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EMAIL: tbroughton@hunton.comPLAINTIFF'S
EXHIBIT
RMC-630

September 5, 2000

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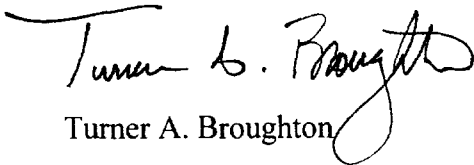
**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**Stephanie A. Finch, Esquire
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219**Re: Gilberto Antonio Balli v. Owens-Corning Fiberglas Corp., et al.**

Dear Stephanie:

Enclosed please find *Defendant Reynolds Metals Company's Preliminary Designation of Expert Witnesses*.

If you have any questions please do not hesitate to contact this office.

Very truly yours,


Turner A. Broughton

Enclosure

cc: All known counsel of record (via facsimile and U.S. mail w/o encl.)

GILBERTO ANTONIO BALLI, et al.,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
v.	§	NUECES COUNTY, TEXAS
	§	
OWENS CORNING (a/k/a OWENS	§	
CORNING CORPORATION), et al.,	§	
	§	
Defendants.	§	319th JUDICIAL DISTRICT

DEFENDANT REYNOLDS METALS COMPANY'S
PRELIMINARY DESIGNATION OF EXPERT WITNESSES

Defendant Reynolds Metals Company ("Reynolds"), by counsel, designates the following expert witnesses whom it may call to testify at the trial of this matter:

- Peter J. Barrett, M.D.**
300 Boylston Street
Suite 714
Boston, Massachusetts 02116-3923
(617) 426-2110

Dr. Barrett is an expert radiologist and certified B-reader whom Reynolds may call at the trial of this matter to testify regarding his expert analysis of certain x-rays and medical records of Plaintiffs Barneac and Marroquin. Dr. Barrett may testify as to his review of the Plaintiffs' medical records and conclusions reached from this review. Dr. Barrett is expected to testify that the x-rays of Mr. Barneac and Mr. Marroquin do not demonstrate any evidence of exposure to asbestos.

Specifically, with respect to Plaintiffs Barnech and Marroquin, Dr. Barrett will testify that the x-rays show that there are no pleural plaques or fibrosis on Mr. Barnech's and Mr. Marroquin's lungs, and no evidence of asbestosis. He will testify that, in his opinion, Mr. Barnech and Mr. Marroquin have no asbestos-related disease.

Dr. Barrett further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Barrett further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**2. Jerome F. Wiot, M.D.
Department of Radiology
222 Piedmont Avenue
Suite 2100
Cincinnati, Ohio 45219**

Dr. Wiot is an expert radiologist and certified B-reader whom Reynolds may call at the trial of this matter to testify regarding his expert analysis of certain x-rays and medical records of Plaintiffs Barnech and Marroquin. Dr. Wiot may testify as to his review of Plaintiffs' medical records and conclusions reached from this review. Dr. Wiot is expected to testify that the x-rays of the Plaintiffs do not demonstrate exposure to asbestos. Specifically, the x-rays of the Plaintiffs

show that there are no pleural plaques or fibrosis on Plaintiffs' lungs, and no evidence of asbestosis. He will testify that, in his opinion, Plaintiffs Barnec and Marroquin do not have an asbestos-related disease.

Dr. Wiot further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Wiot further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

3. Hans Weill, M.D.
755 Hearthstone Drive
Basalt, Colorado 81621-2135
(970) 927-9321

Dr. Weill is a pulmonary specialist whom Reynolds may call at the trial to offer expert testimony regarding any and all medical issues in this matter. Dr. Weill's opinions may be based on his specialized knowledge, education, training and experience, as well as his review of any and all pleadings, transcripts of depositions to be taken in this matter and any and all medical records, x-rays and other documents to be produced in discovery. Dr. Weill is expected to testify regarding the medical condition of Plaintiffs Barnec and Marroquin, and as to the issues of

causation – or lack thereof – between any alleged exposure to asbestos fibers and the medical condition of the Plaintiffs.

Dr. Weill further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Weill further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**4. Gail Diane Stockman, M.D.
Longview Pulmonary Consultants
Medical Plaza
703 East Marshall Street, Suite 4002
Longview, Texas 75601
(903) 753-0787**

Dr. Stockman is an expert pulmonologist whom Reynolds may call at the trial of this matter to offer expert opinion testimony as to any and all medical issues in the case. Dr. Stockman's opinions may be based on her specialized knowledge, education, training and experience, as well as her review of any and all pleadings, transcripts of depositions to be taken in this matter and any and all medical records, x-rays and other documents to be produced in discovery. Dr. Stockman's opinions also may be based on a medical examination of the Plaintiffs. Dr. Stockman is expected to testify regarding the medical condition of Plaintiffs

Barnece and Marroquin, that they are not suffering from an asbestos related disease, and as to the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and his medical condition.

Dr. Stockman further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to her expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Stockman further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to her expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Stockman further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**5. Kathryn Ann Hale, M.D.
Baylor College of Medicine
Pulmonary Section
6550 Fannin St., Suite 1236
Houston, Texas 77030
(713) 790-2076**

Dr. Hale is an expert pulmonologist whom Reynolds may call at the trial of this matter to offer expert opinion testimony as to any and all medical issues in the case. Dr. Hale's opinions may be based on her specialized knowledge, education, training and experience, as well as her review of any and all pleadings, transcripts of depositions to be taken in this matter and any and all medical records, x-rays and other documents to be produced in discovery. Dr. Hale's opinions also may be based on a medical examination of the Plaintiffs. Dr. Hale is expected to testify regarding the medical condition of Plaintiffs Barnech and Marroquin, that they are not suffering from an asbestos related disease, and as to the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and their medical condition.

Dr. Hale further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to her expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Hale further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**6. William G. Hughson, M.D., Ph.D.
University of California Center for
Occupational Disease Control
200 West Arbor Drive
San Diego, CA 92103-8800
(619) 294-6001**

Dr. Hughson is the Director of the Occupational Health Center and an Associate Clinical Professor of Medicine at the University of California, San Diego. Dr. Hughson's opinions may be based on his specialized knowledge, education, training and experience, as well as his review of any and all pleadings, deposition transcripts, any and all medical records, x-rays and other documents produced in this litigation. Dr. Hughson may testify as to any and all medical issues, including those in the area of pulmonology, occupational medicine, epidemiology, state-of-the art and asbestos disease. He is expected to testify regarding the medical condition of Plaintiffs Barnech and Marroquin, and as to the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and their medical condition.

Dr. Hughson further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Hughson further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

7. **Jack E. Petersen, P.E., Ph.D., CIH**
Petersen Associates
Industrial Hygiene Consultants
2830 Via Viejas Oeste
Alpine, California 91901
(619) 445-9668

Dr. Petersen is a certified industrial hygienist whom Reynolds may call at the trial of this matter to offer expert testimony generally as to industrial hygiene state of the art. He has personal knowledge of some facts, but is also an expert based upon his specialized knowledge, skill and training.

He may testify as to his review of documents provided to him regarding Reynolds' corporate history and knowledge pertaining to asbestos, documents produced by Plaintiffs Barnech and Mr. Marroquin in this litigation, and published and unpublished reports. Dr. Peterson is familiar with the workings of reduction and alumina plants and the potential for exposure to occupational hazards, including asbestos fibers. He may testify about his knowledge of the composition and asbestos content, if any, of the products to which Plaintiffs Barnech and Marroquin allegedly were exposed. He also may testify about the working environment of reduction plants and the potential exposure risks from differing activities in general, and of the Reynolds' San Patricio and Sherwin plants in particular. He is expected to testify, based on his review of relevant documents and other evidence, that the Plaintiffs were not exposed to harmful levels of asbestos at any Reynolds facility, and that Reynolds complied with the appropriate standard of care. Specifically, he will testify that a review of the deposition testimonies, work history sheets, employment records, and the documents related to the specific work being performed by Plaintiffs, shows that within a reasonable degree of scientific certainty, Plaintiffs should not have been exposed to harmful levels of airborne asbestos fibers while on Reynolds' premises. He will testify that the records of such work show no harmful asbestos exposure.

He may testify to industrial hygiene state-of-the-art issues, generally, and specifically, to industrial hygiene issues related to Reynolds' Sherwin and San Patricio Plants. This state-of-the-

art testimony may also include the development of knowledge concerning the potential risk for certain populations including boilermakers, welders and electricians. He may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure. He further may testify generally about applicable governmental standards, standard industrial hygiene practices, principles and methodologies of the time and the history and use of threshold limit values. He is expected to testify that Reynolds' conduct met and exceeded the applicable standard of care and that Reynolds breached no duty to either Mr. Barneec or Mr. Marroquin.

Dr. Petersen further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**8. J. Leroy Balzer, Ph.D.
408 Horse Trail Court
Walnut Creek, California 94595
(510) 274-1413**

Dr. Balzer is an expert in industrial hygiene, occupational and environmental health and safety, forensic science and state-of-the art. Reynolds may call Dr. Balzer as an expert witness to testify, either live or by deposition, in any or all of these fields. He has personal knowledge of some facts, but is also an expert based upon his specialized knowledge, skill and training.

He may testify as to his review of documents provided to him regarding Reynolds' corporate history and knowledge pertaining to asbestos, documents produced by Plaintiffs Barneec and Marroquin in this litigation, and published and unpublished reports.

Dr. Balzer is familiar with the workings of reduction and alumina plants and the potential for exposure to occupational hazards, including asbestos fibers. He may testify about his knowledge of the composition and asbestos content, if any, of the products to which Plaintiffs Barnece and Marroquin allegedly were exposed. He also may testify about the working environment of reduction plants and the potential exposure risks from differing activities in general, and of Reynolds' San Patricio and Sherwin plants in particular. He is expected to testify, based on his review of relevant documents and other evidence, that the Plaintiffs were not exposed to harmful levels of asbestos at any Reynolds facility, and that Reynolds complied with the appropriate standard of care. Specifically, he will testify that a review of the deposition testimonies, work history sheets, employment records, and the documents related to the specific work being performed by Plaintiffs, shows that within a reasonable degree of scientific certainty, Plaintiffs should not have been exposed to harmful levels of airborne asbestos fibers while on Reynolds' premises. He will testify that the records of such work show no harmful asbestos exposure.

He may testify to industrial hygiene state-of-the-art issues, generally, and specifically, to industrial hygiene issues related to Reynolds' Sherwin and San Patricio Plants. This state-of-the-art testimony may also include the development of knowledge concerning the potential risk for certain populations including boilermakers, welders and electricians. He may testify about industrial hygiene principles and methodologies used to determine potential hazards due to asbestos exposure. He further may testify generally about applicable governmental standards, standard industrial hygiene practices, principles and methodologies of the time and the history and use of threshold limit values. He is expected to testify that Reynolds' conduct met and

exceeded the applicable standard of care and that Reynolds breached no duty to either Mr. Barnech or Mr. Marroquin.

Dr. Balzer further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**9. William L. Dyson, Ph.D., CIH
1022 Jefferson Road
Greensboro, North Carolina
(910) 665-0847**

Dr. Dyson is an industrial hygienist and an industrial hygiene consultant in Greensboro, North Carolina. He may testify, at trial or by deposition, as an expert regarding general industrial hygiene standards and related issues, threshold values, permissible exposure limits and/or other documentary evidence relevant to the defense of Plaintiffs' claims regarding damages and causation. He may testify, if relevant, specifically about the history of industrial and scientific knowledge, research and study of exposure to asbestos and its effects on the human body, as to all state of the art issues; as to his expert opinion as to safe levels of asbestos exposure and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects of exposure to various types of asbestos fibers. He may testify as to the applicable governmental standards and about the history and use of the threshold limit values and permissible exposure levels, as well as measurement techniques. This state-of-the-art testimony may also include the development of knowledge concerning the potential risk for certain populations including boilermakers, welders and electricians.

He may testify as to his review of documents provided to him regarding Reynolds' corporate history and knowledge pertaining to asbestos, documents produced by Plaintiffs in this litigation, and published and unpublished reports. Dr. Dyson is familiar with the workings of reduction and alumina plants in general and Reynolds' Sherwin and San Patricio Plants in particular. He also is familiar with the use of asbestos in such plants and the potential for

exposure to asbestos fibers. He may testify about his knowledge of the composition and asbestos content, if any, of the products to which Plaintiffs allege exposure.

He is expected to testify, based on his review of relevant documents and other evidence, that Plaintiffs Barneac and Marroquin were not exposed to harmful levels of asbestos at any Reynolds facility, and that Reynolds complied with the appropriate standard of care. Specifically, he will testify that a review of the deposition testimonies, work history sheets, employment records, and the documents related to the specific work being performed by Plaintiffs, shows that within a reasonable degree of scientific certainty, Plaintiffs should not have been exposed to harmful levels of airborne asbestos fibers while on Reynolds' premises. He will testify that the records of such work show no harmful exposure.

Dr. Dyson further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**10. Elliot Hinkes, M.D.
301 North Prairie Avenue, Suite 311
Inglewood, California 90301
(310) 674-0050**

Dr. Hinkes is a board-certified oncologist whom Reynolds may call as an expert witness at the trial of this matter to provide testimony regarding any and all medical issues in the case. His testimony may include, but is not limited to, the nature of asbestos and asbestos-related diseases generally; the nature and extent of any asbestos-related disease or injury which Mr. Barneac and Mr. Marroquin may have or have had; the history of evolution and knowledge of asbestos-related diseases; causation; and, asbestos medicine in general. Dr. Hinkes' expert

opinions may be based on his specialized knowledge, education, training and experience, as well as his review of any and all pleadings, transcripts of depositions, any and all medical records, x-rays and other documents produced in this litigation.

Dr. Hinkes further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Hinkes further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**11. Robert N. Sawyer, M.D.
Entek Environmental and Technical Services, Inc.
1724 5th Avenue
Troy, New York 12180**

Dr. Sawyer is a specialist in the field of asbestos exposure, risk assessment, and safety whom Reynolds may call at the trial to offer expert testimony regarding any and all issues concerning asbestos in this matter. Dr. Sawyer's opinions may be based on his specialized knowledge, education, training and experience, as well as his review of any and all pleadings, transcripts of depositions to be taken in this matter, and any and all records, analyses, diagnoses, reports, x-rays, surveys and other documents to be produced in discovery.

Dr. Sawyer further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Sawyer is expected to testify regarding health issues associated with asbestos. It is further expected that he will testify regarding the levels of asbestos exposure, if any, from various types of products, as well as the amount of asbestos exposure, and the fiber type necessary to cause or contribute to the formation of various types of asbestos-related diseases. He may testify that Mr. Barnece and Mr. Marroquin were not exposed to harmful levels of asbestos from products at Reynolds' Sherwin and San Patricio facilities.

Dr. Sawyer further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; and as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions.

Dr. Sawyer further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiff or any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

- 12. Andrew Churg, M.D.
The University of British Columbia
2211 Wesbrook Mall
Vancouver, B.C. Canada V6T1W5
(604) 875-4480**

Dr. Churg is a board-certified pathologist whom Reynolds may call as an expert witness at the trial of this matter to provide testimony regarding any and all medical issues in the case. His testimony may include, but is not limited to, the nature of asbestos and asbestos-related diseases generally; the nature and extent of any asbestos-related disease or injury which Plaintiffs Barnech and Marroquin may have; the history of evolution and knowledge of asbestos-related diseases; the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and the medical condition of the Plaintiffs; and, the relative importance of various fiber types and the cause of various asbestos-related diseases; causation; and, asbestos medicine in general. Such testimony is expected to be based on his review of Plaintiffs' medical records, pathology materials, x-rays, any and all deposition transcripts, documents produced in discovery and published and unpublished reports.

Dr. Churg further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Churg further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**13. John E. Craighead, M.D.
1845 Four Winds Road
Ferrisburgh, Vermont 05456
(802) 425-3480**

Dr. Craighead is a pathologist with the Department of Pathology, University of Vermont, College of Medicine in Burlington, Vermont, whom Reynolds may call to testify at the trial of this matter, either live or by deposition. His testimony may include, but is not limited to, the nature of asbestos and asbestos-related diseases generally; the nature and extent of any disease or injury which Plaintiffs Barnech and Marroquin may have; the history of evolution and knowledge of asbestos-related diseases; the issues of causation – or lack thereof – between any alleged exposure to asbestos fibers and the medical condition of the Plaintiff; and, the relative importance of various fiber types and the cause of various asbestos-related diseases; and, asbestos medicine in general. Such testimony is expected to be based on his review of Plaintiffs Barnech's and Marroquin's medical records, pathology materials, x-rays, any and all deposition transcripts, documents produced in discovery and published and unpublished reports.

Dr. Craighead further may testify generally concerning the history of scientific knowledge, research and study of exposure to asbestos and its effects on the human body; as to all medical state of the art issues; as to his expert opinion as to levels of asbestos exposure required to cause disease and the basis for such opinions; as to exposure to asbestos in regard to

development of respiratory diseases; and, as to the effects, or lack thereof, of exposure to various types of asbestos fibers.

Dr. Craighead further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

**14. Joseph Falcon, P.E.
J.A. Falcon & Associates
Consulting Power Engineers
17155 Roundhill Drive
Huntington Beach, California 92649
(714) 846-3862**

Mr. Falcon is a mechanical engineer whom Reynolds may call to offer expert testimony at the trial of this matter. He has personal knowledge of relevant facts, but is also an expert based upon his specialized knowledge, skill and training.

Mr. Falcon may testify based upon his knowledge, education, training and experience working in engineering and construction. Mr. Falcon's expert opinions also may be based on his construction design documents, including, but not limited to, a variety of historical specifications for industrial facilities. Mr. Falcon further may rely on any and all pleadings in this matter, deposition transcripts and documents produced in discovery.

Mr. Falcon may testify generally as to the history of the industrial equipment used at Reynolds' Sherwin and San Patricio facilities. He may also address the design, layout and construction of alumina and aluminum reduction plants, the insulation of various pieces of plant equipment, including steam lines, heat transfer systems and turbines, the types of insulation used,

and asbestos content. He may also discuss the roles and responsibilities of the various crafts involved in the plant, including, but not limited to, the insulating craftsmen, and the manhours, the numbers and their duties during the various stages of construction of the plant. He may testify about whether thermal insulation used in conjunction with various equipment would have been asbestos up to and including the time period relevant to this litigation.

He further can testify about the relationship between the owner, general contractor and subcontractors and the responsibility for health and safety of workers – specifically, that the general contractor had responsibility for the overall safety program of the jobsites, and that the subcontractors, in turn, had the responsibility to ensure the safety of their own workers. He further can testify that insulating craftsmen were experts in their field and had superior knowledge as to any potential health hazards associated with exposure to asbestos fibers.

Mr. Falcon further may address any other matters raised by any expert who testifies at trial, including expert witnesses called by the Plaintiffs or by any codefendant, and the import of any exhibit introduced as evidence, or any items prepared for use or used for demonstrative purposes by any witnesses.

- 15. Reynolds reserves the right to offer as an expert witness any of the physicians, nurses or other medical and/or psychological professionals who have either treated or diagnosed Mr. Barneec and Mr. Marroquin or consulted with any such treating professional.**
- 16. Any and all expert witnesses identified by Plaintiffs or any codefendant.**
- 17. Reynolds reserves the right to designate additional expert witnesses for rebuttal or any other purpose.**
- 18. Reynolds reserves the right to designate an economic expert should the Plaintiffs designate an economic expert to testify at trial.**

II

Witnesses Capable of Offering Both Lay and Expert Testimony

1. **Homer M. Cole**
Reynolds Metals Company
6601 West Broad Street
Richmond, VA 23230

Homer Cole is the Corporate Director of Industrial Hygiene and Toxicology at Reynolds Metals Company. He has been an industrial hygienist at Reynolds since 1972. He is familiar with the workings of reduction plants and the potential for exposure to occupational hazards, including asbestos fibers. He performed industrial hygiene surveys at the San Patricio plant and may testify regarding such surveys as well as other factual matters based on his personal experience and knowledge. Mr. Cole will testify as a factual witness, but because he qualifies as an expert, he may offer expert testimony in the fields of industrial hygiene, occupational and environmental health and safety, state-of-the art, governmental regulations of workplace exposures, threshold limit values, the measurement of occupational asbestos exposures as well as other potential occupational hazards, respiratory protection, and proper work practices.

2. **Ronald Benton**
Reynolds Metals Company
6601 West Broad Street
Richmond, VA 23230

Mr. Benton is Manager of Industrial Hygiene and Safety Services at Reynolds Metals Company. He has been an industrial hygienist at Reynolds since 1974. He performed industrial hygiene surveys at the San Patricio plant and may testify regarding such surveys as well as other

factual matters based on his personal experience and knowledge. Mr. Benton may testify as a factual witness, but because he qualifies as an expert, he may offer expert testimony in the fields of industrial hygiene, occupational and environmental health and safety, state-of-the art, governmental regulations of workplace exposures, threshold limit values, the measurement of occupational asbestos exposures as well as other potential occupational hazards, respiratory protection, and proper work practices.

3. **E. Claiborne Irby, M.D.**
Reynolds Metal Company
11-1/2 Tapoan Road
Richmond, VA 23226

Dr. Irby is the retired Corporate Medical Director for Reynolds Metals Company. He held that position from 1977 until his retirement in 1992. He began with Reynolds in 1959 as a staff physician. He may be called as a factual witness but because he qualifies as an expert, he may offer expert testimony in the fields of occupational medicine, state of the art, governmental regulations, and medical issues in general as they may relate to occupational asbestos exposures.

REYNOLDS METALS COMPANY

By: 

David Craig Landin (Texas Bar No. 11863720)
John D. Epps (Texas Bar. No. 00796079)
HUNTON & WILLIAMS
951 East Byrd Street
Riverfront Plaza, East Tower
Richmond, Virginia 23219
(804) 788-8200
(804) 788-8218 (facsimile)

R. Clay Hoblit (Texas Bar No. 09743100)
CHAVES, GONZALES & HOBLIT, L.L.P.
2000 Frost Bank Plaza
202 North Carancahua
Corpus Christi, Texas 78470
(512) 888-9392
(512) 888-9187 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2000, a true and correct copy of the above and foregoing instrument is being served by facsimile and certified mail, return receipt requested, on the following

Plaintiffs' counsel:

Stephanie A. Finch, Esq.
Baron & Budd, P.C.
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

All other known counsel of record are given notice of this pleading only by regular United States mail.