

NO. 00-07550-D

RICHARD AMEY, et al.,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
GAF CORPORATION, et al.	§	
	§	
Defendants.	§	95TH JUDICIAL DISTRICT

**DEFENDANTS CELANESE LTD., CNA HOLDINGS, INC.
AND CELANESE CHEMICALS, INC.'S FIRST SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S RULE 194 REQUESTS FOR DISCLOSURE**

In accordance with Rule 194 of the Texas Rules of Civil Procedure and as a first supplement to Defendants Celanese Ltd., CNA Holdings, Inc. and Celanese Chemicals Inc.'s (collectively referred to herein as "Celanese") Responses to Plaintiff's Rule 194 Requests for Disclosure, Celanese provides the following information:

- (f) For any testifying expert: 1) the expert's name, address, and telephone number; 2) the subject matter on which the expert will testify; 3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information; 4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party: (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and (B) the expert's current resume and bibliography:

1. J. LeRoy Balzer, Ph.D., 408 Horse Trail Court, Alamo, California 94507; (925) 274-0826.

Dr. Balzer has a Bachelor of Science degree in Public Health Microbiology and a Master of Science degree in Preventive Medicine/Public Health, which were awarded by the University of California at Los Angeles in 1962 and 1963, respectively. He earned a Doctor of Philosophy degree in

Environmental Health Science/Industrial Hygiene from the University of California at Berkeley in 1971. From 1966 to 1971, he was employed by the University of California School of Public Health as a research associate and research fellow. In 1966, he became involved in a coordinated research program of occupational medicine, industrial hygiene and education of insulation contractors. This intense study of the construction industry was sponsored through grants from the United States Public Health Service and involved observing the work environment of individuals working with asbestos-containing insulation and related products.

Dr. Balzer worked as a certified industrial hygienist from 1973 until 1987 when he became an Assistant Vice Chancellor at the University of California at San Francisco. He retired in 1994 and became a full-time consulting industrial hygienist and was appointed an Assistant Clinical Professor, School of Medicine, University of California Health Sciences. He is a member of the ACGIH (affiliate), AIHA and other professional organizations reflected on Dr. Balzer's curriculum vitae, which was provided to Baron & Budd in connection with the *May* and *Dolezal* cases. Dr. Balzer may testify at trial of this case live or by deposition.

Dr. Balzer has other personal knowledge of relevant facts based on his field work involving the use of asbestos-containing products and the surrounding occupational environment, but he also possesses general expertise in his field based upon specialized knowledge, skills and training. Dr. Balzer may offer opinions in this case about the general nature of the working environment in industrial locations such as where plaintiff worked, to include testimony regarding the composition and asbestos content, if any, of products used in such environments and the ability of such products to release asbestos fiber under certain conditions. Dr. Balzer may provide testimony on the availability of materials as substitutes for asbestos-containing products. Dr. Balzer will testify regarding an individual's exposure to asbestos from different media, to include circumstances and occupational settings that may result in direct exposure from persons having contact with asbestos-containing products or equipment, circumstances that may result in lower indirect or bystander exposures for others in the working environment. His testimony will be based, in part, on the results of testing which he has performed or reviewed for products which are the same or substantially similar to those which are anticipated to be discussed in this case. Dr. Balzer will also testify about industrial hygiene principles and methodologies used to determine potential hazards related to asbestos exposure, and how those principles and methodologies have changed over time.

Additionally, Dr. Balzer, based on personal knowledge and a review of medical, scientific and/or technical literature, will provide historical state-of-the-art testimony on the gradual development of knowledge within industry

and within the field of industrial hygiene about asbestos exposure levels and suitable control measures. Dr. Balzer will address the evolution of workplace practices available to control exposures to include historical development of the use of respiratory protection in association with the handling of asbestos-containing products. Finally, Dr. Balzer will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of threshold limit values and permissible exposure levels to asbestos developed by professional organizations and government agencies.

2. Lawrence R. Birkner, CIH, CSP, McIntyre, Birkner & Associates, Inc., 2026 El Monte Drive, Thousand Oaks, California 91362-1822; (805) 494-8173.

Mr. Birkner is a certified industrial hygienist and certified safety professional. He received a Bachelor of Science degree from Portland State University in 1973 and a Masters Degree in Occupational Safety and Health at New York University in 1975. Between 1974 - 1976, Mr. Birkner worked closely with Dr. Irvin Selikoff and others at Mount Sinai while employed as a safety and health research specialist at Environmental Sciences Laboratory in New York. From 1976 through 1996, Mr. Birkner worked extensively as a practicing industrial hygienist in American industry; in the course of that employment, Mr. Birkner worked as a corporate industrial hygienist for Celanese Corporation between 1977 - 1981. Mr. Birkner is a fellow of the AIHA and a member of the other professional industrial hygiene organizations reflected on Mr. Birkner's curriculum vitae, which was provided to Baron & Budd in connection with the *May* and *Dolezal* cases.

Mr. Birkner will provide testimony regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. Mr. Birkner may give testimony regarding the level of fiber release, if any, from asbestos-containing products in the occupational setting and may testify regarding the availability of materials as substitutes for asbestos-containing products. He may testify as to issues involving re-entrainment and fiber drift. Mr. Birkner may also testify regarding work practices applicable to various types of occupations using products that contain asbestos, and he will provide a retrospective assessment or estimate of plaintiff's likely exposure to asbestos in a Celanese work environment based on historical literature and the facts available in this case.

Mr. Birkner has personal knowledge of relevant facts, but he also possesses generalized expertise in his field based on his specialized knowledge, skills and training. He may provide testimony regarding the applicability of the

ACGIH, OSHA and EPA guidelines as they relate to occupational exposures to various types of asbestos-containing products. Mr. Birkner may testify regarding the size, construction, layout and working environment of facilities such as where plaintiff worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of products present in the plaintiff's workplace and may testify concerning the ability of such products to emit asbestos fibers under certain conditions. Mr. Birkner may testify to the dust levels produced by particular occupational operations and products, to include those associated with the use of pipe and block insulation.

Mr. Birkner may testify about the development of literature and information about asbestos-related diseases as they relate to the gradual development of knowledge within industry and within the field of industrial hygiene about asbestos exposure and appropriate control measures. He will address the evolution of workplace practices available to control exposures, to include the historical development of the use of respiratory protection in association with the handling of asbestos-containing products. Mr. Birkner will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of permissible exposure levels to asbestos developed by professional organizations and government agencies. He will discuss his own research into asbestos-related diseases as they relate to industrial hygiene, the carcinogenicity of various fiber types as they relate to industrial hygiene, and the relationship, if any, between asbestos and various diseases. Mr. Birkner will provide testimony regarding the epidemiology of asbestos-related diseases, latency, state-of-the-art, and other related matters as they impact industrial hygiene. Based on the above evidence developed in this case, Mr. Birkner will testify that the plaintiff at issue had little or no opportunity for any harmful exposure to asbestos while working at a Celanese facility because of the nature of plaintiff's occupation and particular working environment, and he will also testify that Celanese's approach to the handling and control of any asbestos-containing materials on its premises were reasonable in light of available information and industrial hygiene practices at different points of time. He may also testify as to any matter raised by experts called by plaintiff or any co-defendants in this action.

3. James D. Crapo, M.D., National Jewish Medical and Research Center, 1400 Jackson Street, Denver, Colorado 80206; (303) 398-1436.

Dr. Crapo received a Bachelor of Science degree from Brigham Young University in 1967 and his medical degree from the University of Rochester New York in 1971. He taught medicine for many years at Duke University in Durham, North Carolina. Dr. Crapo is board certified in internal medicine with a subspecialty certification in pulmonary disease. He presently practices medicine at the National Jewish Medical Center in Denver, Colorado and

teaches today at the University of Colorado Health Science Center. Dr. Crapo is a fellow of the American Thoracic Society, the American College of Chest Physicians and other professional organizations reflected on Dr. Crapo's curriculum vitae, which was provided to Baron & Budd in connection with the *May* and *Dolezal* cases. Dr. Crapo may testify live or by deposition at trial in this matter.

Dr. Crapo is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity and the potential for asbestos-related disease as a result of exposure to the different types of fiber. Dr. Crapo is also expected to testify as to general medical issues and physiology.

Dr. Crapo's testimony is based in part on the personal knowledge of relevant facts, but he also possesses general expertise in his field based upon specialized knowledge, skills and training. Dr. Crapo is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether such exposure occurred for a sufficient period of time and in a sufficient dose to be of medical consequence, and whether such exposure could be considered a substantial contributing factor to plaintiff's alleged disease. In connection with this, based on his own experience and a review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Crapo will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession of the asbestos-related illnesses. Dr. Crapo may provide testimony regarding the reasonableness of Celanese's usage and control of asbestos at its premises from a medical standpoint based on the developing state of medical knowledge concerning asbestos over time.

Dr. Crapo is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Crapo is expected to testify as to the information necessary to determine whether a group of people or persons are at risk for contracting an asbestos-related disease and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Crapo is expected to discuss epidemiological analysis of asbestos-related disease in the context of given levels of exposure, and to discuss how such analysis may be applied to the evidence regarding the plaintiff in this case.

Finally, Dr. Crapo may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Crapo may also testify regarding the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with

developing cancers. Dr. Crapo may also testify about any matter raised by experts called by plaintiff or any co-defendant, to include but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

4. Dorsett D. Smith, M.D., 4310 Colby Avenue, Suite 201, Everett, Washington 98203; (425) 259-5171.

Dr. Smith received his Bachelor of Arts degree from Colgate University in 1959 and his medical degree from the University of Pennsylvania Medical School in 1963. Dr. Smith is board certified in internal medicine with a subspecialty certification in pulmonary disease. Dr. Smith has taught medicine at Johns Hopkins Hospital and the University of Washington Hospital for many years through the present. Dr. Smith is a NIOSH certified "B" reader and is fellow of the American Thoracic Society, the American College of Chest Physicians, the American College of Occupational and Environmental Medicine and other professional organizations reflected on Dr. Smith's curriculum vitae, which was provided to Baron & Budd in connection with the *May* and *Dolezal* cases

Dr. Smith will testify about the pathology of asbestos-related diseases, his research into asbestos-related diseases, the carcinogenicity of various asbestos fiber types, the potential for asbestos-related disease as a result of exposures to the different types of fibers and the relationship, if any, between asbestos and various illnesses. Dr. Smith will also testify regarding the general pulmonary aspects of asbestos exposure, including matters such as dose response, latency and the required fiber burden associated with asbestos-related illnesses. Dr. Smith is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether, based on his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, whether any exposure at a facility owned or operated by Celanese could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Smith has personal knowledge of certain relevant facts but also possesses general expertise in his field based upon specialized knowledge, skills and training. Based upon his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Smith will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession about the various diseases associated with asbestos and about the asbestos exposure levels thought to be associated with each disease. Dr. Smith will testify regarding the reasonableness of Celanese's historical usage and control of asbestos in its workplace from a medical standpoint based on the information available in the general medical

literature and on the types of preventative measures considered by the general medical community as appropriate in the different decades from 1900 through the present.

Dr. Smith is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Smith is expected to testify as to the information necessary to determine whether a group of people are at risk of contracting a particular asbestos-related disease, and whether it is scientifically possible to attribute a disease to a particular exposure. Dr. Smith is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the evidence in this case and to the plaintiff.

Dr. Smith may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Smith is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

5. Mark R. Stenzel, CIH, P.O. Box 850235, Richardson, Texas 75085-0235; (972) 404-3207.

Mr. Stenzel is a practicing certified industrial hygienist. He holds a Bachelor of Science degree in mathematics and chemistry and a Master of Science degree in physical chemistry, which he received from the University of Illinois in 1975. In 1973, Mr. Stenzel was hired by Celanese Chemical Company and worked as a lab chemist/health chemist at its Pampa plant, where he performed industrial hygienist duties to include air monitoring. He became a certified industrial hygienist for Celanese. In that capacity, he had direct contact with each plant in the company and was the hygiene personnel at the plant, company and corporate levels. In 1983, Mr. Stenzel became Manager of Industrial Hygiene for Celanese and held that position through 1992. Since 1992, he has been otherwise employed in industry as an industrial hygienist. Mr. Stenzel is a member of the AIHA, the American Academy of Industrial Hygienists and other professional organizations reflected on Mr. Stenzel's curriculum vitae, which was provided to Baron & Budd in connection with the *May* and *Dolezal* cases. Mr. Stenzel may testify at trial live or by deposition.

Most of Mr. Stenzel's testimony will be factual in nature and will address the development of Celanese's industrial hygiene and environmental, safety and health programs from their inception through the 1980s. However, this

disclosure is made in an abundance of caution because Mr. Stenzel also possesses general expertise in his field based upon specialized knowledge, skills and training, and some areas of his testimony may be informed by professional judgment and opinion. Mr. Stenzel will address the nature and structure of Celanese's industrial hygiene programs and the industrial hygiene and occupational safety practices adopted at Celanese facilities over time. From a review of company documents and other materials, Mr. Stenzel will testify about air monitoring for asbestos exposure and other workplace substances conducted at Celanese plants and the low exposures/low risk levels indicated by the available monitoring data.

From 1977 forward, Mr. Stenzel was intimately involved in the creation and design of Celanese's Health Monitoring System, to include its worker tracking module, health monitoring module and retrospective exposure assessment module. Mr. Stenzel piloted the worker tracking module, health monitoring module and retrospective exposure assessment module. Mr. Stenzel piloted the worker tracking module at the Pampa plant and helped implement all modules at other Celanese facilities between 1978 – 1981. Mr. Stenzel will testify that the system was state-of-the-art at the time and would be considered state-of-the-art today.

Based on a review of plant and company documents, Mr. Stenzel will testify about how each module system was implemented throughout the company and at each company plant. Mr. Stenzel will provide testimony regarding the correlation of worker tracking exposure data and retrospective exposure data with the alleged exposure claimed by plaintiff. Based on his assessment of these materials, Mr. Stenzel is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and the potential risk for developing an occupational disease associated with that exposure. Finally, Mr. Stenzel may provide testimony regarding mortality studies and similar disease assessments which involved the workforce employed at Celanese's plants. The nature of those studies are referenced in the attached curriculum vitae.

6. Ernest M. Dixon, M.D., Sc.D., 6305 Evermay Drive, McLean, Virginia 22101.

Dr. Dixon received his medical degree from the University of Virginia in 1948 and a doctorate in occupational health from the University of Cincinnati in 1957. Dr. Dixon has held various occupational health positions in industry and served as Celanese's corporate medical director from 1966 - 1981. A curriculum vitae is available upon request. Dr. Dixon may testify at trial in this case live or by deposition.

Dr. Dixon's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's occupational health, industrial hygiene and environmental program from their inception through

the 1980s. Dr. Dixon will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the occupational health and safety practices adopted at Celanese's facilities over time. Dr. Dixon will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's occupational health and safety programs were well developed and advanced for their time; that the potential for asbestos exposure at each plant over time was extremely low; and that no worker present at any Celanese plant was considered to be at risk of incurring any asbestos-related illness based on the information reasonably available to the occupational health community during his period of responsibility.

Dr. Dixon's testimony will be factual in nature based on personal knowledge in relevant areas. However, Dr. Dixon also possesses general expertise in the fields of medicine and occupational health based on specialized knowledge, skills and training. This disclosure is made in an abundance of caution because certain aspects of Dr. Dixon's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

7. Mr. Charles S. Laubly, 2225 North Tucson Boulevard, Tucson, Arizona 85716.

Mr. Laubly received a Bachelor of Science degree from Georgia Tech in 1949. Mr. Laubly worked as field industrial hygienist thereafter and was employed as a corporate industrial hygienist by Celanese between 1967 - 1979. A curriculum vitae is available upon request. Mr. Laubly may testify at trial in this case live or by deposition.

Mr. Laubly's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's industrial hygiene and environmental programs from their inception through the 1980s. Mr. Laubly will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the industrial hygiene and safety practices adopted at Celanese's facilities over time. Mr. Laubly will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's industrial hygiene and safety programs were well developed and advanced for their times; that the usage of asbestos at Celanese's facilities were relatively minor and that the potential for asbestos exposure at each plant over time was extremely low; and that no worker present at any Celanese plant was considered to be at risk of incurring any asbestos-related illness based on the information reasonably available to the occupational health community during his period of responsibility.

Mr. Laubly's testimony will be factual in nature based on personal knowledge in relevant areas. However, Mr. Laubly also possesses general expertise in the field of industrial hygiene based on education, training and experience. This disclosure is made in an abundance of caution because certain aspects of Mr. Laubly's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

8. Herbert J. Kolodner, Ph.D., P.E., 777 Pebble Beach Drive, Crescent City, California 95331-3634.

Dr. Kolodner received a Master's degree in safety from the University of Maryland in 1960 and a doctorate in industrial safety from New York University in 1973. Dr. Kolodner has held various safety positions in industry and served as Celanese's corporate safety director from 1970 - 1984. A curriculum vitae is available upon request. Dr. Kolodner may testify at trial in this case live or by deposition.

Dr. Kolodner's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's occupational safety and environmental programs from their inception through the 1980s. Dr. Kolodner will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the safety practices adopted at Celanese's facilities over time. Dr. Kolodner will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's safety programs were well developed and advanced for their times; that the usage of asbestos at Celanese's facilities were relatively minor and the potential for asbestos exposure at each plant over time was extremely low.

Dr. Kolodner's testimony will be factual in nature based on personal knowledge in relevant areas. However, Dr. Kolodner also possesses general expertise in the field of industrial hygiene based on education, training and experience. This disclosure is made in an abundance of caution because certain aspects of Dr. Kolodner's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

9. William L. Dyson, PhD., C.I.H., Workplace Hygiene, LLC, 1022 Jefferson Road, Greensboro, North Carolina 27140

Dr. Dyson is a certified industrial hygienist. He received a bachelor of science degree from North Carolina State University in 1973, a master's degree in environmental health engineering from Northwestern University in 1971, and received his doctorate in environmental health engineering from Northwestern University in 1975. From 1967 through 1969, Dr. Dyson worked as a field industrial hygiene engineer for the U.S. Public Health

Service providing industrial hygiene services to the public. From 1973 through 1982, Dr. Dyson worked extensively as a practicing industrial hygienist in American industry. Dr. Dyson has worked as a self-employed industrial hygiene consultant from that time through the present. Dr. Dyson is a fellow of the AIHA, a member of the American Academy of Industrial Hygiene, a diplomat of the American Board of Industrial Hygiene, a member of the American Society of Safety Engineers and other professional organizations reflected on the curriculum vitae of Dr. Dyson, which was provided to Baron & Budd in connection with the *Vicente Rodriguez* case.

Dr. Dyson will provide testimony regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. Dr. Dyson may give testimony regarding the level of fiber release, if any, from asbestos-containing products in the occupational setting and may testify regarding the availability of materials as substitutes for asbestos-containing products. He may testify as to issues involving re-entrainment and fiber drift. Dr. Dyson may also testify regarding work practices applicable to various types of occupations using products that contain asbestos, and he will provide a retrospective assessment or estimate of plaintiff's likely exposure to asbestos in a Celanese work environment based on historical literature and the facts available in this case.

Dr. Dyson has personal knowledge of relevant facts, but he also possesses generalized expertise in his field based on his specialized knowledge, skills and training. He may provide testimony regarding the applicability of the ACGIH, OSHA and EPA guidelines as they relate to occupational exposures to various types of asbestos-containing products. Dr. Dyson may testify regarding the size, construction, layout and working environment of facilities such as where plaintiff worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of products present in the plaintiff's workplace and may testify concerning the ability of such products to emit asbestos fibers under certain conditions. Dr. Dyson may testify to the dust levels produced by particular occupational operations and products, to include those associated with the use of pipe and block insulation.

Dr. Dyson may testify about the development of literature and information about asbestos-related diseases as they relate to the gradual development of knowledge within industry and within the field of industrial hygiene about asbestos exposure and appropriate control measures. He will address the evolution of workplace practices available to control exposures, to include the historical development of the use of respiratory protection in association

with the handling of asbestos-containing products. Dr. Dyson will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of permissible exposure levels to asbestos developed by professional organizations and government agencies. He will discuss his own research into asbestos-related diseases as they relate to industrial hygiene, the carcinogenicity of various fiber types as they relate to industrial hygiene, and the relationship, if any, between asbestos and various diseases. Dr. Dyson will provide testimony regarding the epidemiology of asbestos-related diseases, latency, state-of-the-art, and other related matters as they impact industrial hygiene. Based on the above evidence developed in this case, Dr. Dyson will testify that the plaintiff at issue had little or no opportunity for any harmful exposure to asbestos while working at a Celanese facility because of the nature of plaintiff's occupation and particular working environment, and he will also testify that Celanese's approach to the handling and control of any asbestos-containing materials on its premises were reasonable in light of available information and industrial hygiene practices at different points of time. He may also testify as to any matter raised by experts called by plaintiff or any co-defendants in this action.

10. William G. Hughson, M.D., PhD., Center for Occupational and Environmental Medicine, UCSD Medical Center, 200 West Arbor Drive, San Diego, California 92103-8800

Dr. Hughson received his bachelor of science degree from the University of Calgary in 1970 and his medical degree from that same institution in 1973. He received his doctorate in epidemiology from Oxford University in 1977. Dr. Hughson is board certified in internal medicine with subspecialty certifications in pulmonary medicine and occupational medicine. Dr. Hughson has taught medicine at the University of California, San Diego for many years through the present. Dr. Hughson is a fellow of the American Thoracic Society, The American College of Chest Physicians, The American College of Occupational and Environmental Medicine and other professional organizations reflected on Dr. Hughson's curriculum vitae, which was provided to Baron & Budd in connection with the *Vicente Rodriguez* case.

Dr. Hughson will testify about the pathology of asbestos-related diseases, his research into asbestos-related diseases, the carcinogenicity of various asbestos fiber types, the potential for asbestos-related disease as a result of exposures to the different types of fibers and the relationship, if any, between asbestos and various illnesses. Dr. Hughson will also testify regarding the general pulmonary aspects of asbestos exposure, including matters such as dose response, latency and the required fiber burden associated with asbestos-related illnesses. Dr. Hughson is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether, based on his own experience and his

review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, whether any exposure at a facility owned or operated by Celanese could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Hughson has personal knowledge of certain relevant facts but also possesses general expertise in his field based upon specialized knowledge, skills and training. Based upon his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Hughson will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession about the various diseases associated with asbestos and about the asbestos exposure levels thought to be associated with each disease. Dr. Hughson will testify regarding the reasonableness of Celanese's historical usage and control of asbestos in its workplace from a medical standpoint based on the information available in the general medical literature and on the types of preventative measures considered by the general medical community as appropriate in the different decades from 1900 through the present.

Dr. Hughson is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Hughson is expected to testify as to the information necessary to determine whether a group of people are at risk of contracting a particular asbestos-related disease, and whether it is scientifically possible to attribute a disease to a particular exposure. Dr. Hughson is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the evidence in this case and to the plaintiff.

Dr. Hughson may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Hughson is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

11. Peter J. Barrett, M.D., 300 Boylston Street, Suite 714, Boston, Massachusetts 02116-3923

Dr. Barrett received his bachelor of arts degree from the College of The Holy Cross in 1964 and his medical degree from Tufts University School of Medicine in 1968. Dr. Barrett is board certified in diagnostic radiology and

nuclear medicine. Dr. Barrett has taught radiology at Harvard University and at other institutions over the years. He is a NIOSH certified "B" reader and is a fellow of the American Thoracic Society, the American College of Chest Physicians, the American College of Radiology and other professional organizations reflected on Dr. Barrett's curriculum vitae, which was provided to Baron & Budd in connection with *Vicente Rodriguez* case.

12. Ilan Allan Feingold, M.D., FRCP(C), FCCP, Chief of Division of Pulmonary Medicine, South Miami Hospital, 6200 S.W. 73rd St., Miami, Florida 33143; (305) 661-4611

Dr. Feingold will testify about the pathology of asbestos-related diseases, his research into asbestos-related diseases, the carcinogenicity of various asbestos fiber types, the potential for asbestos-related disease as a result of exposures to the different types of fibers and the relationship, if any, between asbestos and various illnesses. Dr. Feingold will also testify regarding the general pulmonary aspects of asbestos exposure, including matters such as dose response, latency and the required fiber burden associated with asbestos-related illnesses. Dr. Feingold is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether, based on his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, whether any exposure at a facility owned or operated by Celanese could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Feingold has personal knowledge of certain relevant facts but also possesses general expertise in his field based upon specialized knowledge, skills and training. Based upon his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Feingold will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession about the various diseases associated with asbestos and about the asbestos exposure levels thought to be associated with each disease. Dr. Feingold will testify regarding the reasonableness of Celanese's historical usage and control of asbestos in its workplace from a medical standpoint based on the information available in the general medical literature and on the types of preventative measures considered by the general medical community as appropriate in the different decades from 1900 through the present.

Dr. Feingold is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Feingold is expected to testify as to the information necessary to determine whether a group of people are

at risk of contracting a particular asbestos-related disease, and whether it is scientifically possible to attribute a disease to a particular exposure. Dr. Feingold is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the evidence in this case and to the plaintiff.

Dr. Feingold may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Feingold is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases. Dr. Feingold's CV has been provided to Baron & Budd in connection with the *Dolezal* case.

13. John R. Holcomb, M.D. 4410 Medical Drive, San Antonio, Texas 78229-0373; (210) 692-9400

Dr. Holcomb will testify concerning examination and diagnosis of the physical condition of the plaintiff and/or his medical records. He may testify concerning the overall condition and the relationship of plaintiff's condition, if any, to plaintiff's exposure to asbestos. He may also testify concerning (a) anatomy and function of the respiratory and circulatory systems; (b) nature of asbestos; (c) the symptomatology, disease process and diagnosis of asbestosis and cancer associated with respiratory system, peritoneum, and peritoneal cavity; (d) the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; (e) the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; (f) methods of diagnosis of various diseases, particularly the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos related diseases; (g) incidence of lung cancer among individuals with asbestosis compared with non-asbestotic asbestos workers and with the general population; (h) cigarette smoking and its effects on the lung; (i) the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect; (j) difference between impairment and disability; (k) effect of asbestosis on disability and life expectancy; (l) the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer; and (m) historical and/or medical literature. Dr. Holcomb's C.V. has already been provided to Baron & Budd in connection with the *May* and *Dolezal* cases.

14. Dr. George Delclos, 6550 Fannin, Houston, Texas 77030; 713-790-6250

Dr. Delclos will testify concerning examination and diagnosis of the physical condition of the plaintiff and/or his medical records. He may testify concerning the overall condition and the relationship of plaintiff's condition, if any, to plaintiff's exposure to asbestos. He may also testify concerning (a) anatomy and function of the respiratory and circulatory systems; (b) nature of asbestos; (c) the symptomatology, disease process and diagnosis of asbestosis and cancer associated with respiratory system, peritoneum, and peritoneal cavity; (d) the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; (e) the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; (f) methods of diagnosis of various diseases, particularly the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos related diseases; (g) incidence of lung cancer among individuals with asbestosis compared with non-asbestotic asbestos workers and with the general population; (h) cigarette smoking and its effects on the lung; (i) the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect; (j) difference between impairment and disability; (k) effect of asbestosis on disability and life expectancy; (l) the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer; and (m) historical and/or medical literature. Dr. Delclos' CV is attached hereto.

15. Subject to the right to object to and contest qualifications and admissibility as provided in the Texas Rules of Evidence 702 through 705 and the law of this state, Defendant cross-designates plaintiff's expert witnesses as follows:
- a) Plaintiff Kirby Grimes' Disclosures Pursuant to Texas Rules of Civil Procedure 194, served on or about August 7, 2001;
 - b) Plaintiff Kirby Grimes' Answers to Master Discovery Requests to All Plaintiffs in All Asbestos-Related Person Injury and Death Cases filed in Dallas County and Supplemental Disclosures Pursuant to Texas Rule of Civil Procedure 194, served on or about November 1, 2001;
 - c) Plaintiff Kirby Grimes' Supplemental Answers to Master Discovery Requests to All Plaintiffs in All Asbestos-Related Person Injury and Death Cases filed in Dallas County and Supplemental Disclosures Pursuant to Texas Rule of Civil Procedure 194, served on or about December 7, 2001; and

- d) Dr. Richard Tannen
8 Medical Parkway, Ste. 201
Dallas, Texas 75234
(872) 243-8363
Plaintiff Grimes' diagnosing physician

16. Subject to the right to object to and contest qualifications and admissibility as provided in the Texas Rules of Evidence 702 through 705 and the laws of this state, Defendant designates the following treating physicians of plaintiff's decedent:

- a. Dr. Campbell
Jasper, Texas
Complete Address and Telephone Number Unknown
- b. Dr. Ramon Garcia
Southeast Texas Imaging, L.L.P
1323 S. 27th Street, Ste. 700
Nederland, Texas 77627
(409) 729-5400
- c. Dr. Kalia
Lufkin VA Hospital - Outpatient Clinic
1301 West Frank Ave.
Lufkin, Texas 75904-3305
(936) 637-1347
- d. Physicians and/or
Custodian of Records for
Richardson Hospital
Jasper, Texas
Complete Address and Telephone Number Unknown
- e. Physicians and/or
Custodian of Records for
Mary E. Dickerson Memorial Hospital
1001 Dickerson Drive
Jasper, Texas
(409) 383-2300

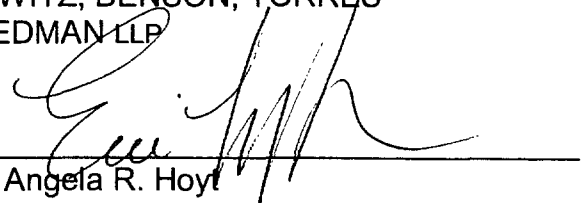
The above-listed treating physicians are anticipated to testify regarding plaintiff's medical history, treatment, diagnosis and prognosis based upon their treatment of plaintiff, and they may testify live at trial or by deposition.

17. Defendant further cross-designates any and all experts designated by other defendants in this action

Defendant reserves the right to amend or supplement this disclosure pursuant to Rule 193.5 of the Texas Rules of Civil Procedure. Defendant further reserves the right to call undesignated expert witnesses in rebuttal, whose identities and testimony cannot reasonably be foreseen until plaintiff's named experts provide written reports in this case and/or have presented testimony and evidence at trial.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
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By: 

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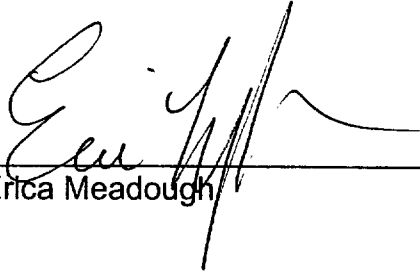
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CELANESE LTD., CNA HOLDINGS, INC.
AND CELANESE CHEMICALS, INC.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via facsimile and/or hand delivery and/or U.S. mail, postage prepaid, to all counsel of record on this 19th day of December, 2001.


Erica Meadough

1

CURRICULUM VITAE
January 2000

NAME: George L. Delclos, M.D., M.P.H.

DATE/PLACE OF BIRTH: May 25, 1956
Manchester, United Kingdom

MARITAL STATUS: Married (Concepción)
4 children (Carlos, Sara, Marta, Pablo)

ADDRESSES:

Offices

Southwest Center for Occupational and
Environmental Health
University of Texas-Houston Health
Science Center School of Public Health
P.O. Box 20186
Houston, Texas 77225
Phone: (713) 500-9459
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University of Texas Health Services
7000 Fannin #1620
Houston, Texas 77030
Phone: (713) 500-3267

Home

5735 Reamer
Houston, TX 77096
Phone: (713) 772-6234

EXHIBIT

I

EDUCATION:***High School***

Strake Jesuit College
Preparatory
Houston, TX
1974 - Honors

I.N.E.M. Alfonso II "El Casto"
Oviedo, Spain
1974

Undergraduate/Graduate

University of Navarra School of
Medicine
Pamplona, Spain
1974-1976

M.D. degree (Honors)
University of Barcelona School of
Medicine, Barcelona, Spain
1976-1981

M.P.H. degree (Occupational Health)
University of Texas School of Public
Health
Houston, TX
1986 - 1988

Postgraduate

Postdoctoral fellowship
Department of Community Medicine
Baylor College of Medicine
Houston, TX
Nov. 1981 - June 1982

Internship in Internal Medicine
Department of Medicine
Baylor College of Medicine
Houston, TX
June 1982 - June 1983

Residency in Internal Medicine
Department of Medicine
Baylor College of Medicine
Houston, TX
June 1983 - June 1985

Subspecialty fellowship
 Pulmonary and Critical Care Section
 Department of Medicine
 Baylor College of Medicine
 Houston, TX
 August 1985 - October 1988

MEDICAL LICENSES:

Texas State Board of Medical
 Examiners license #G4971. 1983-
 present.

Spain. 1981-present.

BOARD CERTIFICATIONS:

American Board of Internal Medicine.
 September 1985.

American Board of Internal Medicine
 (Pulmonary Medicine). November 1988.

American Board of Preventive Medicine
 (Occupational Medicine). November
 1989.

OTHER CERTIFICATIONS:

Certificate of the Educational Commission on Foreign Medical Graduates
 (ECFMG). Examination passed in January 1981.

Federal Licensing Examination (FLEX) passed in June 1983.

National Institute for Occupational Safety and Health (NIOSH)-certified 'B'
 Reader

Certified: June 1987.

Recertified: April 1991.

Recertified: May 1995.

Recertified: May 1999.

Certified Spirometry Technician
 NIOSH-approved course, No. 21
 November 22, 1987

ACADEMIC APPOINTMENTS AND SCHOLARSHIPS:

Associate Professor of Occupational Medicine (with tenure)
The University of Texas-Houston Health Science Center School of Public Health. 1993 - present

Associate Professor (cross-appointment). The University of Texas-Houston Health Science Center School of Nursing. 1995 - present.

Adjunct Associate Professor. Department of Industrial Engineering. University of Houston Cullen College of Engineering. 1997 - present.

Clinical Assistant Professor of Medicine. Baylor College of Medicine. 1988 - present

Assistant Professor of Epidemiology and Occupational Medicine
The University of Texas-Houston Health Science Center
School of Public Health. 1989 - December 1992.

Research Fellow. American Lung Association/San Jacinto Chapter
1986 - 1987 (funded).

Fellow. Tenth US Seminar on the Epidemiology and Prevention of Cardiovascular Diseases. American Heart Association. 1984 (funded)

CURRENT PROFESSIONAL/ADMINISTRATIVE APPOINTMENTS:

Director. Southwest Center for Occupational and Environmental Health (a NIOSH Education and Research Center). July 1997 - present.

Principal Investigator and Director. International Occupational and Environmental Health Training Program (a NIEHS/Fogarty International Center/NCEH/NIOSH International Training Center). 1995 - present.

Associate Director. Occupational Medicine Program. Southwest Center for Occupational and Environmental Health. University of Texas-Houston Health Science Center School of Public Health. October 1998 - present.

Principal Investigator and Director. World Health Organization Collaborating Centre in Occupational Health. University of Texas Houston Health Science Center School of Public Health. April 1992 - present.

Medical Director. University of Texas Health Services clinic. September 1992 - present.

Associate Director. Occupational and Environmental Medicine Residency Program. University of Texas - Houston Health Science Center School of Public Health. October 1998 - present.

Co-Director. Joint University of Texas/Baylor College of Medicine Combined General Internal Medicine/Occupational Medicine Residency Training Track. 1995 - present.

Consulting physician. Respiratory Consultants of Houston, P.A. January 1993 - present.

Consulting Medical Director. Texas Children's Hospital Employee Health Services. June 1988 - present

Co-Director. NIOSH-Approved Spirometry Technician Certification Course #91 April 1989 - present

RELEVANT WORK EXPERIENCE (including past appointments):

Deputy Director. Southwest Center for Occupational and Environmental Health (a NIOSH Education and Research Center). January 1993 - June 1997.

Director. Occupational and Environmental Medicine Residency Program. University of Texas - Houston Health Science Center School of Public Health. January 1993 - September 1998.

Co-Director. Occupational Medicine Residency Program. University of Texas School of Public Health. January 1993 - August 1993.

Associate Director. Occupational Medicine Residency Program. University of Texas School of Public Health. May 1989 - December 1992.

Physician (private practice). Respiratory Consultants of Houston. October 1988-January 1993.

Lecturer. Southwest Center for Occupational and Environmental Health Continuing Education Program. 1989 - present

Smoking Cessation Program. Creative Health Resources, Inc. July 1987 - December 1991.

Medical Operations Consultant (Astronaut Fitness Standards). NASA/Johnson Space Center. 1994 - present.

Medical Consultant. OMI
August 1988 - present

Consulting Medical Advisor. Union Texas Petroleum. September 1997 – December 1998.

Lecturer in Occupational Medicine. University of Texas School of Public Health at Houston.
July 1987 - March 1989.

Physician. Tuberculosis Control. Texas Department of Health.
July 1985 - June 1988

Physician. Harris County Hospital District Immunological Disorders Clinic.
January 1987 - June 1988

Lecturer. National Institute for Occupational Safety and Health (NIOSH) - approved Spirometric Technician Certification Course #21. Director: R. Keith Wilson, M.D.
June 1988 - March 1989

Medical Consultant. City of Bellaire.
1988 - 1994.

Technical consultant on occupational health research methodology. Pan American Health Organization. Maracay, Venezuela.. February 22 - 28, 1991

Lecturer. Department of Industrial Engineering
University of Houston
1991 - present.

Technical consultant. NIOSH/CDC. Evaluation and design criteria for antineedlestick safety devices. Atlanta, GA: August 10-11, 1994.

INTERNAL COMMITTEE MEMBERSHIPS (UNIVERSITY OF TEXAS-HOUSTON):

Chair. Physical Safety Committee. University of Texas-Houston Health Science Center. 1995-present.

Vice-Chair. Chemical Safety Committee. University of Texas-Houston Health Science Center. 1995-present.

Member. Committee for the Protection of Human Subjects. University of Texas-Houston Health Science Center. 1998-present.

Member (Epidemiology Discipline representative). Admissions Committee. School of Public Health. University of Texas-Houston Health Science Center. 1995-present.

Member. Dallas SPH Satellite Faculty Search Committee. University of Texas-Houston School of Public Health. November 1997-present.

Member. Continuous Quality Improvement Committee. University of Texas Health Services. 1993 - present.

Member. Faculty Peer Review Committee. School of Public Health. University of Texas-Houston Health Science Center. 1999.

Member. Ad Hoc Committee on Records Retention Policy. University of Texas-Houston School of Public Health. November 1999.

Member. Facility Master Plan User Group (Non-laboratory Research Space). University of Texas-Houston School of Public Health. April - August 1999.

Member. Biohazards Committee. University of Texas-Houston Health Science Center. 1992-1995.

Member. Infectious Diseases Review Panel. University of Texas-Houston Health Science Center. 1992-1995.

Member. Faculty Peer Review Committee. School of Public Health. University of Texas-Houston Health Science Center. 1994.

Member. Continuous Quality Improvement Committee on Environmental Health and Safety. 1994.

Chair. Occupational Medicine Faculty Search Committee. University of Texas-Houston Health Science Center School of Public Health. 1993 - 1995.

Chair. Environmental Sciences Faculty Search Committee. University of Texas-Houston Health Science Center School of Public Health. 1995 - 1996.

EXTERNAL COMMITTEE MEMBERSHIPS:

Member. World Health Organization Expert Advisory Panel on Occupational Health. September 1993 - present.

Member. Committee on Occupational Lung Disease. American College of Occupational and Environmental Medicine. 1995 - present.

Member. Residency Advisory Committee. General Preventive Medicine and Public Health Residency. Texas Department of Health. 1994 - present.

Member. Residency Advisory Committee. Occupational Medicine Residency. University of Texas Medical Branch in Galveston. 1997 - present.

Member. Speaker's Bureau. American Lung Association/San Jacinto Chapter. July 1987 - present

Steering Committee Member. Section on Occupational and Environmental Health. American College of Chest Physicians. 1992 - 1995.

Member. Resource Panel on Health, Environmental Effects and Technology. Texas Air Control Board. April 1989 - 1993.

Member. Committee on Worker's Compensation. Texas Medical Association. July 1990 - 1994.

Board of Directors. American Lung Association/San Jacinto Chapter. September 1991-1995.

Member. Occupational Lung Health Committee. American Lung Association/San Jacinto Chapter. August 1986 - June 1991.

Member. Environmental Health Committee, American Lung Association/San Jacinto Chapter. July 1988 - March 1991

EDITORIAL BOARDS/PEER REVIEWS:

Editorial Board. Journal "Salud de los Trabajadores". January 1993 - present.

International correspondent. Journal "Salud de los Trabajadores". November 1998-present.

Peer reviewer. Journal "Salud Pública de México". 1999-present.

Peer reviewer. CHEST/American College of Chest Physicians. 1993 - present.

Peer reviewer. Journal of Occupational and Environmental Medicine. 1995.

Peer reviewer. European Respiratory Journal. 1995.

Peer reviewer. NIOSH Training Programs and Educational Resource Centers. 1992 - present.

Peer Reviewer. NIOSH Special Emphasis Panel on Training Programs and Educational Resource Centers. February 1997.

Peer reviewer. NIOSH Study Section. September 1995.

Peer reviewer. NIOSH Study Section. November 1996.

Peer reviewer. NIEHS Ad Hoc Study Section. June 1999.

Peer reviewer. NIOSH/NORA Study Section. August 1999.

Peer reviewer. Texas Workers' Compensation Insurance Fund. 1994-present.

Peer reviewer. American Institute of Biological Sciences, Scientific Peer Advisory and Review Services. January 2000.

PROFESSIONAL SOCIETY MEMBERSHIPS:

Il.lustre Colegi Oficial de Metges de la Provincia de Tarragona (Spain). 1981 - present.

Harris County Medical Society. 1988 - present.

Texas Medical Association. 1988 - present.

American Medical Association. 1989 - present.

American College of Chest Physicians

Affiliate: 1986 - 1991.

Fellow: 1991 - present.

American Thoracic Society. 1987 - present.

American College of Occupational and Environmental Medicine. 1989-present.

American Public Health Association. 1991 - present.

Board of Directors. Hispanic American Medical Association of Houston. 2000-2002.

Association of Hospital Employee Health Programs. 1992 - 1995.

Spanish Society of Occupational Medicine Specialists.
1991 - present.

Societat Catalana d'Higiene i Medicina del Treball. 1993 - present.

Society of Occupational and Environmental Health. 1997-present.

PUBLICATIONS:

Refereed journals and publications:

Pratt CM, Delclos G, Wierman AM, et al., "The changing baseline of complex ventricular arrhythmias: a new consideration in assessing long-term antiarrhythmic drug therapy". New England Journal of Medicine 1985; 313: 1444-9.

Delclos G, Davila F. "Thrombolytic therapy for pulmonary embolism in pregnancy". American Journal of Obstetrics and Gynecology 1986; 155 (2): 375-376.

Delclos G, Flitcraft D, Brousseau K, Windsor N, Nelson D, Wilson RK, Lawrence EC. "Bronchoalveolar lavage analysis, gallium-67 lung scanning and soluble interleukin-2 receptor levels in asbestos exposure". Environmental Research 1989; 48:164.

Delclos G, Buffler PA, Greenberg SD, Key MM, Perrotta DM, Alexander C, Wilson RK. "Asbestos-associated diseases: a review" Texas Medicine 1989; 85:50.

Delclos G, Wilson RK, Bradley BL. "The influence of smoking on radiographic profusion and pleural changes in referred asbestos- exposed subjects". Journal of Occupational Medicine 1990;32:577.

Collaborator. "Silicosis:cluster in sandblasters - Texas, and Occupational Surveillance for silicosis". Morbidity and Mortality Weekly Report. 1990;39(25):433.

Rothstein M, Cooper S, Warneke C, Austin A, Craig SG, Kohlase JE, Palumbo M, Bollom D, Burau K, Delclos G, Fletcher D, Garcia K, Parker P, Whitehead L."Occupational illness and injury in Texas. Report to the Texas Legislature". University of Houston Health Law and Policy Institute: March 1993.

Cooper SP, Downs T, Burau K, Buffler PA, Tucker S, Whitehead L, Wood S, Delclos G, Huang B, Davidson T, Key M. "A survey of keratoses among paraquat production workers and a nonexposed friend reference group". American Journal of Industrial Medicine 1994;25:335-47.

Delclos G. "Función respiratoria en trabajadores con exposición combinada a asbesto y tabaco". Salud de los Trabajadores 1995;3:51-57.

Gershon, RRM, Vlahov D, Felknor SA, Vesley D, Johnson PC, Delclos GL, Murphy LR. "Compliance with universal precautions among health care workers at three regional hospitals". American Journal of Infection Control 1995;23:225-236.

Wu X, Delclos GL, Annegers JF, Bondy ML, Henry B, Hsu, TC, Spitz MR. "A case-control study of wood dust exposure, mutagen sensitivity and lung cancer risk". Cancer Epidemiology, Biomarkers and Prevention 1995;4:583-588.

Pladevall-Vila M, Delclos GL, Varas C, Guyer H, Bruges-Tarradellas J, Anglada-Arisa A. "Controversy of oral contraceptives and risk of rheumatoid arthritis. Meta-analysis of conflicting studies and review of conflicting meta-analyses with special emphasis on analysis of heterogeneity". American Journal of Epidemiology 1996;144:1-14.

Wu X, Spitz MR, Delclos GL, Connor TH, Siciliano MJ, Hsu TC. "Survival of cells with bleomycin-induced chromosomal lesions in the cultured lymphocytes of lung cancer patients". Cancer Epidemiology, Biomarkers and Prevention 1996;5:527-532.

Delclos GL. "Respiratory hazards of health-care workers". Pulmonary and Critical Care Update 1996;11:1-8.

Lawrence LW, Felknor SA, Johnson PC, Frankowski R, Cooper SP, Davidson A, Delclos GL. "The effectiveness of a needleless intravenous connection system: an assessment by injury rate and user satisfaction". Infection Control and Hospital Epidemiology 1997; 18: 175-182.

Michalsen A, Delclos GL, Felknor SA, Davidson AL, Johnson PC, Vesley D, Murphy LR, Kelen GD, Gershon RRM. "Compliance with universal precautions among physicians". Journal of Occupational and Environmental Medicine 1997; 39: 130-137.

Kelly NR, Kirkland RT, Holmes SA, Delclos G, Kozinetz CA. "Assessing parental utilization of the poison center: an emergency center-based survey". Clinical Pediatrics 1997; 36: 467-473.

Wu X, Shi H, Jiang H, Kemp B, Hong WK, Delclos GL, Spitz MR. "Associations between cytochrome P4502E1 genotype, mutagen sensitivity, cigarette smoking and susceptibility to lung cancer". Carcinogenesis 1997; 18: 967-973.

Bureau KD, Huang B, Whitehead LW, Delclos GL, Downs TD. "A system linking occupational history questionnaire data and magnetic field monitoring data". Journal of Exposure Analysis and Environmental Epidemiology 1998;8:231-252.

Zarr R, Heitman E, Delclos G, Dinh TA, Kerr G. "Tuberculosis in the state of Texas: issues and problems in surveillance". Texas Medicine 1998; 94(8): 50-56.

Co-author. "ACOEM Guidelines for protecting health care workers against tuberculosis". Report of the ACOEM Committee on Occupational and Environmental Lung Disorders. Journal of Occupational and Environmental Medicine 1998; 40: 765-767.

Huai L, Bondy ML, Langford LA, Hess KR, Delclos GL, Wu X, Chan W, Pershouse MA, Yung WKA, Steck PA. "Allelic deletion analyses of MMAC/PTEN and DMBT1 loci in gliomas: relationship to prognostic significance". Clinical Cancer Research 1998; 4: 2447-2454.

Emery R, Delclos G, Cooper SP, Hardy R. "Evaluating the relative status of health and safety programs for minority academic and research institutions". American Industrial Hygiene Association Journal 1998; 59: 882-888.

Delclos GL, Felknor SA, Morandi MT, Schulze LJ, Sánchez Tovar L, Yanes, L. "The role of information dissemination in sustainability of international partnerships". International Journal of Occupational and Environmental Health 1999; 5: 203-208.

Felknor SA, Aday, LA, Bureau K, Delclos G, Kapadia AS. "Assessment of safety climate and its association with injuries and safety practices in public hospitals in Costa Rica". International Journal of Occupational and Environmental Health [in press].

Lin H, Steck PA, Langford LA, Kyritsis AP, Wu X, Delclos GL, Chan W, Yung WKA, Levin VA, Bruner JM, Bondy ML. "Molecular epidemiologic study of expression of p53, p16, and Rb and glioma risk". Cancer Research [submitted].

Lin H, Steck PA, Langford LA, Kyritsis AP, Wu X, Delclos GL, Chan W, Yung WKA, Levin VA, Bruner JM, Bondy ML. "Association between LOH around MMAC/PTEN and family history of cancer, smoking status, exposure to radiation, and previous cancer history in patients with glioma". Cancer Epidemiology, Biomarkers and Prevention [submitted].

Co-author. "Spirometry in the occupational setting". Report of the ACOEM Committee on Occupational and Environmental Lung Disorders. Journal of Occupational and Environmental Medicine [in preparation].

Kumendia TO, Blasdel T, Delclos G, Goodwin B, Chappell CL. "Balantidiosis outbreak in an animal research center" [in preparation].

Schabath MB, Wu X, Delclos GL, Spitz MR. "Genetic variants in myeloperoxidase (MPO) and lung cancer risk in Caucasians" [in preparation].

Technical reports and proceedings:

Delclos G. "A descriptive study of asbestos-exposed subjects referred for independent medical examination". M.P.H. thesis. The University of Texas Health Science Center at Houston, School of Public Health. May 1988.

Tan M, Degioanni J, Davis J, Weir F, Wilson RK, Calkins D, Lam C, Coleman M, Pierson D, Delclos G, Casar G, Brown R, Summerhill S, King K. "Effects on humans of inhalation of 1% Halon 1301 for twenty-four hours." National Aeronautics and Space Administration. August 1989.

Delclos G, Wilson RK, Bradley BL. "Interobserver variability using the 1980 ILO Classification in referred asbestos workers". Proceedings of the VIIth International Pneumoconiosis Conference. U.S. Department of Health and Human Services (NIOSH) Pub. 90-108:960.

Cooper S, Downs T, Burau K, Tucker S, Whitehead L, Delclos G, Key M, Huang B, Davidson T, Buffler P. "A survey of keratoses among paraquat production workers and a nonexposed friend reference group". Proceedings of the 9th International Symposium in Epidemiology in Occupational Health. International Commission on Occupational Health. Cincinnati, Ohio: Sept. 23-25, 1992.

Delclos G. "Formación y ejercicio de la medicina ocupacional en Estados Unidos: 1993". Proceedings of the Third National and First Ibero-American Congress on Occupational Medicine and Hygiene at Work. Valladolid, Spain: June 1993.

Delclos GL, Burau KD, Carson AI, Felknor SA, Morandi MT, Guevara E, Murray K. "Estudio transversal de trabajadores con exposicion potencial a hidrocarburos aromaticos". Pan American Health Organization: July 1996.

Collaborator on the WHO Document "A global strategy towards health at work", prepared by the Network of WHO Collaborating Centres in Occupational Health in Beijing, China. October 11-14, 1994.

Collaborator. NIOSH Technical Report on Design, Selection, Evaluation and Placement of Sharps Containers. NIOSH/DHHS 1997, Publ. 97-111.

Collaborator. MSHA/NIOSH: "Una guía para trabajar sin peligro con sílice". 1997.

Collaborator. MSHA/NIOSH: "Claves para la prevención de la silicosis". 1997.

Delclos GL, Bright K, Carson AI, Felknor SA, Mackey T, Morandi M, Schulze LJH, Whitehead LW. "Global survey of occupational health competencies and curriculum". Environmental Health Programme/World Health Organization (in preparation).

Book chapters and audiovisual publications:

Delclos GL, Burau KD, Carson AI, Felknor SA, Morandi MT, Guevara E, Murray K. "Estudio de las condiciones generales de salud de los trabajadores en plantas del Complejo Industrial de Barrancabermeja", In: Mendes R (ed). La Búsqueda de la Salud Ocupacional en la Industria del Petróleo Colombiana: Informe Técnico-Científico del Proyecto SOIP. Sociedad Colombiana de Medicina del Trabajo (in preparation).

Carson A and Delclos G. "Pulmonary anatomy and physiology". In: Perkins J (ed). Modern Industrial Hygiene. Volume II: Control of Chemical Agents (in preparation).

Delclos G and Holland V. "Medical aspects of respirator use". In: Perkins J (ed). Modern Industrial Hygiene. Volume II: Control of Chemical Agents (submitted).

Delclos i Clanchet J, Pons i Rafols JM, Jordi i Gonzalez R. "El doctor Soler i Cañellas". In: Sánchez Ripollés JM (ed.). Col·legi Oficial de Metges de Tarragona: Una Historia de Cent Anys (1898-1998). Col·legi Oficial de Metges de Tarragona 1998.

Delclos G and Carson A. "Acute gaseous exposure". In: Balmes J, Harber P, Schencker M (eds). Occupational and Environmental Respiratory Diseases. Mosby 1995.

"Si es sílice, es más que un simple polvo". U. S. Mine Safety and Health Administration: 1997 [Technical translation into Spanish].

Dellinger RP, Delclos G. "Fiberoptic bronchoscopy in the intensive care setting". Masters in Medicine (an educational video series sponsored by Glaxo Pharmaceutical): 1987.

Stoll B. "Host factors in breast cancer", Vols 1,2; E.B. Saunders & Co.: 1977. [Technical translation into Spanish].

"Diabetes", Endocrine Clinics; E.B. Saunders & Co.: 1977. [Technical translation into Spanish].

"Cancer of the GI tract", Gastroenterology Clinics; E.B. Saunders & Co.: 1978. [Technical translation into Spanish].

"The Larynx and Trachea", Radiological Clinics of North America; E.B. Saunders & Co.: 1978. [Technical translation into Spanish].

"Advances in Uroradiology", Radiological Clinics of North America; E.B. Saunders & Co.: 1979. [Technical translation into Spanish].

"Anesthetic considerations in setting up a new medical facility", International Anesthesiology Clinics; Little, Brown & Co.: 1981. [Technical translation into Spanish].

Hurst, J.W. "The Heart"; McGraw-Hill; 3rd ed.: 1978. (In collaboration with the Cardiology Service, Hospital Clinic i Provincial; Barcelona, Spain). [Technical translation into Spanish].

Abstracts:

Pratt CM, Wierman AM, Delclos G, et al., "Is it valid to assume baseline arrhythmia frequency remains stable during long-term drug therapy?" Journal of American College of Cardiology 1985; 5 (2): 463.

Pratt CM, Wierman AM, Slymen D, Delclos G, et al., "Routine transtelephonic ECG versus Holter monitoring in arrhythmia follow-up". Chest 1986; 89 (6): 476S.

Delclos G, Flitcraft D, Brousseau K, Rodriguez T, Wilson RK, Lawrence EC. "Gallium-67 lung scanning and bronchoalveolar lavage in asbestosis". American Review of Respiratory Disease. 1987; 135 (4):A22.

Casar G, Delclos G, Bloom K, Gorin AB. "Oxygen consumption and delivery changes during aortic surgery". American Review of Respiratory Disease 1987; 135 (4): A435.

Delclos G, Wilson RK. "Pleural plaques and respiratory function in referred asbestos workers". American Review Respiratory Disease 1988; 137:A95.

Delclos G, Wilson RK, Bradley BL. "Smoking and radiographic profusion in referred asbestos workers". Chest 1988; 94:595.

Delclos G, Wilson RK, Teague R, Bloom K, Casar G, Berger M, Bradley B. "Pulmonary function profile of asbestos-exposed subjects with combined interstitial fibrosis and chronic airway obstruction". Chest 1989; 96:173S.

Gutierrez L, Delclos G. "Quality of life in metastatic breast cancer patients undergoing chemotherapy: an information synthesis". Spanish National Oncology Congress. Madrid, Spain. 1993.

Gershon R, Felknor S, Delclos G. "Compliance Factors Associated with Universal Precautions". National Conference on Human Retroviruses and Related Infections. 1994.

Chamberland M, Culver D, Henry K, Gerberding J, Mendelson M, Campbell S, Delclos G, McKibben P, Srivastava P and Bell D. "Underreporting of needlestick injuries among health-care workers". Fourth Annual Meeting of the Society for Hospital Epidemiology of America. New Orleans, LA. 1994.

Miller CC, Delclos GL, Frankowski RF, Labarthe DL. "Joint effects of pulmonary function and aerobic power on survival in a cohort of health adults". American Review of Respiratory Disease 1994;149:A521.

Delclos G, Johnson P, Felknor S, Lawrence L, Michalsen A, Kelen G and Gershon R. "Factors associated with non-compliance with universal precautions among physicians". Tenth Annual Meeting of the International Society for Technology Assessment in Health Care. Baltimore, MD. 1994.

Felknor SA, Lawrence LW, Johnson PC, Delclos GL. "The use of healthcare worker-based focus groups to select and evaluate safety devices". Occupational Risks and Prevention. Paris, France. 1995.

Felknor SA, Lawrence LW, Johnson PC, Delclos GL. "Selection and evaluation criteria for anti-needlestick devices". Frontline Healthcare Workers: National Conference on Prevention of Sharps Injuries and Bloodborne Exposures. Washington, D.C. 1995.

Lawrence LW, Felknor SA, Johnson PC, Frankowski R, Davidson A, Delclos GL. "Effectiveness of a needleless system in two hospitals". Fifth Annual Meeting of the Society for Healthcare Epidemiology of America. San Diego, CA. 1995.

Lawrence LW, Felknor SA, Johnson PC, Frankowski R, Davidson A, Delclos GL. "Effectiveness of a needleless system in two hospitals". Frontline Healthcare Workers: National Conference on Prevention of Sharps Injuries and Bloodborne Exposures. Washington, D.C. 1995.

Morandi MT, Delclos G, Murray K, Carson A, Felknor S, Guevara E. "Personal exposures to BTX and post-shift concentrations of selected biomarkers for a group of petrochemical workers in South America". Society for Risk Analysis/International Society for Exposure Assessment Annual Meeting. December 1996.

LaCour F, Elk R, Grabowski J, Rhoades J, Mackey T, Delclos G. "Contingency management interventions in the treatment of cocaine-dependent patients infected with tuberculosis". NIDA Research Monograph, Problems of Drug Dependence. Proceedings of the 58th Annual Scientific Meeting, College on Problems of Drug Dependence, Inc.: 1996.

Michalsen A, Delclos GL. "Enhancing infection prevention among anesthesiologists". PGA Congress, New York City: 1996.

Huang B, Burau KD, Whitehead LW, Delclos G, Downs TD. "Leukemia and occupational exposure to electromagnetic fields: an incident-case-control study". 31st Annual Meeting of the Society for Epidemiologic Research.

Delclos J, Felknor S, Lawrence L. "Combinación de la investigación epidemiológica con métodos participativos en la salud ocupacional del sector sanitario". Jornadas Intercongreso "Mujer y Trabajo". October 7-9, 1999. Oviedo, Spain [accepted].

Maberti S, Morandi M, Carson A, Delclos G. "Evaluation of urinary trans,trans muconic and S-phenylmercapturic acids as biomarkers of exposures to benzene. [submitted]

Lerner S, Felknor S, Delclos G, Jalayer A, Honess-Morreale L. "Design and implementation of a longitudinal bladder cancer screening program in a defined cohort exposed to beta-naphthylamine". [submitted]

FUNDED GRANTS:

Co-investigator. "A study to assess the prevalence of keratoses in an industrial population". Principal investigator: Sharon Cooper, Ph.D. 10/1/90 to 8/31/92. Funded by ICI, Inc.: \$329,894.

Principal investigator. "Selection and evaluation criteria for sharps containers". 10/1/91 to 9/30/92. Funded by NIOSH/ERC, Inc.: \$46,000.

Co-investigator. "Occupational illness and injury in Texas". Principal investigator: Mark Rothstein, J.D. 11/1/91 to 3/31/93. Funded by the Texas State Legislature as a subcontract with the University of Houston Health Law and Policy Institute: \$30,000.

Principal investigator. "Effectiveness of hospital-wide implementation of a needleless system". 10/1/92 to 12/31/94. Funded by NIOSH/ERC, Inc.: \$46,437.

Principal investigator. "Evaluation criteria for anti-needlestick devices". 10/1/92 to 9/30/94 (Year 2). Funded by NIOSH/ERC, Inc.: \$40,570.

Site Principal investigator. "Multi-site hospital surveillance of blood contacts". 10/1/92 to 1/31/94. Subcontract to Ramsey Foundation, project in turn funded by CDC.: \$53,447 (Texas site).

Site Principal investigator. "Compliance factors associated with universal precautions". 10/1/91 to 9/30/96. Funded by NIOSH/ERC, Inc. through a subcontract with the Johns Hopkins University: \$55,000 (approximately).

Co-principal investigator. "The natural history of chronic beryllium disease". 6/1/93 to 5/31/94. Funded by Brush Wellman, Inc.: \$13,000 (approximately).

Co-investigator. "Reducing cocaine use and increasing tuberculosis treatment compliance". Principal investigator: Ronith Elk, Ph.D., University of Texas Mental Sciences Institute. 7/1/94 to 6/30/97. Funded by National Institutes of Health: \$1,289,097.

Principal investigator. "User acceptance of anti-needlestick devices in hospitals". 10/1/94 to 3/31/96. Funded by NIOSH/ERC, Inc.: \$55,375.

Principal investigator. "Survey of risk and prevention strategies for hospital CPR". 10/1/94 to 3/31/96. Funded by NIOSH/ERC, Inc.: \$52,895.

Principal investigator. "Patterns of percutaneous injury after the OSHA standard". 10/1/94 to 3/31/96. Funded by NIOSH/ERC, Inc.: \$50,172.

Principal investigator. "A cross-sectional health study of petroleum refinery workers in Colombia". 12/29/95 to 7/31/96. Funded by PAHO/WHO: \$420,000.

Principal investigator and Director. Training grant in international occupational and environmental health. 9/1/95 to 8/31/2000. Funded by Fogarty International Center/NIEHS/NIOSH: \$691,532 (eligible for competing renewal).

Principal investigator and Director. Southwest Center for Occupational and Environmental Health (NIOSH Education and Research Center). 7/1/98 to 6/30/99. Funded by NIOSH: \$430,596 (eligible for competing renewal).

Principal investigator. "International training guidelines in occupational health". 5/1/98 to 9/30/98. Funded by the World Health Organization: \$10,000.

Principal investigator. "Bladder cancer screening program". 5/15/98 to 5/14/2001. Funded by Phillips Petroleum Company: \$4,019,150 (eligible for noncompeting renewal).

CURRENT AREAS OF RESEARCH INTEREST:

1. International occupational health.
2. Occupational and environmental respiratory diseases.
3. Occupational hazards of healthcare workers.
4. Molecular epidemiology and occupational exposures.
5. Environmental risk factors and childhood asthma.

SELECTED PRESENTATIONS:

1987 Texas Thoracic Society Meeting. "Gallium-67 lung scanning and bronchoalveolar lavage in asbestosis". San Antonio, TX 4/4/87.

1987 Texas Thoracic Society Meeting. "Oxygen consumption and delivery changes during aortic surgery". San Antonio, TX 4/4/87.

1987 Annual Meeting of the American Thoracic Society. "Gallium-67 lung scanning and bronchoalveolar lavage in asbestosis". New Orleans, LA 5/10/87.

1988 Texas Thoracic Society Meeting. "Effects of chronic exposure to high-grade talc on respiratory function". Austin, TX 4/9/88.

"Asbestos exposure and respiratory function". National Meeting on Occupational Lung Disease. Baylor College of Medicine. Houston, TX 4/23/87.

1988 Annual Meeting of the American Thoracic Society. "Pleural plaques and respiratory function in referred asbestos workers". Las Vegas, NV 5/8/88.

VIIth International Conference on the Pneumoconioses. "Interobserver variability using the 1980 ILO Classification in asbestos-exposed subject referred for compensation evaluation." Pittsburgh, PA 8/26/88.

1988 Annual Scientific Assembly of the American College of Chest Physicians. "Smoking and radiographic profusion in referred asbestos workers." Anaheim, CA 10/6/88.

Basic curricula in Occupational Medicine. American Occupational Health Association. San Antonio, TX 10/22/88.

"Introduction to Occupational Lung Disease". Region IV Education Service Center. Houston, TX 10/18/88.

The Pathology of Occupational Lung Disease: An Update. "Asbestos-Associated Disease: An update for the primary physician". Baylor College of Medicine. Houston, TX 5/19/89.

1989 Annual Scientific Assembly of the American College of Chest Physicians. "Pulmonary function profile of asbestos-exposed subjects with combined interstitial fibrosis and chronic airway obstruction." Boston, MA 11/2/89.

Director. Postgraduate Seminar on Occupational Lung Disease, Parts I and II. American Occupational Health Conference. Houston, Texas. 4/30/90 - 5/1/90.

Director. Workshop on Occupational Health Research in Latin America. Pan American Health Organization. Houston, Texas. 11/5/91 - 11/8/91.

"Update on activities of the WHO Collaborating Centre for Occupational Health in Texas". First meeting of WHO Collaborating Centres. Moscow, Russia. 9/6/92 - 9/13/92.

Seminar in Epidemiology: Case-control studies.
Instituto Tecnológico de Estudios Superiores de Monterrey. Monterrey, Mexico. 10/2/92 - 10/3/92.

Keynote Speaker. Annual Conference in Occupational Health. Coimbra, Portugal. "Video display terminals and occupational health: a systematic approach to evaluation". November 1992.

"Update on occupational respiratory disease". Texas Medical Association Annual Scientific Meeting. Houston, Texas. 5/14/93.

"Environmental Cancer Risks". Texas Medical Association Continuing Education Program. McAllen, Texas. 5/20/93.

"The practice of occupational medicine in the United States". Third Spanish National and First Ibero-American Congress on Occupational Medicine. Valladolid, Spain. 6/11/93.

"Spirometry Update: 1993". Annual Occupational Medicine Update. Deep South Center for Occupational Health and Safety. Destin, Florida. 9/17/93.

"Acute inhalation injury". Societat Catalana de Higiene i Medicina del Treball. Barcelona, Spain. 10/5/93.

"Occupational Respiratory Disease". Occupational Health Unit, Universidad de Carabobo. Maracay, Venezuela. 10/11/93 - 10/15/93 and annually thereafter.

Mackey T, Lindenberg J, Delclos G. "Interdisciplinary primary care, occupational health and health promotion within student and employee health services". Prevention '93. St. Louis, Missouri. April 1993.

Mackey T, Lindenberg J, Delclos G. "Interdisciplinary primary care, occupational health and health promotion". American Health Association Annual Meeting. Baltimore, Maryland. June 1993.

"Respiratory Hazards of Healthcare Workers". Annual Scientific Assembly of the American College of Chest Physicians. Orlando, Florida. 10/25/93.

"Respiratory hazards in health care workers". UCLA Occupational and Environmental Medicine Seminar. Los Angeles, CA. 4/12/94.

"Tuberculosis and OSHA". Gulf Coast Chapter of the American Industrial Hygiene Association, Houston, TX. 7/21/94.

Delclos G and Carson A. "A university-based pulmonary function surveillance project". Second Meeting of the WHO Collaborating Centres for Occupational Health. Beijing, China. 10/11-14/94.

Co-Chair. "The dusty trades". Annual Scientific Assembly of the American College of Chest Physicians, New Orleans, LA. 10/30/94.

Seminar lecturer. "Overview of Environmental Health". Continuing Education Program. Southwest Center for Occupational and Environmental Health/U.S. Environmental Protection Agency. El Paso, TX; Laredo, TX and Harlingen, TX. January - March 1995.

Chair. "Occupational health in developing countries: what's our role?". American Occupational Health Conference, Las Vegas, NV. 5/4/95.

"The role of academic institutions in international occupational health". American Occupational Health Conference, Las Vegas, NV. 5/5/95.

"Assessment of impairment from occupational respiratory diseases". Congress of the Medical Society of Maracaibo, Maracaibo, Venezuela. 7/26/95.

"Respiratory diseases caused by exposure to organic agents". Congress of the Medical Society of Maracaibo, Maracaibo, Venezuela. 7/26/95.

Seminar Director. "Radiology of occupational lung diseases". American Occupational Health Conference. San Antonio, TX. 5/2/96.

Course Director. "Salud Ocupacional en Trabajadores del Sector-Terciario". Comisiones Obreras/Caja de Asturias/Continuing Education Program. Southwest Center for Occupational and Environmental Health. Oviedo, Spain. November 1995.

"An overview of occupational health for managers". Virginia Indonesia Oil Company. Jakarta and Balikpapan, Indonesia. January 1996.

Course Director. "Occupational Medicine for the Primary Care Practitioner". Continuing Education Program. Southwest Center for Occupational and Environmental Health. Houston, TX. April 1996, March 1997, March 1998 (Part I) and September 1996, September 1997 (Part II), November 1998 (Part II).

Seminar Director and Lecturer. "Assessing impairment and disability from occupational asthma". American Occupational Health Conference. Boston, MA. 4/29/98.

"Medical aspects of respiratory protection: 1998 update". NASA/Johnson Space Center Occupational Health Department. 5/13/98.

"Occupational asthma: 1998 update". St. Luke's Episcopal Hospital/Baylor College of Medicine Dept. of Medicine Grand Rounds. 5/18/98.

"The role of information dissemination in sustainability of international collaborative programs. International Environmental and Occupational Health: Creating Global Linkages. National Institutes of Health. 10/21/98.

Felknor S, Delclos G, Aday LA, Burau K. "Survey of safety climate in Costa Rican Public Hospitals in 1997. Poster presentation at International Environmental and Occupational Health: Creating Global Linkages. National Institutes of Health. 10/21/98.

Delclos G, Felknor S, Morandi, M, Schulze, L. "University of Texas International Training and Research in Occupational and Environmental Health Program". Poster presentation at International Environmental and Occupational Health: Creating Global Linkages. National Institutes of Health. 10/21/98.

"Asthma in the Workplace". Occupational Medicine for Primary Care: Clinical Update. Continuing Education Program. Southwest Center for Occupational and Environmental Health. Houston, TX: November 7-8, 1998.

Kumenda TO, Blasdel T, Delclos G, Goodwin B, Chappell C. "Balantidiosis outbreak in an animal research center". University of Texas-Houston School of Public Health Student Research Day. Houston, TX: November 6, 1998.

"Occupational hazards of healthcare workers: 1998 update". Grand Rounds. University of Texas - Houston Department of Obstetrics and Gynecology. November 10, 1998.

Bright K, Carson C, Delclos G, Felknor S, Mackey T, Morandi M, Schulze L, Whitehead L. "International perspectives on competencies and curriculum in occupational health nursing". International Occupational Health and Environmental Health Nursing Conference. Eastbourne, United Kingdom. November 13, 1998.

AWARDS:

Dupont Young Investigator Award (Occupational and Environmental Health). Presented at the 1988 Annual Scientific Assembly of the American College of Chest Physicians, Anaheim, CA. October 1988.

Dupont Young Investigator Award (Occupational and Environmental Health). Presented at the 1989 Annual Scientific Assembly of the American College of Chest Physicians, Boston, MA. November 1989.

Honorary Member. Sociedad Catalana d'Higiene i Medicina del Treball. 1993 - present.

Peer Recognition for Outstanding Scholarship. University of Texas Houston Health Science Center Honors Convocation. October 1994.

Peer Recognition for Outstanding Scholarship. University of Texas Houston Health Science Center Honors Convocation. October 1995.

Peer Recognition for Outstanding Scholarship. University of Texas Houston Health Science Center Honors Convocation. November 1996.

Peer Recognition for Outstanding Scholarship. University of Texas Houston Health Science Center Honors Convocation. November 1997.

Harriett Cunningham Award of Excellence. Texas Medicine Editorial Committee. August 1998.

Peer Recognition for Outstanding Scholarship. University of Texas Houston Health Science Center Honors Convocation. March 1999.

NO. 00-07550-D

RICHARD AMEY, et al.,

Plaintiffs,

vs.

GAF CORPORATION, et al.

Defendants.

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

95TH JUDICIAL DISTRICT

**DEFENDANTS CELANESE LTD., CNA HOLDINGS, INC.
AND CELANESE CHEMICALS, INC.'S CERTIFICATE OF WRITTEN DISCOVERY**

I, Erica Meadough, counsel for Defendants Celanese Ltd., CNA Holdings, Inc. and Celanese Chemicals, Inc., certify that on the 19th day of December 2001, I served the following discovery by certified mail, return receipt requested, on the attorney of record for Plaintiffs:

- 1) Defendants Celanese Ltd., CNA Holdings, Inc. and Celanese Chemicals, Inc.'s First Supplemental Responses to Plaintiff's Rule 194 Requests for Disclosure.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

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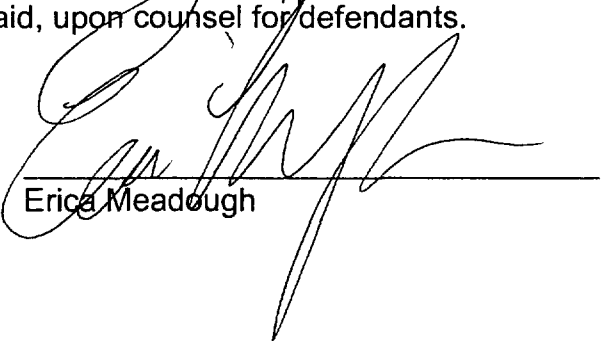
ATTORNEYS FOR DEFENDANTS
CELANESE LTD., CNA HOLDINGS, INC.
AND CELANESE CHEMICALS, INC.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via certified mail, return receipt requested, upon counsel for plaintiffs on this 19th day of December 2001, and by regular U.S. mail, postage prepaid, upon counsel for defendants.



Erica Meadough

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December 19, 2001

Mr. Jim Hamlin
Dallas County District Clerk
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600 Commerce Street, 1st Floor
Dallas, Texas 75202-4606

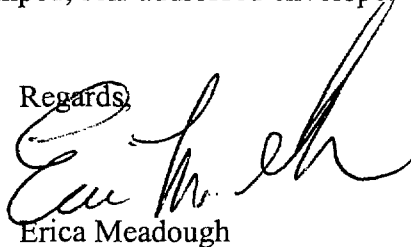
Re: *Richard Amey, et al. v. GAF Corporation, et al.*; Cause No. 00-07550-D, in
the 95th Judicial District Court, Dallas County, Texas

Dear Mr. Hamlin:

Enclosed for filing in the above-referenced matter, please find the original and one copy of Defendants Celanese Ltd., CNA Holdings, Inc. and Celanese Chemicals, Inc.'s **Certificate of Written Discovery** regarding their First Supplemental Responses to Plaintiff's Rule 194 Requests for Disclosure.

Please acknowledge filing of the above document by placing your file stamp on the copy provided and returning it to me in the enclosed stamped, self-addressed envelope. Thank you for your assistance in this matter.

Regards,

A handwritten signature in black ink, appearing to read "Erica Meadough", written over the typed name.

Erica Meadough

EMG:sj
Enclosures

cc: All Known Counsel of Record