

EXHIBIT A

Plaintiff: **MICHAEL HALSETH**

Plaintiff's injuries: Plaintiff was diagnosed with asbestos-related pleural disease on or about 02/09/2007, and Asbestosis on or about 10/13/2006. Defendants: Plaintiff contends that the asbestos-containing products to which he was or may have been exposed to were manufactured, supplied, distributed, installed and/or contracted for by Defendants. Plaintiff's exposure to asbestos occurred at the following times and places, and involved exposure to dust created by the contractors and the products of the entities listed below. The exposure includes, but is not limited, to the following presently known contractors and the manufacturers and distributors of asbestos-containing products:

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
United States Navy	<u>USS HECTOR</u> (AR-7) Naval Repair Facility, San Diego, CA (32 nd St. Annex); Pearl Harbor Naval Shipyard, Honolulu, HI; Long Beach Naval Shipyard, Long Beach, CA; Naval Air Station, Alameda, CA	Machinist Mate	1963-1965
	<u>USS MISPELLION</u> (AO-105); Boston Naval Shipyard, Boston, MA		1965-1966

Job Duties: On the USS HECTOR, plaintiff removed asbestos insulation from WESTINGHOUSE turbines, which would release a lot of dust. Plaintiff worked in the engine room. Plaintiff recalls that the USS HECTOR was an auxiliary repair ship, which performed on-site repairs to other ships. The ship was repaired in several California ports including: San Diego, Alameda, Hawaii, and home port of Long Beach. Plaintiff performed all kinds of repairs, including but not limited to rebuild of steam valves by installing asbestos packing and gaskets. Plaintiff recalls the steam valves had GARLOCK packing. Plaintiff worked with asbestos insulation for valves and boilers. Plaintiff worked with CRANE CO. valves. Plaintiff worked as a firefighter on the USS HECTOR. Plaintiff put out fires on pumps while in the USS HECTOR engine room. Plaintiff recalls workers from Long Beach Naval Shipyard, California. Plaintiff was around shipyard workers when they were repairing BABCOCK & WILCOX boilers. Plaintiff worked with GARLOCK, FLEXITALLIC and VICTOR gaskets (DANA CORPORATION). On the USS MISPELLION, plaintiff repaired pumps and also worked as a firefighter. Plaintiff replaced the seals and bearings. Plaintiff recalls the following products:

INGERSOLL-RAND, GENERAL ELECTRIC COMPANY, WESTINGHOUSE, GOULD PUMP and PEERLESS boilers. On both ships, plaintiff recalls the following suppliers of asbestos-containing products: RAYBESTOS-MANHATTAN cloth and UNIBESTOS insulation. Plaintiff used asbestos cloth on the ships. Plaintiff used JOHNS-MANVILLE pipecovering and asbestos rope on the ships. Plaintiff applied and removed valve packing. Plaintiff sealed the valves and then wrapped them. Plaintiff applied and removed pipe lagging. Plaintiff currently does not recall the names of any supervisors or co-workers.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
TNH Construction Gresham, OR	Portland Metropolitan Area Various residential buildings Portland, OR	Contractor	1968-1970

Job Duties: Plaintiff worked as a Contractor for Century 21 Homes. Plaintiff had a junior partner called Francis Tom Shaw. Plaintiff performed remodeling, trimming and siding work. Plaintiff performed insulation work in attics, installed siding and decking and performed sub floor installation. Plaintiff removed lath and plaster and then installed sheetrock. Plaintiff applied and sanded dry and premixed joint compounds. Plaintiff would sometimes tear off old floor tiles and install new ones. Plaintiff worked around insulators, plumbers and drywallers. Plaintiff recalls that KNEZ BUILDING MATERIALS CO., located in Tigard, Oregon, supplied insulation and joint compound for this job. Plaintiff recalls the following manufacturers of asbestos-containing products: ARMSTRONG, CONGOLEUM and FLINTKOTE flooring, CELOTEX insulation and GOLD BOND joint compound. Plaintiff worked with linoleum. Plaintiff recalls the following supervisor: Chuck Hanberger, current whereabouts unknown. Plaintiff recalls the following co-worker: Jerry Halseth, Beaverton, Oregon.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Art Lutz Co. Portland, OR	Portland Metropolitan Area Various residential buildings Portland, OR	Contractor	1970-1980

Job Duties: Plaintiff performed similar job duties as described above when working for TNH Construction. Plaintiff applied and sanded dry and premixed joint compounds. Plaintiff recalls the following manufacturers of asbestos-containing products: CELOTEX insulation, CONGOLEUM and ARMSTRONG flooring, GOLD BOND joint compound and JOHNS-MANVILLE insulation. Plaintiff recalls that KNEZ BUILDING MATERIALS CO., located in Tigard, Oregon, supplied insulation and joint compound for this job. Plaintiff currently does not

recall the names of any co-workers.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Robert Bainton Portland, OR	Portland Metropolitan Area, including:	Contractor	1980-1990
	Pier 101 Restaurant Portland, OR		1980-1983

Job Duties: Plaintiff performed remodeling work. Plaintiff installed and paneled walls. Plaintiff removed walk-in coolers. Plaintiff tore out existing flooring and put down new flooring. Plaintiff worked close to workers who scrapped off mastic. Plaintiff worked as a drywall. Plaintiff installed, taped, sanded and cleaned up GOLD BOND taping compounds. Plaintiff ripped out old drywall. Plaintiff recalls a very dust environment. Plaintiff used premixed joint compound. Plaintiff recalls that no respiratory protection was provided. Plaintiff applied sound board material to exterior walls to create a sound barrier. Plaintiff recalls working around insulators and roofers. Plaintiff recalls the following manufacturers of asbestos-containing products: CELOTEX insulation, CONGOLEUM and ARMSTRONG flooring, GOLD BOND joint compound and JOHNS-MANVILLE insulation. Plaintiff recalls the following co-worker: Jerry Halseth, Beaverton, Oregon.

Plaintiff: **ROBERT WAGENMAN**

Plaintiff's injuries: Plaintiff was diagnosed with asbestos-related pleural disease on or about 08/22/2005, and Asbestosis on or about 08/22/2005. Defendants: Plaintiff contends that the asbestos-containing products to which he was or may have been exposed to were manufactured, supplied, distributed, installed and/or contracted for by Defendants. Plaintiff's exposure to asbestos occurred at the following times and places, and involved exposure to dust created by the contractors and the products of the entities listed below. The exposure includes, but is not limited, to the following presently known contractors and the manufacturers and distributors of asbestos-containing products:

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
United States Navy	Naval Training Center San Diego, CA	Trainee	6/1964
	<u>U.S.S. HECTOR</u> (AR 7) Pier 9	Electrician	9/64-6/65

Long Beach, CA

Electrician's Mate School San Diego, CA	Electrician	6/65-10/65
Motion Picture School San Diego, CA	Film Technician	10/1965 (2 weeks)
<u>CLARKE COUNTY</u> (LST-601)	Electrician	12/65- 6/1968

Job Duties: Plaintiff enlisted in the United States Navy in 1964. Plaintiff recalls that after his basic training at the Naval Training Center in San Diego, California, he was sent to Motion Picture School, San Diego, California, where he performed duties that included setting-up and repairing 16 mm films, projectors and showing films.

Plaintiff served aboard the CLARKE COUNTY (LST-601). Plaintiff duties included standing watch in the auxiliary machinery room where the generators were located. Plaintiff recalls the pipes were wrapped with asbestos cloth and mud. Plaintiff recalls repairing electrical systems throughout the ship. Plaintiff recalls exhaust pipes from diesel engines wrapped with asbestos, steam pipes wrapped with asbestos, asbestos arch shields, asbestos wrapped wiring in controllers and switchboards throughout the ship. Plaintiff recalls coworkers Larry Biddle and Bill Stute, addresses unknown. Plaintiff recalls his supervisors Ken Gaugh, Electrician EM1, address unknown and Lt. H. A. Goldsberry, address unknown.

Plaintiff was assigned to the U.S.S. HECTOR (AR-7), Long, Beach, California. Plaintiff recalls a fire aboard the U.S.S. HECTOR (AR-7) that he helped contain. Plaintiff recalls his duties aboard the U.S.S. HECTOR (AR-7) were the same as or similar to those described for the CLARKE COUNTY (LST-601) above. Plaintiff cleaned electrical systems on the CLARKE COUNTY (LST-601) and U.S.S. HECTOR (AR-7) with a brush. Plaintiff recalls supervisor Tony Yakapin, EM2, address, unknown.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Date</u>
U. S. Department of Defense	Philadelphia Naval Shipyard Philadelphia, PA	Electrician	8/1968- 9/1970
	<u>NEWPORT</u> (LST-1179)		
	<u>MANITOWOC</u> (LST-1180)		

SUMTER (LST-1181)

Job Duties: Plaintiff performed layout and installation of electrical components during new ship construction of the NEWPORT (LST-1179), MANITOWOC (LST-1180) and SUMTER (LST-1181) Plaintiff installed wiring to refrigeration compartments, switchboards, and engine compartments and ran electrical cables throughout the ship. Plaintiff connected boxes for the bow door-ramp. Plaintiff recalls placing asbestos blankets over the wall- mounted controller boxes while holding them in place for the welder. Plaintiff used asbestos blankets to protect himself and the controller boxes. Plaintiff recalls stripping wire to make connections when installing the refrigeration compartments. Plaintiff used a lead-coated wire with a cloth fabric interior that came in spools of 1,000 feet. Plaintiff would lay out and cut the wire to the specifications of each installation.

Plaintiff recalls SQUARE D and WESTINGHOUSE at the job site. Plaintiff used TEMP SEAL. Plaintiff recalls GENERAL ELECTRIC control panels, UNION CARBIDE CORP. BAKELITE, WESTINGHOUSE and GENERAL ELECTRIC wire and cable. Plaintiff recalls coworkers Gary Moss, address unknown, Mel Weems, address unknown and Robert Groff, address unknown.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U. S. Department of Defense	Mare Island Naval Shipyard Vallejo, CA	Electrician	1970-1976
	<u>BENJAMIN FRANKLIN</u> (SSBN-640)		1970-95
	<u>DOLPHIN</u> (AGSS-555)		1970-95
	<u>FLASHER</u> (SSN-613)		1970-95
	<u>GEORGE WASHINGTON</u> (SSN-598)		1970-95
	<u>GUARDFISH</u> (SSN-612)		1970-95
	<u>GUIARRO</u> (SSN-665)		1970-95
	<u>HADDOCK</u> (SSN-621)		1970-95
	<u>HALIBUT</u> (SSGN-587; SSN-587)		1970-95
	<u>JOHN MARSHALL</u>		1970-95

(SSBN-611)	
<u>LA JOLLA</u> (SSN-701)	1970-95
<u>LOS ANGELES</u> (SSN-688)	1970-95
<u>MADDOX</u> (DD-731)	1970-95
<u>NAUTILUS</u> (SSN-571)	1970-95
<u>PARCHE</u> (SSN-683)	1970-95
<u>PATRICK HENRY</u> (SSBN-599)	1970-95
<u>PERMIT</u> (SSN-594)	1970-95
<u>PLUNGER</u> (SSN-595)	1970-95
<u>POGY</u> (SSN-647)	1970-95
<u>POLLACK</u> (SSN-603)	1970-95
<u>ROBERT E LEE</u> (SSBN-601)	1970-95
<u>SEA CLIFF</u> (DSV-4)	1970-95
<u>SEA WOLF</u> (SSN-575)	1970-95
<u>SHARK</u> (SSN-591)	1970-95
<u>SNOOK</u> (SNN-592)	1970-95
<u>TAUTOG</u> (SSN-639)	1970-95
<u>TOG BARGE</u> (YC-1321)	1970-95
<u>TURTLE</u> (DSV-3)	1970-95
<u>YFN-1224</u>	1970-95
<u>YFN-1237</u>	1970-95

Job Duties: Plaintiff overhauled motor/generators transported in the shop building by overhead cranes. Plaintiff disassembled, cleaned, varnished, reassembled, and tested the motor-generators. Plaintiff recalls the cranes in the shipyard and buildings were WESTINGHOUSE ELECTRIC and were in operation 24 hours. Plaintiff recalls working in close proximity to machinists, laborers and other trades. Plaintiff worked on GENERAL ELECTRIC and WESTINGHOUSE ELECTRIC CORP. generators. Plaintiff recalls using GENERAL ELECTRIC, WESTINGHOUSE ELECTRIC, and BELDEN wire and cable. Plaintiff used CUTLER-HAMMER wire and cable. Plaintiff recalls while performing his duties, he did not wear a mask. Plaintiff recalls supervisor Paul Fritz and coworkers Gene Madrid, address unknown and Gene Peterson, address unknown.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U. S. Department of Defense	Mare Island Naval Shipyard Shipyard, Building 866 Vallejo, CA	Shop Planner	1976-1982

Job Duties: Plaintiff procured all materials for nuclear electrical work required for reactor compartment and artillery machinery room installation and repairs on submarines. Plaintiff went to the various trade shops to get materials for the workers to install. Plaintiff performed his duties in close proximity to pipefitters, sail makers, ladders, riggers, welders, machinists, laborers and other trades. Plaintiff recalls retrieving materials from Shop 41(boilers) and Shop 64 (lagers). Plaintiff recalls Ed Schultze, supervisor, address unknown.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U. S. Department of Defense	Mare Island Naval Shipyard Shipyard, Building 866 Vallejo, CA	Ship Scheduler	1982-1995

Job Duties: Plaintiff recalls going on “ship sightings” to ascertain what equipment needed to be removed and repaired. Plaintiff crawled on and around pipe that had been insulated with asbestos cloth and cement. Plaintiff recalls disturbing the asbestos insulation. Plaintiff ‘s work clothes and body were covered with dust. Plaintiff recalls the following ships: ASPRO (SSN-648); BARB (SSN-596); GEORGE WASHINGTON (SSN-598); GUARDFISH (SSN-612); GUIARRO (SSN-665); HADDOCK (SSN-621); HALIBUT (SSGN-587; SSN-587); LA JOLLA (SSN-701); LOS ANGELES (SSN-688); PARCHE (SSN-683); PERMIT (SSN-594); PLUNGER (SSN-595); POGY (SSN-647); POLLACK (SSN-603); ROBERT E LEE (SSBN-601); SEA WOLF (SSN-575); and the SHARK (SSN-591). Plaintiff recalls his supervisors were Bud Gross, Vallejo, California and Richard Estes c/o Brayton ♦ Purcell.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
California Department of Transportation	Various locations in northern California	Bridge Operator	1/1995 - 12/2004

Job Duties: Plaintiff opened and closed the Delta drawbridges for passing vessels. Plaintiff swept the floor tiles at the end of his shift. Plaintiff recalls, at the Three-Mile Slough Bridge, he performed his duties in close proximity to the brakes which were located inside the bridge house. Plaintiff recalls his supervisor Mel Taguinod, address unknown. Plaintiff recalls coworker John Paul, Lockford, California.

Plaintiff: **LARRY ROBINSON**

Plaintiff's injuries: Plaintiff was diagnosed with asbestos-related pleural disease on or about 1997. Defendants: Plaintiff contends that the asbestos-containing products to which he was or may have been exposed to were manufactured, supplied, distributed, installed and/or contracted for by Defendants. Plaintiff's exposure to asbestos occurred at the following times and places, and involved exposure to dust created by the contractors and the products of the entities listed below. The exposure includes, but is not limited, to the following presently known contractors and the manufacturers and distributors of asbestos-containing products:

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Great Northern Paper Co. Millinocket, ME	Great Northern Paper Co. Millinocket, ME	Laborer	1964-1966

Job Duties: Plaintiff floated from department to department where the help was needed. Plaintiff recalls that the mill was built in 1896 and that all of the piping around him was very old. Pipefitters routinely maintained and replaced piping throughout the facility, exposing him to asbestos fibers. Plaintiff occasionally worked next to boilers that were being repaired.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
US Navy	Unknown rural location in the Philippines	Diesel Mechanic	1966-1969
	Unknown rural location in Vung Tau		

Vietnam

Unknown remote station in
Jefferson County
Washington

Home Station
US Navy,
Norfolk, Virginia

Job Duties: Plaintiff maintained and overhauled small portable generators manufactured by GM. Plaintiff set up remote stations in the above listed locations. Plaintiff regularly changed FLEXITALLIC spiral wound gaskets. Plaintiff was not provided with any form of protective equipment or gear. Plaintiff recalls working with coworker James Krider, address unknown; Joe Micknick; address unknown; and supervisor Abraham Rosenthal.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Great Northern Paper Co. Millinocket, ME	Grant Northern Paper Co. Millinocket, ME	Pipefitter	1969-1975

Job Duties: Plaintiff originally worked making glossy paper by putting the coating on it to make it shine. Plaintiff then started his pipefitter apprenticeship and went on to become a pipefitter. As a pipefitter, plaintiff worked in teams of two with another pipefitter around the steam plant repairing and maintaining piping on BABCOCK & WILCOX boilers and GENERAL ELECTRIC and WESTINGHOUSE turbines used to generate electricity throughout the mill. Plaintiff used gaskets manufactured by GARLOCK, JOHNS-MANVILLE and FLEXITALLIC. Plaintiff used packing manufactured by JOHN CRANE and JOHNS-MANVILLE. Plaintiff often removed insulation pads. Plaintiff worked throughout the entire mill in places where cellulose fiber was made and in the wood yard. Plaintiff repaired valves, piping systems, and pumps all over paper mill but mostly in the steam plant.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
US Dept. of Defense	Puget Sound Naval Shipyard, Bremerton WA <u>ABRAHAM LINCOLN</u> (CVN-72)	Pipefitter	1975-2004

ABRAHAM LINCOLN
(SSBN-602)

ALEXANDER
HAMILTON
(SSBN-617)

ANDREW JACKSON
(SSBN-619)

STONEWALL JACKSON
(SSBN-634)

ARCHERFISH
(SSN-678)

ARKANSAS
(CGN-41)

BAINBRIDGE
(CGN-25)

BARB
(SSN-596)

WILLIAM H. BATES
(SSN-680)

BERGALL
(SSN-667)

BLUEBACK
(SS-581)

BON HOMME RICHARD
(CVA-31)

CALIFORNIA
(CGN-36)

CAMDEN
(AOE-2)

CARL VINSON

(CVN-70)

CONSTELLATION
(CVA-64)

CORAL SEA
(CVB-43)

DANIEL BOONE
(SSBN-629)

DANIEL WEBSTER
(SSBN-626)

DARTER
(SS-576)

ENGLAND
(DLG-22)

ESSEX
(CV-9)

ETHAN ALLEN
(SSBN-608)

FLASHER
(SSN-613)

FORRESTAL
(CVA-59)

FOX
(DLG-33)

GATO
(SSN-615)

GEORGE WASHINGTON
(SSBN-598)

GRAYBACK
(SSG-574)

GUARDFISH
(SSN-612)

GUDGEON
(SS-567)

GUITARRO
(SSN-665)

GURNARD
(SSN-662)

HADDO
(SSN-604)

HAWKBILL
(SSN-666)

JOHN ADAMS
(SSBN-620)

JOHN C. STENNIS
(CVN-74)

JOHN MARSHALL
(SSBN-611)

KITTY HAWK
(CVA-63)

GLENALD P.LIPSCOMB
(SSN-685)

LONG BEACH
(CGN-160)

MARIANO G. VALLEJO
(SSBN-658)

MARSHALL
(DD-676)

L. MENDELL RIVERS
(SSN-686)

MICHIGAN
(SSBN-727)

NATHAN HALE
(SSBN-623)

NIMITZ
(CVN-68)

OHIO
(SSBN-726)

PARCHE
(SSN-683)

PATRICK HENRY
(SSBN-599)

PEGASUS
(PHM-1)

PERMIT
(SSN-594)

PINTADO
(SSN-672)

POGY
(SSN-647)

POLLACK
(SSN-603)

PUFFER
(SSN-652)

PULLACK
(SSN-603)

QUEENFISH
(SSN-651)

RAY
(SSN-653)

ROBERT E. LEE
(SSBN-601)

SACRAMENTO
(AOE-1)

SAM HOUSTON
(SSBN-609)

SCAMP
(SSN-598)

SCULPIN
(SSN-590)

SNOOK
(SSN-592)

STURGEON
(SSN-637)

SUNFISH
SSN-649

TAUTOG
(SSN-639)

TEXAS
(CGN-39)

THEODORE
ROOSEVELT
(SSBN0600)

THOMAS JEFFERSON
(SSBN-618)

TRUXTON
DLGN-39

ULYSSES S. GRANT
(SSBN-631)

VIRGINIA

(CGN-38)

WILL RODGERS

(SSBN-659)

WILLIAM H. STANDLEY

(CG-32)

Job Duties: Plaintiff worked on various ships and submarines repairing, replacing and modifying piping systems both on nuclear and non nuclear ships. Plaintiff specifically worked in the engine rooms, fire rooms and reactor rooms. In each of these vicinities, plaintiff replaced valves and modified piping. Plaintiff changed gaskets in steam traps. Plaintiff worked in close proximity of other pipefitters, ladders, machinists, electricians and painters who were regularly blowing around asbestos dust. Plaintiff recalls working with GENERAL ELECTRIC and WESTINGHOUSE turbines and that ships were insulated with JOHNS-MANVILLE insulation.

Plaintiff: **DONALD HUNTER**

Plaintiff's injuries: Plaintiff was diagnosed with asbestos-related pleural disease on or about 01/15/2007, and Asbestosis on or about 06/22/2006. Defendants: Plaintiff contends that the asbestos-containing products to which he was or may have been exposed to were manufactured, supplied, distributed, installed and/or contracted for by Defendants. Plaintiff's exposure to asbestos occurred at the following times and places, and involved exposure to dust created by the contractors and the products of the entities listed below. The exposure includes, but is not limited, to the following presently known contractors and the manufacturers and distributors of asbestos-containing products:

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
U.S. Navy	Naval Training Center Great Lakes, IL	Trainee	1947
	Naval Air Station San Diego San Diego, CA	Boiler Mechanic	1947-1954
	<u>USS SPERRY (AS-12)</u>		1947-1951
	<u>USS WADLEIGH</u> (DD-689)		1951-1954

Naval Station Newport, RI	Guard	1954-1956
Naval Station Newport, RI	Boiler Mechanic	1956-1958
<u>USS LEONARD MASON</u> (DD-852)		1956-1958
Long Beach Naval Shipyard Long Beach, CA		1958-1961
<u>USS SAINT PAUL</u> (CA-73)		1958-1959
<u>USS FRONTIER</u> (AD-25)		1959-1960
<u>USS BRYCE CANYON</u> (AD-36)		1960-1961
<u>USS COLLETT</u> (DD-730)		1961
<u>USS HELENA</u> (CA-75)		1961
Norfolk Naval Shipyard Norfolk, VA		1961-1965
<u>USS FREMONT</u> (APA-44)		1961-1965
Naval Training Center Great Lakes, IL	Recruiter	1965-1966

Job Duties: Plaintiff worked on distilling systems aboard the USS SPERRY (AS-12). Plaintiff removed asbestos insulation on steam lines in order to repair leaking pipes. Plaintiff reinstalled asbestos insulation. Plaintiff mixed and applied asbestos mud on distillers and pipes. Plaintiff used an asbestos covered tube to scrub and clean the insides of evaporating tanks. Plaintiff also worked on FOSTER WHEELER boilers. Plaintiff installed, repaired and repacked CRANE CO. valves and DELAVAL pumps. Plaintiff cut and installed GARLOCK gaskets. Plaintiff recalls coworkers: Bill Peterson, San Diego, California; Alan Dennis Ruly, Atlantic City, New Jersey.

Aboard the USS WADLEIGH (DD-689), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on BABCOCK & WILCOX boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold

covers. Plaintiff then installed new FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation. Plaintiff repaired and repacked DELAVAL pumps. Plaintiff recalls coworkers: Joe Murphy, San Diego, California; Stanley Cronenwett, Shelby, Ohio; Larry Cronenwett, Shelby, Ohio.

At the U.S. Naval Station in Newport, Rhode Island, plaintiff worked as a prison guard. Plaintiff stood watch over and escorted prisoners.

Aboard the USS LEONARD F. MASON (DD-852), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on BABCOCK & WILCOX boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold covers. Plaintiff then installed new FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation.

Aboard the USS SAINT PAUL (CA-73), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on BABCOCK & WILCOX boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold covers. Plaintiff then installed new FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation. Plaintiff repaired and repacked CRANE valves.

Aboard the USS FRONTIER (AD-25), plaintiff worked as a boiler repairman. Plaintiff did not perform work on this ship, but from this ship he boarded other ships on a daily basis to perform boiler repair work. Plaintiff removed and reinstalled block insulation in boilers. Plaintiff installed new tubes in boilers. Plaintiff used hand tools to scrape away old gaskets from manhole and handhold covers and burners and installed new ones. Plaintiff installed FLEXITALLIC gaskets. Plaintiff repaired and repacked valves. Plaintiff used BELMONT and JOHN CRANE packing.

Aboard the USS BRYCE CANYON (AD-36), plaintiff worked as a boiler repairman. Plaintiff did not perform work on this ship, but from this ship he boarded other ships on a daily basis to perform boiler repair work. Plaintiff removed and reinstalled block insulation in boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to scrape away old gaskets from manhole and handhold covers and burners. Plaintiff installed FLEXITALLIC gaskets. Plaintiff repaired and repacked valves. Plaintiff used BELMONT and JOHN CRANE packing.

Aboard the USS COLLETT (DD-730), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on BABCOCK WILCOX boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold covers. Plaintiff installed FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation. Plaintiff repaired and repacked DELAVAL and WARREN pumps. Plaintiff

performed maintenance work on GRISCOM distillers. Plaintiff recalls working in the vicinity of WESTINGHOUSE turbines while they were being serviced.

Aboard the USS HELENA (CA-75), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on BABCOCK WILCOX boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold covers. Plaintiff installed FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation. Plaintiff repaired and repacked CRANE valves.

Aboard the USS FREMONT (APA-44), plaintiff worked in the boiler room. Plaintiff performed maintenance and repair work on FOSTER WHEELER boilers. Plaintiff removed and replaced tubing in boilers. Plaintiff used hand tools to remove old gaskets on manhole and handhold covers. Plaintiff installed FLEXITALLIC gaskets. Plaintiff removed and reinstalled insulation on steam lines during repairs to leaking pipes. Plaintiff recalls installing JOHNS MANVILLE insulation. Plaintiff repaired and repacked FAIRBANKS-MORRIS, DELAVAL and WORTHINGTON pumps.

At the Great Lakes Naval Training Center plaintiff worked as a recruiter and trainer.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Finn Industries	Finn Industries Mundelein, IL	Maintenance Mechanic	1968

Job Duties: Plaintiff performed maintenance work and repairs on air powered assembly line machines. Plaintiff repaired clutches and electrical controllers on these machines.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Smith Corona Marchant, Inc.	Smith Corona Marchant, Inc. Mundelein, IL	Maintenance Mechanic	1968-1970

Job Duties: Plaintiff worked as a general maintenance and repair man. Plaintiff installed cutting and bending machines. Plaintiff unloaded trucks, operated fork lifts and installed a sprinkler system.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Sears Roebuck	Sears Roebuck	HVAC Mechanic	1968-1970

Johnstown, PA Various residential
locations in the Johnstown,
PA area

Job Duties: Plaintiff performed HVAC, plumbing, roofing and structural repairs and installations in various residential locations. Plaintiff replaced and repaired furnaces and oil burners. Plaintiff installed fire boxes that were covered with asbestos insulation. Plaintiff installed A.O. SMITH, AMERICAN STANDARD, BRYAN, LENNOX and PEERLESS water heaters and AMERICAN STANDARD, LUXAIRE, BURNHAM and LENNOX furnaces. Plaintiff cut and installed CERTAINTEED transite vent pipes. Plaintiff cut through roofs to install vent pipes. Plaintiff used BENJAMIN FOSTER mastic to secure flashings on rooftops. Plaintiff installed bathrooms and plumbing fixtures. Plaintiff installed pipes and insulation. Plaintiff installed NIBCO, RED & WHITE and BELL & GOSSETT valves. Plaintiff installed PABCO pipecovering and GOLD BOND and GEORGIA PACIFIC joint compound. Plaintiff installed BELL & GOSSETT pumps. Plaintiff installed drywall and used USG tape and premixed taping compound which he applied and sanded. Plaintiff also used USG and DURABOND premixed plaster which he applied with a trowel. Plaintiff installed roofs. Plaintiff recalls using spade shovels to remove old roofs in order to install new asbestos roofing felt, asbestos tar paper and asbestos shingles.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
Barber Heating & Air Conditioning	Barber Heating & Air Conditioning Various residential locations in the Johnstown, PA area	HVAC Mechanic	1970-1973

Job Duties: Plaintiff performed HVAC and plumbing repairs and installations in various residential locations. Plaintiff replaced and repaired furnaces and oil burners. Plaintiff installed fire boxes that were covered with asbestos insulation. Plaintiff installed A.O. SMITH, AMERICAN STANDARD, BRYAN, LENNOX and PEERLESS water heaters and AMERICAN STANDARD, LUXAIRE, BURNHAM and LENNOX furnaces. Plaintiff cut and installed CERTAINTEED transite vent pipes. Plaintiff cut through roofs to install vent pipes. Plaintiff used BENJAMIN FOSTER mastic to secure flashings on rooftops. Plaintiff installed bathrooms and plumbing fixtures. Plaintiff installed pipes and insulation. Plaintiff installed NIBCO, RED & WHITE and BELL & GOSSETT valves. Plaintiff used PABCO pipecovering and GOLD BOND and GEORGIA PACIFIC joint compound. Plaintiff installed BELL & GOSSETT pumps. Plaintiff installed drywall and used USG tape and premixed taping compound which he applied and sanded. Plaintiff also used USG and DURABOND premixed plaster which he applied with a trowel. Plaintiff recalls the supplier AMERICAN STANDARD in Johnston, Pennsylvania, JOHN T. LARKIN in Johnstown, Pennsylvania and THACKERY SUPPLY in Johnston, Pennsylvania. Plaintiff recalls coworker Roy Lynn, Windber, Pennsylvania.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
O'Connell	O'Connell Various residential locations in the Jamestown, PA area	HVAC Mechanic	1975

Job Duties: Plaintiff performed HVAC and plumbing repairs and installations in various residential locations. Plaintiff replaced and repaired furnaces and oil burners. Plaintiff installed fire boxes that were covered with asbestos insulation. Plaintiff installed A.O. SMITH, AMERICAN STANDARD, BRYAN, LENNOX and PEERLESS water heaters and AMERICAN STANDARD, LUXAIRE, BURNHAM and LENNOX furnaces. Plaintiff cut and installed CERTAINTEED transite vent pipes. Plaintiff cut through roofs to install vent pipes. Plaintiff used BENJAMIN FOSTER mastic to secure flashings on rooftops. Plaintiff installed bathrooms and plumbing fixtures. Plaintiff installed pipes and insulation. Plaintiff installed NIBCO, RED & WHITE and BELL & GOSSETT valves. Plaintiff used PABCO pipecovering and GOLD BOND and GEORGIA PACIFIC joint compound. Plaintiff installed BELL & GOSSETT pumps. Plaintiff installed drywall and used USG tape and premixed taping compound which he applied and sanded. Plaintiff also used USG and DURABOND premixed plaster which he applied with a trowel. Plaintiff recalls the supplier AMERICAN STANDARD in Johnston, Pennsylvania, JOHN T. LARKIN in Johnstown, Pennsylvania and THACKERY SUPPLY in Johnston, Pennsylvania. Plaintiff recalls coworker Fred Noon, deceased. .