PLAINTIFF'S EXHIBIT

TEX-22

NO. 2000-2113

PABLO AGUILERA, ET AL.	§	IN THE COUNTY COURT
	§	
VS.	§	AT LAW NO. 3
	§	
GAF CORPORATION, ET AL.	§	EL PASO COUNTY, TEXAS

DEFENDANT TEXACO INC.'S EXHIBIT LIST

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant TEXACO INC. and hereby submits its trial exhibit list.

Respectfully submitted,

HAYS, McCONN, RICE & PICKERING

By: _____

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Attorneys for Defendant TEXACO INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to counsel for Plaintiff by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this 6 day of Sept, 2001.

_____
B. Stephen Rice

DEFENDANTS' TRIAL EXHIBITS IN ASBESTOS CASES

1.	Aug. 1938	Public Health Bulletin No. 241: A Study of Asbestosis in the Asbestos Textile Industry, by Dreessen, Dallavalle, Edwards, Miller, & Sayers
2.	Nov. 1945	"Maximum Allowable Concentrations of Industrial Atmosphere Contaminants", by Warner Cook
3.	Jan.-Nov. 1946	A "Health Survey of Pipe Covering Operations in Constructing Naval Vessels", in Journal of Industrial Hygiene & Toxicology, Vol. 28, by Walter Fleischer, Frederick Viles, Jr., Robert Gade, & Philip Drinker
4.	1947	"Clean Air: Removal of Dusts" issued by the US Dept. of Labor
5.	1948	"Industrial Hygiene & Toxicology", Vol. I, by Frank A. Patty
6.	June 25, 1952	West Virginia State Health Department's Report on Industrial Hygiene Survey, Chesapeake & Ohio Railroad Shops, by Paul D. Halley, John Peathas, Harvey J. Roberts, & James Monnison
7.	1955	"Mortality from Lung Cancers in Asbestos Workers" by Richard Doll
8.	Dec. 1, 1957	Occupational Health Regulations; Maximum Permissible Concentrations of Atmospheric Contaminants in Places of Employment from the Texas State Dept. of Health
9.	June 1958	"An Epidemiological Study of Lung Cancer in Asbestos Mines" by Braun and Truan
10.	1959	"Asbestos, a Materials Survey", by Oliver Bowles from the US Dept. of the Interior
11.	Feb. 15, 1960	Letter from Kenneth M. Lynch to F.W. Wilson on no knowledge of data on pleural mesothelioma being associated with asbestos dust exposure
12.	Apr. 1960	"Diffuse Pleural Mesotheliomas & Asbestos Exposure in the North Western Cape Province", by J.C. Wagner
13.	Jan. 14, 1961	"Diffuse Pleural Mesotheliomas in South Africa", by J.C. Wagner

14.	May 19, 1961	"Ad Hoc Meeting to Discuss the Status of Knowledge Concerning the Effects of Exposure to Asbestos Dust on Health", by U.S. Public Health Service
15.	1962	Documentation of Threshold Limit Values, by American Conference of Governmental Industrial Hygienists
16.	1964	"Occupational Diseases--a Guide to Their Recognition" by W.M. Gafafer
17.	1965	Annals of New York Academy of Sciences
18.	Sept. 1965	"Cancer Experiences of Several Occupational Groups Followed Prospectively," by John E. Dunn & John M Weir
19.	1966	Documentation of Threshold Limit Values, Revised edition, by American Conference of Governmental Industrial Hygienists
20.	Sept./Oct. 1966	"Measurement of Dust Exposures in the Asbestos Textile Industry", by Jeremiah R. Lynch & Howard E. Ayer
21.	Nov./Dec. 1967	"Testing Compliance with Threshold Limit Values for Respirable Dusts", by S.A. Roach, E.J. Baier, H.E. Ayer, & R.L. Harris
22.	Jan. 1968	"Measurement of Asbestos Exposure", by Jeremiah Lynch & Howard Ayer from the Journal of Occupational Medicine
23.	Jan. 1968	"Industrial Hygiene for Insulation Workers", by LeRoy Balzer from the Journal of Occupational Medicine
24.	Apr. 22, 1968	"Evaluation & Control of Asbestos Exposure in the Insulating Trade", by W. Clark Cooper & LeRoy Balzer
25.	May/June 1968	"Work Environment of Insulating Workers", by W. Clark Cooper & LeRoy Balzer
26.	July 1968	"A Prospective Study of Mortality of Several Occupational Groups: Special Emphasis on Lung Cancer," by Dr. John E. Dunn, Jr. & Dr. John M. Wier (from Arch. Environ. Health-Vol. 17)
27.	May 20, 1969	Federal Register: Safety & Health Standards, Part II, from the Department of Labor

28.	October, 1969	"Asbestos and Health in 1969" by George W. Wright from the American Review of Respiratory Disease
29.	1969-1970	Tables XIII & XIV: Asbestos Concentration by Operation for Insulation Workers from 'Appendix X' of NIOSH Criteria Doc.
30.	1969-1972	Several Insulation Hygiene Progress Reports from Insulation Industry Hygiene Research Program: – Spring 1969 - Spring 1971 – Summer 1971 - Fall 1971 – Summer 1972
31.	1969-1972	Various documents copied from the pipefitters & building & construction trades weekly newsletter & other documents (obtained from U.S. Dept. of Labor). See attached index.
32.	1969-1976	Compilation of inhalation hygiene progress reports, from the Insulation Industries Hygiene Research Program
33.	Aug. 19, 1970	Deposition of Joseph Ralph Shrode given in ***Porter v. Fibreboard***, C.A. No. 6329, U.S.D.C. E.D. Texas, and trial testimony given in ***Borel v. Fibreboard***, C.A. No. 6449, U.S.D.C. E.D. Tex.
34.	Sept./Oct. 1970	Interrelationships of Selected Asbestos Exposure Indices, by Jeremiah Lynch, Howard Ayer & Douglas Johnson
35.	Dec. 1970	A Labor Management Occupational Health Service in a Construction Industry, by Irving R. Tabershaw, Clark Cooper, & LeRoy Blazer
36.	1970-1971	NICA Outlook (National Insulation Contractors Association) booklets: - February, 1970 – March, 1970 - January, 1971 – March, 1971 - June, 1971
37.	1971	Asbestos: The Need for & Feasibility of Air Pollution Controls, from the National Academy of Sciences
38.	1971	"Fundamentals of Industrial Hygiene" by National Safety Council

39.	1971	Documentation of the Threshold Limit Values for Substances in Workroom Air, 3rd edition, by American Conference of Governmental Industrial Hygienists
40.	Dec. 2, 1971	"Effects of Low Concentrations of Asbestos", by Murphy, et al (including Edward Gaensler)
41.	Dec. 7, 1971	"OSHA Program Directive #6: Asbestos Dust, Emergency Standard Implementation"; and Rules and Regulations from the Federal Register and the ETS
42.	1971-1973	Various articles from the UA Journal, "Our Troubled Environment" section: – Nov. 1971 – July 1972 – Apr. 1973
43.	1972	"Criteria for a Recommended Standard . . . Occupational Exposure to Asbestos", from the U.S. Department of Health, Education & Welfare
44.	1972	Documents from the Exhibit List for the 1972 OSHA Asbestos Hearing.
45.	May 1972	National Geographic Magazine
46.	May 14, 1972	"Dust Exposure in Asbestos Processing", from Transactions of the 34th Annual meeting of the ACGIH, by Robert B. Weidner & Howard E. Ayer
47.	Sept. 1972	"Carcinogenicity of Amosite Asbestos", by Selikoff, Hammond & Churg
48.	Apr. 1973	"Health Hazard Evaluation/Toxicity Determination", by Raymond L. Hervin, et al (with National Institute for Occupational Safety & Health)
49.	Dec. 1976	Revised Recommended Asbestos Standard, from National Institute for Occupational Safety & Health
50.	1979	Health Hazards of Asbestos Exposure, Annals of the New York Academy of Sciences, 1979

51.	1979	"Asbestos Exposure: Factors Associated with Excess Cancer and Respiratory Disease Mortality"
52.	1979	"Historical Background to the Asbestos Problem" by Selikoff & Lee
53.	1981	"Quantitative Estimates of Avoidable Risks of Cancer in the US Today" from The Causes of Cancer by Oxford Medical Publications ed. by Richard Doll and Richard Peto
54.	Feb. 1982	"Mortality Study of Petroleum Refinery Workers: Update of Follow-up", prepared by Samuel D. Kaplan for the American Petroleum Institute
55.	Oct. 8, 1982	"The Pathology of Asbestos Associated Diseases of the Lungs & Pleural Cavities: Diagnostic Criteria & Proposed Grading Scheme" (a special issue from the Archives of Pathology & Laboratory Medicine), by John E. Craighead, et al
56.	Dec. 1982	Analysis of fiber release from certain asbestos products--draft final report, prepared by G.C.A. Corp. for U.S. Environmental Protection Agency (contains data on fiber release & concentrations)
57.	1983	Chapter 8 on Mesothelioma from Cancer Epidemiology by Edith Deborah Greenwald, M.P.H. and Edward S. Greenwald M.D.
58.	June 10, 1983	"Non-asbestos Related Malignant Mesothelioma", by Theiderson, Greenberg & Buffler
59.	1985	"Asbestos Exposure--Quantitative Assessment of Risk", by Janet Hughes & Hans Weill
60.	1985	"Asbestos", a chapter from Mineral Facts & Problems, by the Bureau of Mines
61.	Jan. 1985	"Alternatives to Asbestos in Asbestos Products", by A.A. Hodgson
62.	1986	"Asbestos as a Public Health Risk: Disease and Policy" from Annual Reviews : Public Health by Hans Weill and Janet M. Hughes
63.	Mar. 1986	"Evaluation of Impairment/Disability Secondary to Respiratory Disorders", from the American Thoracic Society, by Attlilo D. Renzetti, Jr., M.D., et al

64.	Apr. 1986	"Malignant Mesothelioma," by Andrew Churg
65.	Apr. 1986	"The Diagnosis of Non-malignant Diseases Related to Asbestos" report of the Combined Committee of the American College of Chest Physicians & American Thoracic Society
66.	1987	"Mortality of Workers Employed in 2 Asbestos Cement Manufacturing Plants", from the British Journal of Industrial Medicine, by Janet Hughes, Hans Weill, & Yehia Hammad
67.	1987	"Epidemiology of Malignant Mesothelioma" from Asbestos-Related Malignancy ed. by Karen Antman M.D. and Joseph Aisner, M.D.
68.	1988	"Asbestos Health Effects: Resolving the Scientific Uncertainties", from the Post-graduate Medicine Journal, by Janet Hughes & Hans Weill
69.	1989	"Critical Review of Cancer Epidemiology in Petroleum Industry Employees, with a Quantitative Meta-analysis by Cancer Site," by Otto Wong & Gerhard Raabe
70.	1989	"Job Safety & Health for the Piping Industry" (a manual published by Plumbing Apprentice & Journeyman Training, Inc.)
71.	1989	"Progression of Asbestos Effects: A Prospective Longitudinal Study of Chest Radiographs & Lung Function", from the British Journal of Industrial Medicine, by R.N. Jones, J.E. Diem, Janet M. Hughes, Yehia Y. Hammad, H.W. Glindmeyer, & H. Weill
72.	1989	"Benign and Malignant Mesothelioma" from Cancer: Principles & Practice of Oncology, Vol. 2 3rd ed.
73.	1989	"Development and Use of Asbestos Risk Estimates" by J.M. Hughes and H. Weill; Reprinted from Non-Occupational Exposure to Mineral Fibers
74.	Apr. 5, 1989	Deposition on Written Questions from ***Russell Allen*** case of Texas Dept. of Public Health - 1957 Occupational Heath Regulations
75.	May 19, 1989	"Asbestos Lung Disease: Current Controversies Regarding the Control & Prevention of Lung Cancer", by Andrew Churg
76.	1990	"The Health Benefits of Smoking Cessation: a Report of the Surgeon General" from the US Dept. of Health and Human Services

77.	1990	"Laryngeal Cancer and Asbestos" by Liddell
78.	1990	"U.S. Surgeon General: Health Benefits of Smoking Cessation"
79.	1991	"Asbestos in Public & Commercial Buildings: a Literature Review & Synthesis of Current Knowledge", by the Health Effects Institutes
80.	1991	"The Discovery of the Association Between Blue Asbestos & Mesotheliomas & the Aftermath", by J.C. Wagner
81.	1991	"Asbestosis as a Precursor of Asbestos Related Lung Cancer: Results of Mortality Study", from the British Journal of Industrial Medicine, by Janet Hughes & Hans Weill
82.	1991	"Benign and Malignant Mesotheliomas" from Comprehensive Textbook of Oncology 2nd ed
83.	1992	Chapter on Mesothelioma from Pathology of Asbestos-Associated Diseases ed. by Victor L. Roggli, M.D., S. Donald Greenberg, M.D., and Phillip C. Pratt, M.D.
84.	March, 1992	"The Health Consequences of Smoking" by Polly A. Newcomb, Ph.D, and Paul P. Carbone, M.D. (Hon)
85.	Apr. 1993	U.S. Bureau of Mines annual report on asbestos in 1992
86.	Mar. 14, 1994	Deposition of Michael W. Cunningham, Local 22, re deaths of certain individuals - taken in ***Rita Schmidt v. AC&S***
87.	Dec. 1995	"The Lack of Causality Between Asbestos and Colorectal Cancer" from JOEM by William Weiss, M.D.
88.	Mar. 15, 1996	Articles on the medical aspects of asbestos cases, particularly on cancer risk and attribution of lung cancer: – "The Diagnosis of Nonmalignant Diseases Related to Asbestos" – "Evaluation of Impairment/Disability Secondary to Respiratory Disorders" (American Thoracic Society, March 1986) – "Asbestos, Asbestosis, and Lung Cancer", an Editorial, Modern Pathology, Vol. 6, No. 5, September 1993 – "Carcinoma of the Lung" from Pathology of Asbestos-Associated Diseases by Roggli, Greenberg and Pratt, 1992 – "Pulmonary Fibrosis as a Determinant of Asbestos-Induced

Lung Cancer in a Population of Asbestos Cement Workers" by Janet Hughes and Has Weill

- "Is Asbestos or Asbestosis the Cause of the Increased Risk of Lung Cancer in Asbestos Workers?", an Editorial from British Journal of Industrial Medicine, 1986, by Kevin Browne
- Medical Progress - Asbestos-Related Diseases" by Mossman and Gee, from the New England Journal of Medicine, June 29, 1989
- "Exposure to Asbestos and the Risk of Gastrointestinal Cancer: a Reassessment" by Edelman, British Journal of Industrial Medicine, 1988
- "Asbestos and Colon Cancer: Lack of Association in a Large Case-Control Study" by Garabrant, et al., 1992
- "Fiber Toxicology," edited by David Warheit, DuPont

89. undated — U.S. Navy film entitled "Insulating Hot & Cold Pipes"

90. undated — "Asbestos-Related Disease in the Workplace and the Environment: Controversial Issues" from The Lung-Current Concepts, ed. by Andrew Churg, M. D.

91. undated — "Asbestos, Asbestosis, and Lung Cancer" Editorial from Modern Pathology by Andrew Churg, M.D.

92. undated — Articles on colon and other gastro cancers:

- Ehrlich, Gordon & Dikman, 1991, "Carcinoma of the Colon in Asbestos-Exposed Workers: Analysis of Asbestos Content in Colon Tissue"
- Seidman and Selikoff, 1986, "Decline in Death Rates Among Insulation Workers 1967-1986 Associated With Diminution of Work Exposure to Asbestos"
- Edelman, 1988, "Exposure to Asbestos and the Risk of Gastrointestinal Cancer: a Reassessment"
- Weiss, "Lack of Causality Between Asbestos and Colon Cancer"
- Garabrant, 1992, "Asbestos and Colon Cancer: Lack of Association in a Large Case-Control Study"
- Donham, et al, "The Effects of Long-Term Ingestion of Asbestos on the Colon of F344 Rats"
- Frumkin, 1988, "Asbestos Exposure and Gastrointestinal Malignancy Review and Meta-Analysis"

93. undated — "Asbestos and Disease" by Selikoff

94. undated — Charts of Plaintiff's work history

95.	1943	"Safeguarding Petroleum Refineries and Their Workers" by Roy S. Bonsib
96.	December 1999	"A Case Control Study of Lung Cancer Among Refinery Workers" by Rosamilia, Long, and Raabe
97.	undated	"What ? No Asbestos ?" A magazine advertisement for Asbestos Limited Inc.
98.	undated	Advertisement for Johns-Manville products referring to "asbestos the magic mineral"
99.	undated	Advertisement entitled "Asbestos in Action" from Keasbey & Mattison Company
100.	undated	U.S. Fuel Administration tag on "hints on saving coal"
101.		Documents from Brown & Root Inc. as follows:

(a) office memo dated 4/27/71 re: safety and health regulations for construction;

(b) office memo of 11/7/72 re: asbestos

(c) 11/16/72 office memo pertaining to asbestos

(d) 1/9/73 office memo concerning record keeping for asbestos

(e) 6/23/75 office memo regarding asbestos and fiberglass sampling

(f) 11/15/77 office memo, subject: asbestos

(g) 4/1/76 office memo re: asbestos record keeping requirements

(h) asbestos program - Brown & Root Inc. (undated)

(i) 1/14/76 office memo concerning respiratory protection and attached respiratory protection program

102.	undated	Mundy Industrial Maintenance's Procedures for Working Asbestos Insulation