

**BRUCE D. DAVIS and JAMES R. DAVIS,
Individually and as Personal Representatives
of the Heirs and Estate of FRANKIE GENE
DAVIS, Deceased, et al**

VS.

Defendants.

AT LAW NUMBER 3

EL PASO COUNTY, TEXAS

COMES NOW, Defendant Southwestern Bell Telephone Company ("SWBT") and pursuant to TEX. R. CIV. PRO. 193, 194, and 195, files these Supplemental Responses

(e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

1. **Ken Treuter**
(Address and Telephone Number unknown at this time).

Mr. Treuter is a former investigator for Baron & Budd ("B&B"). He may testify that his job duties included finding witnesses who could support claims of asbestos exposure by B&B plaintiffs. He will testify about B&B's methods for locating witnesses, specifically that ads are placed in newspapers asking former employees to call if they worked for a particular company or at a specific job site between the early 1940s and late 1970s. He may also testify regarding witness preparation methods used by B&B, specifically that witnesses are coached to name 20 or 30 different asbestos-containing products that are manufactured by companies B&B typically sues, and testify that those products were used at job sites where the plaintiff worked. He may