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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.

**THE DEFENDANT'S RESPONSES
TO THE PLAINTIFF'S COURT
ORDERED INTERROGATORIES
DIRECTED TO JONATHAN AMSEL**

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 Jonathan Amsel as follows:

INTERROGATORIES

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

ANSWER: Jonathan Amsel
48 Governors Lane
Princeton, New Jersey 08540

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

ANSWER:

1. 1965 - 1967 - New York Health Department
2. 1975 - 1979 - Assistant Professor of Epidemiology at the University of Illinois, School of Public Health; Assistant Professor of Medical Genetics at the University of Illinois Abraham Lincoln School of Medicine; and Assistant Professor of Epidemiology at the University of Illinois Graduate School of Arts and Sciences.

3. 1979 - 1984 - Research Assistant Professor of Research Medicine and Pediatrics at the University of Pennsylvania
4. 1983 - 1984 - Chair of the Graduate Program in Epidemiology at the University of Pennsylvania and Chief of Epidemiology at the Wills Eye Hospital
5. 1984 - 1987 - American Petroleum Institute, Staff Epidemiologist
6. 1985 - present - Adjunct Associate Professor, Community Medicine, Georgetown University
7. 1987 - 1991 - Owens-Corning Fiberglas Corporate Epidemiologist
8. 1991 - 1998 - Hoechst Celanese Corporation, Director of Epidemiology
9. January 1, 1999 to present - Consultant for Hoechst, North America and Celanese Ltd

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: The defendant reasserts and incorporates herein by reference its response to Interrogatory number 2. Mr. Amsel did not work in any plant or have direct responsibility for any plant.

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

ANSWER: The defendant reasserts and incorporates herein by reference its response to Interrogatory number 2. In further response to Interrogatory number 4, the defendant states as follows: At Owens-Corning Fiberglas, Mr. Amsel was responsible for epidemiology surveillance and targeted studies. His work focused primarily on the safety and health consequences of exposure to fiberglass.

As director of epidemiology for Hoechst Celanese Corporation, Mr. Amsel was responsible for epidemiology surveillance and studies, responses to regulatory initiatives, and safety and health guidelines for the company, to the extent that they related to epidemiology issues.

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: Mr. Amsel has never been responsible for purchasing materials, construction, or supervision of any plant. He had no direct responsibility for health and safety of plant workers, although in his position as Director of Epidemiology for Hoechst Celanese Corporation, he had some input on health and safety guidelines as they related to epidemiology, and his work was part of the overall global corporate effort to maintain a safe working environment for employees.

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. Bachelor of Arts in Political Science and Economics from Grinnell College, 1962.
2. Master of Science in Administrative Medicine from Columbia University, 1969.
3. Doctor of Science in Epidemiology and Human Genetics from The Johns Hopkins University, 1974.
4. Post Doctoral Certificate in Human Genetics and Pediatrics from The Johns Hopkins University, 1975.

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

ANSWER: Mr. Amsel first heard about hazards to human health associated with asbestos exposure sometime in the late 1960s.

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: Literature and curriculum at the Columbia University School of Public Health.

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: Mr. Amsel has no personal knowledge of the identity of the person or persons with the most knowledge concerning worker health and safety issues at the Salisbury fiber plant in 1965, 1975 or 1985. In 1995, the Environmental Health and Safety Administration staff and the industrial hygienist David Smith would have had knowledge about certain worker health and safety issues at the Salisbury 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 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: Mr. Amsel has no

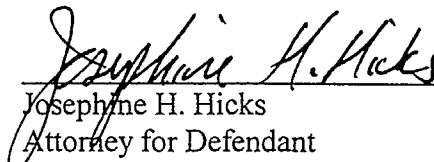
personal knowledge of the identity of the person or persons with the most knowledge concerning hazards associated with asbestos-containing materials at the HNA Salisbury plant in 1965, 1975, or 1985. Mr. Amsel is informed and believes that David Smith at the Salisbury plant had knowledge of the hazards of asbestos-containing materials in 1995.

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: Mr. Amsel has no personal knowledge of the identity of the person or persons with primary responsibility for worker health and safety at the Salisbury plant from 1965 through 1991. He is informed and believes that from 1991 to the present, the Environmental, Health and Safety Administration staff would have had primary responsibility for day-to-day worker health and safety issues, and the plant manager would have had ultimate responsibility for worker health and safety at the Salisbury plant.

This 4th day of March, 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

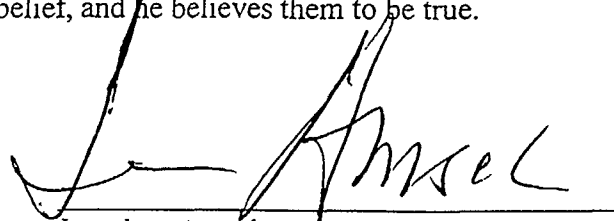
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COUNTY OF MERCER

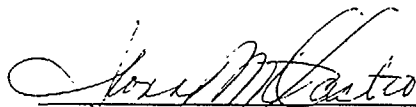
VERIFICATION

The undersigned, first being duly sworn, deposes and says that he has read the foregoing interrogatory responses and knows them to be true, based on his own personal knowledge, except as to those matters asserted on information and belief, and he believes them to be true.

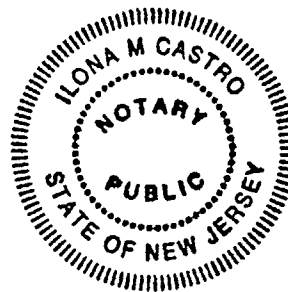
This 3 day of March, 1999.


Jonathan Amsel

Sworn to and subscribed before me
this 3 day of March, 1999.


Notary Public

My Commission Expires: 10-2-2001



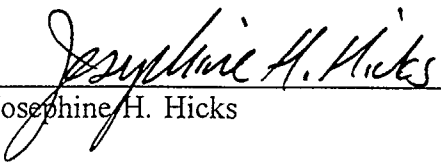
ILONA M. CASTRO
Notary Public, State of N.J.
ID# 2189854
Commission Expires October 2, 2001

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 4th day of March, 1999.



Josephine H. Hicks

OF COUNSEL:

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