

NO. B-126,986

RUSSELL ALLEN, ET AL	§	IN THE DISTRICT COURT OF
	§	
VS.	§	JEFFERSON COUNTY, TEXAS
	§	
AMERICAN PETROFINA, INC.,	§	
ET AL	§	60TH JUDICIAL DISTRICT

DEFENDANT'S RESPONSE TO PLAINTIFFS' SECOND REQUEST FOR PRODUCTION

To: Plaintiffs, by and through their attorney of record, HERSCHEL L. HOBSON, 2190 Harrison, Beaumont, Texas, 77701:

COMES NOW EXXON CORPORATION, Defendant in the above-entitled cause of action, and makes this its Response to Plaintiffs' Second Request for Production as follows:

SEE ATTACHED.

Respectfully submitted,

HAYS, McCONN, PRICE
& PICKERING

By _____
B. STEPHEN RICE
State Bar No. 16838000
400 Citicorp Center
Houston, Texas 77002
(713) 654-1111

STRONG, PIPKIN, NELSON
& BISSELL

By _____
DAVID W. LEDYARD*
State Bar No. 12109400
595 Orleans Street
San Jacinto Building
Beaumont, Texas 77701

Attorneys for Defendant,
EXXON CORPORATION

021116

AUG 30 1990

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was sent certified mail, return receipt requested and/or hand delivery to Herschel L. Hobson, 2190 Harrison, Beaumont, Texas, 77701 and by regular mail to all other known counsel of record on this the 29 day of August, 1990.

B. STEPHEN RICE

*Signed by permission

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Request for Production No. 1: Please produce a copy of your document retention policies this Defendant has used since it began such a policy, but not before 1945. This request seeks sufficient information to determine when a document retention policy began (or if one existed in 1945) what each policy was and each change and when each change became effective.

Objection: This Defendant objects to this request to the extent it would require the production of specialized document retention policies for facilities or operating units other than those facilities or operating units involved in the litigation on the grounds that it is overly broad, unduly burdensome and seeks documentation wholly irrelevant to this case. Subject to and without waiving the above stated objection, this Defendant will produce all available documents relating to corporate-wide retention policies and those utilized at this Defendant's facilities involved in this lawsuit at a mutually agreeable time and place and upon reasonable notice.