COPY

CAUSE NO. 2000-05-1962-C

ROBERT HENRY VILLARREAL, Individually and as Personal Representative of the Heirs and Estate of JOHN HENRY VILLARREAL	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
vs.	§	CAMERON COUNTY, TEXAS
GAF CORPORATION HOLDINGS, INC., ET AL.	§	
Defendants.	§	197TH JUDICIAL DISTRICT

DEFENDANTS' THIRD AMENDED GENERAL LIST OF MEDICAL, STATE-OF-THE-ART, ECONOMIC, LIABILITY AND DAMAGE EXPERTS

Defendants' General List of Medical, State-Of-The-Art, Economic, Liability, and Damage Experts to the above referenced cases.

Respectfully submitted,

POWERS & FROST, L.L.P.

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of Defendants' Third Amended General List of Medical, State-Of-The-Art, Economic, Liability and Damage Experts has been forwarded to Plaintiffs' counsel of record either by first class mail, return receipt requested, delivery or facsimile on this the 23rd day of January, 2001.

DEFENDANTS' THIRD AMENDED GENERAL LIST OF MEDICAL, STATE-OF-THE-ART, ECONOMIC, LIABILITY AND DAMAGE EXPERTS

1. Dr. Elvin Adams, (by deposition), General Conference of SDA's, 6840 Eastern Avenue, N.W., Washington, D.C. 20012. Testimony will be by deposition given in: "Robert Solomon v. Armstrong, Inc.", No. TY-84-39-CA, in the U.S. District Court for the Eastern District of Texas, Tyler Division.
Dr. Adams will testify on asbestos-related diseases' effects, and in particular on the effects of smoking cigarettes.

2. Dr. Oscar Auerbach, 158 Long Hill Drive, Short Hills, New Jersey 07078.
Dr. Auerbach will testify regarding the pathology of the Plaintiff and/or Plaintiff's decedent. Dr. Auerbach will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

3. Dr. Howard E. Ayer, 2812 Linwood Avenue, Cincinnati, OH 45208, (513) 871-0146.

Dr. Ayer will testify on industrial hygiene and threshold limit values, product testing, emissions, development of knowledge regarding asbestos exposure, product warnings, dust counting equipment and techniques, and/or documentary testimony relevant to the defense of plaintiff(s) claims.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

4. Dr. Stephen Ayres, live or by deposition, Department of Internal Medicine, 1325 South Grand Avenue, St. Louis, MO 63104. If by deposition, testimony will be by deposition given in: "In re: Asbestos Personal Injury Cases" in the following courts: Circuit Court of Baltimore City, Maryland; Circuit Court for Washington County, Maryland; Circuit Court for Prince Georges County, Maryland; Circuit Court for Cecil County, Maryland; Circuit Court for St. Mary's County, Maryland; Superior Court of Washington; District of Columbia, Civil Division; Circuit Court of Alleghany County, Maryland; United States District Court for the District of Columbia; United States District Court of Maryland; and Circuit Court for Baltimore County, Maryland BCA 1 through 4, taken on August 10 through August 12, 1989 in Baltimore, Maryland.

Dr. Ayres will testify on historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. Ayres will testify as to the Saranac papers and that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

5. Dr. Joseph H. Bates, 4300 West 7th Street, Little Rock, Arkansas 72205, (501) 660-2029.

Dr. Bates 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. Bates will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

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

6. Dr. Brian Bradley, The Lung Center, 403 Woodlawn, Pasadena, TX 77504, (713) 941-0088.

Dr. Bradley is a specialist in the area of respiratory diseases. Dr. Bradley will testify as to all matters pertaining to his examination of the plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition, his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Bradley 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. Bradley will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaenster and Kerby. Dr. Bradley may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

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

7. Dr. Kevin Browne, 66a Warwick Way, London, England SW1V 1RZ.

Dr. Brown will testify concerning various cancer issues, including risk of cancer, 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. Brown will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

8. Louis Burgher, M.D., Ph.D., 145 North Tower Doctors Building, 4242 Farnam Street, Omaha, NE 68131, (402) 559-2040.

Dr. Burgher will testify regarding the development of medical and scientific knowledge with respect to asbestos-related diseases in general, and with respect to 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 various disease processes. In doing so, this

witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure

9. Dr. Sam H. Cade, Jr., Radiology Department, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75242, (214) 820-8228.

Dr. Cade is a B reader and will testify regarding the radiographs and CT Scans of the Plaintiff and/or Plaintiff's decedent

10. Dr. Philip Cagle, Pathologist, 1200 Moursund, Room 286A, Baylor College of Medicine, One Baylor Plaza, Houston, Texas 77030, (713) 798-3671.

Dr. Cagle is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically. Dr. Cagle is a pathologist who will testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the plaintiff. Dr. Cagle may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

11. Gregorio I. Casar, M.D., Smith Tower, 6550 Fannin, Ste. 2321, Houston, TX 77030, (713) 791-9989.

Dr. Casar is a specialist in the area of respiratory diseases. Dr. Casar will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Casar 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. Casar will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Casar may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Casar will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and

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

12. Dr. Andrew Churg, The University of British Columbia, 2211 Wesbrook Mall, Vancouver, B. C. Canada V6T1W5.

Dr. Churg will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Dr. Churg may also testify regarding his review of the pathology of the Plaintiff(s) and/or Plaintiffs' decedent.

13. Dr. Thomas V. Colby, Department of Laboratory Medicine and Pathology, Mayo Clinic, 13400 E. Shea Blvd., Scottsdale, AZ 85259 (602) 301-7099.

Dr. Colby will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

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

Dr. Craft will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's.

15. Dr John E Craighead, Chairman, Department of Pathology, A249 Given Medical Building, University of Vermont College of Medicine, Burlington, Vermont 05401, (802) 425-3480.

Dr. Craighead will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto. Cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

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

16. Dr. James Crapo, 4650 South 4th Street, Englewood, CO 80110, (303) 221-6695.

Dr. Crapo 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.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

17. Dr. Johanna Davies, 5 Pine Street, Albany, NY, (518) 262-5345.

Dr. Davies will testify regarding the development of medical and scientific knowledge with respect to asbestos-related diseases in general, and with respect to the medical condition of plaintiffs.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

18. Dr. George Delclos, Pulmonary Section F907, Methodist Hospital, 6550 Fannin, Suite 2403, Houston, Texas 77030, (713) 790-6250.

Dr. Delclos is a specialist in the area of respiratory diseases. Dr. Delclos will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Delclos 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. Delclos 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. Delclos will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

19. Dr. Harry B. Demopoulos, Pathologist, Health Maintenance Programs, Inc., 7 Westchester Plaza, Elmsford, NY 10523, (914) 592-3155.

Dr. Demopoulos will testify regarding historical review and state of the art of asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto, various cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

Dr. Demopoulos will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with

asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, the witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

It is also expected that Dr. Demopoulos will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases in the late 1960's or early 1970's. Dr. Demopoulos will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

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

Dr. Donaldson is a specialist in the area of respiratory diseases. Dr. Donaldson will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Donaldson 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. Donaldson 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. Donaldson will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases

with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

21. William Dyson, Ph.D., Workplace Hygiene, L.L.C., 6518 Airport Parkway, Greensboro, NC 27409, (336) 931-0300.

Dr. Dyson will testify regarding 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 various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

22. William Lee Eschenbacher, M.D., F988, Pulmonary Function Laboratory, The Methodist Hospital, 6565 Fannin Street, Houston, Texas 77030, (713) 790-2076.

Dr. Eschenbacher is a specialist in the area of respiratory diseases. Dr. Eschenbacher will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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 bases of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Eschenbacher 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. Eschenbacher will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Eschenbacher may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Eschenbacher will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease

with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

23. Dr. Gregory Foster, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, Texas 75080, (214) 680-0666.

Dr. Foster is a specialist in the area of respiratory diseases. Dr. Foster will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Foster 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. Foster 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. Foster will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

24. Dr. Edward A. Gaensler, 63 Eucalyptus Knoll, Mill Valley, CA 94941, (415) 381-5863.

Dr. Gaensler will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology and epidemiology relevant thereto, various cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology, cancer causation and lack of association of various types and forms of cancer with asbestos.

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

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, the witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.
It is also expected that Dr. Gaensler will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's. Dr. Gaensler will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

25 Michael A. Graham, M.D., Division of Forensic and Environmental Pathology, St. Louis University School of Medicine, 1402 Grand Avenue Boulevard, St. Louis, MO 63104, (314) 577-8298

Dr. Graham is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effects on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically. Dr. Graham is a pathologist who will testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the

plaintiff. Dr. Graham may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

26. Dr. Donald Greenberg, The Methodist Hospital, Department of Pathology, 6565 Fanning, 2nd Floor, Houston, Texas 77030, (713) 723-9041. By deposition given in the case of Spruit v. The Celotex Corporation, et al, CA3-85-1979-D, U.S. District Court for the Northern District of Texas, Dallas Division.

Dr. Greenberg will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery

27. Kathryn A. Hale, M.D., Assistant Professor of Medicine, Baylor College of Medicine and The Methodist Hospital, 6550 Fannin, Smith Tower #1236, Houston, TX 77030, (713) 790-2076.

Dr. Hale is a specialist in the area of respiratory diseases. Dr. Hale will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(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(s') current medical condition; her prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Hale 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. Hale will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Hale may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

Dr. Hale will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and

life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

28. Dr. Peter Heidbrink, Board Certified Pulmonary Specialist at Southwest Pulmonary Associates, St. Paul Professional Building #2, 5959 Harry Hines Boulevard, Suite 711, Dallas, Texas 75235, (214) 879-6555.

Dr. Heidbrink is a specialist in the area of respiratory diseases. Dr. Heidbrink will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Heidbrink 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. Heidbrink 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. Heidbrink will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

29. Dr. Elliott Hinkes, Board Certified Oncologist and Hematologist at 301 North Prairie Avenue, Suite 311, Inglewood, California 90301, (213) 674-0050.

Dr. Hinkes will testify regarding various cancer issues including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology, cancer causation and lack of association of various types and forms of cancer with

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

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

30. Dr. H. Corwin Hinshaw (by deposition), retired Emeritus Professor of Medicine at the University of California School of Medicine, P.O. Box 546, Belvedere, California 94920, (415) 435-9512. Testimony will be by deposition given in "In Re: Related Asbestos Cases", No. C-83-6251-RFP, in the United States District Court for the Northern District of California; "In Re" Related Shipyard and Applicator Cases: Alameda County Asbestos Litigation", in the Superior Court of the State of California, in and for the County of Alameda; Misc. No. 959, "In Re: Shipyard and Applicator Cases" (Clapper & Brayton) Consolidated for Discovery, in the Superior Court of the State of California, in and for the County of Solano; and "In Re" San Francisco Asbestos Complex Litigation", in the Superior Court of the State of California, in and for the City and County of San Francisco. "Jimmie L. Vaughan v. Johns-Manville, et al", No. CA3-81-0070-F.

Dr. Hinshaw will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary medicine and epidemiology relevant thereto.

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

It is also expected that Dr. Hinshaw will testify that the medical community could not become aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases until the late 1960's or early 1970's. Dr. Hinshaw will not testify con-

cerning the diagnosis or physical condition of these particular Plaintiffs. See above listed depositions for additional opinions.

31. Dr John R. Holcomb, Pulmonary Physicians, 4410 Medical Drive, Ste. 440, San Antonio, TX 78229, (210) 692-9400.

Dr. Holcomb is a specialist in the area of respiratory diseases. Dr. Holcomb will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Holcomb 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. Holcomb will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Holcomb may also testify regarding the medical conditions of each plaintiff based on review of medical records, x-rays, plaintiff's experts' reports and supplemental reports.

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

32. Thomas Howard, M.D., Osler Medical Center, Suite 300, 930 South Harbor City Blvd., Melbourne, FL 32901, (407) 725-5050.

Dr. Howard will testify regarding 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 basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

33. William Hughson, M.D., 3969 4th Avenue, Suite 202, San Diego, CA 92103, (619) 294-6206.

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 basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seldman and Selikoff, Morgan, and Lampshear, among others.

34. Dala Joy R. Jarolim, M.D., FACP, 12305 S. 14th Street, Jenks, Oklahoma 74037-4903, (918) 622-6233.

Dr. Jarolim is an oncologist and will testify regarding the diagnosis of cancer, the inability of asbestos to cause cancer in various sites throughout the human body, other potential causes of cancer, whether or not the cancer alleged by Plaintiff was caused by exposure to asbestos.

35. Dr. Robert Jones, Tulane Medical School, 1700 Perdido Street, New Orleans, Louisiana, (504) 588-5265.

Dr. Jones is a specialist in the area of respiratory diseases. Dr. Jones will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Jones 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. Jones 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. Jones will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

36. Dr. Gerald Kerby, Kansas University School of Medicine, 3900 Cambridge, Kansas City, KS, (913) 588-6045.

Dr. Kerby is a specialist in the area of respiratory diseases. Dr. Kerby will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Kerby 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. Kerby 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. Kerby will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and

life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

37. Arthur Langer, Ph.D., Institute of Applied Sciences, Brooklyn College of the City University, New York, New York, (718) 951-4793.

Dr. Langer is a mineralogist with a Ph.D. from Columbia University. Dr. Langer is a professor of mineralogy at City University, New York, New York, and director of the Environmental Sciences Laboratory of the Institute of Applied Sciences, Brooklyn College of the City University of New York. Dr. Langer is expected to identify and describe the various methods by which inorganic material, from aerosols, bulk samples, or tissue, may be analyzed chemically, crystallographically, and structurally.
Dr. Langer is expected to testify about the various types of asbestos fiber, the geographic locations where the fibers can be found, the potential biologic activity of the various fibers in the human lung (including inorganic toxicity), the physical and chemical characteristics of the various asbestos fibers, and the identification and characterization of asbestos fibers.

Dr. Langer is expected to testify as to the types of inorganic minerals found in the lung tissue of persons with malignant mesothelioma and which are associated with the incidence of malignant mesothelioma in humans. Dr. Langer is expected to identify the types of fiber that have been shown to create an increased risk for malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of malignant mesothelioma. Dr. Langer is expected to testify as to the potential for certain finished asbestos containing products to be contaminated with inorganic minerals and the amounts of the type of trace contaminants that may be found in the products. Dr. Langer is expected to offer testimony as to the amount of contaminants that are found in finished asbestos-containing products--if any--and the chemical, crystallographic, and structural composition of the contaminants. Dr. Langer is expected to testify as to the levels of airborne contaminants that can be generated from a finished product--if any. Dr. Langer is expected to testify, based upon his review of the literature and of evidence of exposure, that exposure to certain encapsulated products did not result in a release of any contaminants sufficient to cause disease in persons such as plaintiff. Dr. Langer is expected to testify that his work, and the literature, do not establish that certain encapsulated products are contaminated with tremolite asbestos. A copy of Dr. Langer's C.V. will be made available upon request.

38. James E. Lockey, M.D., M.S., 3848 Chimney Hill Drive, Cincinnati, Ohio 45241.

Dr. Lockey will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

39. Dr. John C. Maddox, Department of Pathology, Riverside Hospital, J. Clyde Morris Blvd., Newport News, Virginia 23601, (757) 594-2000.

Dr. Maddox shall testify as to the pathological diagnosis of asbestosis, lung cancer, colon cancer and mesothelioma, and the association between asbestos (including the various types) and the alleged disease process involving the plaintiff. Dr. Maddox will further testify as to the contribution, if any, of exposure to John Crane's products in the causation of the plaintiff's asbestos-related disease. Finally, Dr. Maddox shall testify, in cases where sufficient lung tissue is available, as to the burden of asbestos (including the various types) in plaintiff's lungs and its contribution, if any, in causing plaintiff's asbestos-related disease.

40. Dr. Forde A. McIver, (by deposition), Pathology Associates, P.A., 135 Rutledge Avenue, Charleston, South Carolina 29401, (843) 577-1057. Testimony will be by deposition in "O.L. Allen v. Fibreboard Corporation", No. B-81-276-CA, in the U.S. District Court for the Eastern District of Texas, Beaumont Division, taken on April 9, 1982.

Dr. McIver will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. McIver will testify as to the Saranac papers and to the effect that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's. See deposition for additional opinions.

41. Dr. Joseph M. Miller, Box 365, New Hampton, New Hampshire.

Dr. Miller will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions. Dr. Miller will testify as to the Saranac papers and to the effect that the Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's.

42. William K.C. Morgan. M.C.. University Hospital. University of Western Ontario. Post Office Box 5339. Postal Station A. London. Ontario. Canada N6A 5A5. (519) 663-3606.

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 Occupation Health & Safety Resource Center at the University of Western Ontario. He has knowledge of the pathology. diagnosis. testing and causation of pulmonary and related diseases. including mesothelioma. lung cancer and asbestosis. He will 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. Dr. Morgan will also testify as to the Saranac papers and to the effect that Defendants could not have known end users were at risk until approximately the late 1960's or early 1970's. He may testify about the plaintiffs' medical condition.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so. this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

43. Jack E. Peterson. M.D.. 2830 Via Viejas Oeste, Alpine, CA 91901, (619) 445-9668.

Industrial hygiene issues including threshold limit values. Historical review and state of the art of pulmonary medicine and asbestos-related conditions.

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.

44. Dr. Sheldon Rabinovitz. 966 Hungerford Drive. Suite 20. Rockville. MD 20852.

Dr. Rabinovitz will testify regarding the quantity and quality of information available to defendants relating to asbestos and its ability to cause disease and the reasonableness of the response thereto.

Dr. Rabinovitz will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of various disease processes. In doing so. this

witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

45. Dr. Jon Ritter, Division of Surgical Pathology, Suite 300, Peters Building, Barnes Hospital, One Barnes Hospital Plaza, St. Louis, MO 63110, (314) 362-0105.

Dr. Ritter is a pathologist. Based on his review of medical records, including pathology materials, he will testify about the Plaintiff's(s') medical condition, and the cause of Plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and Plaintiff's(s') specifically, and the effect that other substances have on human health generally and Plaintiff's(s') condition specifically. Dr. Ritter may also testify regarding the medical conditions of each Plaintiff based on review of medical records, x-rays, Plaintiff's(s') experts' reports and supplemental reports.

46. Dr. Victor L. Roggli, Duke University Medical Center, Dept. of Pathology, Box 3712, Durham, North Carolina 27710, (919) 286-0411.

Dr. Roggli is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff's(s') specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically.

47. Robert M. Ross, M.D., Smith Towers, 6550 Fannin, Suite 2403, Houston, Texas 77030, (713) 383-6100.

Dr. Ross is a specialist in the area of respiratory diseases. Dr. Ross will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(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 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 regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and

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

48. Wayne Ruhter and Helen Reynolds, Ruhter & Reynolds, Inc. 3625 N. Hall Street, Suite 1060, Dallas Texas 75219 (214) 291-8100.

Wayne Ruhter and Helen Reynolds are economists and may testify regarding any economic loss alleged by the plaintiff.

49. Dr. Irving J. Selikoff, Deceased, Mt. Sinai School of Medicine, One Gustave Levy Plaza, New York, NY.

Dr. Selikoff will testify by deposition taken in Rogers v. Johns-Manville, on February 19, 1971, regarding the relationship between asbestos and disease, knowledge concerning same in state of the art, and all topics reflected in defendants deposition designations.

50. Dr. Kahili Sheibani, Department of Pathology, Western Medical Center, 1001 N. Tuston Ave., Santa Anna, CA 92705, (714) 953-3554.

Dr. Sheibani will testify regarding the pathology of the Plaintiff and/or Plaintiff's decedent. Dr. Sheibani will also testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during ongoing discovery.

51. Mr. Russell D. Sherwin, 2011 Zonal Avenue, HMR-201, Los Angeles, California 90033-1054

Dr. Sherwin will testify regarding general and asbestos-related pulmonary pathology and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Dr. Sherwin will testify regarding the pathology of the Plaintiff(s) and/or Plaintiffs' decedent.

52. Dorsett D Smith, M.D., 4310 Colby, Suite 201, Everett, WA 98203, (206) 259-5171.

Historical review and state of the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto, cancer issues, including risk of cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology.

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.

53. Jesse Steinfield, (by deposition).

Jesse Steinfield will testify concerning government warnings, union knowledge, smoking, and some areas of state-of-the art.

54. Dr. Paul M. Stevens, Board Certified Pulmonary Disease Specialist and Professor of Medicine at the Baylor College of Medicine in Methodist Hospital in Houston, Texas, (713) 790-6492.

Dr. Stevens is a specialist in the area of respiratory diseases. Dr. Stevens will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Stevens 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. Stevens 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. Stevens will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

55. Gail Stockman, M.D., 815 North Fourth Street, Suite A, Longview, TX 75601, (903) 753-0787.

Dr. Stockman is a specialist in the area of respiratory diseases. Dr. Stockman will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with plaintiff(s) or plaintiff's(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(s') current medical condition; her prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(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 testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions and will further testify to the effect that Defendant could not have known end users were at risk until approximately the late 1960's or early 1970's.

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

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

Dr. Wagner will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general and asbestos-related pulmonary pathology, and epidemiology relevant thereto.

This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure.

57. Dr. Hans Weill, live or by deposition testimony in "Ernest Howell v. Armstrong World Industries, Inc., et al", No. M-80-169-CA, in the U.S. District Court for the Eastern District of Texas, Marshall Division, in the U.S. District Court for the Eastern District of Texas, Tyler Division, a Board Certified Pulmonary Specialist at Tulane Medical School, 1700 Perdido Street, New Orleans, Louisiana, 70310, (504) 588-5838.

Dr. Weill will testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community's awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure. Dr. Weill will testify regarding historical review and state of the art of pulmonary medicine and asbestos-related conditions, 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.

It is also expected that Dr. Weill will testify that the medical community became aware that insulators with prolonged intense exposure might be at risk for asbestos related diseases in the late 1960's or early 1970's. Dr. Weill will not testify concerning the diagnosis or physical condition of these particular Plaintiffs.

58. William Weiss, M.D., c/o Hahnemann University Hospital, Philadelphia General Hospital, Philadelphia, PA, (215) 762-7000.

Dr. Weiss will testify regarding the historical review and state of the art of pulmonary medicine and asbestos-related conditions, general pulmonary radiology and/or ILO interpretation of x-rays.

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.

59. Dr. Thomas Wheeler, (by deposition), The Methodist Hospital, Department of Pathology, 6565 Fannin Street, Mail Station 205, Houston, Texas 77030, (713) 790-3311.

Dr. Wheeler will testify regarding general pathology and the pathology of the Plaintiff and/or Plaintiff's decedent.

60. Dr. Mark Robert Wick, Division of Surgical Pathology, Box 214, University of Virginia, Medical Center, Charlottesville, Virginia 22908, (804) 924-9038.

Dr. Wick is a pathologist. Based on his review of medical records, including pathology materials, he will testify about the Plaintiff's(s') medical condition, and the cause of Plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and Plaintiff's(s') specifically, and the effect that other substances have on human health generally and Plaintiff's(s') condition specifically. Dr. Wick may also testify regarding the medical conditions of each Plaintiff based on review of medical records, x-rays, Plaintiff's(s') experts' reports and supplemental reports.

61. Dr. R. Keith Wilson, 2753 S. Utica, Tulsa,Oklahoma, 74114.

Dr. Wilson is a specialist in the area of respiratory diseases. Dr. Wilson will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; 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(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Wilson 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. Wilson 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. Wilson will also testify regarding the anatomy and function of the respiratory and circulatory systems; the symptomatology, disease process and diagnosis of asbestosis and cancer of the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos fiber and the effect of exposure to substances other than asbestos in the development and manifestation of diseases of the respiratory system; the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos related diseases; the incidence of lung cancer in the general population and those individuals exposed to asbestos; cigarette smoking and its effect on the lungs; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; the lack of relationship between pleural plaques and development of any cancer; the history of evolution and knowledge of asbestos-related diseases; and the evolution of the medical community awareness of the increased risks for an asbestos-related disease in cases of prolonged exposure.

62. Patrick N. Conoley, M.D., Kelsey Seybold, West Clinic, 6624 Fannin, Ste. 1800, Houston, Texas 77030, (713) 713-442-2576.

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

63. Dr. Peter Barrett, Chief of Radiology, Quincy City Hospital, Quincy, MA 02169.

Dr. Barrett is a physician and a radiologist/B-Reader. It is impossible to set forth in precise detail the exact topics and content of the testimony of Dr. Barrett. Dr. Barrett has researched asbestos and asbestos medicine for many years.. He has opinions about his research, his studies, the development of knowledge about asbestos, and about the relationship of asbestos to disease. Dr. Barrett has specific opinions about the development of the disease, mesothelioma, and its relationship to crocidolite, amosite, and chrysotile. He will offer opinions about his research into chrysotile and where and how it might be implicated in the development of asbestosis, mesothelioma, and any lung cancer. Dr. Barrett is expected to testify about the epidemiology of asbestos related diseases and the incidence of disease in both men and women

1. the anatomy and function of the respiratory and circulatory systems, including the protective systems of the body with regards to the inhalation and retention of dust, and the diagnosis and treatment of disease affecting such systems;

2 the nature of asbestos and asbestos-related disease;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity;

4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;

5. 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 and other causes of obstructive and restrictive disease or defects of the respiratory system;

6. methods of diagnosis of various diseases with other non-asbestos-related diseases;

7. incidence of lung cancer among individuals with asbestosis or asbestos exposure as compared to non-asbestotic asbestos workers, non-asbestos exposed workers and to the general population;

8. cigarette smoking and its effects on the lungs and other organs;

9. the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic effect;

10. the difference between impairment and disability;

11. the effect of asbestosis or other asbestos-related disease, or asbestos exposure without asbestosis or other asbestos-related disease, on disability and life expectancy;

12. the lack of relationship between the presence of pleural plaques and a later development of any form of cancer;

13. the history of evolution and knowledge of asbestos-related diseases;

14. the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;

15. cancer incidence in the general population and among asbestos workers and its potential causes;

16. the incidence of mesothelioma among various kinds of workers exposed to asbestos, and the relative importance of various fiber types and the cause of mesothelioma;

17. to the extent not covered above, asbestos medicine in general.

He is expected to testify generally about medicine, asbestos, human physiology, and general topics regarding asbestos related disease. He will also testify about radiological concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis.

He is expected to testify generally about radiological concepts and evaluation and its relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays in the diagnosis of occupational pneumoconiosis. Dr. Barrett will testify that some asbestos-containing products are not hazardous and that any possible asbestos exposure from such asbestos-containing products could not have caused any of the plaintiffs' alleged illnesses.

Dr. Barrett is a practicing radiologist and a B-reader certified by NIOSH. His testimony will relate to his interpretation of chest films taken of the plaintiffs, as disclosed in reports produced, if any, and will be made available to the plaintiffs. It is anticipated that Dr. Barrett will testify generally as to his interpretation of the plaintiffs' chest films, the presence of any asbestos-related condition as evidenced on the chest film, and the presence of other abnormalities or conditions unrelated to any exposure to asbestos.

64. Arthur Langer, Ph.D., Institute of Applied Sciences, Brooklyn College of the City University, New York, New York.

Dr. Langer is a mineralogist with a Ph.D. from Columbia University. Dr. Langer is a Professor of mineralogy at City University, New York, New York, and director of the Environmental Sciences Laboratory of the Institute of Applied Sciences, Brooklyn College of the City University of New York.

Dr. Langer is expected to identify and describe the various methods by which inorganic material, from aerosols, bulk samples, or tissue, may be analyzed chemically, crystollagraphically, and structurally.

Dr. Langer is expected to testify about the various types of asbestos fibers, including Crocidolite, Amosite, Actinolite, Anthrophyllite, Tremolite, and Chrysotile, and where they fit in the mineral family. He is expected to testify about the geographic locations where the various fibers can be found. He is expected to testify about his own scientific studies about asbestos and asbestos fibers as well as studies on the subject from the literature. He is expected to testify about personal communications he has had with other

mineralogists and scientists to the extent they are admissible under the Federal Rules of Evidence or applicable state rules of evidence. He will testify about he potential biologic activity of each of the asbestos fibers in the human lung (including inorganic toxicity). He will testify specifically about the physical and chemical characteristics of the various asbestos fibers and how these characteristics influence the biological activity of each of the fibers. He will identify and characterize each of the asbestos fibers.

Dr. Langer is expected to testify as to the types of asbestos and other inorganic minerals found in the lung tissue of persons with malignant mesothelioma, asbestosis, and and lung cancer. He will testify about which of the fibers are associated with the incidence of asbestosis, lung cancer, and malignant mesothelioma in humans. Dr. Langer is expected to identify the types of fiber that have been shown to create an increased risk for asbestosis, lung cancer, and malignant mesothelioma. Dr. Langer is expected to testify as to the physical and chemical characteristics of the fibers that have been shown to create an increased risk of asbestosis, lung cancer, and malignant mesothelioma.

Dr. Langer is expected to testify about the mining and milling processes in Canada with which he has personal knowledge and personal information. He will testify about the elimination of tremolite from chrysotile asbestos in the milling process. He will testify about the presence or absence of tremolite in finished products. He is expected to testify about the paper on tremolite and chrysotile authored by Dr. Arthur Frank and Ron Dodson. He is expected to testify as to the potential for certain finished asbestos containing products to be contaminated with inorganic minerals and the amounts of the types of trace contaminants that may be found in the products. Dr. Langer is expected to offer testimony as to the amount of contaminants that are found in finished asbestos-containing products--if any--and the chemical, crystallographic, and structural composition of the contaminants. Dr. Langer is expected to testify as to the levels of airborne contaminants that can be generated from a finished product--if any.

Dr Langer is expected to testify about his own research and the research on asbestos that was done by Mt. Sinai during his work at that institution. He is expected to testify about his opinions that are also based upon his review of the literature and of evidence of exposure. He is expected to testify that exposure to certain unencapsulated and encapsulated products did not result in a release of any contaminants sufficient to cause disease in persons such as plaintiff. Dr. Langer is expected to testify that his works, and the literature, do not establish that certain encapsulated products are contaminated with tremolite asbestos.

Dr. Langer is expected to testify about human physiology as it relates to the inhalation of various asbestos fibers.

A copy of Dr. Langer's C.V. will be made available upon request

65. Dr. Victor Roggli, Assistant Professor of Pathology, Duke University Medical Center, Department of Pathology, Box 3712, Durham, NC 27710.

Dr. Roggli is a pathologist at Duke University. He will testify generally about pulmonary pathology including, but not limited to, asbestos-related diseases, tumors related to cigarette smoking, carcinomas and other related matters.

It is impossible to set forth in precise detail the exact topics and content of the testimony of Dr Roggli. Dr. Roggli has researched asbestos and asbestos medicine for many years.. He has opinions about his research, his studies, the development of knowledge about asbestos, and about the relationship of asbestos to disease. Dr. Roggli has specific opinions about the development of the disease, mesothelioma, and its relationship to crocidolite, amosite, and chrysotile. He will offer opinions about his research into chrysotile and where and how it might be implicated in the development of asbestosis, mesothelioma, and any lung cancer. Dr. Roggli is expected to testify about the epidemiology of asbestos related diseases and the incidence of disease in both men and women.

Dr. Roggli will testify generally about the evolution of asbestos disease; the pathology of asbestos-related diseases including those named as "Non-Routine"; the "state-of-the-art" of asbestos-related diseases; and, will testify about other areas of pulmonary pathology including, but not limited to, emphysema, carcinomas, and related matters.

Dr. Roggli may testify regarding the diagnosis and cause of plaintiffs' condition. He will discuss the differing physical, chemical and biological properties of various types of asbestos fibers, and will explain to the jury that chrysotile fibers are incapable of causing, or unlikely to have caused, plaintiffs' alleged condition. Dr. Roggli is expected to provide testimony in the following areas:

1. anatomy and function of the respiratory and circulatory systems and the diagnosis and treatment of disease affecting such systems;

2. the nature of asbestos and asbestosis;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, pentoneum and pentoneal cavity;

4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;

5. 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 and other causes of obstructive and restrictive disease or defects of the respiratory system;

6 methods of diagnosis of various diseases, particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases;

7. incidence of lung cancer among individuals with asbestosis or asbestos exposure without asbestosis, compared with non-asbestotic asbestos workers, non-asbestos exposed workers, and with the general population;

8. the import of any exhibit (including without limitation, corporate documents of defendants) introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;

9. cigarette smoking and its effect on the lung and other organs;

10 the relative danger of these defendants' asbestos-containing products;

11. the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect;

12. difference between impairment and disability;

13. effect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;

14 effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

Dr. Roggli is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies.

66. Mr. Lawrence R. Birkner, McIntyre, Birkner & Associates, Inc., 2026 El Monte Drive, Thousand Oaks, California 91362-1822.

Birkner is a certified Industrial Hygienist trained in the measurement of dusts and related matters. He is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. He may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. He may testify regarding threshold limit values and permissible exposure levels as promulgated by private

organizations and governmental agencies. He may testify as to issues involving reentrainment and fiber drift. He may testify as to work practices regarding various types of Larry occupations using products that contained asbestos. He may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. He may testify as to exposure that may result from the use of other types of asbestos products.

Mr. Birkner has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skills, and training. Mr. Birkner may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. He may testify generally as to the industrial hygiene state-of-the-art. He may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. He may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. He may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity that could have substantially contributed to the plaintiff's alleged asbestos-related condition. He may testify about applicable governmental standards and regulations. He may also testify as to any matter raised by experts called by the plaintiff or any co-defendants. Birkner may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Birkner may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Birkner may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Mr Birkner will discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

Mr. Birkner may create an exposure evaluation in this case. He may create a retrospective exposure assessment for the plaintiff in this case, for any of the products, for a co-worker, or for a job site. He may create an exposure assessment using another method. In creating the exposure analysis, Mr. Birkner may rely upon scientific and industrial articles and papers which reveal the various exposure for various products in various settings. In doing his assessment, he may rely upon the plaintiff's testimony, the testimony of co-workers and family members, and personal visits he has made to the same or similar sites, photographs which reveal relevant information, summaries or affidavits, actual dust counts from the same or similar activities, answers to

interrogatories, from this and other cases which reveal relevant facts, including the fiber content and fiber type of various products, and information revealed through conversations with other industrial hygienists and scientists which are of a kind which industrial hygienists usually rely upon.

Mr. Birkner will testify that he has examined documents from Johns Manville and other manufacturers of asbestos products. He has reached the conclusion that Johns Manville was clearly one of the world's leader in the production of raw fiber asbestos and the production of asbestos-containing products. He has also reached the conclusion that John's Manville was clearly the North American leader when it came to the use of asbestos in products which were going to be offered for sale to purchasers in the United States. He will testify that in the 1930's. Johns Manville's role within the asbestos industry towered above the roles of any other company. Johns Manville mined, milled and sold raw asbestos fibers. This fiber was also used in many of Johns Manville's own asbestos containing products. US Gypsum never mined or milled or sold any raw asbestos.

Mr. Birkner believes that "state of the art documents and articles" shows that Johns Manville was involved with and contributed to several scientific research studies in the 1930's at the Saranac Laboratories. Mr. Birkner believes that the Saranac Laboratory had been a tuberculosis institute during the 1930's, and that it was noted for its scientific research. In particular, Dr. Gardner, the Saranac director, was an imminent dust researcher.

With respect to one of the studies of asbestosis. Mr. Birkner believes that once the research was commenced, US Gypsum was approached by Johns Manville and the other original sponsors to further spread the cost of the research study of asbestosis in the 1930's. He will testify that US Gypsum signed on for the total contribution of $750.00, paid out at $250.00/yr over three years. He will also testify that "state of the art" documents clearly show that Johns Manville had a very close relationship to Raybestos Manhatt: 1. an these two compani:s closely followed the progress of this asbestosis study.

Mr. Birkner will testify that the research that US Gypsum agreed to support was very narrow in scope and sought specific answers to specific questions. He will testify that the research immediately got off schedule and stayed off schedule for the entire length of the project He will testify that WWII interrupted the research which had been begun at Saranac, and that the research continued to be behind schedule.

Mr. Birkner will testify that as this country developed more industrial needs and additional manufacturing capability, the nation needed an increased need for the generation of electricity. Mr. Birkner will testify that it was necessary to build power plants for the production of that energy, and that it was necessary to build chemical and petro-chemical facilities, all of which required asbestos insulation. Mr. Birkner has examined catalogues, documents, and other papers, which show that Johns Manville and

other companies (not US Gypsum) were the principal suppliers of asbestos insulation and were the chief beneficiaries of the increased work in this area.

Mr. Birkner will testify that "state of the art" documents show that the sales of pipe insulation, block, and cement skyrocketed through the late 1930's. He will testify that in 1941, when the war started, the United States Government required the use of asbestos-containing insulation in the construction of ships for manufacture of war. This construction would have required use of asbestos-containing insulation products and resulted in 100,000 shipyard workers being exposed to this product. He will testify that the "state of the art" documents show that during the construction of ships, the principal asbestos products which were used were asbestos containing pipe covering block and cements manufactured by Johns Manville and the others mentioned in this statement. Based upon review of company documents US Gypsum products were not appropriate for use on ships and were never intended to be uses in ship construction or repair. In contrast Johns Manville made a number of high temperature insulation products that would have been used in ship construct and repair. He will testify that US Gypsum joint compound was not the kind of product which insulators or boilermen would use in their work. He will testify that Johns Manville, and the other asbestos containing thermal insulation manufacturers, were the largest in market share and dominated the US market for use of asbestos.

Mr. Birkner will testify about the whole Saranac history and documents, the National Cancer Institute, and the development of writings about lung cancer as it relates to asbestos exposure. He will testify that from "state of the art documents" lung cancer was a rare disease in the 30's and 40's and distinguish it from the notoriety of today. He will testify that any protection from cancer was little known to industrial hygienists in the 40's and 50's and was based upon knowledge of protection of workers for asbestosis. He will testify that the Doll Study in 1955 on cigarette smoking and also on asbestos was a significant but not final development in the evolution of information about the causes of cancer. He will testify that in later 1959, some Union officials approached Doctor Selikoff because they (the Union officials) (and their workers) were in a unique position to see that for some reason the insulation workers were having an increased amount of disease. He will testify that because of the data available on the workers from the Union, Selikoff began to study the workers in the insulator's union. He will testify that in 1963, he developed initial information that indicated that insulation workers were at a higher risk of death from job site asbestos exposure. The witness will testify that the first people Selikoff reported this information to were the insulation workers and their unions, and that this information was reported to them prior to publication in National medical journals. He will testify that the Asbestos Worker Magazine, a magazine that was directed to all union asbestos insulators, carried the information that the workers who worked with asbestos insulation were subject to disease. He will testify that based on this information, the 1964 Conference was organized.

Mr Birkner will testify that thermal insulation was the focus of all the medical and scientific concern and not joint compound

67. Gayla McCluskey, Six Hartford Lane, Suite 106, Radnor, PA 19087

Gayla McCluskey is a certified Industrial Hygienist trained in the measurement of dusts and related matters. She is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. She is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. She may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. She may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. She may testify as to issues involving reentrainment and fiber drift. She may testify as to work practices regarding various types of occupations using products that contained asbestos. She may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. She may testify as to exposure that may result from the use of other types of asbestos products.

Ms. McCluskey has personal knowledge of relevant facts but is also an expert based upon her specialized knowledge, skills, and training. Ms. McCluskey may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. She may testify about the nature of the working environment in such locations. She may testify about her knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. She may testify generally as to the industrial hygiene state-of-the-art. She may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. She may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. She may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. She may testify about applicable governmental standards and regulations. She may also testify as to any matter raised by experts called by the plaintiff or any co-defendants.

Ms. McCluskey may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Ms. McCluskey may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Ms. McCluskey may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure

Ms. McCluskey may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. She may also testify about the importance of the development of warnings ideas as they relate to asbestos.

Ms. McCluskey may offer testimony about each of the products at issue in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

Ms. McCluskey may also testify about the steel plants and the use of various products at those plants.

Ms. McCluskey will testify about Johns Manville, Owens Corning Kaylo, and Pittsburgh Corning.

68. Any prior deposition or trial testimony of any witness called by any other party either live or by deposition.

69. Any prior deposition or trial testimony of any physician who has treated, examined, or been consulted regarding the Plaintiff.

70. Any deposition or custodian of records concerning the Plaintiff.

71. Any deposition taken by any party in this case and the depositions listed in Defendants' Designation of Deposition Testimony.

72. All physicians who have seen, examined, or treated, Plaintiff and/or autopsied Plaintiff's decedent.

73. Defendants reserve the right to use any affidavit, deposition, answer to interrogatories, and/or answers to requests for admissions made by any party to this action.

74. Defendants reserve the right to call any witness who may be necessary for rebuttal testimony.

75. All other expert and factual witnesses designated or listed by plaintiffs and defendants in this lawsuit.

Ms McCluskey may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. She may also testify about the importance of the development of warnings ideas as they relate to asbestos.

Ms. McCluskey may offer testimony about each of the products at issue in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

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71. Any deposition taken by any party in this case and the depositions listed in Defendants' Designation of Deposition Testimony.

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65. Dr. Victor Roggli, Assistant Professor of Pathology, Duke University Medical Center, Department of Pathology, Box 3712, Durham, NC 27710

Dr. Roggli is a pathologist at Duke University. He will testify generally about pulmonary pathology including, but not limited to, asbestos-related diseases, tumors related to cigarette smoking, carcinomas and other related matters.

It is impossible to set forth in precise detail the exact topics and content of the testimony of Dr. Roggli. Dr. Roggli has researched asbestos and asbestos medicine for many years. He has opinions about his research, his studies, the development of knowledge about asbestos, and about the relationship of asbestos to disease. Dr. Roggli has specific opinions about the development of the disease, mesothelioma, and its relationship to crocidolite, amosite, and chrysotile. He will offer opinions about his research into chrysotile and where and how it might be implicated in the development of asbestosis, mesothelioma, and any lung cancer. Dr. Roggli is expected to testify about the epidemiology of asbestos related diseases and the incidence of disease in both men and women.

Dr. Roggli will testify generally about the evolution of asbestos disease; the pathology of asbestos-related diseases including those named as "Non-Routine"; the "state-of-the-art" of asbestos-related diseases; and, will testify about other areas of pulmonary pathology including, but not limited to, emphysema, carcinomas, and related matters.

Dr. Roggli may testify regarding the diagnosis and cause of plaintiffs' condition. He will discuss the differing physical, chemical and biological properties of various types of asbestos fibers, and will explain to the jury that chrysotile fibers are incapable of causing, or unlikely to have caused, plaintiffs' alleged condition. Dr. Roggli is expected to provide testimony in the following areas:

1. anatomy and function of the respiratory and circulatory systems and the diagnosis and treatment of disease affecting such systems;

2. the nature of asbestos and asbestosis;

3. the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, pentoneum and pentoneal cavity;

4. the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure;

5. 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 and other causes of obstructive and restrictive disease or defects of the respiratory system;

6. methods of diagnosis of various diseases, particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases;

7. incidence of lung cancer among individuals with asbestosis or asbestos exposure without asbestosis, compared with non-asbestotic asbestos workers, non-asbestos exposed workers, and with the general population.

8. the import of any exhibit (including without limitation, corporate documents of defendants) introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witness;

9. cigarette smoking and its effect on the lung and other organs;

10. the relative danger of these defendants' asbestos-containing products;

11. the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect;

12. difference between impairment and disability;

13. effect of asbestosis, or asbestos exposure without asbestos, on disability and life expectancy;

14. effect of pleural plaques or other pleural manifestations of asbestos exposure on lung function or life expectancy.

Dr. Roggli is expected to testify about chrysotile asbestos, amosite asbestos, and fiber burden studies.

66. Mr. Lawrence R. Birkner, McIntyre, Birkner & Associates, Inc., 2026 El Monte Drive, Thousand Oaks, California 91362-1822.

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Mr. Birkner will discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. He will also testify about the importance of the development of warnings ideas as they relate to asbestos.

Mr. Birkner may create an exposure evaluation in this case. He may create a retrospective exposure assessment for the plaintiff in this case, for any of the products, for a co-worker, or for a job site. He may create an exposure assessment using another method. In creating the exposure analysis, Mr. Birkner may rely upon scientific and industrial articles and papers which reveal the various exposure for various products in various settings. In doing his assessment, he may rely upon the plaintiff's testimony, the testimony of co-workers and family members, and personal visits he has made to the same or similar sites, photographs which reveal relevant information, summaries or affidavits, actual dust counts from the same or similar activities, answers to

interrogatories, from this and other cases which reveal relevant facts, including the fiber content and fiber type of various products, and information revealed through conversations with other industrial hygienists and scientists which are of a kind which industrial hygienists usually rely upon.

Mr. Birkner will testify that he has examined documents from Johns Manville and other manufacturers of asbestos products. He has reached the conclusion that Johns Manville was clearly one of the world's leader in the production of raw fiber asbestos and the production of asbestos-containing products. He has also reached the conclusion that John's Manville was clearly the North American leader when it came to the use of asbestos in products which were going to be offered for sale to purchasers in the United States. He will testify that in the 1930's. Johns Manville's role within the asbestos industry towered above the roles of any other company. Johns Manville mined, milled and sold raw asbestos fibers. This fiber was also used in many of Johns Manville's own asbestos containing products. US Gypsum never mined or milled or sold any raw asbestos.

Mr. Birkner believes that "state of the art documents and articles" shows that Johns Manville was involved with and contributed to several scientific research studies in the 1930's at the Saranac Laboratories. Mr. Birkner believes that the Saranac Laboratory had been a tuberculosis institute during the 1930's, and that it was noted for its scientific research. In particular, Dr. Gardner, the Saranac director, was an imminent dust researcher.

With respect to one of the studies of asbestosis, Mr. Birkner believes that once the research was commenced, US Gypsum was approached by Johns Manville and the other original sponsors to further spread the cost of the research study of asbestosis in the 1930's. He will testify that US Gypsum signed on for the total contribution of $750.00, paid out at $250.00/yr over three years. He will also testify that "state of the art" documents clearly show that Johns Manville had a very close relationship to Raybestos Manhattan, an these two companies closely followed the progress of this asbestosis study.

Mr. Birkner will testify that the research that US Gypsum agreed to support was very narrow in scope and sought specific answers to specific questions. He will testify that the research immediately got off schedule and stayed off schedule for the entire length of the project. He will testify that WWII interrupted the research which had been begun at Saranac, and that the research continued to be behind schedule.

Mr. Birkner will testify that as this country developed more industrial needs and additional manufacturing capability, the nation needed an increased need for the generation of electricity. Mr. Birkner will testify that it was necessary to build power plants for the production of that energy, and that it was necessary to build chemical and petro-chemical facilities, all of which required asbestos insulation. Mr. Birkner has examined catalogues, documents, and other papers, which show that Johns Manville and

other companies (not US Gypsum) were the principal suppliers of asbestos insulation and were the chief beneficiaries of the increased work in this area.

Mr. Birkner will testify that "state of the art" documents show that the sales of pipe insulation, block, and cement skyrocketed through the late 1930's. He will testify that in 1941, when the war started, the United States Government required the use of asbestos-containing insulation in the construction of ships for manufacture of war. This construction would have required use of asbestos-containing insulation products and resulted in 100,000 shipyard workers being exposed to this product. He will testify that the "state of the art" documents show that during the construction of ships, the principal asbestos products which were used were asbestos containing pipe covering block and cements manufactured by Johns Manville and the others mentioned in this statement. Based upon review of company documents US Gypsum products were not appropriate for use on ships and were never intended to be uses in ship construction or repair. In contrast Johns Manville made a number of high temperature insulation products that would have been used in ship construct and repair. He will testify that US Gypsum joint compound was not the kind of product which insulators or boilermen would use in their work. He will testify that Johns Manville, and the other asbestos containing thermal insulation manufacturers, were the largest in market share and dominated the US market for use of asbestos.

Mr. Birkner will testify about the whole Saranac history and documents, the National Cancer Institute, and the development of writings about lung cancer as it relates to asbestos exposure. He will testify that from "state of the art documents" lung cancer was a rare disease in the 30's and 40's and distinguish it from the notoriety of today. He will testify that any protection from cancer was little known to industrial hygienists in the 40's and 50's and was based upon knowledge of protection of workers for asbestosis. He will testify that the Doll Study in 1955 on cigarette smoking and also on asbestos was a significant but not final development in the evolution of information about the causes of cancer. He will testify that in later 1959, some Union officials approached Doctor Selikoff because they (the Union officials) (and their workers) were in a unique position to see that for some reason the insulation workers were having an increased amount of disease. He will testify that because of the data available on the workers from the Union, Selikoff began to study the workers in the insulator's union. He will testify that in 1963, he developed initial information that indicated that insulation workers were at a higher risk of death from job site asbestos exposure. The witness will testify that the first people Selikoff reported this information to were the insulation workers and their unions, and that this information was reported to them prior to publication in National medical journals. He will testify that the Asbestos Worker Magazine, a magazine that was directed to all union asbestos insulators, carried the information that the workers who worked with asbestos insulation were subject to disease. He will testify that based on this information, the 1964 Conference was organized.

Mr. Birkner will testify that thermal insulation was the focus of all the medical and scientific concern and not joint compound.

67. Gayla McCluskey, Six Hartford Lane, Suite 106, Radnor, PA 19087

Gayla McCluskey is a certified Industrial Hygienist trained in the measurement of dusts and related matters. She is prepared to testify regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. She is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. She may give testimony regarding the level of fiber release, if any, from gasket and packing products in the occupational setting. She may testify regarding threshold limit values and permissible exposure levels as promulgated by private organizations and governmental agencies. She may testify as to issues involving reentrainment and fiber drift. She may testify as to work practices regarding various types of occupations using products that contained asbestos. She may testify as to the applicability of the OSHA and Environmental Protection Agency's guidelines as they relate to various types of products including gaskets and packings. She may testify as to exposure that may result from the use of other types of asbestos products.

Ms. McCluskey has personal knowledge of relevant facts but is also an expert based upon her specialized knowledge, skills, and training. Ms. McCluskey may testify about the size, construction, layout and working environment of facilities such as where the plaintiffs worked. She may testify about the nature of the working environment in such locations. She may testify about her knowledge of the composition and asbestos content, if any, of the products and may testify concerning the ability of such products to emit asbestos fiber under certain conditions. She may testify generally as to the industrial hygiene state-of-the-art. She may testify to the dust levels produced by particular insulation operations and products, including pipe and block insulation. She may also address insulator union knowledge of asbestos hazards, the historical development of the use of respirators in association with the use of asbestos-containing products. She may testify about whether the some products identified are capable of emitting respirable asbestos fibers of type or quantity which could have substantially contributed to the plaintiff's alleged asbestos-related condition. She may testify about applicable governmental standards and regulations. She may also testify as to any matter raised by experts called by the plaintiff or any co-defendants.

Ms. McCluskey may testify regarding an individual's risks or exposure to asbestos from different media, including, but not limited to, ambient air, industrial products and occupational settings. Ms. McCluskey may testify concerning: (1) circumstances in occupational settings that may result in direct exposure for persons having contact with asbestos-containing products or equipment with asbestos insulation, and (2) circumstances that may result in bystander exposure for those nearby others having contact with asbestos containing products or equipment with asbestos insulation. Ms. McCluskey may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure.

Ms. McCluskey may discuss the development of warnings through society and the development of attitudes about what should be stated in warnings. She may also testify about the importance of the development of warnings ideas as they relate to asbestos.

Ms. McCluskey may offer testimony about each of the products at issue in these cases and whether the product would or would not cause asbestos disease from the standpoint of an industrial hygienist.

Ms. McCluskey may also testify about the steel plants and the use of various products at those plants.

Ms. McCluskey will testify about Johns Manville, Owens Corning Kaylo, and Pittsburgh Corning.

68. Any prior deposition or trial testimony of any witness called by any other party either live or by deposition.

69. Any prior deposition or trial testimony of any physician who has treated, examined, or been consulted regarding the Plaintiff.

70. Any deposition or custodian of records concerning the Plaintiff.

71. Any deposition taken by any party in this case and the depositions listed in Defendants' Designation of Deposition Testimony.

72. All physicians who have seen, examined, or treated, Plaintiff and/or autopsied Plaintiff's decedent.

73. Defendants reserve the right to use any affidavit, deposition, answer to interrogatories, and/or answers to requests for admissions made by any party to this action.

74. Defendants reserve the right to call any witness who may be necessary for rebuttal testimony.

75. All other expert and factual witnesses designated or listed by plaintiffs and defendants in this lawsuit.