

NO. 00-06-09976CV

KNOX EUGENE MANFORD and \$ IN THE DISTRICT COURT
MADELEINE MANFORD, \$
 \$
 Plaintiffs, \$
 \$
VS. \$ BROOKS COUNTY, TEXAS
 \$
BAROID DRILLING FLUIDS \$
a product service line of \$
HALLIBURTON ENERGY SERVICES, \$
INC. \$
 Defendants. \$
 \$
 \$ 79TH JUDICIAL DISTRICT

Baroid Drilling Fluids (a product service line of Halliburton Energy Services, Inc.) on behalf of Halliburton Company, Inc. and Baroid Drilling Fluids, Inc. Responds to Plaintiffs' Interrogatories as follows:

INTERROGATORY NO. 1: State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all positions, titles, or jobs held while working for Defendant of each person who supplied any information used in answering these interrogatories.

ANSWER:

The information was assembled by attorneys for Baroid, from records and files and personnel in the appropriate offices, departments and divisions of the corporation.

INTERROGATORY NO. 2: At any time prior to the filing of this suit, did Defendant receive notice that any individual who at any time used asbestos containing products manufactured by the Defendant claimed injury to his/her lungs as a result of use of Defendant's products? If so, state:

- A. The name and address of each claimant;
- B. The date of notice of each claim;
- C. A description of the claim;
- D. The type of injuries allegedly sustained by each claimant;
- E. The name and address of each attorney who represented each individual making a claim;
- F. The style and court number of each claim;
- G. The disposition of each claim that has been settled or taken to judgment;
- H. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER:

Setting aside objections to this request, not applicable, as defendant did not manufacture asbestos containing products.

INTERROGATORY NO. 3: Has Defendant at any time published, distributed or displayed any printed material, including brochures, pamphlets, catalogs, warning signs or statements, packaging or other written material of any kind or character containing any warning concerning the possibility of injury resulting from the use of asbestos-containing products and/or exposure to airborne asbestos? If so, state:

- A. The exact wording of each warning statement and a description of the material upon which the warning was printed;
- B. The method(s) used to distribute the materials to persons likely to use the asbestos-containing products or likely to be exposed to airborne asbestos;
- C. The date each warning was first issued or distributed;
- D. The name, address, and job title of each person responsible for having drafted or issued the warning statements and/or written materials;
- E. The current location of any such printed material and the custodian thereof;
- F. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.

ANSWER:

Defendant objects to this interrogatory on the grounds that it is misleading and inappropriately directed to an entity such as defendant which did not manufacture asbestos containing materials. Defendant further objects to this interrogatory on the grounds that it is so overly broad and unlimited in time and scope, as to seek documents which are irrelevant, which will be inadmissible at trial and is not reasonably calculated to lead to the discovery of the admissible evidence. Subject to and without waiver of the foregoing objections, defendant states that warnings or literature provided by the manufacturer would be passed on to defendants' purchasers. All such materials would have been written by the product manufacturer. Defendant's records are not maintained in such a fashion as to enable it to provide a more detailed response to this interrogatory.

INTERROGATORY NO. 4: State whether Defendant maintained, prior to and during the years of Plaintiff's employment in the oil field supply industry (1946-1989), copies of invoices, shipping receipts, bills of lading, purchase orders, or other documents of a similar nature relating to the sale or distribution of asbestos-containing products. If so, state:

- A. The location of such documents;
- B. The name and address of the custodian of the documents;
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.;
- D. In what form the documents can be accessed.

ANSWER:

Defendant objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of Plaintiff's alleged exposure and on the grounds that it seeks information which is irrelevant, will not be admissible at trial and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of the foregoing objections defendant states that at this time it is unaware of any document in its possession, custody or control which is responsive to this request relating to the work sites identified.

INTERROGATORY NO. 5: Has Defendant or anyone at the direction of Defendant conducted an investigation, not in anticipation of this litigation, survey or other process to identify the primary emission sources of airborne asbestos fibers and/or to assess and/or sample for the detection of, the quantity of, threshold limit value of airborne asbestos fibers in relation to Defendant's asbestos containing products? If so, please identify with particularity the entity and/or persons conducting such investigation(s), survey(s) or test(s), the dates conducted and the results.

ANSWER:

Setting aside objections to this request, not applicable.

INTERROGATORY NO. 6: Did Defendant ever arrange for any labor agency, insurance company, government agency, inspectors or anyone from your company to go to any jobsite where Defendant's asbestos containing products were being made or used to take dust level counts related to asbestos dust? If so, identify with particularity the party (ies) conducting such procedure(s), the dates conducted, the purpose of such procedure(s), and all results of such procedures.

ANSWER:

Setting aside objections to this request, not applicable.

INTERROGATORY NO. 7: Did Defendant obtain facts, knowledge or information from any industry, insurance company, governmental agency, union, and/or any other entity regarding the potential health effects and/or health hazards created for persons exposed to airborne asbestos dust? If so, please list all sources of such information and the dates received.

ANSWER:

Defendant objects to this interrogatory on the grounds that the phrase "potential health effects and/or health hazards created" renders it vague and overly broad. Defendant further objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of Plaintiff's alleged exposure. Defendant further objects on the grounds and to the extent that it seeks information which is protected from disclosure by the attorney-client and/or work product doctrines. Subject to and without waiver of the foregoing objections, to the extent that this interrogatory seeks information regarding when certain information or knowledge was obtained by defendant, defendant's records are not maintained in such a fashion as to enable defendant to identify with certainty the information was received. During the 1970's, the defendant was informed by the manufacturer of products which it resold, that the materials supplied to it complied with the relevant OSHA regulations. By way of further response, refer generally to interrogatory no. 11.

INTERROGATORY NO. 8: List each person who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians (including those physicians who would have been responsible for conducting physicals, evaluations or screenings of Defendant's employees) and industrial hygienists, and the current address, telephone number and job title of each of those individuals who has had or may have had any knowledge regarding the health effects and/or hazards of airborne asbestos dust.

ANSWER:

Defendant objects to this interrogatory on the grounds that it is overly broad, irrelevant, will not be admissible at trial, and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds that the phrase "individuals who has had or may have had knowledge regarding the health effects and/or hazards of airborne asbestos dust" renders the interrogatory so vague and ambiguous as to be unanswerable.

INTERROGATORY NO. 9: Does Defendant have in its possession, any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication;
- B. The date of publication and the names of the author and publisher (if any);
- C. The date received by Defendant;
- D. The name, job title, and address of each person who currently has possession of each publication and its present location.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum number of requests in

violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Defendant further objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it is not limited to written materials in defendant's possession at the time period relevant to this claim. To the extent that it seeks information concerning defendant's knowledge relating to asbestos, see responses to interrogatories nos. 7 and 11 herein.

INTERROGATORY NO. 10: Has Defendant at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of airborne asbestos? If so, state:

- A. The name and address of each such association or organization;
- B. The dates during which Defendant member;
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations;
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date;
 - 2. The current location of such publications;
 - 3. The custodian of such publications;
 - 4. The method or manner in which such publications are maintained.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum number of requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Defendant further objects to this request on the grounds that it seeks information which is irrelevant, will not

be admissible at trial, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of the foregoing objection, based on the information available to the defendant at this time, unknown.

INTERROGATORY NO. 11: As to the diseases asbestosis, lung cancer, and/or mesothelioma state:

- A. The date on which Defendant first learned that such disease was caused by inhalation of asbestos fibers;
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure;
- C. Who within the company first discovered, recognized or understood the adverse consequences or effects of the disease;
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects;
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in an written form;
- F. Who is the custodian of such information.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum number of requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory and its subparts on the grounds that the interrogatory is an unwarranted and misleading oversimplification of complex scientific facts and principles which are expected to be the subject of expert testimony and many of which are in dispute, including the claimed potential relationship between "inhalation of asbestos fibers" and disease. Subject to and without waiver

of the foregoing objections, defendant cannot determine when or how it was first informed that exposure to asbestos would, could or might be associated with disease. Defendant states to the best of its knowledge such information may have been provided to it in the 1970's. By way of further response, refer generally to defendant's response to interrogatory no. 7.

INTERROGATORY NO. 12: Did Defendant maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos, asbestos health hazards or asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting;
- B. The general subject matter discussed at each meeting;
- C. Who was in attendance at each meeting;
- D. Where and by whom the written minutes are presently maintained;
- E. By whom the minutes were taken and put into final format;
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory and its subparts on the grounds that it seeks information and documents which are not limited to the facts, time periods and locations of plaintiff's alleged exposure and is, therefore, overly broad.

INTERROGATORY NO. 13: Does Defendant have, or has it ever had, a Medical Department or Medical Section? If so, state:

- A. The year such Medical Department or Section was established;
- B. Whether or not such Medical Department or Section has operated continuously since being established;
- C. The name of each director, chief, or head of your Medical Department. or Section year by year, beginning with the first year of its existence and the last known address and phone number of each;
- D. State the duties and responsibilities of such Medical Department or Section.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it is not limited to the time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence. Subject to and without waiver of the foregoing objections, defendant does not have a medical department.

INTERROGATORY NO. 14: Does Defendant have, or has it ever had, a Safety Department? If so, state:

- A. The year such Safety Department was established;
- B. Whether or not such Safety Department has operated continuously since being established;
- C. The name of each director, chief, or head of your Safety Department year by year, beginning with the

first year you had a Safety Director or Safety Department, and the last known address and phone number of each;

- D. State the duties and responsibilities of such Safety Department.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it seeks information which is neither relevant nor likely to lead to the discovery of admissible evidence. Subject to and without waiver of the above objections, Defendant has had a Safety Department since at least 1972. Defendant has insufficient information at this time to provide more information in response to this request.

INTERROGATORY NO. 15: Please describe each and every occasion during the past thirty years when any regulatory agency or other governing body inspected Defendant's manufacturing facilities or asbestos containing products to ascertain whether health and safety regulations pertaining to asbestos, asbestos products, friction products, machinery calling for the use of asbestos or asbestos containing products, threshold limit values, and/or ventilation requirements were being followed or adhered to, including the date of such inspection and/or meeting, the results, and whether a written report was produced.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Setting aside objections to this request, not applicable.

INTERROGATORY NO. 16: Please state whether Defendant has at any time advised purchasers of Defendant's asbestos containing products to provide or use any safety equipment for protection against the inhalation of airborne asbestos dust when handling Defendant's asbestos containing products, including but not limited to masks, respirators, other breathing devices, protective clothing, protective gloves, etc. For each such item of equipment, please indicate when such warning was first provided, under what circumstances, and the name, address and telephone number of the person most knowledgeable concerning such actions.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Setting aside objections to this request, not applicable.

INTERROGATORY NO. 17: Please state the precise State and/or Federal regulations, laws, statutes, or other authority pertaining to industrial hygiene or worker safety and health that governed, regulated controlled and/or were applicable to airborne asbestos exposure in relation to use of asbestos containing products manufactured by Defendant.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Setting aside objections to his request, not applicable.

INTERROGATORY NO. 18: As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant was first advised of such limits or concentrations;
- B. The name of the employee or official of the company receiving such advice;
- C. How Defendant received notice of such limits or concentrations.
- D. Upon receipt of notice of such limits and/or concentrations did Defendant put into place any new procedures and/or changed Defendant's then existing policies, product designs, and/or working conditions.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Based on the information available to the defendant at this time, unknown.

INTERROGATORY NO. 19: Identify all persons, including name, address and telephone number, who provided and/or conducted or were responsible for conducting any type of training in the use of asbestos containing products manufactured by Defendant between 1946-1989.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Setting aside objections to this request, not applicable.

INTERROGATORY NO. 20: Identify all asbestos containing products manufactured or distributed by Defendant from 1946-1989. For each product, identify:

- A. The brand or trade name under which the product was marketed;
- B. The type of product;
- C. The uses for which the product was marketed;
- D. The distribution area for the product;
- E. The dates the product was manufactured;
- F. The supplier of the bulk asbestos used in Defendant's products; and
- G. The manufacturer of the bulk asbestos used in Defendant's products.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of Plaintiff's alleged exposure and on the grounds that it seeks information which is irrelevant, will not be admissible at trial

and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of the foregoing, defendant did not manufacture any asbestos containing products. Defendant did distribute the following products:

1. Flosal
2. Visbestos
3. Super Visbestos
4. Diaseal M

These products were specialty additives to the drilling muds. As to subparts E-G, not applicable.

INTERROGATORY NO. 21: Identify every journal, magazine, newspaper, or other form of media in which Defendant advertised asbestos containing products from 1946-1989. Include the exact dates and length of time the advertisement was published.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Defendant further objects to this interrogatory on the grounds that it is so overly broad and unlimited by time as to be unanswerable without undue burden. By way of further response, defendant's documents are not maintained in such a fashion as to enable defendant to respond, if at all, without undue burden and expense.

INTERROGATORY NO. 22: If Defendant's asbestos containing products were the subject of an article or reviewed by a trade journal or other publication anytime from 1946-1989, please state the name of the journal and the date the article or review was published.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Setting aside objections to this request, not applicable.

INTERROGATORY NO. 23: Identify all trade publications, union newsletters, or other publications to which Defendant was a subscriber from 1946-1989.

ANSWER:

Defendant objects to this interrogatory on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. *Tex. R. Civ. P. 190.3*. Defendant further objects to this interrogatory on the grounds it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this interrogatory on the grounds that it is overly broad in scope and seeks information which is irrelevant, will be inadmissible at trial, and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiver of the above objections, defendant states that its records are not maintained in such a fashion which would enable

it to provide a response to this interrogatory.

INTERROGATORY NO. 24: Before distributing, marketing, selling, or placing its asbestos containing products on the market, were any tests conducted by the Defendant or any agent under the Defendant's control to determine the potential health hazards involved in the use of or exposure to the materials contained in Defendant's products, such as asbestos? If the answer is affirmative please state:

- A. The name of the products tested;
- B. The date of the tests;
- C. Describe the tests that were conducted;
- D. Name, address, and job title of the persons conducting the tests; and
- E. The results of the tests.

ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Setting aside objections to this request, not applicable.

INTERROGATORY NO. 25: Describe Defendant's efforts to find a substitute or replacement for asbestos to be used in the manufacture of Defendant's products? If tests or studies were conducted please state:

- A. The name of the products tested;
- B. The date of the tests;
- C. Describe the tests that were conducted;
- D. Name, address, and job title of the persons conducting the tests; and
- E. The results of the tests.

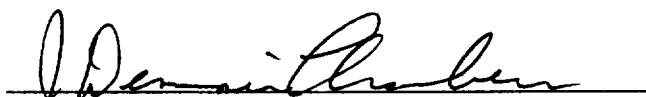
ANSWER:

Defendant objects to this interrogatory and its subparts on the grounds that it exceeds the maximum allowable number of such

requests in violation of the Rule of Limitation of Interrogatories. Tex. R. Civ. P. 190.3. Setting aside objections to this request, not applicable.

Respectfully submitted,

ATCHLEY, RUSSELL, WALDROP &
HLAVINKA, L.L.P.
1710 Moores Lane - P.O. Box 5517
Texarkana, TX 75505
Phone: (903) 792-8246
Fax: (903) 792-5801


J. Dennis Chambers
Texas Bar No. 04073800

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned counsel of record for Defendant, hereby certifies that he has forwarded to Plaintiff's Counsel, a true and correct copy of the attached document via certified mail, return receipt requested, on this 26th day of April, 2001.

Elizabeth R. Schick
3102 Oak Lawn Ave, #1100
Dallas, TX 75219

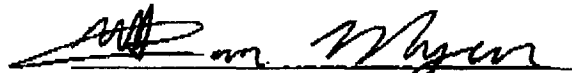

J. Dennis Chambers

VERIFICATION

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

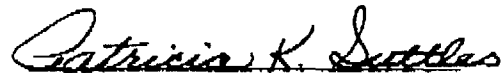
The undersigned, being first duly sworn, deposes and says:

That he is the Assistant Secretary of Halliburton Energy Services, Inc., Defendant in this lawsuit; that he is authorized to make this verification on behalf of the Corporation; that the information set forth in the foregoing Answers to Interrogatories was assembled by attorneys of Baroid Drilling Fluids, a product service line of Halliburton Energy Services, Inc. from the Corporation's records and files and from personnel in the appropriate offices, departments and divisions of the Corporation; that he is informed and, therefore, believes that the matters therein stated are true and on that ground avers that the matter stated therein are true to the best of his/her knowledge, information and belief.



W. Dan Myers, Assistant Secretary
Halliburton Energy Services, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME this 25th day of April, 2001.



NO. 00-06-09976CV

KNOX EUGENE MANFORD and	\$	IN THE DISTRICT COURT
MADELEINE MANFORD,	\$	
	\$	
Plaintiffs	\$	
	\$	
VS.	\$	BROOKS COUNTY, TEXAS
	\$	
BAROID DRILLING FLUIDS	\$	
a product service line of	\$	
HALLIBURTON ENERGY SERVICES, INC.	\$	
Defendants.	\$	
	\$	79TH JUDICIAL DISTRICT

Baroid Drilling Fluids (a product service line of Halliburton Energy Services, Inc.) on behalf of Halliburton Company, Inc. and Baroid Drilling Fluids, Inc. Responds to Plaintiffs' Requests for Production as follows:

REQUEST FOR PRODUCTION NO. 1: Produce any and all documents (memoranda and/or other writings, including but not limited to books, pamphlets, or other written materials of any kind or character) in your possession, custody or control which would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad and unlimited in time or scope to the issues of this lawsuit. Defendant further objects to this request on the grounds that it is premised upon an unfair and unwarranted oversimplification of various complex and, in many case disputed scientific issues regarding the true effects of asbestos inhalation at varying quantities and durations of exposure.

Defendant further objects to this request on the grounds that the materials currently in possession of defendant are irrelevant, will be inadmissible at trial and are not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 2: Produce any and all documents (memoranda and/or other writings) in your possession, custody or control that in any way related to the hazards of asbestos and/or airborne asbestos.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad, vague, ambiguous and unlimited to the facts, time periods or circumstances of plaintiff's alleged exposure and seeks documents which are irrelevant, will be inadmissible at trial and are not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 3: Produce any and all documents in your possession, custody or control which were disseminated or published by any person, trade association or organization of any type and that contain information relating to the hazards of asbestos and/or airborne asbestos.

RESPONSE:

Defendant objects to this request on the grounds that it is unlimited to time or circumstances of plaintiff's alleged exposure. Subject to and without waiver of the foregoing objection, see response to Request for Production Number 2, above.

REQUEST FOR PRODUCTION NO. 4: Produce any and all documents that indicate and/or refer to in any way a decision and/or discourse related to ceasing the manufacture of asbestos-containing products by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 5: Produce any photographs of asbestos products manufactured by Defendant in place or being used, fabricated and/or utilized.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 6: Produce any actual warning signs, labels, or photographs of warning signs or other statements distributed with or placed on the packaging of asbestos containing products manufactured by Defendant at any time during the last fifty-five (55) years.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 7: Produce any documents which indicate in any way that individuals claimed injury to their lungs as a result of exposure to asbestos containing products manufactured by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 8: Produce any documents, minutes or other notes or records from any meetings at which the hazards and/or potential hazards of asbestos were discussed by officers, agents, and/or employees of Defendant.

RESPONSE:

Defendant objects to this request on the grounds that it is so overly broad, vague, ambiguous and unrelated to the issues in this lawsuit that it renders any meaningful response impossible.

REQUEST FOR PRODUCTION NO. 9: Produce any and all documents, including invoices, shipping receipts, bills of lading, purchase orders, or other documents of a similar nature related to the sale, distribution, or purchase of asbestos-containing products from Defendant by Jones & Laughlin Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods relevant to plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and without waiver of the above objections, after reasonable investigation, Defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 10: Produce any and all documents, including invoices, shipping receipts, bills of lading, purchase orders, or other documents of a similar nature related to the sale, distribution, or purchase of asbestos-containing products from Defendant by Fluor Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further

objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 11: Produce any and all documents, including invoices, shipping receipts, bills of lading, purchase orders, or other documents of a similar nature related to the sale, distribution, or purchase of asbestos-containing products from Defendant by Oil Field Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 12: Produce any and all documents, including invoices, shipping receipts, bills of lading, purchase orders, or other documents of a similar nature related to the sale, distribution, or purchase of asbestos-containing products from Defendant by Newman Brothers Drilling.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 13: Provide a copy of all invoices, purchase orders, agreements, contracts, correspondences, telefaxes, telexes, and/or documents of any type passing between this Defendant and any other entity regarding the acquisition, ordering, purchasing, supplying, removal or distribution of asbestos-containing products from Defendant by Jones & Laughlin Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and

locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 14: Provide a copy of all invoices, purchase orders, agreements, contracts, correspondences, telefaxes, telexes, and/or documents of any type passing between this Defendant and any other entity regarding the acquisition, ordering, purchasing, supplying, removal or distribution of asbestos-containing products from Defendant by Fluor Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable

investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 15: Provide a copy of all invoices, purchase orders, agreements, contracts, correspondences, telefaxes, telexes, and/or documents of any type passing between this Defendant and any other entity regarding the acquisition, ordering, purchasing, supplying, removal or distribution of asbestos-containing products from Defendant by Oil Field Supply Co.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 16: Provide a copy of all invoices, purchase orders, agreements, contracts, correspondences, telefaxes, telexes, and/or documents of any type passing between this. Defendant and any other entity regarding the acquisition, ordering, purchasing, supplying, removal or distribution of asbestos-containing products from Defendant by Newman Brothers Drilling.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, after reasonable investigation, defendant is unaware of any such documents at this time.

REQUEST FOR PRODUCTION NO. 17: Produce any and all documents reflecting in any way any inspections by labor inspectors, insurance company inspectors or anyone from Defendant's company or hired by Defendant where asbestos-containing products manufactured by Defendant were being used or installed and that included the taking or measure of "dust counts."

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 18: In the event that Defendant performed or had performed any dust level counts with respect to asbestos dust produce any documents that in any way reflect or discuss the results of such studies or counts and actions, or potential actions, if any, taken as a result of such counts or studies.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 19: Please provide all documents referred to in answering Plaintiffs' Interrogatories propounded to the Defendant, identifying with specificity which documents were used to answer which interrogatories.

RESPONSE:

Defendant objects to this request on the grounds that it invades the attorney-client and attorney-work-product privileges.

REQUEST FOR PRODUCTION NO. 20: As to all such potential legal entities who are not now a party to this lawsuit, such as suppliers of Defendant's bulk asbestos, but who may be responsible for the incident in question, please provide:

- A. All documents tending to establish such liability; and,
- B. A list of all tangible items or things that may be reviewed tending to establish such liability, along with their location and the identity of the person to contact to view such tangible things.

RESPONSE:

Defendant objects to this request on the grounds that it is so vague, ambiguous and incomprehensible that no response is possible. Defendant further objects to this request on the grounds that, to the extent defendant understands it, the request violates the attorney/client and the attorney work product privileges.

REQUEST FOR PRODUCTION NO. 21: Provide a copy of all documents from which your present net worth may be ascertained.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad, vague, ambiguous, and seeks information which is irrelevant, will be inadmissible at trial and is not reasonably likely to lead to the discovery of admissible evidence at trial.

REQUEST FOR PRODUCTION NO. 22: Provide a copy of all documents regarding safety, safety training and/or safety meetings provided to or for the benefit of Plaintiff and other workers for the proper handling and use of asbestos or asbestos-containing products manufactured and/or distributed by Defendant. Include any documents given out at such safety meetings and copies of the minutes of or notes from all safety meetings or training sessions for the last fifty (50) years.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is overly broad and fails to identify with particularity the documents to be produced. Subject to and without waiver of the foregoing objections, defendant was never a manufacturer of asbestos containing products, nor was defendant an employer of the plaintiff, therefore, this request is not applicable to defendant. By way of further response, defendant did pass on these warnings provided by the product manufacturer.

REQUEST FOR PRODUCTION NO. 23: Provide a copy of all Defendant's safety and policy manuals regarding the use of or exposure to asbestos-containing products from 1940 to the present.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is argumentative to the extent that it suggests that defendant was a manufacturer of asbestos products which is denied. Subject to and without waiver of the foregoing objections, the requested documents will be produced at a mutually agreed upon time and place, if any there may be.

REQUEST FOR PRODUCTION NO. 24: Provide a copy of all reports, investigations, transcripts, memoranda, correspondence and/or documents of any type you received from, or sent to any city, county, state, or federal entity, including but not limited to the EPA, NIOSH, NIEHS or OSHA regarding either the potential health hazards or dangers associated with exposure to asbestos-containing products or airborne asbestos, and/or regarding any surveys, testing or other actions taken to determine the presence of and concentration of airborne asbestos, caused by handling and installing asbestos containing products manufactured by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 25: Provide a copy of any and all photographs or video recordings, sketches, drawings, or pictures in Defendant's custody or control or that of your attorney, or of

any agent or representative of you or your attorney, whether made as part of the reports of experts or made by you, your attorney, or persons acting as your agents or representatives, and pertaining to any asbestos-containing products manufactured by Defendant. Request is hereby made for one print of each photograph or video recording produced in response to this request.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 26: Any models, visual aids, experiments, documents or other writings or any items of demonstrative evidence prepared or preserved by you, your attorney, your experts, or any other person acting on your behalf that will or may be used in the trial of this lawsuit.

RESPONSE:

Defendant objects to this request to the extent that it may seek documents which are protected by the attorney-client and/or work-product privileges. Defendant further objects to this request on the grounds that it is premature and improperly seeks discovery of trial exhibits. Subject to and without waiver of the above objections, defendant will identify its trial exhibits at the time and in the manner required by the Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 27: Copies of all depositions of any person previously employed by you specifically including, but not limited to Defendant or Defendant's employees, representatives,, or agents, taken in connection with any alleged asbestos exposure to asbestos containing products manufactured by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 28: Provide a copy of each and every document (including all reports, memos, photographs, statements and any material collected or acquired of any investigation, and all correspondence between Defendant and Defendant's insurer, and any reports, notes or any other documents regarding testing, examinations, inspections, or opinions related in any way to asbestos or any other communication from any individual or entity to Defendant, Defendant's insurer or any agent or representative of Defendant or Defendant's insurer concerning this incident or any injuries or disabilities allegedly resulting therefrom) in Defendant's possession or control, or that of Defendant's insurer, health insurer, disability insurer - liability insurer, or other insurer relating to Defendant's claim or the investigation of this incident by Defendant, Defendant's insurer, or any individual or entity engaged for such a purpose.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request to the extent that it seeks information protected by the attorney-client, work-product and/or joint defense doctrines. Defendant further objects to this request on the grounds that it is vague and ambiguous and fails to identify with particularity the documents to be produced. Subject to and without waiver of the above objections, this request is so overly broad, vague, ambiguous and so fails to identify with particularity the documents to be produced that defendant cannot properly respond.

REQUEST FOR PRODUCTION NO. 29: Provide copies of any and all safety standards regulations rules or codes pertaining in any way to asbestos or inhalation of toxic fumes or substances whether promulgated by government or private industry or defendant from 1940 to the present.

RESPONSE:

Defendant objects to this request on the grounds that it is overly broad in time and scope to the extent that it seeks information which is not limited to the facts, time periods and locations of plaintiff's alleged exposure. Defendant further objects to this request on the grounds that it is vague and ambiguous to the extent that the phrase "toxic fumes or substances" is undefined and defendant is uncertain of its scope. Defendant further objects to this request on the grounds that it seeks information which is irrelevant will be inadmissible at trial and are not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request on the grounds that it fails to identify with particularity the documents to be produced. Defendant further objects to this request on the grounds that the information requested is public information and is as readily available to the plaintiff as it is to the defendant.

REQUEST FOR PRODUCTION NO. 30: Provide a copy of any and all contracts and/or agreements of any kind (if oral, reduce the agreement to writing) made by Defendant to supply masks and/or other safety equipment to purchasers of asbestos containing products manufactured by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 31: Provide copies of any and all documentation which in any way relates to the transport and distribution of asbestos containing products manufactured by Defendant.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 32: Provide copies or reproductions of any and all advertisements of asbestos containing products manufactured by Defendant, including, but not limited to, posters, flyers, magazines or newspaper advertisements, and audio or video recordings of radio or television commercials.

RESPONSE:

Setting aside objections to this request, not applicable.

REQUEST FOR PRODUCTION NO. 33: Provide photographs of all asbestos containing products identified in Defendant's response to Interrogatory No. 20.

RESPONSE:

See response to Interrogatory Number 23. By way of further response, to the best of its knowledge at this time defendant has no such documents.

REQUEST FOR PRODUCTION NO. 34: Provide copies of all articles or other publications identified in Defendant's response to Interrogatory No. 22.

RESPONSE:

See response to Interrogatory Number 22.

REQUEST FOR PRODUCTION NO. 35: Provide copies of the results of all product tests identified in Defendant's response to Interrogatory No. 24.

RESPONSE:

See response to Interrogatory Number 24.

REQUEST FOR PRODUCTION NO. 36: Provide copies of the results of all product tests identified in Defendant's response to Interrogatory No. 25.

RESPONSE:

See response to Interrogatory Number 25.

REQUEST FOR PRODUCTION NO. 37: Provide copies of all documents showing Defendant's efforts to find a substitute for asbestos in the manufacture of Defendant's products.

RESPONSE:

Setting aside objections to this request, not applicable.

CERTIFICATE OF SERVICE

The undersigned counsel of record for Defendant, hereby certifies that he has forwarded to Plaintiff's Counsel, a true and correct copy of the attached document via certified mail, return receipt requested, on this 26th day of April, 2001.

Mr. Paul L. Sadler
Wellborn, Houston, Adkison,
Mann, Sadler, & Hill, LLP
300 W. Main St.
Henderson, TX 75653-1109

J. Dennis Chambers

RESPONSE:

See response to Interrogatory Number 22.

REQUEST FOR PRODUCTION NO. 35: Provide copies of the results of all product tests identified in Defendant's response to Interrogatory No. 24.

RESPONSE:

See response to Interrogatory Number 24.

REQUEST FOR PRODUCTION NO. 36: Provide copies of the results of all product tests identified in Defendant's response to Interrogatory No. 25.

RESPONSE:

See response to Interrogatory Number 25.

REQUEST FOR PRODUCTION NO. 37: Provide copies of all documents showing Defendant's efforts to find a substitute for asbestos in the manufacture of Defendant's products.

RESPONSE:

Setting aside objections to this request, not applicable.

Respectfully submitted,

ATCHLEY, RUSSELL, WALDROP &
HLAVINKA, L.L.P.
1710 Moores Lane - P.O. Box 5517
Texarkana, TX 75505
Phone: (903) 792-8246
Fax: (903) 792-5801

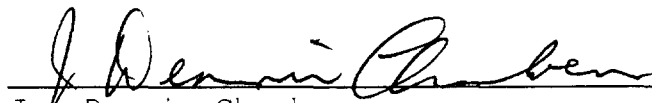


J. Dennis Chambers
Texas Bar No. 04073800
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned counsel of record for Defendant, hereby certifies that he has forwarded to Plaintiff's Counsel, a true and correct copy of the attached document via certified mail, return receipt requested, on this 26th day of April, 2001.

Elizabeth R. Schick
3102 Oak Lawn Ave, #1100
Dallas, TX 75219



J. Dennis Chambers

NO. 00-06-09976CV

KNOX EUGENE MANFORD and MADELEINE MANFORD,	\$	IN THE DISTRICT COURT
	\$	
	\$	
Plaintiffs,	\$	
	\$	
vs.	\$	BROOKS COUNTY, TEXAS
	\$	
BAROID DRILLING FLUIDS	\$	
a product service line of	\$	
HALLIBURTON ENERGY SERVICES, INC.	\$	
Defendants.	\$	
	\$	79TH JUDICIAL DISTRICT

Baroid Drilling Fluids (a product service line of Halliburton Energy Services, Inc.) on behalf of Halliburton Company, Inc. and Baroid Drilling Fluids, Inc. Responds to Requests for Admissions as follows:

REQUEST FOR ADMISSION NO. 1: Admit or deny that Defendant manufactured products that contained asbestos between 1946 and 1989.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 2: Admit or deny that asbestos containing products manufactured by Defendant were distributed and used in the oil industry.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 3: Admit or deny that, prior to 1980, Defendant was aware that airborne asbestos dust created a potential health hazard to those who breathed such dust.

RESPONSE:

Admitted in part, denied in part. Defendant objects to this request on the grounds that the request is premised upon an unfair and unwarranted oversimplification of numerous complex and, in many cases, disputed scientific and medical issues. Subject to and without waiver of the above objection, denied as stated. Defendant admits only that at some point prior to 1980 it became aware that certain pulmonary diseases could result from the inhalation, over an extended period, of substantial quantities of respirable asbestos fibers. Defendant denies the remaining allegations of this request.

REQUEST FOR ADMISSION NO. 4: Admit or deny that Defendant did not distribute any literature or warnings of any kind with its asbestos containing products regarding the potential health hazards to those who breathe airborne asbestos dust.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 5: Admit or deny that Defendant became aware of the potential health hazards of airborne asbestos between 1946 and 1989.

RESPONSE:

Defendant objects to this request on the grounds that the request is premised upon an unfair and unwarranted oversimplification of numerous complex and, in many cases, disputed scientific and medical issues. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 6: Admit or deny that Defendant is liable for Plaintiff's asbestos related illness.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 7: Admit or deny that Defendant consciously decided not to warn purchasers of its asbestos containing products of the dangers of asbestos.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 8: Admit or deny that Defendant did not warn purchasers of its asbestos containing products of the dangers of asbestos.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 9: Admit or deny that Defendant consciously decided not to place labels on packages warning purchasers of its asbestos containing products of the dangers of asbestos.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 10: Admit or deny that Defendant manufactured and/or distributed asbestos containing products after 1980.

RESPONSE:

Defendant objects to this request on the grounds that it is compound and accordingly fails to comply with The Texas Rules of

Civil Procedure, denied as stated. Subject to and without waiver of the foregoing objection it is admitted only that certain products which may have included asbestos as a component were available for purchase after 1980.

REQUEST FOR ADMISSION NO. 11: Admit or deny that Defendant manufactured asbestos containing drilling mud.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 12: Admit or deny that proper use of asbestos containing drilling mud manufactured by Defendant, would create dust.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 13: Admit or deny that dust from drilling mud manufactured by Defendant could contain asbestos fibers.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 14: Admit or deny that oil field workers using asbestos containing drilling mud manufactured by Defendant would breathe in dust from this product when using it.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 15: Admit or deny that oil field workers using asbestos containing drilling mud manufactured by Defendant would breathe in dust from this product when working around others using it.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 16: Admit or deny that asbestos containing drilling mud manufactured by Defendant was sold or distributed as a dry powder.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 17: Admit or deny that asbestos containing drilling mud manufactured by Defendant would be mixed with water to form a paste.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 18: Admit or deny that mixing asbestos containing drilling mud manufactured by Defendant would create dust.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 19: Admit or deny that Defendant provided training in the proper use of its asbestos containing products.

RESPONSE:

Not applicable.

REQUEST FOR ADMISSION NO. 20: Admit or deny that Defendant provided detailed instructions for safely handling asbestos containing products with Defendant's asbestos containing products distributed prior to 1980.

RESPONSE:

Not applicable.

REQUEST FOR ADMISSION NO. 21: Admit or deny that Defendant manufactured and distributed a line of products under the name Baroid for use in drilling for oil.

RESPONSE:

Admitted.

REQUEST FOR ADMISSION NO. 22: Admit or deny that Defendant sold and/or distributed asbestos containing products to Jones & Laughlin Supply Co.

RESPONSE:

After reasonable inquiry, at this time the information known or readily available to the defendant is insufficient to enable defendant to admit or deny this request, and the same is accordingly denied.

REQUEST FOR ADMISSION NO. 23: Admit or deny that Defendant sold and/or distributed asbestos containing products to Fluor Supply Co.

RESPONSE:

After reasonable inquiry, at this time the information known or readily available to the defendant is insufficient to enable defendant to admit or deny this request, and the same is accordingly denied.

REQUEST FOR ADMISSION NO. 24: Admit or deny that Defendant sold and/or distributed asbestos containing products to Oil Field Supply Co.

RESPONSE:

After reasonable inquiry, at this time the information known or readily available to the defendant is insufficient to enable defendant to admit or deny this request, and the same is accordingly denied.

REQUEST FOR ADMISSION NO. 25: Admit or deny that Defendant sold and/or distributed asbestos containing products to Newman Brothers Drilling.

RESPONSE:

After reasonable inquiry, at this time the information known or readily available to the defendant is insufficient to enable defendant to admit or deny this request, and the same is accordingly denied.

REQUEST FOR ADMISSION NO. 26: Admit or deny that Defendant has liability for harm caused from the use of asbestos containing Baroid drilling muds in oil field operations.

RESPONSE:

Not applicable. To the extent a response is required, denied.

REQUEST FOR ADMISSION NO. 27: Admit or deny that Defendant has liability for harm caused from the use of asbestos containing MAGCOBAR drilling muds in oil field operations.

RESPONSE:

Denied.

REQUEST FOR ADMISSION NO. 28: Admit or deny that Defendant manufactured and distributed a line of products under the name MAGCOBAR for use in drilling for oil.

RESPONSE:

Denied.

Respectfully submitted,

ATCHLEY, RUSSELL, WALDROP &
HLAVINKA, L.L.P.

1710 Moores Lane - P.O. Box 5517
Texarkana, TX 75505
Phone: (903) 792-8246
Fax: (903) 792-5801



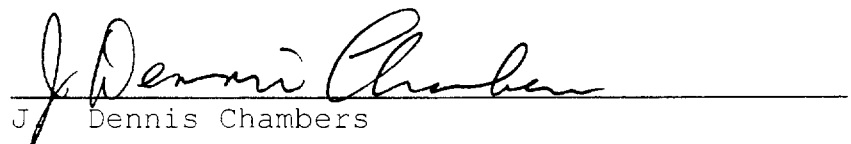
J. Dennis Chambers
Texas Bar No. 04073800

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned counsel of record for Defendant, hereby certifies that he has forwarded to Plaintiff's Counsel, a true and correct copy of the attached document via certified mail, return receipt requested, on this 26th day of April, 2001.

Elizabeth R. Schick
3102 Oak Lawn Ave, #1100
Dallas, TX 75219



J. Dennis Chambers

LAW OFFICES
ATCHLEY, RUSSELL, WALDROP & HLAVINKA, L.L.P.
1710 MOORES LANE P.O. BOX 5517
TEXARKANA, AR-TX 75505-5517

J. DENNIS CHAMBERS

LICENSED IN TEXAS & ARKANSAS

TELEPHONE (903) 792-8246

E-MAIL dchambers@arwhlaw.com

April 26, 2001

VIA Facsimile: (214) 520-1181

Mr. William K. Tapscott
Baron & Budd, PC
3102 Oak Lawn Avenue, #1100
Dallas, TX 75219

RE: *Knox Eugene & Madeline Manford vs Halliburton Company, Inc., et al*
Cause No. 00-06-09976CV

Dear Ken:

Attached hereto you will find the responses of Defendant Halliburton to the discovery you propounded in the above-referenced case to Halliburton as a successor to Baroid Drilling Fluids. Please note that I have included responses to the Requests for Admissions, Interrogatories, and Request for Production. A hard copy of these materials is being sent to you by Federal Express.

Ken, with respect to the Request for Production, you will see that we have objected to most of the requests and not produced any documentation. These objections are based primarily upon the way your requests are phrased. Apparently, Baroid was a distributor and not a manufacturer. However, we have no interest in getting into a fight over this type of discovery. We are in possession of some documents that are probably discoverable and we intend to voluntarily produce those to you. Quite frankly, those documents should have been in my office this afternoon but have not yet been received. As soon as we manage to retrieve those documents from the Federal Express system, I will send them over for your review. I am told that these documents will provide you with information responsive to many of your questions.

Please contact me if you have any questions or need any additional information. Thank you for your continued cooperation.

Yours very truly,



J. Dennis Chambers

JDC:ns
Enc-3