PLAINTIFF'S EXHIBIT CEL-980

BEFORE THE NORTH CAROLINA INDUSTRIAL COMMISSION
I.C. NO. 849624

JOHN ALLEN KENNEDY, *et al.*,

Employee-Plaintiffs,

vs.

HOECHST CELANESE,

Employer-Defendant.

DEFENDANT'S RESPONSE TO THE OCTOBER 16, 1998 ORDER OF THE INDUSTRIAL COMMISSION COMPELLING FURTHER RESPONSES TO DISCOVERY

DEFENDANT, in further response to Plaintiffs' interrogatories and requests for production of documents and in response to the Order of the Industrial Commission compelling response to certain interrogatories and requests for production filed October 14, 1998, says:

1. Identify each of the following employees of defendant-employer since 1965:

(a) Industrial hygienists

(b) Safety directors

(c) Supervisors of asbestos abatement activity.

RESPONSE: See attached. Upon information and belief, there has not been anyone designated as a "supervisor of asbestos abatement activity." See responses to previous interrogatories and requests for production of documents.

2. Identify any and all persons involved in the development, creation or writing material cost estimates for the purchase of asbestos or asbestos insulation materials at the Salisbury plant.

RESPONSE: Upon information and belief, there has never been anyone identified to, or responsible for, the Salisbury facility specifically designated, as part of their job responsibilities, to develop, create or write cost estimates for the purchase of asbestos or asbestos insulation materials at the Salisbury plant. Upon information and belief, contained within the engineering job files, there may be documents related to cost estimates for particular work activities, which cost estimates might incidentally relate to asbestos insulation materials.

3. Identify person(s) who created, developed or wrote material cost estimates for the repair of pipes, boilers or other structures in the plant which originally (in 1965) contained or utilized in its structure asbestos-containing material.

RESPONSE: Upon information and belief, asbestos abatement documents previously provided to Plaintiff counsel might in some circumstances contain materials related to the cost of abatement of asbestos performed incidental to the repair of pipes, boilers, or other structures in the plant. Upon information and belief, engineering job files might contain incidental references to material cost estimates for repair of pipes, boilers, or other structures which utilized, when installed, asbestos-containing material. Except to the extent these same documents identify the person preparing the document, Defendant is not aware of any person designated, as part of their job responsibilities, to create, develop, or write material cost estimates for repair of pipes, boilers, or other structures which might utilize asbestos-containing material in its original installation.

4. Provide a list of the types and brands of insulation materials utilized in the original construction of the Salisbury plant.

RESPONSE: See responses to previous interrogatories and requests for production of documents. Upon information and belief, there are not now available any document or documents which list or identify the types of brands of insulation materials used in the original construction of the Salisbury plant.

5. Provide a list of insulation materials utilized in the Salisbury plant which were for insulation purposes subsequent to its original installation.

RESPONSE: See responses to previous interrogatories and requests for production of documents. Contained within the previous documents are references to insulation specifications. Contained within those specifications are references to various types of insulation used at the plant since its construction. Upon information and belief, there has not been located any document directed specifically to listing or identifying insulation materials, by name, utilized at the plants since construction, aside from the specification documents referred to.

This the 8 day of January, 1999.

HATCHER KINCHELOE
Attorney for Defendant

OF COUNSEL:
HEDRICK, EATMAN, GARDNER &
KINCHELOE, L.L.P.
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(704) 366-1101

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon all counsel of Record by depositing a copy of the same in an official depository of the United States mail in a postage-paid envelope addressed to:

Mona Lisa Wallace
WALLACE AND GRAHAM, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Attorney for Plaintiffs.

This the 8 day of January, 1999.

HATCHER KINCHELOE

CORPORATE MEDICAL DIRECTORS

a. Ernest M. Dixon, M.D.
6305 Evermay Drive
McLean, Virginia 22101
1965 - 1982

b. John D. Dougherty, M.D.
51 Highland Avenue
Lisbon, New Hampshire 03585
1982 - 1988

c. Daniel Thomas, M.D.
Hoechst Marion Roussel
Route 202-206
Bridgewater, New Jersey 08807
1988 - 1997

CORPORATE SAFETY DIRECTORS

a. Glenn Fleming
1. Corporate Safety Director
Deceased
1948 - 1970

b. Herbert J. Kolodner, Ph.D.
1. Corporate Safety Director
29370 Stampede Way
Canyon Lake, California 92587
1970 - 1984

c. James M. Ramey
1. Director of Health and Safety/Director of Safety, Health and Environmental Audit Programs
Post Office Box 8634
Horseshoe Bay, Texas 78657
1984 - 1988

d. David B. Johnson
1. Director of Safety, Health and Environmental Policy/Director of Occupational Safety, Health and Industrial Hygiene, and Director of Safety
25 Waldron Avenue
Summit, New Jersey 07901
1989 - 1996

CORPORATE INDUSTRIAL HYGIENISTS

a. Charles S. Laubly
   1. Corporate Industrial Hygienist
      2225 North Tucson Boulevard
      Tucson, Arizona 85716
      1966 - 1979

b. Lawrence R. Birkner
   1. Corporate Industrial Hygienist
      2026 El Monte Drive
      Thousand Oaks, California 91362
      1977 - 1981

c. Lillian Piantanida
   1. Corporate Industrial Hygienist
      Address currently unknown
      1980 - 1981

d. Joseph F. Stelluto
   1. Manager, Industrial Hygiene/Director Safety, Health and Environmental Audit Programs
      696 Wetherby Lane
      Devon, Pennsylvania 19333
      1981 - 1989

e. C. David Barrett
   1. Director of Environmental Affairs
      14 Strawberry Ridge Road
      Ridgefield, Connecticut 06877
      1983 - 1987

f. Grover Vos
   1. Manager, Safety, Health and Environmental Audit Programs
      185 Beaumont Road
      Devon, Pennsylvania 19333,
      1984 - 1989

g. Frederick F. Toca
   1. Director of Occupational Health
      183 Wilshire Drive
      Belle Mead, New Jersey 08502
      1991 - 1997