PLAINTIFF'S EXHIBIT
CEL-13003

CAUSE NO. 00-03032-00-0-B

JOHN WAYNE WALKER, et al.,	§	IN THE DISTRICT COURT OF
	§	
Plaintiffs,	§	
	§	
vs.	§	NUECES COUNTY, TEXAS
	§	
GAF CORPORATION (successor to RUBEROID CORPORATION), et al.,	§	
	§	
Defendants.	§	117TH JUDICIAL DISTRICT

DEFENDANT CELANESE LTD.'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF

TO: Plaintiff Jesse Paul Turney, by and through his attorneys, Jennyfer B. Gray, BARON & BUDD, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219

Pursuant to Rule 197 of the Texas Rules of Civil Procedure, you are directed to answer the following Interrogatories in accordance with the applicable Texas Rules of Civil Procedure. The interrogatories are directed to the plaintiff named above, and plaintiff must answer the interrogatories, separately and fully, in writing and under oath. A true copy of the answers must be served on the undersigned attorneys for Celanese Ltd., on or before thirty days after service hereof.

Respectfully submitted,

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Ellen B. Mallow
State Bar No. 12888280
Angela R. Hoyt
State Bar No. 00796783
700 Louisiana Street, Suite 2200
Houston, Texas 77002-2730
(713) 220-8800
(713) 222-0843 (Facsimile)

HAWKINS & PARNELL

Michael E. Hutchins
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308
(404) 614-7400
(404) 614-7500 (Facsimile)

ATTORNEYS FOR DEFENDANT
CELANESE LTD.

OF COUNSEL:

Marc E. Kasowitz
Hector Torres
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
1301 Avenue of the Americas
New York, New York 10019
(212) 506-1700
(212) 506-1800 (Facsimile)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via U.S. mail and/or certified mail, return receipt requested, to all counsel of record on this ~~21st~~ 23rd day of February, 2001.

Angela R. Hoyt

Angela R. Hoyt

DEFINITIONS

As used in these Interrogatories, the following terms are defined:

(a) "Identify" or "identity" or "identification" when used in reference to documents shall be understood as an instruction to identify the document completely. The identification shall include, but not be limited to, the document's date, title, authors, addresses and other recipients, type (e.g., letter, notes. memoranda, diary, etc.), subject matter, present location, present custodian, and the purposes for which the document was created or prepared.

(b) "Identify" or "identity" or "identification" as used herein with reference to a natural person or entity, means to state the name, title, last known business or residential address, and telephone numbers of such person or entity.

(c) The words "product containing asbestos fibers," "asbestos-containing products," and "asbestos products" all refer to any products or materials prepared in any way for sale, distribution and/or incorporation into other products, and that contain any kind of asbestos in any form. The words "asbestos materials" and "substances" refer to any and all substances, or matter used or assembled or fabricated during the manufacturing of a product that contains asbestos fibers in any form.

(d) The words "you" and "your" mean the plaintiff, as well as his or her agents and representatives. If the named plaintiff is a surviving spouse and\or legal representative of a decedent, "you" and "your" means both the representative and the decedent.

(e) "Celanese" means the defendant, Celanese Ltd., and any of its predecessors, parent companies, subsidiaries, employees, agents, or representatives.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify all Celanese plants or facilities that you worked in for which you allege you were exposed to asbestos, asbestos dust, or asbestos containing products, and for each, state:

(a) the name and address of each plant or facility;
(b) the specific dates you worked at each plant or facility identified above;
(c) your employer(s) while you worked at each plant or facility identified above;
(d) your trade or occupation while working at each plant or facility identified above, and the nature of the activities in which you were engaged during your employment there.
(e) the location(s) or unit(s) where you worked at each plant or facility identified above;
(f) the name of your immediate supervisor(s) while working at each plant or facility identified above; and
(g) the reason for your termination of employment at each plant or facility identified above.

ANSWER:

INTERROGATORY NO. 2:

State in detail your smoking history and/or the history of your use of all tobacco products, to include stating when your started smoking or otherwise using tobacco products and when you stopped, if applicable; the amount of tobacco products you smoked or otherwise used on a daily basis; and the brand of the tobacco products you smoked or otherwise used.

ANSWER:

INTERROGATORY NO. 3:

State the names and addresses of all doctors, psychiatrists, psychologists, counselors, hospitals, clinics, or other health care providers which have treated or examined you or to which you have gone from your 15th birthday until the present.

ANSWER:

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

700 LOUISIANA STREET, SUITE 2200

HOUSTON, TEXAS 77002

713-220-8800

FACSIMILE: 713-222-0843

1633 BROADWAY
NEW YORK, NEW YORK 10019
212-506-1700

ONE GATEWAY CENTER
NEWARK, NEW JERSEY 07102
973-645-9462

WRITER'S DIRECT DIAL NUMBER
(713) 220-8817

February 22, 2001

VIA FEDERAL EXPRESS

Mr. Oscar Soliz
Nueces County District Clerk
Courthouse
901 Leopard Street
Corpus Christi, TX 78401

Re: *John Wayne Walker, et al. v. GAF Corporation (successor to Ruberoid Corporation), et al.*, Cause No. 00-03032-00-0-B, in the 117th Judicial District Court, Nueces County, Texas

Dear Mr. Soliz:

Enclosed for filing in the above-referenced matter is an original and one copy of the following documents:

1) **Defendant Celanese Ltd.'s First Amended Answer**; and

2) **Defendant Celanese Ltd.'s Certificate of Discovery** regarding Celanese's First Set of Interrogatories to Plaintiff Jesse Paul Turney and Celanese's Request for Disclosure.

Please acknowledge filing of the above documents by placing your file stamp on the copies provided and returning them to me in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this matter.

Very truly yours,

Angela R. Hoyt

Angela R. Hoyt

ARH/lle
Enclosures

cc: Counsel of Record

70221.1

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

700 LOUISIANA STREET, SUITE 2200

HOUSTON, TEXAS 77002

713-220-8[illegible]0

FACSIMILE: 713-222-0843

1633 BROADWAY
NEW YORK, NEW YORK 10019
212-506-1700

ONE GATEWAY CENTER
NEWARK, NEW JERSEY 07102
973-645-9462

WRITER'S DIRECT DIAL NUMBER

(713) 220-8817

February 22, 2001

VIA CERTIFIED MAIL–
RETURN RECEIPT REQUESTED

Ms. Jennyfer B. Gray
BARON & BUDD, P.C.
The Centrum
Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

Re: *John Wayne Walker, et al. v. GAF Corporation (successor to Ruberoid Corporation), et al.*, Cause No. 00-03032-00-0-B, in the 117th Judicial District Court, Nueces County, Texas

Dear Ms. Gray:

Enclosed are the following documents:

1) Defendant Celanese Ltd.'s First Amended Answer;

2) Defendant Celanese Ltd.'s First Set of Interrogatories to Plaintiff Jesse Paul Turney;

3) Defendant Celanese Ltd.'s Request for Disclosure to Plaintiff Jesse Paul Turney; and

4) Defendant Celanese Ltd.'s Certificate of Discovery.

Very truly yours,

Angela R. Hoyt

Angela R. Hoyt

ARH/lle
Enclosures

70222.1

CAUSE NO. 00-03032-00-0-B

JOHN WAYNE WALKER, et al.,	§	IN THE DISTRICT COURT OF
	§	
Plaintiffs,	§	
	§	
vs.	§	NUECES COUNTY, TEXAS
	§	
GAF CORPORATION (successor to RUBEROID CORPORATION), et al.,	§	
	§	
Defendants.	§	117TH JUDICIAL DISTRICT

DEFENDANT CELANESE LTD.'S
CERTIFICATE OF DISCOVERY

I, Angela R. Hoyt, counsel for Defendant Celanese Ltd., certify that on this the 22nd day of February, 2001, I served the following discovery by certified mail, return receipt requested, on the respective attorneys of record for Plaintiff Jesse Paul Turney:

1) Defendant Celanese Ltd.'s First Set of Interrogatories to Plaintiff; and

2) Defendant Celanese Ltd.'s Request for Disclosure.

Respectfully submitted,

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Ellen B. Malow
State Bar No. 12888280
Angela R. Hoyt
State Bar No. 00796783
700 Louisiana Street, Suite 2200
Houston, Texas 77002-2730
(713) 220-8800
(713) 222-0843 (Facsimile)

HAWKINS & PARNELL

Michael E. Hutchins
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308
(404) 614-7400
(404) 614-7500 (Facsimile)

ATTORNEYS FOR DEFENDANT
CELANESE LTD.

OF COUNSEL:

Marc E. Kasowitz
Hector Torres
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
1301 Avenue of the Americas
New York, New York 10019
(212) 506-1700
(212) 506-1800 (Facsimile)

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via United States certified mail, return receipt requested, on counsel for plaintiffs, and by regular mail, postage prepaid, on all remaining known counsel of record, on this ~~21st~~ 23rd day of February, 2001.

Angela R. Hoyt