

Adams, et al. v. Kentucky Power Co., et al.

C.A. No. 85-CI-1724

PRETRIAL WITNESS STATEMENT

Jordan N. Fink, M.D.
Medical College of Wisconsin
Milwaukee, Wisconsin
Tel: (414)-257-6095

SUMMARY OF TESTIMONY

Dr. Fink is an internist and immunologist. He is Chief of the Allergy and Immunology Division of the Medical College of Wisconsin. He will testify on the basis of his education, training, experience, independent scientific research, understanding of the medical and scientific literature, examinations of the plaintiffs, review of the plaintiffs' medical data, and review of the discovery materials generated in this litigation.

Dr. Fink's opinions on these eight plaintiffs have been summarized in reports previously produced to plaintiffs' counsel. As noted in those reports, Dr. Fink will testify as to the results of medical examinations conducted under his supervision at the Lexington Clinic in Lexington, Kentucky. He will testify as to the absence of any demonstrable adverse health effects attributable to the exposures alleged by the plaintiffs, including, but not limited to, the absence of any adverse effects on plaintiffs' immune systems allegedly attributable to the claimed exposures.

Adams, et al. v. Kentucky Power Co., et al.

C.A. No. 85-CI-1724

PRETRIAL WITNESS STATEMENT

S. Alf Fischbein, M.D.
Mt. Sinai School of Medicine
New York, New York
Tel: (212) 241-6173

SUMMARY OF TESTIMONY

Dr. Fischbein is Assistant Professor, Environmental Sciences Laboratory, Department of Community Medicine, and Associate Professor, Division of Environmental and Occupational Medicine, Department of Community Medicine, Mt. Sinai School of Medicine of the City University of New York. Dr. Fischbein has published extensively in the area of human health effects associated with occupational exposure to PCBs. He will testify on the basis of his education, training, experience, independent scientific and medical research, understanding of the medical and scientific literature, his review of the medical data obtained on the plaintiffs, his review of the discovery materials generated in this litigation and his studies of workers exposed to PCBs, including studies of General Electric capacitor workers.

Dr. Fischbein is presented as a rebuttal witness to plaintiffs' expert testimony alleging pulmonary (lung) injury as a result of the claimed exposure. Based upon his review of the plaintiffs' chest X-rays, pulmonary function tests and other medical data, Dr. Fischbein will testify as to the pulmonary status of each plaintiff and will testify that the alleged

exposures to PCBs did not cause any pulmonary dysfunction or injury in these plaintiffs. Dr. Fischbein will also testify about the results of studies he has performed on workers occupationally exposed to PCBs and will testify that exposure to PCBs has not been causally linked to pulmonary dysfunction.