

## DEFINITIONS

1. “You” and “your” refers to the person or persons upon whose alleged exposure to asbestos the plaintiffs claim(s) is based.
2. “Address” means the present or last known street name and number, city or town, state and zip code.
3. “Document” or “documents” means the original and any identical or non-identical copy, regardless of origin or location, of any writing, record or data compilation of any type or description.
4. “Oral communication” or “oral communications” means any verbal conversation or other statement from one person to another.
5. “Person” or “persons” means a natural person, firm, proprietorship, association, partnership, corporation or any other type of organization or entity.
6. All words of masculine gender shall include the feminine gender thereof; for example, “his” shall include “her.”
7. “Tobacco products” means cigarettes, cigars, pipe, chewing tobacco, snuff, or any other tobacco product.

## INSTRUCTIONS

1. Answer each interrogatory separately. When an interrogatory contains separately numbered or lettered paragraphs, treat each paragraph separately, and give a separate answer for each such paragraph.
2. In answering these interrogatories, furnish all information, however obtained, including hearsay which is available to you and information known by or in possession of yourself, your agents and your attorneys, or appearing in your records.
3. A question which seeks information contained in or information about or identification of any documents may be answered by providing a copy of such documents at the ponders expense without a separate request for information.
5. If you object to any interrogatory, or part thereof, state all your reasons for objecting. If you claim privilege or work product immunity as a ground for not answering any interrogatory in whole or in part, furnish such information or documents as are not encompassed within your objection and, as to the information, document, or portions thereof you contend are privileged or immune from discovery, describe the factual basis for your claim of privilege or immunity in sufficient detail so as to permit the court to adjudicate the validity of the claim.

6. These Interrogatories and requests for Production of Documents are continuing and require supplementation pursuant to Rule 26 (e) of the Federal Rules of Civil Procedure.

### INTERROGATORIES

1. Please state your full name, including aliases or nicknames; date of birth, social security number and current address.
2. If the person answering these interrogatories is the representative of a deceased claimant, set for the name of the person responding to these interrogatories; the legal capacity in which the person is responding; the date and place of the decedent's death; the decedent's cause of death; and, whether or not you contend that the decedent's death was related too asbestos exposure.
3. Have you or your attorneys filed on behalf of any plaintiffs named herein, any related or companion lawsuits or legal actions in any court based upon any alleged asbestos-related condition? If so, please list the caption and identifying number of any such suits.
4. Please provide a chronological list of all addresses at which you have resided. Please also provide the dates of residence at these addresses.
5. State the names and dates of birth of your spouse and children, as applicable.
6. If any person, including those listed in No. 5 above, is partially or totally dependent upon you, state his or her name, date of birth, current address, relationship to you, and the amount of support given during the last five (5) years.
7. Set forth your current occupation and employer.
8. Please provide a complete chronological history of work experience, to include: the name and address of each employer and worksite, your job title, the dates of employment, and whether you were exposed to asbestos at the job or worksite listed, and the period of time for each alleged exposure.
9. If this lawsuit is based upon any asbestos exposure other than that described in the preceding interrogatory, then set forth the nature, location and dates of said exposure.
10. If you are retired, please state the date of retirement, type of retirement, the employment retired from and the reason for your retirement.
11. During your last full-time employment, what was your gross income?
12. What are your injuries for which you are claiming compensation in this lawsuit?
13. What is the name and address of the doctor who diagnosed these injuries, and what was

the date of diagnosis?

14. Please provide a complete list of hospitals, institutions or other health-related facilities in which you have been confined, or in which you have received out-patient treatment, including: the name and address of the hospital, institution, or other health-related facility; the date of admission; the date of discharge; medical condition, illness or symptoms which were the basis for each hospitalization, institutionalization or other treatment; diagnosis of discharge; and, the full name of and address of the admitting physician or principal treating physician.
15. Please provide a copy of a complete list of medical practitioners, including but not limited to physicians and therapists, excluding those listed in No. 14 above, who have rendered services to you, and as to each, state: full name and present or last known address; the date(s) of examination, treatment, or other care; and the medical condition, illness or symptoms which were the basis for each examination, treatment or consultation.
16. If you have ever used tobacco products, state: the type(s) of tobacco product you have used; the dates during which you have used each type of tobacco product (i.e., two packages of cigarettes daily, three cigars daily, two pipefuls daily, etc.).
17. State whether you have sought, filed for, or received any of the following: Workmen's Compensation benefits; sickness, accident or disability benefits provided by or through and employer for non-employment related conditions; Social Security disability benefits; Veteran's medical or disability benefits; Union disability benefits; and, any other disability benefits.
18. For each affirmative response to Interrogatory No. 17, please provide the following: a description of the benefits sought, filed for, or received; the identity of each person, firm, corporation or entity (including insurance companies or union) from which benefits were sought, filed for or received; claim number, account number or other identifying information; the date of request or claim for benefits; and the date on which benefits were first received or denied.
19. Describe your education background, including
  - (a) the names and addresses of all schools attended;
  - (b) dates of attendance;
  - (c) dates of graduation;
  - (d) diplomas or degrees received.
20. Have you ever served in the Armed Forces of the United States? If so, state:
  - (a) the branch of service;
  - (b) your serial number, initial rank, rank at discharge, and the highest rank held;
  - (c) the dates of your service;

- (d) the type of discharge you received
  - (e) whether you were given any physical examination which included x-rays;
  - (f) whether you were injured while in the service and the nature of your injury or injuries;
  - (g) whether you incurred any illness requiring hospitalization while in the service and the nature of that illness;
  - (h) whether you claimed any disability for any injury, physical condition, or illness arising out of your military service; and if so, state the details of the claim, the date the claim was made, when the claim was adjudicated, and the compensation, if any, which was awarded.
21. What is your present marital status?
22. Have you ever been married to anyone other than your present spouse? If so, state:
- (a) your former spouse's name and present address;
  - (b) the date of the marriage;
  - (c) how and when the marriage ended;
  - (d) whether you provide any support for the former spouse;
  - (e) whether the former spouse provides any support for you.
23. Have you or your spouse ever lived apart from one another, either under a legal separation agreement or under an informal arrangement? If so,
- (a) when?
  - (b) for how long?
  - (c) what was your address and your spouse's during the separation?
24. Has your spouse ever been employed? If so, state:
- (a) the name and address of each employer;
  - (b) the dates of employment;
  - (c) whether employment was or is full-time or part-time;
  - (d) the job title(s) and description(s);
  - (e) the amount of the spouse's average weekly or monthly salary.
25. Have you ever engaged in any part-time employment within the past five years in addition to your regular occupation? If so, state:
- (a) each employer for whom you worked part-time;
  - (b) the type of work performed;
  - (c) the rate of pay;
  - (d) the number of hours or days you were employed; and
  - (e) whether you are currently employed.

26. Describe any pain or suffering for which you are claiming compensation in this lawsuit.
27. Describe the nature of any disability for which you are claiming compensation in this lawsuit.
28. If you have had chest x-rays taken, including x-rays taken at the request of your employer, state:
  - (a) the names and address of the persons who took the x-rays;
  - (b) the dates on which the x-rays were taken;
  - (c) the charges you incurred for the x-rays and evaluations;
  - (d) if and when you were informed of the results of those x-rays.
29. Has any physician or other person conducted pulmonary function tests done at the request of your employer? If so, who conducted the tests and when and where were they conducted? Please list any costs you incurred for the tests.
30. Are you still under a physician's care for the injuries which are the subject of this lawsuit? If so, state:
  - (a) name(s) and address(es) of the treating physicians;
  - (b) the frequency of treatment; and
  - (c) the date you were last treated.
31. Have you ever been confined to a bed or confined to your house because of the condition for which you instituted this lawsuit? If so, state the period of that confinement.
32. Did you have an annual or other regular physical examinations? If so, state the names and addresses of the examining physicians, when and where they took place, whether you or your employer requested these examinations, and whether you were advised of the results.
33. If you have not fully recovered from the injuries for which you are suing, state in what ways you have not fully recovered.
34. Do you claim that exposure to asbestos has aggravated a pre-existing condition?
  - (a) If so, had you recovered from the pre-existing condition at the time of the exposure to the asbestos materials?
  - (b) If you have recovered, what was the date of recovery?
35. When were you first aware of any symptoms which you are now believe to be related to the injuries for which you are suing? What were those symptoms?

36. If you believe you were exposed to asbestos materials aboard specific ships or in certain buildings, identify the ships or buildings.
37. Set forth in detail the exact nature of your work that involved exposure to asbestos materials, including:
  - (a) the frequency of contact with asbestos materials;
  - (b) the frequency with which you worked near other persons who worked with asbestos materials; and
  - (c) the manner in which you performed your work.
38. List, by type, brand or trade name and manufacturer, every asbestos-containing product to which you believe you were exposed.
39. For each asbestos-containing product identified in the answer to the preceding interrogatory, set forth the places, circumstances, and dates of exposure.
40. For each separate defendant to whose asbestos products you claim exposure, state the names, home addresses and business addresses for all individuals who have knowledge of that particular exposure.
41. State whether each asbestos-containing product you have identified had any caution or warning, and if so, set forth the nature and text of each such warning or caution and when you first became aware of such warning or caution.
42. Did you ever work with, or around, asbestos-containing materials, which were manufactured, sold, prepared, or distributed, installed or removed by any person or company not named as a defendant in this lawsuit?
43. If your answer to the previous interrogatory is in the affirmative, identify each such person or company, and state:
  - (a) the type of product;
  - (b) when and where the exposure occurred;
  - (c) the type of work you were doing during this exposure;
  - (d) how the exposure occurred; and
  - (e) your employer at the time.
44. What are the names and address of each of your supervisors during the period in which you claim you were exposed to asbestos materials?
45. What are the names and addresses of each of your co-workers when you were allegedly exposed to asbestos?
46. Have you or your attorneys, representatives, or experts performed any tests upon any

asbestos-containing products, to which you claim you were exposed, to determine their composition?

47. If so, state the name, address, job classification, and employer of the person who conducted each test, and:
  - (a) the date of each test;
  - (b) state the tools used in each test;
  - (c) state where each test was conducted;
  - (d) set forth a summary of the findings or results of each test;
  - (e) state the nature of the test performed on each product;
  - (f) state the names, addresses and occupations of all persons present during any of the tests;
  - (g) state the specific products on which the tests were conducted; identifying the products by manufacturer, brand or trade name, and type of product;
  - (h) state whether any reports, notes, memoranda, or other type of record was made for any such test, and if so by whom.
  
48. State the present location of the record referred to in the preceding interrogatory, including the name, address, and occupation of the person who has possession of such record.
  
49. Do you, your attorneys, your representatives or experts have possession of any samples of any asbestos or asbestos-containing products referred to in the Complaint; and if so, state:
  - (a) the name, address, and job classification of the person having custody;
  - (b) the manufacturer's name, brand or trade name, distributor's name, and type of product for each sample;
  - (c) when, where, and from who each sample was obtained;
  - (d) whether the samples were altered or changed in any way from the state in which they were manufactured and originally distributed;
  - (e) whether you have viewed any such sample; and if so, when.
  
50. State whether you or any other person known to you has, or knows of photographs of insulating repair or insulating work done by, or near you; and if so, state:
  - (a) when each photograph was taken;
  - (b) the name, address, and occupation of the person who took each photograph;
  - (c) where each photograph was taken;
  - (d) the present location and the name, address, and occupation of the custodian of each such photograph;
  - (e) what each photograph depicts;
  - (f) whether you personally have seen any such photographs; and if so, when.
  
51. Do you, or any person known to you, have, or know of, the existence of any asbestos

product information or data sheets with information about the characteristics and uses of any asbestos product to which you were exposed. If so, state:

- (a) the manufacturer or seller, brand or trade name, and type of product of each sample;
  - (b) when and from whom each sample was obtained;
  - (c) whether you have seen any of these product information or data sheets and, if so, when.
52. Do you, or any person known to you, have or know of, photographs of any asbestos-containing products made or sold by any defendant or other person or company; and if so, state:
- (a) when each photograph was taken;
  - (b) the name, address, and occupation of the person who took the photograph;
  - (c) where each photograph was taken;
  - (d) the present location and the name, address, and occupation of the custodian of each such photograph;
  - (e) what each photograph depicts;
  - (f) whether you personally have seen any such photographs; and if so, when.
53. Did your employer ever give you instructions or warnings during the course of your employment about any alleged dangers of asbestos?
54. If the answer to the preceding interrogatory is yes, then for each instruction or warning, state:
- (a) the date given;
  - (b) the person who gave it;
  - (c) whether the communication was written or oral;
  - (d) if the communication was written, whether you have a copy of it in writing or know if anyone who does have a copy;
  - (e) if the communication was written, the author of the communication; and
  - (f) a summary of the communication.
55. Were masks, respirators, or other dust inhalation inhibitors available during any part of your employment, if so, state:
- (a) whether the devices were provided by your employer;
  - (b) the period of time of your employment during which the devices were available to you;
  - (c) what instructions were given to you about using the devices;
  - (d) the manufacturer of the device;
  - (e) whether and when you ever used the devices;
  - (f) how often, by a percentage of the time you were exposed to asbestos materials,



you in fact used the devices.

56. Did any of your employers ever recommend or require that you use any device to reduce your possible exposure to, or inhalation of, asbestos fibers?
57. If your response to the preceding interrogatory was in the affirmative, state:
- (a) the employer's name and address;
  - (b) when, where, and the circumstances under which each recommendation or requirement was made;
  - (c) the identity of the person who issued the recommendation or requirement to you;
  - (d) the identity of each person present when each recommendation or requirement was made to you;
  - (e) the identity of each person who received the same or similar recommendations or requirement;
  - (f) the exact wording and content of each recommendation or requirement; and whether it was made in writing or orally;
  - (g) the type, make, and model of each device referred to in each recommendation, or requirement;
  - (h) the nature of the action, if any, you took in response to each recommendation or requirement.
58. Did you at any time receive any publication, warning, requirement, or recommendation, whether written or oral, which purported to:
- (a) advise you of possible harmful effects of exposure to, or inhalation of asbestos; or
  - (b) recommend techniques or equipment which would reduce or guard against such potentially harmful exposure?
59. If you answered in the affirmative to any part of the preceding interrogatory, state for each communication:
- (a) the nature and exact wording;
  - (b) when, where and the circumstances under which it was communicated;
  - (c) the identity of each witness to your receipt of the communication;
  - (d) the identity of each co-worker or similarly situated person who received a similar communication.
60. Do you, or any person known to you, have or know of, samples of any asbestos product labels, warnings, packaging markings, or writings, or any other type of symbols or writings identifying or describing such products or warnings of hazards of such products; if so, state:
- (a) the manufacturer, brand or trade name, type of product of each sample;

- (b) when and from who sample was obtained;
  - (c) whether the samples were altered or changed in any way from when they were originally produced;
  - (d) whether you have seen such samples; and if so, when.
61. Do you, or any person known to you, have, or know of, samples of warning signs, notices, bulletins, pamphlets, memoranda, or other writing posted at your place of employment by your employer, your labor union, by any state governmental agency, about asbestos health hazards or work practices and procedures to be followed when working with or near asbestos-containing products; and if so, state:
- (a) the type and content of the sample;
  - (b) when and from whom the sample was obtained;
  - (c) when the writing was issued or posted; and
  - (d) the present location, and the name, address and occupation of the person who has possession, of each such sample.
62. Were you a member of any labor union at anytime? If so, state for each membership:
- (a) the name of the union and its Local;
  - (b) the time periods in which you were a member;
  - (c) the names of your local's officials.
63. When were you an apprentice?
64. When were you a journeyman?
65. What offices had you held, and on what committees have you served for either your local regional, national or international union?
66. Have you ever attended any international, national, regional or local union meetings, seminars, conferences, or conventions, at which the subjects of occupational health and exposure to asbestos were discussed? If so, state:
- (a) when and where such meetings took place;
  - (b) the names and addresses of any speaker or discussion leader; and
  - (c) a summary of the matters under discussion.
67. Have you ever been informed by any person in your local or international union of any possible hazards associated with exposure to asbestos? If so, state:
- (a) the name, address, and official capacity of the person;
  - (b) when and where you were so informed;
  - (c) the information you received;
  - (d) what action, if any, you took upon learning this information.

68. Did you receive any union newspapers, newsletters, or other production? If so, state:
- (a) the type and nature of each publication received;
  - (b) how often you received such publications; and
  - (c) whether you read such publications.
69. Have you ever discussed this lawsuit or the injuries you claim in this lawsuit with any official of your local or international union? If so, state:
- (a) the name, address, and official capacity of each person with whom you discussed these matters;
  - (b) when, where, and under what circumstances did you discuss these matters;
  - (c) the substance of these discussions.
70. Did you ever participate in any medical screening program or health survey sponsored by, or with, your local or international union? If so, state:
- (a) when and where you so participated;
  - (b) the nature of the program or survey;
  - (c) the name and address of any examining physician or health practitioner;
  - (d) whether any x-rays were taken.
71. If you are claiming loss of earnings or impairment or earning power because of any asbestos-related condition, disease or injury, then state:
- (a) when you first became impaired;
  - (b) the name and address of your employer, your job classification, and your monthly or weekly rate of pay at the time you claim to have become impaired or lost earning power;
  - (c) if you had more than one employer during the three-year period prior to the onset of the impairment in earning power, then state the names and addresses of all employers, your job classifications, your weekly or monthly rates of pay, and the dates of employment;
  - (d) the dates during which you were unable to work to your expectations because of any asbestos-related injury, and the total amount of pay you lost because of this inability.
72. State whether you have ever sought, filed for or received any of the following:
- (a) Social Security retirement benefits;
  - (b) life insurance benefits including but not limited to waiver of premium;
  - (c) union retirement benefits;
  - (d) any other retirement benefits; and

- (e) unemployment compensation.
73. When, if ever, did you first become aware that asbestosis was a compensable occupational disease under a state or federal workmen's compensation Act? State how you became aware of this fact.
74. For each hospital, or other health-related facility in which you have been confined as the result of any alleged asbestos related condition, disease or injury itemize by facility the costs you incurred. State whether or not these expenses have been paid, partially or wholly, and identify the person or other entity who has paid them.
75. State the total amount of any other expenses, including doctor bills, which you incurred as a result of your alleged asbestos-related condition, disease or injuries. State whether or not these expenses have been paid, partially or wholly, and identify the person or entity who has paid them.
76. If a claim is made for household help, state the names and addresses of each person employed for household help, the dates of the employment, and the expenses incurred.
77. Do you now consume, or have you ever consumed, alcoholic beverages? If so, describe what you drink, and the frequency and quantity of your consumption.
78. If you have used cigarettes, cigars, pipes, or any other tobacco product, state:
- (a) the brand names of the tobacco product;
  - (b) whether you were ever advised by any physician or other person to stop using tobacco products, and if so, identify each person so advising you, and state when the advice was given to you, and whether you followed the advice.
79. If you ever stopped using tobacco products, please state your reasons for doing so.
80. Are you aware of the United States Surgeon General's cautions placed on all cigarette packages and advertisements? If so, when did you acquire this awareness?
81. Have you ever read the warnings referred to in the preceding interrogatory.
82. Have you ever smoked cigarettes after becoming aware of the cautions?
83. Are you aware that the use of tobacco may cause cancer? If so, when did you acquire this knowledge?
84. Identify the sources of all information you, your attorneys, or other representatives, obtained in answering the preceding interrogatory, setting forth the names and addresses of all persons providing the information, their employment, and their job positions.

85. Have you ever given sworn testimony in a criminal or civil proceeding other than this; and if so, state:
- (a) when and where you testified;
  - (b) who called you as a witness;
  - (c) in what court you testified;
  - (d) the subject matter of your testimony;
  - (e) the parties to the proceedings.
86. Identify all written statements which you have made which relate to the facts of this lawsuit and the damages claimed.
87. List the names of each person who will testify as a fact witness on behalf of the plaintiffs.
88. For each person identified in your answer to interrogatory number 87, state the person's
- (a) age;
  - (b) home and business address;
  - (c) employer's name;
  - (d) occupation;
  - (e) previous employment history, including a description of duties for each employer.
89. For each person identified in your answer to interrogatory number 87, state the subject matter of the witness's proposed testimony and the facts to which the person will testify.
90. With whom did you consult in preparing your answers to these interrogatories?
91. Did you rely on any documents in preparing your answers to these interrogatories? If so, describe each document fully, and state when, where, and from whom you obtained the document.
92. Have you retained any medical expert witness who may testify on your behalf in this litigation? If so, please state:
- (a) his name and address;
  - (b) for every college, university or institute of higher education attended list address, dates of attendance, degrees conferred, and any awards won for academics, research, etc.
93. Has your expert attended any continuing medical education seminars or lectures pertinent to the area of expected testimony? If so, please state:
- (a) Location;
  - (b) Dates of attendance;
  - (c) Subject matter;

- (d) Instructors.
94. For the experts identified in answer to interrogatory 92, above, please state all other post-graduate training, including internships, residences, fellowships, research assistant ships, etc., and include their dates, names and addresses of institutions.
95. For the experts identified in answer to interrogatory 92, above, please state the name and address of every employer, dates of each, title and description of general duties. If self-employed for any period, indicate the dates and general description of activity.
96. Is the expert or has he been a member of any member of any medical or professional associations or societies? If so, please state:
- (a) the name and address of said professional society;
  - (b) whether membership was or is elective, voluntary, honorary or compulsory;
  - (c) the title and dates of any office held.
97. Has the expert received any certifications, professional fellowships, honors or awards? If so, please state:
- (a) the certifying, accrediting or presenting organization;
  - (b) the title, honor or award received;
  - (c) the date received;
  - (d) the underlying reason for the presentation.
98. Is the expert or has he ever been, a radiologist? If so, please state:
- (a) when expert entered specialty;
  - (b) is expert board certified;
  - (c) has expert ever been refused board certification.
99. Is the expert, or has he ever been a specialist in internal medicine? If so, please state:
- (a) when the expert entered specialty;
  - (b) is the expert board certified;
  - (c) has expert ever been refused board certification;
  - (d) is expert board certified in subspecialty of pulmonary disease;
  - (e) has expert ever been refused board certification in subspecialty of pulmonary disease.
100. Has the expert been accredited under the ILO International Classification System of Radiographs of the Pneumoconiosis? If so, please state:
- (a) whether expert is an "A" or "B" reader;
  - (b) date expert was accredited;

- (c) whether expert has ever taken and failed the “B” Reader Test. If so, the number of occasions on which the “B” Reader Test was taken and the dates of the test.
101. Has the expert written or contributed to any professional text? If so, please state:
- (a) the title of the text and date of publication;
  - (b) the publisher of the text;
  - (c) the portion contributed by the expert.
102. Has the expert written or contributed to any professional articles? If so, please state:
- (a) the name of the periodical in which the article appeared;
  - (b) the title of the article;
  - (c) the date of the periodical;
  - (d) the page on which the periodical appears.
103. Has the expert written or contributed to any professional articles which were submitted and rejected for publication? If so, please state:
- (a) the name of the periodical which rejected the article;
  - (b) the title of the rejected article;
  - (c) the date of the rejection;
  - (d) whether any of these rejected articles were successfully resubmitted.
104. Is the expert, or has he ever been, a member of the editorial or article review board of any professional journal or publication? If so, please state:
- (a) the name of the journal or publication
  - (b) dates of service.
105. Has the expert written any unpublished papers pertinent to the area of expected testimony which were delivered to any professional organizations? If so, please state:
- (a) the title of the paper;
  - (b) the subject matter thereof;
  - (c) the organization to whom delivered;
  - (d) whether the expert still has a copy of the paper.
106. Is the expert, or has he ever been a member of any panel, commission or board of inquiry related to the area of expected testimony?
- (a) the name and address of any such panel;
  - (b) the nature and scope of participation;
  - (c) whether any official reports or studies were produced;
  - (d) the name and address of the custodian of such reports.

107. Has the expert testified or made any presentation at any public executive, legislative, regulatory or advisory body regarding the area of expected testimony? If so, please state:
  - (a) the name and address of such bodies;
  - (b) the name and address of the entity on whose behalf the expert appeared;
  - (c) the total amount of fees or expenses paid.
108. Has the expert prepared a report in anticipation of litigation or preparation for trial? If so, state its date, and describe its contents. (In lieu of answer, attach copy of report).
109. Set forth the facts to which the expert is expected to testify. (In lieu of answer, attach copy of report).
110. Set forth the opinions to which the expert is expected to testify. (In lieu of answer, attach copy of report).
111. State in detail the factual information supplied to the expert which was used as a basis for forming his opinion, including all documents, reports or records furnished, statements, testimony, physical evidence, objects, test results or other tangible things provided to the expert for review or inspection. (In lieu of answer, attach copy of report).
112. In testifying, will the expert rely upon any text, publications, periodicals, learned treatise or any other reference material? If so, please state:
  - (a) the title of the text, publication or reference material;
  - (b) the author of this material;
  - (c) the edition and page reference.
113. Set forth the amount of payment any itemization of costs, expenses and/or fees the expert is to receive.
114. Please list the names and address of every person you intend to call at the time of trial to testify as a non-medical expert witness and for each state and identify:
  - (a) the subject matter of his expected testimony;
  - (b) the substance of the facts and opinions to which he will testify;
  - (c) all materials or other information provided by you to him for the preparation of his testimony in this case;
  - (d) all material reviews by him with regard to his testimony in this case;
  - (e) all materials upon which he will rely for his testimony in this case;
  - (f) all materials he will utilize during the course of his testimony in this case;
  - (g) his employers for the past ten years and his title and job responsibilities for each;
  - (h) the caption of every other asbestos case in which he has testified since 1980, the party for who he testified and the name of the opposing counsel on each;
  - (i) all facts upon which you will rely at trial to qualify him as an expert;



- (j) all books, articles, studies or other matters published by the expert;
- (k) the title and subject matter of all unpublished articles, books or studies authored by the expert.

115. State the name and address of every person who has been retained, consulted or specially employed as an expert in anticipation of litigation or preparation for trial, but who is not expected to be called as a witness at trial.

#### REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1. A copy of the diagnosing physician's report and any other expert's report.
2. A copy of any and all Releases executed in the cases identified in your answer to interrogatory 3, above.
3. Produce and permit defendants, and their experts, to inspect, test, or sample each of the following objects:
  - (a) all chest radiographs, tomographic films, computerized tomographic (C.T.) Films, gallium or other radioisotropic tracing films, perfusion and ventilation scans, nuclear magnetic resonance (N.M.I.) films, or any other record of any diagnostic imaging modality; and
  - (b) all tissue slides, tissue blocks, whole tissue or organ specimens, sputum cytology slides and specimens, biopsy or autopsy slides, and any other pathologic material from plaintiff.
4. Produce and permit defendants, or their agents, to inspect and to copy each of the following documents:
  - (a) all radiologists' reports of any diagnostic radiologic procedure performed upon plaintiff;
  - (b) all pulmonary function data on plaintiff, including, but not limited to, all measurements of diffusion capacity, arterial blood gases, lung compliance, lung volumes, expiratory and inspiratory lung airflow rates;
  - (c) all interpretive reports on pulmonary function data on plaintiff;
  - (d) all representative reports on cytologic, histologic, or pathologic materials from plaintiff;
  - (e) all reports of all plaintiff's proposed trial experts;
  - (f) all employment records of plaintiffs;
  - (g) all social security records of plaintiff;
  - (h) all medical records and reports of all treating physicians of the plaintiff;
  - (i) all W-2 tax statements plaintiff's and any spousal earnings for the last five tax years;
  - (j) all federal income tax returns filed by the plaintiffs in the last five years;
  - (k) all safety bulletins, guides, booklets, pamphlets, or other publications on asbestos

- exposure issued by any of the plaintiff's employers to the plaintiff;
- (l) all applications for life insurance on the life of the plaintiff;
  - (m) all publications received from any labor organizations or unions, to which plaintiff belonged, which publications asbestos and workplace safety;
  - (n) any written grievances filed by the plaintiff against any of his employers, with any of his employers, with employer's representative;
  - (o) any written grievance filed by the plaintiff against any of his employers, with any labor organization or union;
  - (p) any correspondence between the plaintiff and any labor organization or union, about working conditions, about asbestos, or about the plaintiff's alleged asbestos-related condition;
  - (q) any billing statements, receipts, or canceled checks for bills, pertaining to medical treatment for plaintiff's conditions, which the plaintiff contends are related to asbestos exposure;
  - (r) any workmen's compensation or occupational disease petitions, employer's responses, answers to employer-respondent/s interrogatories, physician's reports and statements, and transcripts of testimony of plaintiff and his expert witnesses in proceedings for workmen's or occupational disease compensation;
  - (s) any and all records indicating what asbestos materials or products the plaintiff was exposed to.
  - (t) any statement concerning this action or its subject matter previously made by the plaintiff or a witness. For purposes of this request, a "statement" is a written statement signed or otherwise adopted or approved by the person making it, or a stenographic, mechanical, electrical or other recording, of a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

5. If applicable, please provide the following:

- (a) a copy of the plaintiff's decedent's autopsy report;
- (b) a copy of the Letters Testamentary of letters of Administration appointing plaintiff as plaintiff's decedent's legal representative;
- (c) any and all state Inheritance Tax Returns, with attachments filed on behalf of plaintiff's decedent;
- (d) a copy of plaintiff's decedent's death certificate.

END