58, Department of Pathology, New York, New York 10029 (212) 241-7353, (212) 241-8014.

Dr. Dillinger (retired), Rome, Georgia 30161, and/or his custodian of records.

Dr. Peter Ditoro, 930 Franklin Street, Ste. 205, Huntsville, Alabama 35801 and/or his cusodian of records.

Ronald F. Dodson, Ph.D., Chairman, Department of Cell Biology and Environmental Sciences, University of Texas Health Center at Tyler, Office of Associate Director for Research, P. O. Box 2003, Tyler, Texas 75710. Dr. Dodson is an expert in the area of microscopic study relating to pathology. If called, Dr. Dodson will testify regarding: (a) pathological studies, if any, relating to the plaintiff; (b) matters relating to whether the plaintiff has a condition or illness caused by asbestos exposure; and (c) matters relating to lung fiber deposition.

Dr. Scott Donaldson, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, Texas 75080. Dr. Donaldson is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinions regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment

and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Bruce P. Douglas, 2425 Samaritan Drive, San Jose, California 95124, (408) 559-2474.

Dr. John Doull, University of Kansas Medical Center, Department of Pharmacology, Toxicology and Therapeutics, 39th & Rainbow Boulevard, Kansas City, KS 66103. Dr. Doull is expected to testify regarding the protocol, methodology, and analysis of scientific studies including cancer experimentation, custom and practice regarding peer review, and the editing and publishing of scientific work.

Dr. Hardy Downing, 810 Whetstone Street, Monroeville, Alabama 36460 (334) 575-4825.

Edward Drasin, M.D., Radiologist; Radiology Department, Summit Medical Center, Hawthorne and Webster Streets, Oakland, California 94609, (510) 420-6088. Dr. Drasin may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Charles Henry Drummond, III, Ceramic Engineering, Ohio State University, 2041 College Road, Columbus, Ohio 43210.

Dr. Lewis Duncan, 1300 North 4th Street, Longview, Tx. 75601 (903) 757-2122.

Christopher J. Dunn, M.D., Pulmonologist, Internist; 77 Birch Street, Suite A, Redwood City, California 94062 (415) 366-0519. Dr. Dunn may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

William Dyson, Ph.D., Health & Hygiene, Inc. 420 Gallimore Dairy Road, Greensboro, North Carolina. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiff(s); epidemiology and general medicine regarding asbestos exposure; 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, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a bases for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Scott Ebbinghaus, 3049 Fox Trail, Fultondale, Alabama 35068 (205) 631-3199.

Dr. David Egilman, South Shore Health Center, 759 Granite Street, Braintree, Massachusetts 02184-5328 (617) 848-1950.

Dr. Bruce Eich, 801 Princeton, Birmingham, Alabama and/or his custodian of records.

Merril Eisenbud, 711 Bay Berry Drive, Chapel Hill, NC 27514.

Dr. Kenneth E. Ellingwood, 6701 Airport Boulevard, Ste. 106, Mobile, Alabama 36608 (334) 633-1890.

Dr. Horace Elmore, retired, Stephenson, Alabama and/or his custodian of records.

Dr. William Emory, M.D., Ochsner Clinic, 1514 Jefferson Highway, New Orleans, Louisiana 70121, (504) 838-4055. Dr. Emory is a medical doctor. He may testify regarding the medical condition of the plaintiff and about asbestos-related diseases.

Dr. William Eschenbacher, Baylor College of Medicine, Department of Internal/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Eschenbacher may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Charles E. Evans, Jr., P. O. Box 568, East Spencer, North Carolina 28039-0568.

Dr. William Ewing, Government Street, Mobile, Alabama, and/or his custodian of records.

Dr. Farrington, 401 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. Arthur Feinstein, 490 Peachtree St., N.E., Doctor's Bldg., Atlanta, Georgia and/or his custodian of records.

Willie Fields, 4239 South Claiborne Street, New Orleans, La. 70118 (504) 891-5544.

Dr. Gary Fink, P. O. Box 610, Faith, North Carolina 28041 and/or his custodian of records.

Dr. Melvin W. First, Harvard School of Public Health, 655 Huntington Avenue, Boston, MA 02115. Dr. First may testify on matters relating to industrial hygiene, including the methodology of conducting industrial hygiene surveys and reporting and publishing results of industrial hygiene surveys.

Jonathan Fish, M.D., Radiologist; 1844 San Miguel Drive, Walnut Creek, California 94596, (510) 947-0560. Dr. Fish may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Nathan Fochtman, Rt. 6, Box 49, Montevallo, Alabama 35115 (telephone unknown).

Alma Fortenberry, et al. v. Raymark Ind., Inc., et al.,
(depositions) No. B-84-1167-CA (U. S. District Court, Eastern District of Texas, Beaumont Division) (July 25, 1988).

Dr. Gregory Foster, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, TX. 75080. Dr. Foster is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of

establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis and disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Foyd Medical Center, Custodian of Records, Box 233, Rome, Georgia 30162.

Dr. Robert G. Fraser, 2766 Summit Circle, Birmingham, Alabama 35216 (205) 979-1123; Padanarum Road, P. O. Box 558, Bolton Landing, New York 12814 (518) 644-2220.

Dr. Peter Fuchs, St. Vincent Hospital & Medical Center, Department of Pathology, 9205 S.W. Barnes Road, Portland, Oregon 97225, (503) 291-2181.

Dr. Cullie F. Funderbunk, Texas Tech University, 1400 Wallace Boulevard, Amarillo, Texas 79106, (806) 354-5660.

Dr. Edward A. Gaensler, Boston University Medical Center, 80 East Concord Street, Boston, Massachusetts 02118. Dr. Gaensler may testify as to the anatomy and function of the respiratory and circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis, compared with non-asbestotic asbestos workers and with the general population; cigarette smoking and its effect on the lung; the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect; difference between impairment and disability; effect of asbestosis on disability and life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; and the history of evolution and knowledge of asbestos-related diseases.

Dr. Joe G.N. Garcia, The University of Texas Health Center at Tyler, P. O. Box 2003, Tyler, Texas 75710. Dr. Garcia may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population, cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Ted Garcia, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Ignacio Garza, 745 East Street, Brownsville, Texas 78520 (512) 546-1655. An economist who will testify regarding plaintiff(s)' economic damages and related matters.

Gastonia Memorial Hospital, Custodian of Records, 2525 Court Drive, Gastonia, North Carolina 28054.

Dr. Richard Gaze, deceased (by deposition).

Dr. Dominic Gaziano, Chest Medical Services, Inc., 3100 MacCorkle Avenue, S.E., Ste. 404, Charleston, West Virginia 25304.

Dr. Bernard Gee, Yale University, 333 Cedar Street, New Haven, Connecticut 06510. Dr. Gee will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. He will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Georgia Baptist Medical Center, Custodian of Records, 300 Blvd., N.E., Atlanta, Georgia.

M. Eric Gershwin, M.D., Professor of Medicine, Chief, Division of Rheumatology, Allergy and Clinical Immunology, University of California at Davis, Davis, California 95616, (916) 752-2884. Dr. Gershwin is a specialist in the immune system and may testify about the immune system as it relates to the various theories advanced by plaintiffs in the asbestos litigation.

Dr. Allen Gibbs, Llandough Hospital, Penarth, Glamorgan CF61XW. General asbestos-related pulmonary pathology and medical literature relevant thereto; general and asbestos-related pulmonary pathology examination procedures.

Graham W. Gibbs, Ph.D., Box 27, Site 17 RR2, Winterburn, Alberta, Canada T0E 2N0 (403) 987-2883.

Dr. Gibbs has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant asbestos; (f) the 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) characteristics and 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; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Don Gibson, Celotex Corporation, Tampa, Florida. Will testify either by deposition or by prior trial testimony, including trial testimony given in Charlene Yerby, Individually and as Personal Representative of the Heirs and Estate of J. D. Yerby, Deceased, et al. v. Fibreboard Corporation, et al; Cause No. 88-10329M, in

the District Court of Dallas County, 298th Judicial District, dated March 5, 1990. He will testify regarding the authenticity and admissibility of certain Philip Carey Manufacturing Company or Celotex documents and other matters regarding Philip Carey or Celotex. Mr. Gibson's testimony was given in his capacity as Manager of Safety and Property Conservation.

Dr. Valerian A. Gieri, 2031 S. Crockett Street, Amarillo, Texas 79109.

Dr. William Giessel, 215 Milby Street, Houston, Texas 77003, 713-225-0463.

James Girard, Ph.D., 6328 Karmich Street, Fairfax Station, Virginia 22039.

Dr. Larry Gish, 611 Mocksville Avenue, Salisbury, North Carolina 28144 and/or his custodian of records.

John T. Gmelich, M.D., Pathologist; Department of Pathology, Huntington Memorial Hospital, 100 Congress Street, Pasadena, California 91105, (818) 440-5229. Dr. Gmelich may testify regarding the pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Allan Goetsch, 119 Longwood Drive, S.W., Huntsville, Alabama 35801 and/or his custodian of records.

Jeffrey A. Golden, M.D., Pulmonologist, Internist; UC Medical Center, 505 Parnassus, San Francisco, California 94122, (415) 476-1000. Dr. Golden may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Allan Goldstein, Montclair Baptist Medical Center, 850 Montclair Road, Suite 862, Birmingham, Alabama 35213. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos; he will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Dr. Gonzola, Bessemer, Alabama and/or his custodian of records.

Susan Gootnick, M.D., Radiologist; 329 Goodhill Road, Kentfield, California 94904, (415) 461-4006, may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Camal Goral, retired, Lloyd Nolan Hospital, Fairfield, Alabama 35064 and/or his custodian of records.

Dr. John Gotchall, Corvallis Clinic, 3680 N.W. Samaritan Drive, Corvallis, Oregon 97330 (503) 754-1150.

Dr. Ronald Gots, National Medical Advisory Service, 7315 Wisconsin Avenue, Suite 802 West, Bethesda, Maryland, 20814-3292.

Dr. George P. Gray, 204 Lowe Avenue S.E., Huntsville, Alabama and/or his custodian of records.

Dr. Milton Gray, 521 Crestbend, Houston, Texas. Dr. Gray is a medical doctor and a board certified specialist in internal medicine. His testimony may discuss the structure and function of the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

E. Marie Greene, et al. v. Amtorg Trading Corp., et al.
(depositions), Docket No. L-068486-81 (Superior Court of New Jersey Law Division, Middlesex County) (Aug. 23, 1988).

Dr. Donald Greenberg, The Methodist Hospital, Department of Pathology, 6565 Fannin, 2nd Floor, Houston, Texas 77030. Dr. Greenberg is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; the 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 all state of the art issues.

Dr. Claude Grigg, 300 Billingsly Road, Building 200, Charlotte, North Carolina 28211 and/or his custodian of records.

Dr. Joel Grossman, 6576 Airport Boulevard, Ste. C2, Mobile, Alabama 36608 (334) 343-0040.

Dr. David H. Groth, 8953-C Harper Points Drive, Cincinnati, Ohio 45249 (513) 489-6351.

Dr. Paul J. Guentert, 701 East Marshall Avenue, Ste. 302, Longview, Texas 74501 (903) 236-2740.

David S. Gullion, M.D., Oncologist, Internist; 1350 S. Eliseo, Suite 200, Greenbrae, CA 94904, (415) 925-5000. Dr. Gullion may testify regarding the alleged connection between plaintiff's medical condition and his or her alleged asbestos exposure, the

treatment of and prognosis of plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Venkataiah Gutta, Gaffney Medical Center, Box 4, Gaffney, South Carolina 29342 and/or his custodian of records.

HCA Parkridge Medical Center, Custodian of Records, 2333 McCallie Avenue, Chattanooga, Tennessee 37404.

Andrew T. Haas, 13800 Overton Lane, Silver Springs, Maryland. Authentication of asbestos workers magazine, publication and distribution, safety information and meetings and union activities.

John L. Hadley, M.D., Pulmonologist, Internist; Diablo Pulmonary Medical Group, 2222 East Street, No. 300, Concord, California 94520 (510) 676-2942. Dr. Hadley may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Kathryn A. Hale, 6550 Fannin, Suite 1215, Houston, Texas 77030, (713) 790-6492.

Dr. William L. Hall, 4724 Airport Boulevard, Mobile, Alabama 36608 and/or his custodian of records.

J. S. Hamilton, Chicago, Illinois.

Dr. Sam Hammar, Diagnostic Specialties Laboratory, 700 Lebo Blvd., P. O. Box 2171, Bremerton, Washington 98310 (206) 479-7707.

Dr. William C. Hansford, Lloyd Nolan Hospital, Fairfield, Alabama 35064 and/or his custodian of records.

Dr. Russell M. Harley, University of South Carolina, 171 Ashley Avenue, Charleston, S.C. 29401. Dr. Harley is an expert in the field of pathology and the etiology and diagnosis of asbestos-related diseases based upon review of tissue and tissue slides obtained as a result of biopsy or autopsy.

Dr. Randall C. Harper, St. Luke's Lutheran Hospital, 7930 Floyd Curl Drive, San Antonio, Texas 78229.

Dr. Charles Harr, Suite 103, Charlotte Medical Plaza, 300 Billingsly Road, Charlotte, North Carolina 28211 and/or his custodian of records.

Dr. R. Brent Harrison, M.D., The University of Mississippi Medical Center, Department of Radiology, 2500 North State Street, Jackson, Mississippi 39216, (601) 984-2515. Dr. Harrison is a B Reader and may testify regarding the radiographs of the plaintiff and/or plaintiff's decedent.

Dr. Ray A. Harron, 901 West Main, Ste. 101, Bridgeport, West Virginia 26330 (304) 842-6570.

Mr. Richard L. Hatfield, Law Engineering, Inc. 369 Plasters Avenue, Atlanta, Georgia 30324.

Dr. J. D. Havron, retired, South Pittsburgh, Tennessee and/or his custodian of records.

Willis Hazard, 3609 Mapleway Drive, Toledo, Ohio. Industrial hygiene and threshold limit value testimony, product testing, product and/or documentary testimony relevant to defense of plaintiff(s)' claims.

Mr. Richard L. Hatfield, Law Engineering, Inc., 369 Plasters Ave., Atlanta, Georgia 30324.

Dr. Gussie L. Hawkins, V. A. Medical Center, Chattanooga, Tennessee and/or his custodian of records.

Dr. Peter Heidbrink, Southwest Pulmonary Associates, St. Paul Professional Building #2, 5959 Harry Hines Boulevard, Suite 711, Dallas, Texas 75235. Dr. Heidbrink is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette

smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Michael D. Henderson, 330 Rittiman Road, San Antonio, Texas 78209. Dr. Henderson may testify concerning the relationship of asbestosis and smoking to the development of cancers. Dr. Henderson may also testify concerning the incidence of lung cancer among individuals with asbestos or exposure to asbestos-containing products. He may also testify regarding general pathology and the pathology of the plaintiff or plaintiff's decedent.

Michael D. Henderson, M.D., M.P.H., F.A.C.P., F.C.C.P., Internist and Oncologist, 2630 Point del Mar Avenue, Corona del Mar, California 92625-1551, telephone (714) 721-4122. Dr. Henderson may testify regarding the alleged connection between plaintiff's medical condition and his or her alleged asbestos exposure, the treatment of and prognosis for plaintiff's condition and issues of alternative causation.

Dr. D. J. Hennessi, 3280 Howell Mill Road, Ste. 123, Atlanta, Georgia 30327 and/or his custodian of records.

Dr. William C. Hicks, Zeigler Blvd., Mobile, Alabama and/or his custodian of records.

John Higginson, B.A., M.D., F.R.C.P., Department of Community & Family Medicine, 314 Kober-Cogan Hall, Georgetown University Medical Center, 3750 Reservoir Road, N.W., Washington, D.C. 20007. Dr. Higginson is expected to testify regarding the protocol, methodology, and analysis of cancer experimentation, custom and practice regarding peer review and the editing of scientific work; and medical knowledge regarding asbestos.

Dr. Hines, Chesnee, South Carolina, and/or his custodian of records.

Dr. Elliott Hinkes, 301 North Prairie Avenue, Suite 311, Inglewood, California 90301. Dr. Hinkes is a specialist in the area of oncology. Dr. Hinkes may testify as to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; as to exposure to asbestos in regard to development of lung cancer, mesothelioma and other respiratory diseases; as to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion as to whether plaintiff suffers from a respiratory disease and cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the

basis for such opinion; and all other matters concerning plaintiff's medical condition.

Dr. H. Corwin Hinshaw, Sr., Retired Emeritus Professor of Medicine, University of California, School of Medicine, P. O. Box 546, Belvedere, California 94920. Dr. Hinshaw may testify by deposition 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.

Dr. John R. Holcomb, 4410 Medical Drive, Ste. 440, San Antonio, Texas 75229 (210) 692-9401.

Dr. Gerald H. Holman, 6010 Amarillo Boulevard West, Amarillo, Texas 79106 (806) 355-9703.

Dr. Edwin C. Holstein, Environmental Health Associates, P.A., 867 Boylston Street, Boston, Massachusetts 02116 (617) 266-1818.

Dr. Richard J. Horan, Marine Consulting, Inc., Marine Trade Center, Suite 203, P. O. Box 691, Portland, ME 04104.

Dr. Thomas Peter Howard, Osler Clinic of Medicine, Pulmonary Director, 930 South Harbor City Boulevard, Melbourne, FL. 32901. Dr. Howard may testify about matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of plaintiffs. He may also testify about the state of the scientific and medical knowledge concerning asbestos.

Harold Robert Hoyle, by deposition, §Dow Chemical Company, Dow Chemical Building, Midland, Michigan. Will be offered by deposition given in No. B-126,986 Allen v. American Petrofina, to authenticate certain documents.

Dr. Janet Hughes, M.D., Tulane School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Hughes is a biostatistician with expertise in the areas of statistics and epidemiology. She is capable of testifying regarding the dose-response relationship between asbestos exposure and the occurrence of disease, the effect of low level exposure to asbestos, the statistical methods of assessing risks, and other medical issues relating to lung disease and cancer.

William Hughson, M.D., Internist, Pulmonologist, Epidemiologist, Occupational Medicine specialist, 3969 Fourth Avenue, Suite 202, San Diego, CA 92103, (619) 294-6206. Dr. Hughson is board certified in internal medicine, pulmonology and occupational medicine and may testify regarding his knowledge of lungs and thoracic organ functions, the history of development of medical knowledge related to asbestos-related disease and occupational and epidemiological issues in relationship to asbestos exposure,

issues of alternative causation and any increased risk of cancer and life shortening problems not related to alleged asbestos exposure, plaintiff's medical condition and prognosis.

Humana Hospital Brandon, Custodian of Records, 119 Oakfield Drive, Brandon, Florida 33511.

Huntsville Hospital East, Custodian of Records, Huntsville, Alabama.

Dr. Steven Ingram, 2325 N.W. Military, #111, San Antonio, Texas 78231 (210) 341-4448.

In Re: Asbestos Litigation, (depositions) C.A. No. 77C-ASB-32 (Superior Court of the State of Delaware, New Castle County) (Dec. 13, 1991).

In Re: Baltimore City Personal Injury and Wrongful Death Asbestos Cases and Abate, et al. v. ACandS, Inc., et al (depositions), Case No. 89236704 (Circuit Court for Baltimore City, Maryland) (March 22, 1991).

Hugh Jackson, (by deposition) 5205 Skytrail Street, Littleton, Co. 80123.

Dr. Joseph A. Jackson, III, 800 W. Cemetery Street, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. James (Retired), Charlotte, North Carolina and/or his custodian of records.

Dr. Rex L. Janes, V.A. Hospital, Murfreesboro, Tennessee, and/or his custodian of records.

Dr. Dala Joy Rookstool Jarolin, 12305 S. 14th Street, Jenks, Oklahoma 74037-4903. A pulmonary pathologist; based on his review of medical records, including pathology materials, he will testify about the plaintiff(s)' medical condition, and the cause of plaintiff(s)' medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff(s)' specifically, and the effect that other substances have on human health generally and plaintiff(s)' condition specifically.

Dr. Stephen Jenkinson, UT Health Science Center @San Antonio, 7703 Floyd Avenue Drive, San Antonio, Texas 78284-7885. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff(s) and the relationship, if any, to the plaintiff(s)' exposure to asbestos. He will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Dr. Bill Johnson, 2948 Foxhall Circle, Augusta, Georgia 30907
(706) 863-4270.

Dr. Robert W. Johnson, 4970 El Camino Real, Ste. 250, Los Altos,
California 94022 (415) 494-2413.

Dr. Robert Jones, Tulane Medical School, Pulmonary Diseases
Section, 1700 Perdido Street, New Orleans, Louisiana 70112 (504)
588-5265. Dr. Jones is a specialist in the area of respiratory
diseases. Dr. Jones may testify to all matters pertaining to his
examination of the plaintiff and plaintiff's medical records; any
communications with the plaintiff or plaintiff's family; review
of x-rays of the plaintiff; the diagnostic criteria used to
diagnose asbestosis; his opinion regarding whether plaintiff
suffers from asbestos-related disease and the basis of such
opinion; the plaintiff's current medical condition and his
prognosis thereof.

Dr. Elliott Kagan, Georgetown Medical Center, Georgetown
University, Department of Pathology, 4000 Reservoir Rd. N.W.,
Washington D.C. 20007 (202) 687-1345.

Dr. Steven Kalter, 7940 Floyd Curl #720, San Antonio, Texas
78229 (210) 614-3307.

Dr. John Keebler, 6701 Airport Boulevard, Ste. B123, Mobile,
Alabama 36608 (334) 633-2323.

Dr. Kelly, Carolinas Medical Center, Charlotte, North Carolina
and/or his custodian of records.

Dr. R. Emmet Kelly, 665 South Skinker, St. Louis, Mo. 63105.

Dr. Gerald Kerby, M.D., Pulmonary Specialist, University of
Kansas Medical Center, 3900 Cambridge, Kansas City, Kansas
66103. Dr. Kerby is a pulmonary disease specialist. He may
testify to all matters pertaining to scientific knowledge,
research and study of the effects of exposure to asbestos on the
human body; to the latency periods of asbestos-related diseases;
to the various types of asbestos fibers and their effects on the
human body; to the effects of exposure to chrysotile fiber in
regard to asbestos-related diseases; scientific criteria used to
diagnose respiratory diseases, including but not limited to
asbestosis, lung cancer, mesothelioma, to all matters pertaining
to the plaintiff's medical condition; to all state of the art
issues.

Dr. Khuu, U.S.A. Stanton Road Clinic, 575 Stanton Road, Mobile,
Alabama and/or his custodian of records.

Dr. Kaye Kilburn, USC School of Medicine, 2025 Zonal Avenue, Room
201, Los Angeles, California 90033 (213) 3342-1830.

Killian, et al. vs. Eagle-Picher Industries, Inc., et al
(depositions), Case No. 84325057, 84276045 (Circuit Court for
Baltimore City, Maryland) (Dec. 16, 1988).

Dr. Mark Klepper, Pulmonary & Critical Care Consultants, 1305
West 34th Street, Suite 400, Austin, Texas 78705 (512) 453-4071.

Dr. Koger, Alvin C. York Veteran's Affairs Medical Center, 3400
Lebanon Road, Murfreesboro, Tennessee 37129 and/or his custodian
of records.

Richard Samuel Kops, M.D., Pulmonologist, Internist; Diablo
Pulmonary Medical Group, 2222 East Street, No. 300, Concord,
California 94520 (510) 676-2942. Dr. Kops may testify regarding
his knowledge of lungs and thoracic organ functions, plaintiff's
medical condition and prognosis, issues of alternative causation
and life shortening problems not related to alleged asbestos
exposure.

Dr. Rich Kradin, Massachusetts General Hospital, Box 5, 100
Blossom Street, Boston, Massachusetts 92114 (617) 726-5243.

Dr. Kraus, HCA Parkridge Medical Center, 2333 McCallie Avenue,
Chattanooga, Tennessee 37404 and/or his custodian of records.

George M. Kraus, 11 Drake Lane, Upper Saddle River, New Jersey
07458 (201) 327-2105.

Dr. Richard S. Kuebler, 35 Breakers Lane, Ridgeland, Mississippi
39157 and/or his custodian of records.

Dr. Marvin Kushner, State University of New York at Stony Brook,
Health Sciences Center, Basic Science Tower 9, Room 140, Stony
Brook, NY 11794. General and asbestos-related pulmonary
pathology and epidemiology relevant thereto. Cancer issues;
e.g., cancer risk, carcinogenicity of worksite and environmental
chemicals and substances, epidemiology. Medical testimony as to
medical condition of specific plaintiffs as identified during on-
going discovery.

Dr. James R. Kauten, 2001 Peachtree Road, Ste. 440, Atlanta,
Georgia 30309 and/or his custodian of records.

Dr. Constancio Y. King, 3717 Farwell Drive, Amarillo, Texas
79109 (806) 353-3077.

Dr. Gary Kolb, 2101 Hand Avenue, Bay Minette, Alabama 36507
and/or his custodian of records.

Dr. Richard S. Kuebler, 35 Breakers Lane, Ridgeland, Mississippi
39157 and/or his custodian of records.

Dr. Marvin Kuschner, Dept. of Pathology, School of Medicine, Health Sciences Center, State University of New York at Stony Brook, Stony Brook, NY 11794-8622.

Dr. Robert Lampert, Baylor College of Medicine, Department of Internal Medicine/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Lampert may testify to all matters pertaining to his examination of a plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Arthur Langer, Ph.D., Applied Sciences Institute, Brooklyn College - CUNY, Bedford Avenue & Avenue H, Brooklyn, New York (718) 951-4242. Dr. Langer will testify regarding: (a) asbestos and asbestos-containing products generally; (b) what occurs when asbestos-containing products are cut, sawed and handled; (c) the composition of asbestos-containing friction products and the dust levels created by such products; (d) the percentage and type of asbestos fibers contained in such products and the propensity of such products to produce respirable asbestos fibers when cut, handled or otherwise disturbed, as well as to the dust found in brakes and wheels after braking; (e) specific tests performed on such products, the results of such tests, and whether recall of such products should have taken place; (f) the availability of materials as substitutes for asbestos; (g) the utility of asbestos-containing friction products and that such products are not unreasonably dangerous; and, (h) the knowledge of the scientific community of the above.

Jeffrey S. Lee, Building 512, University of Utah, Salt Lake City, Utah 84112. Dr. Lee 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 1960s or early 1970s.

Dr. Peter Lees, Baltimore, MD.

Dr. Richard A. Lemen, Public Health Service, Deputy Director, National Institute of Occupational Safety and Health, Centers for Disease Control, 1600 Clifton Road, N.W. Bldg. 1, Rm. 3007, MS/D35, Atlanta, Georgia 30333 (404) 639-3773.

David A. Levene, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Lester Levin, c/o Drexel University, Philadelphia, Pennsylvania.

Dr. Steven Levin, Department of Environmental Medicine, Mt. Sinai Medical School, One Gustave Levy Place, New York, New York (212) 241-7810.

Dr. Martin Lewis, Palms of Pasadena Hospital, 1501 Pasadena Avenue South, St. Petersburg, Florida (813) 341-7505.

Alvaro Lievano, P. O. Drawer T, East Point, Georgia 30344 and/or his custodian of records.

Alan Lifshay, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-1894. Dr. Lifshay may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. David Lilienfeld, Box 1057, Mt. Sinai School of Medicine, 1 Gustave Levy Place, New York, New York 10029-6574 (212) 241-4785.

Dr. Bruce Linsky, 701 Lloyd Nolan Parkway, Fairfield, Alabama and/or his custodian of records.

Lloyd Nolan Hospital and Emergency Room, Custodian of Records, 701 Lloyd Nolan Parkway, Fairfield, Alabama 35064.

Dr. Charles Lockard, 102 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. James E. Lockey, M.D., M.S., 3848 Chimney Hill Drive, Cincinnati, Ohio 45241. Dr. Lockey 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 disease, and the effect of other substances on the respiratory system. Dr. Lockey may give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge.

Dr Daniel Lorch, 500 Vanderbeg Drive, Brandon, Florida 33511 and/or his custodian of records.

Dr. Cynthia Lorino, 6701 Airport Boulevard Ste. B-101, Mobile, Alabama 36609 (334) 633-2704.

Dr. Gaeton D. Lorino, 6701 Airport Boulevard, Suite A-101, Mobile, Alabama 36609 (334) 633-8880.

Courtland Lowe, 6300 Button Gwinett Drive, Atlanta, Georgia 30362.

Dr. Marisa Luna, Selma Pathology Laboratories, P. O. Box 1369, Selma, Alabama 36702.

Donald T. Lunde, M.D., Psychiatrist; 900 Welch Road, Suite 400, Palo Alto, California 94304, (415) 324-2226. Dr. Lunde may testify regarding plaintiff's alleged emotional, mental and psychiatric problems, if any.

Harry MacDannald, M.D., Pulmonologist; Respiratory Medical Group, 130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California 94598, (510) 944-0166. Dr. MacDannald may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of causation and life shortening problems not related to alleged asbestos exposure.

Dr. Thomas Mancuso, 5127 Elsworth, Pittsburgh, Pennsylvania (412) 683-6321.

Dr. Richard Manus (Retired), 1680 Mulkey Road, Ste. C, Austell, Georgia 30001 and/or his custodian of records.

Dr. Eugene Mark, Massachusetts General Hospital, Department of Pathology, 32 Fruit Street, Warren II, Boston, Massachusetts (617) 726-8891.

Dr. Charles David Markle, 1605 Mulkey Road, Austell, Georgia 30001 and/or his custodian of records.

Dr. Gerald E. Markowitz, 160 West 97th Street, New York, New York 10025 (212) 237-8458.

Dr. David M. Martin, South Fulton Medical Center, 1136 Cleveland Avenue, Suite 608, East Point, Georgia 30344 and/or his custodian of records.

Dr. James G. Matrisciano, 207 Highland Park Plaza, Covington, La. 70433, (504) 892-6904.

Dr. Jack Mauldin, 817 Princeton Avenue, S.W., Ste. 302, Birmingham, Alabama 35211 and/or his custodian of records.

Daniel May, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Dr. Frank Mazza, Pulmonary & Critical Care Consultants, 1305 West 34th Street, Ste. 400, Austin, Texas 78705 (512) 453-4071.

Mr. John D. McAllister, deceased (by deposition).

Dr. John McAtee, 110 North Lafayette Street, Mobile, Alabama 36604 (334) 433-3344.

William McCaig, Simpsonville, South Carolina.

Dr. Caroline McCall, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

John D. McCann, 195 Bouffard, LaSalle, Ontario, British Columbia N9J1E9 (519) 734-7889.

Dr. Ben McCubbins, 611 Mocksville Avenue, Salisbury, North Carolina and/or his custodian of records.

Charles McDonald, M.D., Pulmonologist, Internist; Pacific Presbyterian Hospital, 2100 Webster Street, Suite 411, San Francisco, California 94115, (415) 749-5779. Dr. McDonald may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Forde A. McIver, Pathology Associates, P.A., 135 Rutledge Avenue, Charleston, South Carolina 29401. Dr. McIver may testify about the state of the scientific and medical art concerning the potential hazards of asbestos.

Marion McManus, Tecon Services, Inc. 515 Garden Oaks Blvd., Houston, Tx. 77018 (713) 691-2700. Will testify to matters concerning the insulation contracting business, including work practices, product usage and labeling. Utilization of videotaped deposition testimony taken on December 15, 1992 in the Emanuel Rollins' group filed in the 234th Judicial District Court of Harris County, Texas.

Mecklenburg Cardiovascular, Custodian of Records, 1718 E. 4th Street, Ste. 501, Charlotte, North Carolina 28204.

Mecklenberg Neurological, Custodian of Records, Charlotte, North Carolina.

Medical Center Hospital, Custodian of Records, .911 Big Cove Road, S.E., Huntsville, Alabama 35801.

Members of the ACGIH TLV Committee from 1946 to the present.

Memorial Hospital Northwest, Custodian of Records, 1635 North Loop West, Houston, Texas 77005

Metropolitan Hospital, custodian of records, 3223 Howell Mill Road, N.W., Atlanta, Georgia.

Gerald Meyers, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-1894. Dr. Meyers may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Mid-Carolina Consultants, Custodian of Records, Charlotte, North Carolina.

Dr. Joseph M. Miller, RFD 2, Box 245A, Plymouth, NH 03264 (603) 536-3732. Dr. Miller 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.

Dr. Devi P. Misra, 333 Whiteport Drive, Ste. 205, Huntsville, Alabama 35801 and/or his custodian of records.

Mobile Infirmary Medical Center, Custodian of Records, Box 2144, Mobile, Alabama 36652.

Dr. J. Steven Moore, M.D., M.P.H., C.I.H., Associate Professor, Department of Occupational and Environmental Medicine, University of Texas Health Center at Tyler, P. O. Box 2003, Hwy. 271 at Hwy. 155, Tyler, Tx. 75710-2003. Will testify on matters relating to industrial hygiene and occupational medicine.

Dr. Michael Moore, P. O. Box 747, Bessemer, Alabama 35021, and/or his custodian of records.

Dr. Robert W. Morgan, Occupational Medicine, One Lagoon Drive, Suite 145, Redwood City, Ca 94065, (415) 637-0723 may be called to testify on the epidemiological and occupational health issues related to the cause of plaintiff's/decedent's disease, issues of alternative cause and life shortening problems not related to alleged asbestos exposure.

Dr. William K.C. Morgan, University Hospital, University of Western Ontario, P. O. Box 5339, Postal Station A, London, Ontario N6A A5. Dr. Morgan is a Professor of Medicine and Director of Chest Diseases Services at the University of Western Ontario. He was educated in England and Scotland, and among other appointments, is a member of the Advisory Board for Occupational Health & Safety Resource Center 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 asbestosis. He may testify about the state of the medical art as it relates to knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. He may testify about the plaintiff's medical condition. Dr. Morgan may give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge.

Dr. R. C. Morley, 115 Manning Drive, S.W., Ste. A101, Huntsville, Alabama 35801 and/or his custodian of records.

Dr. Stephen Morris, 20 Linden Avenue, N.E., Box 37, Atlanta, Georgia 30365, and/or his custodian of records.

Norman Moscow, M.D., Radiologist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-0337. Dr. Moscow may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Samuel Moyle, Jr., P. O. Box 539, Wallhala, South Carolina 29691 and/or his custodian of records.

Arthur P. Mueller. Will testify by deposition dated February 13, 1985 (videotape) or March 17, 1987 (videotape). Mr. Mueller was with Philip Carey in Research and Development. His testimony relates to the operations of Philip Carey and Philip Carey products and Philip Carey or Celotex documents.

Dr. David F. Musto, Yale University, 333 Cedar Street, New Haven, CT 06510-8009. Dr. Musto is expected to testify on matters relating to medicine and the history of medicine.

Dr. Gerald L. Myers, M.D., Alta Bates Hospital, 3001 Colby Plaza at Ashby, Room 2737, Berkeley, CA 94705. 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.

Nalle Clinic, Custodian of Records, Charlotte, North Carolina.

Mark Nathan, M.D., Cardiologist, Internist; Cardiac Consultants, 917 San Ramon Valley Blvd., Danville, California 94526, (510) 831-1600. Dr. Nathan may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

National Museum of Health and Medicine, Custodian of Records, Armed Forces Institute of Pathology, Walter Reed Army Medical Center, Washington D.C. 20306-6000.

Dr. Richard Nau, 1606 East Kessler, Longview, Washington 98632, (360) 425-5620.

Dr. Karim Nawaz, 1901 Medi Park Drive., Suite 1049, Amarillo, Texas 79106, (806) 355-9248.

Charles B. Neckman, 1151 Cleveland Ave., Ste. D, East Point, Georgia 30344 and/or his custodian of records.

Kenneth Nelson (by deposition), 1894 Millcreek Way, Salt Lake City, Utah 84106.

Neurological Associates, Custodian of Records, East Point, Georgia.

Dr. Gary Newsom, 1607 West Loop 289, Lubbock, Texas 79416 (806) 799-2991.

Dr. Brian Norkiewicz, 3237 91st Street, Lubbock, Texas 79423 (806) 795-5214.

North Jackson Hospital, Custodian of Records, Rt. 1, Box 88, Bridgeport, Alabama 37540.

Dr. Phyllis J. Noss, 4511 Fairway Avenue, Dallas, Texas 75219 (214) 522-0810.

Dr. Onyeso Nwachuka, V.A. Medical Center, Murfreesboro, Tennessee and/or his custodian of records.

Dr. Alton Ochsner, Deceased, Ochsner Clinic, New Orleans, La. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions.

Dr. L. Christine Oliver, Pulmonary and Critical Care Unit, Massachusetts General Hospital, Boston, Massachusetts 02114 (617) 726-1721.

Dr. Elise Olsen, Duke University Medical Center, Durham, North Carolina 27710, and/or her custodian of records.

Dr. George A. Omura, 720 20th Street South, Birmingham, Alabama 35294 (205) 934-3204.

Dr. Robert O'Neal, M.D., The University of Mississippi Medical Center, 2500 North State Street; Jackson, Mississippi 39216-4505. Dr. O'Neal is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the 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 all state of the art issues.

Dr. Raymond Osarogiagbon, Texas Tech University Health Science Center, Department of Internal Medicine, Amarillo, Texas 79106 (806) 742-2011.

Dr. David Ozonoff, Boston University, School of Public Health, Bldg. A-501, 80 E. Concorde St., Boston, Massachusetts 02118 (617) 638-4620.

Dr. David L. Page, Vanderbilt University Medical School, 1211 22nd Avenue south, Room C-3311, Medical Center North, Nashville, TN 37232. General and asbestos-related pulmonary pathology and epidemiology relevant thereto. Cancer issues; e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs, as identified during on-going discovery.

Dr. Keith Parmer, 1013 North Fifth Avenue, Rome, Georgia 30161 and/or his custodian of records.

Dr. Frank Parrott, P. O. Box 637, Salisbury, North Carolina 28144 and/or his custodian of records.

Dr. Pausa (deceased), Custodian of Records, Austell, Georgia 30059.

Walter Payment, Greenville, South Carolina.

Lewis Pechstein. Will testify by deposition; was employed at Philip Carey Manufacturing Company and its successors; testimony relates to the corporate history of Philip Carey, the operations of Philip Carey, Philip Carey products, and Philip Carey or Celotex documents.

Robert E. Peele, 232 Shawnee Estates, Nitro, W. Va. Product testing, industrial hygiene and threshold limit value testimony relevant to defenses of plaintiff(s)' claims.

Dr. William D. Perkins, 701 East Marshall, Suite 300, Longview, Texas 75601 (903) 236-2730.

Dr. Edward Peters, Brookline, MA.

Glen Petersen, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 845-7968. Dr. Petersen may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Jack E. Peterson, 2830 Via Viejas Oeste, Alpine, Ca. 91901. Industrial hygiene issues, including threshold limit values. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions. 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, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Piedmont Hospital, Custodian of Records, 1968 Peachtree Road Northwest, Atlanta, Georgia 30309.

Dr. Stanley Pier, 30240 - 27th Avenue South, Federal Way, Washington 98003 (206) 941-3819. Dr. Pier is a toxicologist who may testify concerning state of the art of asbestos.

Dr. Nanette B. Pinkard, University of Alabama Hospital, Department of Pathology, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4977.

Dr. A. Mitchell Polinsky, Stanford University, Professor of Law and Economics, Crown Quadrangle, Stanford, California 94306-8610. Dr. Polinsky is an expert who may testify about the inappropriateness of punitive damages in this and similar cases based upon research he and others have conducted.

Dr. Doris Pollack, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Charles Powell, Cohrssen Environmental, 2970 Pine Street, San Francisco, Ca. 94115. Industrial hygiene and threshold limit value testimony, product testing, emissions, development of

knowledge regarding asbestos exposure, product and/or documentary testimony relevant to the defense of plaintiff(s)' claims.

Dr. Philip C. Pratt. A pathologist who will testify by deposition transcripts dated June 21, 1988, July 12, 1988, and December 13, 1991, with respect to his personal knowledge and observations involving studies conducted at the Saranac Laboratories.

Leslie Preger, M.D., Radiologist, Peninsula Diagnostic Services, Ltd., 1875 Trousdale Drive, Suite A, Burlingame, CA 94010, (415) 697-7006. Dr. Preger may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Presbyterian Hospital, Custodian of Records, 200 Hawthorne Lane, Charlotte, North Carolina 28204.

Princeton Baptist Medical Center, Custodian of Records, 701 Princeton Avenue S.W., Birmingham, Alabama 35211.

Samuel Travis Pritchett, Ph.D., University of South Carolina, Columbia, SC 29208. Dr. Pritchett is a Professor of Finance and Insurance at the College of Business Administration of the University of South Carolina. He is a chartered life underwriter, chartered property and casualty underwriter, and chartered financial consultant.

Dr. James Pugh, 1900 Randolph Road, Suite 1010, Charlotte, North Carolina 28207, and/or his custodian of records.

Pulmonary Associates, Custodian of Records, Brandon, Florida.

Dr. Robert Quinn, 25 Lake Concord Road, Concord, North Carolina and/or his custodian of records.

Dr. David Raben, Veterans Affairs Medical Center, 700 South 19th Street, Birmingham, Alabama 35233, (205) 933-8101.

Dr. Radford, Cliffside, North Carolina 28024 and/or his custodian of records.

Dr. Richard Rankin, 105 Oakland Avenue, Mt. Holly, North Carolina 28120, and/or his custodian of records.

Dr. D. A. Rao, Lamier Memorial Hospital, 4800 48th Street, Valley, Alabama 36854, (334) 756-3111.

Dr. Elizabeth Rareshide, 3623 Audubon Terrace, Jefferson, La. 70121 (504) 464-8626.

Dr. Charles Ray, 1605 Mulkey Road, Austell, Georgia 30001, and/or his custodian of records.

Redmond Park Hospital and Regional Medical Center, Custodian of Records, 501 Redmond Road, Rome, Georgia 30165.

Dr. Richard J. Reed, Pathology Department, 1405 Foucher Street, New Orleans, La. 70115 (504) 897-8754.

Dr. James Reynolds (retired), W. Henderson Street, Salisbury, North Carolina 28144 and/or his custodian of records.

Dr. David L. Ring, Good Shepherd Medical Center, Longview, Texas 75601 (903) 236-2000.

Dr. James Robb, Cedars Medical Center, 1400 N.W. Avenue, Miami, Florida 33136 (305) 325-5587.

Dr. Robertson, 909 W. Henderson Street, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. Leonard Robinson, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Dr. A. Rodriguez, 285 Boulevard N.E., Atlanta, Georgia 30312 and/or his custodian of records.

Dr. Jay Rodriguez, 1100 Holly Avenue, South Pittsburg, Tennessee 37380 and/or his custodian of records.

Dr. Victor L. Roggli, Duke University Medical Center, Box 3712, Durham, NC 27710. Dr. Roggli is a pathologist who has authored publications in the area of asbestos-associated disease. He is capable of testifying regarding lung burden and the level of asbestos burden which is necessary to cause disease. He is further capable of testifying regarding non-asbestos induced mesothelioma, different types of asbestos fibers and their effect on human lungs, dose-response relationships and the occurrence of disease, the anatomy of the lung, and other medical issues relating to asbestos disease, cancer, and mesothelioma. Dr. Roggli's testimony will be based upon his education, experience, and the literature in his fields of expertise.

Arthur N. Rohl, Ph.D., 10 Stouts Valley Road, Easton, Pennsylvania 18042.

Dr. Ronald Rosen, 1620 Mulkey Road, Austell, Georgia 30001 and/or his custodian of records.

Dr. Arnold M. Rosenberg, Columbia, MD.

Dr. Robert M. Ross, Pulmonary Diseases, 17030 Nanes Drive, Suite 214, Houston, Texas 77090. 713-440-8851. A specialist in the area of respiratory diseases. Will testify as to all matters pertaining to his examination of the plaintiff(s) and

plaintiff(s)' medical records, any communications with the plaintiff(s) or plaintiff(s)' family(ies), review of x-rays of the plaintiff(s), the diagnostic criteria used to diagnose asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff(s)' current medical condition, his prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Ross will also testify about the 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 plaintiff(s) specifically. Dr. Ross will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos. Dr. Ross will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Ross may also testify regarding the medical conditions of each plaintiff, based on review of medical records, x-rays, plaintiff(s)' expert reports and supplemental reports.

Rowan Memorial Hospital, Custodian of Records, 612 Mocksville Avenue, Salisbury, North Carolina 28145.

Dr. Emanuel Rubin, Jefferson medical College, 1020 Locust Street, Suite 279, Philadelphia, Pa. 19107-6799. Dr. Rubin is expected to testify regarding the protocol, methodology, and analysis of cancer research and the protocol and practice regarding the process of editing and peer review of scientific research manuscripts. Dr. Rubin is also expected to testify on matters relating to industrial hygiene.

Dr. Joy Russell, Highway 11 South, Birmingham, Alabama 35021.

Dr. Charles Rutherford, Jr., 3715 Dauphin Street, Mobile, Alabama 36606 and/or his custodian of records.

David S. Safianoff, M.D., Pulmonologist, Internist; Diablo Pulmonary Medical Group, 2222 East Street, No. 300, Concord, California 94520 (510) 676-2942. Dr. Safianoff may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

William K. Salyer, M.D., Pathologist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-0337. Dr. Salyer may testify regarding pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Robert Samuels, New York, New York.

E. Nicholas Sargent, M.D., Radiologist; 121 Sotoyome Street, Santa Rosa, California 95405 (707) 546-4062. Dr. Sargent may testify regarding radiographic evidence of plaintiff's medical condition.

Mr. John Sartain, Consulting Economist, Sartain & Company, 3811 Turtle Creek Centre, Suite 760, Dallas, Texas 75219. Mr. Sartain is an economic consultant and may testify regarding the economic loss incurred by the death of a plaintiff.

With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, medical records, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other diseases or conditions are present in plaintiff. Dr. Sawyer's testimony will be based on his training, experience, education and review of the medical literature concerning asbestos-related disease.

Mr. Frank Scanland, 11390 Idaho, South Gate, California 90280. Mr. Scanland was employed by The Synkoloid Company for a period of time and is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

E. Lynn Schall, 510 Edgewood Drive, Collingswood, New Jersey 08108 (609) 858-0003 or (609) 967-3313.

Dr. Gerritt Schepers, 6527 Sunnyhill Court, McClean, Virginia (703) 790-8616 (Fax).

Dr. Norberto A. Schor, 1430 Tulane Avenue, New Orleans, La. 70112 (504) 588-5224.

Dr. William J. Schulte, 110 N. Lafayette Street, Mobile, Alabama 36604 and/or his custodian of records.

Dr. George F. Scofield, Cunningham Pathology Associates, 1801 1st Avenue South, Birmingham, Alabama 35233 (205) 58-3648.

Philip Scordino v. Owens-Corning Fiberglas Corp., et al.
(depositions), C.A. No. 89-5139(3) and Dwight Copeland v. Metropolitan Life Ins. Co., et al. (depositions), C.A. No. 89-5142(3) (Circuit Court of Jackson County, Ms.) (Feb. 22, 1991).

Dr. Jay T. Segarra, 414 Ward Avenue, Ocean Springs, Mississippi 39564 (601) 875-2954.

Mr. Alan M. Segrave, Materials Analytical Services, Inc., 3597 Parkway Lane, Suite 250, Norcross, Georgia 30092 (404) 448-3200.

Dr. Irving J. Selikoff, dec., Mount Sinai School of Medicine, 1 Gustave Levy Plaza, New York, New York. Dr. Selikoff will testify by deposition taken in Rogers v. Johns-Manville, February 19, 1971, regarding the relationship between asbestos and disease, knowledge concerning same, state-of-the art, and all topics reflected in defendants' deposition designations.

Dr. Gordon Settlow, 5600 Girby Road, Mobile, Alabama 36691 (334) 660-5140.

Roger Shack, P. O. Box 356, Montevallo, Alabama 25115.

Dr. Ishfaq Hussain Shah, 371 6th Street, Gaffney, South Carolina 29340 and/or his custodian of records.

Dr. David Shanks, 1928 Randolph Road, Suite 106, Charlotte, North Carolina 28207 and/or his custodian o records.

Khalil Sheibani, M.D., Pathologist; Western Medical Center, 1001 N. Tustin Ave., Santa Anna, California 92705, (714) 953-3380. Dr. Sheibani may testify regarding pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. James Robert Shepherd, III, University of Texas Health Center at Tyler, Department of Radiology, P. O. Box 2003, Tyler, Texas, 75710. Dr. Shepherd is a specialist in the area of radiology. He may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Russell Sherwin, 2011 Zonal Avenue HMR-201, Los Angeles, Ca. 90033. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos. Dr. Sherwin will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaenslerd and Kerby.

Dr. Allan Shulkin, Medical City Dallas Hospital, 7777 Forest Lane, Suite 202, Dallas, texas, 75230 (214) 934-1593. Dr. Shulkin is a specialist in the area of respiratory disease. Dr. Shulkin may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any

communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related disease and the basis for such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition.

Dr. Dorsett D. Smith, 4310 Colby, Suite 201, Everett, Washington 98203. Historical review and state-of-the art pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto. Cancer issues; e.g. cancer risk, carcinogenicity of workshop and environmental chemicals and substances, epidemiology. 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, will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Dr. James Garland Smith, Jr., Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P. O. Box 33932, Shreveport, La. 71130-3932. A specialist in the area of respiratory diseases. Dr. Smith will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff(s)' medical records, any communications with the plaintiff(s) or plaintiff(s)' family(ies), review of x-rays of the plaintiff(s), the diagnostic criteria used to diagnose asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff(s)' current medical condition, his prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Smith will also testify about the 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 plaintiff(s) specifically. Dr. Smith will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. Kenneth Wallace Smith, deceased (by deposition).

Marshall Smith, et al. and consolidated cases v. Johns-Manville Corp., et al. and Third-Party Actions (depositions), Civil Action Nos. 77-2047, 79-9, 79-1992, 79-2680, 79-2218, 79-3056, 80-179, 80-264 (U. S. District Court, District of New Jersey) (Mar. 22, 1983 and June 13, 1984).

Ralph G. Smith, 27411 Tudor Lane, Franklin, MI 48025.

Wesley D. Snowden, P.E., Bellevue, Wa.

South Fulton Medical Center, Custodian of Records, 1170 Cleveland Avenue, East Point, Georgia 30344.

South Pittsburg Hospital, Custodian of Records, P. O. Box 349, South Pittsburg, Tennessee 37380.

South Point Family Practice, Custodian of Records, 212 Glenway Street, Belmont, North Carolina 28012.

Dr. Selwyn Spangenthal, 1350 S. Kings Drive, Charlotte, North Carolina 28207, and/or his custodian of records.

Spartanburg Regional Hospital, Custodian of Records, 101 E. Wood Street, Spartanburg, South Carolina 29303.

Dr. Jerry Spencer, P. O. Box 6889, Lubbock, Texas 79493-6889 (806) 763-3311.

Dr. Susan Springer, Presbyterian Hospital, Charlotte, North Carolina 27207 and/or her custodian of records.

Springhill Memorial Hospital, Custodian of Records, Box 8246, Mobile, Alabama 36608.

St. Joseph's Hospital, Custodian of Records, 5665 Peachtree, Dunwood Road N.E., Atlanta, Georgia 30342-1701.

St. Joseph's Hospital, Custodian of Records, P. O. Box 4227, Tampa, Florida 33677.

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

Roy Steinfurth, Room 505, Machinist Building, 1300 Connecticut Avenue, N.W., Washington, D.C. Authentication of asbestos workers magazine, publication and distribution, safety information and meetings and union activities.

Dr. R. D. Stephenson, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Dr. Paul M. Stevens, Professor of Medicine, Baylor College of Medicine, Methodist hospital, Houston, Texas 77030. Dr. Stevens is a specialist in the area of respiratory diseases. Dr. Stevens may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition; the anatomy and function of the respiratory

and circulatory systems; the nature of asbestos; the syptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Randy Stewart, P. O. Box 8447, Amarillo, Texas 79114.

Dr. Walter Stewart, Baltimore, Md.

Dr. Gail Stockman, 701 East Marshall, Suite 502, Longview, Texas 75601, (903) 753-0787. Dr. Stockman is a specialist in the area of respiratory diseases. Will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff(s)' medical records; any communication with the plaintiff(s) or plaintiff(s)' family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s)' suffers from asbestos related disease and the basis of such opinion; the plaintiff(s); current medical condition; her prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Stockman will also testify about the 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 plaintiff specifically. Dr. Stockman will also testify concerning those areas described for witnesses Demopoulos, Weill, Craighead, Gaensler and Kerby. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiff(s). Epidemiology and general medicine regarding asbestos exposure. 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, will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a base for opinion, will rely in

part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Herbert E. Stokinger, 9 Twin Hills Ridge Drive, Cincinnati, OH 45228.

Allen Stringer, Libby, MT.

Michael S. Stulbarg, M.D., Pulmonologist, Internist; University of California Medical Center, room M-1093 505 Parnassus Avenue, San Francisco, California 94122, (415) 476-1596. Professor of Clinical Medicine and Director of Clinical Pulmonary Science, Moffitt Hospital. Dr. Stulbarg may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Vijay Subbarao, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Surgical Associates, Custodian of Records, Atlanta, Georgia.

Dr. Richard C. Tannen, 8 Medical Parkway, Ste. 201, Dallas, Texas 75234 (214) 243-8363.

Mitchell Tarkoff, M.D., Pulmonologist, Internist; 350 - 30th Street, Suite 526, Oakland, California 94609, (510) 451-6026. Dr. Tarkoff may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Robert Taylor, Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P. O. Box 33932, Shreveport, La. 71130-3932. Dr. Taylor is a specialists in the area of respiratory diseases. Will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff(s)' medical records; any communication with the plaintiff(s) or plaintiff(s)' family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s)' suffers from asbestos related disease and the basis of such opinion; the plaintiff(s); current medical condition; her prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Taylor will also testify about the 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 plaintiff specifically. Dr. Taylor will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. D. T. Thomas, 1609 Drayton Street, Gastonia, North Carolina 28056 and/or his custodian of records.

Duncan Thomas, Ph.D., Epidemiologist, USC School of Medicine, Department of Preventive Medicine, 2025 Zonal Avenue, Los Angeles, Ca 90033 (213) 224-7434. Dr. Thomas may be called to testify regarding his knowledge of and the history of epidemiological principles in relation to asbestos exposure and smoking and any increased risk of cancer and life shortening problems. He may also testify by deposition transcript and trial transcript.

Dr. E. Mauricer Thomason (retired), Houston, Texas and/or his custodian of records.

Dr. Evaline J. Thompson, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Dr. G. Richard Thompson, Box 1203, Clemson, South Carolina 29633 (803) 656-0946.

Dr. W. R. Thompson, Jr., 102 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. Mark Thorson, 748 14th Avenue, Longview, Washington 98632, (206) 636-0040.

Dr. Arthur Judson Tillinghast, Schumpert Medical Center, 850 Olive Street, Suite A, Shreveport, La. 71104 (318) 222-3662. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Joseph Timmons, Sr., Travelers Rest, South Carolina.

Dr. Morris B. Trowtato, Atlanta, Georgia and/or his custodian of records.

Trudeau Foundation, Custodian of Records, Alogquin Avenue, Saranac Lake, New York.

Dr. Allan Tucker, USA Medical Center, Department of Pathology, Mobile, Alabama.

Dr. Bruce A. Tucker, 833 Princeton Avenue, S.W. Birmingham, Alabama 35211 and/or his custodian of records.

Reverend Louis Turner, 406 Pine Tree Drive, Salisbury, North Carolina 28144 (704) 636-9558.

Vernon Turner, 20007 Highway 216, Vance, Alabama.

Arthur Typermass, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

University of Alabama Hospital, Custodian of Records, 619 S. 19th Street, Birmingham, Alabama 35233.

Upstate Carolina Medical Center, Custodian of Records, 1530 N. Limestone Street, Gaffney, South Carolina 29340.

U.S.A. Clinic Physicians, 2451 Fillingim Street, Mobile, Alabama 36617 and/or their custodian of records.

U.S.A. Stanton Road Clinic, Custodian of Records, 575 Stanton Road, Mobile, Alabama.

Dr. Joe Utly, 100 Wood Street, Spartanburg, South Carolina and/or his custodian of records.

Kenneth J. Vandavelde, Associate Dean of the Western State University Law School, San Diego, California (619) 297-9700. Will testify concerning whether equal treaty rights exist between Canada and the United States of America and related issues.

Veteran's Administration Clinic Physicians, 6200 East Gate Shopping Center, Chattanooga, Tennessee and/or their custodian of records.

Veteran's Affairs Medical Center, Custodian of Records, 1310 24th Avenue, Nashville, Tennessee 27212.

Veteran's Affairs Medical Center, Custodian of Records, Chattanooga, Tennessee.

Veteran's Affairs Medical Center, Custodian of Records, Murfreesboro, Tennessee.

Rodney Vining, Cambridge, MA.

Dr. Mitchell S. Wachtel, VA Medical Center, 3710 S.W. U.S. Veterans Road, Portland, Oregon 97201, (503) 220-8262.

Dr. J. C. Wagner, MRC External Staff, Tea Occupation Lung Disease, Llandough Hospital, Penarty, Glamorgan, CF6-1XW, UK. Dr. Wagner may give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge.

Dr. Joseph K. Wagoner (by deposition).

Richard S. Walsh, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Robert Walsh, Cambridge, MA.

Charles A. Webster, M.D., F.A.C.C., Cardiologist, Consultative Cardiology, 3300 Webster Street, Suite 710, Oakland, California 94609, (510) 832-4402. Dr. Webster may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Hans Weill, Tulane University, School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Weill is a pulmonary disease specialist. Dr. Weill may testify as to all matters pertaining to scientific knowledge, research and study in regards to exposure to asbestos and its effects on the human body; as to the latency periods of asbestos related diseases; as to the various types of asbestos fibers and their effects on the human body; as to the effects of exposure to the chrysotile fiber in regard to asbestos related diseases; scientific criteria used to diagnose respiratory disease, including but not limited to asbestosis, lung cancer, mesothelioma; as to all matters pertaining to the plaintiff's medical condition; as to all state of the art issues.

Paul Weiner, 667 Madison, New York, New York 10021 (212) 739-9400. Mr. Weiner is Sr. Vice President of Rapid; may testify regarding Rapid's financial worth, its business operations, corporate history, the fact that Rapid has never manufactured asbestos-containing products, the impact of asbestos-related litigation on Rapid, facts supporting Rapid's denial of liability for punitive damages, the defenses asserted by Rapid, and other facts relating to Rapid.

Dr. Frank Weir, 8131 Wycomb Drive, Houston, Texas 77070 (713) 995-7532. Dr. Weir is an industrial hygienist who may testify concerning state of the art as it relates to asbestos.

Dr. Weir has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant

asbestos; (f) the 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) characteristics and 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; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Elizabeth Weisburger, Ph.D., 5309 McKinley Street, Bethesda, MD. 20814. Dr. Weisburger will testify regarding the protocol, methodology and analysis of cancer research and the protocol and practice regarding the process of editing and peer review of scientific research manuscripts.

J. S. Weiss, M.D., Toxicologist, Occupational Medicine Specialist, Pathologist and Disability Evaluation Physician; 2120 Carlton Street, Berkeley, California 94704 (510) 849-4237. Dr. Weiss is a specialist in medical toxicology, occupational medicine, pathology and disability evaluation. Dr. Weiss may testify about toxicology and pathology as pertains to alleged asbestos-related diseases in general and plaintiff's medical condition in particular. Dr. Weiss may also testify about occupational medicine and disability evaluation as it pertains to plaintiff's condition and issues of alternative causation.

Noel Weiss, M.D., Epidemiologist; University of Washington, SC36, Health Sciences Building, Room F263-D, Seattle, Washington 98195. (206) 685-1788. Dr. Weiss may testify as to epidemiological issues related to plaintiff's physical condition, the relationship between asbestos exposure and any increased risk of cancer, medical causation and life shortening problems not related to alleged asbestos exposure. Dr. Weiss may also testify as to the state of the art based on his review of the medical literature. His area of expertise is epidemiology and biostatistics with emphasis on the study of cancer.

Dr. William Weiss, Hahnemann Medical College, Philadelphia General Hospital, Philadelphia, Pennsylvania. Historical review and state of the art of pulmonary medicine and asbestos-related conditions. General pulmonary radiology and/or ILO interpretation of x-rays. 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 asbestos to last exposure. As a basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Wells (deceased), Custodian of Records, Seneca, South Carolina.

Dr. Rodney Wertz, 3621 22nd St., #400, Lubbock, Texas 79410 (806) 791-8484.

Dr. Irma West, 8428 Citadel Way, Sacramento, California. Dr. West was the head of the Bureau of Adult Health for the State of California for many years and will testify via videotape about the state of the art knowledge in the occupational health community from time to time and the medical priorities at those times.

Dr. Richard Wetzel, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Kemener Whalen, 5651 Morning Glory Lane, Littleton, Co. 80123.

Dr. George M. Wheatley, 16 Watersedge Ct., Locust Valley, NY.

Dr. Thomas Wheeler, 2929 Eagle Creek, Kingwood, Texas 77345. Dr. Wheeler is a pathologist who may testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the respiratory system. He may also testify about his review of plaintiff's or decedent's medical records and pathology materials and his opinion as to whether plaintiff or the deceased suffers from an asbestos-related disease and the basis of such opinion.

James Whelan, Certified Rehabilitation Counselor, 3031 Tisch Way, Suite 901, San Jose, California 95128, (408) 247-6112. Mr. Whelan may testify regarding plaintiff's prospects for retraining and future employment opportunities.

Dr. Winfry Whicker, P. O. Box 595, China Grove, North Carolina 28023 and/or his Custodian of Records.

Norman Wilder, Internal Medicine Associates, Inc., 2841 Debarr Road, No. 50, Anchorage, Alaska 99508, (907) 276-2811. Dr. Wilder will testify concerning the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs epidemiology and general medicine regarding asbestos exposure. He 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, he will also provide percentages of probability of causation for exposure to

asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Allan S. Wilensky, 801 Princeton Avenue, S.W., Suite 707, Birmingham, Alabama 35211 and/or his custodian of records.

Dr. Williamson (retired), Birmingham, Alabama and/or his custodian of records.

Dr. John F. Willis, 2301 Joseph Street, New Orleans, La. 70115 (504) 587-7625.

Charles F. Wilson. Will testify by deposition.

Dr. R. Keith Wilson, Pueblo Pulmonary Associates, 1925 East Orman, Pueblo, Colorado 81004. Dr. Wilson is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Thomas Winoker, Veterans Affairs Medical Center, 700 South 19th St., Birmingham, Alabama 35233 (205) 933-8101.

Dr. Philip Witorsch, George Washington University Medical Center, 2100 Pennsylvania Avenue, N.W., Ste. 685, Washington D.C. 20037. Dr. Witorsch is expected to testify on matters relating to

occupational medicine and pulmonary medicine, including the methodology of reporting and publishing results of studies.

Otto Wong, Sc.D., P. O. Box 2078, San Mateo, California 94401
(415) 347-7898.

Mr. Wong has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant asbestos; (f) the 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) characteristics and 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; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Dr. George W. Wright, 6405 South Manyon Parkway, Denver, Co. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto. May also provide opinions on the probable 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 basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Dr. Ann Wylie, Colleg Park, MD.

Dr. Tommy Yates, USA Medical Center, Department of Pathology, Mobile, Alabama.

Dr. Fasih Quamar Zaman, 371 6th Street, Gaffney, South Carolina 29340 and/or his custodian of records.

Dr. George Zeigler, Raleigh, North Carolina.

Elias Zerhouni, M.D., Radiologist; John Hopkins Hospital, MRI Room 143, Baltimore, Maryland 21205, (301) 955-4567. Dr. Zerhouni may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Mark W. Zibilich, M.D., Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75246 (214) 820-0111.

Dr. George Zorn, 1900 University Boulevard, Birmingham, Alabama 35294 (205) 934-2536.

Dr. Gordon Zucker, Butte, MT.

Plaintiffs' health care providers may testify, either live or by medical records offered at time of trial, as to their examination of the plaintiffs, their findings, conclusions, testing, test results, and diagnoses; they may also provide factual information as to plaintiffs' smoking history, exposure history, and other medical conditions.

Any and all of plaintiffs' treating physicians whose names, addresses and qualifications are already known to plaintiffs' attorneys to testify as to plaintiff's physical conditions.

Defendant reserves the right to call any expert witnesses designated by plaintiffs or any other defendant in this cause; this includes all treating physicians, healthcare providers, and medical record custodians.

If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.

Kelly Moore also lists all physicians who examined plaintiffs and/or treated or have reviewed medical records, reports, x-rays or pathology slides or reports pertaining to plaintiffs.

Defendant incorporates herein all of the expert witnesses which have been listed or designated by any other party to this litigation.

Defendant also reserves the right to use any affidavits, depositions, answers to interrogatories and responses to request for admissions by any other party to this action, whether or not such party is still a party at the time of the trial.

Defendant further reserves the right to call any witnesses who may be necessary for rebuttal testimony.

Any and all medical experts retained by the law firms of DeHay & Elliston, Baker & Botts, Butler & Binion, Forman, Perry, Watkins & Krutz, Bean & Manning, or any other counsel in their role as liaison defense counsel.

This defendant reserves the right to file a supplemental list of expert witnesses, based on discovery conducted subsequent to the date of preparation of this designation of expert witnesses.

- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you and, if so, identify each such document or report.

ANSWER: See IME reports sent to plaintiffs' counsel and made available to other parties. The IME reports have been or will be produced in some cases by either Kelly Moore Paint Company or other defendants. In the event defendants' experts prepare a report or other documentation for use at trial, such documents will be provided to plaintiffs' counsel by either Kelly Moore Paint Company, Inc. or one of the other defendants.

- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above.

ANSWER: If defendant has provided medical records to a particular physician, a copy of an IME report will be sent to plaintiffs and made available to the other parties. This defendant cannot speculate or state whether other defendants have provided documents to any of the experts identified.

- (f) Describe in detail the education and work history of and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of the resume or curriculum vitae and a list of publications to your answers.

ANSWER: See attached curriculum vitae of Dr. Scott Donaldson and Dr. Gregory Foster (previously filed).