

CAUSE NO. 99-02242-K

LEROY A. BOEHL, ET AL

VS.

OWENS CORNING, ET AL

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

192ND JUDICIAL DISTRICT

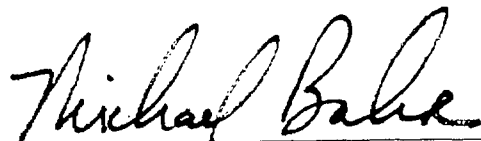
**DEFENDANT MOBIL OIL CORPORATION'S THIRD
SUPPLEMENTAL RESPONSE TO PLAINTIFF'S REQUEST FOR DISCLOSURE**

TO: Plaintiff, Julius M. Honeycutt, et al by and through their attorney of record, Stephanie Finch, BARON & BUDD, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

COMES NOW, MOBIL OIL CORPORATION, one of the Defendants in the above styled cause, and pursuant to Rule 194.3 of the Texas Rules of Civil Procedure, files the following Third Supplemental Response to Plaintiff's Request for Disclosure. This supplemental disclosure is intended as an addition to Mobil Oil Corporation's previously filed First and Second Supplemental Response to Request for Disclosure.

Respectfully submitted,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.



David W. Ledyard
State Bar No. 12109400

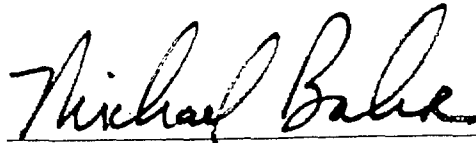
Michael L. Baker
State Bar No. 01586100

14th Floor, San Jacinto Building
Beaumont, Texas 77701-3255
(409)981-1000
(409)981-1010 Facsimile

ATTORNEYS FOR DEFENDANT
MOBIL OIL CORPORATION

CERTIFICATE OF SERVICE

This will verify that a true and correct copy of Mobil Oil Corporation's Third Supplemental Response to Plaintiffs' Request for Disclosure has been furnished to counsel for plaintiff, by certified mail, return receipt requested, and to all other known counsel of record by regular U.S. Mail, on this the 30th day of July, 2001.

A handwritten signature in black ink, reading "Michael Baker", written over a horizontal line.

Michael L. Baker

THIRD SUPPLEMENTAL RESPONSE TO REQUEST FOR DISCLOSURE

194.2(f) For any testifying expert:

1. the experts name, address, and telephone number;
2. the subject matter on which the expert will testify;
3. the general substance of the experts mental impressions and opinions and a brief summary of the bases 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; and
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.

RESPONSE:

In addition to Defendant Mobil Oil Corporation's First and Second Supplemental Responses to Plaintiff's Request for Disclosure previously filed in this cause of action, Defendant incorporates by reference as if fully listed herein and the attached designation.

Gerhard K. Raabe, Dr.P.H., F.A.C.E.
Health Risk Sciences, Inc.
P. O. Box 189
New Hope, PA 18938
(215) 862-5718

Dr. Raabe is former Director of Epidemiology and Medical Information and Health Risk Assessment for Mobil. He is currently a private consultant in the field of epidemiology and health risk assessment. Dr. Raabe has knowledge regarding the medical, scientific and epidemiological literature related to ExxonMobil's Beaumont Refinery and Olefins-Aromatics Plant. Dr. Raabe will describe these studies and will testify regarding findings from these studies and their relevance to the alleged exposures in this case.

See CV of Dr. Raabe attached as Exhibit A.

CURRICULUM VITAE

Gerhard K. Raabe, Dr.P.H., F.A.C.E.
Office # 215-862-5718 FAX # 215-862-3551
E-Mail: GKRaabe@cs.com

PERSONAL

Birth Date: 1948
Marital Status: Married - 2 children
Military Status: Captain USAR Medical Service Corps (inactive)
Citizenship: USA

BOARD CERTIFICATION

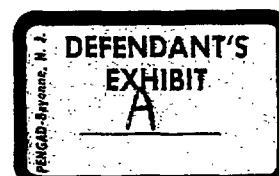
Fellow, American College of Epidemiology - 1996

EDUCATION

Bachelor of Arts Hofstra University (June 1969)
Major: Biology Minor: Mathematics
Master of Science Pratt Institute (June 1971)
Specializations: Computer Science, Scientific Applications
Doctor of Public Health Columbia University (January 1987)
Specializations: Epidemiology, Statistics, Research
Methods, Sociomedical Science

SUPPLEMENTAL EDUCATION

Industrial Hygiene Monitoring - 1978
Mobil Oil Corporation
Occupational Reproductive
Health Research - 1983
RMCOEH - University of Utah
Financial Management and Accounting - 1984
The Wharton School
Risk Analysis in Environmental
and Occupational Health - 1987
Harvard School of Public Health
Survival Analysis - 1996
Mayo Clinic



PROFESSIONAL BACKGROUND

12/99 -	<u>President and Principal Scientist</u> Health Risk Sciences, Inc. P. O. Box 189 New Hope, PA 18938 Consulting in occupational, and environmental epidemiology, product safety, and other health risk assessment activities.
12/99 - 2/2000	ExxonMobil Biomedical Sciences, Inc. - Transition Activities
1/96 - 12/99	<u>Director - Medical Information and Health Risk Assessment</u> Mobil Business Resources Corporation Global Medical Services Medical Information and Health Risk Assessment P.O. Box. 189 New Hope, PA 18938 Responsible for worldwide strategy for health risk assessment of Mobil products and processes. Directs medical information services to monitor the health of employees and the public, including statistical and epidemiologic services. Represents Mobil on issues concerning the health effects of Mobil products and processes.
2/90 -12/95	<u>Director - Epidemiology and Medical Information Services</u>
1/82 - 1/90	<u>Manager - Epidemiology and Medical Information Services</u> Responsible for planning, direction and analyses for epidemiology research programs Mobil conducts or participates in. Directs medical information services including medical systems to monitor the health of employees and provides health risk assessments of Mobil products and processes. Represents the Corporation in contacts with governmental and other outside agencies, regarding health effects studies.

PROFESSIONAL BACKGROUND (Continued)

10/79 - 12/81

Industrial Medical Advisor

Previous duties expanded to include coordination of Medical affairs with Industrial Hygiene, and Environmental Affairs and Toxicology Divisions.

10/77 - 9/79

Medical Systems Analyst

Responsible for analysis of medical statistics from worldwide operations. Advise Medical Director on results of medical surveillance and health programs concerning environmental health hazards.

Provides project leadership for epidemiologic research conducted by department.

Particular emphasis was the development of a computerized system for medical surveillance that would relate chemical exposures in the workplace with results of medical surveillance.

3/70 - 10/77

Senior Research Scientist (Biometrics & Computer Science)
New York State Department of Mental Hygiene, Epidemiology of Mental Disorders Research Unit, Columbia University School of Public Health.

In conjunction with other senior-level staff conducted health related research on small areas of New York City. This included the collection and preparation of large-scale data sets, a thorough knowledge of statistical analysis and general consultation on problems of conceptualization, measurement and research design. Served in an education and supervisory capacity for students and supporting staff..

8/69 - 3/70

Graduate Assistant
Pratt Institute

OTHER PROFESSIONAL ACTIVITIES

Reviewer for various Journals (Journal of Occupational and Environmental Medicine, British Journal of Industrial Medicine, Occupational and Environmental Medicine, Environmental Health Perspectives)

- | | |
|---------|---|
| 1973 | U.S. Army Academy of Health Sciences, System Design and Analysis Division. Responsible for systems analysis of procedural review of several large computer simulation models, including statistical updating of the models. |
| 1973-77 | Special Studies Project of Cornell University Medical Center. Developed statistical design and computer programming for large clinical drug efficacy studies. |
| 1976 | City of New York Health System Agency (HSA). Developed health and demographic profiles for NYC Health areas and Community Planning Districts to assist the HSA in preparation of health care needs assessment. |
| 1979-85 | Florida Phosphate Council, Chairman - Occupational Health Committee. Supervised the conduct of their industry -wide occupational mortality study. |
| 1988 | American Petroleum Institute Representative to the International Agency For Research on Cancer (IARC) Monograph meeting on petroleum products. |
| 1989 | Session moderator at the International Conference On Ethics In Epidemiology. |
| 1989 | Member of the U.S. Environmental Protection Agency's (EPA) Expert Panel on the recommended use of human evidence in carcinogen risk assessment. |
| 1990-97 | Member of the Advisory Committee for the Center for Risk Analysis of Harvard University. |
| 1991 | International Symposium on the Health Effects of Gasoline conference organizer and monograph editor. |

PROFESSIONAL BACKGROUND (Continued)

1991	CONCAWE and American Petroleum Institute Representative to the WHO International Programme on Chemical Safety Monograph meeting on Environmental Health Criteria for Benzene.
1994	Member of the International Life Sciences Institute (ILSI)/US-EPA Monograph workgroup on the Use of Meta-Analysis in Environmental Epidemiology.
1995	Member of the US-EPA Expert Panel to provide guidance on the feasibility and design of epidemiologic studies among populations exposed to MTBE.
1995	Member of the ILSI / US- EPA Workgroup on the implications of human variability for cancer risk assessment.
1998	Member of the Advisory Board of the Health Effects Institute Particulate Matter Reanalysis Project.
1998	Member of the Expert Panel convened by the Annapolis Center to discuss Epidemiology and the Law.
1998	Member of the US-EPA Expert Panel to develop guidance on the use of dermal exposure in risk assessment.
1999	CONCAWE representative to the WHO/IPCS Working Group on Accepting Epidemiological Evidence for Health Impact Assessment

TEACHING

1970	<u>Instructor</u> Department of Computer Science Pratt Institute Introduction to Computer Programming
1975-77	<u>Instructor</u> Division of Epidemiology Columbia University School of Public Health Computer Methods in Epidemiology

OTHER

Listed in, Who'sWho in Medicine and Health Care, Who'sWho in Science and Engineering, Who'sWho in America.

Speak fluent German.

MEMBERSHIPS

American College of Epidemiology
Policy Committee 1998-
Society for Epidemiologic Research
International Society for Environmental Epidemiology
American Statistical Association
American Association for the Advancement of Science
New York Academy of Science
American Conference of Governmental Industrial Hygienists
American Industrial Health Council
American Public Health Association
American Petroleum Institute
Health and Environmental Science Department
Chairman, Epidemiology Committee 1985-1988
Research and Science Policy Committee 1988-1990
Health and Product Stewardship Committee 1991-2000
(Chairman 1996-2000)
Health Effects of Oxygenated Fuels Task Force
(Chairman 1991-1999)
Chemical Manufacturers Association
Epidemiology Task Group
Industrial Epidemiology Forum (Chairman - 1991)
International Commission on Occupational Health 1994-
ICOH - Scientific Committee on Occupational Epidemiology 1994-
MEDICHEM - Scientific Committee on Occupational and
Environmental Health in the Chemical Industry 1994-
Society for Risk Analysis

SELECTED PRESENTATIONS

Community Characteristics and Psychiatric Hospitalization . (With Elmer L. Struening, Judith G. Rabkin, Jacob Cohen, Gregory L. Muhlin and Abbott Weinstein.) Presented at the National Conference on Mental Health Statistics, New Orleans, May 1970.

Environmental Attributes Related to Infant Health: A Social Area Analysis . (With Elmer L. Struening, J. G. Rabkin, P. Cohen, G. L. Muhlin and J. Cohen.) Presented at the New York Academy of Sciences, October 1972.

Urban Information Systems - A New York City Experience . (With Elmer L. Struening.) Presented at the American Association for the Advancement of Science Annual Meeting, New York, January 1975.

Status Drift and Rehospitalization Risk: New York City 1969 - 1971 . Presented at the American Psychological Association Annual Meeting, Washington, D. C., September 1976.

The Use of Retrospective and Prospective Industrial Hygiene Characterization in Occupational Epidemiology . Presented at the American Industrial Hygiene Conference, Petroleum Session, Los Angeles, May 1979.

Kidney Cancer Epidemiology in Petroleum Related Studies . Presented at the Workshop on Kidney Effects of Hydrocarbons, American Petroleum Institute, Boston, July 1983.

Epidemiology and Risk Assessment . Presented at the National Conference on Environmental Engineering, Environmental Assessment Session, Boston, July 1985.

Testimony on High Risk Occupational Disease Notification Legislation (S.79 and S.638) . Presented at U.S. Senate Committee on Labor and Human Resources, Subcommittee on Labor, Washington, D.C. March 9, 1987.

Review of Cancer Epidemiology From Exposure to Fuels and Petroleum Refining . Presented at the Science Seminar of the Australia National Occupational Health and Safety Commission, Sidney, October 25, 1988.

Review of Cancer Epidemiology of Petroleum Fuels . Presented at the Collegium Ramazzini Annual Meeting, Carpi, Italy, December 1, 1988.

Review of Studies on the Carcinogenic Potential of Gasoline . Presented at the International Symposium on the Health Effects of Gasoline, Miami, November 6, 1991.

Incorporating Mechanistic Data in Carcinogen Classification Schemes . Presented at the Frontiers in Environmental Health Conference, Storrs, CT, April 23, 1992.

PRESENTATIONS (Continued)

American Petroleum Institute Health Complaint Survey . Presented at the Workshop on Health Effects of MTBE Oxygenated Fuels, Fairfax, VA, July 27, 1993.

Methyl Tertiary Butyl Ether and Other Oxygenated/Octane Enhancers . Presented at the Australian Institute of Petroleum, Melbourne, Australia, November 9, 1993.

Kidney Cancer in Petroleum Exposed Populations . Presented at the National Cancer Institute Workshop on Occupational Exposures and Urogenital Cancers, Rockville, MD, May 23, 1994.

Leukemia Mortality by Cell-Type in Petroleum Workers with Potential Exposure to Benzene . Presented at Benzene '95: International Conference on the Toxicity, Carcinogenesis, and Epidemiology of Benzene, Piscataway, NJ, June 20, 1995

Cell-Type Specific Leukemia Analysis in a Cohort of 208,000 Petroleum Workers . Presented at Epidemiology and Occupational Health 11th International Symposium, The Netherlands, September 7, 1995

Multiple Myeloma and Benzene Exposure in a Multi-National Cohort of More Than 250,000 Petroleum Workers . Presented at The Society of Toxicology 36th Annual Meeting, Cincinnati, OH, March 11, 1997

Preliminary Results of a Meta-Analysis by Cancer Site for a Multi-National Cohort of Petroleum Refinery Workers . Presented at the 6th International Symposium on Epidemiology and Occupational Health Risks, Graz, Austria, April 22, 1998

Contrasting uses of Epidemiologic Data: Benzene and Dioxin . Presented at the American College of Epidemiology Annual Scientific Sessions, Bethesda, Maryland, October 3, 1999

SELECTED PUBLICATIONS

Raabe, G. K.: FACTANAL - Factor Analysis Program Users Manual . Duplicated Report, 1972.

Family, Ethnic and Economic Indicators of Low Birth Weight and Infant Mortality: A Social Area Analysis. (With Elmer L. Struening, J. G. Rabkin, P. Cohen, G. L. Muhlin and J. Cohen.) Annals of the New York Academy of Sciences , Vol. 218, June 1973, pp. 87-107.

A Factor Analytic Study of Attitudes Toward Human Fertility. (With Edward Gaughran, Elmer L. Struening and Gregory Muhlin.) Adult Education , Vol. XXVI No. 2, 1976, pp. 86-100.

PUBLICATIONS (Continued)

Raabe, G. K. and Vallotton, W. W. : An Examination of Lenticular Opacities Among Trimethyl Phosphite Exposed and Non-Exposed Employees . Duplicated Research Report, March 1980.

Raabe, G. K. : Kidney Cancer Epidemiology in Petroleum Related Studies. Renal Effects of Petroleum Hydrocarbons, Princeton Scientific Publishers, Vol. VII, 1984, pp. 259-272.

Raabe, G. K. : A Sociomedical Evaluation of In-House Health Services Provided a Cohort of New Hires . Unpublished Doctoral Dissertation, Columbia University, School of Public Health, New York City, 1987.

Raabe, G. K., Noviello, R., Milcarek, B. I. : A Historical Cohort Study of Mortality Among Employees of Mobil Research and Development Corporation Paulsboro Laboratory, Paulsboro, N.J., Duplicated Research Report, Mobil Corporation, April 29, 1988.

Wong, O. and Raabe, G. K. : A Critical Review of Cancer Epidemiology in Petroleum Industry Employees, With a Meta-Analysis by Cancer Site. Amer. J. Ind. Med., Vol. 15, 1989, pp. 283-310.

Evaluation of the Carcinogenic Risk of Chemicals to Humans - Exposures in Petroleum Refining; Crude Oil and Major Petroleum Fuels. (With Workgroup), International Agency for Research on Cancer, IARC Monograph Vol. 45, Lyon, France, 1989.

Wong, O. and Raabe, G. K. : Proper Interpretation of Meta-Analysis in Occupational Epidemiologic Studies: A Response. , Amer. J. Ind. Med. , Vol. 17, 1990, pp. 273-276.

Ashby, J., et.al. : A Scheme for Classifying Carcinogens. , Reg. Tox. Pharmacol. , Vol. 12, 1990, pp. 270-295.

Beauchamp, T., Cook, R., Fayerweather, W., Raabe, G. K., Thar, W., Cowles, S., Spivey, G. : Ethical Guidelines for Epidemiologists. , J. Clin. Epidemiol. , Vol. 44, Suppl. 1, 1991, pp. 141S-146S.

Collingwood, K., Milcarek, B., Raabe, G. K. : A Retrospective Cohort Mortality Study of Blending and Packaging Workers of Mobil Corporation. , Amer. J. Ind. Med. , Vol. 20, 1991, pp. 343-362.

Guidelines for Good Epidemiology Practices for Occupational and Environmental Epidemiologic Research. (With Task Group), J. Occ. Med. , Vol. 33, 1991, pp. 1221-1229.

Environmental Health Criteria for Benzene. (With Task Group), International Programme on Chemical Safety, World Health Organization, Geneva, Switzerland, EHC 150, 1993.

PUBLICATIONS (Continued)

Raabe, G. K. : Review of the Carcinogenic Potential of Gasoline. Environ. Health Perspect., 101 (Suppl. 6), 1993, pp. 35-38.

Meta-Analysis in Environmental Epidemiology . (With Working Group), ILSI Risk Science Institute, March 1995.

Wong, O. and Raabe, G. K. : Cell-Type Specific Leukemia Analyses in a Combined Cohort of More Than 208,000 Petroleum Workers in the United States and The United Kingdom, 1937-1989. , J. Reg. Tox. and Pharmacology , 21, pp. 207-221, 1995.

Blair, A., Burg, J., Foran, J., Gibb, H., Greenland, S., Morris, R., Raabe, G. K., Savitz, D., Teta, J., Wartenburg, D., Wong, O., Zimmerman, R. : Guidelines for Application of Meta-Analysis in Environmental Epidemiology., J. Reg. Tox. and Pharmacology , 22, pp. 189-197, 1995.

Raabe, G. K. : American Petroleum Institute Health Complaint Survey. Anecdotal Health-Related Complaint Data Pertaining to Possible Exposures to Methyl Tertiary Butyl Ether (MTBE). American Petroleum Institute, Publication 4623, pp. E3-E11, 1995

Collingwood, K. W., Raabe, G. K., Wong, O. : An Updated Cohort Mortality Study of Workers at a Northeastern United States Refinery., Int. Arch. Occup. Environ Health , 68, pp. 277-288, 1996

Wong, O. and Raabe, G. K. : Cell-Type Specific Leukemia Analyses in a Cohort of 208,000 Petroleum Workers. Epidemiology , Vol. 6, No. 4 (supplement): S133.

Acquavella, J. F., Raabe, G. K., Teta, M. J., Chase, G. R. : Disclosure of Interest : A Time for Clarity. Amer. J. Ind. Med. , 28, pp. 609-610, 1995.

Wong, O. and Raabe, G. K. : The Application of Meta-Analysis in Reviewing Occupational Cohort Studies. Occupational and Environmental Medicine , Vol. 53, pp. 793-800, 1996.

Raabe, G. K. and Wong, O. : Occupational Electric and Magnetic Field Exposure and Brain Cancer. Am. J. Occup. Environ. Med. , Vol. 38, No. 7, pp. 655-656, 1996.

Raabe, G. K., and Wong, O. : Leukemia Mortality by Cell Type in Petroleum Workers with Potential Exposure to Benzene. Environmental Health Perspectives. , Vol 104 (supplement 6), pp. 1381-1392, December 1996.

Raabe, G. K., Collingwood, K. W., Wong, O. : An Updated Mortality Study of Workers at a Petroleum Refinery in Beaumont, Texas. American Journal of Industrial Medicine. , Vol 33, pp. 61-81, 1998.

PUBLICATIONS (Continued)

Wong, O., and Raabe, G. K. : Multiple Myeloma and Benzene Exposure in a Multi-national Cohort of More Than 250,000 Petroleum Workers. Regulatory Toxicology and Pharmacology , Vol 26, pp. 188-199, 1997.

Wong, O. and Raabe, G. K. : Acute Myeloid and Monocytic Leukemia and Benzene Exposure in Petroleum Distribution Workers in the United Kingdom. Occupational and Environmental Medicine , Vol 55, pp. 360-362, 1998.

Braithwaite, W., Cole, P., Feinstein, A. R., Green, M. D., Madden, M. S., Ott, M. G., Raabe, G. K., Raul, A. C., Starr, T. B. : Epidemiology in Decision-Making . The Annapolis Center, Center Report 1999.

Bergsagel, D. E., Wong, O., Bergsagel, P. L., Alexanian, R., Anderson, K., Kyle, R. A., Raabe, G. K. : Benzene and Multiple Myeloma: Appraisal of the Scientific Evidence. Blood - Journal of the American Society of Hematology , Vol 94, No. 4, pp. 1174-1182, 1999

Rosamilia, K., Wong, O., Raabe, G. K. : A Case-Control Study of Lung Cancer Among Refinery Workers., J. of Occupational and Environmental Medicine , Vol 41, No. 12, pp 1091-1103, 1999

Accepting Epidemiological Evidence for Environmental Health Impact Assessment , (With Working Group), World Health Organization Regional Office for Europe and International Programme for Chemical Safety, World Health Organization, Geneva, Switzerland, In Press. 1999

Collins, J. J., Barbella, T., Huebner, W. W., Divine, B. J., Schnatter, A. R., Carpenter, A. V., Hearne, F. T., Raabe, G. K., Fayerweather, W. : A Framework for Addressing Health Issues in or Near a Manufacturing Facility., J of Occupational and Environmental Medicine , Vol 42, No. 2, pp 163-170, 2000

Wong, O., and Raabe, G. K. : Non-Hodgkin's Lymphoma and Exposure to Benzene in a Multi-National Cohort of More Than 308,000 Petroleum Workers, 1937-1996., to appear in the Journal of Occupational and Environmental Medicine , 2000

CAUSE NO. 99-02242-K

LEROY A. BOEHL, ET AL

VS.

OWENS CORNING, ET AL

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

192ND JUDICIAL DISTRICT

CERTIFICATE OF WRITTEN DISCOVERY

TO: Plaintiff, Julius M. Honeycutt, et al by and through their attorney of record, Stephanie Finch, BARON & BUDD, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

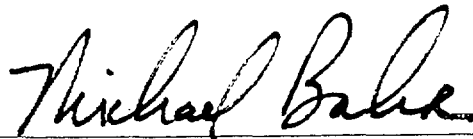
COMES NOW Defendant, Mobil Oil Corporation, and certifies that the following document has been served upon all counsel of record on this the 30th day of July, 2001:

- **Defendant Mobil Oil Corporation's Third Supplemental Response to Plaintiff's Request for Disclosure.**

Respectfully submitted,

STRONG, PIPKIN, NELSON,
BISSELL & LEDYARD, L.L.P.

1400 San Jacinto Building
595 Orleans Street
Beaumont, TX 77701-3255
(409) 981-1000 - TEL
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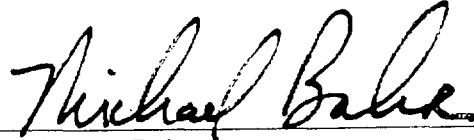
David W. Ledyard
Texas Bar. No. 12109400

Michael L. Baker
Texas Bar No 01586100

ATTORNEYS FOR DEFENDANT
MOBIL OIL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing document have been furnished to all known counsel of record on this the 30th day of July, 2001.

A handwritten signature in black ink, reading "Michael Baker", written over a horizontal line.

Michael L. Baker