

FILE NAME: GATX (GX)

DATE: 1998

DOC#: GX003

**DOCUMENT DESCRIPTION: Legal - Plaintiff's Second Supplemental
Answers to Defendant GATX's Interrogatories**

IN THE COURT OF COMMON PLEAS

TRUMBULL COUNTY, OHIO

LOIS J. MISSIK,	)	Case No. 97-CV-303
	)	
<i>Plaintiff,</i>	)	
	)	Judge Kontos
v.	)	
	)	
OWENS-CORNING FIBERGLAS CORP.,	)	
<i>et al.</i>	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF'S SECOND SUPPLEMENTAL ANSWERS TO
DEFENDANT GATX'S INTERROGATORIES**

COMES NOW plaintiff, Lois J. Missik, pursuant to the Rules of this Court, and provides the following supplemental responses to interrogatories served upon her by defendant General American Transportation Corporation ("GATX"). These responses have been made with the assistance of counsel. Therefore, the word usage and sentence structure may be that of my lawyers and do not purport to be the exact language I would use.

23. State the name and address of each person whom you expect to call as an expert witness in the trial of this action, together with the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which such expert is expected to testify, and a summary of the grounds for each opinion.

ANSWER: My lawyers have not decided whom they may use as expert witnesses at trial.

SUPPLEMENTAL ANSWER: : It is anticipated that the following expert witnesses will testify on my behalf at trial:



Gerrit W. H. Schepers, M.D., Sc.D.
6527 Sunny Hill Court
McLean, VA 22101

Doctor Schepers is a physician and Director of the Institute of Industrial and Forensic Medicine. Doctor Schepers is expected to testify that, to a reasonable degree of medical certainty, Mike Missik died from a malignant asbestos-caused pleural mesothelioma. Additionally, Dr. Schepers is expected to testify that Mike Missik had asbestosis. Doctor Schepers' opinions concerning Mr. Missik are set out more fully in his reports of October 23, 1997, and April 30, 1998, that are being produced this date in response to GATX's requests for production of documents.

In addition to the foregoing opinions arrived at for the purpose of this litigation, Dr. Schepers is expected to testify as to widely known facts concerning the health hazards associated with exposure to asbestos and to dust containing asbestos particles. Furthermore, Dr. Schepers is expected to testify concerning the availability of information about such hazards.

Barry I. Castleman, Sc.D.
2412 Pickwick Road
Baltimore, MD 21207.

Doctor Castleman is an Environmental Consultant and the author of Asbestos: Medical and Legal Aspects (4th ed. 1996). Doctor Castleman is expected to testify that there were numerous articles published about asbestos, asbestosis, lung cancer, and mesothelioma in persons exposed to asbestos and asbestos products before 1961. Doctor Castleman is also expected to testify that, from a public health standpoint, by the late 1930's, it was known from the published and widely available medical and scientific

literature that persons exposed to dust released from asbestos-containing products were at risk for developing lung disease.

Lois Missik

COUNTY OF _____
STATE OF _____

I HEREBY CERTIFY THAT on this _____ day of June 1998, before me, a Notary Public, in and for _____, Lois Missik personally appeared before me and made oath in due form of law that the matters and facts set forth above are true to the best of her knowledge and belief.

NOTARY PUBLIC

My commission expires: _____

Respectfully,

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