PLAINTIFF'S EXHIBIT

EXX-293

CAUSE NO. 00-10192-K

JERRY WAYNE MORRIS, ET AL	§	IN THE DISTRICT COURT
	§	
VS.	§	DALLAS COUNTY, TEXAS
	§	
U.S. GYPSUM COMPANY, ET AL	§	192ND JUDICIAL DISTRICT

EXXONMOBIL CORPORATION'S INTERROGATORY, REQUEST FOR ADMISSIONS AND REQUEST FOR PRODUCTION TO PLAINTIFF

TO: Plaintiff, LEVI JACK PENTON, by and through his attorney of Record, D. Leanne Jackson, BARON & BUDD, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75213

COMES NOW, EXXONMOBIL CORPORATION, Defendant in the above-entitled and numbered cause, pursuant to the Texas Rules of Civil Procedure, and propounds the following Interrogatory, Request for Admission and Request for Production to the Plaintiff, by serving this discovery upon party's attorney of record and requires that answers be served upon the undersigned within thirty (30) days after the service of this discovery.

You are advised that this discovery shall be answered fully and separately in writing under oath. You are further advised that although a party's answers may be complete when made, a party is under a duty to amend his answer if he should obtain information upon the basis of which: (a) he knows that the original answer was incorrect, or (b) he knows that although the original answer was correct when made, it is no longer correct and the circumstances are such that a failure to amend the answers is, in substance, a concealment.

REQUEST FOR ADMISSION NO. 1:

Admit or Deny that you have never worked at a facility or on a premise owned or operated by Exxon Corporation.

RESPONSE:

REQUEST FOR ADMISSION NO. 2:

Admit or Deny that you have never worked at a facility or on a premise owned or operated by Mobil Oil Corporation.

RESPONSE:

INTERROGATORY NO. 1:

If you Deny any of Request for Admissions above, please answer the following:

a. Identify the name and location of each facility and/or plant owned or operated by this Defendant at which you worked. If the name of the plant has changed, give the name as it was known to you when you worked at that facility;

b. Identify each specific unit or location within each facility and/or plant owned or operated by this Defendant at which you worked. If you are unable to give this information, then describe the type of worked that was being performed, i.e. shutdown, new construction, etc.

c. State the date and duration in days, weeks or months that you worked at the facility and/or premise identified above.

d. State the name and address of your employer at each job you worked at the facility and/or on the premise of Defendant.

e. List the names of each of your supervisors and coworkers at the facility and/or plant.

f. State your job classification for each job worked.

ANSWER:

REQUEST FOR PRODUCTION NO. 1:

Please identify each party's name with whom you have entered into any agreement to settle, release, or dismiss any part of this cause of action or any cause of action relating to plaintiff's injury. Also, please list the terms of the settlements as to the amount of monies paid or to be paid, and any agreements.

RESPONSE:

Respectfully submitted,

David W. Ledyard
State Bar No. 12109400
14th Floor, San Jacinto Building
Beaumont, Texas 77701-3255
(409)981-1000
(409)981-1010 Facsimile

ATTORNEYS FOR DEFENDANT,
EXXONMOBIL CORPORATION

CERTIFICATE OF SERVICE

This will verify that a true and correct copy of ExxonMobil Corporation's Interrogatory, Request for Production and Request for Admissions has been furnished to counsel for plaintiff, by certified mail, return receipt requested, and to all other known counsel of record by regular U.S. Mail, on this 16th day of March, 2001.

David W. Ledyard

STRONG, PIPKIN, NELSON, BISSELL & LEDYARD, L.L.P.
ATTORNEYS AT LAW

1400 SAN JACINTO BUILDING
595 ORLEANS
BEAUMONT, TEXAS 77701-3255

TELEPHONE (409) 981-1000
FACSIMILE (409) 981-1010

HOUSTON OFFICE
1111 BAGBY
SUITE 2300
HOUSTON, TEXAS 77002-2545
TELEPHONE (713) 651-1900
FACSIMILE (713) 651-1920

DAVID W. LEDYARD
PARTNER
DIRECT DIAL (409) 981-1130
EMAIL: dledyard@spnbl.com

March 16, 2001

Mr. Jim Hamlin
Dallas County Courthouse
George L. Allen, Sr. Courts Building
600 Commerce Street
Dallas, Texas 75202-4606

Re: Cause No.00-10192-K; Jerry Wayne Morris, et al vs. U.S. Gypsum Co., et al ; 192nd District Court, Dallas County, Texas

Dear Mr. Hamlin:

Enclosed for filing is a Notice of Filing for:

- EXXONMOBIL CORPORATION'S INTERROGATORY, REQUEST FOR ADMISSIONS AND REQUEST FOR PRODUCTION TO PLAINTIFF
- EXXONMOBIL CORPORATION'S DISCLOSURE TO PLAINTIFF

Very truly yours,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.

David W. Ledyard