

A Certified Shorthand Reporter from the firm of Charlotte Smith Reporting will report the depositions. The Court Reporter is hereby requested to issue and serve a subpoena for the production of said witness and documents at his address, to-wit: 10 Quail Trail, Hendersonville, North Carolina 28792. The deponent is hereby requested to bring the following documents to his deposition.

- (1) Curriculum Vitae;
- (2) Documents relating to proposed or conducted studies of occupational disease in chemical plant, construction, or refinery workers.
- (3) Documents relating to toxicological reviews or testing (excluding underlying data);
- (4) Documents relating to studies concerning occupational pneumoconioses and occupational carcinogens and tumors, including epidemiology studies, mortality studies, and morbidity studies;
- (5) Documents relating to occupational health or safety practices or standards;
- (6) Documents reflecting meetings activities or communiques of any persons concerned with worker health of safety, acting on their employer's behalf or under the auspices of any of the following groups or organizations:

ACGIH, Air Hygiene Association, American Petroleum Institute, ANSI (formerly American Standards Association), Chemical manufacturer's Association or Manufacturing Chemists Association, Industrial Hygiene Foundation, Louisiana Chemical Counsel, National Petroleum Refiners Association, National Safety Counsel, Texas Chemical Counsels; and

- (6) Industrial hygiene and occupational medicine texts, articles, or treatises published before 1965.

"DOCUMENT" means all writings of any kind, including written, recorded or graphic matter, however produced or reproduced. It includes all matter that relates or refers in whole or in part to the subjects of these interrogatories or production requests or requests for admission. If the document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reason of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each nonidentical copy is a separate "document". "FORM DOCUMENTS" means a document prepared as a matter of repetitive routine under a procedure (such as the use of printed blank forms) which eliminates the necessity of repeated production or reproduction of information that remains the same in the whole series of form documents. The term "DOCUMENT" includes, without limitation, correspondence, personal and interoffice memoranda, notes, diaries, statistics, letters, telexes, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and intraoffice communications, offers, notations or memoranda or any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, invoices, recordings, worksheets, work papers, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing.

You are invited to attend and cross-examine.