

NO. 90G2055

WELDON R. MOAKE, and
JANICE I. MOAKE, ET AL.

VS.

OWENS-CORNING FIBERGLAS
CORPORATION, ET AL.

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IN THE DISTRICT COURT OF

BRAZORIA COUNTY, TEXAS

239TH JUDICIAL DISTRICT

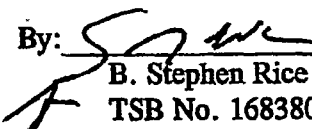
DEFENDANTS COASTAL REFINING & MARKETING, INC.,
COASTAL STATES CRUDE GATHERING COMPANY,
AND UNION PACIFIC RESOURCES COMPANY'S
9/29/00 SUPPLEMENTATION TO RESPONSE TO
PLAINTIFFS' REQUEST FOR DISCLOSURE PERTAINING TO
PERSONS WITH KNOWLEDGE OF RELEVANT FACTS

TO: Plaintiff WELDON R. MOAKE, by and through his attorneys of record, William K. Tapscott, Baron & Budd, The Centrum, Suite 1100, 3102 Oak Lawn Avenue, Dallas, Texas 75219.

COME NOW Defendants, COASTAL REFINING & MARKETING, INC., COASTAL STATES CRUDE GATHERING COMPANY, and UNION PACIFIC RESOURCES COMPANY, f/k/a Champlin Petroleum Company, individually and as successor by merger to Pontiac Refining Corporation, and file this in further supplementation of their response to Request for Disclosure pertaining to persons with knowledge of relevant facts in accordance with Rule 194.2(e), This is in supplement and not in replacement of any prior designations.

Respectfully submitted,

HAYS, McCONN, RICE & PICKERING

By: 

B. Stephen Rice
TSB No. 16838000
400 Two Allen Center
Houston, Texas 77002
(713) 654-1111
FAX (713) 655-9212

Attorney for Defendants COASTAL REFINING &
MARKETING, INC., COASTAL STATES CRUDE
GATHERING COMPANY, and UNION PACIFIC
RESOURCES COMPANY, f/k/a Champlin Petroleum
Company, individually and as successor by merger to
Pontiac Refining Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to counsel for Plaintiffs by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this 2nd day of June, 2000.


B. Stephen Rice

- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

SUPPLEMENTAL RESPONSE:

1. Ralph Coker (current plant manager)
Terry Soule (Director of Environmental Health & Safety)
Dan Rhine (Head of Environmental Health Group)
Val DeLeon (Head of Safety Department)
Rene Borrego (Maintenance, pipefitter and equipment operator)
Bob Jackson (Records)
Denise Hampton (Records)
Coastal Corpus Christi Refinery
1300 Cantwell Lane
Corpus Christi, Texas 78403
361-887-4100

These individuals have knowledge of the current operating policies and procedures of the Coastal Corpus Christi Refinery.

2. David Massie
W.E. "Bill" Hough
Hilario Flores
Noe Soliz
Custodian of Records
Gilman Insulation Company, Inc.
Corpus Christi, Texas

H. Wayne Starkey
3609 Castle Riser
Corpus Christi, TX 78410
361-241-8345

Supervisors and employees of Gilman Insulation. David Massie and Wayne Starkey have knowledge they worked at Gilman Insulation from August, 1973 through the 1990s, and during that time the insulation products Gilman Insulation sold and used did not contain asbestos.

3. M. P. Proctor
7515 Rock Hill
Houston, TX 77061
713-643-1309

F. C. Sheldon, Jr.
4950 Post Oak Timber
Houston, TX 77056
713-622-7683

A.L. Erickson
J. S. Peiffer
Tyson Miller
Custodians of Records
Thorpe Insulation Co. (TICO)
Corpus Christi, Texas
J.T. Thorpe Co./Thorpe Products Co.
Houston, Texas

Employers, supervisors and co-workers of Plaintiff.

4. L.D. Watkins
10402 Birdwood
Corpus Christi, TX 78410
361-241-1647

Marvin E. Wuensche
409 East Elizabeth
Kingsville, TX 78363
361-592-6227

Leroy Verdine
207 Beachwood
Victoria, TX 77901
361-578-2057

Jimmy King
Gerard Dunahoe

James "Red" Ford
303 Magdalena Drive
Victoria, TX 77904
361-575-7863

Michael Dale Byerley
RR2, Box 42 A-1
Mathis, TX 78368
361-547-5561

Weldon R. Moake
1040 Laurel Oak Drive
Flower Mound, TX 75028-1381
972-539-6966

Jack Hoover
2642 Tulane Drive
Corpus Christi, TX 78418
361-937-1989

Jack D. Westbrook
P. O. Box 897
Odem, TX 78370
361-368-9037

Glen A. Curfinan
HC 70, Box 5879
Three Rivers, TX 78071
361-786-3007

David Salinas
P. O. Box 301
Alice, TX 78333
361-777-2269

Lee Roy Cervenka
111 Old Angleton Road
Lake Jackson, TX 77566
409-265-4434

Billy Winston Stevens
114 Perth Road
Victoria, TX 77904
361-572-8281

Leonard Dunahoe
Route 1, Box 723
Aransas Pass, TX 78336
361-776-2249

Morris Wayne Byerley
2519 Robby
Corpus Christi, TX 78410
361-241-1604

John Theodore Kayda, Sr.
1610 Atlanta Street
Deer Park, TX 77536
281-479-8591

Earl Thomas Knighton
160 Briar Drive
Shepherd, TX 77371
281-592-6567

Bartley C. Bauman, Jr.
Route 1, Box 196
Sinton, TX 78387
361-287-3362

Insulators and alleged "co-workers" of Plaintiff.

5. Family of Plaintiff Weldon R. Moake:

Janice I. Moake
1040 Laurel Oak Drive
Flower Mound, TX 75208

Mack K. Moake
601 Knobview Drive
Shelbyville, KY 40065

Dana R. Ashley
5233 Tarton
Corpus Christi, TX 78413

Kevin R. Moake
528 Raintree Circle
Coppell, TX 75019

6. Jim Tansey
3417 Tahiti Drive
Corpus Christi, TX 78418
361-939-9517

Debra Lammons
Anadarko Petroleum Corporation
P. O. Box 7, MS B-01
Fort Worth, TX 76102
817-321-7739

10. J. R. Arevalo
Service Abatement Company
1801 Nueces Bay Blvd.
Corpus Christi, TX 78407
361-888-5803

Insulation abatement contractor.

11. Waste Management, Inc.
3003 Butterfield Road
Oak Brook, IL 60521

Waste transportation and disposal