

CAUSE NO. 00-2721-H

GONSALO CARILLO, et al.,

Plaintiffs,

v.

GAF CORPORATION (successor to
RUBEROID CORPORATION), et al.,

Defendants.

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IN THE DISTRICT COURT

NUECES COUNTY, TEXAS

347th JUDICIAL DISTRICT**DEFENDANT REYNOLDS METALS COMPANY'S RESPONSES TO
PLAINTIFF'S REQUEST FOR RULE 194 REQUEST FOR DISCLOSURE**

TO: Plaintiff, LUIS VERA, by and through his attorney of record, Stephanie Finch,
Esq., Baron & Budd, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219

Defendant Reynolds Metals Company ("Reynolds"), by counsel, pursuant to Rule 194 of the Texas

Rules of Civil Procedure, responds as follows to Plaintiff's Request for Disclosures:

A. The correct names of the parties to the lawsuit.

Reynolds states that its correct name is Reynolds Metals Company; it is without knowledge as to the correct names of the other parties to the lawsuit.

B. The name, address, and telephone number of any potential parties.

At this time, Reynolds is aware not aware of any "potential parties." Reynolds reserves the right to supplement its response to this request.

C. The legal theories and, in general, the factual bases of the responding party's claims.

Reynolds refers plaintiff to its Special Exceptions, Original Answer and Affirmative Defenses to Plaintiffs' Original Asbestos Petition Subject to Reynolds' Motion to Transfer venue to San Patricio.

County and its Motion to Sever or Drop. At this time, Reynolds expects that its defense will be based on documentary and testimonial evidence (including lay and expert testimony) that:

- Plaintiffs' claims against Reynolds are barred by the statute of limitations;
- Plaintiff Vera was not exposed to harmful levels of airborne asbestos fibers on any premises owned, operated and/or controlled by Reynolds;
- Plaintiff Vera has no asbestos-related illness or injury;
- Reynolds did not owe a legal duty to protect Plaintiff Vera against hazards incident to his work;
- Plaintiff Vera and/or his employer – who marketed and sold asbestos-containing products to Reynolds and installed those products – were in a superior position to know about and protect against potential health hazards associated with the inhalation of airborne asbestos fibers;
- Reynolds was not negligent; and
- Plaintiff Vera was contributorily negligent.
- If Plaintiff Vera was exposed to harmful levels of asbestos while on Reynolds' property, such exposure resulted from the acts of other persons or entities for which Reynolds was not legally responsible.

D. The amount and any method of calculating economic damages.

At this time, Plaintiffs have not disclosed the amount of damages they seek nor the method of calculating such damages. Although Reynolds generally denies that grounds exist for damages, Reynolds cannot respond specifically to plaintiffs' claimed damages and/or damage calculation. Reynolds therefore reserves the right to supplement its response to this Request until such time as plaintiff has provided this information.

E. The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

Investigation and discovery is ongoing in this matter, and, at this time, Reynolds does not know each and every individual who has knowledge of the relevant facts, nor does Reynolds know at this time whom it may call to testify at the trial of this matter. Reynolds therefore reserves the right to supplement its response to this Request in accordance with Rule 193 of the Texas Rules of Civil Procedure. At this time, Reynolds identifies the following individuals who may have knowledge of relevant facts and who Reynolds may call to testify at the trial of this matter:

1) **Plaintiffs**

(a) Luis Vera

(b) Zulema R. Vera

2) **Any and all Family Members of the Plaintiffs.** This includes, but is not limited to, Santos Ricio and Rene R. Vera.

3) **Plaintiff Vera's Treating Physicians.** Reynolds may any or all of Plaintiff Vera's treating physicians as trial witnesses to offer testimony, including expert testimony, about their care treatment and diagnosis of Plaintiff Vera. At this time, Reynolds names the following physicians identified in Mr. Vera's Answer to Interrogatories:

(a) Dr. Pete Garcia
Medical Tower
Corpus Christi, TX

(b) Dr. Gilberto Sosa
605 East Caesar Avenue
Kingsville, TX

(c) Dr. Sergio Tavares
613 Elizabeth Street, #302
Corpus Christi, TX

- (d) **Dr. David Gray**
7121 South Padre Island, Drive
#102
Corpus, Christi, TX
- (e) **Dr. Stephen Turner**
613 Elizabeth Street, #302
Corpus Christi, TX

4) **Coworkers.** Reynolds may call Plaintiff Vera's coworkers as trial witnesses. Reynolds reserves the right to supplement its response to this request when Plaintiff has identified the names and addresses of his coworkers.

- (a) **Eduardo Rodriquez**
- (b) **Lupe Flores**

5) **Reynolds Personnel/Witnesses.**

(a) **San Patricio Reduction Plant Personnel.** Reynolds may call some or all of the following individuals who were employed at various times at the San Patricio Reduction Plant to testify as to their personal knowledge concerning plant operations and plant conditions; the use of asbestos containing products in plant operations; the elimination and abatement of asbestos; Reynolds' safety procedures, both in general and as they relate to asbestos (including the use of respirators); Plaintiff Vera's potential for asbestos exposure from installing products at Reynolds' plants; and, other matters relevant to plaintiff's claims and/or Reynolds' defenses:

Robert Dale Gamble, M.D.
5301 St. Andrew
Corpus Christi, Texas 78413

(512) 991-2985

Dr. Gamble was the San Patricio Reduction Plant and/or Sherwin Alumina Plant Medical Director from 1975-85. He has knowledge regarding the Respiratory Surveillance Program at the San Patricio Reduction Plant. He also may have knowledge of Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may have knowledge related to asbestos exposure procedures.

Harry R. Bratt, M.D.
2040 Birch Ave.
Saint Helena, CA 94574

Dr. Bratt was the San Patricio Reduction Plant and/or Sherwin Alumina Plant Medical Director from 1971-75. He has knowledge regarding the Respiratory Surveillance Program at the San Patricio Reduction Plant. He also may have knowledge of Reynolds' safety procedures in general, as well as specific safety procedures as they relate to asbestos. He may have knowledge related to asbestos exposure procedures.

Mr. E. W. Dressen
221 Blanco
Portland, Texas 78374
(512) 643-2104

Mr. Dressen was the an Engineer and Reduction Superintendent at the San Patricio Reduction Plant. He also was the acting plant manager of the San Patricio Reduction Plant from 1974-79 and from 1981 until the plant closed. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; and Reynolds' attitude toward safety and employee health in general.

Kenneth E. Murphree
458 Caroline Acres Point
Hot Springs, Arkansas 71913
(501) 525-3726

Mr. Murphree was the plant manager of the San Patricio Reduction Plant from 1979-81. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

William E. Campbell
7746 East Laguna Azul

**Apartment #272
Mesa, Arizona 85208
(602) 357-9978**

Mr. Campbell was the plant manager of the San Patricio Reduction Plant from 1972-'77. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

**Mr. Harry V. Helton
509 Kilmarnock Drive
Richmond, Virginia 23229
(804) 740-7705**

Mr. Helton was employed at the San Patricio Reduction Plant from 1966-72 and held positions as potroom supervisor, general plant supervisor and, from 1971-72, plant manager. He may have knowledge regarding plant operations; various applications of asbestos-containing products throughout the plant; the use, elimination and/or substitution of asbestos-containing products; Reynolds' attitude toward safety and employee health in general; and other relevant information.

**Mr. Clyde Doyce Hester
546 Evergreen Drive
Corpus Christi, Texas 78412**

Mr. Hester was the chief chemist at the San Patricio Reduction Plant from 1953-89. He may have general knowledge about the plant processes, environmental issues (including asbestos abatement issues) and other information.

**Mr. Allen G. Hill
418 Ferick Avenue
Taft, Texas 78390-2808
(512) 528-2749**

Mr. Hill was a chemist at the San Patricio Reduction Plant from 1967-85. He may have general knowledge about the plant processes, environmental issues (including asbestos abatement issues) and other information.

**Mr. William D. Pipes
P.O. Box 148
Crozier, Virginia 23039
(804) 784-1250**

Mr. Pipes held the following titles at the San Patricio Reduction Plant from 1966-77: process engineer, power plant supervisor; and maintenance superintendent. He also was the plant engineer from 1979-82. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Kenneth W. Younger
12604 Hardings Trace Court
Richmond, Virginia 23233
(804) 281-4111

Mr. Younger was a project engineer at the San Patricio Reduction Plant from 1970-71 and 1980-85. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Brice G. Nelson
1045 Wilshire
Corpus Christi, Texas 78411
(512) 852-4535

Mr. Nelson was involved in the original construction and operation of the carbon plant at the San Patricio Reduction Plant, and he worked at the San Patricio Reduction Plant from approximately 1951-69, and from 1974-76. He may have knowledge regarding the construction and processes of the San Patricio Reduction Plant in general, the availability and use of personal protective equipment, general health and safety issues and applications of asbestos products at the plant.

Mr. Raymond L. Bennett
414 Reynolds Avenue
Taft, Texas 78390
(512) 528-3284

Mr. Bennett was the power plant supervisor at the San Patricio Reduction Plant from approximately 1953-84. He may have knowledge regarding plant operations in general and the operation of the power plant in particular. He also may have knowledge regarding applications of asbestos products in the power plant.

Mr. John L. Massey
P.O. Box 73
Bayside, Texas 78340
(512) 529-6692

Mr. Massey was a foreman in the San Patricio Reduction Plant maintenance department from approximately 1952-88. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment, general health and safety issues and other relevant information.

Mr. James C. Black
224 Bafanridge Drive
Hot Springs, AR 71901
(501) 624-7244

Mr. Black was employed at the San Patricio Reduction Plant as a potroom foreman from 1960-63. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

Mr. Clyde A. Krueger
131 Granby
Portland, Texas 78374
(512) 643-2421

Mr. Krueger was a general foreman at the San Patricio Reduction Plant from 1952-81. He may have general knowledge about the plant processes, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues.

Mr. William E. Shepp
244 Ross Road
Kelso, Washington 98626
(360) 578-2429

Mr. Shepp was a potroom engineer and casthouse supervisor at the San Patricio Reduction Plant. He may have knowledge about the use and application of asbestos-containing products, elimination and/or substitution of asbestos-containing products, general health and safety issues and other relevant information.

Mr. Harold L. Bern, Jr.
2341 East Lynnwood Drive
Longview, Washington 98632
(206) 425-8082

Mr. Bern was the Personnel Manager at the San Patricio Reduction Plant from 1979-82 and may have knowledge about information relevant to this lawsuit.

Mr. Joel W. Whitlock
6837 SE Cottrell Road
Gresham Oregon 97080-8911
(503) 663-2096

Mr. Whitlock was employed at the San Patricio Reduction Plant from 1958-71 and, during that time, held the following titles and positions: potroom general clerk; potroom foreman; anode foreman; pot relining supervisor; maintenance supervisor and plant safety engineer. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

Mr. Jack H. Norris, Jr.
4318 St. George
Corpus Christi, Texas 78413
(512) 853-1021

Mr. Norris was a purchasing agent at the San Patricio Reduction Plant from 1976-86 and plant purchasing manager from 1986-88. He may have knowledge about the purchase, use and application of asbestos-containing products and/or substitutes for asbestos-containing products, the purchase and use of safety equipment (including respirators), asbestos abatement and other relevant information.

Richard C. Easterline
15 Serra Lane
Massena, New York 13662
(315) 769-1996

Mr. Easterline was employed at the San Patricio Reduction Plant from 1968-82 and held positions as an engineer and carbon services supervisor. He may have general knowledge regarding plant operations, the use and application of asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

John W. Ford
c/o Reynolds International
P.O. Box 27002
Richmond, Virginia 23261
(503) 666-0203

Mr. Ford was the plant maintenance supervisor at the San Patricio Reduction Plant from 1979-83. He may have general knowledge regarding plant operations, the use and application of

asbestos-containing products, the availability and use of personal protective equipment and general health and safety issues, and other relevant information.

(b) **Reynolds Corporate Personnel.** Reynolds may call some or all of the following individuals to testify regarding their personal knowledge on matters of safety, medical and industrial hygiene issues on the corporate level and/or at the Sherwin and/or San Patricio plants specifically; plant operations and conditions; the use, elimination and/or substitution of asbestos-containing products; and, on other matters relevant to plaintiff's claims and/or Reynolds' defenses:

Dr. Woolson W. Doane
14 Runswick Drive
Richmond, Virginia 23233-5413

Dr. Doane was Reynolds' Corporate Medical Director from 1993-June 1997. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin and San Patricio plants.

David Warren, M.D.
8705 Tarytown Drive
Richmond, Virginia 23229

Dr. Warren was the acting Corporate Medical Director from 1992-93. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin and San Patricio plants.

E. Claiborne Irby, M.D.
11-1/2 Tapoan Road
Richmond, Virginia 23226

Dr. Irby was an Associate Corporate Medical Director from 1959-77, and Corporate Medical Director for Reynolds from 1977 until his retirement in 1992. He may be called as a factual witness, but because he also 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.

James MacMillan, M.D.
306 Gunby Drive
Richmond, Virginia 23229

Dr. MacMillan was the Corporate Medical Director of Reynolds from 1956-77. He may be called to testify about his knowledge concerning corporate medical issues and the Respiratory Surveillance Program at the Sherwin and San Patricio plants.

Mr. Homer Mac Cole
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230
(804) 281-3506

Mr. Cole is the Corporate Director of Industrial Hygiene and Toxicology at Reynolds. He has been an industrial hygienist at Reynolds since 1972. Mr. Cole performed industrial hygiene surveys at the Sherwin and San Patricio plants and may testify regarding such surveys as well as other factual matters based on his personal experience and knowledge, including, but not limited to, plant conditions, various uses of asbestos-containing products in plant applications, the elimination and substitution of asbestos-containing products, and general issues related to industrial hygiene and safety. Although Mr. Cole will testify as a factual witness, he qualifies as an expert and may offer expert testimony in the fields of industrial hygiene, occupational 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.

Mr. Ronald E. Benton
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Mr. Benton is Manager of Industrial Hygiene and Safety Services at Reynolds. He has been at Reynolds since 1974. He performed industrial hygiene surveys at Sherwin and San Patricio 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.

Ms. Linda Mailer
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Ms. Maillet was the Regional Industrial Hygienist at the Corporate Headquarters of Reynolds for the Eastern Region. She is currently the Principal Health, Safety and Regulatory Affairs Scientist at the Corporate Headquarters.

Ms. Laurie Shelby
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

Ms. Shelby was the Manager of Industrial Hygiene Programs at the Corporate Headquarters of Reynolds. She is currently the Manager of Health and Safety Programs.

Mr. Richard Mansur
1416 Coronet Drive
Richmond, Virginia 23229-4806
(804) 282-4438

Mr. Mansur was the Manager of the Industrial Hygiene Department at the Corporate Headquarters of Reynolds from 1969-75.

Mr. James D. Davidson

Mr. Davidson was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1976-82.

Ms. Stacey Hansen
12701 Mirror Pond Way
Midlothian, Virginia 23113
(804) 794-1736

Ms. Hansen was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1990-93.

Mr. Dale Prokopchak
2704 Empress Court
Richmond, Virginia 23233
(804) 360-3301

Mr. Prokopchak was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1988-89.

Ms. Deborah R. Hudgins

Ms. Hudgins was a Staff Industrial Hygienist at the Corporate Headquarters of Reynolds from 1984-88.

Mr. Harry L. Skalsky
6910 West Grace Street
Richmond, Virginia 23261

Mr. Skalsky was a Medical Corporate Toxicologist at the Corporate Headquarters of Reynolds 1979-85.

Ms. Karen Kestle
1336 Merrymeade Avenue
Glen Allen, Virginia 23060
(806) 264-1789

Ms. Kestle was the Senior Insurance Administrator at the Corporate Headquarters of Reynolds.

Mr. Bobby J. Sasser

Mr. Sasser was the Corporate Safety Director for Reynolds from 1973-95.

Mr. Joseph Nichols
2300 Cedarfield Parkway
Apartment 161
Richmond, Virginia 23233
(804) 282-8245

Mr. Nichols was the Corporate Safety Director for Reynolds from 1945-73.

(c) Other Reynolds' Witnesses

Alex Baca
Baca Safety Consulting
6214 Battery Lane
San Antonio, Texas 78233
(210) 657-0705

Mr. Baca is a retired inspector for the United States Department of Labor Mine Safety and Health Administration. He was a Federal Mine Safety and Health Inspector from 1975 until January, 1998 with duties to enforce the Safety and Health Regulations on Mining Operations and to gain compliance with such regulations. Pursuant to this position, Mr. Baca inspected

the Sherwin Alumina Plant. Mr. Baca may testify regarding such inspections as well as to other factual matters based on his personal experience and knowledge.

Robert E. Ruckstuhl
Proactive Safety Consultants Company, Inc.
Post Office box 260955
Corpus Christi, Texas 78426-0955
(512) 767-1663

Mr. Ruckstuhl is a consultant who specializes in the area of asbestos safety and training. He has performed consulting functions and training seminars related to asbestos safety and asbestos abatement issues at the Sherwin Alumina Plant and may testify regarding such consulting services and training seminars as well as other factual matters based on his personal experience and knowledge.

6) **Records Custodians.** Reynolds may call, live or by deposition or affidavit, various records custodians to authenticate relevant records, including, but not limited to, the records of Mr. Vera's medical care providers and the records of his employers. These individuals may include the following institutions:

- (a) **Spohn Health Systems**
605 East Caesar Avenue
Kingsville, TX
- (b) **Kingsville Medical Center**
227 West Kleberg Avenue
Kingsville, TX

7) **Other Parties' Witnesses.** Reynolds reserves the right to call and/or elicit testimony from any individual identified by plaintiff and any other party to this lawsuit and, accordingly, will supplement its response to this request when those individuals have been identified.

8) **Rebuttal/Impeachment Witnesses.** Reynolds reserves the right to call rebuttal and/or impeachment witnesses and will supplement its response to this request if and when it has sufficient information to determine the need for such testimony.

F. For any testifying expert:

- (1) The expert's name, address, and telephone number;**
- (2) The subject matter on which the expert will testify;**
- (3) The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;**
- (4) If the expert is retained by, employed by, or otherwise subject to the control of the responding party:**
 - (A) All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and**
 - (B) The expert's current resume and bibliography.**

Pursuant to Rule 195 of the Texas Rules of Civil Procedure, Reynolds refers plaintiffs to its designation of Expert Witnesses that will be filed in accordance with the scheduling order of this court and the Texas Rules of Civil Procedure.

G. Any discoverable indemnity and insuring agreements.

Reynolds has insurance coverage sufficient to cover plaintiffs' claims with the following insurance companies:

Reynolds has insurance coverage sufficient to cover plaintiff's claims with the following insurance companies:

- Travelers Insurance (9/30/53 through 9/30/66)
- Liberty Mutual Group (9/30/66 through 9/30/78)

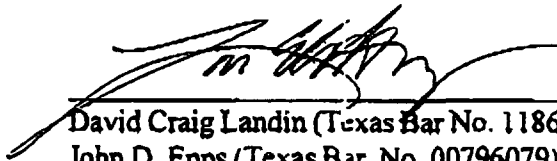
I. Any discoverable witness statements.

None.

K. All medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

Subject to plaintiff's agreement to pay Reynolds one-half of its cost in retrieving these records, Reynolds will produce these records at \$.15 per page or will make them available to plaintiff's counsel for inspection and copying at a mutually convenient time and place.

REYNOLDS METALS COMPANY,



David Craig Landin (Texas Bar No. 11863720)

John D. Epps (Texas Bar. No. 00796079)

Eric G. Reeves (Texas Bar No. 24026170)

Lori Elliott Guzman (Texas Bar No 24011471)

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)

Adam C. Cortez (Texas Bar No. 04844650)

CHAVES, GONZALES & HOBLIT, L.L.P.

2000 Frost Bank Plaza

202 North Carancahua

Corpus Christi, Texas 78470

(512) 888-9392

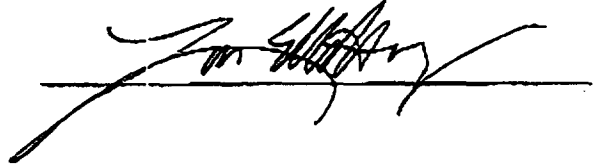
(512) 888-9187 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on March 17th, 2001, a true and correct copy of the above and foregoing instrument is being served by certified mail, return receipt requested, on the following Plaintiffs' counsel:

Stephanie Finch
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 by regular United States mail only





RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
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March 29, 2001

FILE NO: 50684 W

VIA TELECOPY

W. Hugh Bartlett
Legal Assistant
Baron & Budd
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219-4281

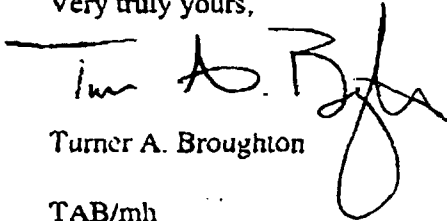
Re: Gonzalo Carillo, et al. v. GAF Corporation, et al.

Dear Hugh:

Thank you for your letter of March 28, 2001. However, I am confident you already are in receipt of our discovery responses. These documents were enclosed with the letter sent via certified mail, receipt no. 7000 0600 0022 0904 2037. Because Stephanie's name appeared in duplicate on our service list she, along with all other counsel of record, was also sent a copy of the letter without enclosures. It is the second letter to which I believe your correspondence refers. However, I am attaching a copy of the discovery we served previously.

I hope all is well and please call me if you have any questions or concerns.

Very truly yours,



Turner A. Broughton

TAB/mh

Attachments

cc: Stephanie A. Finch, Esq