

OCT. 30. 99* 20202

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
98-CVS-9679

GARY ROBERT ALBRIGHT, et al.

Plaintiffs,

v.

HNA HOLDINGS, INC., also known as
TREVIRA, INC. formerly HOECHST
CELANESE, INC. and FIBER
INDUSTRIES, INC.,

Defendants.

PLAINTIFF'S EXHIBIT

CEL-1374

**THE DEFENDANT'S RESPONSES
TO THE PLAINTIFF'S COURT
ORDERED INTERROGATORIES
DIRECTED TO DANIEL THOMAS**

Pursuant to Rules 26 and 33 of the North Carolina Rules of Civil Procedure, the defendant HNA Holdings, Inc. responds to the plaintiff's court ordered interrogatories directed to Daniel Thomas as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Please state your full name, current home address and current work address.

ANSWER: Dr. Daniel J. Thomas
Hoechst Marion Roussel Corporation
Box 6800
Route 202-206
Bridgewater, New Jersey 08807

INTERROGATORY NO. 2: Please provide the name(s) of your employer(s) since 1965.

ANSWER: 1965 - 1984 - United States Government; Department of the Navy;
1984 - 1988 - Celanese Specialty Operations;
1988 - 1997 - Hoechst Celanese Corporation;
1998 - present - Hoechst Marion Roussel Corporation

INTERROGATORY NO. 3: For each employer above, provide the:

- (a) Name of your title, position with said employer;
- (b) The date(s) you occupied/held such position and/or title;
- (c) The plant(s) where you worked; and
- (d) The plant(s) which you oversaw, supervised or were part of your job responsibility.

ANSWER: 1965 - 1984 - Research medical officer for the Department of the Navy;
1984 - 1988 - Medical director for Celanese Specialty Operations;
1988 - 1997 - Medical director for Hoechst Celanese Corporation;
1998 - present - Vice President of Occupational Health for Hoechst Marion Roussel Corporation

Dr. Thomas never worked in any plant and never had functional responsibility for overseeing or supervising issues in any plant.

INTERROGATORY NO. 4: For each title/position stated above, provide a brief but inclusive description of your job responsibilities.

ANSWER: In his position with the Department of the Navy, Dr. Thomas was responsible for human research in the Naval Biodynamics Laboratory.

The positions of medical director for Celanese Specialty Operations and for Hoechst Celanese Corporation involved policy decisions on medical issues for the corporation, and included conducting or overseeing audits on medical issues at various corporate facilities. Dr. Thomas has no record or recollection of ever doing an audit concerning asbestos-related issues at the Salisbury facility.

As Vice President of Occupational Health for Hoechst Marion Roussel Corporation, Dr. Thomas is responsible for global policy and program development on occupational health issues for the corporation.

INTERROGATORY NO. 5: Did your job titles or positions entail or encompass in any way the Salisbury fiber plant, including but not limited to:

- (a) The purchase of materials, construction and/or construction;
- (b) Supervision of the plant;
- (c) The health, safety and welfare of any plant worker;
- (d) The drafting, implementation or dissemination of any corporate policy, bylaw or rule affecting said plant of any plant worker.

ANSWER:

- (a) No.
- (b) No.
- (c) No.

(d) Yes, to the extent that Hoechst Celanese Corporation medical policy at the corporate level affected the Salisbury plant.

INTERROGATORY NO. 6: Please outline your education background, including any degrees obtained and/or any licensing, certification and official titles held or obtained.

ANSWER:

1. Massachusetts Institute of Technology, Bachelor of Science in Physics - 1959
2. Jefferson Medical College, Medical Doctor - 1963
3. Harvard School of Public Health, Master of Public Health - 1969
4. Board certified in Aerospace medicine

INTERROGATORY NO. 7: When were you first made aware of any hazards to human health associated with exposure to asbestos-containing materials.

ANSWER: Dr. Thomas was first made aware of hazards to human health associated with exposure to asbestos-containing materials while in medical school, sometime between the years of 1959 and 1963.

INTERROGATORY NO. 8: In regards to your answer above, identify the source of said communication or information and the manner in which you received it.

ANSWER: Medical school curriculum.

- **INTERROGATORY NO. 9:** Please identify the name(s), current and last known address, title and/or position of the person with the most knowledge concerning worker health and safety issues at the Salisbury fiber plant in:

- (a) 1965
- (b) 1975
- (c) 1985
- (d) 1995

ANSWER: Dr. Thomas has no record or recollection of the names of individuals with the most knowledge concerning worker health and safety issues at the Salisbury fiber plant at any time. He knows generally that in 1985 and 1995, the person in the position of Manager of Environment, Safety, and Health Administration at the Salisbury plant would have knowledge concerning worker health and safety issues at that plant.

INTERROGATORY NO. 10: Please identify the person(s) with the most knowledge concerning the corporate defendant knowledge, policies and/or procedures involving actual or potential hazards associated with asbestos-containing materials at any corporate location or plant in:

- (a) 1965
- (b) 1975
- (c) 1985
- (d) 1995

ANSWER: The defendant objects to Interrogatory Number 10 on the grounds that it is overly broad, unduly burdensome, and seeks the discovery of information that is not reasonably calculated to lead to the discovery of relevant, admissible evidence. Subject to and without waiving the foregoing objections, the defendant responds to Interrogatory Number 10 as follows:

Dr. Thomas has no record or recollection of the name of any individual with the most knowledge concerning the hazards of asbestos-containing materials at the Salisbury plant, other than general knowledge that individuals in the Environment, Safety and Health Administration Department at the Salisbury plant in 1985 and 1995 would have knowledge concerning those issues, as would individuals in the Environment, Safety, and Health Administration Department in the

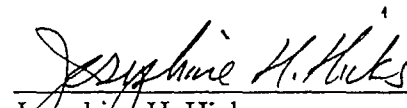
Fibers Group located in Charlotte, North Carolina and at the corporate level in New York or in New Jersey.

INTERROGATORY NO. 11: Please identify the person(s) in charge of, or with primary responsibility to oversee worker health and safety at the Salisbury fiber plant from:

- (a) 1965-1975
- (b) 1975-1985
- (c) 1985-1995
- (d) 1995-present

ANSWER: The defendant reasserts and incorporates herein by reference its response to Interrogatory Number 9.

This 25th day of February, 1999.



Josephine H. Hicks
Attorney for Defendant
HNA Holdings, Inc.

OF COUNSEL:

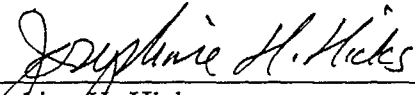
PARKER, POE, ADAMS & BERNSTEIN L.L.P.
2500 Charlotte Plaza
Charlotte, N.C. 28244
(704)372-9000

CERTIFICATE OF SERVICE

This is to certify that on this date I served the foregoing by depositing a copy thereof in the United States mail, postage prepaid, and addressed as follows:

Christopher D. Mauriello, Esq.
Wallace and Graham, P.A.
525 North Main Street
Salisbury, NC 28144

This 25th day of February, 1999.



Josephine H. Hicks

OF COUNSEL:

PARKER, POE, ADAMS & BERNSTEIN L.L.P.
2500 Charlotte Plaza
Charlotte, N.C. 28244
(704)372-9000