PLAINTIFF'S EXHIBIT
DOW-463

NO. 14689*JG01

CHARLES THOMAS LAWSON,	§	IN THE DISTRICT COURT
	§	
	§	
VS.	§	BRAZORIA COUNTY, TEXAS
	§	
U.S. GYPSUM COMPANY,	§	
ET AL.	§	239TH JUDICIAL DISTRICT

THE DOW CHEMICAL COMPANY'S FIRST SET OF INTERROGATORIES TO PLAINTIFF CHARLES THOMAS LAWSON

TO: Plaintiff, Charles Thomas Lawson, by and through his attorneys of record, Elizabeth R. Schick/ William K. Tapscott, Jr., Baron & Budd, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219, *and* Anthony Tomblin, Tomblin, Cames, McCormick, L.L.P., 210 Barton Springs, Suite 550, Austin, Texas 78704.

Pursuant to Rule 197 of the Texas Rules of Civil Procedure, Defendant, The Dow Chemical Company, serves these interrogatories upon you. The answers should be made under oath, separately and fully in writing, preceded by the question to which the answer pertains, and given to the undersigned counsel of record within thirty (30) days.

Respectfully submitted,

MEHAFFY & WEBER, P.C.

By: _____
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Texas Bar No. 01188800
Elna N. Griggs
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ATTORNEYS FOR DEFENDANT
THE DOW CHEMICAL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing instrument were served upon all attorneys of record on this the 5th day of April, 2001, in accordance with Rule 21 and 21a of the Texas Rules of Civil Procedure.

Arthur R. Almquist / Elna N. Grigg

DEFINITIONS

1. For the purpose of interpreting or construing the scope of the interrogatories made herein, the terms used should be given their most expansive and inclusive interpretations unless otherwise specifically limited in any particular request. This includes, without limitation, the following:

    (1) Construing "and" as well as "or" in the conjunctive or disjunctive as necessary to make the interrogatory more inclusive;

    (2) Construing the singular form of a work to include the plural and the plural form to include the singular;

    (3) Construing the past tense of a verb to include the present and the present tense to include the past;

    (4) Construing the terms "refer to," "reflect," and "relating to" to include any connection whatsoever, direct or indirect, with the requested subject matter.

2. "Identify," when used in reference to a natural person, means to state the person's name, last known business and residential addresses, and respective telephone numbers.

3. "Identify," when used in reference to any legal entity, means to state its legal name, address, and telephone number.

4. "Identify," when used in reference to a document or tangible thing, means to state its date, author, type (e.g. letter, memorandum, schedule, report, chart, and photograph, tape recording, or note), present location, and present custodian.

5. "Identify," when used in reference to a communication, means to state the identity of the persons involved or participating in the communication, the date of the communications, and the general subject matter of the communication.

6. "Medical Practitioner" means any doctor, physicians, surgeon, osteopath, or other person engaged in the healing arts and sciences.

7. "Dow" means The Dow Chemical Company.

8. "You" or "plaintiff" refers to Charles Thomas Lawson.

INTERROGATORIES

INTERROGATORY NO. 1:

Describe your employment history (including self-employment), including in your description the name, address, dates of employment by each employer and a brief description of the work performed by you for each employer, the locations where you worked for each employer, and whether or not you were exposed to asbestos while you worked for each employer.

ANSWER:

INTERROGATORY NO. 2:

Describe your employment history at the Dow facility at which you allege to have been exposed to asbestos and/or asbestos-containing products. Include in your description the name and address of the facility, your best information regarding dates of employment there, your employer while you worked in, at, or for the facility and at what location or unit in the facility you worked.

ANSWER:

INTERROGATORY NO. 3:

For each occasion on which you worked at the Dow facility identified by you in the preceding interrogatory, please provide a description of the work performed by you at that facility. Please include your job title for each such employment and your wages and income (per week, month or year, as appropriate, for each specific employment listed above).

ANSWER:

INTERROGATORY NO. 4:

State the name, address and telephone number of all supervisors and co-workers with whom you worked for each date of employment listed by you in answer to interrogatory number 2.

ANSWER:

INTERROGATORY NO. 5:

If you contend you were exposed to asbestos or asbestos-containing products while working at the Dow facility listed by you in answer to interrogatory number 2, please list each type of product and describe when, where, and how you were exposed to each such product.

ANSWER:

INTERROGATORY NO. 6:

With respect to any products identified by you in interrogatory number 5, state all warnings or instructions which accompanied it, which you have seen regarding it, or which you were given by any source regarding it while you were employed at the Dow facility.

ANSWER:

INTERROGATORY NO. 7:

State whether or not you could read or write at the time you are alleging exposure to any asbestos or asbestos-containing products while working at the Dow facility identified by you in answer to interrogatory number 2.

ANSWER:

INTERROGATORY NO. 8:

Please identify each and every person known to you who has knowledge, direct or indirect, of your exposure to any asbestos or asbestos-containing products while working at the Dow facility identified in answer to interrogatory number 2. Please give the following information:

a. the name of the company or employer for whom such witness was working at the time they gained knowledge of your exposure to any such products;

b. the year or years it is believed by such witness that you were exposed to asbestos or asbestos-containing products while at the Dow facility; and

c. describe the asbestos or asbestos-containing products which the witness believes you were exposed to.

ANSWER:

INTERROGATORY NO. 9:

List the names and addresses of every doctor or medical practitioner seen by you for any reason during your life as well as the names and addresses of each hospital in which you were a patient, and as to each, describe the condition being treated and the inclusive dates of each such treatment or hospitalization.

ANSWER:

INTERROGATORY NO. 10:

State the date you first experienced any lung or respiratory problem which you claim is related to asbestos exposure and identify each physician with whom you consulted about those problems.

ANSWER:

INTERROGATORY NO. 11:

If you missed any time from work as a result of the disease or illness made the basis of this suit, please state the following:

a. how much time you lost from work and whether there were any deductions from your pay as a result of such lost time; and

b. how much in salary or wages, if any, you lost as a result of the disease or illness made the basis of this suit.

ANSWER:

INTERROGATORY NO. 12:

Have you ever been warned or informed of the potential dangers of asbestos exposure? If so, identify by name, address and telephone number each person who conveyed such warning or information, the employer of each such person, and the dates any such warning or information was conveyed to you.

ANSWER:

INTERROGATORY NO. 13:

Identify all statutes, regulations, procedures, codes, guidelines, industry standards, or safety standards relating to dust or asbestos that you contend were or may have been violated by Dow during the time period when Plaintiff worked at a Dow facility.

ANSWER:

INTERROGATORY NO. 14:

If you have ever smoked, state when you started smoking, what type of tobacco product you smoked, when you smoked it and for how long, how much you smoked of each type of tobacco product, whether a physician ever advised you to stop smoking, and if so, who and when, and state the reasons you stopped smoking.

ANSWER:

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	§	**239TH JUDICIAL DISTRICT**

CERTIFICATE OF WRITTEN DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant, The Dow Chemical Company, and hereby certifies under the Texas Rules of Civil Procedure that the following documents have been served on plaintiffs on the 5th day of April, 2001:

1. **Defendant The Dow Chemical Company's Request for Disclosure to Plaintiff Charles Thomas Lawson;**

2. **Defendant The Dow Chemical Company's First set of Interrogatories to Plaintiff Charles Thomas Lawson; and**

3. **Defendant The Dow Chemical Company's Request for Production to Plaintiff Charles Thomas Lawson.**

Respectfully submitted,

MEHAFFY & WEBER, P.C.

By: Arthur R. Almquist/FNH by permission

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ATTORNEYS FOR DEFENDANT,
THE DOW CHEMICAL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing instrument were served upon all attorneys of record on this the 5th day of April, 2001, in accordance with the Texas Rules of Civil Procedure.

Arthur R. Almquist /ENH by permission

Arthur R. Almquist / Elna N. Griggs