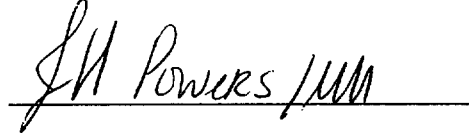


197TH JUDICIAL DISTRICT

CERTAINTEED CORPORATION, DANA CORPORATION, QUIGLEY
COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE
CHEMICALS AND PLASTICS, INC. supplements their responses to these Interrogatories,
Requests for Production and/or Discovery Requests and complies with any such Court Order
without waiving and subject to any prior objections to such Interrogatories, Requests for
Production, Discovery Requests and Court Order.

Respectfully submitted,

POWERS & FROST, L.L.P.

A handwritten signature in dark ink, appearing to read "JH Powers / JMF", is written over a horizontal line.

James H. Powers
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Sharla J. Frost
Texas State Bar No. 07491100
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ATTORNEYS FOR DEFENDANTS
CERTAINTEED CORPORATION,
DANA CORPORATION, QUIGLEY
COMPANY, INC. and UNION CARBIDE
CORPORATION D/B/A UNION
CARBIDE CHEMICALS AND
PLASTICS, INC.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument has been forwarded to counsel of record by certified mail, return receipt requested, overnight carrier and/or regular mail on the 27 day of September, 2001.

Mary Mori

Defendants CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC. supplements its responses to Interrogatories, Requests for Production, Discovery Requests and/or Court Order requiring disclosure of the identity and subject matter of testimony of expert witnesses as follows:

See CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC. 's witness list previously filed. See also CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC.'s designation of prior trial testimony previously filed.

1. In addition to the matters referred to in the witness list, Dr. Robert Ross, Dr. Scott G. Donaldson, Dr. Gregory Foster, Dr. George Delclos, Dr. Gail Stockman, Dr. Kathryn Hale, Dr. Mark Wick, and Dr. Phillip Cagle will testify about the medical condition of John H. Villarreal. A copy of any applicable reports, which provides the substance of the opinions and summary of the grounds for such opinions with respect to Plaintiff's medical conditions are attached as Exhibit "A".
2. In addition to the matter referred to in the witness list, Dr. Ross, Dr. Stockman, Dr. Hale, Dr. Donaldson, Dr. Foster, Dr. Delclos, Dr. Wick, and Dr. Cagle may testify regarding the medical conditions of the plaintiff based on review of medical records relating to the plaintiffs.
3. Dr. Hale is a specialist in the area of respiratory diseases. Dr. Hale will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Hale will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.
4. Dr. Ross is a specialist in the area of respiratory diseases. Dr. Ross will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Ross will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.

5. Dr. Donaldson is a specialist in the area of respiratory diseases. Dr. Donaldson will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Donaldson will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.
6. Dr. Foster is a specialist in the area of respiratory diseases. Dr. Foster will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Foster will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.
7. Dr. Delclos is a specialist in the area of respiratory diseases. Dr. Delclos will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; his opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; his prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Delclos will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.
8. Dr. Stockman is a specialist in the area of respiratory diseases. Dr. Stockman will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff's(s') medical records; any communications with the plaintiff(s) or plaintiff's(s') family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s) suffers from asbestos related disease and the basis of such opinion; the plaintiff's(s') current medical condition; her prognosis in regard to the plaintiff's(s') medical condition and/or plaintiff's(s') cause of death. Dr. Stockman will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically.
9. Dr. Cagle is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff(s) specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically.
10. Dr. Wick is a pulmonary pathologist. Based on his review of medical records, including pathology materials, he will testify about the plaintiff's(s') medical condition, and the cause of plaintiff's(s') medical condition. His testimony will also include a discussion of asbestos and

its effect on human health generally and plaintiff(s) specifically, and the effect that other substances have on human health generally and plaintiff's(s') condition specifically.

11. Plaintiff's(s') treating physician(s) will testify regarding evaluation, diagnosis and treatment of injuries and/or medical conditions incurred by plaintiff's(s') during his lifetime; will also testify regarding the effects of these illnesses and/or injuries on plaintiff's(s') life, general health, physical abilities and life expectancy. Treating physicians are listed in Exhibit "B".

Defendants CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC. supplements its Responses to Request for Production, Discovery Requests, and or Court Order requiring disclosure of the identity of persons having knowledge of relevant facts as follows:

See CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC.'s witness list previously filed. See also CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC. 's designation of prior deposition and trial testimony previously filed. See also Exhibit "C" for additional witnesses.

Further, CERTAINTED CORPORATION, DANA CORPORATION, QUIGLEY COMPANY, INC. and UNION CARBIDE CORPORATION D/B/A UNION CARBIDE CHEMICALS AND PLASTICS, INC. adopts the designations of prior deposition and trial testimony filed by all Defendants.

EXHIBIT "A"

EXHIBIT "B"

TREATING PHYSICIANS

1. [Any treating physician listed by Plaintiff or any co-Defendant.]

Plaintiff: John H. Villarreal

1. Dr. Leon Keeble – 525 Villa Maria Blvd., Brownsville, Texas 78520
2. Dr. Charles W. Zavala – 840 West Price Road, Brownsville, Texas 78520
3. Dr. Phillip G. Wright – 3 Ted Hunt Blvd., Brownsville, Texas 78521
4. Dr. Gerardo Trillo – 2150 West Expressway, 83, Brownsville, Texas 78521
5. Dr. Ramon F. Arguelles – 2150 West Expressway 83, Brownsville, Texas 78521
6. Dr. Carl Beller – 4 East LeVee, Brownsville, Texas 78520
7. Columbia Valley Regional Medical Center – 645 Villa Maria Blvd, Brownsville, Texas
8. South Texas Cancer Center – 2150 North Expressway, Brownsville, Texas

Any other physician or hospital designated by plaintiff

EXHIBIT "C"

FACT WITNESSES

PLAINTIFF'S CO-WORKERS

1. [Any co-worker listed by plaintiff or any co-defendant.]

Plaintiff: John H. Villarreal

Any other co-worker designated by plaintiff