



18TH JUDICIAL DISTRICT COURT
PARISH OF IBERVILLE
STATE OF LOUISIANA

LORRAINE PEGGY WILLIAMS

SUIT NO.: 39,404

VERSUS

DIVISION "D"

MCCARTY CORPORATION, ET AL

EXXON CORPORATION'S RESPONSES TO PLAINTIFF'S FIRST
SET OF INTERROGATORIES PROPOUNDED JUNE 19, 1991

Exxon Corporation ("Exxon"), responds to the
"Plaintiff's First Set Of Interrogatories Propounded To Exxon
Corporation June 19, 1991" as follows:

I. GENERAL OBJECTION

Exxon objects to these interrogatories to the extent
that the language contained in the so-called "notice" or
"instruction" portion of the interrogatories exceeds the
provisions of the Louisiana Code of Civil Procedure and, to
that extent, Exxon objects.

Exxon further objects to the extent that the
interrogatories specifically seek information which is in the
possession of attorneys and which might otherwise be covered
by the attorney/client privilege.

Finally, Exxon objects to that portion of the
interrogatories which states that "knowledge of any of your
agents or attorneys or others acting on your behalf shall be
considered and deemed to be knowledge of the defendant." This
portion of the instructions clearly impinges on the
attorney/client privilege and further goes beyond the
requirements of law.

Reserving its rights under all its objections, Exxon
hereby responds to the interrogatories as follows:

INTERROGATORY NO. 1:

Please describe the relationship which Exxon Corporation has with Esso Standard Oil Company, including but not limited to the following:

(1) any acquisition, merger, etc. involving Exxon and Esso Standard Oil Company;

(2) the date(s) of any acquisition, merger, etc. listed in (1), above;

(3) the agents of Exxon and Esso Standard Oil Company who executed any acquisition, merger, etc., listed in (1), above; and

(4) any departmental or procedural changes resulting from any acquisition, merger, etc., listed in (1), above, pertaining to industrial hygiene and safety measures.

RESPONSE TO INTERROGATORY NO. 1

Esso Standard Oil Company is a predecessor company of Exxon. Standard Oil Company of New Jersey, a name by which that corporation was known since August 29, 1927, changed its name to Esso Standard Oil Company on January 28, 1948. Esso Standard Oil Company merged into Humble Oil and Refining Company on December 31, 1959. Humble Oil and Refining Company changed its name to Exxon Corporation on January 1, 1973.

Further responding to the numbered subparagraphs of Interrogatory No. 1, Exxon states:

- (1) None.
- (2) Not applicable.
- (3) Not applicable.
- (4) Not applicable.

INTERROGATORY NO. 2:

Please describe the relationship which Exxon Corporation has with Standard Oil Company, N.J., including but not limited to the following:

(1) any acquisition, merger, etc. involving Exxon and Standard Oil Company, N.J.;

(2) the date(s) of any acquisition, merger, etc. listed in (1), above;

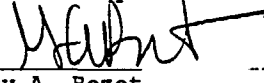
(3) the agents of Exxon and Standard Oil Company, N.J. who executed any acquisition, merger, etc., listed in (1), above; and

(4) any departmental or procedural changes resulting from any acquisition, merger, etc., listed in (1), above, pertaining to industrial hygiene and safety measures.

RESPONSE TO INTERROGATORY NO. 2:

See response to Interrogatory No. 1 above.

Submitted by:



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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, July 22, 1991.



Gary A. Bezet

VERIFICATION

STATE OF TEXAS
COUNTY OF HARRIS

BEFORE ME, undersigned Notary, personally came and appeared:

J. Michael Nussbaum

who, being by me first duly sworn, did depose and state that he is the ATTORNEY of Exxon Corporation and that he has read the foregoing response to interrogatories and that they are true and correct to the best of his knowledge, information and belief.

[Signature]

SWORN TO AND SUBSCRIBED before me, this 17th day of July, 1991.

Jacqueline D. Goome
Notary Public

My commission expires

07-31-93

