

NO. B-126,986

RUSSELL H. ALLEN, ET AL § IN THE DISTRICT COURT OF
VS. § JEFFERSON COUNTY, TEXAS
AMERICAN PETROFINA, ET AL § 60TH JUDICIAL COURT

MOBIL'S RESPONSES TO SECOND REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANTS

TO: Russell H. Allen, et al, Plaintiffs, by and through their
 attorneys of record, Herschel Hobson, 2190 Harrison,
 Beaumont, Texas 77701

COMES NOW, Defendant Mobil Oil Corporation (including the
responses of Mobil Mining & Minerals Company and Mobil Chemical
Company, Inc.), and pursuant to Rule 167 of the Texas Rules of
Civil Procedure, files its responses to second request for
production of documents, as follows:

I.

PRELIMINARY STATEMENT

Subject to any objections that might be made at the time
of trial as to the admissibility into evidence of the information
contained herein and without waiving any of the same, Defendant
makes the following responses:

II.

RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce a copy of your document retention policies
 this Defendant has used since it began such a policy, but
 not before 1945. This request seeks sufficient
 information to determine when a document retention policy
 began (or if one existed in 1945), what each policy was
 and each change and when each change became effective.

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RESPONSE:

Mobil hereby produces the following documents which may be responsive to the request:

1. Sections of the 1964 policy manual regarding record retention and disposal. (Please note that this is the best copy Defendant could locate, and it is possible that it may not contain each and every page and/or section of the original, due to the passage of time.)

2. 1986 "Record Retention/Disposal Guidelines" for the Beaumont Refinery, which are believed to have been designed to supplement the 1964 manual referenced above.

3. A 1980 pamphlet entitled "Twenty Questions About Records Management In Mobil."

Defendant, in producing the policies requested, cannot affirm that all policies have been observed on all occasions.

Respectfully submitted,

BENCKENSTEIN, NORVELL,
BERNSEN & NATHAN



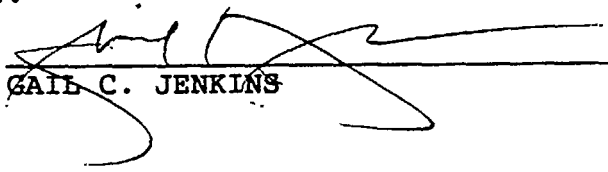
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(409) 833 - 4309

ATTORNEYS FOR DEFENDANT,
MOBIL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been hand-delivered to plaintiffs' counsel on this 30th day of August, 1990.



GAIL C. JENKINS

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August 30, 1990

In Re: Cause No. B-126,986; Russell Allen Consolidated Lawsuit

Mr. Herschel Hobson
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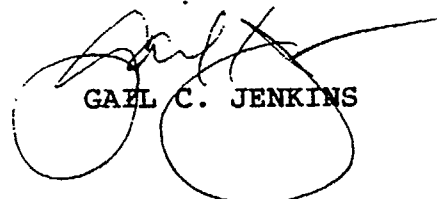
BY HAND DELIVERY

Dear Herschel:

Enclosed please find the following responsive pleadings in reference to the above styled case:

1. Mobil's Responses to Second Request for Production of Documents to Defendants; and
2. Fina's Responses to Second Request for Production of Documents to Defendants.

Sincerely,



GAIL C. JENKINS

HAND DELIVERY

GCJ:pjd
ENCLOSURES
cc: Mr. Joe Blanks
ALL COUNSEL OF RECORD

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