PLAINTIFF'S EXHIBIT

CEL-1221

CAUSE NO. 00-004978-F

ALBERT JOSEPH BOBB, et al.,	§	IN THE DISTRICT COURT OF
	§	
Plaintiffs,	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
GAF CORPORATION (successor to RUBEROID CORPORATION), et al.,	§	
	§	
Defendants.	§	116th JUDICIAL DISTRICT

DEFENDANT CELANESE LTD.'S RESPONSE
TO PLAINTIFFS' REQUEST FOR RULE 194 DISCLOSURES

In accordance with Rule 194 of the Texas Rules of Civil Procedure, and in response to Plaintiffs' Request for Disclosures, Defendant Celanese Ltd. ("Celanese") provides the following information in relation to Plaintiffs Albert Joseph Bobb, Arnulfo M. Guerra, and Ivory Stafford:

(a) The correct names of the parties to the lawsuit:

Celanese Ltd. is the correct name of this defendant.

(b) The name, address, and telephone number of any potential parties:

At this stage of the suit, Celanese has insufficient information to know if all proper parties are joined.

(c) The legal theories and, in general, the factual bases of the responding party's claims or defenses:

On the basis of the limited information and vague allegations contained in Plaintiffs' Petition, Celanese believes the following affirmative defenses do or may apply to this case:

The sole proximate cause of Plaintiffs' alleged injuries or damages were the acts or omissions of other parties or persons over whom Celanese had no control and for whom Celanese is not legally responsible. No act or omission on the part of Celanese either caused or contributed to Plaintiffs' alleged injuries or damages. Further, Celanese owed Plaintiffs no duty, legal or

otherwise, and is therefore not liable to Plaintiffs for any alleged breach of any alleged duty.

As to any injuries or damages Plaintiffs allege to have incurred, Plaintiffs voluntarily and knowingly assumed the risk of incurring any of the injuries or damages alleged. Additionally, Plaintiffs failed to exercise ordinary care for their own safety, and such failure on their part proximately caused any injuries or damages alleged.

Plaintiffs' claims against Celanese are barred by the applicable statute of limitations and the doctrines of laches and waiver.

Finally, it is unclear from Plaintiffs' Petition if or when Plaintiffs worked at any Celanese facility, and if so, which facility. Assuming Plaintiffs did perform some type of independent contractor work at a Celanese facility, Celanese denies that Plaintiffs were exposed to asbestos at all, or in sufficient quantities to have caused any harm. Celanese believes its plants are and were safe and well-maintained industrial facilities, and there would have been insufficient opportunity for any such exposure.

(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:**

Please refer to the Persons with Knowledge Lists regarding plaintiffs Bobb, Guerra and Stafford, attached hereto as Exhibits A, B, and C, respectively.

(f) **For any testifying expert: 1) the expert's name, address, and telephone number; 2) the subject matter on which the expert will testify; 3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information; 4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party: (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and (B) the expert's current resume and bibliography:**

1. J. LeRoy Balzer, Ph.D., 408 Horse Trail Court, Alamo, California 94507; (925) 274-0826.

Dr. Balzer has a Bachelor of Science degree in Public Health Microbiology and a Master of Science degree in Preventive Medicine/Public Health, which were awarded by the University of California at Los Angeles in 1962 and 1963, respectively. He earned a Doctor of Philosophy degree in

Environmental Health Science/Industrial Hygiene from the University of California at Berkeley in 1971. From 1966 to 1971, he was employed by the University of California School of Public Health as a research associate and research fellow. In 1966, he became involved in a coordinated research program of occupational medicine, industrial hygiene and education of insulation contractors. This intense study of the construction industry was sponsored through grants from the United States Public Health Service and involved observing the work environment of individuals working with asbestos-containing insulation and related products.

Dr. Balzer worked as a certified industrial hygienist from 1973 until 1987 when he became an Assistant Vice Chancellor at the University of California at San Francisco. He retired in 1994 and became a full-time consulting industrial hygienist and was appointed an Assistant Clinical Professor, School of Medicine, University of California Health Sciences. He is a member of the ACGIH (affiliate), AIHA and other professional organizations reflected on Dr. Balzer's curriculum vitae, which has already been provided to Baron & Budd in connection with the May and Dolezal cases. Dr. Balzer may testify at trial of this case live or by deposition.

Dr. Balzer has other personal knowledge of relevant facts based on his field work involving the use of asbestos-containing products and the surrounding occupational environment, but he also possesses general expertise in his field based upon specialized knowledge, skills and training. Dr. Balzer may offer opinions in this case about the general nature of the working environment in industrial locations such as where plaintiff worked, to include testimony regarding the composition and asbestos content, if any, of products used in such environments and the ability of such products to release asbestos fiber under certain conditions. Dr. Balzer may provide testimony on the availability of materials as substitutes for asbestos-containing products. Dr. Balzer will testify regarding an individual's exposure to asbestos from different media, to include circumstances and occupational settings that may result in direct exposure from persons having contact with asbestos- containing products or equipment, circumstances that may result in lower indirect or bystander exposures for others in the working environment. His testimony will be based, in part, on the results of testing which he has performed or reviewed for products which are the same or substantially similar to those which are anticipated to be discussed in this case. Dr. Balzer will also testify about industrial hygiene principles and methodologies used to determine potential hazards related to asbestos exposure, and how those principles and methodologies have changed over time.

Additionally, Dr. Balzer, based on personal knowledge and a review of medical, scientific and/or technical literature, will provide historical state-of-the-art testimony on the gradual development of knowledge within industry and within the field of industrial hygiene about asbestos exposure levels and suitable control measures. Dr. Balzer will address the evolution of workplace

practices available to control exposures to include historical development of the use of respiratory protection in association with the handling of asbestos-containing products. Finally, Dr. Balzer will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of threshold limit values and permissible exposure levels to asbestos developed by professional organizations and government agencies.

2. Lawrence R. Birkner, CIH, CSP, McIntyre, Birkner & Associates, Inc., 2026 El Monte Drive, Thousand Oaks, California 91362-1822; (805) 494-8173.

Mr. Birkner is a certified industrial hygienist and certified safety professional. He received a Bachelor of Science degree from Portland State University in 1973 and a Masters Degree in Occupational Safety and Health at New York University in 1975. Between 1974 - 1976, Mr. Birkner worked closely with Dr. Irvin Selikoff and others at Mount Sinai while employed as a safety and health research specialist at Environmental Sciences Laboratory in New York. From 1976 through 1996, Mr. Birkner worked extensively as a practicing industrial hygienist in American industry; in the course of that employment, Mr. Birkner worked as a corporate industrial hygienist for Celanese Corporation between 1977 - 1981. Mr. Birkner is a fellow of the AIHA and a member of the other professional industrial hygiene organizations reflected on Mr. Birkner's curriculum vitae, which has already been provided to Baron & Budd in connection with the May and Dolezal cases.

Mr. Birkner will provide testimony regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. Mr. Birkner may give testimony regarding the level of fiber release, if any, from asbestos-containing products in the occupational setting and may testify regarding the availability of materials as substitutes for asbestos-containing products. He may testify as to issues involving re-entrainment and fiber drift. Mr. Birkner may also testify regarding work practices applicable to various types of occupations using products that contain asbestos, and he will provide a retrospective assessment or estimate of plaintiff's likely exposure to asbestos in a Celanese work environment based on historical literature and the facts available in this case.

Mr. Birkner has personal knowledge of relevant facts, but he also possesses generalized expertise in his field based on his specialized knowledge, skills and training. He may provide testimony regarding the applicability of the ACGIH, OSHA and EPA guidelines as they relate to occupational exposures to various types of asbestos-containing products. Mr. Birkner may testify regarding the size, construction, layout and working environment of facilities

such as where plaintiff worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of products present in the plaintiff's workplace and may testify concerning the ability of such products to emit asbestos fibers under certain conditions. Mr. Birkner may testify to the dust levels produced by particular occupational operations and products, to include those associated with the use of pipe and block insulation.

Mr. Birkner may testify about the development of literature and information about asbestos-related diseases as they relate to the gradual development of knowledge within industry and within the field of industrial hygiene about asbestos exposure and appropriate control measures. He will address the evolution of workplace practices available to control exposures, to include the historical development of the use of respiratory protection in association with the handling of asbestos-containing products. Mr. Birkner will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of permissible exposure levels to asbestos developed by professional organizations and government agencies. He will discuss his own research into asbestos-related diseases as they relate to industrial hygiene, the carcinogenicity of various fiber types as they relate to industrial hygiene, and the relationship, if any, between asbestos and various diseases. Mr. Birkner will provide testimony regarding the epidemiology of asbestos-related diseases, latency, state-of-the-art, and other related matters as they impact industrial hygiene. Based on the above evidence developed in this case, Mr. Birkner will testify that the plaintiff at issue had little or no opportunity for any harmful exposure to asbestos while working at a Celanese facility because of the nature of plaintiff's occupation and particular working environment, and he will also testify that Celanese's approach to the handling and control of any asbestos-containing materials on its premises were reasonable in light of available information and industrial hygiene practices at different points of time. He may also testify as to any matter raised by experts called by plaintiff or any co-defendants in this action.

3. James D. Crapo, M.D., National Jewish Medical and Research Center, 1400 Jackson Street, Denver, Colorado 80206; (303) 398-1436.

Dr. Crapo received a Bachelor of Science degree from Brigham Young University in 1967 and his medical degree from the University of Rochester New York in 1971. He taught medicine for many years at Duke University in Durham, North Carolina. Dr. Crapo is board certified in internal medicine with a subspecialty certification in pulmonary disease. He presently practices medicine at the National Jewish Medical Center in Denver, Colorado and teaches today at the University of Colorado Health Science Center. Dr. Crapo is a fellow of the American Thoracic Society, the American College of Chest Physicians and other professional organizations reflected on Dr. Crapo's curriculum vitae, which has already been provided to Baron & Budd

in connection with the May and Dolezal cases. Dr. Crapo may testify live or by deposition at trial in this matter.

Dr. Crapo is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity and the potential for asbestos-related disease as a result of exposure to the different types of fiber. Dr. Crapo is also expected to testify as to general medical issues and physiology.

Dr. Crapo's testimony is based in part on the personal knowledge of relevant facts, but he also possesses general expertise is his field based upon specialized knowledge, skills and training. Dr. Crapo is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether such exposure occurred for a sufficient period of time and in a sufficient dose to be of medical consequence, and whether such exposure could be considered a substantial contributing factor to plaintiff's alleged disease. In connection with this, based on his own experience and a review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Crapo will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession of the asbestos-related illnesses. Dr. Crapo may provide testimony regarding the reasonableness of Celanese's usage and control of asbestos at its premises from a medical standpoint based on the developing state of medical knowledge concerning asbestos over time.

Dr. Crapo is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Crapo is expected to testify as to the information necessary to determine whether a group of people or persons are at risk for contracting an asbestos-related disease and if it is scientifically possible to attribute a disease to a particular exposure. Dr. Crapo is expected to discuss epidemiological analysis of asbestos-related disease in the context of given levels of exposure, and to discuss how such analysis may be applied to the evidence regarding the plaintiff in this case.

Finally, Dr. Crapo may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Crapo may also testify regarding the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Crapo may also testify about any matter raised by experts called by plaintiff or any co-defendant, to include but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

4. Dorsett D. Smith, M.D., 4310 Colby Avenue, Suite 201, Everett, Washington 98203; (425) 259-5171.

Dr. Smith received his Bachelor of Arts degree from Colgate University in 1959 and his medical degree from the University of Pennsylvania Medical School in 1963. Dr. Smith is board certified in internal medicine with a subspecialty certification in pulmonary disease. Dr. Smith has taught medicine at Johns Hopkins Hospital and the University of Washington Hospital for many years through the present. Dr. Smith is a NIOSH certified "B" reader and is fellow of the American Thoracic Society, the American College of Chest Physicians, the American College of Occupational and Environmental Medicine and other professional organizations reflected on Dr. Smith's curriculum vitae, which has already been provided to Baron & Budd in connection with the May and Dolezal cases.

Dr. Smith will testify about the pathology of asbestos-related diseases, his research into asbestos-related diseases, the carcinogenicity of various asbestos fiber types, the potential for asbestos-related disease as a result of exposures to the different types of fibers and the relationship, if any, between asbestos and various illnesses. Dr. Smith will also testify regarding the general pulmonary aspects of asbestos exposure, including matters such as dose response, latency and the required fiber burden associated with asbestos-related illnesses. Dr. Smith is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether, based on his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, whether any exposure at a facility owned or operated by Celanese could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Smith has personal knowledge of certain relevant facts but also possesses general expertise in his field based upon specialized knowledge, skills and training. Based upon his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Smith will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession about the various diseases associated with asbestos and about the asbestos exposure levels thought to be associated with each disease. Dr. Smith will testify regarding the reasonableness of Celanese's historical usage and control of asbestos in its workplace from a medical standpoint based on the information available in the general medical literature and on the types of preventative measures considered by the general medical community as appropriate in the different decades from 1900 through the present.

Dr. Smith is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable

to other groups or occupations. Dr. Smith is expected to testify as to the information necessary to determine whether a group of people are at risk of contracting a particular asbestos-related disease, and whether it is scientifically possible to attribute a disease to a particular exposure. Dr. Smith is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the evidence in this case and to the plaintiff.

Dr. Smith may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Smith is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

5. Mark R. Stenzel, CIH, P.O. Box 850235, Richardson, Texas 75085-0235; (972) 404-3207.

Mr. Stenzel is a practicing certified industrial hygienist. He holds a Bachelor of Science degree in mathematics and chemistry and a Master of Science degree in physical chemistry, which he received from the University of Illinois in 1975. In 1973, Mr. Stenzel was hired by Celanese Chemical Company and worked as a lab chemist/health chemist at its Pampa plant, where he performed industrial hygienist duties to include air monitoring. He became a certified industrial hygienist for Celanese. In that capacity, he had direct contact with each plant in the company and was the hygiene personnel at the plant, company and corporate levels. In 1983, Mr. Stenzel became Manager of Industrial Hygiene for Celanese and held that position through 1992. Since 1992, he has been otherwise employed in industry as an industrial hygienist. Mr. Stenzel is a member of the AIHA, the American Academy of Industrial Hygienists and other professional organizations reflected on Mr. Stenzel's curriculum vitae, which has already been provided to Baron & Budd in connection with the May and Dolezal cases. Mr. Stenzel may testify at trial live or by deposition.

Most of Mr. Stenzel's testimony will be factual in nature and will address the development of Celanese's industrial hygiene and environmental, safety and health programs from their inception through the 1980s. However, this disclosure is made in an abundance of caution because Mr. Stenzel also possesses general expertise in his field based upon specialized knowledge, skills and training, and some areas of his testimony may be informed by professional judgment and opinion. Mr. Stenzel will address the nature and structure of Celanese's industrial hygiene programs and the industrial hygiene and occupational safety practices adopted at Celanese facilities over time. From a review of company documents and other materials, Mr. Stenzel will testify about air monitoring for asbestos exposure and other workplace

substances conducted at Celanese plants and the low exposures/low risk levels indicated by the available monitoring data.

From 1977 forward, Mr. Stenzel was intimately involved in the creation and design of Celanese's Health Monitoring System, to include its worker tracking module, health monitoring module and retrospective exposure assessment module. Mr. Stenzel piloted the worker tracking module, health monitoring module and retrospective exposure assessment module. Mr. Stenzel piloted the worker tracking module at the Pampa plant and helped implement all modules at other Celanese facilities between 1978 – 1981. Mr. Stenzel will testify that the system was state-of-the-art at the time and would be considered state-of-the-art today.

Based on a review of plant and company documents, Mr. Stenzel will testify about how each module system was implemented throughout the company and at each company plant. Mr. Stenzel will provide testimony regarding the correlation of worker tracking exposure data and retrospective exposure data with the alleged exposure claimed by plaintiff. Based on his assessment of these materials, Mr. Stenzel is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and the potential risk for developing an occupational disease associated with that exposure. Finally, Mr. Stenzel may provide testimony regarding mortality studies and similar disease assessments which involved the workforce employed at Celanese's plants. The nature of those studies are referenced in the attached curriculum vitae.

6. Ernest M. Dixon, M.D., Sc.D., 6305 Evermay Drive, McLean, Virginia 22101.

Dr. Dixon received his medical degree from the University of Virginia in 1948 and a doctorate in occupational health from the University of Cincinnati in 1957. Dr. Dixon has held various occupational health positions in industry and served as Celanese's corporate medical director from 1966 - 1981. A curriculum vitae is available upon request. Dr. Dixon may testify at trial in this case live or by deposition.

Dr. Dixon's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's occupational health, industrial hygiene and environmental program from their inception through the 1980s. Dr. Dixon will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the occupational health and safety practices adopted at Celanese's facilities over time. Dr. Dixon will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's occupational health and safety programs were well developed and advanced for their time; that the potential for asbestos exposure at each plant over time was extremely low; and that no worker present at any Celanese plant was considered to be at risk of incurring any asbestos-related illness based on the

information reasonably available to the occupational health community during his period of responsibility.

Dr. Dixon's testimony will be factual in nature based on personal knowledge in relevant areas. However, Dr. Dixon also possesses general expertise in the fields of medicine and occupational health based on specialized knowledge, skills and training. This disclosure is made in an abundance of caution because certain aspects of Dr. Dixon's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

7. Mr. Charles S. Laubly, 2225 North Tucson Boulevard, Tucson, Arizona 85716.

Mr. Laubly received a Bachelor of Science degree from Georgia Tech in 1949. Mr. Laubly worked as field industrial hygienist thereafter and was employed as a corporate industrial hygienist by Celanese between 1967 - 1979. A curriculum vitae is available upon request. Mr. Laubly may testify at trial in this case live or by deposition.

Mr. Laubly's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's industrial hygiene and environmental programs from their inception through the 1980s. Mr. Laubly will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the industrial hygiene and safety practices adopted at Celanese's facilities over time. Mr. Laubly will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's industrial hygiene and safety programs were well developed and advanced for their times; that the usage of asbestos at Celanese's facilities were relatively minor and that the potential for asbestos exposure at each plant over time was extremely low; and that no worker present at any Celanese plant was considered to be at risk of incurring any asbestos-related illness based on the information reasonably available to the occupational health community during his period of responsibility.

Mr. Laubly's testimony will be factual in nature based on personal knowledge in relevant areas. However, Mr. Laubly also possesses general expertise in the field of industrial hygiene based on education, training and experience. This disclosure is made in an abundance of caution because certain aspects of Mr. Laubly's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

8. Herbert J. Kolodner, Ph.D.,P.E., 777 Pebble Beach Drive, Crescent City, California 95331-3634.

Dr. Kolodner received a Master's degree in safety from the University of Maryland in 1960 and a doctorate in industrial safety from New York

University in 1973. Dr. Kolodner has held various safety positions in industry and served as Celanese's corporate safety director from 1970 - 1984. A curriculum vitae is available upon request. Dr. Kolodner may testify at trial in this case live or by deposition.

Dr. Kolodner's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's occupational safety and environmental programs from their inception through the 1980s. Dr. Kolodner will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the safety practices adopted at Celanese's facilities over time. Dr. Kolodner will testify that Celanese's plants over time were extremely clean, well maintained and safe premises; that Celanese's safety programs were well developed and advanced for their times; that the usage of asbestos at Celanese's facilities were relatively minor and the potential for asbestos exposure at each plant over time was extremely low.

Dr. Kolodner's testimony will be factual in nature based on personal knowledge in relevant areas. However, Dr. Kolodner also possesses general expertise in the field of industrial hygiene based on education, training and experience. This disclosure is made in an abundance of caution because certain aspects of Dr. Kolodner's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

9. Carrol W. Whaley, CIH, CSP, 3403 Yerba Buena Road, San Jose, CA 95135.

Mr. Whaley has held various occupational health and industrial hygiene positions in industry and served as Celanese's plant industrial hygienist at the Bay City facility from 1978 - 1985. A curriculum vitae is available upon request. Mr. Whaley may testify in this case live or by deposition.

Mr. Whaley's anticipated testimony in this matter is expected to be factual in nature and will address the development of Celanese's industrial hygiene and environmental program at the Bay City plant during his employment there. Mr. Whaley will provide testimony regarding the nature and structure of those programs and, from his own experience and observations, the occupational health and safety practices adopted at the facility over time. Mr. Whaley will testify that the Bay City plant over time was an extremely clean, well maintained and safe premises; that Celanese's industrial hygiene and safety programs are well developed and advanced for their time; that the usage of asbestos at Bay City was relatively minor and that the potential for asbestos exposure at each plant over time was extremely low; and that no worker present at any Bay City plant was considered to be at risk of incurring any asbestos-related illness based on the information reasonably available to the occupational health community during his period of responsibility. Mr. Whaley may also provide testimony regarding development and implementation of the

health monitoring system at Bay City, to include the retrospective exposure module.

Mr. Whaley's testimony will be factual in nature based on personal knowledge in relevant areas. However, Mr. Whaley also possesses general expertise in the field of industrial hygiene and occupational health based on specialized knowledge, skills and training. This disclosure is made in an abundance of caution because certain aspects of Mr. Whaley's anticipated testimony may be said to involve the exercise of professional judgment and/or the expression of professional opinion.

10. William L. Dyson, PhD., C.I.H., Workplace Hygiene, llc, 1022 Jefferson Road, Greensboro, North Carolina 27140

Dr. Dyson is a certified industrial hygienist. He received a bachelor of science degree from North Carolina State University in 1973, a master's degree in environmental health engineering from Northwestern University in 1971, and received his doctorate in environmental health engineering from Northwestern University in 1975. From 1967 through 1969, Dr. Dyson worked as a field industrial hygiene engineer for the U.S. Public Health Service providing industrial hygiene services to the public. From 1973 through 1982, Dr. Dyson worked extensively as a practicing industrial hygienist in American industry. Dr. Dyson has worked as a self-employed industrial hygiene consultant from that time through the present. Dr. Dyson is a fellow of the AIHA, a member of the American Academy of Industrial Hygiene, a diplomat of the American Board of Industrial Hygiene, a member of the American Society of Safety Engineers and other professional organizations reflected on the curriculum vitae of Dr. Dyson, which was produced to Baron & Budd in the Vicente Rodriguez case.

Dr. Dyson will provide testimony regarding the history of industrial hygiene, industrial hygiene methods, exposure levels which trigger diseases associated with dust exposure, good housekeeping measures, and other related matters. He is prepared to testify about respirator history, what constitutes good hygiene practice, and the periods of time from an industrial hygiene standpoint when people and companies became aware of associated health risks. Dr. Dyson may give testimony regarding the level of fiber release, if any, from asbestos-containing products in the occupational setting and may testify regarding the availability of materials as substitutes for asbestos-containing products. He may testify as to issues involving re-entrainment and fiber drift. Dr. Dyson may also testify regarding work practices applicable to various types of occupations using products that contain asbestos, and he will provide a retrospective assessment or estimate of plaintiff's likely exposure to asbestos in a Celanese work environment based on historical literature and the facts available in this case.

Dr. Dyson has personal knowledge of relevant facts, but he also possesses

generalized expertise in his field based on his specialized knowledge, skills and training. He may provide testimony regarding the applicability of the ACGIH, OSHA and EPA guidelines as they relate to occupational exposures to various types of asbestos-containing products. Dr. Dyson may testify regarding the size, construction, layout and working environment of facilities such as where plaintiff worked. He may testify about the nature of the working environment in such locations. He may testify about his knowledge of the composition and asbestos content, if any, of products present in the plaintiff's workplace and may testify concerning the ability of such products to emit asbestos fibers under certain conditions. Dr. Dyson may testify to the dust levels produced by particular occupational operations and products, to include those associated with the use of pipe and block insulation.

Dr. Dyson may testify about the development of literature and information about asbestos-related diseases as they relate to the gradual development of knowledge within industry and within the field of industrial hygiene about asbestos exposure and appropriate control measures. He will address the evolution of workplace practices available to control exposures, to include the historical development of the use of respiratory protection in association with the handling of asbestos-containing products. Dr. Dyson will testify regarding the development over time of governmental standards and regulations pertaining to asbestos, to include the historical evolution of permissible exposure levels to asbestos developed by professional organizations and government agencies. He will discuss his own research into asbestos-related diseases as they relate to industrial hygiene, the carcinogenicity of various fiber types as they relate to industrial hygiene, and the relationship, if any, between asbestos and various diseases. Dr. Dyson will provide testimony regarding the epidemiology of asbestos-related diseases, latency, state-of-the-art, and other related matters as they impact industrial hygiene. Based on the above evidence developed in this case, Dr. Dyson will testify that the plaintiff at issue had little or no opportunity for any harmful exposure to asbestos while working at a Celanese facility because of the nature of plaintiff's occupation and particular working environment, and he will also testify that Celanese's approach to the handling and control of any asbestos-containing materials on its premises were reasonable in light of available information and industrial hygiene practices at different points of time. He may also testify as to any matter raised by experts called by plaintiff or any co-defendants in this action.

11. William G. Hughson, M.D., PhD., Center for Occupational and Environmental Medicine, UCSD Medical Center, 200 West Arbor Drive, San Diego, California 92103-8800

Dr. Hughson received his bachelor of science degree from the University of Calgary in 1970 and his medical degree from that same institution in 1973. He received his doctorate in epidemiology from Oxford University in 1977. Dr. Hughson is board certified in internal medicine with subspecialty certifications

in pulmonary medicine and occupational medicine. Dr. Hughson has taught medicine at the University of California, San Diego for many years through the present. Dr. Hughson is a fellow of the American Thoracic Society, The American College of Chest Physicians, The American College of Occupational and Environmental Medicine and other professional organizations reflected on Dr. Hughson's curriculum vitae, which was produced to Baron & Budd in the Vicente Rodriguez case.

Dr. Hughson will testify about the pathology of asbestos-related diseases, his research into asbestos-related diseases, the carcinogenicity of various asbestos fiber types, the potential for asbestos-related disease as a result of exposures to the different types of fibers and the relationship, if any, between asbestos and various illnesses. Dr. Hughson will also testify regarding the general pulmonary aspects of asbestos exposure, including matters such as dose response, latency and the required fiber burden associated with asbestos-related illnesses. Dr. Hughson is expected to testify about alleged occupational exposure – as described by plaintiff and plaintiff's witnesses – and whether, based on his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, whether any exposure at a facility owned or operated by Celanese could be considered a substantial contributing factor to plaintiff's alleged disease.

Dr. Hughson has personal knowledge of certain relevant facts but also possesses general expertise in his field based upon specialized knowledge, skills and training. Based upon his own experience and his review of the medical, scientific and/or technical literature and the opinions and conclusions contained in that literature, Dr. Hughson will provide historical state-of-the-art testimony on the gradual development of knowledge within the medical profession about the various diseases associated with asbestos and about the asbestos exposure levels thought to be associated with each disease. Dr. Hughson will testify regarding the reasonableness of Celanese's historical usage and control of asbestos in its workplace from a medical standpoint based on the information available in the general medical literature and on the types of preventative measures considered by the general medical community as appropriate in the different decades from 1900 through the present.

Dr. Hughson is expected to testify about the principles of epidemiology and what is involved in an epidemiologic study. He is expected to testify that studies of particular groups or occupations of people are not necessarily applicable to other groups or occupations. Dr. Hughson is expected to testify as to the information necessary to determine whether a group of people are at risk of contracting a particular asbestos-related disease, and whether it is scientifically possible to attribute a disease to a particular exposure. Dr. Hughson is expected to discuss epidemiological analysis of asbestos and how such analysis may be applied to the evidence in this case and to the plaintiff.

Dr. Hughson may testify regarding plaintiff's medical condition, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Hughson is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases.

12. Peter J. Barrett, M.D., 300 Boylston Street, Suite 714, Boston, Massachusetts 02116-3923

Dr. Barrett received his bachelor of arts degree from the College of The Holy Cross in 1964 and his medical degree from Tufts University School of Medicine in 1968. Dr. Barrett is board certified in diagnostic radiology and nuclear medicine. Dr. Barrett has taught radiology at Harvard University and at other institutions over the years. He is a NIOSH certified "B" reader and is a fellow of the American Thoracic Society, the American College of Chest Physicians, the American College of Radiology and other professional organizations reflected on Dr. Barrett's curriculum vitae, which was produced to Baron & Budd in the Vicente Rodriguez case.

Dr. Barrett is expected to testify generally about radiologic concepts and evaluation and their relation to the diagnosis of pulmonary diseases. He will testify specifically regarding his evaluation of x-rays and CT scans in the diagnosis of occupational pneumoconiosis. It is anticipated that Dr. Barrett will testify generally as to his interpretation of the plaintiff's chest images, the presence or absence of any asbestos-related condition as evidenced by those films, and the presence of other abnormalities or conditions unrelated to any exposure to asbestos. In addition, Dr. Barrett is expected to testify generally about the pulmonary affects of asbestos exposure including matters such as dose response, pathogenicity, carcinogenicity and the potential for asbestos-related disease as a result of exposure to the different types of fibers. Dr. Barrett may testify regarding plaintiff's general medical condition, cigarette smoking history and lung disease, and generally about the pulmonary system and its functions as well as the diagnosis and prognosis of asbestos-related markers and diseases, and the risks associated with developing cancers. Dr. Barrett is also expected to testify about any matter raised by experts called by plaintiff or any co-defendant, including but not limited to plaintiff's medical condition, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases. In that sense, his testimony may be dependent upon the prior testimony of other experts and cannot be specifically predicted. Dr. Barrett may testify live at trial or by deposition transcript.

13. John R. Holcomb, M.D. 4410 Medical Drive, San Antonio, Texas 78229-0373; (210) 692-9400

Dr. Holcomb will testify concerning examination and diagnosis of the physical condition of the plaintiff and/or his medical records. He may testify concerning the overall condition and the relationship of plaintiff's condition, if any, to plaintiff's exposure to asbestos. He may also testify concerning (a) anatomy and function of the respiratory and circulatory systems; (b) nature of asbestos; (c) the symptomatology, disease process and diagnosis of asbestosis and cancer associated with respiratory system, peritoneum, and peritoneal cavity; (d) the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; (e) the effect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; (f) methods of diagnosis of various diseases, particularly the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos related diseases; (g) incidence of lung cancer among individuals with asbestosis compared with non-asbestotic asbestos workers and with the general population; (h) cigarette smoking and its effects on the lung; (i) the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect; (j) difference between impairment and disability; (k) effect of asbestosis on disability and life expectancy; (l) the lack of a relationship between the presence of pleural plaques and a later development of any form of cancer; and (m) historical and/or medical literature. Dr. Holcomb's C.V. has already been provided to Baron & Budd in connection with the May and Dolezal cases.

14. Subject to the right to object to and contest qualifications and admissibility as provided in the Texas Rules of Evidence 702 through 705 and the law of this state, Defendant cross-designates plaintiffs' expert witnesses as follows:

a) Those expert witnesses designated by plaintiffs in Plaintiffs' Disclosures Pursuant to Texas Rule of Civil Procedure 194 filed on September 18, 2000.

b) Peter A. Petroff, M.D., F.A.C.P., F.C.C.P.
Santa Rosa Northwest Tower II
2833 Babcock Rd., Suite 435
San Antonio, Texas 78229
(210) 614-5855
(210) 614-6240
Plaintiff Guerra's diagnosing physician

c) Gail Blakley, M.D.
Milby Clinic, P.A.

215 Milby St.
Houston, Texas 77003
(713) 225-0463
Plaintiff Stafford's diagnosing physician

d) Robert R. Springer, M.D., F.C.C.P.
Sleep & Lung Consultants of Texas, P.A.
307 Londonderry Drive
Waco, Texas 76712
(254) 741-6767
Plaintiff Bobb's diagnosing physician

15. Subject to the right to object to and contest qualifications and admissibility as provided in the Texas Rules of Evidence 702 through 705 and the laws of this state, Defendant designates the following treating physicians of plaintiffs:

As to plaintiff Bobb:

a) Dr. Robert Pringle
13310 Beamer Road
Houston, Texas
or
2409 Ridgwood St.
Houston, Texas 77006
(713) 874-0751

b) Physicians at Madigan Army Medical Center
9040 Gardner Loop & Jackson
Tacoma, Washington 98431
(253) 968-1110

c) Physicians at St. Joseph Hospital
1919 La Branch
Houston, Texas 77002
(713) 757-1000

As to plaintiff Stafford:

a) Dr. Leroy Odom
2000 Crawford, Suite 1300
Houston, Texas 77002
(713) 658-8660

b) Physicians at Ben Taub General Hospital
1504 Taub Loop
Houston, Texas 77030
(713) 793-2000

c) Physicians at Park Plaza Hospital
1313 Hermann Drive
Houston, Texas 77004
(713) 527-5007

d) Physicians at unknown hospital
Pasadena, Texas

As to plaintiff Guerra:

a) Dr. Lowell E. Wilder
Taylor Road
Falfurrias, Texas 78355
(361) 325-2393

b) Physician's at Doctor's Hospital
3315 South Alameda St.
Corpus Christi, Texas
(361) 761-1400

16. Defendant further cross-designates any and all experts designated by other defendants in this action.

Defendant reserves the right to amend or supplement this disclosure pursuant to Rule 193.5 of the Texas Rules of Civil Procedure. Defendant further reserves the right to call undesignated expert witnesses in rebuttal, whose identities and testimony cannot reasonably be foreseen until plaintiff's named experts provide written reports in this case and/or have presented testimony and evidence at trial.

(h) Any discoverable indemnity and insuring agreements:

Celanese is investigating to determine whether any such agreements exist. Celanese reserves the right to supplement.

(i) Any discoverable witness statements:

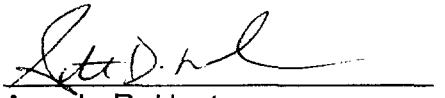
None.

(k) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party:

None at present.

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via United States certified mail, return receipt requested, on counsel for plaintiffs on this 18th day of June, 2001.

Scott D. Nelson

EXHIBIT A

ALBERT JOSEPH BOBB, et al v. GAF CORPORATION, et al
In the F-116th Judicial District of Dallas County, Texas;
Cause No. 00-004978-F

PERSONS WITH KNOWLEDGE
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Laura Rice
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Fred Bell
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James Evans
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Gary Landry
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PLAINTIFF'S DESIGNATED EXPERTS:

All experts designated by Plaintiff in Plaintiffs' Disclosures Pursuant to Texas Rule of Civil Procedure 194 filed on September 18, 2000

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Waco, Texas 76712
(254) 741-6767

DEFENDANT CELANESE LTD.'S DESIGNATED EXPERTS:

See Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a listing of Celanese Ltd.'s expert witnesses

DEFENDANT CELANESE LTD.'S FACT WITNESSES:

Lawrence Birkner, CIH, CSP
McIntyre, Birkner & Associates, Inc.
2026 El Monte Drive
Thousand Oaks, California 91362-1822
(805) 494-8173
See Defendant Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a summary of Mr. Birkner's areas of knowledge.

T. Rogers Shandley
234 Turpin Drive
Lewisville, Texas 75077
Knowledge regarding purchase of asbestos-containing materials by Celanese and the plants and the discontinuation therof.

Mark R. Stenzel, CIH
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Richardson, Texas 75085-0235

Ernest M. Dixon, M.D., Sc.D.
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Charles S. Laubly
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Herbert J. Kolodner, Ph.D., P.E.
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Crescent City, California 95331-3634

See Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a summary of Messrs. Dixon, Laubly, Stenzel, and Kolodner's areas of knowledge.

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Sidney Howe
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Zeb Wilcox
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Baytown, Texas 77521
Telephone number unknown

The foregoing fact witnesses have or may have knowledge of the historical evolution of the Deer Park plant, the presence or absence of asbestos-containing materials at that facility, the nature and types of maintenance activities and construction work performed at the Deer Park plant, the plant's use of and interaction with independent contractors, the evolution and nature of general safety policies and procedures followed at the site, and the implementation and nature of asbestos-related policies and procedures at the Deer Park plant.

EXHIBIT B

ALBERT JOSEPH BOBB, et al v. GAF CORPORATION, et al
In the F-116th Judicial District of Dallas County, Texas;
Cause No. 00-004978-F

PERSONS WITH KNOWLEDGE
Arnulfo Guerra

PLAINTIFF AND PLAINTIFF'S RELATIVES:

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PLAINTIFF'S CO-WORKERS:

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PLAINTIFF'S DESIGNATED EXPERTS:

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DEFENDANT CELANESE LTD.'S DESIGNATED EXPERTS:

See Celanese Ltd.'s Response to Plaintiffs' Request for Ruile 194 Disclosures, part (f) for a listing of Celanese Ltd.'s expert witnesses

DEFENDANT CELANESE LTD.'S FACT WITNESSES:

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See Defendant Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures part (f) for a summary of Mr. Birkner's areas of knowledge.

T. Rogers Shandley
234 Turpin Drive
Lewisville, Texas 75077
Knowledge regarding purchase of asbestos-containing materials by Celanese and the plants and the discontinuation thereof.

James Jackson
1117 Clarion
Corpus Christi, Texas 78412

Ann Retherford
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Bishop, Texas 78343

James Pritchard
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Bishop, Texas 78343

Messrs. Jackson & Pritchard and Ms. Retherford have knowledge regarding asbestos-related safety and industrial hygiene programs in relation to Celanese's Bishop plant.

Kenneth Hajek
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Bishop, Texas 78343
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Knowledge regarding interface between Celanese and independent contractors and the monitoring of them at Celanese's Bishop plant.

James Barrington
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Knowledge regarding interface between Celanese and independent contractors and the monitoring of them at Celanese's Bishop plant.

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See Defendant Celanese Ltd.'s Response to Plaintiff's Request for Rule 194 Disclosures, part (f) for a summary of Messrs. Dixon, Laubly, Stenzel, and Kolodner's areas of knowledge.

Custodian of Records for Celanese Ltd.
Bishop Plant
Highway 77 South
Bishop, Texas 78343
(512) 584-6000
Knowledge regarding authenticity of and foundation for records and documents.

EXHIBIT C

ALBERT JOSEPH BOBB, et al v. GAF CORPORATION, et al
In the F-116th Judicial District of Dallas County, Texas;
Cause No. 00-004978-F

PERSONS WITH KNOWLEDGE
Ivory Stafford

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B.N. Adams Electric Company, Inc.
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Jerry Bonner
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Joe Oakley
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Asa Albert
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PLAINTIFF'S DESIGNATED EXPERTS:

All experts designated by Plaintiff in Plaintiffs' Disclosures Pursuant to Texas Rule of Civil Procedure 194 filed on September 18, 2000

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DEFENDANT CELANESE LTD.'S DESIGNATED EXPERTS:

See Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a listing of Celanese Ltd.'s expert witnesses

DEFENDANT CELANESE LTD.'S FACT WITNESSES:

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See Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a summary of Mr. Birkner's areas of knowledge.

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See Celanese Ltd.'s Response to Plaintiffs' Request for Rule 194 Disclosures, part (f) for a summary of Messrs. Dixon, Laubly, Stenzel, and Kolodner's areas of knowledge.

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Sidney Howe
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Center Point, Texas
Telephone number unknown

Zeb Wilcox
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Baytown, Texas 77521
Telephone number unknown

The foregoing fact witnesses have or may have knowledge of the historical evolution of the Deer Park plant, the presence or absence of asbestos-containing materials at that facility, the nature and types of maintenance activities and construction work performed at the Deer Park plant, the plant's use of and interaction with independent contractors, the evolution and nature of general safety policies and procedures followed at the site, and the implementation and nature of asbestos-related policies and procedures at the Deer Park plant.