



SCHEDULE "A"
DOCUMENTS TO BE PRODUCED AT DEPOSITION

1. The deponent's current curriculum vitae and any other documents specifying the deponent's background or identifying the factors that qualify him as an expert in the field in which his testimony is sought in this matter.
2. A list of all publications by the deponent, if not included on the curriculum vitae.
3. The deponent's entire file regarding this case.
4. All factual materials, including all writings, documents, or information of any type provided to the deponent concerning any issues, allegations or other matters relating to this case.
5. A list of all scientific literature, medical records (including, but not limited to, written reports and notes) and all other sources of information upon which the deponent has relied on in reaching his opinions.
6. All drafts and final reports and/or writings which the deponent has prepared, of any description, concerning this case, or the facts underlying this case.
7. Records of all medical evaluations, laboratory analyses, and other medical investigations in the deponent's possession.
8. Any documents upon which you will rely to offer any opinions regarding this case.
9. Any material which you prepared in conjunction with testing done on any products about which you will testify in this litigation.
10. A list of all cases in which the deponent has testified, either at trial or in deposition.
11. A list of all cases in which the deponent has been retained in an asbestos personal injury case, and a copy of any deposition or trial transcript which contains his testimony in any such case.
12. All drawings, charts, exhibits, photographs, or videotapes made by the deponent or on the deponents's behalf, given to the deponent, or considered by the deponent with regard to this case or any test or study relevant to this case.
13. Copies of any and all correspondence between you and defendant's counsel, the defendant, or anyone else concerning this case.