

CAUSE NO. 00-CV-248

RAYMOND PACE, ET AL.

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COUNTY COURT AT LAW

VS.

GAF CORPORATION (F/K/A NEWCO
HOLDINGS, INC.), INDIVIDUALLY AND AS
SUCCESSOR TO GAF CORPORATION
(F/K/A GENERAL ANILINE & FILM
COMPANY), AND THE RUBEROID
COMPANY, ET AL.

MEMBER OF

CALHOUN COUNTY, TEXAS

**DEFENDANT E. I. DUPONT DE NEMOURS AND COMPANY'S
DESIGNATION OF EXPERT WITNESSES**

TO: Plaintiffs Raymond Pace and John Andrew Wooten, Jr., by and through their attorney,
Stephanie Finch, Baron & Budd, P.C. 3102 Oak Lawn, Suite 1100, Dallas, Texas 75219

Pursuant to this Court's May 31, 2001 Scheduling Order, E. I. du Pont de Nemours and
Company ("DuPont") hereby designates the following experts. DuPont expressly reserves the right
to amend and supplement these expert designations.

1. **Morton Corn, Ph.D.**
Department of Environmental Health Sciences
The Johns Hopkins University
615 North Wolfe Street, Room 6010
Baltimore, Maryland 21205
(410) 955-3602
(410) 955-9334 facsimile

Dr. Morton Corn is a professor emeritus with the Johns Hopkins University's Department
of Environmental Health Sciences in Baltimore. He is currently Director, National Institute of
Occupational Safety and Health (NIOSH) Educational Resource Center in Occupational Safety and
Health for Training Physicians, Nurses, Hygienists and Safety Professionals, and Director, Division
of Environmental Health Engineering.

Dr. Corn is an industrial hygienist with long-standing experience in addressing asbestos-
related issues from the perspective of an industrial hygienist and governmental regulator. He received
his Ph.D. degree in Industrial Hygiene and Sanitary Engineering from Harvard University's Division
of Engineering and Applied Physics in 1961. He served as Assistant Secretary of Labor for the

Occupational Safety and Health Administration (OSHA) from 1970 to 1977 during the Ford Administration.

Dr. Corn may testify concerning the following subjects: (a) the uses and characteristics of asbestos and asbestos-containing products; (b) the development of industrial hygiene and occupational safety and health in the United States; (c) the evolution of knowledge in the industrial hygiene community concerning the potential health hazards associated with exposure to dust and asbestos; (d) the characteristics of asbestos dust and fibers and measurements of airborne concentrations of asbestos dust and fibers; (e) standards, guidelines, procedures and practices relating to the control of potential exposure to dust and asbestos dust; (f) measurement and associated exposures for non-asbestos workers and the general public; (g) industrial hygiene practices and procedures; and (h) DuPont's practices, programs and procedures relating to the health and safety of its employees. Dr. Corn is expected to address these subjects in the context, and also as they relate to DuPont. Dr. Corn is expected to discuss the plaintiffs' allegations by plaintiffs regarding conditions, procedures, and practices at DuPont. Dr. Corn's testimony is based upon (1) his extensive experience and training in the fields of industrial hygiene and occupational health and safety, (2) knowledge of relevant literature, (3) review of documents, discovery, and testimony regarding plaintiffs' allegations, (4) review of relevant DuPont documents; and (5) review of the record in this case.

2. **Richard J. Lee, Ph.D.**
RJ Lee Group
350 Hochberg Road
Monroeville, Pennsylvania 15146
(724)325-1776

Dr. Richard J. Lee is President of the RJ Lee Group, a consulting firm and analytic laboratory in Pittsburgh. Prior to his affiliation with the RJ Lee Group, Dr. Lee was Lead of the U.S. Steel Technical Center's Electron Microscopy and Surface Analysis Section for 12 years. He is a theoretical physicist by training, and received his Ph.D. degree from Colorado State University. Dr. Lee was a member of the Health Effects Institute's Literature Review Panel on Asbestos in Buildings, commissioned by Congress. He has also performed work for the EPA and served on various EPA panels and committees regarding asbestos issues. He has also performed investigations of naturally occurring asbestos and other minerals and methods for detection and identification of such minerals. This has included analysis of bulk, air, water, soil and dust samples.

The subject matters on which Dr. Lee may testify include: (a) the history of the guidelines and standards governing exposure to asbestos; (b) the development of scientific knowledge regarding the measurement of asbestos in the air; (c) the aerodynamics of fibers; (d) exposure levels of various activities in the workplace and in public, commercial and private residences including relevant DuPont facilities; (e) analysis and production of bodies of air and dust for the Environmental Protection Agency and other governmental and private entities regarding naturally occurring forms of asbestos in the environment; (f) the release of asbestos from buildings; and (g) the results of experiments conducted by himself and others.

Dr. Lee is expected to testify based on (1) his extensive experience and training, (2) knowledge of relevant literature and data, (3) review of documents in discovery, and testimony regarding the plaintiffs' allegations, and (4) review of relevant DuPont documents.

3. **Dr. Bruce W. Karrh**
7 Blackhawk Trail
Savannah, Georgia 31411
(912) 598-8992

Dr. Bruce W. Karrh was the Vice President for Integrated Health and Safety for DuPont from 1993 until 1996 when he retired. Dr. Karrh received a Bachelor's degree in Chemistry from the University of Alabama at Tuscaloosa in 1958 and a Medical degree from the Medical College of Alabama in Birmingham in 1962. He entered the United States Army and performed a rotating internship in 1963 at Brooke General Hospital, Fort Sam Houston, Texas. From 1963 to 1965, Dr. Karrh was a flight surgeon in the U.S. Army medical corps, and from 1965 to 1970, he was in private practice in Athens, Alabama. In 1970, Dr. Karrh became the Medical Supervisor for DuPont's Spruance Plant where he remained until 1973. At that time he became the Research Manager of the Environmental Sciences Group at Haskell Laboratory until 1974. DuPont then appointed Dr. Karrh Assistant Medical Director and then Medical Director in 1977. In 1983, Dr. Karrh was named General Director, Medical, Safety and Fire Protection for DuPont. He was then named Vice President for Safety, Health and Environmental Affairs in 1984 - a position he held until 1993.

Dr. Karrh was a long-standing DuPont employee experienced in addressing health and safety-related topics and issues at DuPont. As part of his duties at DuPont, Dr. Karrh gained knowledge, both historical and current, regarding DuPont's history of and practices regarding safety throughout the company. In the course of his duties, Dr. Karrh became familiar with the history of and practices regarding DuPont's approach to workers' safety and health, including exposure to dust and asbestos dust. Much of Dr. Karrh's testimony will be fact testimony; however, he may express opinions in some areas that may be considered expert opinions. Out of an abundance of caution, DuPont is designating Dr. Karrh as an expert because he may be asked to provide such opinions.

Dr. Karrh may testify concerning the following subjects: (a) DuPont's history of providing for health and safety of its employees; (b) policies, procedures and programs for the health and safety of workers including those addressing dust and asbestos dust; (c) medical screening, monitoring and surveillance of DuPont employees; and (d) evolution and understanding of potential health hazards posed by exposures of workers to dust and asbestos dust.

Additional Expert Designations

Plaintiffs have not provided adequate information about their alleged diseases, current medical conditions and testifying experts to allow DuPont to determine which additional experts it may need in this case. Plaintiffs served Answers to Interrogatory Nos. 16, 24 and 25 to Master Discovery Requests on July 23, 2001, listing 69 generic witnesses. However, plaintiffs have not

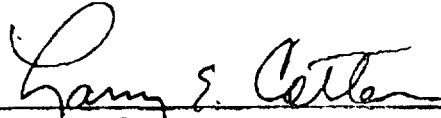
provided reports from their experts regarding what opinions they may assert with respect to DuPont or plaintiffs' claims against DuPont. As recognized by the Texas Rules on discovery and expert designations, DuPont is not in a position to make more extensive expert designations under these circumstances. To require a party to retain and designate experts without the benefit of this essential information puts the party to an undue burden and unnecessary expense. DuPont will amend or supplement this designation, if necessary, after adequate information is provided with respect to plaintiffs' testifying experts.

4. It is anticipated that a radiologist with specialized training and experience in "B" Readings will be necessary to review, interpret and render opinions regarding x-rays of plaintiffs. This expert is expected to testify generally about presentations seen on x-rays and to explain the presentation that is seen. It is also anticipated that this expert would testify specifically about the findings seen on plaintiffs' x-ray films and is anticipated to render an opinion regarding the absence or presence of the findings of any asbestos-related condition of the lung.

5. It is further anticipated that another pulmonologist will be designated to discuss the physical condition of the individual plaintiffs and also to discuss plaintiffs' medical records. This expert is also expected to discuss the anatomy and function of the respiratory system in the human body. This expert is expected to discuss the nature of asbestos, the symptomatology, disease process and diagnosis of asbestosis, as well as cancers associated with the respiratory and related systems. It is also anticipated that this expert will testify regarding the methods of diagnosis of alleged asbestos-related diseases as compared to other non-asbestos related diseases. It is anticipated that this expert will also discuss historical and/or medical literature pertaining to asbestos-related conditions and other diseases of the respiratory and related systems.

6. To the extent any experts designated by other parties are allowed to testify at the trial in this matter, DuPont hereby cross-designates all experts listed by all parties.

Respectfully submitted,



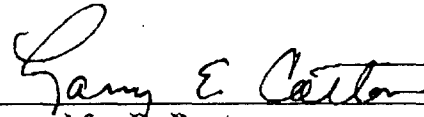
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Attorneys for Defendant
E. I. du Pont de Nemours and Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant E. I. du Pont de Nemours and Company's Designation of Expert Witnesses was served on plaintiffs' counsel by certified mail, return receipt requested, and on all other known counsel by regular mail on this the 20th day of September, 2001.



Counsel for DuPont