

JAN.08.96* 11238



IN RE

§ IN THE DISTRICT COURTS OF

ASBESTOS LITIGATION

§ HARRIS COUNTY, TEXAS

**KELLY MOORE PAINT COMPANY, INC.'S
ANSWERS TO INTERROGATORIES AND RESPONSES
TO REQUESTS FOR PRODUCTION
PROPOUNDED BY PLAINTIFFS**

Comes Now, KELLY MOORE PAINT COMPANY, INC., a defendant in the above-entitled and numbered cause, and pursuant to the Texas Rules of Civil Procedure, submits and files its answers to interrogatories and responses to request for production propounded by plaintiffs herein, showing unto the court the following.

Respectfully submitted,

ORGAIN, BELL & TUCKER, L.L.P.
470 Orleans Street
Beaumont, Texas 77701
409-838-6412
FAX: 409-838-6959

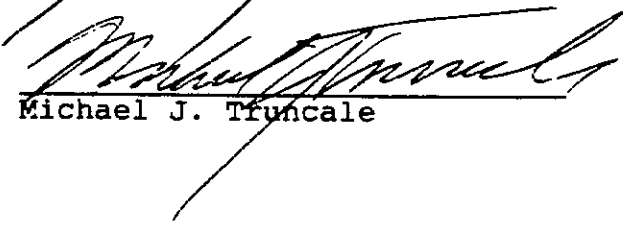
BY: 

Michael J. Truncale
State Bar No. 20258125

ATTORNEYS FOR DEFENDANT,
KELLY MOORE PAINT COMPANY, INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all interested counsel of record on this the 5TH day of January, 1996.


Michael J. Truncale

**RESPONSES TO INTERROGATORIES
AND REQUEST FOR PRODUCTION**

1. Identify the registered name of answering Defendant, as well as all prior names or predecessor entities by which Defendant has existed.

ANSWER: Kelly-Moore Paint Company, Inc.

2. Identify all past and present divisions, subsidiaries or affiliated companies of the answering Defendant, having any function which now or in the past engaged in any phase of mining, manufacturing, sale, supply, purchase, application, installation, relabelling, processing or distribution of asbestos or asbestos-containing products. With respect to each of such divisions, subsidiaries or companies, set forth with particularity the precise relationship with the answering Defendant, the dates, thereof, and identify the nature and extent of such functions during the relevant periods of time in which such activities have or had occurred.

ANSWER: Paco Textures Division; subsidiary purchased December 1960; manufactured, distributed and sold the products listed in Exhibit "A".

3. List by brand name all of your asbestos-containing products. Your asbestos-containing products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, mined, milled, relabelled, resold, processed, applied or installed by you or for you by others. By you and yours, Plaintiffs refer to Defendant, to all your predecessors in interest, (whether by purchase, merger, consolidation or otherwise), to all of your subsidiaries, divisions, joint ventures or affiliates. As to each product, state the following:

ANSWER: See Exhibit "A".

- a. Type of product (e.g. acoustical plaster, fire-proofing, etc.);

ANSWER: See Exhibit "A".

- b. The date the product first went into production;

ANSWER: See Exhibit "A".

- c. The last date the product was produced;

ANSWER: See Exhibit "A".

d. The last date the product was sold;

ANSWER: See Exhibit "A".

e. All manufacturing locations;

ANSWER:

1. Kelly-Moore Paint Company, Inc., 987 Commercial Street, San Carlos, California 94070;
2. Kelly-Moore Paint Company, Inc., 301 West Hurst Blvd., Hurst, Texas 75053;
3. Kelly-Moore Paint Company, Inc., 3600 East 45th Avenue, Denver, Colorado 80216;
4. Kelly-Moore Paint Company, Inc., 11200 Kirkland Way, Washington 98033;
5. Kelly-Moore Paint Company, Inc., West Kenosha Street, Broken Arrow, Oklahoma 74012;
6. Kelly-Moore Paint Company, Inc., The Alameda, Houston, Texas;
7. Kelly-Moore Paint Company, Inc., 1400 Campus Drive, Ontario, California 91764.

f. Dates of manufacture at each location;

ANSWER:

1. December 1960 to March 1978;
2. As far as defendant is aware, 1970 to 1977;
3. As far as defendant is aware, 1971 to 1976;
4. As far as defendant is aware, 1969 to 1972;
5. As far as defendant is aware, 1969 to 1977;
6. As far as defendant is aware, 1967 to 1974;
7. As far as defendant is aware, 1968 to an unknown date, but it is not operating at present.

g. The percentage of asbestos (state if percentage is by volume or weight) and the dates and all reasons for any modification thereof;

ANSWER: See Exhibit "A".

h. The type of asbestos;

ANSWER: See Exhibit "A".

- i. The specific source of asbestos with dates;

ANSWER: See Exhibit "A".

- j. The color, physical characteristic and appearance of the product;

ANSWER: See Exhibit "A".

- k. A full and precise description of the package in which the product was sold, including, but not limited to, type of package, size, color(s) and writings thereon;

ANSWER: See Exhibit "A". In addition, a picture or sample of most asbestos-containing products has been retained by Kelly-Moore Paint Company, Inc., at 987 Commercial Street, San Carlos, California, and has been furnished previously to the law firm of Baron & Budd. They are available for review at the site where they are stored upon reasonable request. The documents will be produced as they have been stored. The markings differ for each product.

- l. All other names under which the product was sold;

ANSWER: See Exhibit "A".

- m. The number and dates of each patent or patent application as to the product;

ANSWER: Not applicable.

- n. If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos and the date the product was first produced without the asbestos;

ANSWER: See Exhibit "A". The asbestos was removed in accordance with applicable law.

- o. If the product is no longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the brand name of the replacement product and the date the replacement product first went into production;

ANSWER: Objection; this defendant objects to this interrogatory as over broad, vague, ambiguous and irrelevant. All of this defendant's products are not at issue in this litigation, only those which contained asbestos.

This Defendant further objects to this interrogatory as irrelevant as the materials at issue in this litigation are asbestos-containing products. As this interrogatory inquires only as to non-asbestos-containing products, it requests information irrelevant to this litigation.

Subject to this objection and without waiving the same, Kelly Moore stopped producing the product in accordance with applicable law. See also the testimony of Mr. Doug Merrill taken by Mr. Al Stewart of the Baron and Budd law firm.

- p. A precise description of your identifying logo or initials and the dates of inclusion on the product;

ANSWER: This Defendant herein incorporates its response to Interrogatory No. 3(k).

- q. State during what period of time such product has been associated with Defendant;

ANSWER: See Exhibit "A".

- r. Identify all sales literature, including brochures, advertisements, pamphlets or other material describing such product, its uses and methods of application or installation:

ANSWER: Such documents are located at 987 Commercial Street, San Carlos, California. They are available for review at the site where they are stored upon reasonable request. The documents will be produced as they have been stored.

- s. Identify any warning labels, inserts or other writings provided with such product and with every such printed warning, state what period of time it has or had accompanied the product, the exact wording or the warning, any amendments made to the wording, where the warning was located on each product or packaging and on what asbestos products the warning appeared;

ANSWER: Warnings on exterior packaging were printed to read:

CAUTION - READ BEFORE USING
CONTAINS ASBESTOS FIBERS
AVOID BREATHING DUST
BREATHING ASBESTOS DUST MAY CAUSE BODILY HARM

This warning was used from November 1972 until asbestos was removed from the products.

t. Geographic distribution range of each such product.

ANSWER: See Exhibit "B". See also the deposition testimony of Mr. Doug Merrill taken by Mr. Al Stewart of the Baron & Budd law firm.

4. Did you claim your asbestos product(s) to be safe, effective and/or easy to handle? If so, identify all documents which have made such assertions, including, but not limited to, brochures or advertisements (radio, television or printed) and revisions, thereof, by publication(s) and date. Your asbestos products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, mined, milled, relabelled, resold, processed, applied or installed by you or for you by others.

ANSWER: At various times from 1960 through 1978, this defendant has asserted that one or more of its products were effective and/or easy to handle. Such documents are located at 987 Commercial Street, San Carlos, California. They are available for review at the site where they are stored upon reasonable request. The documents will be produced as they have been stored.

5. Did you specifically inform the purchaser or user of your products at the time your product was sold, installed, used, supplied or, subsequently, that your products could cause lung cancer, asbestosis, and mesothelioma? If so, identify the document containing such information by date and location.

ANSWER: Objection; this defendant objects to this interrogatory as overly broad, argumentative, without foundation, and assumes facts not in evidence. All of this defendant's products are not at issue in this litigation, only those which contained asbestos.

This defendant further objects to this interrogatory as irrelevant. Subject to these objections and without waiving the same, defendant makes reference to the response to Interrogatory #3s.

6. Identify any and all labeling or relabelling agreements between answering Defendant and other entities, including other Defendants concerning asbestos containing products and materials.

ANSWER: Not applicable.

7. Have you ever mined asbestos? If so, as to each mine and type of asbestos produced there, state the following:

ANSWER: No.

a. The location;

ANSWER: Not applicable.

b. The dates of operation by you;

ANSWER: Not applicable.

c. The type (e.g. chrysotile, amosite, etc.) produced;

ANSWER: Not applicable.

d. The grade of each type of asbestos fiber produced, the percentage of each grade to the total fiber produced by year or other period and the recommended use of the grade of fiber;

ANSWER: Not applicable.

e. The gross annual sales in dollars and in volume of each type of grade of asbestos fiber;

ANSWER: Not applicable.

f. A full and precise description of the package in which the asbestos fiber was sold, manufactured, but not limited to, type of package, size, color(s) and writing thereon;

ANSWER: Not applicable.

g. All names under which the asbestos fiber was sold;

ANSWER: Not applicable.

h. The identity of all records reflecting the sale or transfer of said asbestos fiber;

ANSWER: Not applicable.

- i. The identity of the present custodian of photographs of burlap bags in which the asbestos fibers was stored and/or shipped;

ANSWER: Not applicable.

- j. The address of each sales office and sales region for the sale of the asbestos fiber:

ANSWER: Not applicable.

- k. The name of each authorized distributor of the asbestos fiber produced;

ANSWER: Not applicable.

- l. The identity of each owner and operator of the mine prior to the date you first began operation of the mine and the dates thereof; and

ANSWER: Not applicable.

- m. The identity of each owner and operator of the mine subsequent to your ceasing operation of the mine.

ANSWER: Not applicable.

8. Is answering Defendant aware of the possible connection between exposure to asbestos or asbestos products and:

- a. Asbestosis?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgment and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of asbestosis.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

- b. Lung cancer, all cell types?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of lung cancer.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

c. Mesothelioma?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of mesothelioma.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

d. Colon cancer?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of colon cancer.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

e. Stomach cancer?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of stomach cancer.

Without waiving the above stated objection, this Defendant responds as follows: This Defendant has no independent knowledge of this disease process.

f. Laryngeal cancer?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of laryngeal cancer.

Without waiving the above stated objection, this Defendant responds as follows: This Defendant has no independent knowledge of this disease process.

g. Cancer of the Kidney?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of cancer of the kidney.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

h. Cancer of the Esophagus?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of cancer of the esophagus.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

I. Other gastro-intestinal cancers?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that all levels of asbestos exposure can result in the development of gastro-intestinal cancers.

Without waiving the above stated objection, this Defendant responses as follows: This Defendant has no independent knowledge of this disease process.

j. Pneumoconiosis?

ANSWER: Objection; this interrogatory is overly broad, vague, ambiguous, burdensome, harassing, irrelevant to this litigation, and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Defendant would defer to the judgement and opinions of its medical expert witnesses on such questions of human diseases, their causes, and diagnoses. Finally, the Interrogatory is argumentative and without foundation to the extent it implies that

all levels of asbestos exposure can result in the development of pneumoconiosis.

Without waiving the above stated objection, this Defendant responds as follows: This Defendant has no independent knowledge of this disease process.

9. If your answer to the above interrogatory, as to any or all of its sub-parts, is affirmative, identify:

- a. When and how Defendant first learned of such connections;

ANSWER: Not applicable.

- b. If knowledge was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting and provide the identity of person attending or documents obtained;

ANSWER: Not applicable.

- c. If knowledge was obtained from medical or scientific studies, or any other published work, identify same;

ANSWER: Not applicable.

- d. If otherwise obtained, identify manner of receipt of document or communication.

ANSWER: Not applicable.

10. With regard to any knowledge obtained subsequent to that identified in the above interrogatory and up until the time that you ceased to sell and/or manufacture asbestos products, identify:

- a. All documents or other communications, oral or written, concerning the casual connection between exposure to asbestos or asbestos products and disease and identity of persons so communicating;

ANSWER: Not applicable.

- b. Did answering Defendant obtain from or transmit any such information to other Defendants in this case? If so, identify:

ANSWER: Not applicable.

- 1. Manner of receipt or communication for each contract;

ANSWER: Not applicable.

2. All documents and persons involved.

ANSWER: Not applicable.

11. As to any knowledge possessed by answering Defendant at any time referred to in answers to the preceding three interrogatories, did you educate your employees, distributors, or purchasers about the hazards known to you and any safety precautions necessary to guard against cancer and other diseases arising from the use and handling of your asbestos containing products? If so, identify:

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, this defendant hereby incorporates its response to Interrogatories 3(s) and 8a-j.

a. When and in what manner customers, insulators, non-employee factory workers and the general public were so informed;

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, this defendant hereby incorporates its response to Interrogatories 3(s) and 8a-j.

b. Documents communicating or otherwise disseminating such information:

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, this defendant hereby incorporates its response to Interrogatories 3(s) and 8a-j.

c. Programs initiated or sponsored to establish or promote safety procedures, methods or usage of asbestos containing products;

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, this defendant hereby incorporates its response to Interrogatories 3(s) and 8a-j.

- d. Published articles or reports by employees (present or prior), including those of medical directors, scientists, engineers or other professionals;

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, Kelly Moore answers "No".

- e. Symposia or lectures sponsored for the benefit of asbestos workers and/or the general public.

ANSWER: Objection; this defendant objects to this interrogatory because it is overly broad, vague, ambiguous, argumentative, without foundation, and it assumes facts not in evidence; subject to these objection and without waiving the same, Kelly Moore answers "No".

12. When, before 1972, and by what manner were you first aware of the health hazards relating to exposure to asbestos or asbestos products for insulators, plasterers, pipefitters, boilermakers, operators, sheet metal workers, helpers, drywall finishers, mechanics, carpenters, shipfitters, machinists and bystanders exposed to inhalers.

ANSWER: Objection; this defendant objects to this interrogatory on the basis that it is vague, ambiguous, and overly broad, especially in its undefined use of the terms "health hazards", "exposure", "asbestos or asbestos products". Furthermore, the interrogatory is without foundation and assumes facts not in evidence.

13. Did you perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning potential health hazards involved with the use of asbestos containing materials? If so, identify such studies or tests and state:

ANSWER: Objection; this interrogatory is vague and ambiguous in that it is not specific as to time. Also, it invades or has the potential of invading the attorney-client work product privileges; subject to these objections and without waiving the same, Kelly Moore answers: No tests or studies were required or needed.

- a. When, where and at what intervals such studies were performed;

ANSWER: Not applicable.

- b. Were such studies in writing or reported at a later date in writing;

ANSWER: Not applicable.

- c. Were the results of such studies published or otherwise disseminated? If so, state to whom and when:

ANSWER: Not applicable.

- d. What were the results of such studies?

ANSWER: Not applicable.

14. During the time period that you manufactured, sold, supplied, applied, distributed or installed asbestos containing products, what tests have been performed by any governmental agency, body, commission or health organization including, but not limited to, the U.S. Public Health Service, OSHA or NIOSH, in your plants or on job sites owned or controlled by you concerning: specific hazards associated with the use and handling of asbestos and asbestos products; any restrictions in use of same; requirements for medical surveillance and examinations for your workers, dust monitoring or availability of safety equipment? If such findings were made, identify:

ANSWER: None.

- a. The date or dates of such findings and by which organization or entity such findings were made;

ANSWER: Not applicable.

- b. The form in which such findings were made and, if written, the exact wording of same or location in regulation, order, bulletin, report or other writing;

ANSWER: Not applicable.

- c. What steps were taken to comply with such findings and the dates when such acts of compliance occurred;

ANSWER: Not applicable.

- d. How users of or bystanders exposed to asbestos or asbestos containing products were informed of such findings and if such information was written identifying same.

ANSWER: Not applicable.

15. During the time that you manufactured, sold, designed, supplied, distributed, mined, milled, relabelled, resold, processed, applied or installed asbestos containing products, did you perform, direct to be performed, finance, sponsor or receive the results of any dust monitoring tests at job sites where asbestos-containing products were being applied and/or removed? If so, state:

ANSWER: No.

a. The date and location of the first such test;

ANSWER: Not applicable.

b. When, where and at what intervals subsequent tests were performed;

ANSWER: Not applicable.

c. Who performed such tests;

ANSWER: Not applicable.

d. Where the results of such tests are maintained;

ANSWER: Not applicable.

e. What steps were taken by you to improve results of such tests and dates when such improvements were made.

ANSWER: Not applicable.

16. If your answer to the above interrogatory is in the negative, state your reasons for not performing dust monitoring tests.

ANSWER: During the period in which this defendant manufactured, distributed and sold asbestos-containing products, there were no requirements that it conduct any such testing or apparent need. See also this defendant's response to interrogatory no. 18.

17. During the time that Defendant sold, manufactured, designed, supplied, distributed, mined, milled, relabelled, resold, processed, applied or installed asbestos containing products, did the Defendant ever have any inspectors or anyone from your company or hired by your company whose job it was to go to the area where your asbestos containing products were being used, removed or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure and the findings and what action, if any, was taken in response to the findings and attach results.

ANSWER: No.

18. During the time that Defendant manufactured, sold, designed, supplied, distributed, mined, milled, relabelled, resold, processed, applied or installed asbestos containing products, identify any medical examination programs offered or sponsored by answering Defendant or its insurance carrier(s) for employees of its insured handling or otherwise exposed to asbestos and asbestos products. With respect to each program, state:

ANSWER: Yes.

- a. Manner of communication with employees about such program;

ANSWER: Annual exams were scheduled by defendant Kelly Moore. Notice was provided both orally and in writing.

- b. Whether examination was mandatory or optional;

ANSWER: Mandatory from 1972 to 1978, and voluntary from 1978 on.

- c. What percentage of workers permitted to undergo such examination participated;

ANSWER: 100%.

- d. What percentage of workers were found to have asbestosis or mesothelioma:

ANSWER: Zero.

- e. With respect to (d), what percentage of such workers were paid disability or workmen's compensation benefits or for whose benefit medical expenses were paid to undergo treatment for such conditions.

ANSWER: Not Applicable.

19. Does the Defendant have or has it ever had, a Medical Department, and/or a research department and/or an Industrial Hygiene Department? If so, give the date upon which such Medical Department and/or Industrial Hygiene Department was established and whether or not such department has operated continuously since being established.

ANSWER: This defendant has a Research and Development Department, but it has not had a Medical Department or an Industrial Hygiene Department.

- a. Name each director, chief or head of your Medical Department and/or Industrial Hygiene Department year by year with the first year you had a director of such department. Give the last known address of each.

ANSWER: Not applicable.

- b. State in detail the duties, responsibilities and purpose of such department(s).

ANSWER: Not applicable.

20. Identify all asbestos related trade organizations, associations or other entities including, but not limited, to the Gypsum Association, Vermiculite Institute, Asbestos Textile Institute, Industrial Hygiene Foundation, Magnesia Insulation Manufacturers Association, National Insulation Manufacturers Association, Asbestos Information Association, National Insulation Contractors Association, Thermal Insulation Manufacturers Association, Quebec Asbestos Manufacturers Association, Quebec Asbestos Producers Association to which you have belonged or in which you have participated and as to each respective organization, identify the dates of membership or participation.

ANSWER: This defendant is a member of the Coatings Research Group, Inc.

21. Identify any documents, not currently on file in the Master Asbestos File of Harris County, either received by you from those trade organizations, associations or other entities identified in the preceding interrogatory or else submitted by you to those trade associations, organizations or other entities that relate to any relationship between asbestos exposure and disease.

ANSWER: Not applicable.

22. Identify all agreements, oral or written, between you, any of the other Defendants in this lawsuit and/or any other organizations, associations or other entities identified in your answer to Interrogatory No. 20 and/or any medical or scientific foundations, not currently on file in the Master Asbestos File of Harris County, relating to the standardization of:

- a. Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos-containing products during the time that you manufactured, sold, distributed or applied asbestos-containing products.

ANSWER: None.

- b. Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers or boxes during the time that you manufactured, sold, distributed or applied asbestos-containing products.

ANSWER: None.

- c. Methods of dissemination of public relation information to Defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public pertaining to asbestos health hazards.

ANSWER: None.

- d. Safety equipment and/or protective clothing to be utilized while handling Defendant's asbestos products.

ANSWER: None.

- e. Medical programs related to asbestos health hazards to be offered or sponsored by Defendant.

ANSWER: None.

23. Did you direct to be performed, sponsor, finance or receive the results of any studies or tests performed by the Saranac Lake Laboratory to the Trudeau Foundation relating to asbestos exposure and its effects upon human life? If so, identify:

ANSWER: No.

- a. All documents summarizing findings or results of those studies or tests which you have in your possession or control;

ANSWER: Not applicable.

- b. All communications, oral or written, between answering Defendant and Saranac personnel including, but not limited to Gerrit W.H. Schepers, M.D. and George Wilbur Wright, M.D.;

ANSWER: Not applicable.

- c. All documents relating to Saranac studies received or submitted by you whether directly, through associated or predecessor companies, through other companies or through trade associations, organizations or other entities:

ANSWER: Not applicable.

- d. All recommendations or findings of such studies relating to:

1. Adequacy or inadequacy of threshold limit values;

ANSWER: Not applicable.

2. Substitution of materials other than asbestos.

ANSWER: Not applicable.

- e. Where documents and/or communications identified in answers to (a) - (d) of this interrogatory are maintained.

ANSWER: Not applicable.

24. Prior to December 31, 1989, has any employee of answering Defendant ever made a claim for any asbestos related disease under the Occupational Disease or Workmen's Compensation Statute of any state? If so, state:

ANSWER: Yes.

- a. The date that Defendant first received notice of such claim:

ANSWER: March 31, 1983.

- b. The total number of such claims per year received to date;

ANSWER: As far as defendant is aware, only two such claims have been made to date.

- c. The number of such claims for which disability benefits and/or medical expenses were paid by Defendant;

ANSWER: Unknown.

- d. Identify all persons to whom disability benefits and/or medical expenses were paid by Defendant and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

ANSWER: Unknown.

25. Identify each and every magazine or trade publication in which answering Defendant advertised its asbestos products from 1950 until the time you ceased mining, milling, selling, distributing and/or applying asbestos containing products.

ANSWER: Defendant Kelly-Moore is unaware of any such advertisements. This defendant has retained numerous boxes of documents at 987 Commercial Street, San Carlos, California. They are available for review at the site where they are stored upon reasonable request. The documents will be produced as they have been stores.

26. As to the person(s) answering these interrogatories, state:

a. Name;

ANSWER: Douglas Wayne Merrill

b. Title or position with Defendant;

ANSWER: Vice President of Manufacturing

c. Length of time employed by Defendant.

ANSWER: 1968 to present.

27. Have you ever sold raw asbestos fiber? If so, state the dates you were involved in the sale of raw asbestos fiber.

ANSWER: No.

28. State whether or not you have any information as to your relative market share regarding each of your asbestos-containing products. If so, as to each year between 1940 or the time that you began mining, milling, selling, distributing and/or applying asbestos-containing products until cessation of same and with respect to each type of product, provide such information or opinion as to your market share and identify each document which provides any information to assist you in this determination. Give the same answers as to asbestos-containing products in the Texas Gulf Coast area.

ANSWER: Unknown.

29. Have you designated distributors of your asbestos-containing products in the State of Texas? If so, then state the name of all companies, their addresses, give the years that each was a designated distributor and the products each distributed.

ANSWER: No.

30. If you did not have designated distributors in the State of Texas, then state by what method sales of asbestos-containing materials were made. Give the name and addresses of all Defendant's sales offices, relating to asbestos-containing products, located in the State of Texas.

ANSWER: See Exhibit "D".

31. Did you ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER: No.

32. Based upon the contents of your products, the method of manufacturing and the method of application, could or can your products be generally applied or removed without liberating asbestos fibers? Your answer may be limited to those asbestos-containing products that have been identified in any Harris County asbestos case.

ANSWER: Yes.

- a. If there is a different answer concerning different products manufactured, sold, distributed or used by your company then specify the different products by manufacturer's name and popular name.

ANSWER: Not applicable.

- b. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

ANSWER: Not applicable.

- c. If there is a difference in your answer depending on the trade or type worker, then specify which type workers you are referring to.

ANSWER: Not applicable.

33. Was it anticipated that your asbestos-containing products may have to be removed, stripped, disturbed or replaced at any time after installation?

ANSWER: Unknown, it would depend on the end user or owner of the building.

34. Did the Defendant, during the time it mined, manufactured, milled, sold or applied asbestos-containing products, give users or other persons exposed to asbestos-containing products or their employers who would be applying, using, removing your asbestos-containing products instructions concerning safety precautions to use in applying, using or removing such products? If so, describe such instructions, to whom they were given, the dates they were given and the manner of giving such instructions.

ANSWER: Yes, this defendant herein incorporates its response to Interrogatory No. 3(s).

35. If you have pled that the Plaintiff misused Defendant's asbestos-containing products, then state in what manner the Defendant contends that Plaintiff misused it products. If "Yes", then state in what manner and under what circumstances each product was misused. Also state what Plaintiff could have done to avoid such misuse.

ANSWER: Objection; this interrogatory is vague and ambiguous since it does not define the term "misuse" and it does not identify a particular plaintiff.

36. List all the job sites, contractors and/or facilities in the Gulf Coast area of Texas, including, but not limited to, oil refineries, chemical plants, power plants, shipyard, commercial buildings and manufacturing plants, where or to whom Defendant's asbestos products were supplied, distributed, sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution, use or installation and, if known, the physical location within the facility listed. Alternatively, you may produce the documents requested in Request for Production No. 1.

ANSWER: Objection; this defendant objects to this interrogatory as burdensome and oppressive. This interrogatory would necessitate the preparation, compilation and summary of documents in defendant's possession. As such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, this defendant offers to permit review of the documents located at Kelly-Moore Paint Company, Inc., 987 Commercial Street, San Carlos, California, from which the propounding party can inspect, copy and summarize. This defendant will make said documents available for review at the site where they are stored upon reasonable request. The documents will be produced in the manner in which they are stored.

37. For the attached list of San Antonio job sites, state whether or not Defendant's asbestos products were supplied, distributed, sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution, use of installation and, if known, the physical location within the facility listed.

ANSWER: Objection; this interrogatory is vague and ambiguous since no attachment was received by this defendant. Subject to this objection and without waiving the same, this defendant incorporates its response to Interrogatory No. 36.

38. Up until the time that you ceased to sell and/or manufacture asbestos-containing products, had the Defendant ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use of the Defendant's asbestos-containing products? If so, give the following:

ANSWER: No.

a. Name of the person or firm conducting such studies;

ANSWER: Not applicable.

b. The date the studies began and the date completed;

ANSWER: Not applicable.

c. Any publication or dissemination of the results of the studies:

ANSWER: Not applicable.

d. The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;

ANSWER: Not applicable.

e. Attach copies.

ANSWER: Not applicable.

39. Has the Defendant ever directly advised any person or party to whom you sell your asbestos-containing products of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists or mandated by any governmental entity? If so, state the date that you so advised such person or party, the manner in which you advised such person or party and the name of each.

ANSWER: Unknown.

40. State the year that this Defendant was first advised of threshold limit values and maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists and state the name of the employee of the company receiving such information, the information received, the method of receipt of such information and attach copies of the instrument communicating such advice.

ANSWER: Unknown.

41. Was such threshold limit values of maximum allowable concentrations inquired about in the preceding interrogatory total dust or just asbestos dust?

ANSWER: Unknown.

42. Up until the time that Defendant ceased to sell and/or manufacture asbestos-containing products, state in detail what test, if any, your company or its predecessor(s) ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which users or bystanders were exposed while using your asbestos-containing products.

ANSWER: None since no testing was required or needed.

43. Does the Defendant possess or have in its control any written documents and/or written materials prior to 1980 which indicate that other manufacturers of asbestos-containing products had any knowledge, information or understanding that asbestos would, could or might be harmful? If so, list each document and/or written material and attach a copy.

ANSWER: Unknown. This defendant has retained numerous boxes of documents at 987 Commercial Street, San Carlos, California. They are available for review at the site where they are stored upon reasonable request. The documents will be produced as they have been kept stored.

44. Did your company or its predecessor(s) ever place any warning directly on any of its asbestos-containing products? (i.e. on insulation pipe covering itself). If so, state the wording of such warning, the size, how it was marked and the dates of placement.

ANSWER: Placement by defendant of any warnings directly onto any of its asbestos-containing products is clearly impossible due to the physical form of the products. However warnings were placed on the products'

packaging. This defendant herein incorporates its response to Interrogatory No. 3(s).

45. Did the Defendant ever provide a warning within its sales literature pertaining to asbestos-containing products? If so, list the wording, the dates and what literature it was placed in.

ANSWER: This defendant herein incorporates its response to Interrogatory No. 3(s).

46. Were any Material Safety Data sheets ever prepared by the Defendant for your asbestos products? If so, attach copies.

ANSWER: No.

47. Does Defendant have insurance policies that might cover the claims made by Plaintiff in this case?

ANSWER: Yes.

48. If the answer to the above interrogatory is affirmative, please state:

- a. The amounts of insurance coverage that is currently available as of the date you answer these interrogatories, and

ANSWER: Unknown as litigation is ongoing in three states.

- b. How much is in dispute.

ANSWER: Unknown as litigation is ongoing in three states.

49. If you have not previously supplied the requested information in the Master Asbestos File, then for each and every expert witness, medical or otherwise, whom you may call to testify during the trial of this cause, please state the following:

- a. Full name;

ANSWER: See Exhibit "C".

- b. Address;

ANSWER: See Exhibit "C".

- c. Phone number;

ANSWER: See Exhibit "C".

- d. Each subject matter on which the expert witness is expected to testify;

ANSWER: See Exhibit "C".

- e. The mental impressions and opinions held by the expert which relate to this cause in any way, and

ANSWER: Objection; this defendant objects to this interrogatory as it requests information protected by the attorney work-product privilege. This defendant has not decided which of those experts listed in Exhibit "C" it will call as a witness in any particular action. Any experts utilized by defendant to date are for the purposes of consultation and case preparation. This question seeks to ascertain information and other data which consultant expert witnesses have provided this defendant in preparation of its defense in this litigation and, as such, violates the attorney work-product privilege. Subject to this objection and without waiving the same, defendant would refer the plaintiffs to numerous designations of expert witnesses filed in Master Asbestos files in Dallas and other counties.

- f. The facts known to the expert (regardless of when the factual information was acquired) which relate to or form the basis of the mental impression and opinions held by the expert.

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome and harassing in that it is impossible to a party to state all facts known by an expert. This defendant herein incorporates its response to 49(e).

- g. Who will be paying each such expert and how much.

ANSWER: This defendant herein incorporates its response to 49(e).

50. If you have not previously supplied the requested information in the Master Asbestos File, then for each expert who will not be called as a witness but whose work product forms the basis in whole or in part of the opinions of an expert who will be called as a witness, state:

- a. The name, address and telephone number of the non-testifying expert;

ANSWER: Objection; this defendant herein incorporates its response to 49(e).

This defendant further objects to this interrogatory as premature. This defendant has not yet identified which experts it expects to call as a witness in any particular asbestos-related action.

- b. The subject matter of the work product on which the testifying expert will relay;

ANSWER: Objection; this defendant herein incorporates its response to 49(e).

This defendant further objects to this interrogatory as premature. This defendant has not yet identified which experts it expects to call as a witness in any particular asbestos-related action.

- c. The mental impression of the non-testifying expert, and

ANSWER: Objection; this defendant herein incorporates its response to 49(e).

This defendant further objects to this interrogatory as premature. This defendant has not yet identified which experts it expects to call as a witness in any particular asbestos-related action.

- d. The facts known to the non-testifying expert.

ANSWER: Objection: This defendant herein incorporates its response to 49(e).

This defendant further objects to this interrogatory as premature. This defendant has not yet identified which experts it expects to call as a witness in any particular asbestos-related action.

51. Identify the name, address and telephone number for every person whom you intend to call as a witness at trial who has not previously been listed as a witness in Defendant's Master Witness List on file in the Master Asbestos File.

ANSWER: Objection; this defendant objects to this interrogatory as premature and a violation of the attorney-client and work product privilege. This defendant has not yet identified which experts or lay witnesses it expects to call as a witness in any particular asbestos-related action.

52. What is Defendant's present net worth?

ANSWER: Objection; this defendant objects to this interrogatory as irrelevant. The question calls for information not

relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Also, the interrogatory violates the principles set forth in Able Supply Company v. Moye, 898 S.W.2d 766 (Tex. 1995), especially insofar as the plaintiffs have failed to make a prima facia showing that they are entitled to punitive damages. Also, the interrogatory is vague and ambiguous in that it does not define net worth.

53. Has this Defendant or its present directors or officers acting on its behalf, made monetary contributions in excess of \$5,000.00 within the past ten years to the following scientists or researchers who have written on the subject of asbestos-related diseases or to the employing universities on behalf of or at the request of the scientist or researcher:

Raymond Murphy - Harvard Medical School and Harvard School of Public Health

ANSWER: No donations are known of at this time.

Margaret Becklake - McGill University, Montreal, Canada

ANSWER: No donations are known of at this time.

Stuart Brooks - University of Florida at Tampa

ANSWER: No donations are known of at this time.

Edward A. Gaensler - Boston University of Medicine, Harvard Medical School, Tufts Medical School

ANSWER: No donations are known of at this time.

Bernard Gee - Yale University School of Medicine

ANSWER: No donations are known of at this time.

Allan Goldman - South Florida College of Medicine, Division of Pulmonary, Critical Care and Occupational Medicine

ANSWER: No donations are known of at this time.

Jerome Kleinerma - Case Western Reserve University School of Medicine

ANSWER: No donations are known of at this time.

Hilton Lewinsohn - University of Connecticut, Yale University

ANSWER: No donations are known of at this time.

Hans Weill - Tulane University

ANSWER: No donations are known of at this time.

Morton Corn - John Hopkins

ANSWER: No donations are known of at this time.

Brooke Mossman - University of Vermont

ANSWER: No donations are known of at this time.

John Craighead - University of Vermont

ANSWER: No donations are known of at this time.

J. Christopher Wagner

ANSWER: No donations are known of at this time.

J. Corbett McDonald - McGill University

ANSWER: No donations are known of at this time.

Peter Elmes

ANSWER: No donations are known of at this time.

Paul E. Wheeler - John Hopkins

ANSWER: No donations are known of at this time.

Lee Reichman - University of Medical and Dentistry of New Jersey,
Newark, New Jersey

ANSWER: No donations are known of at this time.

J.M.G. Davis - Institute of Occupational Medicine, Edinburgh,
U.K. (England)

ANSWER: No donations are known of at this time.

J.N.P. Davis - Albany Medical College, New York

ANSWER: No donations are known of at this time.

54. In what year did this Defendant first become aware of the 1938 Public Health Bulletin No. 241 entitled "A Study of Asbestosis in the Textile Industry"?

ANSWER: This defendant is unaware of ever receiving this document.

55. In what year did this Defendant first become aware of the 1946 article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels" by Fleischer, Drinker, et al.

ANSWER: This defendant is unaware of ever receiving this document.

56. How many claims or lawsuits (other than workers' compensation claims) were filed against this Defendant in the 1930's alleging, in whole or in part, injury, damage or disease from exposure to or inhalation of various dusts? This interrogatory includes cases of asbestosis, pneumoconiosis and silicosis due to the fact individuals were or may have been exposed to mixed types of dusts.

ANSWER: Objection; this defendant objects to this interrogatory as overbroad and irrelevant in that it requests information regarding various dusts. The only dust at issue in this litigation is asbestos. As such, this interrogatory requests information not relevant to the subject matter of this litigation nor likely to lead to the discovery of admissible evidence.

In addition, this defendant further objects to this interrogatory as irrelevant as this defendant only became involved with asbestos-containing products in December of 1960 when it purchased Paco Textures Division. As such, this interrogatory requests information not relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, this defendant responds as follows: None as this defendant was not yet in existence during the 1930's.

57. Has this Defendant in other litigation ever alleged or admitted that the health hazards of asbestos-containing insulation products were known prior to 1945?

ANSWER: No.

EXHIBIT "A"

EXHIBIT "A"

PAGE 1 OF 2

Product	On Market	Withdrawn	Use of Asbestos Discontinued	Description	Color	Use	Weight
Bedding Cement	12/60	Not Withdrawn	1970	Dry Powder Chrysotile 6.0%	Grayish-white Powder	Embedding tape over interior gypsum board joints between 50°F and 100°F	25-lb. bag
Taping Compound	1970	Not Withdrawn	12/15/77	Dry Powder Chrysotile 0-8.3%	Grayish-white Powder	Embedding tape over interior gypsum board joints. Between 50°F and 100°F	25-lb. bag
Finishing Compound	12/60	1982	12/20/77	Dry Powder Chrysotile 0-7.5%	Yellow or Gray Powder	To conceal joints and nail holes with interior gypsum board. Between 50°F and 100°F	25-lb. bag
Quik-Set Joint Compound	1963	Not Withdrawn	1/8/78	Dry Powder Chrysotile 0-6.0%	Off-white Powder	Past Setting Joint Cement Between 45°F and 80°F	25-lb. bag
All Purpose (Triple Duty)	12/60	1982	1/10/78	Dry Powder Chrysotile 0-8.3%	Grayish-white Powder	For taping, topping and texturing. Between 50°F and 100°F	25-lb. bag
Ready Mix Taping	Unknown	4/76	Unknown	Pre-Mix Chrysotile 2.0 to 2.6%	Off-white Paste	Embedding tape over interior gypsum board joints. Between 50°F and 100°F	50-lb. ctn
Ready Mix All Purpose	12/60	Not Withdrawn	1/13/78	Pre-Mix Chrysotile 0-2.6%	Off-white Paste	For taping, topping and texturing interiors. Between 50°F and 100°F	1 gal. pail 48-lb. ctn 50-lb. ctn 62-lb. pail

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Product	On Market	Withdrawn	Use of Asbestos Discontinued	Description	Color	Use	Weight
Ready Mix Topping	1963	Not Withdrawn	1/14/78	Pre-Mix Chrysotile 0-2.6%	Off-white or Yellow Paste	To conceal joints and nail holes for inter- ior gypsum board. Between 50°F and 100°F	50-lb. ctn 62-lb. pall
Wall Texture (Bestex A)	12/60	Not Withdrawn	2/11/78	Dry Powder Chrysotile 0-8.8%	Off-white Powder	Wall texture on interiors. Between 50°F and 100°F	25-lb. bag 50-lb. bag
Texture Paint (not in California)	Unknown	Not Withdrawn	2/11/78	Dry Powder Chrysotile 0-6.7%	Off-white Powder	Texture Between 50°F and 100°F	25-lb. bag
Splatter Texture (not in Calif.)	Unknown	1980	1/12/78	Dry Powder Chrysotile 0-6.0%	Off-white Powder	Texture Between 50°F and 100°F	25-lb. bag
Sand Finish (not in Calif.)	Unknown	Not Withdrawn	1/3/78	Dry Powder Chrysotile 0-7.7%	Off-white Powder	Texture Between 50°F and 100°F	25-lb. bag
Ceiling Texture (Bestex D)	1964	Not Withdrawn	3/9/78	Dry Powder Chrysotile 0-10.0%	Off-white or White powder	Texture for interior cell- ings. Between 50°F and 100°F	31-lb. bag 32-lb. bag 40-lb. bag
Product 225	1963	Not Withdrawn	1968	Paint Chrysotile 0-6.1%	Paint	Surface Conditioner	1-gal. pall 5-gal. pall
Product 235	1972	Not Withdrawn	1978	Paint Chrysotile 0-7.5%	Paint	Tex-Bond	1-gal. pall 5-gal. pall
Product 521	1974	Not Withdrawn	1978	Paint Chrysotile 0-3.9%	Paint	Block Filler	1-gal. pall 5-gal. pall
Radiant Heat Fill	1974	Unknown	Unknown, but did not contain asbestos by 1978	Dry Powder Chrysotile	Powder	Radiant Heat Fill	Bag

EXHIBIT "B"

EXHIBIT "B"

<u>PRODUCT TRADE NAME</u>	<u>KNOWN FACTORY LOCATION</u>	<u>TIME PERIOD PRODUCED</u>	<u>KNOWN MARKETING AREAS</u>
Bedding Cement	Richmond, California San Carlos, California	12/60 to 4/64 4/64 to about 1970	California California
Taping Compound	San Carlos, California Hurst, Texas	About 1970 to 12/77 Mid 1970's only	California Colorado
Finishing Compound	Richmond, California San Carlos, California	12/60 to 4/64 4/64 to 12/77	California California
Quick-Set Joint Compounds	San Carlos, California Dallas, Texas Hurst, Texas	Late 1960's only 1963 to 6/70 6/70 to 1/78	California, Oregon, Washington & Utah California, Oregon, Washington, Utah, Texas, Oklahoma California, Oregon, Washington, Utah, Texas, Oklahoma, Colorado, Kansas, Arkansas, Arizona
Wall Texture (including Paco- Tex and Snur-hide)	Richmond, California San Carlos, California Ontario, California Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	12/60 to 4/64 4/64 to 1975 Unknown to 1/75 10/69 to 3/72 6/71 to 4/76 1963 to 6/70 6/70 to 2/78 1/69 to 8/75 8/75 to 1977	California Northern California, Oregon, Washington, Utah, Hawaii, Northern Nevada Southern California, Arizona, Southern Nevada, Hawaii Oregon, Washington Colorado Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
Texture Paint	Hurst, Texas	About 6/70 to 2/78	Texas
Splatter Texture	Hurst, Texas Denver, Colorado	About 6/70 to 1/78 About 6/71 to 4/76	Texas, Colorado Colorado
Ceiling Texture	San Carlos, California Ontario, California Houston, Texas Hurst, Texas	About 1964 to 12/77 About 1970 to 1/75 1967 to 9/74 9/74 to 3/78	California, Oregon, Washington, Utah, Nevada, Arizona, Hawaii California, Nevada, Arizona, Hawaii Texas, Oklahoma, Colorado, Kansas, Arkansas Texas, Oklahoma, Colorado, Kansas, Arkan-

PRODUCT TRADE NAME	KNOWN FACTORY LOCATION	TIME PERIOD PRODUCED	KNOWN MARKETING AREAS
Ready Mix Joint Cement (Includes All Purpose Joint Compound)	Richmond, California San Carlos, California	12/60 to 4/64 4/64 to 1/78	California California, Oregon, Washington, Utah, Nevada, Arizona, Hawaii Southern California, Arizona, Southern Nevada, Hawaii
	Ontario, California	Unknown to 1/75	Oregon, Washington Colorado Texas
Ready Mix Taping Compound	Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	10/69 to 3/72 6/71 to 4/76 1963 to 6/70 6/70 to 1/78 1/69 to 3/72 3/72 to 1977	Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
	Hurst, Texas Denver, Colorado San Carlos, California	Unknown to 1/78 Unknown to 4/76 Short time only	Texas Colorado Northern California
Ready Mix Topping Compound	Richmond (?) San Carlos, California	4/64 to 11/77	California, Oregon, Washington, Utah, Nevada, Arizona Southern California, Arizona, Southern Nevada, Hawaii
	Ontario, California	Unknown to 1/75	Oregon, Washington Colorado Texas
Ready Mix Wall Texture	Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	10/69 to 3/72 5/71 to 4/76 1963 to 6/70 6/70 to 1/78 1/69 to 3/72 3/72 to 1977	Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
	San Carlos, California	Short period only	Northern California
Paco Crete	San Carlos, California	1970 - 10/77	Northern California

ED	KNOWN MARKETING AREAS
	California Northern California, Oregon, Washin Utah, Hawaii, Northern Nevada Southern California, Arizona, South Nevada Oregon, Washington Colorado Texas Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas Southern California, Arizona Texas, Oklahoma

PAGE 2 OF 3.

<u>PRODUCT TRADE NAME</u>	<u>KNOWN FACTORY LOCATION</u>	<u>TIME PERIOD PRODUCED</u>	<u>KNOWN MARKETING AREAS</u>
Ready Mix Joint Cement (Includes All Purpose Joint Compound)	Richmond, California San Carlos, California Ontario, California Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	12/60 to 4/64 4/64 to 1/78 Unknown to 1/75 10/69 to 3/72 6/71 to 4/76 1963 to 6/70 6/70 to 1/78 1/69 to 3/72 3/72 to 1977	California California, Oregon, Washington, Utah, Nevada, Arizona, Hawaii Southern California, Arizona, Southern Nevada, Hawaii Oregon, Washington Colorado Texas Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
Ready Mix Taping Compound	Hurst, Texas Denver, Colorado San Carlos, California Richmond (??) San Carlos, California Ontario, California Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	Unknown to 1/78 Unknown to 4/76 Short time only 4/64 to 11/77 Unknown to 1/75 10/69 to 3/72 5/71 to 4/76 1963 to 6/70 6/70 to 1/78 1/69 to 3/72 3/72 to 1977	Texas Colorado Northern California California, Oregon, Washington, Utah, Nevada, Arizona Southern California, Arizona, Southern Nevada, Hawaii Oregon, Washington Colorado Texas Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
Ready Mix Tapping Compound	Richmond (??) San Carlos, California Ontario, California Kirkland, Washington Denver, Colorado Dallas, Texas Hurst, Texas Tulsa, Oklahoma Broken Arrow, Oklahoma	4/64 to 11/77 Unknown to 1/75 10/69 to 3/72 5/71 to 4/76 1963 to 6/70 6/70 to 1/78 1/69 to 3/72 3/72 to 1977	California, Oregon, Washington, Utah, Nevada, Arizona Southern California, Arizona, Southern Nevada, Hawaii Oregon, Washington Colorado Texas Texas Oklahoma, Kansas, Arkansas Oklahoma, Kansas, Arkansas
Ready Mix Wall Texture	San Carlos, California San Carlos, California	Short period only 1970 - 10/77	Northern California Northern California
Paco Crete	San Carlos, California	1970 - 10/77	Northern California

<u>PRODUCT TRADE NAME</u>	<u>KNOWN FACTORY LOCATION</u>	<u>TIME PERIOD PRODUCED</u>	<u>KNOWN MARKETING AREAS</u>
All Purpose Joint Compound (Dry)	Richmond, California	12/60 - 4/64	California
	San Carlos, California	4/64 - 12/77	Northern California, Oregon, Washington, Utah, Hawaii, Northern Nevada
	Ontario, California	Unknown - 1/75	Southern California, Arizona, Southern Nevada
	Kirkland, Washington	10/69 to 3/72	Oregon, Washington
	Denver, Colorado	6/71 to 4/76	Colorado
	Dallas, Texas	1963 to 6/70	Texas
	Hurst, Texas	6/70 to 1/78	Texas
	Tulsa, Oklahoma	1/69 to 3/72	Oklahoma, Kansas, Arkansas
	Broken Arrow, Oklahoma	7/72 to 1977	Oklahoma, Kansas, Arkansas
	Ontario, California	1970 to 1/75	Southern California, Arizona
Infra Heat Base	Hurst, Texas	1970 to 12/77	Texas, Oklahoma

EXHIBIT "C"

EXHIBIT "C"

Dr. Jerrold Abraham, Department of Pathology, State University of New York, 750 East Adams Street, Syracuse, New York 13210 (315) 464-4750.

Dr. Elvin Adams, Rt. 4, Box 614-B, Burleson, Texas 76028, 11803 South Freeway, Suite 201, Fort Worth, Texas 76115. Dr. Adams is a medical doctor and a board certified specialist in internal medicine. His testimony may discuss the structure and function of the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

Dr. Charles R. Adcock, 1100 Holly Avenue, South Pittsburg, Tennessee 37380 and/or his custodian of records.

Thomas E. Addison, M.D., Pulmonologist, Internist; Mount Zion Hospital, 1600 Divisadero Street, San Francisco, California, (415) 567-7255. Dr. Addison may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis and issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Thomas Adkins, 38252 River Drive, Lebanon, Oregon 97355 (503) 285-2147.

Dr. Roy Agner, 611 Mocksville Avenue, Salisbury, North Carolina 28144 and/or his custodian of records.

Edward Allebach, 109 Emerald Avenue, Westmont, New Jersey 08108-2401 (609) 854-9120.

Dr. Dean Allen, Huntsville, Alabama and/or his custodian of records.

Alvin C. York Veteran's Affairs Medical Center, Custodian of Records, 3400 Lebanon Road, Murfreesboro, Tennessee 37129.

Dr. Masoud Alzeerah, 1901 Medi Park, Amarillo, Texas 79106 (806) 355-9248.

Ronald Amede, M.D., 1430 Tulane Avenue, New Orleans, La. 70112 (504) 588-5451.

Mr. Arnold E. Anderson, Tribo Diagnostic Corp., P. O. Box 2008, Livonia, Michigan 48151 (313) 417-6507. Mr. Anderson has expertise in the composition, manufacture, use and wear characteristics of friction materials. He may be asked to testify concerning the following matters: (a) the science of tribology; (b) the types, characteristics and chemical properties of asbestos used in friction materials and their pathogenic potential; (c) the types, composition and manufacture of friction materials; (d) the history of friction materials, the use of

asbestos in friction materials and the availability of substitutes for asbestos; (e) decomposition of asbestos in friction materials during the wear process; (f) the nature of residual materials after wear; and (g) the effects of wear debris in the occupational environment of workers where friction materials are used.

If called, he is expected to testify concerning certain other aspects of and basis for these general areas of opinions relating to this cause or other matters of fact regarding friction materials which because technical nature may contain some opinions.

Gregory Anderson, M.D., Pulmonologist, Internist; Respiratory Medical Group, 130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California, 94598, (510) 944-0166. Dr. Anderson may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos.

Alred Angrist, deceased (by deposition).

Dr. W. A. Anthony, Deceased, Custodian of Records, Gastonia, North Carolina.

Dr. Larry Arcement, North Baldwin Hospital, Box 35021, Bay Minette, Alabama 36507 and/or his custodian of records.

Dr. Alan H. Arrington, 250 Chateau Drive, ste. 225, Huntsville, Alabama 35801 and/or his custodian of records.

Dr. William M. Asher, 9516 Neumann Drive, Elberta, Alabama 36530 (334) 986-7650.

Atlanta Gastroenterology, Custodian of Records, Atlanta, Georgia.

Atlanta-South Gastroenterology, Custodian of Records, East Point, Georgia.

Dr. Oscar Auerbach, 158 Longhill Drive, Short Hills, New Jersey 07078. Dr. Auerbach is a pathologist. He may testify to all matters pertaining to scientific study and research concerning exposure to asbestos in regard to development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays, and pathology material; his expert opinion regarding whether plaintiff suffers from a respiratory disease and cause of such disease, including but not limited to asbestosis; and all other matters concerning plaintiff's medical condition.

Professor Howard Ayre, 2812 Linwood Avenue, Cincinnati, Ohio 45209. Professor Ayre may testify as to the history of TLV; State of the Arts as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants; the potential of exposure in excess of the TLV as it concerns certain asbestos containing products; and the dust levels created by this defendant's products.

Dr. Stephen Ayres, Sanger Hall Room 1-014, Box 565, MCV Station, Richmond, Virginia 23298. Dr. Ayres is a pulmonary specialist. Dr. Ayres may testify as to all matters pertaining to the history of scientific knowledge, research and study concerning exposure to asbestos and its effects on the human body; as to all state of the art research issues; as to his expert opinion as to safe levels of asbestos exposure and the basis for such opinions; as to the exposure to asbestos in regards to development of respiratory disease, including but not limited to asbestosis, lung cancer, and mesothelioma; as to the effects of exposure to the chrysotile fiber and other asbestos fibers.

Edward J. Baier, 9754 Hatmark Court, Vienna, Virginia 22181; (703) 281-9501. Mr. Baier is an industrial hygienist who may testify concerning state of the art as it relates to asbestos.

Dr. Bob Baird, 3600 Gaston #806, Wadley Tower, Dallas, Texas 75246. Dr. Baird may testify about the examination and diagnosis of the physical condition of a particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos, and may testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, and Gaensler.

Dr. James Ballard, Princeton Diagnostic, 817 Princeton Avenue, Birmingham, Alabama (205) 783-3700.

Dr. J. Alan Barksdale, Shoals Medical Lab, 501 North Montgomery Avenue, Valley Federal Building, Sheffield, Alabama 35660, (205) 383-1160.

Dr. John E. Barsa, 4178 N. Armenia, Tampa, Florida 33607 and/or his custodian of records.

Fred Bass, Bass Consultants, Inc., 530 Wells Fargo, Suite 101, Houston, Texas 77090. Mr. Bass may testify about the economic aspects of the case.

Dr. Joseph Bates, 4300 West 7th Street, Little Rock, Arkansas 72205. Dr. Bates will testify concerning his examination and diagnosis of the physical condition of a particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos, and may testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, and Gaensler.

Hector A. Battifora, M.D., Pathologist; City of Hope Medical Center, Division of Pathology, 1500 East Duarte Rd., Duarte, California 91010 (818) 359-8111. Dr. Battifora may testify regarding pathological aspects of the case, plaintiff's condition and issues of alternative causation.

David Bayliss, RD 689, Room 3812-C, United States EPA, 401 "M" Street, SW, Washington, D.C. 20460. Government testing of worksite and environmental chemicals and substances.

Dr. Jeff H. Beard, 3715 Dauphin Street, Mobile, Alabama 36608 and/or his custodian of records.

Beckley Hospital, Custodian of Records, 306 Stanford Road, Beckley, West Virginia 25801.

Stephen Berger, 10564 Eastborne Ave., Los Angeles, California 90024.

Colleen J. Bergin, M.D., M.B., Ch.B., UCSD Medical Center, Department of Radiology (8756), 225 Dickinson Street, San Diego, CA 91203-8756, (619) 543-2280. Dr. Bergin may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Bernard, retired, Pleasant Grove, Alabama and/or his custodian of records.

Bessemer Carraway Medical Center, Custodian of Records, Box 847, Bessemer, Alabama 35021.

Scott R. Bickford, Martzell & Bickford, 338 Lafayette Street, New Orleans, La. 70130 (504) 581-9065.

Dr. A. K. Black, 701 Lloyd Nolan Parkway, Fairfield, Alabama 35064 and/or his custodian of records.

George Blackwood, Winchester, MA.

Dr. Gregory P. Blair, 9155 S.W. Barnes, Ste. 830, Portland, Oregon 97225, (503) 297-3778.

Dr. Harry Blair, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Dr. Gail Blakley, 215 Milby Street, Houston, Texas 77003 (713) 225-0463.

Bernard Blaney, 925 Allamanda Dr., Delray, Florida 33483, 407-265-0328. Mr. Blaney is a former Treasurer of Rapid and is expected to testify regarding the corporate history of Rapid, facts supporting Rapid's Special Appearance to Present Motion

Objecting to Personal Jurisdiction, facts supporting Rapid's denial of liability as an alleged successor to Philip Carey Manufacturing Company, Rapid's corporate history, facts supporting Rapid's denial of liability for punitive damages, the business operations of Rapid, the fact that Rapid never manufactured asbestos-containing products, the impact of asbestos-related litigation on Rapid, any defenses asserted by Rapid, Rapid's lack of relationship with the Celotex Corporation, and other facts relating to Rapid.

Dr. Alton Blow, 1300 North 4th Street, Longview, Tx. 75601 (903) 757-2122.

Kenneth J. Boudreaux, Ph.D., Consulting Economist, A.B. Freeman School of Business, Tulane University, 1424 Boudreaux, New Orleans, Louisiana 70116. Dr. Boudreaux is an economic consultant and may testify regarding plaintiff's economic loss, past, current, and future, if any.

Dr. Thomas Boylen, 1200 N. State Street, Los Angeles, California 90033. General and asbestos-related pulmonary medicine examination procedure.

Dr. Brian Bradley, The Lung Center, 4003 Woodlawn, Pasadena, Texas 77504. Dr. Bradley is a medical doctor. He may testify about the medical condition of the plaintiff and about asbestos-related diseases.

Brandon Hospital, Custodian of Records, Brandon, Florida.

Barbara Branson, M.D., Rheumatologist; 120 La Casa Via, Suite 211, Walnut Creek, Ca 94598 (510) 256-9887. Dr. Branson may testify regarding plaintiff's medical condition(s), medical history, prognosis and issues of alternative causation including but not limited to those conditions specifically within the area of expertise of a rheumatologist and life shortening problems not related to alleged asbestos exposure.

William S. Breall, M.D., Cardiologist, Internist: 1150 Bush Street, Suite 4A, San Francisco, California 94109, (415) 775-2277. Dr. Breall may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Arnold R. Brody, Ph.D., Tulane University Medical Center, School of Medicine, Department of Pathology & Laboratory Medicine SL79, 1430 Tulane Avenue, New Orleans, La. 70112-2699 (504) 588-5224.

Dr. Barry L. Brown, 3701 Dauphin Street, Mobile, Alabam a 36608 and/or his custodian of records.

Dr. Kevin Browne, 66a Warwick Way, London, England SW1V 1RZ. Cancer issues, e.g., cancer risk, relationship between asbestosis and lung cancer, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. General and asbestos-related pulmonary medicine issues and epidemiology relevant thereto.

Dr. James Bruce, Lufkin Pathology Laboratory, 700 Gaslight Boulevard, Lufkin, Texas 75901 (409) 632-5992.

Mr. Sidney J. Burgeson, W. W. Henry Co., 5608 Soto St., Huntington Park, California 90255. Mr. Burgeson was employed by The Synkoloid Company for a period of time and is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

Louis Burgher, M.D., Ph.D., 145 North Tower Doctors Building, 4242 Farnam Street, Omaha, Nebraska 68131 (402)559-2900. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure. This witness may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a bases for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Anthony L. Burke, 709 Barker Street, Salisbury, North Carolina 28145 and/or his custodian of records.

Dohrman H. Byers. Mr. Byers was the Chief of Analytical Chemistry Service, United States Department of Public Health from 1949 through 1959. He may testify about how he and the United States Public Health Service determined how to apply the Threshold Limit Value for asbestos during the period of time which he occupied that position.

Dr. Samuel H. Cade, Radiology Department, Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75242. Dr. Cade is a B Reader and will testify regarding the radiographs of the plaintiff and/or plaintiff's decedent.

Dr. Edwin Cadman, M.D., University School of Medicine, 333 Cedar Street, New Haven, CT. 06510. Dr. Cadman is a licensed physician and Professor of Medicine who specializes in oncology. He is expected to testify as to the history and development of medical knowledge concerning asbestos-related disease. He may also

testify regarding the relationship, if any, between asbestos and plaintiff's medical condition.

George E. Caesar, Jr., 2940 Camino Diablo #300, Walnut Creek, Ca. 94596. Mr. Caesar is certified in the comprehensive practice of industrial hygiene and may be called to testify regarding his knowledge of the types of products manufactured and/or distributed by Kelly-Moore, their use and potential exposure to airborne asbestos fibers experienced by plaintiffs who either worked directly with the products or claim vicinity exposure. Mr. Caesar may also testify as to plaintiff's total exposure to asbestos and what role plaintiff's exposure to asbestos-containing products manufactured and/or distributed by Kelly-Moore, if any, played in the context of plaintiff's total exposure. Mr. Caesar may also testify as to the industrial hygiene state of the art regarding asbestos-related disease and industry knowledge of any hazards which may have been associated with use of products such as those manufactured by Kelly-Moore which contained asbestos.

Dr. Phillip Cagle, Baylor College of Medicine, One Baylor Plaza, 6565 Fannin, MS 205, Houston, Texas 77030. Dr. Cagle is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition.

Dr. Joseph Calhoun, #1 St. Vincent Circle, Suite 160, Little Rock, Arkansas (501) 666-9400.

John T. Cantlon. Mr. Cantlon will testify by deposition concerning Philip Carey in general and the authenticity and admissibility of certain documents relating to Philip Carey.

Paul E. Caplan, 1484 Sigma Circle, Cincinnati, OH 45255.

Dr. Capps and Dr. Scherer, V.A. Medical Center, Biloxi Division, 400 Veterans Blvd., Biloxi, Mississippi 39531 and/or their custodian of records.

Cararrus Memorial, Custodian of Records, 920 Church Street N., Concord, North Carolina 28025.

Dr. Carmichael, Fairfield, Alabama, and/or his custodian of records.

Carolina Medical Center, Custodian of Records, 1000 Blythe Boulevard, P. O. Box 32861, Charlotte, North Carolina 28232.

Dr. Carp, Birmingham, Alabama and/or his custodian of records.

Carraway Methodist Hospital, Custodian of Records, Bessemer, Alabama.

Carolina Surgical Clinic, Custodian of Records, Charlotte, North Carolina.

Dr. Greg Casar, Respiratory Consultants of Houston, Smith Tower, 6550 Fannin, Suite 2403, Houston, Texas 77030. Dr. Casar is a specialist in the area of respiratory disease. He will testify as to all matters pertaining to his examination of plaintiff(s) and plaintiff(s)' medical records; any communications with plaintiff(s) or plaintiff(s)' family; review of x-rays of plaintiff(s); the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff(s) suffer(s) from asbestos-related disease and the basis for such opinion; the plaintiff(s)' current medical condition and his prognosis in regard to plaintiff(s)' medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its effects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the effect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Michael Case, Presbyterian Health Services,, 200 Hawthorne Lane, Charlotte, North Carolina 28204 and/or his custodian of records.

Casner & Edwards, Boston, MA.

Dr. Barry Castleman, 1722 Linden Avenue, Baltimore, Maryland 21217 (410) 462-5135.

Charlotte Cardiology Associates, Custodian of Records, P. O. Box 222067, Charlotte, North Carolina 28222.

Charlotte Cardiothoracic Surgical Associates, Custodian of Records, Charlotte, North Carolina.

Dr. Richard Chandler, 3401 Plains Boulevard, Amarillo, Texas 79102 (806) 355-9531.

Dr. O. J. Chastain, 701 East Marshall, Ste. 504, Longview, Tx. 75601 (903) 236-2777.

Melvin Cheitlin, M.D., Cardiologist, San Francisco General Hospital, 1001 Potrero Avenue, Room 5G1, San Francisco, California (415) 206-8315. Dr. Cheitlin may testify regarding his knowledge of cardiovascular functions, plaintiff's medical condition and prognosis and issues of alternative causation.

Dr. Andrew Churg, The University of British Columbia, 2211 Wesbrook Mall, Vancouver, B.C. Canada V6T1W5. Dr. Churg is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and to the effects of exposure to chrysotile fibers on the human body.

Dr. Joseph Cimino, New York Medical College, 50 Willard Avenue, North Tarryton, NY 10591. Dr. Cimino is presently Professor and Chairman of the Department of Community and Preventative Medicines New York Medical College, Valhalla, New York. Dr. Cimino may be expected to testify generally about research in the area of pulmonary pathology and about the process by which medical knowledge evolved. He may also be expected to testify regarding the state of medical knowledge from the early part of the century to the middle 1960s as it regards pathological changes due to exposure to asbestos and about his conclusions regarding his studies conducted by the Saranac Laboratories as they related to the state of the medical knowledge at that time. This defendant believes that Dr. Cimino is of the opinion during most of this century the state of the medical art was that exposure to large amounts of asbestos over an extended period of time could cause asbestosis; however, there was an accepted, safe level of exposure below which there was no risk of harm; that this level was accepted by the medical and scientific community; and that there was no acceptance of a link between asbestosis and mesothelioma or any form of cancer. The opinions of Dr. Cimino are based upon his training in medicine, his extensive

professional qualifications, his research in pulmonary pathology and his review of the relevant medical literature.

Dr. Mark Clark, Pulmonary and Critical Care Consultants, 1305 West 34th Street, Suite 400, Austin, Texas 78705-1169 (512) 459-6599.

Dr. Clarres, Austell, Georgia 30001 and/or his custodian of records.

Dr. Wayner Cline, 909 W. Henderson Street, Salisbury, North Carolina 28144 and/or his custodian of records.

Cobb Hospital and Medical Center, Custodian of Records, 3950 Austell Road, Austell, Georgia 30001.

Dr. C. Glenn Cobbs, Veterans Affairs Medical Center, 700 South 19th Street, Birmingham, Alabama, (205) 933-8101.

Edward Mitchell Cohen, M.D., Cardiologist, Internist, 2299 Post Street, Suite 207, San Francisco, California 94115 (415) 567-9469. Dr. Cohen may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Michael Cohen, M.D., Pulmonologist, Internist; Respiratory Medical Group, 130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California 94598, (510) 944-0166. Dr. Cohen may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Richard Cohen, 19242 Panorama Dr., Saratoga, California 415-424-5156.

Thomas V. Colby, M.D., Surgical Pathologist; St. Mary's Hospital, Mayo Clinic, 1216 Second Street Sw, Rochester, Minnesota 55902, (507) 284-2511. Dr. Colby may testify regarding the pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. William S. Cole, 821 Sunnbrook, Melbourne, Florida 32935. Dr. Cole is a B-reader and will testify regarding the radiographs of the plaintiff(s) and/or plaintiff(s)' decedent.

Patrick Colletti, M.D., Nuclear Medicine Specialist; LAC/USC Medical Center, General Hospital, 1200 N. State Street, Los Angeles, California 90033, (213) 226-7852. Dr. Colletti may testify regarding the diagnostic capabilities and limitations of

gallium scan studies in the context of benign asbestos related disease.

James Collins, M.D., Radiologist; U.C.L.A. Medical Center Radiology, 10833 Le Conte Avenue, West Los Angeles, California 90024, (213) 825-7180. Dr. Collins may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. James L. Comadoll, 400 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

John P. Conroy, Artra Group, P. O. Box 8903, Northfield, Illinois 60093. Mr. Conroy is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

Maceo Cook, 1070 Legion Club Road, Salisbury, North Carolina 28144 (704) 279-3089.

Warren Cook, 6376 Plankton Drive, Columbus, Ohio (614) 864-5277. Mr. Cook is an industrial hygienist who may testify concerning state of the art regarding asbestos.

Kirby B. Cooper, Ph.D., 3399 Sweet Drive, Lafayette, CA 94549; Phone: (510) 646-5564, Epidemiologist, may be called to testify regarding his knowledge of the history of the development of medical knowledge related to asbestos-related disease and epidemiological issues in relationship between asbestos exposure and any increased risk of cancer and life shortening problems not related to alleged asbestos exposure. He may also testify by deposition transcript and trial transcript.

As may be necessary to establish the epidemiological acceptability of certain of Dr. Cooper's assumptions, the defendants may call Dr. Duncan Thomas and/or Dr. Noel Weiss.

Dr. W. Clark Cooper, M.P.H., 2150 Shattuck Avenue, Ste. 811, Berkley, Ca. 94704.

Dr. Pacifico Cordon, Brandon, Florida and/or his custodian of records.

Palmer Covil, Covil Corporation, Greenville, South Carolina. Mr. Covil will testify by deposition as to matters concerning the insulation contracting and supply business including but not limited to work practices, product usage and labeling. Mr. Covil's prior recorded testimony given July 13, 14 and 15, 1977 in Cause Nos. 77-1369 and 77-1384; Evelyn White, et al. v. Combustion Engineering Co., Inc., et al; In the United States District Court of South Carolina - Greenville Division.

Bobby F. Craft, Industrial Health, Inc., 640 East Wilmington Avenue, Salt Lake City, Utah 84106. Dr. Craft may testify as to the history of TLV; State of the Art as it concerns the development of knowledge of hazards associated with asbestos; testing of dust levels at various plants; the potential of exposure in excess of the TLV as it concerns certain asbestos containing products; and the dust levels created by this defendant's products.

Dr. John E. Craighead, Chairman, Department of Pathology, A249 Given Medical Building, University of Vermont College of Medicine, Burlington, Vermont 05401, (802) 863-8733. Dr. Craighead is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and the effects of exposure to chrysotile fibers on the human body.

Dr. James Crapo, Duke University Medical Center, Box 3177, Room 350 Bell Bldg., Durham, N.C. 27710 (919) 684-6266. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs. Epidemiology and general medicine regarding asbestos exposure; may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Dallas Cravent, 2104 Randolph Road, Charlotte, North Carolina 28207, and/or his custodian of records.

Crawford Long Hospital, Custodian of Records, 550 Peachtree Street Northeast, Atlanta, Georgia 30365.

Andrea Crichton, Manchester, England.

Bill Culver, P. O. Box A, 102 C Street SW, Auburn, Washington 98001, (206) 763-8623.

David Curreri, Cambridge, MA.

DCH Regional Medical Center, Custodian of Records, 809 University Boulevard, Tuscaloosa, Alabama 35401.

J.N.P. Davies, 5 Pine Street, Albany, New York. State of medical and scientific art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and medical condition of plaintiff(s); may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Michael Davis, 6701 Airport Blvd., Mobile, Alabama 36608 and/or his custodian of records.

Dayton-Walther Corporation (or its successor corporation) - certain employees or former employees.

Dr. Mark Deffebach, VA Medical Center, 3710 S.W. U.S. Veterans Road, Portland, Oregon 97201 (503) 220-8262.

Dr. George Delclos, Assistant Professor of Medicine, Baylor College of Medicine, Respiratory Consultants, 6550 Fannin, Houston, Texas. Dr. Delclos is a specialist in the area of respiratory disease. Dr. Delclos may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos-related disease and the basis for such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment

and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. John Dement, Duke University Medical School, Department of Occupational & Environmental Medicine, 2200 West Main Street #700, Durham, North Carolina 27710 (919) 286-3232.

Dr. Harry Demopoulos, 550 First Avenue, New York, New York 10016. Dr. Demopoulos is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; to the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-ray, and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; to all matters pertaining to the plaintiff's medical condition; to all state of the art issues.

Lois Dennis, 2017 Hudson Terrace, Fort Lee, NJ 07024.

Dr. Paul Diamond, Alvin C. York Veteran's Affairs Medical Center, 3400 Lebanon Road, Murfreesboro, Tennessee 37129 and/or his custodian of records.

Dr. Steven Dikman, One Gustave Place, Annenberg Building 15/58, Department of Pathology, New York, New York 10029 (212) 241-7353, (212) 241-8014.

Dr. Dillinger (retired), Rome, Georgia 30161, and/or his custodian of records.

Dr. Peter Ditoro, 930 Franklin Street, Ste. 205, Huntsville, Alabam 35801 and/or his cusodian of records.

Ronald F. Dodson, Ph.D., Chairman, Department of Cell Biology and Environmental Sciences, University of Texas Health Center at Tyler, Office of Associate Director for Research, P. O. Box 2003, Tyler, Texas 75710. Dr. Dodson is an expert in the area of microscopic study relating to pathology. If called, Dr. Dodson will testify regarding: (a) pathological studies, if any, relating to the plaintiff; (b) matters relating to whether the plaintiff has a condition or illness caused by asbestos exposure; and (c) matters relating to lung fiber deposition.

Dr. Scott Donaldson, North Texas Pulmonary Associates, 375 Municipal Drive, Suite 140, Richardson, Texas 75080. Dr. Donaldson is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications

with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinions regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Bruce P. Douglas, 2425 Samaritan Drive, San Jose, California 95124, (408) 559-2474.

Dr. John Doull, University of Kansas Medical Center, Department of Pharmacology, Toxicology and Therapeutics, 39th & Rainbow Boulevard, Kansas City, KS 66103. Dr. Doull is expected to testify regarding the protocol, methodology, and analysis of scientific studies including cancer experimentation, custom and practice regarding peer review, and the editing and publishing of scientific work.

Dr. Hardy Downing, 810 Whetstone Street, Monroeville, Alabama 36460 (334) 575-4825.

Edward Drasin, M.D., Radiologist; Radiology Department, Summit Medical Center, Hawthorne and Webster Streets, Oakland, California 94609, (510) 420-6088. Dr. Drasin may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Charles Henry Drummond, III, Ceramic Engineering, Ohio State University, 2041 College Road, Columbus, Ohio 43210.

Dr. Lewis Duncan, 1300 North 4th Street, Longview, Tx. 75601 (903) 757-2122.

Christopher J. Dunn, M.D., Pulmonologist, Internist; 77 Birch Street, Suite A, Redwood City, California 94062 (415) 366-0519. Dr. Dunn may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

William Dyson, Ph.D., Health & Hygiene, Inc. 420 Gallimore Dairy Road, Greensboro, North Carolina. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiff(s); epidemiology and general medicine regarding asbestos exposure; may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a bases for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Dr. Scott Ebbinghaus, 3049 Fox Trail, Fultondale, Alabama 35068 (205) 631-3199.

Dr. David Egilman, South Shore Health Center, 759 Granite Street, Braintree, Massachusetts 02184-5328 (617) 848-1950.

Dr. Bruce Eich, 801 Princeton, Birmingham, Alabama and/or his custodian of records.

Merril Eisenbud, 711 Bay Berry Drive, Chapel Hill, NC 27514.

Dr. Horace Elmore, retired, Stephenson, Alabama and/or his custodian of records.

Dr. William Emory, M.D., Ochsner Clinic, 1514 Jefferson Highway, New Orleans, Louisiana 70121, (504) 838-4055. Dr. Emory is a medical doctor. He may testify regarding the medical condition of the plaintiff and about asbestos-related diseases.

Dr. William Eschenbacher, Baylor College of Medicine, Department of Internal/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Eschenbacher may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the

nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; 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; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Charles E. Evans, Jr., P. O. Box 568, East Spencer, North Carolina 28039-0568.

Dr. William Ewing, Government Street, Mobile, Alabama, and/or his custodian of records.

Dr. Farrington, 401 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. Arthur Feinstein, 490 Peachtree St., N.E., Doctor's Bldg., Atlanta, Georgia and/or his custodian of records.

Willie Fields, 4239 South Claiborne Street, New Orleans, La. 70118 (504) 891-5544.

Dr. Gary Fink, P. O. Box 610, Faith, North carolina 28041 and/or his custodian of records.

Dr. Melvin W. First, Harvard School of Public Health, 655 Huntington Avenue, Boston, MA 02115. Dr. First may testify on matters relating to industrial hygiene, including the methodology of conducting industrial hygiene surveys and reporting and publishing results of industrial hygiene surveys.

Jonathan Fish, M.D., Radiologist; 1844 San Miguel Drive, Walnut Creek, California 94596, (510) 947-0560. Dr. Fish may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Nathan Fochtman, Rt. 6, Box 49, Montevallo, Alabama 35115 (telephone unknown).

Alma Fortenberry, et al. v. Raymark Ind., Inc., et al.,
(depositions) No. B-84-1167-CA (U. S. District Court, Eastern
District of Texas, Beaumont Division) (July 25, 1988).

Dr. Gregory Foster, North Texas Pulmonary Associates, 375
Municipal Drive, Suite 140, Richardson, TX. 75080. Dr. Foster is
a specialist in the area of respiratory diseases; he may testify
to all matters pertaining to his examination of the plaintiff and
plaintiff's medical records; any communications with the
plaintiff or plaintiff's family; review of x-rays of the
plaintiff; his opinion regarding whether plaintiff suffers from
asbestos-related disease and the basis of such opinion; the
plaintiff's current medical condition and his prognosis thereof;
the anatomy and function of the respiratory and circulatory
systems; the nature of asbestos; the symptomology, disease
process and diagnosis of asbestosis and cancer associated with
the respiratory system, peritoneum and peritoneal cavity; the
nature and extent of medical and scientific knowledge regarding
any association of pulmonary disease with asbestos exposure; the
affect of exposure to substances other than asbestos on the
development and manifestation of obstructive and restrictive
conditions and diseases of the respiratory system; methods of
diagnosis of various diseases, especially the means of
establishing the differential diagnosis of alleged asbestos-
related diseases with other non-asbestos-related disease;
incidence of lung cancer among individuals with asbestosis as
compared to non-asbestotic asbestos workers and to the general
population; cigarette smoking and its affects on the lungs; the
relationship of cigarette smoking to cancer of the lung and
cancers of other body parts with reference to epidemiology
studies and physiologic affect; the difference between impairment
and disability; the affect of asbestosis and disability and life
expectancy; and the lack of relationship between the presence of
pleural plaques and a later development of any form of cancer.

Foyd Medical Center, Custodian of Records, Box 233, Rome, Georgia
30162.

Dr. Robert G. Fraser, 2766 Summit Circle, Birmingham, Alabama
35216 (205) 979-1123; Padanarum Road, P. O. Box 558, Bolton
Landing, New York 12814 (518) 644-2220.

Dr. Peter Fuchs, St. Vincent Hospital & Medical Center,
Department of Pathology, 9205 S.W. Barnes Road, Portland, Oregon
97225, (503) 291-2181.

Dr. Cullie F. Funderbunk, Texas Tech University, 1400 Wallace
Boulevard, Amarillo, Texas 79106, (806) 354-5660.

Dr. Edward A. Gaensler, Boston University Medical Center, 80 East
Concord Street, Boston, Massachusetts 02118. Dr. Gaensler may
testify as to the anatomy and function of the respiratory and

circulatory system; the nature of asbestos; the symptomatology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of obstructive pulmonary disease with asbestos fiber exposure; 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; methods of diagnosis of various diseases particularly means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related diseases; incidence of lung cancer among individuals with asbestosis, compared with non-asbestotic asbestos workers and with the general population; cigarette smoking and its effect on the lung; the relationship of cigarette smoking to cancer of the lung and cancers of other sites with reference to epidemiological studies and physiologic effect; difference between impairment and disability; effect of asbestosis on disability and life expectancy; the lack of a relationship between presence of pleural plaques and a later development of any form of cancer; and the history of evolution and knowledge of asbestos-related diseases.

Dr. Joe G.N. Garcia, The University of Texas Health Center at Tyler, P. O. Box 2003, Tyler, Texas 75710. Dr. Garcia may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population, cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Ted Garcia, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Ignacio Garza, 745 East Street, Brownsville, Texas 78520 (512) 546-1655. An economist who will testify regarding plaintiff(s)' economic damages and related matters.

Gastonia Memorial Hospital, Custodian of Records, 2525 Court Drive, Gastonia, North Carolina 28054.

Dr. Richard Gaze, deceased (by deposition).

Dr. Bernard Gee, Yale University, 333 Cedar Street, New Haven, Connecticut 06510. Dr. Gee will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. He will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Georgia Baptist Medical Center, Custodian of Records, 300 Blvd., N.E., Atlanta, Georgia.

M. Eric Gershwin, M.D., Professor of Medicine, Chief, Division of Rheumatology, Allergy and Clinical Immunology, University of California at Davis, Davis, California 95616, (916) 752-2884. Dr. Gershwin is a specialist in the immune system and may testify about the immune system as it relates to the various theories advanced by plaintiffs in the asbestos litigation.

Dr. Allen Gibbs, Llandough Hospital, Penarth, Glamorgan CF61XW. General asbestos-related pulmonary pathology and medical literature relevant thereto; general and asbestos-related pulmonary pathology examination procedures.

Graham W. Gibbs, Ph.D., Box 27, Site 17 RR2, Winterburn, Alberta, Canada T0E 2N0 (403) 987-2883.

Dr. Gibbs has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant asbestos; (f) the effects of wear and the occupational

environment of workers in which these products are used; (g) federal laws and regulations governing asbestos exposure; (h) threshold limit values and time-weighted averages; (i) characteristics and epidemiology of asbestos-related diseases; (j) relevant medical and scientific literature on these subjects; (k) the concepts of toxicity and hazard, including discussion of the human body's natural defense system; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Don Gibson, Celotex Corporation, Tampa, Florida. Will testify either by deposition or by prior trial testimony, including trial testimony given in Charlene Yerby, Individually and as Personal Representative of the Heirs and Estate of J. D. Yerby, Deceased, et al. v. Fibreboard Corporation, et al; Cause No. 88-10329M, in the District Court of Dallas County, 298th Judicial District, dated March 5, 1990. He will testify regarding the authenticity and admissibility of certain Philip Carey Manufacturing Company or Celotex documents and other matters regarding Philip Carey or Celotex. Mr. Gibson's testimony was given in his capacity as Manager of Safety and Property Conservation.

Dr. Valerian A. Gieri, 2031 S. Crockett Street, Amarillo, Texas 79109.

Dr. William Giessel, 215 Milby Street, Houston, Texas 77003, 713-225-0463.

James Girard, Ph.D., 6328 Karmich Street, Fairfax Station, Virginia 22039.

Dr. Larry Gish, 611 Mocksville Avenue, Salisbury, North Carolina 28144 and/or his custodian of records.

John T. Gmelich, M.D., Pathologist; Department of Pathology, Huntington Memorial Hospital, 100 Congress Street, Pasadena, California 91105, (818) 440-5229. Dr. Gmelich may testify regarding the pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Allan Goetsch, 119 Longwood Drive, S.W., Huntsville, Alabama 35801 and/or his custodian of records.

Jeffrey A. Golden, M.D., Pulmonologist, Internist; UC Medical Center, 505 Parnassus, San Francisco, California 94122, (415) 476-1000. Dr. Golden may testify regarding his knowledge of

lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Allan Goldstein, Montclair Baptist Medical Center, 850 Montclair Road, Suite 862, Birmingham, Alabama 35213. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos; he will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Dr. Gonzola, Bessemer, Alabama and/or his custodian of records.

Susan Gootnick, M.D., Radiologist; 329 Goodhill Road, Kentfield, California 94904, (415) 461-4006, may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Camal Goral, retired, Lloyd Nolan Hospital, Fairfield, Alabama 35064 and/or his custodian of records.

Dr. John Gotchall, Corvallis Clinic, 3680 N.W. Samaritan Drive, Corvallis, Oregon 97330 (503) 754-1150.

Dr. Ronald Gots, National Medical Advisory Service, 7315 Wisconsin Avenue, Suite 802 West, Bethesda, Maryland, 20814-3292.

Dr. George P. Gray, 204 Lowe Avenue S.E., Huntsville, Alabama and/or his custodian of records.

Dr. Milton Gray, 521 Crestbend, Houston, Texas. Dr. Gray is a medical doctor and a board certified specialist in internal medicine. His testimony may discuss the structure and function of the respiratory system, the effects of cigarette smoking, and diseases of the lungs, including asbestos-related diseases.

E. Marie Greene, et al. v. Amtorg Trading Corp., et al.
(depositions), Docket No. L-068486-81 (Superior Court of New Jersey Law Division, Middlesex County) (Aug. 23, 1988).

Dr. Donald Greenberg, The Methodist Hospital, Department of Pathology, 6565 Fannin, 2nd Floor, Houston, Texas 77030. Dr. Greenberg is a pathologist. He may testify to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; the exposure to asbestos and the development of lung cancer, mesothelioma and other respiratory diseases; to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion to whether plaintiff suffers from a respiratory disease and the cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the

basis for such opinion; to all matters pertaining to the plaintiff's medical condition; to all state of the art issues.

Dr. Claude Grigg, 300 Billingsly Road, Building 200, Charlotte, North Carolina 28211 and/or his custodian of records.

Dr. David H. Groth, 8953-C Harper Points Drive, Cincinnati, Ohio 45249 (513) 489-6351.

Dr. Paul J. Guentert, 701 East Marshall Avenue, Ste. 302, Longview, Texas 74501 (903) 236-2740.

David S. Gullion, M.D., Oncologist, Internist; 1350 S. Eliseo, Suite 200, Greenbrae, CA 94904, (415) 925-5000. Dr. Gullion may testify regarding the alleged connection between plaintiff's medical condition and his or her alleged asbestos exposure, the treatment of and prognosis of plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Venkataiah Gutta, Gaffney Medical Center, Box 4, Gaffney, South Carolina 29342 and/or his custodian of records.

HCA Parkridge Medical Center, Custodian of Records, 2333 McCallie Avenue, Chattanooga, Tennessee 37404.

Andrew T. Haas, 13800 Overton Lane, Silver Springs, Maryland. Authentication of asbestos workers magazine, publication and distribution, safety information and meetings and union activities.

John L. Hadley, M.D., Pulmonologist, Internist; Diablo Pulmonary Medical Group, 2222 East Street, No. 300, Concord, California 94520 (510) 676-2942. Dr. Hadley may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Kathryn A. Hale, 6550 Fannin, Suite 1215, Houston, Texas 77030, (713) 790-6492.

Dr. William L. Hall, 4724 Airport Boulevard, Mobile, Alabama 36608 and/or his custodian of records.

J. S. Hamilton, Chicago, Illinois.

Dr. Sam Hammar, Diagnostic Specialties Laboratory, 700 Lebo Blvd., P. O. Box 2171, Bremerton, Washington 98310 (206) 479-7707.

Dr. William C. Hansford, Lloyd Nolan Hospital, Fairfield, Alabama 35064 and/or his custodian of records.

Dr. Russell M. Harley, University of South Carolina, 171 Ashley Avenue, Charleston, S.C. 29401. Dr. Harley is an expert in the field of pathology and the etiology and diagnosis of asbestos-related diseases based upon review of tissue and tissue slides obtained as a result of biopsy or autopsy.

Dr. Randall C. Harper, St. Luke's Lutheran Hospital, 7930 Floyd Curl Drive, San Antonio, Texas 78229.

Dr. Charles Harr, Suite 103, Charlotte Medical Plaza, 300 Billingsly Road, Charlotte, North Carolina 28211 and/or his custodian of records.

Dr. R. Brent Harrison, M.D., The University of Mississippi Medical Center, Department of Radiology, 2500 North State Street, Jackson, Mississippi 39216, (601) 984-2515. Dr. Harrison is a B Reader and may testify regarding the radiographs of the plaintiff and/or plaintiff's decedent.

Mr. Richard L. Hatfield, Law Engineering, Inc. 369 Plasters Avenue, Atlanta, Georgia 30324.

Dr. J. D. Havron, retired, South Pittsburgh, Tennessee and/or his custodian of records.

Willis Hazard, 3609 Mapleway Drive, Toledo, Ohio. Industrial hygiene and threshold limit value testimony, product testing, product and/or documentary testimony relevant to defense of plaintiff(s)' claims.

Mr. Richard L. Hatfield, Law Engineering, Inc., 369 Plasters Ave., Atlanta, Georgia 30324.

Dr. Gussie L. Hawkins, V. A. Medical Center, Chattanooga, Tennessee and/or his custodian of records.

Dr. Peter Heidbrink, Southwest Pulmonary Associates, St. Paul Professional Building #2, 5959 Harry Hines Boulevard, Suite 711, Dallas, Texas 75235. Dr. Heidbrink is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and

cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Michael D. Henderson, 330 Rittiman Road, San Antonio, Texas 78209. Dr. Henderson may testify concerning the relationship of asbestosis and smoking to the development of cancers. Dr. Henderson may also testify concerning the incidence of lung cancer among individuals with asbestos or exposure to asbestos-containing products. He may also testify regarding general pathology and the pathology of the plaintiff or plaintiff's decedent.

Michael D. Henderson, M.D., M.P.H., F.A.C.P., F.C.C.P., Internist and Oncologist, 2630 Point del Mar Avenue, Corona del Mar, California 92625-1551, telephone (714) 721-4122. Dr. Henderson may testify regarding the alleged connection between plaintiff's medical condition and his or her alleged asbestos exposure, the treatment of and prognosis for plaintiff's condition and issues of alternative causation.

Dr. D. J. Hennessi, 3280 Howell Mill Road, Ste. 123, Atlanta, Georgia 30327 and/or his custodian of records.

Dr. William C. Hicks, Zeigler Blvd., Mobile, Alabama and/or his custodian of records.

John Higginson, B.A., M.D., F.R.C.P., Department of Community & Family Medicine, 314 Kober-Cogan Hall, Georgetown University Medical Center, 3750 Reservoir Road, N.W., Washington, D.C. 20007. Dr. Higginson is expected to testify regarding the protocol, methodology, and analysis of cancer experimentation, custom and practice regarding peer review and the editing of scientific work; and medical knowledge regarding asbestos.

Dr. Hines, Chesnee, South Carolina, and/or his custodian of records.

Dr. Elliott Hinkes, 301 North Prairie Avenue, Suite 311, Inglewood, California 90301. Dr. Hinkes is a specialist in the area of oncology. Dr. Hinkes may testify as to all matters pertaining to study and research concerning exposure to asbestos and its effects on the human body; as to exposure to asbestos in regard to development of lung cancer, mesothelioma and other respiratory diseases; as to his examination and review of plaintiff's medical records, history, x-rays and pathology material; his expert opinion as to whether plaintiff suffers from a respiratory disease and cause of such disease, including but not limited to asbestosis, lung cancer, mesothelioma and the basis for such opinion; and all other matters concerning plaintiff's medical condition.

Dr. H. Corwin Hinshaw, Sr., Retired Emeritus Professor of Medicine, University of California, School of Medicine, P. O. Box 546, Belvedere, California 94920. Dr. Hinshaw may testify by deposition about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system.

Dr. Gerald H. Holman, 6010 Amarillo Boulevard West, Amarillo, Texas 79106 (806) 355-9703.

Dr. Edwin C. Holstein, Environmental Health Associates, P.A., 867 Boylston Street, Boston, Massachusetts 02116 (617) 266-1818.

Dr. Richard J. Horan, Marine Consulting, Inc., Marine Trade Center, Suite 203, P. O. Box 691, Portland, ME 04104.

Dr. Thomas Peter Howard, Osler Clinic of Medicine, Pulmonary Director, 930 South Harbor City Boulevard, Melbourne, FL. 32901. Dr. Howard may testify about matters pertaining to the diagnosis of asbestos-related disease generally and the diagnosis of the condition of plaintiffs. He may also testify about the state of the scientific and medical knowledge concerning asbestos.

Harold Robert Hoyle, by deposition, %Dow Chemical Company, Dow Chemical Building, Midland, Michigan. Will be offered by deposition given in No. B-126,986 Allen v. American Petrofina, to authenticate certain documents.

Dr. Janet Hughes, M.D., Tulane School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Hughes is a biostatistician with expertise in the areas of statistics and epidemiology. She is capable of testifying regarding the dose-response relationship between asbestos exposure and the occurrence of disease, the effect of low level exposure to

asbestos, the statistical methods of assessing risks, and other medical issues relating to lung disease and cancer.

William Hughson, M.D., Internist, Pulmonologist, Epidemiologist, Occupational Medicine specialist, 3969 Fourth Avenue, Suite 202, San Diego, CA 92103, (619) 294-6206. Dr. Hughson is board certified in internal medicine, pulmonology and occupational medicine and may testify regarding his knowledge of lungs and thoracic organ functions, the history of development of medical knowledge related to asbestos-related disease and occupational and epidemiological issues in relationship to asbestos exposure, issues of alternative causation and any increased risk of cancer and life shortening problems not related to alleged asbestos exposure, plaintiff's medical condition and prognosis.

Humana Hospital Brandon, Custodian of Records, 119 Oakfield Drive, Brandon, Florida 33511.

Huntsville Hospital East, Custodian of Records, Huntsville, Alabama.

Dr. Steven Ingram, 2325 N.W. Military, #111, San Antonio, Texas 78231 (210) 341-4448.

In Re: Asbestos Litigation, (depositions) C.A. No. 77C-ASB-32 (Superior Court of the State of Delaware, New Castle County) (Dec. 13, 1991).

In Re: Baltimore City Personal Injury and Wrongful Death Asbestos Cases and Abate, et al. v. ACandS, Inc., et al (depositions), Case No. 89236704 (Circuit Court for Baltimore City, Maryland) (March 22, 1991).

Hugh Jackson, (by deposition) 5205 Skytrail Street, Littleton, Co. 80123.

Dr. Joseph A. Jackson, III, 800 W. Cemetery Street, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. James (Retired), Charlotte, North Carolina and/or his custodian of records.

Dr. Rex L. Janes, V.A. Hospital, Murfreesboro, Tennessee, and/or his custodian of records.

Dr. Dala Joy Rookstool Jarolin, 12305 S. 14th Street, Jenks, Oklahoma 74037-4903. A pulmonary pathologist; based on his review of medical records, including pathology materials, he will testify about the plaintiff(s)' medical condition, and the cause of plaintiff(s)' medical condition. His testimony will also include a discussion of asbestos and its effect on human health generally and plaintiff(s)' specifically, and the effect that

other substances have on human health generally and plaintiff(s)' condition specifically.

Dr. Stephen Jenkinson, UT Health Science Center @San Antonio, 7703 Floyd Avenue Drive, San Antonio, Texas 78284-7885. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff(s) and the relationship, if any, to the plaintiff(s)' exposure to asbestos. He will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead and Gaensler.

Dr. Bill Johnson, 2948 Foxhall Circle, Augusta, Georgia 30907 (706) 863-4270.

Dr. Robert W. Johnson, 4970 El Camino Real, Ste. 250, Los Altos, California 94022 (415) 494-2413.

Dr. Robert Jones, Tulane Medical School, Pulmonary Diseases Section, 1700 Perdido Street, New Orleans, Louisiana 70112 (504) 588-5265. Dr. Jones is a specialist in the area of respiratory diseases. Dr. Jones may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Elliott Kagan, Georgetown Medical Center, Georgetown University, Department of Pathology, 4000 Reservoir Rd. N.W., Washington D.C. 20007 (202) 687-1345.

Dr. Steven Kalter, 7940 Floyd Curl #720, San Antonio, Texas 78229 (210) 614-3307.

Dr. Kelly, Carolinas Medical Center, Charlotte, North Carolina and/or his custodian of records.

Dr. R. Emmet Kelly, 665 South Skinker, St. Louis, Mo. 63105.

Dr. Gerald Kerby, M.D., Pulmonary Specialist, University of Kansas Medical Center, 3900 Cambridge, Kansas City, Kansas 66103. Dr. Kerby is a pulmonary disease specialist. He may testify to all matters pertaining to scientific knowledge, research and study of the effects of exposure to asbestos on the human body; to the latency periods of asbestos-related diseases; to the various types of asbestos fibers and their effects on the human body; to the effects of exposure to chrysotile fiber in regard to asbestos-related diseases; scientific criteria used to diagnose respiratory diseases, including but not limited to asbestosis, lung cancer, mesothelioma, to all matters pertaining

to the plaintiff's medical condition; to all state of the art issues.

Dr. Khuu, U.S.A. Stanton Road Clinic, 575 Stanton Road, Mobile, Alabama and/or his custodian of records.

Dr. Kaye Kilburn, USC School of Medicine, 2025 Zonal Avenue, Room 201, Los Angeles, California 90033 (213) 3342-1830.

Killian, et al. vs. Eagle-Picher Industries, Inc., et al
(depositions), Case No. 84325057, 84276045 (Circuit Court for Baltimore City, Maryland) (Dec. 16, 1988).

Dr. Mark Klepper, Pulmonary & Critical Care Consultants, 1305 West 34th Street, Suite 400, Austin, Texas 78705 (512) 453-4071.

Dr. Koger, Alvin C. York Veteran's Affairs Medical Center, 3400 Lebanon Road, Murfreesboro, Tennessee 37129 and/or his custodian of records.

Richard Samuel Kops, M.D., Pulmonologist, Internist; Diablo Pulmonary Medical Group, 2222 East Street, No. 300, Concord, California 94520 (510) 676-2942. Dr. Kops may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Rich Kradin, Massachusetts General Hospital, Box 5, 100 Blossom Street, Boston, Massachusetts 92114 (617) 726-5243.

Dr. Kraus, HCA Parkridge Medical Center, 2333 McCallie Avenue, Chattanooga, Tennessee 37404 and/or his custodian of records.

George M. Kraus, 11 Drake Lane, Upper Saddle River, New Jersey 07458 (201) 327-2105.

Dr. Richard S. Kuebler, 35 Breakers Lane, Ridgeland, Mississippi 39157 and/or his custodian of records.

Dr. Marvin Kushner, State University of New York at Stony Brook, Health Sciences Center, Basic Science Tower 9, Room 140, Stony Brook, NY 11794. General and asbestos-related pulmonary pathology and epidemiology relevant thereto. Cancer issues; e.g., cancer risk, carcinogenicity of worksite and environmental chemicals and substances, epidemiology. Medical testimony as to medical condition of specific plaintiffs as identified during on-going discovery.

Dr. James R. Kauten, 2001 Peachtree Road, Ste. 440, Atlanta, Georgia 30309 and/or his custodian of records.

Dr. Constancio Y. King, 3717 Farwell Drive, Amarillo, Texas 79109 (806) 353-3077.

Dr. Gary Kolb, 2101 Hand Avenue, Bay Minette, Alabama 36507 and/or his custodian of records.

Dr. Richard S. Kuebler, 35 Breakers Lane, Ridgeland, Mississippi 39157 and/or his custodian of records.

Dr. Marvin Kushner, Dept. of Pathology, School of Medicine, Health Sciences Center, State University of New York at Stony Brook, Stony Brook, NY 11794-8622.

Dr. Robert Lampert, Baylor College of Medicine, Department of Internal Medicine/Pulmonary Section, 6550 Fannin, Smith Tower, Suite 1220, Houston, Texas 77030. Dr. Lampert may testify to all matters pertaining to his examination of a plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Arthur Langer, Ph.D., Applied Sciences Institute, Brooklyn College - CUNY, Bedford Avenue & Avenue H, Brooklyn, New York (718) 951-4242. Dr. Langer will testify regarding: (a) asbestos and asbestos-containing products generally; (b) what occurs when asbestos-containing products are cut, sawed and handled; (c) the composition of asbestos-containing friction products and the dust levels created by such products; (d) the percentage and type of asbestos fibers contained in such products and the propensity of

such products to produce respirable asbestos fibers when cut, handled or otherwise disturbed, as well as to the dust found in brakes and wheels after braking; (e) specific tests performed on such products, the results of such tests, and whether recall of such products should have taken place; (f) the availability of materials as substitutes for asbestos; (g) the utility of asbestos-containing friction products and that such products are not unreasonably dangerous; and, (h) the knowledge of the scientific community of the above.

Jeffrey S. Lee, Building 512, University of Utah, Salt Lake City, Utah 84112. Dr. Lee may testify that the medical community became aware that insulators with prolonged, intense exposure might be at risk for asbestos-related diseases in the late 1960s or early 1970s.

Dr. Peter Lees, Baltimore, MD.

Dr. Richard A. Lemen, Public Health Service, Deputy Director, National Institute of Occupational Safety and Health, Centers for Disease Control, 1600 Clifton Road, N.W. Bldg. 1, Rm. 3007, MS/D35, Atlanta, Georgia 30333 (404) 639-3773.

David A. Levene, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Lester Levin, c/o Drexel University, Philadelphia, Pennsylvania.

Dr. Steven Levin, Department of Environmental Medicine, Mt. Sinai Medical School, One Gustave Levy Place, New York, New York (212) 241-7810.

Dr. Martin Lewis, Palms of Pasadena Hospital, 1501 Pasadena Avenue South, St. Petersburg, Florida (813) 341-7505.

Alvaro Lievano, P. O. Drawer T, East Point, Georgia 30344 and/or his custodian of records.

Alan Lifshay, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-1894. Dr. Lifshay may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. David Lilienfeld, Box 1057, Mt. Sinai School of Medicine, 1 Gustave Levy Place, New York, New York 10029-6574 (212) 241-4785.

Dr. Bruce Linsky, 701 Lloyd Nolan Parkway, Fairfield, Alabama and/or his custodian of records.

Lloyd Nolan Hospital and Emergency Room, Custodian of Records,
701 Lloyd Nolan Parkway, Fairfield, Alabama 35064.

Dr. Charles Lockard, 102 Mocksville Avenue, Salisbury, North
Carolina 28145 and/or his custodian of records.

Dr. James E. Lockey, M.D., M.S., 3848 Chimney Hill Drive,
Cincinnati, Ohio 45241. Dr. Lockey may testify about the state
of the scientific and medical knowledge concerning asbestos.
Included in his testimony will be discussion of the respiratory
system, asbestos-related disease, and the effect of other
substances on the respiratory system. Dr. Lockey may give
factual testimony concerning his knowledge of relevant facts as
well as express opinions within his field of knowledge.

Dr Daniel Lorch, 500 Vanderbeg Drive, Brandon, Florida 33511
and/or his custodian of records.

Dr. Cynthia Lorino, 6701 Airport Boulevard Ste. B-101, Mobile,
Alabama 36609 (334) 633-2704.

Dr. Gaeton D. Lorino, 6701 Airport Boulevard, Suite A-101,
Mobile, Alabama 36609 (334) 633-8880.

Courtland Lowe, 6300 Button Gwinett Drive, Atlanta, Georgia
30362.

Dr. Marisa Luna, Selma Pathology Laboratories, P. O. Box 1369,
Selma, Alabama 36702.

Donald T. Lunde, M.D., Psychiatrist; 900 Welch Road, Suite 400,
Palo Alto, California 94304, (415) 324-2226. Dr. Lunde may
testify regarding plaintiff's alleged emotional, mental and
psychiatric problems, if any.

Harry MacDannald, M.D., Pulmonologist; Respiratory Medical Group,
130 La Casa Via, Bldg. #2, Suite 208, Walnut Creek, California
94598, (510) 944-0166. Dr. MacDannald may testify regarding his
knowledge of lungs and thoracic organ functions, plaintiff's
medical condition and prognosis, issues of causation and life
shortening problems not related to alleged asbestos exposure.

Dr. Thomas Mancuso, 5127 Elsworth, Pittsburgh, Pennsylvania (412)
683-6321.

Dr. Richard Manus (Retired), 1680 Mulkey Road, Ste. C, Austell,
Georgia 30001 and/or his custodian of records.

Dr. Eugene Mark, Massachusetts General Hospital, Department of
Pathology, 32 Fruit Street, Warren II, Boston, Massachusetts
(617) 726-8891.

Dr. Charles David Markle, 1605 Mulkey Road, Austell, Georgia 30001 and/or his custodian of records.

Dr. Gerald E. Markowitz, 160 West 97th Street, New York, New York 10025 (212) 237-8458.

Dr. David M. Martin, South Fulton Medical Center, 1136 Cleveland Avenue, Suite 608, East Point, Georgia 30344 and/or his custodian of records.

Dr. James G. Matrisciano, 207 Highland Park Plaza, Covington, La. 70433, (504) 892-6904.

Dr. Jack Mauldin, 817 Princeton Avenue, S.W., Ste. 302, Birmingham, Alabama 35211 and/or his custodian of records.

Daniel May, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Dr. Frank Mazza, Pulmonary & Critical Care Consultants, 1305 West 34th Street, Ste. 400, Austin, Texas 78705 (512) 453-4071.

Mr. John D. McAllister, deceased (by deposition).

William McCaig, Simpsonville, South Carolina.

Dr. Caroline McCall, University of Alabama Hospital, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4979.

John D. McCann, 195 Bouffard, LaSalle, Ontario, British Columbia N9J1E9 (519) 734-7889.

Dr. Ben McCubbins, 611 Mocksville Avenue, Salisbury, North Carolina and/or his custodian of records.

Charles McDonald, M.D., Pulmonologist, Internist; Pacific Presbyterian Hospital, 2100 Webster Street, Suite 411, San Francisco, California 94115, (415) 749-5779. Dr. McDonald may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Forde A. McIver, Pathology Associates, P.A., 135 Rutledge Avenue, Charleston, South Carolina 29401. Dr. McIver may testify about the state of the scientific and medical art concerning the potential hazards of asbestos.

Marion McManus, Tecon Services, Inc. 515 Garden Oaks Blvd., Houston, Tx. 77018 (713) 691-2700. Will testify to matters concerning the insulation contracting business, including work practices, product usage and labeling. Utilization of videotaped

deposition testimony taken on December 15, 1992 in the Emanuel Rollins' group filed in the 234th Judicial District Court of Harris County, Texas.

Mecklenburg Cardiovascular, Custodian of Records, 1718 E. 4th Street, Ste. 501, Charlotte, North Carolina 28204.

Mecklenberg Neurological, Custodian of Records, Charlotte, North Carolina.

Medical Center Hospital, Custodian of Records, 911 Big Cove Road, S.E., Huntsville, Alabama 35801.

Members of the ACGIH TLV Committee from 1946 to the present.

Memorial Hospital Northwest, Custodian of Records, 1635 North Loop West, Houston, Texas 77005

Metropolitan Hospital, custodian of records, 3223 Howell Mill Road, N.W., Atlanta, Georgia.

Gerald Meyers, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-1894. Dr. Meyers may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Mid-Carolina Consultants, Custodian of Records, Charlotte, North Carolina.

Dr. Joseph M. Miller, RFD 2, Box 245A, Plymouth, NH 03264 (603) 536-3732. Dr. Miller may testify about the state of the scientific and medical knowledge concerning asbestos. Included in his testimony will be discussion of the respiratory system, asbestos-related diseases, and the effect of other substances on the respiratory system.

Dr. Devi P. Misra, 333 Whiteport Drive, Ste. 205, Huntsville, Alabama 35801 and/or his custodian of records.

Mobile Infirmary Medical Center, Custodian of Records, Box 2144, Mobile, Alabama 36652.

Dr. J. Steven Moore, M.D., M.P.H., C.I.H., Associate Professor, Department of Occupational and Environmental Medicine, University of Texas Health Center at Tyler, P. O. Box 2003, Hwy. 271 at Hwy. 155, Tyler, Tx. 75710-2003. Will testify on matters relating to industrial hygiene and occupational medicine.

Dr. Michael Moore, P. O. Box 747, Bessemer, Alabama 35021, and/or his custodian of records.

Dr. Robert W. Morgan, Occupational Medicine, One Lagoon Drive, Suite 145, Redwood City, Ca 94065, (415) 637-0723 may be called to testify on the epidemiological and occupational health issues related to the cause of plaintiff's/decedent's disease, issues of alternative cause and life shortening problems not related to alleged asbestos exposure.

Dr. William K.C. Morgan, University Hospital, University of Western Ontario, P. O. Box 5339, Postal Station A, London, Ontario N6A A5. Dr. Morgan is a Professor of Medicine and Director of Chest Diseases Services at the University of Western Ontario. He was educated in England and Scotland, and among other appointments, is a member of the Advisory Board for Occupational Health & Safety Resource Center at the University of Western Ontario. He has knowledge of the pathology, diagnosis, testing and causation of pulmonary and related disease, including mesothelioma, lung cancer and asbestosis. He may testify about the state of the medical art as it relates to knowledge of health hazards associated with exposure to asbestos dust, based on his review of asbestos-related literature and his own experience. He may testify about the plaintiff's medical condition. Dr. Morgan may give factual testimony concerning his knowledge of relevant facts as well as express opinions within his field of knowledge.

Dr. R. C. Morley, 115 Manning Drive, S.W., Ste. A101, Huntsville, Alabama 35801 and/or his custodian of records.

Dr. Stephen Morris, 20 Linden Avenue, N.E., Box 37, Atlanta, Georgia 30365, and/or his custodian of records.

Norman Moscow, M.D., Radiologist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-0337. Dr. Moscow may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Dr. Samuel Moyle, Jr., P. O. Box 539, Wallhala, South Carolina 29691 and/or his custodian of records.

Arthur P. Mueller. Will testify by deposition dated February 13, 1985 (videotape) or March 17, 1987 (videotape). Mr. Mueller was with Philip Carey in Research and Development. His testimony relates to the operations of Philip Carey and Philip Carey products and Philip Carey or Celotex documents.

Dr. David F. Musto, Yale University, 333 Cedar Street, New Haven, CT 06510-8009. Dr. Musto is expected to testify on matters relating to medicine and the history of medicine.

Dr. Gerald L. Myers, M.D., Alta Bates Hospital, 3001 Colby Plaza at Ashby, Room 2737, Berkeley, CA 94705. Dr. Myers is a Board Certified pulmonary physician and NIOSH Certified "B" Reader. Dr. Myers may testify about the effects of pleural changes on

lung function, the progression of asbestos-related lung disease, the risks of lung cancer in asbestos-exposed individuals with and without asbestosis, and the risk of cancers other than lung cancer and mesothelioma among asbestos-exposed individuals.

Nalle Clinic, Custodian of Records, Charlotte, North Carolina.

Mark Nathan, M.D., Cardiologist, Internist; Cardiac Consultants, 917 San Ramon Valley Blvd., Danville, California 94526, (510) 831-1600. Dr. Nathan may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

National Museum of Health and Medicine, Custodian of Records, Armed Forces Institute of Pathology, Walter Reed Army Medical Center, Washington D.C. 20306-6000.

Dr. Richard Nau, 1606 East Kessler, Longview, Washington 98632, (360) 425-5620.

Dr. Karim Nawaz, 1901 Medi Park Drive., Suite 1049, Amarillo, Texas 79106, (806) 355-9248.

Charles B. Neckman, 1151 Cleveland Ave., Ste. D, East Point, Georgia 30344 and/or his custodian of records.

Kenneth Nelson (by deposition), 1894 Millcreek Way, Salt Lake City, Utah 84106.

Neurological Associates, Custodian of Records, East Point, Georgia.

Dr. Gary Newsom, 1607 West Loop 289, Lubbock, Texas 79416 (806) 799-2991.

Dr. Brian Norkiewicz, 3237 91st Street, Lubbock, Texas 79423 (806) 795-5214.

North Jackson Hospital, Custodian of Records, Rt. 1, Box 88, Bridgeport, Alabama 37540.

Dr. Phyllis J. Noss, 4511 Fairway Avenue, Dallas, Texas 75219 (214) 522-0810.

Dr. Onyeso Nwachuka, V.A. Medical Center, Murfreesboro, Tennessee and/or his custodian of records.

Dr. Alton Ochsner, Deceased, Ochsner Clinic, New Orleans, La. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions.

Dr. L. Christine Oliver, Pulmonary and Critical Care Unit,
Massachusetts General Hospital, Boston, Massachusetts 02114 (617)
726-1721.

Dr. Elise Olsen, Duke University Medical Center, Durham, North
Carolina 27710, and/or her custodian of records.

Dr. George A. Omura, 720 20th Street South, Birmingham, Alabama
35294 (205) 934-3204.

Dr. Robert O'Neal, M.D., The University of Mississippi Medical
Center, 2500 North State Street; Jackson, Mississippi 39216-4505.
Dr. O'Neal is a pathologist. He may testify to all matters
pertaining to study and research concerning exposure to asbestos
and its effects on the human body; to the exposure to asbestos
and the development of lung cancer, mesothelioma and other
respiratory diseases; to his examination and review of
plaintiff's medical records, history, x-rays, and pathology
material; his expert opinion to whether plaintiff suffers from a
respiratory disease and the cause of such disease, including but
not limited to asbestosis, lung cancer, mesothelioma and the
basis for such opinion; to all matters pertaining to the
plaintiff's medical condition; to all state of the art issues.

Dr. Raymond Osarogiagbon, Texas Tech University Health Science
Center, Department of Internal Medicine, Amarillo, Texas 79106
(806) 742-2011.

Dr. David Ozonoff, Boston University, School of Public Health,
Bldg. A-501, 80 E. Concorde St., Boston, Massachusetts 02118
(617) 638-4620.

Dr. David L. Page, Vanderbilt University Medical School, 1211
22nd Avenue south, Room C-3311, Medical Center North, Nashville,
TN 37232. General and asbestos-related pulmonary pathology and
epidemiology relevant thereto. Cancer issues; e.g., cancer risk,
carcinogenicity of worksite and environmental chemicals and
substances, epidemiology. Medical testimony as to medical
condition of specific plaintiffs, as identified during on-going
discovery.

Dr. Keith Parmer, 1013 North Fifth Avenue, Rome, Georgia 30161
and/or his custodian of records.

Dr. Frank Parrott, P. O. Box 637, Salisbury, North Carolina
28144 and/or his custodian of records.

Dr. Pausa (deceased), Custodian of Records, Austell, Georgia
30059.

Walter Payment, Greenville, South Carolina.

Lewis Pechstein. Will testify by deposition; was employed at Philip Carey Manufacturing Company and its successors; testimony relates to the corporate history of Philip Carey, the operations of Philip Carey, Philip Carey products, and Philip Carey or Celotex documents.

Robert E. Peele, 232 Shawnee Estates, Nitro, W. Va. Product testing, industrial hygiene and threshold limit value testimony relevant to defenses of plaintiff(s)' claims.

Dr. William D. Perkins, 701 East Marshall, Suite 300, Longview, Texas 75601 (903) 236-2730.

Dr. Edward Peters, Brookline, MA.

Glen Petersen, M.D., Pulmonologist, Internist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 845-7968. Dr. Petersen may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Jack E. Peterson, 2830 Via Viejas Oeste, Alpine, Ca. 91901. Industrial hygiene issues, including threshold limit values. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions. May also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, may also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Piedmont Hospital, Custodian of Records, 1968 Peachtree Road Northwest, Atlanta, Georgia 30309.

Dr. Stanley Pier, 30240 - 27th Avenue South, Federal Way, Washington 98003 (206) 941-3819. Dr. Pier is a toxicologist who may testify concerning state of the art of asbestos.

Dr. Nanette B. Pinkard, University of Alabama Hospital, Department of Pathology, 619 South 19th Street, Birmingham, Alabama 35233, (205) 934-4977.

Dr. A. Mitchell Polinsky, Stanford University, Professor of Law and Economics, Crown Quadrangle, Stanford, California 94306-8610. Dr. Polinsky is an expert who may testify about the inappropriateness of punitive damages in this and similar cases based upon research he and others have conducted.

Dr. Doris Pollack, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Charles Powell, Cohrssen Environmental, 2970 Pine Street, San Francisco, Ca. 94115. Industrial hygiene and threshold limit value testimony, product testing, emissions, development of knowledge regarding asbestos exposure, product and/or documentary testimony relevant to the defense of plaintiff(s)' claims.

Dr. Philip C. Pratt. A pathologist who will testify by deposition transcripts dated June 21, 1988, July 12, 1988, and December 13, 1991, with respect to his personal knowledge and observations involving studies conducted at the Saranac Laboratories.

Leslie Preger, M.D., Radiologist, Peninsula Diagnostic Services, Ltd., 1875 Trousdale Drive, Suite A, Burlingame, CA 94010, (415) 697-7006. Dr. Preger may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Presbyterian Hospital, Custodian of Records, 200 Hawthorne Lane, Charlotte, North Carolina 28204.

Princeton Baptist Medical Center, Custodian of Records, 701 Princeton Avenue S.W., Birmingham, Alabama 35211.

Samuel Travis Pritchett, Ph.D., University of South Carolina, Columbia, SC 29208. Dr. Pritchett is a Professor of Finance and Insurance at the College of Business Administration of the University of South Carolina. He is a chartered life underwriter, chartered property and casualty underwriter, and chartered financial consultant.

Dr. James Pugh, 1900 Randolph Road, Suite 1010, Charlotte, North Carolina 28207, and/or his custodian of records.

Pulmonary Associates, Custodian of Records, Brandon, Florida.

Dr. Robert Quinn, 25 Lake Concord Road, Concord, North Carolina and/or his custodian of records.

Dr. David Raben, Veterans Affairs Medical Center, 700 South 19th Street, Birmingham, Alabama 35233, (205) 933-8101.

Dr. Radford, Cliffside, North Carolina 28024 and/or his custodian of records.

Dr. Richard Rankin, 105 Oakland Avenue, Mt. Holly, North Carolina 28120, and/or his custodian of records.

Dr. D. A. Rao, Lamier Memorial Hospital, 4800 48th Street, Valley, Alabama 36854, (334) 756-3111.

Dr. Elizabeth Rareshide, 3623 Audubon Terrace, Jefferson, La.
70121 (504) 464-8626.

Dr. Charles Ray, 1605 Mulkey Road, Austell, Georgia 30001,
and/or his custodian of records.

Redmond Park Hospital and Regional Medical Center, Custodian of
Records, 501 Redmond Road, Rome, Georgia 30165.

Dr. Richard J. Reed, Pathology Department, 1405 Foucher Street,
New Orleans, La. 70115 (504) 897-8754.

Dr. James Reynolds (retired), W. Henderson Street, Salisbury,
North Carolina 28144 and/or his custodian of records.

Dr. David L. Ring, Good Shepherd Medical Center, Longview, Texas
75601 (903) 236-2000.

Dr. James Robb, Cedars Medical Center, 1400 N.W. Avenue, Miami,
Florida 33136 (305) 325-5587.

Dr. Robertson, 909 W. Henderson Street, Salisbury, North Carolina
28145 and/or his custodian of records.

Dr. Leonard Robinson, University of Alabama Hospital, 619 South
19th Street, Birmingham, Alabama 35233, (205) 934-4979.

Dr. A. Rodriguez, 285 Boulevard N.E., Atlanta, Georgia 30312
and/or his custodian of records.

Dr. Jay Rodriguez, 1100 Holly Avenue, South Pittsburg, Tennessee
37380 and/or his custodian of records.

Dr. Victor L. Roggli, Duke University Medical Center, Box 3712,
Durham, NC 27710. Dr. Roggli is a pathologist who has authored
publications in the area of asbestos-associated disease. He is
capable of testifying regarding lung burden and the level of
asbestos burden which is necessary to cause disease. He is
further capable of testifying regarding non-asbestos induced
mesothelioma, different types of asbestos fibers and their effect
on human lungs, dose-response relationships and the occurrence of
disease, the anatomy of the lung, and other medical issues
relating to asbestos disease, cancer, and mesothelioma. Dr.
Roggli's testimony will be based upon his education, experience,
and the literature in his fields of expertise.

Arthur N. Rohl, Ph.D., 10 Stouts Valley Road, Easton,
Pennsylvania 18042.

Dr. Ronald Rosen, 1620 Mulkey Road, Austell, Georgia 30001 and/or
his custodian of records.

Dr. Arnold M. Rosenberg, Columbia, MD.

Dr. Robert M. Ross, Pulmonary Diseases, 17030 Nanes Drive, Suite 214, Houston, Texas 77090. 713-440-8851. A specialist in the area of respiratory diseases. Will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff(s)' medical records, any communications with the plaintiff(s) or plaintiff(s)' family(ies), review of x-rays of the plaintiff(s), the diagnostic criteria used to diagnose asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff(s)' current medical condition, his prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Ross will also testify about the general medical issues, with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff(s) specifically. Dr. Ross will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos. Dr. Ross will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby. Dr. Ross may also testify regarding the medical conditions of each plaintiff, based on review of medical records, x-rays, plaintiff(s)' expert reports and supplemental reports.

Rowan Memorial Hospital, Custodian of Records, 612 Mocksville Avenue, Salisbury, North Carolina 28145.

Dr. Emanuel Rubin, Jefferson medical College, 1020 Locust Street, Suite 279, Philadelphia, Pa. 19107-6799. Dr. Rubin is expected to testify regarding the protocol, methodology, and analysis of cancer research and the protocol and practice regarding the process of editing and peer review of scientific research manuscripts. Dr. Rubin is also expected to testify on matters relating to industrial hygiene.

Dr. Joy Russell, Highway 11 South, Birmingham, Alabama 35021.

Dr. Charles Rutherford, Jr., 3715 Dauphin Street, Mobile, Alabama 36606 and/or his custodian of records.

David S. Safianoff, M.D., Pulmonologist, Internist; Diablo Pulmonary Medical Group, 2222 East Street, No. 300, Concord, California 94520 (510) 676-2942. Dr. Safianoff may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

William K. Salyer, M.D., Pathologist; Alta Bates Hospital, 2450 Ashby Avenue, Berkeley, California 94705, (510) 540-0337. Dr. Salyer may testify regarding pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Robert Samuels, New York, New York.

E. Nicholas Sargent, M.D., Radiologist; 121 Sotoyome Street, Santa Rosa, California 95405 (707) 546-4062. Dr. Sargent may testify regarding radiographic evidence of plaintiff's medical condition.

Mr. John Sartain, Consulting Economist, Sartain & Company, 3811 Turtle Creek Centre, Suite 760, Dallas, Texas 75219. Mr. Sartain is an economic consultant and may testify regarding the economic loss incurred by the death of a plaintiff.

With respect to particular plaintiffs, he may testify as to review and interpretation of x-ray films, medical records, review and interpretation of pulmonary function testing, the nature and extent of any impairment or disability, whether the condition is progressive and whether other diseases or conditions are present in plaintiff. Dr. Sawyer's testimony will be based on his training, experience, education and review of the medical literature concerning asbestos-related disease.

Mr. Frank Scanland, 11390 Idaho, South Gate, California 90280. Mr. Scanland was employed by The Synkoloid Company for a period of time and is knowledgeable about the products this defendant manufactured and distributed, their asbestos content, if any, and the procedures for preparing and applying this defendant's products.

E. Lynn Schall, 510 Edgewood Drive, Collingswood, New Jersey 08108 (609) 858-0003 or (609) 967-3313.

Dr. Gerritt Schepers, 6527 Sunnyhill Court, McClean, Virginia (703) 790-8616 (Fax).

Dr. Norberto A. Schor, 1430 Tulane Avenue, New Orleans, La. 70112 (504) 588-5224.

Dr. William J. Schulte, 110 N. Lafayette Street, Mobile, Alabama 36604 and/or his custodian of records.

Dr. George F. Scofield, Cunningham Pathology Associates, 1801 1st Avenue South, Birmingham, Alabama 35233 (205) 58-3648.

Philip Scordino v. Owens-Corning Fiberglas Corp., et al.
(depositions), C.A. No. 89-5139(3) and Dwight Copeland v.

Metropolitan Life Ins. Co., et al. (depositions), C.A. No. 89-5142(3) (Circuit Court of Jackson County, Ms.) (Feb. 22, 1991).

Dr. Jay T. Segarra, 414 Ward Avenue, Ocean Springs, Mississippi 39564 (601) 875-2954.

Mr. Alan M. Segrave, Materials Analytical Services, Inc., 3597 Parkway Lane, Suite 250, Norcross, Georgia 30092 (404) 448-3200.

Dr. Irving J. Selikoff, dec., Mount Sinai School of Medicine, 1 Gustave Levy Plaza, New York, New York. Dr. Selikoff will testify by deposition taken in Rogers v. Johns-Manville, February 19, 1971, regarding the relationship between asbestos and disease, knowledge concerning same, state-of-the art, and all topics reflected in defendants' deposition designations.

Roger Shack, P. O. Box 356, Montevallo, Alabama 25115.

Dr. Ishfaq Hussain Shah, 371 6th Street, Gaffney, South Carolina 29340 and/or his custodian of records.

Dr. David Shanks, 1928 Randolph Road, Suite 106, Charlotte, North Carolina 28207 and/or his custodian o records.

Khalil Sheibani, M.D., Pathologist; Western Medical Center, 1001 N. Tustin Ave., Santa Anna, California 92705, (714) 953-3380. Dr. Sheibani may testify regarding pathological aspects of the case, plaintiff's medical condition, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. James Robert Shepherd, III, University of Texas Health Center at Tyler, Department of Radiology, P. O. Box 2003, Tyler, Texas, 75710. Dr. Shepherd is a specialist in the area of radiology. He may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof.

Dr. Russell Sherwin, 2011 Zonal Avenue HMR-201, Los Angeles, Ca. 90033. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff(s)' exposure to asbestos. Dr. Sherwin will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaenslerd and Kerby.

Dr. Allan Shulkin, Medical City Dallas Hospital, 7777 Forest Lane, Suite 202, Dallas, texas, 75230 (214) 934-1593. Dr.

Shulkin is a specialist in the area of respiratory disease. Dr. Shulkin may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis; his opinion as to whether plaintiff suffers from asbestos related disease and the basis for such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition.

Dr. Dorsett D. Smith, 4310 Colby, Suite 201, Everett, Washington 98203. Historical review and state-of-the art pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto. Cancer issues; e.g. cancer risk, carcinogenicity of workshop and environmental chemicals and substances, epidemiology. May also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Dr. James Garland Smith, Jr., Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P. O. Box 33932, Shreveport, La. 71130-3932. A specialist in the area of respiratory diseases. Dr. Smith will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff(s)' medical records, any communications with the plaintiff(s) or plaintiff(s)' family(ies), review of x-rays of the plaintiff(s), the diagnostic criteria used to diagnose asbestos-related diseases; his opinion as to whether plaintiff(s) suffers from asbestos-related disease and the basis of such opinion; the plaintiff(s)' current medical condition, his prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Smith will also testify about the general medical issues, with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff(s) specifically. Dr. Smith will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. Kenneth Wallace Smith, deceased (by deposition).

Marshall Smith, et al. and consolidated cases v. Johns-Manville Corp., et al. and Third-Party Actions (depositions), Civil Action Nos. 77-2047, 79-9, 79-1992, 79-2680, 79-2218, 79-3056, 80-179, 80-264 (U. S. District Court, District of New Jersey) (Mar. 22, 1983 and June 13, 1984).

Ralph G. Smith, 27411 Tudor Lane, Franklin, MI 48025.

Wesley D. Snowden, P.E., Bellevue, Wa.

South Fulton Medical Center, Custodian of Records, 1170 Cleveland Avenue, East Point, Georgia 30344.

South Pittsburg Hospital, Custodian of Records, P. O. Box 349, South Pittsburg, Tennessee 37380.

South Point Family Practice, Custodian of Records, 212 Glenway Street, Belmont, North Carolina 28012.

Dr. Selwyn Spangenthal, 1350 S. Kings Drive, Charlotte, North Carolina 28207, and/or his custodian of records.

Spartanburg Regional Hospital, Custodian of Records, 101 E. Wood Street, Spartanburg, South Carolina 29303.

Dr. Jerry Spencer, P. O. Box 6889, Lubbock, Texas 79493-6889 (806) 763-3311.

Dr. Susan Springer, Presbyterian Hospital, Charlotte, North Carolina 27207 and/or her custodian of records.

Springhill Memorial Hospital, Custodian of Records, Box 8246, Mobile, Alabama 36608.

St. Joseph's Hospital, Custodian of Records, 5665 Peachtree, Dunwood Road N.E., Atlanta, Georgia 30342-1701.

St. Joseph's Hospital, Custodian of Records, P. O. Box 4227, Tampa, Florida 33677.

Dr. Jessie Steinfield may testify concerning government warnings, smoking, and some areas of state-of-the art.

Roy Steinfurth, Room 505, Machinist Building, 1300 Connecticut Avenue, N.W., Washington, D.C. Authentication of asbestos workers magazine, publication and distribution, safety information and meetings and union activities.

Dr. R. D. Stephenson, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Dr. Paul M. Stevens, Professor of Medicine, Baylor College of Medicine, Methodist hospital, Houston, Texas 77030. Dr. Stevens is a specialist in the area of respiratory diseases. Dr. Stevens may testify as to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; the diagnostic criteria used to diagnose asbestosis;

his opinion as to whether plaintiff suffers from asbestos related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis in regard to the plaintiff's medical condition; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the syptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Randy Stewart, P. O. Box 8447, Amarillo, Texas 79114.

Dr. Walter Stewart, Baltimore, Md.

Dr. Gail Stockman, 701 East Marshall, Suite 502, Longview, Texas 75601, (903) 753-0787. Dr. Stockman is a specialist in the area of respiratory diseases. Will testify as to all matters pertaining to her examination of the plaintiff(s) and plaintiff(s)' medical records; any communication with the plaintiff(s) or plaintiff(s)' family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s)' suffers from asbestos related disease and the basis of such opinion; the plaintiff(s); current medical condition; her prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Stockman will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Stockman will also testify concerning those areas described for witnesses Demopoulos, Weill, Craighead, Gaensler and Kerby. State of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiff(s). Epidemiology and general medicine regarding asbestos exposure. May also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease

mesothelioma. In doing so, will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a base for opinion, will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan, and Lampshear, among others.

Herbert E. Stokinger, 9 Twin Hills Ridge Drive, Cincinnati, OH 45228.

Allen Stringer, Libby, MT.

Michael S. Stulbarg, M.D., Pulmonologist, Internist; University of California Medical Center, room M-1093 505 Parnassus Avenue, San Francisco, California 94122, (415) 476-1596. Professor of Clinical Medicine and Director of Clinical Pulmonary Science, Moffitt Hospital. Dr. Stulbarg may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Vijay Subbarao, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Surgical Associates, Custodian of Records, Atlanta, Georgia.

Dr. Richard C. Tannen, 8 Medical Parkway, Ste. 201, Dallas, Texas 75234 (214) 243-8363.

Mitchell Tarkoff, M.D., Pulmonologist, Internist; 350 - 30th Street, Suite 526, Oakland, California 94609, (510) 451-6026. Dr. Tarkoff may testify regarding his knowledge of lungs and thoracic organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Robert Taylor, Section of Pulmonary & Critical Care Medicine, Department of Medicine, LSU School of Medicine, P. O. Box 33932, Shreveport, La. 71130-3932. Dr. Taylor is a specialist in the area of respiratory diseases. Will testify as to all matters pertaining to his examination of the plaintiff(s) and plaintiff(s)' medical records; any communication with the plaintiff(s) or plaintiff(s)' family; review of x-rays of the plaintiff(s); the diagnostic criteria used to diagnose asbestos related diseases; her opinion as to whether plaintiff(s)' suffers from asbestos related disease and the basis of such opinion; the plaintiff(s); current medical condition; her prognosis in regard to the plaintiff(s)' medical condition and/or plaintiff(s)' cause of death. Dr. Taylor will also testify about the general medical issues with emphasis on the respiratory system and the effect that asbestos and other substances have on human health generally and with respect to plaintiff specifically. Dr. Taylor

will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Dr. D. T. Thomas, 1609 Drayton Street, Gastonia, North Carolina 28056 and/or his custodian of records.

Duncan Thomas, Ph.D., Epidemiologist, USC School of Medicine, Department of Preventive Medicine, 2025 Zonal Avenue, Los Angeles, Ca 90033 (213) 224-7434. Dr. Thomas may be called to testify regarding his knowledge of and the history of epidemiological principles in relation to asbestos exposure and smoking and any increased risk of cancer and life shortening problems. He may also testify by deposition transcript and trial transcript.

Dr. E. Mauricer Thomason (retired), Houston, Texas and/or his custodian of records.

Dr. Evaline J. Thompson, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Dr. G. Richard Thompson, Box 1203, Clemson, South Carolina 29633 (803) 656-0946.

Dr. W. R. Thompson, Jr., 102 Mocksville Avenue, Salisbury, North Carolina 28145 and/or his custodian of records.

Dr. Mark Thorson, 748 14th Avenue, Longview, Washington 98632, (206) 636-0040.

Dr. Arthur Judson Tillinghast, Schumpert Medical Center, 850 Olive Street, Suite A, Shreveport, La. 71104 (318) 222-3662. Will testify concerning his examination and diagnosis of the physical condition of the particular plaintiff and the relationship, if any, to the plaintiff's exposure to asbestos. Will also testify concerning those areas described for witnesses Demopoulos, Hinshaw, Weill, Craighead, Gaensler and Kerby.

Joseph Timmons, Sr., Travelers Rest, South Carolina.

Dr. Morris B. Trowtato, Atlanta, Georgia and/or his custodian of records.

Trudeau Foundation, Custodian of Records, Alogquin Avenue, Saranac Lake, New York.

Dr. Bruce A. Tucker, 833 Princeton Avenue, S.W. Birmingham, Alabama 35211 and/or his custodian of records.

Reverend Louis Turner, 406 Pine Tree Drive, Salisbury, North Carolina 28144 (704) 636-9558.

Vernon Turner, 20007 Highway 216, Vance, Alabama.

Arthur Typermass, Metropolitan Life Ins. Co., One Madison Avenue,
New York, NY 10010.

University of Alabama Hospital, Custodian of Records, 619 S. 19th
Street, Birmingham, Alabama 35233.

Upstate Carolina Medical Center, Custodian of Records, 1530 N.
Limestone Street, Gaffney, South Carolina 29340.

U.S.A. Clinic Physicians, 2451 Fillingim Street, Mobile, Alabama
36617 and/or their custodian of records.

U.S.A. Stanton Road Clinic, Custodian of Records, 575 Stanton
Road, Mobile, Alabama.

Dr. Joe Utly, 100 Wood Street, Spartanburg, South Carolina and/or
his custodian of records.

Kenneth J. Vandavelde, Associate Dean of the Western State
University Law School, San Diego, California (619) 297-9700.
Will testify concerning whether equal treaty rights exist between
Canada and the United States of America and related issues.

Veteran's Administration Clinic Physicians, 6200 East Gate
Shopping Center, Chattanooga, Tennessee and/or their custodian of
records.

Veteran's Affairs Medical Center, Custodian of Records, 1310 24th
Avenue, Nashville, Tennessee 27212.

Veteran's Affairs Medical Center, Custodian of Records,
Chattanooga, Tennessee.

Veteran's Affairs Medical Center, Custodian of Records,
Murfreesboro, Tennessee.

Rodney Vining, Cambridge, MA.

Dr. Mitchell S. Wachtel, VA Medical Center, 3710 S.W. U.S.
Veterans Road, Portland, Oregon 97201, (503) 220-8262.

Dr. J. C. Wagner, MRC External Staff, Tea Occupation Lung
Disease, Llandough Hospital, Penarty, Glamorgan, CF6-1XW, UK.
Dr. Wagner may give factual testimony concerning his knowledge of
relevant facts as well as express opinions within his field of
knowledge.

Dr. Joseph K. Wagoner (by deposition).

Richard S. Walsh, Metropolitan Life Ins. Co., One Madison Avenue, New York, NY 10010.

Robert Walsh, Cambridge, MA.

Charles A. Webster, M.D., F.A.C.C., Cardiologist, Consultative Cardiology, 3300 Webster Street, Suite 710, Oakland, California 94609, (510) 832-4402. Dr. Webster may testify regarding his knowledge of cardiovascular organ functions, plaintiff's medical condition and prognosis, issues of alternative causation and life shortening problems not related to alleged asbestos exposure.

Dr. Hans Weill, Tulane University, School of Medicine, 1700 Perdido Street, New Orleans, Louisiana 70112. Dr. Weill is a pulmonary disease specialist. Dr. Weill may testify as to all matters pertaining to scientific knowledge, research and study in regards to exposure to asbestos and its effects on the human body; as to the latency periods of asbestos related diseases; as to the various types of asbestos fibers and their effects on the human body; as to the effects of exposure to the chrysotile fiber in regard to asbestos related diseases; scientific criteria used to diagnose respiratory disease, including but not limited to asbestosis, lung cancer, mesothelioma; as to all matters pertaining to the plaintiff's medical condition; as to all state of the art issues.

Paul Weiner, 667 Madison, New York, New York 10021 (212) 739-9400. Mr. Weiner is Sr. Vice President of Rapid; may testify regarding Rapid's financial worth, its business operations, corporate history, the fact that Rapid has never manufactured asbestos-containing products, the impact of asbestos-related litigation on Rapid, facts supporting Rapid's denial of liability for punitive damages, the defenses asserted by Rapid, and other facts relating to Rapid.

Dr. Frank Weir, 8131 Wycomb Drive, Houston, Texas 77070 (713) 995-7532. Dr. Weir is an industrial hygienist who may testify concerning state of the art as it relates to asbestos.

Dr. Weir has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant

asbestos; (f) the effects of wear and the occupational environment of workers in which these products are used; (g) federal laws and regulations governing asbestos exposure; (h) threshold limit values and time-weighted averages; (i) characteristics and epidemiology of asbestos-related diseases; (j) relevant medical and scientific literature on these subjects; (k) the concepts of toxicity and hazard, including discussion of the human body's natural defense system; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Elizabeth Weisburger, Ph.D., 5309 McKinley Street, Bethesda, MD. 20814. Dr. Weisburger will testify regarding the protocol, methodology and analysis of cancer research and the protocol and practice regarding the process of editing and peer review of scientific research manuscripts.

J. S. Weiss, M.D., Toxicologist, Occupational Medicine Specialist, Pathologist and Disability Evaluation Physician; 2120 Carlton Street, Berkeley, California 94704 (510) 849-4237. Dr. Weiss is a specialist in medical toxicology, occupational medicine, pathology and disability evaluation. Dr. Weiss may testify about toxicology and pathology as pertains to alleged asbestos-related diseases in general and plaintiff's medical condition in particular. Dr. Weiss may also testify about occupational medicine and disability evaluation as it pertains to plaintiff's condition and issues of alternative causation.

Noel Weiss, M.D., Epidemiologist; University of Washington, SC36, Health Sciences Building, Room F263-D, Seattle, Washington 98195. (206) 685-1788. Dr. Weiss may testify as to epidemiological issues related to plaintiff's physical condition, the relationship between asbestos exposure and any increased risk of cancer, medical causation and life shortening problems not related to alleged asbestos exposure. Dr. Weiss may also testify as to the state of the art based on his review of the medical literature. His area of expertise is epidemiology and biostatistics with emphasis on the study of cancer.

Dr. William Weiss, Hahnemann Medical College, Philadelphia General Hospital, Philadelphia, Pennsylvania. Historical review and state of the art of pulmonary medicine and asbestos-related conditions. General pulmonary radiology and/or ILO interpretation of x-rays. May also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for

exposure to asbestos from first exposure to asbestos to last exposure. As a basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Wells (deceased), Custodian of Records, Seneca, South Carolina.

Dr. Rodney Wertz, 3621 22nd St., #400, Lubbock, Texas 79410 (806) 791-8484.

Dr. Irma West, 8428 Citadel Way, Sacramento, California. Dr. West was the head of the Bureau of Adult Health for the State of California for many years and will testify via videotape about the state of the art knowledge in the occupational health community from time to time and the medical priorities at those times.

Dr. Richard Wetzel, 6010 Amarillo Boulevard West, Amarillo, Texas 79106, (806) 355-9703.

Kemener Whalen, 5651 Morning Glory Lane, Littleton, Co. 80123.

Dr. George M. Wheatley, 16 Watersedge Ct., Locust Valley, NY.

Dr. Thomas Wheeler, 2929 Eagle Creek, Kingwood, Texas 77345. Dr. Wheeler is a pathologist who may testify about asbestos related diseases, causes of cancer, and the effect of other substances, such as cigarette smoke, on the respiratory system. He may also testify about his review of plaintiff's or decedent's medical records and pathology materials and his opinion as to whether plaintiff or the deceased suffers from an asbestos-related disease and the basis of such opinion.

James Whelan, Certified Rehabilitation Counselor, 3031 Tisch Way, Suite 901, San Jose, California 95128, (408) 247-6112. Mr. Whelan may testify regarding plaintiff's prospects for retraining and future employment opportunities.

Dr. Winfry Whicker, P. O. Box 595, China Grove, North Carolina 28023 and/or his Custodian of Records.

Norman Wilder, Internal Medicine Associates, Inc., 2841 Debarr Road, No. 50, Anchorage, Alaska 99508, (907) 276-2811. Dr. Wilder will testify concerning the state of the scientific and medical art in the history and knowledge of asbestos-related diseases and asbestos-related diseases in general, and the medical condition of plaintiffs epidemiology and general medicine regarding asbestos exposure. He may also provide opinions on the probable time period(s) of asbestos exposure with relation to the causation of the disease mesothelioma. In doing so, he will also provide percentages of probability of causation for exposure to

asbestos from first exposure to last exposure. As a basis for opinion, he will rely in part upon scientific papers published by Peto, Seidman and Selikoff, Morgan and Lampshear, among others.

Dr. Allan S. Wilensky, 801 Princeton Avenue, S.W., Suite 707, Birmingham, Alabama 35211 and/or his custodian of records.

Dr. Williamson (retired), Birmingham, Alabama and/or his custodian of records.

Dr. John F. Willis, 2301 Joseph Street, New Orleans, La. 70115 (504) 587-7625.

Charles F. Wilson. Will testify by deposition.

Dr. R. Keith Wilson, Pueblo Pulmonary Associates, 1925 East Orman, Pueblo, Colorado 81004. Dr. Wilson is a specialist in the area of respiratory diseases; he may testify to all matters pertaining to his examination of the plaintiff and plaintiff's medical records; any communications with the plaintiff or plaintiff's family; review of x-rays of the plaintiff; his opinion regarding whether plaintiff suffers from asbestos-related disease and the basis of such opinion; the plaintiff's current medical condition and his prognosis thereof; the anatomy and function of the respiratory and circulatory systems; the nature of asbestos; the symptomology, disease process and diagnosis of asbestosis and cancer associated with the respiratory system, peritoneum and peritoneal cavity; the nature and extent of medical and scientific knowledge regarding any association of pulmonary disease with asbestos exposure; the affect of exposure to substances other than asbestos on the development and manifestation of obstructive and restrictive conditions and diseases of the respiratory system; methods of diagnosis of various diseases, especially the means of establishing the differential diagnosis of alleged asbestos-related diseases with other non-asbestos-related disease; incidence of lung cancer among individuals with asbestosis as compared to non-asbestotic asbestos workers and to the general population; cigarette smoking and its affects on the lungs; the relationship of cigarette smoking to cancer of the lung and cancers of other body parts with reference to epidemiology studies and physiologic affect; the difference between impairment and disability; the affect of asbestosis on disability and life expectancy; and the lack of relationship between the presence of pleural plaques and a later development of any form of cancer.

Dr. Thomas Winoker, Veterans Affairs Medical Center, 700 South 19th St., Birmingham, Alabama 35233 (205) 933-8101.

Dr. Philip Witorsch, George Washington University Medical Center, 2100 Pennsylvania Avenue, N.W., Ste. 685, Washington D.C. 20037. Dr. Witorsch is expected to testify on matters relating to

occupational medicine and pulmonary medicine, including the methodology of reporting and publishing results of studies.

Otto Wong, Sc.D., P. O. Box 2078, San Mateo, California 94401
(415) 347-7898.

Mr. Wong has expertise in the areas of epidemiology, industrial hygiene and toxicology, both generally and particularly as those areas related to asbestos exposure and exposure to asbestos-containing friction products. His opinions and the grounds for same include the following matters: (a) the types, characteristics and chemical properties of asbestos and their respective pathogenic potential; (b) the types, composition and manufacture of friction materials; (c) the history of friction materials, the use of asbestos in friction materials and the lack of availability of suitable substitute materials for such use at relevant times; (d) decomposition of asbestos in friction materials during the wear process; (e) the composition of residual materials after wear does not include significant asbestos; (f) the effects of wear and the occupational environment of workers in which these products are used; (g) federal laws and regulations governing asbestos exposure; (h) threshold limit values and time-weighted averages; (i) characteristics and epidemiology of asbestos-related diseases; (j) relevant medical and scientific literature on these subjects; (k) the concepts of toxicity and hazard, including discussion of the human body's natural defense system; (l) dose response relationships; (m) potential for asbestos exposure in occupational settings; and (n) types, characteristics and uses of various types of asbestos. They may also be called to testify concerning certain (i) other details relating to aspects of and bases for these areas of opinions relating to this action or (ii) other matters of fact which because of technical nature may contain some opinions.

Dr. George W. Wright, 6405 South Manyon Parkway, Denver, Co. Historical review and state-of-the art of pulmonary medicine and asbestos-related conditions. General and asbestos-related pulmonary medicine and epidemiology relevant thereto. May also provide opinions on the probable period(s) of asbestos exposure, with relation to the causation of the disease mesothelioma. In doing so, this witness will also provide percentages of probability of causation for exposure to asbestos from first exposure to last exposure. As a basis for opinion, this witness will rely in part upon scientific papers published by Peto, Seidman and Selikoff, and Morgan and Lampshear, among others.

Dr. Ann Wylie, Colleg Park, MD.

Dr. Fasih Quamar Zaman, 371 6th Street, Gaffney, South Carolina 29340 and/or his custodian of records.

Dr. George Zeigler, Raleigh, North Carolina.

Elias Zerhouni, M.D., Radiologist; John Hopkins Hospital, MRI Room 143, Baltimore, Maryland 21205, (301) 955-4567. Dr. Zerhouni may testify regarding radiographic evidence pertaining to plaintiff's medical condition.

Mark W. Zibilich, M.D., Baylor University Medical Center, 3500 Gaston Avenue, Dallas, Texas 75246 (214) 820-0111.

Dr. George Zorn, 1900 University Boulevard, Birmingham, Alabama 35294 (205) 934-2536.

Dr. Gordon Zucker, Butte, MT.

Plaintiffs' health care providers may testify, either live or by medical records offered at time of trial, as to their examination of the plaintiffs, their findings, conclusions, testing, test results, and diagnoses; they may also provide factual information as to plaintiffs' smoking history, exposure history, and other medical conditions.

Any and all of plaintiffs' treating physicians whose names, addresses and qualifications are already known to plaintiffs' attorneys to testify as to plaintiff's physical conditions.

Defendant reserves the right to call any expert witnesses designated by plaintiffs or any other defendant in this cause; this includes all treating physicians, healthcare providers, and medical record custodians.

If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.

Kelly Moore also lists all physicians who examined plaintiffs and/or treated or have reviewed medical records, reports, x-rays or pathology slides or reports pertaining to plaintiffs.

Defendant incorporates herein all of the expert witnesses which have been listed or designated by any other party to this litigation.

Defendant also reserves the right to use any affidavits, depositions, answers to interrogatories and responses to request for admissions by any other party to this action, whether or not such party is still a party at the time of the trial.

Defendant further reserves the right to call any witnesses who may be necessary for rebuttal testimony.

Any and all medical experts retained by the law firms of DeHay & Elliston, Baker & Botts, Butler & Binion, Forman, Perry, Watkins & Krutz, Bean & Manning, or any other counsel in their role as liaison defense counsel.

This defendant reserves the right to file a supplemental list of expert witnesses, based on discovery conducted subsequent to the date of preparation of this designation of expert witnesses.

- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you and, if so, identify each such document or report.

ANSWER: See IME reports sent to plaintiffs' counsel and made available to other parties. The IME reports have been or will be produced in some cases by either Kelly Moore Paint Company or other defendants. In the event defendants' experts prepare a report or other documentation for use at trial, such documents will be provided to plaintiffs' counsel by either Kelly Moore Paint Company, Inc. or one of the other defendants.

- (e) Identify all documents that you have provided to each person identified in response to subparagraph (a) above.

ANSWER: If defendant has provided medical records to a particular physician, a copy of an IME report will be sent to plaintiffs and made available to the other parties. This defendant cannot speculate or state whether other defendants have provided documents to any of the experts identified.

- (f) Describe in detail the education and work history of and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of the resume or curriculum vitae and a list of publications to your answers.

ANSWER: See attached curriculum vitae of Dr. Scott Donaldson and Dr. Gregory Foster (previously filed).

EXHIBIT "D"

LIST OF OPEN KELLY-MOORE PAINT COMPANY, INC.
PAINT STORES FROM 1960 TO THE PRESENT IN TEXAS

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EXHIBIT "D"

STORE	DATE OPENED	DATE RELOCATED	DATE CLOSED	CURRENT ADDRESS
Abilene	1966	NA	NA	3435 N. First Street Abilene, TX 79603
Amarillo	1965	NA	NA	2722 Duniven Circle Amarillo, TX 79109
Arlington	1971	1972	NA	2506 S. Cooper Street Arlington, TX 76015
Austin	1973	NA	NA	9525 Burnet Road Austin, TX 78758
Austin	1971	1978	NA	4107 Victory Drive Austin, TX 78704
Beaumont	1976	1978	NA	4050 Eastex Freeway Beaumont, TX 77708
Corpus Christi	1973	NA	1975	Part of Carmel Shopping Center, 4112 S. Staples, Corpus Christi, TX
Dallas	1970	1971	NA	10926 Garland Road Dallas, TX 75218
Farmer's Branch	1965	1993	NA	14030 Josey Lane Farmer's Branch, TX 75234
Fort Worth	1966	1971	NA	1051 East Seminary Dr., Fort Worth, TX 76115
Fort Worth	1978	NA	Unknown	Ridgmar Fort Worth, TX
Houston	1973	1994	NA	4704 A Airline Drive Houston, TX 77022
Houston	1966	NA	NA	5506 Bellaire Blvd. Houston, TX 77081
Houston	1965	NA	1983	Jensen Drive Houston, TX

**LIST OF OPEN KELLY-MOORE PAINT COMPANY, INC.
PAINT STORES FROM 1960 TO THE PRESENT IN TEXAS
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Houston	1973	NA	1975	Lawndale Houston, TX
Houston	1974	NA	1975	Goodnight Trail Houston, TX
Houston	1976	NA	1994	Steubner Houston, TX
Hurst	1962	1970	NA	301 - 305 West Hurst Blvd., Hurst, TX 76053
Irving	1975	1983	NA	825 N Beltline Road Irving, TX 75061
Killeen	1976 Re- opened 1995	NA	1978	414 N. Eighth, Killeen, TX; REOPENED STORE - 302 East Elms Road, Killeen, TX 76542
Longview	1975	1980	NA	920 W Loop 281 Longview, TX 75604
Lubbock	1970	1972	NA	4521 - 50th Street Lubbock, TX 79414
Odessa	1976	1988	NA	2901 N. Grandview Odessa, TX 79762
Pasadena	1976	NA	1993	2941 Spencer Highway, Pasadena, TX 77504
Richard- son	1971	1988	NA	531 W. Arapaho, Suite 109, Richardson, TX 75080
River Oaks	1974	NA	1976	Unknown
San Angelo	1975	NA	NA	805 West Avenue N San Angelo, TX 76901
San Antonio	1973	NA	1974	Blanco San Antonio, TX

LIST OF OPEN KELLY-MOORE PAINT COMPANY, INC.
PAINT STORES FROM 1960 TO THE PRESENT IN TEXAS
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San Antonio	1962	1966	NA	6622 San Pedro San Antonio, TX 78216 or 12824 Nacogdoches Road, San Antonio, TX 78217
Tyler	1973	1982	NA	7408 Troup Highway Tyler, TX 75703
Waco	1975	NA	NA	4427 West Waco Drive Waco, TX 76710