



18TH JUDICIAL DISTRICT COURT
PARISH OF IBERVILLE
STATE OF LOUISIANA

LORRAINE PEGGY WILLIAMS
VERSUS
MCCARTY CORPORATION, ET AL

SUIT NO.: 39,404
DIVISION "D"

EXXON CORPORATION'S RESPONSE TO PLAINTIFF'S
REQUEST FOR ADMISSIONS OF FACT

Exxon Corporation ("Exxon") hereby responds to the request for admissions of fact served on it by the plaintiff on or about July 21, 1991, as follows:

REQUEST FOR ADMISSION NUMBER 1

The attached copy of the document entitled "Industrial Hygiene Survey of the Baton Rouge Refinery, Louisiana, Division, Esso Standard Oil Company, February, March, and April, 1949", prepared by James Morgan and W.C.L. Hemeon of the Industrial Hygiene Foundation of America, Inc., is authentic.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 1

Exxon objects to request for admission number 1 because Exxon does not understand the meaning, within the context of the request for admission, of the word "authentic." Exxon believes, without a word-for-word comparison, that the document entitled "Industrial Hygiene Survey of the Baton Rouge Refinery, Louisiana Division, Esso Standard Oil Company, February, March, and April, 1949" which was attached to the request for admission is an accurate copy of the original of that document. Exxon further objects to this request for admission because it does not seek the admission of admissible or relevant fact. The document was not authored nor prepared by Exxon, but was in fact prepared by Morgan and Hemeon of the Industrial Hygiene Foundation of

America, Inc., an entity which is separate from Exxon. The document does not purport to be, nor can it be construed to be, a statement by Exxon. It is hearsay and, for that reason, cannot be introduced in these proceedings.

REQUEST FOR ADMISSION NUMBER 2

The attached copy of the document entitled "Dust Producing Operations in the Production of Petroleum Products and Associated Activities", prepared in July, 1937, by the Chief Safety Inspector of Standard Oil Company, N.J., is authentic.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 2

Exxon objects to this request for admission because it does not understand, within the context of the request for admission, the meaning of the word "authentic." Exxon does admit that the document entitled "Dust Producing Operations in the Production of Petroleum Products and Associated Activities", prepared in July, 1937 by the Chief Safety Inspector of Standard Oil Company, N.J., is an accurate copy of the original of that document. Beyond that, Exxon denies request for admission number 2.

REQUEST FOR ADMISSION NUMBER 3

Exxon Corporation is the successor of Standard Oil Company, N.J.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 3

Denied. See response to interrogatory number 1 filed by Exxon on or about July 22, 1991.

REQUEST FOR ADMISSION NUMBER 4

Exxon Corporation is the successor of Esso Standard Oil Company.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 4

Admitted.

REQUEST FOR ADMISSION NUMBER 5

Exxon Corporation is liable for any tortious conduct of Standard Oil Company, N.J.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 5

Exxon objects to request for admission number 5 because it seeks the admission of a legal conclusion as opposed to a factual or evidentiary matter.

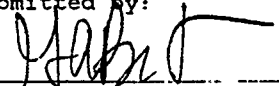
REQUEST FOR ADMISSION NUMBER 6

Exxon Corporation is liable for any tortious conduct of Esso Standard Oil Company.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 6

Exxon objects to request for admission number 6 for the same reason that it objected to request for admission number 5.

Submitted by:



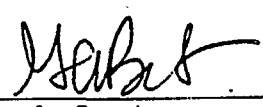
Gary A. Bezet
Bar Roll No. 3036
KEAN, MILLER, HAWTHORNE,
D'ARMOND, McCOWAN & JARMAN
Post Office Box 3513
Baton Rouge, Louisiana 70821
Telephone: (504) 387-0999

David W. Ledyard
STRONG, PIPKIN, NELSON & BISSELL
1400 San Jacinto Building
595 Orleans
Beaumont, Texas 77701-3255
Telephone: (409) 835-4581

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been mailed, postage prepaid, to all counsel of record.

Baton Rouge, Louisiana, August 15, 1991.



Gary A. Bezet