

1H 041880

EXHIBIT "A"

<u>Plaintiff/Defendant</u>	<u>Cause No.</u>	<u>Nueces County District Court</u>
Apolonio Adames vs. 3M, et al	85-1857-A	28th
Jessie Laing vs. Raymark, et al	86-5264-A	28th
Ronnie West vs. 3M, et al	85-1848-A	28th
Warren Caddell vs. 3M, et al	85-2410-B	117th
Francisco Castillo vs. 3M, et al	86-0080-B	117th
Henry Crawford vs. 3M, et al	85-1853-B	117th
James Crawford vs. 3M, et al	85-1860-B	117th
Higinio Flores vs. 3M, et al	86-5265-B	117th
Pete Maldonado vs. 3M, et al	86-0069-B	117th
Raul Navarro vs. 3M, et al	85-1864-B	117th
Manuel Valadez vs. 3M, et al	85-1849-B	117th
Billy Young vs. Raymark, et al	86-5222-B	117th
Gilbert Alvarez vs. 3M, et al	85-6443-C	94th
R.L. Elliott vs. 3M, et al	86-0067-C	94th
Elvis Marshall vs. 3M, et al	85-1850-C	94th
James Martin vs. 3M, et al	85-1868-C	94th
Alvaro Pena vs. 3M, et al	85-1983-C	94th
Manuel Pena vs. 3M, et al	85-1862-C	94th
David Robinson vs. 3M, et al	85-1865-C	94th
Greg Sanchez Jr. vs. Raymark, et al	86-5148-C	94th
Roberto Castanon vs. Raymark, et al	86-5223-D	105th
Louis Malone vs. 3M, et al	85-6445-D	105th
James McKoin vs. 3M, et al	85-1866-D	105th
Rufino Sanchez vs. 3M, et al	85-6442-D	105th
James Voeste vs. 3M, et al	85-1976-D	105th
Wilmer Davis vs. Raymark, et al	86-5147-E	148th
Guillermo Espinoza vs. 3M, et al	85-1858-E	148th
Othon Guillen vs. 3M, et al	85-1867-E	148th
Marshall Johnson vs. 3M, et al	86-3215-E	148th
Wallace Moerbe vs. 3M, et al	86-3217-E	148th
Laddie Pendergraft vs. 3M, et al	85-1859-E	148th
Bartelo Roldan vs. 3M, et al	85-1974-E	148th
Elmer Stacy vs. Raymark, et al	86-5263-E	148th
James Young vs. 3M, et al	85-1975-E	148th
Elmer Bliss vs. 3M, et al	85-1980-E	148th
Edward Nettles vs. 3M, et al	85-1846-E	148th
Leroy Allen vs. Raymark, et al	86-5224-F	214th
Martin Drummond vs. 3M, et al	85-1851-F	214th
German Moreno vs. 3M, et al	85-6444-F	214th
Jesus Navarro vs. 3M, et al	85-1855-F	214th
Santiago Reyna vs. 3M, et al	85-1969-F	214th
John Wimbish vs. 3M, et al	85-1861-F	214th
Fernando Villarreal v. Clemtex, et al	85-5998-F	214th
Santiago Acosta vs. 3M, et al	86-0068-G	319th
Norma Curry vs. 3M, et al	85-1838-G	319th
Betty Drummond vs. 3M, et al	85-1982-G	319th
Helio Perez vs. 3M, et al	86-3214-G	319th
Epifanio Soto vs. 3M, et al	85-2549-G	319th
Pedro Trujillo vs. 3M, et al	86-0066-G	319th
Arlie Brown vs. 3M, et al	85-1839-G	319th

<u>Plaintiff/Defendant</u>	<u>Cause No.</u>	<u>Nueces County District Court</u>
Lewis Bain vs. 3M, et al	85-1852-H	347th
Douglas Glover vs. 3M, et al	85-6446-H	347th
Earl McMannis vs. Raymark, et al	86-3216-H	347th
Juan Mendoza vs. 3M, et al	85-1856-H	347th
Manuel Rios vs. Raymark, et al	86-5262-H	347th
Ronald Wilkins vs. 3M, et al	85-1863-H	347th
Curtis Roberts vs. 3M, et al	85-1837-H	347th
 Fred Roberts vs. 3M, et al;	 379,331	 147th D.C. Travis County, TX

NOTICE OF INTENTION TO TAKE
ORAL DEPOSITION & SUBPOENA DUCES TECUM

TO: Defendants, A C & S, INC., ARMSTRONG WORLD INDUSTRIES, INC., CELOTEX CORPORATION, COMBUSTION ENGINEERING, EAGLE-PICHER INDUSTRIES, INC., FIBREBOARD CORPORATION, GAF CORPORATION, KEENE CORPORATION, MINNESOTA MINING & MANUFACTURING, NATIONAL GYPSUM COMPANY, NICOLET INDUSTRIES, INC., OWENS-CORNING FIBERGLAS CORPORATION, OWENS-ILLINOIS, INC., PITTSBURGH CORNING CORPORATION, H.K. PORTER COMPANY, INC., RAYMARK INDUSTRIES, INC., UNITED STATES GYPSUM CORPORATION, ACETYLENE OXYGEN COMPANY, AIRCO, INC., AIR PRODUCTS & CHEMICALS, INC., CHEMETRON CORPORATION, EUTECTIC CORP., LOUIS GERSON CO., HOBART BROTHERS COMPANY, INTERNATIONAL NICKEL COMPANY, THE LINCOLN ELECTRIC COMPANY, MILLER ELECTRIC MANUFACTURING COMPANY, NATIONAL CYLINDER GAS, A.O. SMITH CORP., STOODY CO., TELEDYNE INDUSTRIES, INC., UNION CARBIDE CORPORATION, WESTINGHOUSE ELECTRIC CORPORATION; BIG THREE INDUSTRIES, BOWEN TOOLS INC., E.D. BULLARD CO., CENTEX CORP., CLEMCO INDUSTRIES, CLEMTEX LTD., EMPIRABRASIVE EQUIP. CO., LONE STAR INDUSTRIES, INC., PARMELEE INDUSTRIES, INC., PAULI & GRIFFIN CO., PULMOSAN SAFETY EQUIPMENT CORP., THORSTENBERG MATERIALS CO., by and through their respective attorney's of record.

PLEASE TAKE NOTICE that at 9:00 o'clock A.M. on the 19th day of May, 1987, in the Offices of Chaves, Gonzales & Rodriguez, 1400 First City Tower II, 555 North Carancahua, Corpus Christi, Texas, 78478, pursuant to Texas Rules of Civil Procedure 201 (4), the Plaintiffs in the above styled causes of action will take the deposition of KERR MCGEE CORP., formerly Southwestern, 502 N. Water, Corpus Christi, Texas, or its purchasing agent, person or persons most knowledgeable of insulation materials containing asbestos purchased from 1940 to the present, and to testify concerning the following matters, upon oral examination before an officer authorized by the Texas Rules of Civil Procedure to take such deposition, which deposition may be used upon the trial of these causes.

The witness, KERR MCGEE CORP., shall designate one or more officers, directors, or purchasing agents or other persons to testify on its behalf concerning the following matters:

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Knowledge of the purchase of asbestos containing insulation products from the years 1940 to the present.

And, pursuant to Tex. R. Civ. P. 201 (4), a subpoena duces tecum shall be issued to KERR MCGEE CORP., requiring such witness to produce at the stated time, date, and place, the following:

1. Any and all records, invoices, memorandum, or other similar written document showing or tending to show purchases of asbestos containing insulation products from the years 1940 to the present.

2. Any and all records, invoices, memoranda, or other similar written document showing or tending to show purchases of asbestos containing safety garments purchased from the years 1940 to the present.

3. Any and all records, invoices, memoranda, or other similar written document showing or tending to show purchases of dust masks purchased from 1940 to the present.

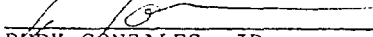
4. Any and all photographs, sales catalogs, advertisement brochures, or other materials in your possession, custody and/or control depicting asbestos containing insulation products.

5. Any and all records, invoices, purchase memoranda, from or to the following companies, their predecessors and/or their subsidiary companies:

- A. AC & S, INC.
- B. ARMSTRONG WORLD INDUSTRIES, INC.
- C. CELOTEX CORPORATION
- D. COMBUSTION ENGINEERING
- E. EAGLE-PICHER INDUSTRIES, INC.
- F. FIBREBOARD CORPORATION
- G. GAF CORPORATION
- H. LOUIS GERSON CO.
- I. KEENE CORPORATION
- J. MINNESOTA MINING & MANUFACTURING
- K. NATIONAL GYPSUM COMPANY
- L. NICOLET INDUSTRIES, INC.
- M. OWENS-CORNING FIBERGLAS CORP.
- N. OWENS-ILLINOIS, INC.
- O. PITTSBURGH CORNING CORPORATION
- P. H.K. PORTER COMPANY, INC.
- Q. RAYMARK INDUSTRIES, INC. (Raybestos-Manhattan)
- R. UNITED STATES GYPSUM CORPORATION
- S. Any local supply house situated in Nueces County, for the purchase of any asbestos containing insulation materials.

Respectfully submitted,

CHAVES, GONZALES & RODRIGUEZ
1400 First City Tower II
555 North Carancahua
Corpus Christi, Texas 78478
(512) 888-9392

BY: 

RODY GONZALES, JR.,
State Bar No. 08121700

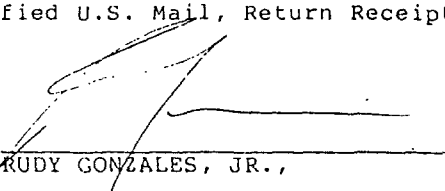
ATTORNEY FOR PLAINTIFFS

SWRf/Asbestos 6523

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 1987, a true and correct copy of the foregoing Notice of Intention to take Oral Deposition was forwarded to all counsel of record by and through their attorneys of record, by Certified U.S. Mail, Return Receipt Requested, postage paid.

BY: 

RUDY GONZALES, JR.,

SWR/Asbestos 6524

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