PLAINTIFF'S EXHIBIT

TEX-14

NO. 96-333

IRMA BUSTAMANTE, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE HEIRS AND ESTATE OF JOSE PERALTA, DECEASED	§	IN THE COUNTY COURT
VS.	§	AT LAW NO. THREE
OWENS CORNING (A/K/A OWENS CORNING CORPORATION), ET AL	§	EL PASO COUNTY, TEXAS

CHEVRON U.S.A. INC.'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S MATER SET OF INTERROGATORIES

TO: Plaintiff, IRMA BUSTAMANTE, by and through her attorney of record, Lou Thompson, Baron & Budd, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

NOW COMES CHEVRON U.S.A., INC., Defendant herein, and makes and files this its Supplemental Response to Plaintiffs' Master Set of Interrogatories

Respectfully submitted,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.

David W. Ledyard
State Bar No. 12109400
Michael T. Bridwell
State Bar No. 02979600
14th Floor, San Jacinto Building
Beaumont, Texas 77701-3255
(409)981-1000
(409)981-1010 Facsimile

ATTORNEYS FOR DEFENDANT,
CHEVRON U.S.A. INC.

INTERROGATORY:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufactures, miners, marketers, and/or sellers of asbestos products?

RESPONSE:

In addition to all previous objections which are incorporated herein, Defendant objects to this interrogatory as overly broad, overly burdensome and not limited in time nor scope. Defendant further objects to this interrogatory as it calls for information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the foregoing, see attached documents: CHEV BB 015790-01809.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Chevron U.S.A. Inc.'s Second Supplemental Response to Request for Production is being furnished to Plaintiff's counsel by certified mail, return receipt requested on this the 22nd day of June, 2001.

Michael T. Bridwell

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Ralph Schneider, M.D. . . . . Standard Oil Co. (New Jersey), 30 Rock-
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New York 19, New York

E. R. Ware, M.D. . . . . Union Oil Co. of California, Room 309
Union Oil Bldg., Los Angeles 17, Calif.

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AMERICAN PETROLEUM INSTITUTE

50 WEST 50TH STREET

NEW YORK 20, N. Y.

DEPARTMENT OF TECHNICAL SERVICES
DAVID V. STROOP, DIRECTOR

January 24, 1956

To Members
Medical Advisory Committee

Gentlemen:

Your chairman, L. E. Curtis, M. D., has appointed the Medical Advisory Committee subcommittees for 1956 with officers and members as follows:

1) Operating Subcommittee

Chairman	- L. E. Curtis, M. D.
Vice Chairman	- V. C. Baird, M. D.
Secretary	- F. D. Gassaway, M. D.
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	- C. H. Hine, M. D.
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	- E. K. Linder, M. D.
	- J. W. Osborn, M. D.
	- G. M. Saunders, M. D.

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	- E. K. Daniels
	- J. W. Hammond
	- C. H. Hine, M. D.
	- E. P. Luongo, M. D.
	- C. R. Miller, M. D.

4) Subcommittee on C_9 - C_{12} Aromatics

Chairman	- C. H. Hine, M. D.
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	- R. D. Bent
	- J. W. Crookshank, M. D.
	- Kieffer Davis, M. D.
	- Robert E. Eckardt, M. D.
	- T. M. Frank, M. D.
	- R. J. Potts, M. D.
	- Jack Spence

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	- C. H. Hine, M. D.
	- E. K. Linder, M. D.
	- R. C. Mithoff
	- M. N. Newquist, M. D.
	- A. C. Pabst

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	- Allan Dooley
	- E. K. Linder, M. D.
	- M. N. Newquist, M. D.

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	- Ralph Schneider, M. D.

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	- T. J. Kelly, M. D.
	- E. K. Linder, M. D.
	- E. R. Ware, M. D.

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	- Kieffer Davis, M. D.
	- Paul D. Halley
	- J. W. Osborn, M. D.
	- Robert J. Potts, M. D.
	- Nathan Van Hendricks

10) Subcommittee on Toxicological Reviews

Chairman	- Marshall Clinton, M. D.
	- V. C. Baird, M. D.
	- L. C. Beard

For your convenient references, MAC liaison and representation with or on other committees or groups are listed as follows:

1) Joint Committee for Dermatitis Study
Representing Medical Advisory Committee
Lamson Blaney, M. D.
E. K. Linder, M. D.
M. N. Newquist, M. D.
Leo J. Wade, M. D.

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N. J. Gothard
K. G. Mackenzie
J. B. Tuttle

2) Liaison with medical committee of The Asphalt Institute (cancer study)
Medical Advisory Committee liaison
Robert E. Eckardt, M. D.

3) Liaison with Smoke and Fumes Committee
API Division of Refining
Medical Advisory Committee liaison through Chairman, Subcommittee on Atmospheric Pollutants.

4) American Standards Association
Medical Advisory Committee is represented on two committees by Allan Dooley, The Texas Company.

5) Committee on Toxicology - American Medical Association
Dr. Osborn has been requested to serve informally as liaison with Torald Sollmann, M. D., Chairman.

6) Interdivisional Committee on Labeling (API)
Representing Medical Advisory Committee
R. D. Bent
C. H. Hine, M. D.
M. N. Newquist, M. D.

7) Liaison on First Aid Training
T. M. Frank, M. D.

Also for your information and files we enclose:

1) 1956 Roster of Medical and Health Committee of the API Board of Directors.

2) 1956 MAC Mailing List for Mimeographed Communications and Circulars.

Please let me have any corrections, additions or deletions which should be made to these lists.

Very truly yours,

DVS:ed
Enclosures

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- E. K. Linder, M. D.
- R. C. Mithoff
- A. C. Pabst

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- George Wilkening

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Representing Medical Advisory Committee
E. K. Linder, M. D.
Leo J. Wade, M. D.

2) Liaison with medical committee of The Asphalt Institute (cancer study)
Medical Advisory Committee liaison
R. E. Eckardt, M. D.

3) Liaison with Smoke and Fumes Committee
API Division of Refining
Medical Advisory Committee liaison through
Chairman, Subcommittee on Atmospheric Pollutants

4) American Standards Association
Medical Advisory Committee is represented on
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ASA Z37 Allan Dooley
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5) Committee on Toxicology - American Medical Association. Dr. Osborn has been requested to serve informall as liaison with Torald Sollmann, M. D., Chairman.

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A. E. Dooley
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		C. R. McKay, Attn: C. T. Brown Richfield Oil Corporation P. O. Box 787 Wilmington, California	(1)
		W. A. Miller Richfield Oil Corporation 555 South Flower Street Los Angeles 17, California	(1)
		Stender Sweeney Richfield Oil Corporation 555 South Flower Street Los Angeles 17, California	(1)
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		A. C. Pabst Socony Mobil Oil Co., Inc. 150 East 42nd Street New York 17, New York	(1)
		C. L. Samuelson, M. D. Socony Mobil Laboratories Paulsboro, New Jersey	(1)
Ralph Schneider, M. D. Standard Oil Company (New Jersey) 30 Rockefeller Plaza New York 20, New York	(1)		
W. Wayne Stewart, M. D. Sun Oil Company 1608 Walnut Street Philadelphia 3, Pennsylvania	(1)	W. E. Barcus Sun Oil Company Research & Development Department 1608 Walnut Street Philadelphia 3, Pennsylvania	(1)

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		Neill Weaver, M. D. Esso Standard Oil Company P. O. Box 551 Baton Rouge 1, Louisiana	(1)
		George Wilkening Esso Standard Oil Company Bayway Refinery Linden, New Jersey	(1)

---oooOooo---

Dr. Philip Drinker
Harvard University
25 Shattuck Street
Boston 15, Massachusetts

Dr. A. W. Horton
The Kettering Laboratory
College of Medicine - Eden Avenue
Cincinnati 19, Ohio

Mr. K. G. Mackenzie
Old Hill Farms Road
Westport, Connecticut

Dr. M. M. Marisic
Pure Oil Company
Research & Development Dept.
Crystal Lake, Illinois

Dr. J. J. Phair
The Kettering Laboratory
College of Medicine - Eden Avenue
Cincinnati 19, Ohio

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AMERICAN PETROLEUM INSTITUTE
50 WEST 50TH STREET
NEW YORK 20, N. Y.

OFFICE OF THE PRESIDENT

March 7, 1957

To Members
Medical Advisory Committee and
Technical Advisors

Gentlemen:

Please substitute the enclosed roster of MAC Sub-committees as corrected 3/7/57 for the previous roster dated 2/12/57.

Very truly yours,

W. Stroop

DVS:js
Enclosure

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015804

ESSO RESEARCH AND ENGINEERING COMPANY

(FORMERLY STANDARD OIL DEVELOPMENT COMPANY)

P.O. Box 45, LINDEN, N.J.

MEDICAL RESEARCH DIVISION

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DIRECTOR

B. E. BENNINSON, M.D.
ASSISTANT DIRECTOR

N. V. HENDRICKS, CH.E.
SR. ENG. ASSOC.

H. W. GERARDE, PH.D., M.D.
RES. ASSOC.

TELEPHONE: WABASH 5-1600

October 26, 1959

Miss Brenda Kirkham
University of Cincinnati
The Kettering Laboratory
College of Medicine
Eden Avenue
Cincinnati 19, Ohio

Dear Miss Kirkham:

In accordance with your letter of October 21, 1959, we have mailed the Final Report of A.P.I. Research Project MC-1 to Drs. Call, Miller and Mitchell.

Enclosed, as you requested, is copy of the members (with addresses) of the Medical Advisory Committee.

Very truly yours,

R. E. Eckardt

R. E. ECKARDT, M.D.

/ch

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meeting

CONFIDENTIAL

MINUTES

SUBCOMMITTEE ON CARCINOGENICITY

November 11, 1948

A semi-annual meeting of the Subcommitee on Carcinogenicity was convened at 11:00 A.M. Thursday, November 11, 1948, in Private Dining Room #1 of the Stevens Hotel, Chicago.

MEMBERS PRESENT

L.E. Curtis
T.M. Frank
A.E. Hoag
J.P. Holt
W.R. Levis
M.N. Newquist
C.A. Swan
McIver Woody
L.C. Beard, Jr.
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W.W. Brooks
F.F. Boys
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B.B. Reeves
E.W. Adams
R.C. Cole
N.J. Gothard

GUESTS

Dr. Robert A. Kehoe - University of Cincinnati
Dr. Francis F. Heyroth - " " "
Dr. A. Wesley Horton - " " "
Dr. W.D. Seyfried - Humble Oil & Refining Company
Dr. S.S. Shaffer - " " " " "
Dr. H.W. Stevenson - Shell Petroleum Company, Ltd., London
Dr. W.J. Sweeney - Standard Oil Development Company

Total in Attendance - 28

MEMBERS ABSENT

T.J. Kelly
R.S. Bonsib
A.J. Koewing, Jr.
H.P. Lankelma

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The new members and guests, L.F. Curtis, C.A. Swan, R.A. Kehoe, Francis F. Heyroth, A.W. Horton, W.D. Seyfried, S.S. Shaffer, H.W. Stevenson, W.J. Sweeney were introduced.

Dr. Kehoe reported on the status of the experimental studies at the Kettering Laboratory and pointed out the desirability of:

1 - Facilities adequate to select materials needed to be tested.

2 - Means whereby samples could be studied as to their relative potencies.

3 - Systematic data on the incidence of malignancy in petroleum workers exposed to these materials.

As to the progress of the building program at Cincinnati, he said that the new wing originally scheduled for completion in May 1948 would surely be ready for occupancy by March 1949 and would include a special animal house on the roof, which has been designed for mice and other small animals which are used in cancer studies. He reminded us that this additional space and the equipment to be installed therein was made possible by the recent A.P.I. grant for capital expense and he assured us that this space, or its equivalent elsewhere in the building, would be reserved for our work.

Dr. A. Wesley Horton, who has just been appointed as Assistant Professor of Industrial Hygiene, was introduced by Dr. Heyroth, who explained that his entire time would be devoted to our problem. In making this appointment, they have selected an organic chemist with practical experience in polycyclic compounds, a knowledge of physical chemistry and an understanding of our industrial problems and technical processes.

Dr. Kehoe said that their new Professor of Preventive Medicine, who is one of the three outstanding epidemiologists in the country, will be able to devote half his time to the A.P.I. project during the coming year.

Dr. Heyroth then reported on the results of tests of the eight A.P.I. samples. His report and charts will be reproduced and distributed to members of the Committee.

Dr. Holt recommended that a wider range of samples be studied, especially those in the higher boiling ranges (above 700° F) and that waxes be investigated also. He cited an article in the N.Y. Times of November 7, 1948 and said that Standard Oil (N.J.) will cooperate fully with the U.S. Public Health Service in its activities in this field. Jersey has found that, if the heavy oil is diluted with 71% white mineral oil, the activity is reduced to about one-fourth its original potency.

Dr. Newquist referred to recent statements in the literature which say that any skin tumor should be considered as potentially malignant.

Dr. Frank thought it would be desirable to study the effects of these oils following repeated applications and washings, thus simulating the actual exposure of employees.

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Dr. Hoag read a report prepared by the Metropolitan Life Insurance Company on "Statistics on Cancer Among Workers in the Oil Industry". He also suggested that some ways be found to challenge incorrect newspaper articles; for example, a recent statement referring to paraffin wax as being carcinogenic.

Dr. Beard read a letter from Col. Auld of the Institute of Petroleum (England) and suggested that Col. Auld be invited to attend a future meeting of the Medical Advisory Committee and describe the work being done in England.

Dr. Stevenson explained that any information given Col. Auld on the problem in the United States would be considered confidential; that the Institute of Petroleum was similar to the A.P.I.

Mr. Warrick stressed the desirability of finding out more about the formation of carcinogens and urged that the technical advisers meet soon with Dr. Horton to discuss these matters.

Mr. Zuidema asked that a comparison between catalytic cracked and thermal cracked material be made.

Dr. Kehoe and Dr. Heyroth, in discussing future work, advocated:

1 - Careful consideration in selecting samples for future testing, taking into account the source, the nature of the crude, the temperature conditions, etc. This should be considered by Dr. Horton and the technical advisers.

2 - The collection of epidemiological data by an expert in that field. While laboratory methods can determine the relative carcinogenicity of various materials, the final answer will depend on human experience.

3 - Study of the reproducibility of results and the effects of dilution.

The following report to the Medical Advisory Committee was approved:

On behalf of the Subcommittee on Carcinogenicity, I present to the Medical Advisory Committee for transmittal to the Safety Committee of the Board of Directors and for adoption by the Executive Committee of the Board of Directors, the following report and recommendations:

1 - That the selection of Dr. A. Wesley Horton for Dr. Kehoe's staff is acceptable to us.

2 - That the selection of the epidemiologist for Dr. Kehoe's staff is acceptable to us.

3 - That an additional $25,000. will be necessary to continue the program at the University of Cincinnati during 1949 to be followed by another $25,000. for the first six months of 1950.

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4 - That the fundamental chemical and physical studies that are indicated to investigate the operational technical aspects of this problem may require considerably more money than anticipated; and it is recommended that the technical advisers group consider the problem again and present their recommendations to the Subcommittee on Carcinogenicity.

5 - That the carcinogenic program which the American Petroleum Institute is sponsoring at the University of Cincinnati should include:

(a) Biological testing program to determine the carcinogenicity of various samples.

(b) Biological or other experimental studies for the purpose of developing quicker techniques for determining the carcinogenicity of these materials.

(c) Experimentation directed toward defining protective procedures that might be used to protect individuals who may come in contact with these oils.

(d) Epidemiological studies of this problem in the industry.

(e) (Deleted by the Medical Advisory Committee).

(f) Investigation of solid and semi-solid natural petroleum constituents such as red wax.

McIVER WOODY, M.D.
CHAIRMAN

A.E. Dooley
SECRETARY

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