

CAUSE NO. 90G2055

WELDON R. MOAKE and JANICE I. MOAKE; KEVIN R. MOAKE; DANA R. ASHLEY; and, MACK K, MOAKE	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
VS.	§	BRAZORIA COUNTY, TEXAS
OWENS – CORNING FIBERGLAS CORPORATION, ET AL.	§	
Defendants.	§	239TH JUDICIAL DISTRICT

DEFENDANT UNION CARBIDE CORPORATION d/b/a UNION CARBIDE CHEMICALS AND PLASTICS, INC.'S LIST OF POTENTIAL FACT/EXPERT WITNESSES AND DEPOSITION TESTIMONY

Defendant Union Carbide Corporation d/b/a Union Carbide Chemicals and Plastics, Inc.'s List of Potential Fact/Expert Witnesses and Deposition Testimony to the above referenced cases.

UNION CARBIDE CORPORATION'S LIST OF POTENTIAL FACT/EXPERT WITNESSES

1. Dr. Peter Barrett (Physician)
10 Martins Lane
Hingham, MA 02043
(617) 749-5876

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

2. Dr. Eric Chatfield (Miscroscopist/Hygienist)
Chatfield Technical Consultants
2071 Dickson Road
Missisangua, Ontario
Canada LSB 1YB
(905) 896-9290 (Phone)
(905) 896-1930 (Fax)

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

3. Dr. Allen Gibbs (Pathologist)
Pathology Department
Landough Department
Landough Hospital
Penarth, Glamorgan
UK CFC I XX
011-44-1222711711
011-44-1633259189 (Home)

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

4. Dr. Duane Hyde (Physician)
319 Canal Street
King City, CA 93930
(408) 385-5170

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

5. Dr. Ed Ilgren (Pathologist)
830 Montgomery Avenue - Apt. 503
Bryn Mawr, PA 19010
(610) 525-5960

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

6. Dr. Hilton Lewinsohn (Physician)
Center for Occupational
& Environmental Health
108 High Street/P.O. Box 1050
Exeter, N-H 03833
(603) 778-6510

Home Address:
20 Chestnut Street, N-27
Exeter, NE 03833
(603) 778-2797 (home)

Dr. Lewinsohn is a Former Assistant Corporate Medical Director and is knowledgeable about and can testify on medical issues in relation to asbestos generally.

7. Professor Fred A. Mumpton (Geologist)
31 Sherwood Drive
Lewiston, New York 14902
(716.) 754-3248

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

8. Professor Fred Pooley (Mineralogist)
School of Engineering
Department of Mining & Metals
University of Wales
P.O. Box 917
Cardiff, Wales CF21XH
011-44-1222 874-0000

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

10. Dr. Harrison Rhodes (Industrial Hygienist)
1037 Lakeside Court
Grand Junction, CO 81506
(970) 242-4932

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

11. Dr. Robert Sawyer (Physician)
Entek Environmental &
Technical Services, Inc.
Rensselaer Technology Park
125 Defreest Drive
Troy, NY 12180
(518) 283-9200
(800) 278-6433

Dr. Robert Sawyer
Home Address:
P.O. Box 1407
Guilford, CT 06437
(203) 453-3060

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

12. Dr. Mark Van Baalen (Mineralogist)
Harvard University
Cambridge, MA
(617) 495-0705

Witness will be able to testify about either the physical properties of Calidria, such as its short fiber length, lack of tremolite or other contamination and other unique properties, or the lack of health hazards from exposure to Calidria, or both.

13. Carl Demehl - Former Industrial Hygienist, deceased (by deposition)

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

14. Dr. Robert Plevan - Industrial Hygienist, Union Carbide Corporation, 39 Old Ridgebury Road, Danbury, CT. 06817 (203) 794-2000

Current UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

15. Newt Ketchum - Address unavailable

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

16. Newell Bolton - Hilton Head, South Carolina

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

17. Roy Joyner, M.D. - Address unavailable

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

18. Don Deese - Address unavailable

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

19. Dick LaCour, c/o Union Carbide Corporation, 3301 5th Avenue South, Texas City, Texas 77590, (409) 945-7411

Current UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

20. Charlie Phinney, c/o Union Carbide Corporation, 3301 5th Avenue South, Texas City, Texas 77590, (409) 945-7411

Former UCC employee who may have information regarding the general history of the Texas City plant, current and past industrial hygiene practices, medical programs and safety procedures pertaining to asbestos.

21. Earl Vicnair, c/o Union Carbide Corporation, 3301 5th Avenue South, Texas City, Texas 77590, (409) 945-7411

Current employee of UCC's Maintenance Department who may have knowledge of current and past safety practices with respect to past usage of asbestos-containing materials.

UNION CARBIDE POTENTIAL
FACT/EXPERT WITNESSES AND DEPOSITION TESTIMONY

Carlos Martino, Research Scientist - employed by Union Carbide at Bound Brook, New Jersey.

Douglas Neal, retired Industrial Hygienist - formerly employed at Union Carbide In Bound Brook, New Jersey.

> Mr. Martino and Mr. Neal are familiar with the Bakelite resin manufacturing process and can testify as to why the resin could not emit or let loose asbestos fiber.

Don Gould, former Chair, Union Carbide's Labeling Committee - employed by Union Carbide, Bound Brook, New Jersey.

> Mr. Gould can testify about considerations and processes that went into the labels used on the Bakelite resin product.

Dr. Hilton Lewinson (MD)
Hartford, CT

Dr. Ed Ilgren, (Mineralogist)
Bryn Mawyr, PA

Dr. Mark Van Baalen (Mineralogist)
Harvard University
Cambridge, MA

Dr. Allen Gibbs
Pathology Department
Landough Hospital
Penarth, Glamorgan
UK CFC I XX

Professor Fred Pooley (Mineralogist)
School of Engineering
Dept. of Mining & Minerals
University of Wales
P. O. Box 917
Cardiff, Wales CF21XH

John L. Myers