

NO. 00-8305

DARWELL GENE BUSH, ET AL.	§	IN THE DISTRICT COURT OF
	§	
VS.	§	DALLAS COUNTY, TEXAS
	§	
GAF CORPORATION (f/k/a NEWCO	§	
HOLDINGS, INC.), ET AL.	§	M-298TH JUDICIAL DISTRICT

**DEFENDANT SHELL OIL COMPANY'S 10/29/01 SUPPLEMENTAL
RESPONSE TO REQUEST FOR DISCLOSURE CONCERNING EXPERTS
SUBJECT TO MOTION TO TRANSFER VENUE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant **SHELL OIL COMPANY** and in supplementation to the Defendant's response to Request for Disclosure concerning experts, designates the following additional expert:

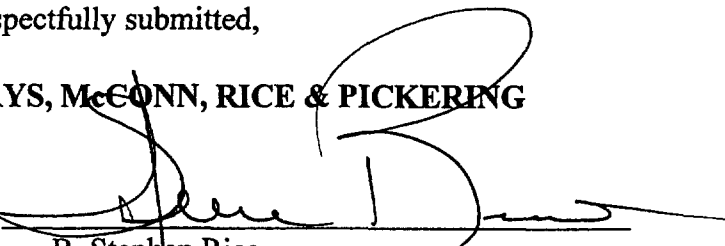
Richard C. Hebert, M.D.
Pulmonary Disease Clinic
5000 Hennessy Blvd.
Baton Rouge, LA 70808
504-769-5864

Dr. Hebert is a pulmonologist residing in Baton Rouge, Louisiana. He is a specialist in the area of respiratory disease. Dr. Hebert may testify as to all matters pertaining to his examination of plaintiff JAMES A. GUILLORY and/or review of plaintiff's medical records, x-rays, and reports and supplemental reports of plaintiff's experts; any communications with plaintiff or plaintiff's family members; the diagnostic criteria used to diagnose asbestos-related diseases; his opinions as to whether plaintiff suffers from asbestos-related disease and the basis of such opinions; the plaintiff's current medical condition and his prognosis thereof, the anatomy and function of the respiratory and circulatory systems; 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; and the effect of smoking on the lungs.

Dr. Hebert's C.V. is attached.

Respectfully submitted,

HAYS, McCONN, RICE & PICKERING

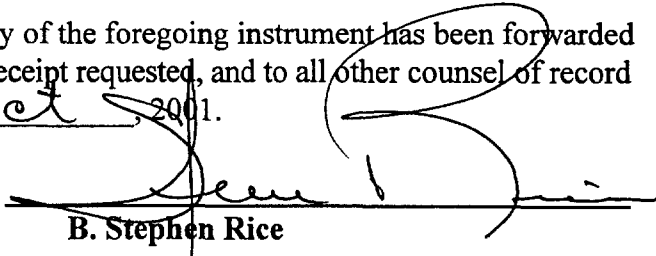
By: 

B. Stephen Rice
TSB No. 16838000
1200 Smith Street, Suite 400
Houston, Texas 77002
Telephone: (713) 654-1111
Facsimile: (713) 650-0027

Attorney for Defendant, **SHELL OIL COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to counsel for Plaintiffs by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this 29th day of Oct, 2001.


B. Stephen Rice

*Curriculum Vitae***RICHARD C. HEBERT, M.D.****Current Positions**

Private Group Practice
Pulmonary and Critical Care Medicine
Pulmonary Disease Clinic
5000 Hennessy Blvd.
Baton Rouge, LA 70808
1977-Present

Personal Information

Date of birth: 12/5/40
Place of birth: Morganza, Louisiana
Home address: 6267 Sevenoaks Ave.
Baton Rouge, La. 70806
(504) 924-4372

Professional Address

7777 Hennessy Blvd., Ste 701
Baton Rouge, La. 70808
(504) 769-5864

Social Security No.

Available on request

Present Academic Rank

L.S.U. School of Medicine
Pulmonary Medicine
Associate Clinical Professor of Medicine

Education

Louisiana State University Baton Rouge
B.S. Chemistry 1963

L.S.U. School of Medicine
M.D. 1966

L.S.U. School of Medicine
New Orleans Charity Hospital
Rotating Internship 7/66-6/67

L.S.U. School of Medicine
Lafayette Charity Hospital
General Practice Residency 7/67-6/68

William Beaumont General Hospital, U.S. Army
El Paso, Texas

Internal Medicine Residency 10/68-9/71

Board Certification ABIM Internal Medicine 1972
ABIM Pulmonary Medicine 1976
ABIM Critical Care Medicine 1987

Medical License Louisiana 10300

Honors/Awards Alpha Omega Alpha
Phi Kappa Phi
Undergraduate Medical Society

Military Service U.S. Army 1968-1973
Rank: Major

Previous Positions Medical Director of Medical Services
Our Lady of the Lake Regional Medical Center
7777 Hennessy Blvd., Suite 701
Baton Rouge, LA 70808
1992-1997

LSU School of Medicine
Earl K. Long Memorial Hospital
Associate Clinical Professor
1974-77

Private Practice, Crowley, La.
1973-1974

Professional Memberships Louisiana State Medical Association
East Baton Rouge Parish Medical Association
American College of Physicians
Fellow American College of Chest Physicians
American Thoracic Society
Louisiana Thoracic Society
American Association for Respiratory Care
Louisiana Society for Respiratory Care

Institutional Positions Medical Advisor
Louisiana Society for Respiratory Care
1995-1997

Chief, Medical Intensive Care Unit

Our Lady of the Lake Regional Medical Center
1990-94

President, Baton Rouge Academy of
Internal Medicine
1988-89

Chief of Staff
Earl K. Long Memorial Hospital
1982-83

Chief Internal Medicine Service
Our Lady of the Lake Regional Medical Center
1981-82

Medical Director Respiratory Care
Baton Rouge General Medical Center
1980-1993

Medical Director
Southeastern University
School of Respiratory Therapy
1979-1993

Medical Director Respiratory Care
Earl K. Long Memorial Hospital
1974-78

Medical Director School of Respiratory Therapy
Earl K. Long Memorial Hospital
1974-1977

Medical Advisor
Louisiana Society for Respiratory Care
1979-81

Publications:

OBSTRUCTION OF AN ENDO-TRACHEAL TUBE BY
ITS HIGH PRESSURE CUFF: RESPIRATORY CARE,
1981.

AIR QUALITY AND RESPIRATORY FUNCTIONING
IN CHILDREN WITH PULMONARY DISORDERS.
*JOURNAL OF THE LOUISIANA STATE MEDICAL
SOCIETY* 1994; 455-461.

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VS.

GAF CORPORATION (f/k/a NEWCO
HOLDINGS, INC.), ET AL.

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

M-298TH JUDICIAL DISTRICT

DEFENDANT SHELL OIL COMPANY'S
CERTIFICATE OF WRITTEN DISCOVERY

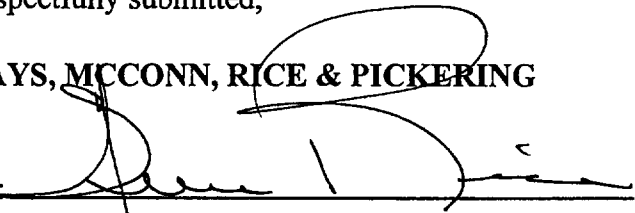
TO THE HONORABLE JUDGE OF SAID COURT:

The undersigned counsel for Defendant SHELL OIL COMPANY certifies pursuant to Local Rules that the following has been served upon all counsel of record but has not been filed with the Clerk's office:

- 1) **Defendant Shell Oil Company's 10/29/01 Supplemental Response to Plaintiff's Request for Disclosure Concerning Experts Subject to Motion to Transfer Venue.**

Respectfully submitted,

HAYS, MCCONN, RICE & PICKERING

By: 

B. STEPHEN RICE

State Bar No. 16838000

1200 Smith Street, Suite 400

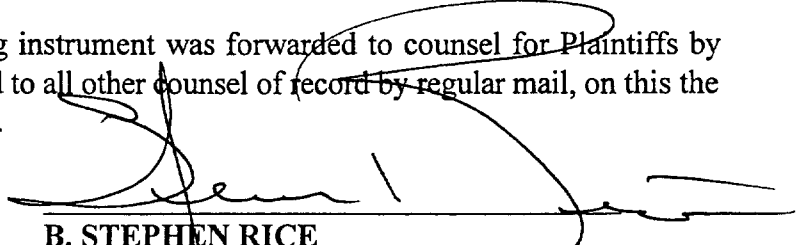
Houston, Texas 77002

(713) 654-1111/(713) 655-9212-FAX

Attorneys for Defendant, SHELL OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was forwarded to counsel for Plaintiffs by certified mail, return receipt requested, and to all other counsel of record by regular mail, on this the 29th day of Oct, 2001.


B. STEPHEN RICE