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**ORIGINAL FILED**  
MAY 06 2004  
**LOS ANGELES  
SUPERIOR COURT**


7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**  
9

10 ROBERT TREGGETT and LINDA )  
11 TREGGETT, )  
12 Plaintiffs, )  
13 vs. )  
14 ALFA LAVAL INC., et al. )  
15 Defendants. )  
16

Case No. BC 307 058  
**PLAINTIFFS' CASE REPORT**  
Dept. 13  
Trial Date: September 8, 2004

17 Plaintiffs submit this case report for consideration.

18  
19 DATED: 5/6/04

WATERS & KRAUS, LLP  
By:   
Erika Brauch  
Attorneys for Plaintiffs

**COPY**

**CASE REPORT**

Injured/Deceased: ROBERT TREGGETT LASC Case No. BC 307 058  
Social Security No.: [REDACTED] 9333 Trial Date: September 8, 2004  
Wrongful Death Clmt: Not Applicable MSC Date: N/A  
FSC Date: N/A  
Age/DOB/DOD: [REDACTED] 44 (59 years) Plaintiff Counsel: Waters & Kraus LLP  
Dependents: LINDA TREGGETT

**PLAINTIFF MEDICAL INFORMATION**

Primary Doctor: [REDACTED] Date Diagnosed: [REDACTED]

Diagnosis: Mesothelioma

CXR Findings (include dates, if multiple): See Attachment "C", Medical Records

ILO Rating: See Attachment "C", Medical Records

PFT Findings: See Attachment "C", Medical Records

PFT Readings: See Attachment "C", Medical Records

(1) FVC \_ FEV \_ FEF \_ VC \_ TLC \_ RV \_ DLCO \_ Date \_

(2) FVC \_ FEV \_ FEF \_ VC \_ TLC \_ RV \_ DLCO \_ Date \_

(3) FVC \_ FEV \_ FEF \_ VC \_ TLC \_ RV \_ DLCO \_ Date \_

Pleural changes only? \_\_\_ Pulmonary Function Normal? \_\_\_

Smoking History (Pack Years) : Plaintiff is a lifetime non-smoker.

Retirement Status/Reason: not applicable.

Wage Loss: Yes, in an amount yet to be quantified. Comp Lien: No Amount: N/A

**EXPOSURE HISTORY** (Attach additional sheets, if necessary)

DATES: LOCATION/JOB SITES: OCCUPATION:  
SEE ATTACHMENT "A"

**PRODUCT IDENTIFICATION**

Attach a list of each product site or contractor identification witness upon which plaintiff intends to rely at trial of this matter. For each such witness state:

1. full name;
2. last known address or, if represented, the name and address of the witness' attorney (you need not list such address if it is a matter which is considered to be confidential, but in such event you will be deemed to have represented to both the court and counsel that you will produce such witness for deposition at a reasonably designated place and time);
3. each defendant's product or asbestos containing product the witness will identify;
4. each place of exposure where the witness will identify a defendant's product or products;
5. each contractor the witness will identify; and
6. the time period to which each identification applies.

To the extent that plaintiff lists a place or source of exposure in the "Exposure History" section of this form, but does not list a product site or contractor identification witness for such place, then both the court and counsel may assume that no exposure is claimed at such place. If plaintiff is relying upon product site or contractor identification testimony which the witness has previously given by deposition, then please list the court caption, the date and place of each such deposition for each such witness and the name and address of the person who, if requested, will make available to defendants' counsel a copy thereof.

SEE ATTACHMENTS "A" and "B"

**ANSWERS TO INTERROGATORIES:**

Have any of the plaintiff's answers to interrogatories which have heretofore been submitted concerning the plaintiff's or plaintiff's decedent's exposure to asbestos containing products, the identification of such products, medical treatment, diagnosis of asbestos-related disease, or special damages, changed in any way? If so, on a separate sheet please identify and briefly describe each such change.

SEE ATTACHMENTS "A" and "B"

**MEDICAL REPORTS:**

Attach a copy of all medical reports describing or referring to the plaintiff's (or decedent's) medical condition or circumstances upon which plaintiff intends to rely at trial.

SEE ATTACHMENT "C"

Records in excess of 50 pages or more are equally available to all defendants at the following facilities:





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**REMAINING DEFENDANTS:**

Attach a list of all remaining defendant parties to this lawsuit against whom plaintiff intends to proceed (named defendants not listed, and all Doe defendants, will be dismissed as of the date of the MSC).

SEE ATTACHMENT "D"

**SETTLEMENTS AND DEMANDS:**

Prior Settlements – Attach a list identifying all prior settlements indicating each defendant that has settled and the amount it paid.

Settlement Demand – Defendants (attach additional sheets if necessary)

Defendant	Settlement Demand	Settlement Amount (if settled)

SEE ATTACHMENT "E"



CASE REPORT  
ATTACHMENT A – EXPOSURE HISTORY

Robert Treggett, et. al. v. Alfa Laval, Inc., et al.

<u>Employer</u>	<u>Location of Exposure</u>	<u>Job Title</u>	<u>Exposure Dates</u>
United States Navy	While in the U.S. Navy, Mr. Treggett served aboard the following naval vessels and sites:  Various U.S. Navy training facilities including Great Lakes, Illinois; Vallejo, California; Idaho Falls, Idaho; New London, Connecticut; and San Diego, California  USS John Marshall (SSB(N)-611)	Nuclear Machinist's Mate	1965 - 1972
Southern Pacific Rail Road	West Colton, California to Yuma, Arizona	Brake Mechanic and Locomotive Engineer	1972 - 1990
Self – Home Remodel	Tarzana, California	Not Applicable	1974 - 1975

Plaintiffs contend that ROBERT TREGGETT was exposed to asbestos-containing products through his employment with the United States Navy and Southern Pacific Rail Road, as well as a home remodeler from approximately 1965 to 1990. ROBERT TREGGETT recalls frequent and continuous exposure to asbestos-containing products throughout his career with the United States Navy and Southern Pacific Rail Road and while performing home remodeling, which exposure lasted from 1965 to 1990. Plaintiff was exposed to various asbestos-containing products consisting of pumps, compressors, turbines, valves, gaskets, purifier, motors, generators, steam traps and asbestos blankets during his employment as nuclear machinist's mate for the United States Navy from 1965 to 1972. Plaintiff was also exposed to various asbestos-containing products consisting of brakes and locomotive engines from 1972 to 1990 while working as a brake mechanic and locomotive engineer for Southern Pacific Rail Road. Additionally, Plaintiff was exposed to joint compound while performing home remodeling work at his father's home in Tarzana, California from 1974 to 1975. Plaintiff believes that he was repeatedly and frequently exposed to asbestos from the various asbestos containing products listed below throughout the time he worked as a: (1) nuclear machinist's mate for the United States Navy (1965-1972); (2) brake mechanic and locomotive engineer for Southern Pacific Rail Road (1972-1990); and (3) home remodeler of his father's home (1974-1975).

During this period, ROBERT TREGGETT worked with and/or around asbestos-containing products on a repeat and continuous basis at numerous different sites. While in the U.S. Navy, Mr. Treggett served aboard the USS John Marshall (SSB(N)-611). Additionally, Plaintiff underwent training at the following sites: Various U.S. Navy training facilities including Great Lakes, Illinois; Vallejo, California; Idaho Falls, Idaho; New London, Connecticut; and San Diego, California. Plaintiff ROBERT TREGGETT also recalls that he worked with and/or around asbestos-containing products on a frequent basis while working for Southern Pacific Rail Road at numerous sites between West Colton, California to Yuma, Arizona. Plaintiff recalls that his home remodeling project was completed in Tarzana, California.

Plaintiff ROBERT TREGGETT recalls the following manufacturers, distributors and suppliers of asbestos-containing products to which he was exposed throughout this period of employment and while performing home remodeling work: IMO INDUSTRIES, INC. Delaval pumps, THE GORMAN-RUPP COMPANY Gorman-Rupp pumps, STERLING FLUID SYSTEMS Peerless pumps, VIACOM, INC. Westinghouse pumps, VIKING pumps, THE EATON CORPORATION Vickers pumps, IMO INDUSTRIES, INC. Warren pumps, WORTHINGTON pumps, INGERSOLL RAND COMPANY compressors, VIACOM, INC. Westinghouse turbines, CRANE Co. valves, YARWAY CORPORATION valves, FLEXITALLIC gaskets, GARLOCK gaskets, IMO INDUSTRIES, INC. Delaval purifiers, ALFA LAVAL Sharples purifier, VIACOM, INC. Westinghouse motors, VIACOM, INC. Westinghouse generators, YARWAY steam traps, ASBESTON blankets, ALCO brakes, BENDIX brakes, GM/AC DELCO brakes, NITRAM ENERGY, INC. ALCO locomotives, GENERAL ELECTRIC locomotives, ENPRO INDUSTRIES, INC. Fairbanks Morse locomotives, GENERAL MOTORS locomotives and KELLY-MOORE PAINT COMPANY, INC. Paco Quik-Set joint compound. Plaintiff was also exposed to asbestos fiber sold, supplied and distributed by PHILLIPS ELECTRONICS/T H AGRICULTURE & NUTRITION LLC Thompson-Hayward Chemical Co. used in KELLY-MOORE\_PAINT COMPANY, INC. Paco Quik-Set joint compound.



CASE REPORT  
ATTACHMENT B – PRODUCT IDENTIFICATION WITNESSES

Robert Treggett, et. al. v. Alfa Laval, Inc., et al.

ROBERT TREGGETT

1. Witness Name: Robert Treggett (Live or via deposition taken in this action)
  
2. Address: 2220 164th Place, S.E., Bothell, Washington 98012.
  
3. Defendants/Products Identified: IMO INDUSTRIES, INC. Delaval pumps, THE GORMAN-RUPP COMPANY Gorman-Rupp pumps, STERLING FLUID SYSTEMS Peerless pumps, VIACOM, INC. Westinghouse pumps, VIKING pumps, EATON CORPORATION Vickers pumps, IMO INDUSTRIES, INC. Warren pumps, WORTHINGTON pumps, INGERSOLL RAND COMPANY compressors, VIACOM, INC. Westinghouse turbines, CRANE Co. valves, YARWAY CORPORATION valves, FLEXITALLIC gaskets, GARLOCK gaskets, IMO INDUSTRIES, INC. Delaval purifiers, ALFA LAVAL, INC. Sharples purifier, VIACOM, INC. Westinghouse motors, VIACOM, INC. Westinghouse generators, YARWAY steam traps, ASBESTON blankets, ALCO brakes, BENDIX brakes, GM/AC DELCO brakes, NITRAM ENERGY, INC. ALCO locomotives, GENERAL ELECTRIC locomotives, ENPRO INDUSTRIES, INC. Fairbanks Morse locomotives, GENERAL MOTORS locomotives and KELLY-MOORE PAINT COMPANY, INC. Paco Quik-Set joint compound. Plaintiff was also exposed to asbestos fiber sold, supplied and distributed by PHILLIPS ELECTRONICS/T H AGRICULTURE & NUTRITION LLC Thompson-Hayward Chemical Co. used in KELLY-MOORE PAINT COMPANY, INC. Paco Quik-Set joint compound.

In general, and with respect to the products identified above, Plaintiff ROBERT TREGGETT recalls and has testified that he was exposed to various asbestos-containing products consisting of pumps compressors, turbines, valves, gaskets, purifier, motors, generators, steam traps and asbestos blankets during his employment as nuclear machinist's mate for the United States Navy from 1965 to 1972. Plaintiff was also exposed to various asbestos-containing products consisting of brakes and locomotive engines from 1972 to 1990 while working as a brake mechanic and locomotive engineer for Southern Pacific Rail Road. Additionally, Plaintiff was exposed to joint compound while performing home remodeling work at his father's home in Tarzana, California from 1974 to 1975. Plaintiff believes that he was repeatedly and frequently exposed to asbestos from the various asbestos containing products listed below throughout the time he worked as a: (1) nuclear machinist's mate for the United States Navy (1965-1972); (2) brake mechanic and locomotive engineer for Southern Pacific Rail Road (1972-1990); and (3) home remodeler of his father's home (1974-1975).

Between approximately 1967 and 1972 plaintiff served in the United States Navy aboard the USS JOHN MARSHALL and at various U.S. Navy training facilities including Great Lakes, Illinois; Vallejo, California; Idaho Falls, Idaho; New London, Connecticut; and San Diego, California. During this period of employment, Plaintiff

believes he was frequently and continuously exposed to dust from asbestos-containing products, both through his own work and through the work of other shipmates working in his immediate vicinity in extremely confined spaces.

During his time as a machinist's mate in the United States Navy, Plaintiff specifically recalls and will testify to working with and/or around various Delaval, Groman- Rupp, Peerless, Vickers, Viking, Warren, Westinghouse, and Worthington pumps. Additionally, Plaintiff recalls working with and/or around various Ingersoll Rand compressors, Westinghouse turbines, as well as Crane and Yarway valves. During this period of employment, Plaintiff further recalls working with and/or around various Flexitallic and Garlock gaskets, Delaval and Sharples purifiers, and Westinghouse motors and generators. Furthermore, during this time Plaintiff worked on and/or around Yarway steam traps and Asbeston blankets. Plaintiff became familiar with the names of these products by his direct work with the products and observing name plates, labels, containers/packages and other identifying information on the equipment and products. Additionally, Plaintiff referred to an equipment list for every piece he worked on which identified the names of the manufacturers of the valves he worked on. Also, over the six months that Plaintiff was a log room yeoman, he was required to write down repairs to equipment, including the brand names of the equipment. Additionally, over the two years when Plaintiff was a spare parts petty officer, he was required to pull and gather together the parts for working on equipment when repairs were needed.

Plaintiff had many duties during his tenure as a machinist's mate in the United States Navy. Plaintiff's duties included, but were not limited to, maintenance and operation of the steam plant and associated steam auxiliary and support equipment. Plaintiff recalls and will testify that he would often be required to work on and/or around Delaval, Gorman-Rupp, Peerless, Vickers, Viking, Warren, Westinghouse, and Worthington pumps. Plaintiff's exposure to asbestos as a result of his frequent work on pumps arose as a result of breathing in respirable asbestos fibers released on a repeat and continuing basis from insulation products installed, disturbed, and/or removed on and from the foregoing pumps through his work and the work of other tradesmen working in his immediate vicinity. Plaintiff recalls and will testify that most, or nearly all, of the naval equipment he worked on and /or around, including these pumps, was insulated, and this insulation was frequently disturbed and/or applied in his presence and in his immediate vicinity. Plaintiff was also often required to remove, apply, cut or disturb asbestos containing blankets, including Asbeston blankets, to various types of naval equipment, including the foregoing pumps. Plaintiff was exposed to asbestos dust as a result of this work with these blankets. Moreover, Plaintiff was further exposed (in the particulars set forth in the following paragraph) to asbestos dust as a result of his removal and/or installation of the asbestos-containing gaskets that were supplied with the foregoing pumps and/or specified for use in the pumps by their manufacturers listed herein.

Plaintiff also recalls and will testify to working with and/or around hundreds of Crane and Yarway valves. Plaintiff's work included removing blankets, removing the hand wheel, unbolting the valve from its support, cleaning the gaskets, disassembling the valve, and cleaning the gasket material between the bonnet and the valve body – all of



which generated a great deal of dust containing asbestos fibers that Plaintiff inhaled. The valves Plaintiff worked with were lagged with a removable asbestos-containing blanket that he had to remove and reinstall, and all valves had gaskets in the flanges so they could be bolted to or removed from the associated piping. All piping was lagged.

Plaintiff recalls and testified that as a machinist's mate, he was required remove and/or replace internal and external gaskets on valves. The gaskets were either manufacturer specified or Garlock gaskets or Flexitallic gaskets. In instances where he was at sea and did not have the gaskets specified for use by the manufacturers, Plaintiff would use a Garlock gasket in the interim and was required to replace them immediately upon coming to shore with those that were specified by the manufacturer. He never worked on any equipment without referencing the repair manual, which gave directions and specified the parts to be used, including the manufacturer names. Furthermore, in this position, he was required to review literature or materials about the equipment that the machinist mates were working on. In his work with valves, he had to scrape, grind, or wire brush the gaskets off. In scraping, brushing and/or grinding the old gasket material off of the flanges, Plaintiff recalls and testified that the gasket removal work was very "dirty and dusty" and that a Plaintiff recalls and has testified to seeing and inhaling on numerous occasions throughout his career.

To insure that these pipes or valves would not leak at their flange connection to the other pipe, valve or pump flanges, Plaintiff utilized numerous Flexitallic and/or Garlock gaskets. In installing these gaskets on the flanges of both the pumps and valves he has identified above, Plaintiff recalls and will testify that he was required to first remove the existing gasket and thoroughly clean the face of the pump, valve or pipe flanges, to insure that the replacement gaskets would properly seal and the flanges would not leak. In order to clean the pump, valve or pipe flanges, Plaintiff recalls and will testify that he spent a considerable amount of time removing the old gaskets on each pump, valve or pipe flange. Plaintiff recalls and will testify that removing old gaskets was very difficult work in that these old gaskets would stick to each pump, valve or pipe flange, requiring Plaintiff to scrape or grind the stuck gasket material off with either a putty knife, air grinder or hand grinder. In scraping and/or grinding the old gasket material off of the pump, valve or pipe flanges, Plaintiff recalls and will testify that the gasket removal work was very "messy" and that a significant amount of gasket dust was created which Plaintiff recalls and will testify seeing and inhaling. Plaintiff recalls that he was required to grind off the old gasket material on approximately 50% of the occasions he did this work.

Plaintiff also recalls and will testify that in order to replace and/or maintain the Crane and Yarway valves, he would be required to disturb and/or remove insulation or lagging material from the outside of the valves he worked on. The blankets were tied on with wire, and they would cut the wire and physically unwrap the blanket. It was a very involved process, and it was very difficult to get the blankets off, which process generated a lot of dust that Plaintiff inhaled.

Plaintiff recalls and will testify that on numerous occasions throughout his career he was required to work on and/or around Ingersoll Rand compressors, Westinghouse



turbines, Delaval and Sharples purifiers, Westinghouse motors and generators and Yarway steam traps. Plaintiff's exposure to asbestos as a result of his frequent work on these products arose as a result of breathing in respirable asbestos fibers on a repeat and continuing basis from insulation and/or other asbestos containing products installed, disturbed, and/or removed through his work and the work of other tradesmen working in his immediate vicinity. Specifically, Plaintiff also recalls that compressors were equipped with gaskets that he was required to remove and replace. The installation and removal process was often dusty, and plaintiff was exposed to asbestos as a result of being required to hammer out and cut the asbestos containing gaskets that were supplied with the foregoing compressors and/or specified for use in the compressors by their manufacturers listed herein. Plaintiff was also often required to remove, apply, cut or disturb asbestos containing blankets, including Asbeston, on the foregoing purifiers. Plaintiff was exposed to asbestos dust as a result of this work with these blankets supplied with the equipment and/or specified for use by their manufacturers listed herein. Plaintiff additionally recalls exposure to asbestos as a result of the application, disturbance and removal of asbestos containing lagging applied to the casing and piping of turbines listed above. This work was frequently carried out on the turbines while plaintiff was working as a machinist's mate on or adjacent to the turbines. Specifically, plaintiff recalls being present and exposed to asbestos during a heavy period of lagging while his submarine was at the Newport News shipyard. The steam turbines were being lagged during Plaintiff's early months of service on board the USS JOHN MARSHALL at Newport News shipyard. Plaintiff continuously passed by turbines and through the dust being created as they were being lagged many times each day on his way to and from the Ingersoll Rand air compressors that Plaintiff was tasked with rebuilding. Plaintiff additionally recalls exposure to asbestos as a result of removing lagging from Westinghouse motors on board the USS JOHN MARSHALL.

Plaintiff recalls that the casing of the Yarway steam traps located on steam lines aboard the USS JOHN MARSHALL were often insulated and/or blanketed with asbestos containing products, and plaintiff was repeatedly exposed to and inhaled asbestos dust as a result of removing and/or disturbing this insulation either through his own work and/or through the work of other engine room personnel working in his immediate vicinity. Plaintiff was also exposed to asbestos as a result of the removal of asbestos containing gasketing material on the steam traps in the manner described above.

While on board the USS John Marshall, all of Plaintiff's work took place in extremely cramped quarters with no ventilation, so that he was continually breathing in the asbestos-containing dust created by his own activities and the activities of others working around him.

During his time as a locomotive engineer for Southern Pacific Railroad from 1972 to 1990, Plaintiff specifically recalls and will testify to working with and/or around various asbestos containing friction products including: Alco, Bendix, GM/AC Delco brakes, and Alco, General Electric, Fairbanks Morse and GM locomotives. At the beginning of his railroad career, Plaintiff's duties included, but were not limited to, replacing and repairing brakes. During this time, Southern Pacific phased out old cast iron brakes and replaced the same with the various asbestos containing brakes listed



above. Plaintiff recalls performing the following tasks with respect to brake replacement and repair work: handling and transporting the new brake shoes, which were typically delivered on a pallet; and preparing the new brake shoes to place on the brake rigging and removing the old brakes by hammering the brakes in and out of position with a 3-pound brake shoe hammer, which process gave off a lot of dust and which plaintiff inhaled.

Plaintiff also recalls frequent and continuous exposure to brake dust from the asbestos containing brake shoes during normal braking operations of the locomotive brakes. Specifically, after initially working as a brake mechanic for approximately six months, Plaintiff began to work as a locomotive engineer hauling freight between West Colton, California and Yuma, Arizona for Southern Pacific Railroad. In performing these duties, Plaintiff recalls and will testify to breathing in respirable asbestos fibers on a repeated and continuing basis from applying the brakes of the locomotive train which emitted a tremendous amount of brake dust that plaintiff believes he inhaled virtually every time the brakes were applied.

Between 1974 and 1975, Plaintiff performed home remodeling, including performing various drywall repairs and/or installation, on his father's home in Tarzana, California. In doing so, Plaintiff recalls and has testified to installing and repairing drywall. In installing and repairing drywall, Plaintiff utilized Paco Quik-Set joint compound. This joint compound was utilized whether Plaintiff was simply patching holes in the drywall or fabricating interior walls.

Plaintiff recalls and has testified that working with Paco Quick-Set joint compound was an extremely dusty process. Plaintiff recalls and has testified that when utilizing the dry powder form, at first, he would pour the dry powder joint compound into a bucket, creating a large cloud of dust, to which he subsequently mixed in water for use. Plaintiff breathed in this dust. Subsequently, he dipped into the fifty-pound bag with a smaller container. Plaintiff recalls and has testified to applying and sanding Paco Quick-Set joint compound, usually in confined spaces, which exposed Plaintiff to a great deal of dust from these joint compounds. Whatever joint compound he applied to the wall he also sanded. On one occasion he used a belt sander to sand it, but it destroyed the wall. Consequently, Plaintiff had to re-apply and re-sand joint compound in order to fix the wall. Subsequently, Plaintiff used sanding pads and pre-cut sandpaper to sand the joint compound. The first few times when Plaintiff was learning how to work with this product, he used too much joint compound, and even  $\frac{1}{4}$  inch too much would take hours to sand down. Plaintiff recalls and has testified that after applying and sanding various coats of this joint compound, he would often be covered from head to toe with white dust and the rooms where he was working looked like they were covered with "moon dust" – there was "white stuff everywhere." Plaintiff recalls and has testified seeing and inhaling dust from Paco Quick-Set joint compound regularly and continuously. Additionally, Plaintiff's father required him to clean up, continuously and regularly after he had completed his drywall work, which involved sweeping the floor or ground with a push broom and putting the joint compound dust and powder that had fallen onto the ground into a bin for disposal in the trash. Plaintiff recalls and has testified that the clean up process continuously and regularly created a very dusty environment. In fact, it was

“impossible to keep from building up dust” when he swept. Plaintiff recalls and testified that he inhaled the dust created during this process regularly and continuously.

4. Place of Exposure: Plaintiff has listed each place of exposure to asbestos-containing products on Attachment “A” to this Case report. ROBERT TREGGETT recalls exposure to the aforementioned products at the numerous sites he worked at during his years of employment and while performing home remodeling from 1965 to 1990. ROBERT TREGGETT specifically remembers and has testified to being exposed and seeing these asbestos-containing products throughout his career. During this period, ROBERT TREGGETT worked with and/or around asbestos-containing products on a repeat and continuous basis at numerous different sites. While in the U.S. Navy, Mr. Treggett served aboard the USS John Marshall (SSB(N)-611). Additionally, Plaintiff underwent training at the following sites: Various U.S. Navy training facilities including Great Lakes, Illinois; Vallejo, California; Idaho Falls, Idaho; New London, Connecticut; and San Diego, California. Plaintiff ROBERT TREGGETT also recalls that he worked with and/or around asbestos-containing products on a repeat and continuous basis while working for Southern Pacific Rail Road at numerous sites between West Colton, California to Yuma, Arizona. Plaintiff recalls that his home remodeling project was completed in Tarzana, California. For further clarification of this issue, please see plaintiffs’ prior responses to Los Angeles County Asbestos General Order No. 22 Standard Interrogatories.

5. Contractors Identified: None.

6. Time Period of Exposure: Plaintiff recalls working with and/or being exposed to asbestos-containing products on a frequent and repeated basis during the time frame 1965 to 1990. Plaintiffs contend that ROBERT TREGGETT was exposed to asbestos during this time period. For further clarification of this issue, please see plaintiff’s extensive deposition testimony and responses to Los Angeles County Asbestos General Order No. 22 Standard Interrogatories.

#### HERB GIFFINS

1. Witness Name: Herb Giffins (live or via deposition)

2. Address: c/o KELLY-MOORE PAINT COMPANY, INC.

3. Defendants/Products Identified: KELLY-MOORE PAINT COMPANY, INC. GEORGIA-PACIFIC joint compound; PHILLIPS ELECTRONICS/T H AGRICULTURE & NUTRITION LLC (“THAN”)Thompson-Hayward Chemical Co. asbestos fiber.

4. Place of Exposure: Mr. Giffins will testify that KELLY-MOORE PAINT COMPANY, INC. only manufactured its Paco Quik-Set joint compound product at its Dallas, Texas Plant , from 1963 to 1978, with the exception of a brief period in the "late



1960s," when it was also manufactured in the KELLY-MOORE PAINT COMPANY, INC. San Carlos, California facility. KELLY-MOORE PAINT COMPANY, INC.'s Dallas, Texas plant was supplied with asbestos fiber during this period either exclusively or "predominantly" by THAN/Thompson Hayward Chemical Co. Plaintiff's counsel are additionally in possession of verified discovery responses from KELLY-MOORE PAINT COMPANY, INC. in other asbestos litigation, as well as KELLY-MOORE PAINT COMPANY, INC. and Thompson Hayward Chemical Co. internal records and documents, including sales records, indicating that THAN/Thompson Hayward Chemical Co. exclusively supplied asbestos fiber to KELLY-MOORE PAINT COMPANY, INC. for use at its Dallas, Texas plant for use in the manufacture of Paco Quik-Set joint compound during the time of period of ROBERT TREGGETT's exposure to this product.

In sum, since all KELLY-MOORE PAINT COMPANY, INC. Quik-Set was produced by its Dallas, Texas plant, where the exclusive or "predominant" fiber supplier was THAN/Thompson Hayward Chemical Co., plaintiff was exposed to THAN/Thompson Hayward Chemical Co. asbestos fiber when he worked with and was exposed to Paco Quik-Set joint compound in the 1970s. ROBERT TREGGETT recalls and will testify that he was repeatedly exposed to KELLY-MOORE PAINT COMPANY, INC. Paco Quik-Set joint compound at various Standard Oil work sites in California between 1963 and 1978.

5. Contractors Identified: None.

6. Time Period of Exposure: 1974 to 1975.

T H AGRICULTURE & NUTRITION CORPORATE REPRESENTATIVE(S)

1. Witness Name: Corporate representative of THAN To Be Designated.

2. Address: Currently unknown.

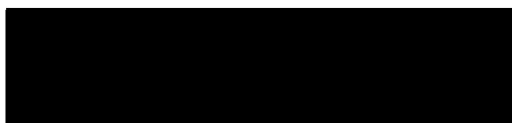
3. Defendants/Products Identified: Supply of raw asbestos fiber by PHILLIPS ELECTRONICS/T H AGRICULTURE & NUTRITION LLC")Thompson-Hayward Chemical Co. asbestos fiber. to KELLY-MOORE PAINT COMPANY, INC. for use in Paco Quik-Set joint compound.

4. Place of Exposure: Witness (whose deposition will be noticed in this case) will provide testimony concerning the supply of raw asbestos fiber KELLY-MOORE PAINT COMPANY, INC. from 1963 to 1978 for use in Paco Quik Set joint compound, as well as THAN's relationship with other companies involving the sale of asbestos fiber for use in joint compounds. Plaintiff's counsel are additionally in possession of verified discovery responses from KELLY-MOORE PAINT COMPANY, INC. in other asbestos litigation, as well as KELLY-MOORE PAINT COMPANY, INC. and THAN internal records and documents, including sales records, indicating that THAN/Thompson

Hayward Chemical Co. exclusively supplied asbestos fiber to KELLY-MOORE PAINT COMPANY, INC. for use at its Dallas, Texas plant for use in the manufacture of Paco Quik-Set joint compound during the time of period of ROBERT TREGGETT's exposure to this product. ROBERT TREGGETT recalls and will testify that he was repeatedly exposed to KELLY-MOORE PAINT COMPANY, INC. Paco Quik-Set joint compound at various Standard Oil work sites in California between 1963 and 1978.

5. Contractors Identified: None.

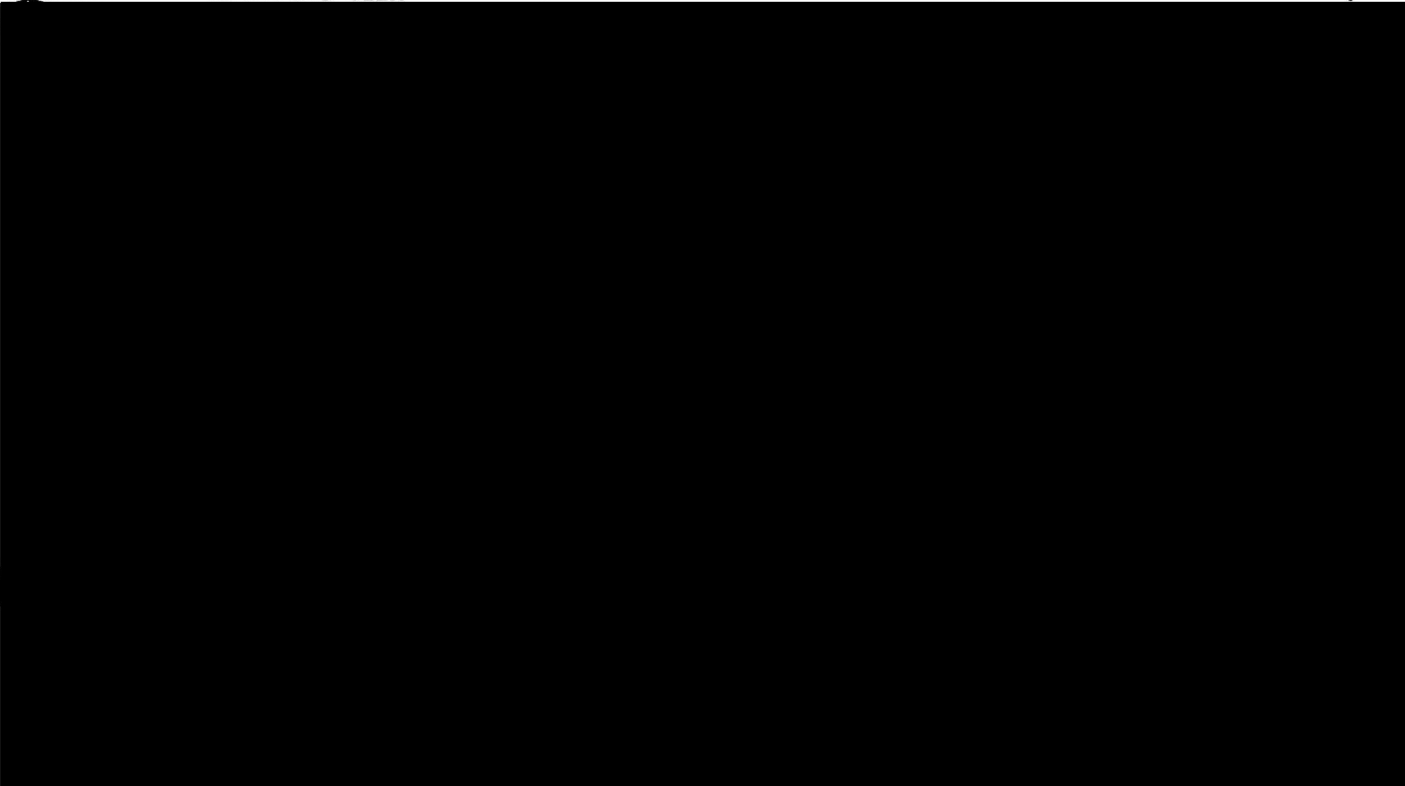
6. Time Period of Exposure: 1974 to 1975



SMOUP, WILLIAM B, MD  
12911 120TH AVE NE  
#B10  
KIRKLAND WA 98034

PATIENT: Treggett, Robert S

SSN: [REDACTED] 9333  
DOB: [REDACTED] 1944  
MRN: 0488633  
DATE: [REDACTED]  
EXAM: CHEST XRD VIEW



*agm*  
*BS*

9.9

Patient Name: TREGGETT, ROBERT

Fin. #: 0325000053

MR#: 745925

Date Examined: [REDACTED]

ER Physician: [REDACTED]

cc: [REDACTED]

TIME IN:

TIME OUT:

CHIEF COMPLAINT: [REDACTED]

[REDACTED]

SOCIAL HISTORY: Accompanied by his wife and followed by Brad Shoop, MD (SP) primarily and Julie Heyn, MD of cardiology, nonsmoker.

[REDACTED]

	<p style="text-align: right;">59</p> <p style="text-align: center;">[REDACTED]</p> <p>EMERGENCY ROOM ADMIT REPORT <i>GA</i></p>
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Patient Name: TREGGETT, ROBERT

Fin. #: 0325000053

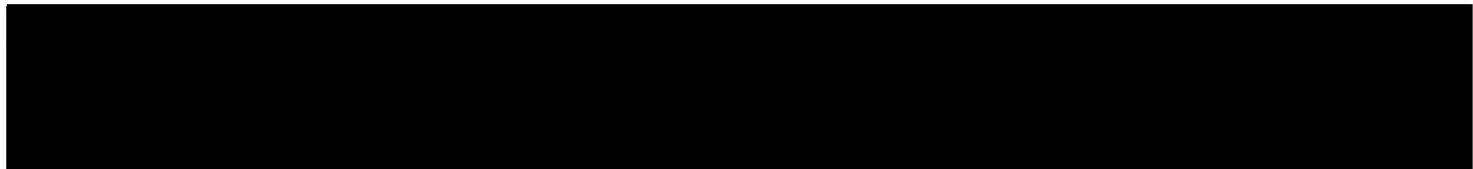
MR#: 745925

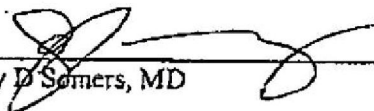
Date Examined: [REDACTED]

ER Physician: [REDACTED]

cc: [REDACTED]

PAGE 2



  
\_\_\_\_\_  
Gary D Somers, MD

MLS: 95244  
D: Mon Sep 08 13:14:33 2003 EST  
T: Mon Sep 08 13:39:46 2003 EST  
60582985

	<p>[REDACTED] 60 EMERGENCY ROOM ADMIT REPORT 60</p>
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Patient Name: TREGGETT, ROBERT

MR#: 745925

Date of Admission: 09/07/2003 10:42 AM EDT

Unit/Rm: ED ED 08

Physician: [REDACTED]

cc: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONTINUED...

[REDACTED]

[REDACTED]

HISTORY AND PHYSICAL EXAMINATION

6:

63

Patient Name: TREGGETT, ROBERT

MR#: 745925

Date of Admission: 09/07/2003 10:42 AM EDT

Unit/Rm: FD ED 08

Physician: [REDACTED]

cc: [REDACTED]

PAGE 2

SOCIAL HISTORY: The patient is married, a maintenance worker, who is around chemicals and dust with some frequency. He is a life-long nonsmoker, drinks one alcoholic beverage a week.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONTINUED...

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Patient Name: TREGGETT, ROBERT

MR#: 745925

Date of Admission: 09/07/2003 10:42 AM EDT

Uni/Rm: ED ED 08

Physician: [REDACTED]

cc: [REDACTED]

PAGE 3

[REDACTED]

*Christopher D. Beary*

Christopher D Beary, MD

MLS: 55015

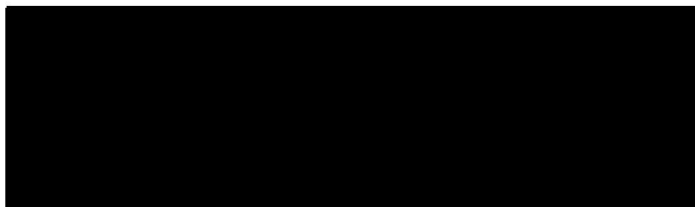
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60582189

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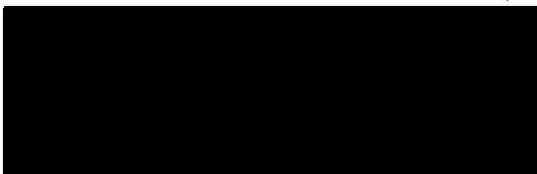
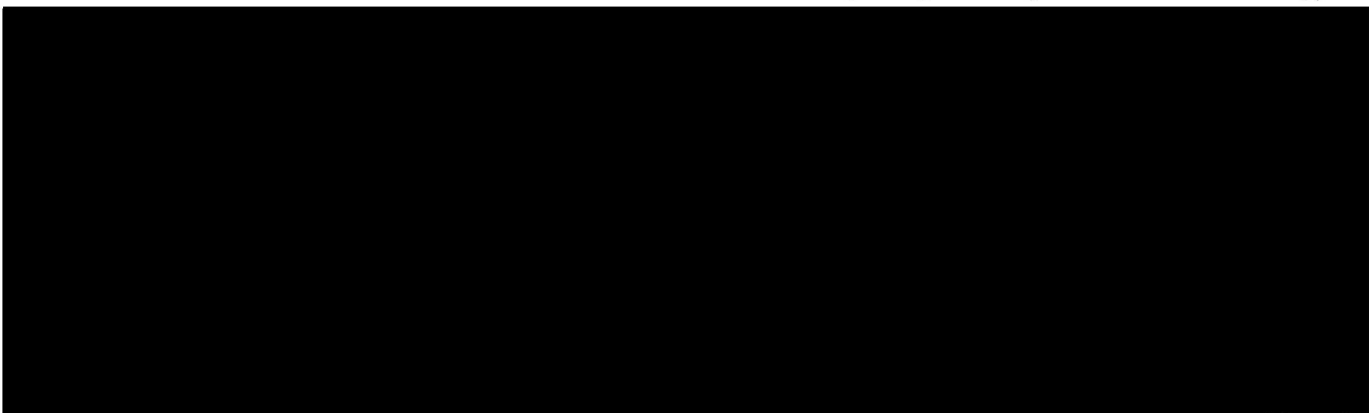


**PATIENT DIAGNOSTIC REPORT**

*Verified*

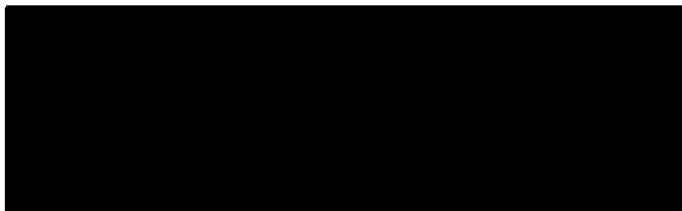
**PATIENT NAME : TREGGETT, ROBERT S**

<b>MED REC#</b> 745925	<b>BIRTHDATE</b> [REDACTED] 44	<b>SEX</b> M	<b>LOCATION</b> 514-01	<b>PHYSICIAN/S:</b> [REDACTED]
<b>SVC</b> DI	<b>PAT. TYPE</b> OBS	<b>ADDENDUM #</b> 0	<b>ORDER #</b> 1611586	<b>CC:</b> [REDACTED]
<b>ORDER DATE</b> 9/7/03 10:50:00AM		<b>COMPLETE DATE</b> 9/7/03 11:12:06AM		



82

**Dictated by:** KINDER, ERIC A.  
**Transcribed by:** DONNA DOWNING 09/08/2003 09:08  
**Verified by:** ERIC A. KINDER, MD  
**Verified on:** 9/8/03 11:38:30AM

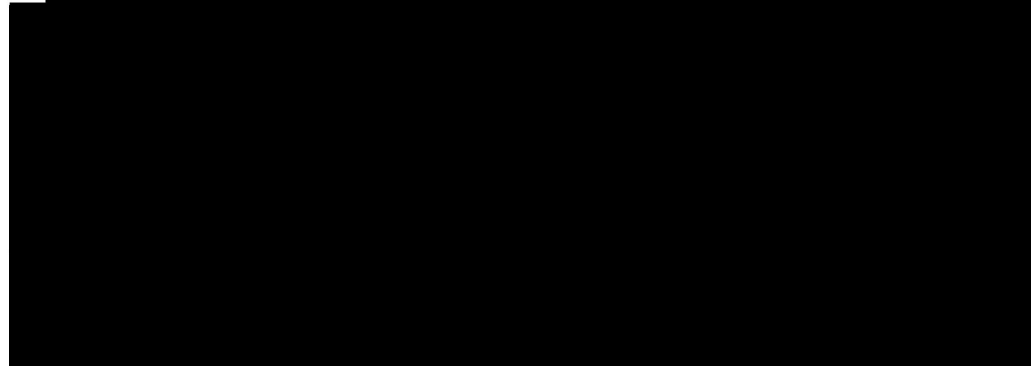
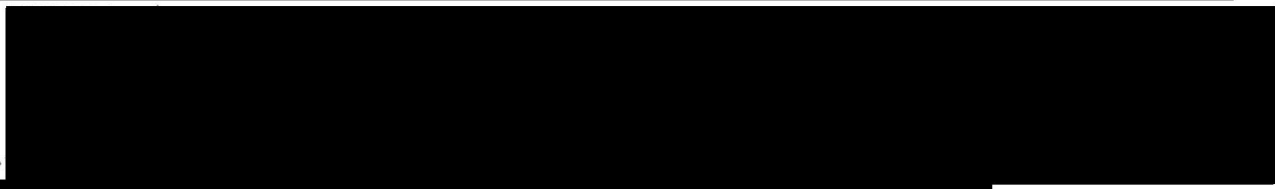


PATIENT DIAGNOSTIC REPORT

Verified

PATIENT NAME : TREGGETT, ROBERT S

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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SVC	PAT. TYPE	ADDENDUM #	ORDER #	
DI	OBS	0	1611624	
ORDER DATE		COMPLETE DATE		
9/7/03 1:17:00PM		9/7/03 1:53:43PM		



DICTATED BY: KINDER, ERIC A.  
 TRANSCRIBED BY: SHANE GAIESKY 09/07/2003 14:38  
 VERIFIED BY: ████████████████████  
 VERIFIED ON: 9/7/03 2:40:25PM

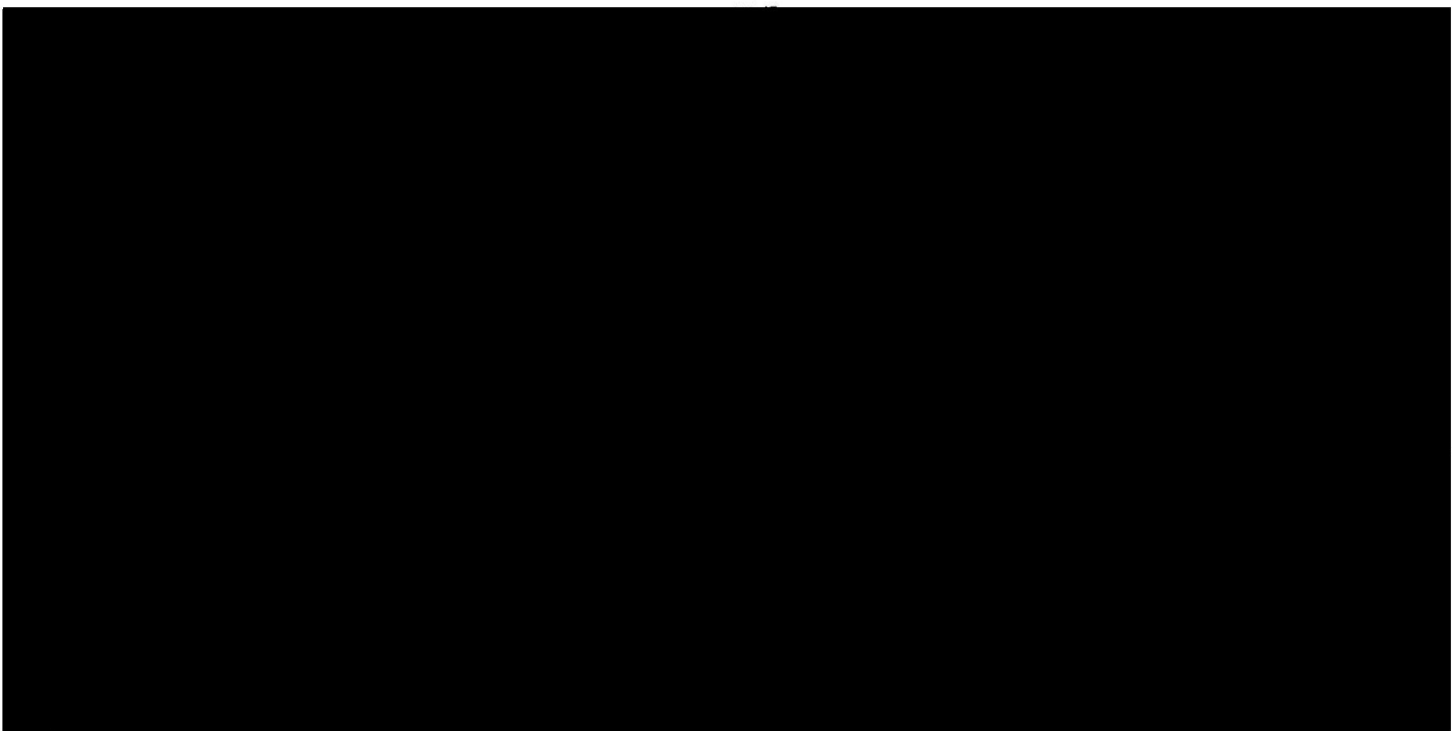
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**PATIENT DIAGNOSTIC REPORT**

*Verified*

**PATIENT NAME : TREGGETT, ROBERT S**

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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SVC	PAT. TYPE	ADDENDUM #	ORDER #	cc: DOCTOR UNKNOWN
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ORDER DATE	COMPLETE DATE			
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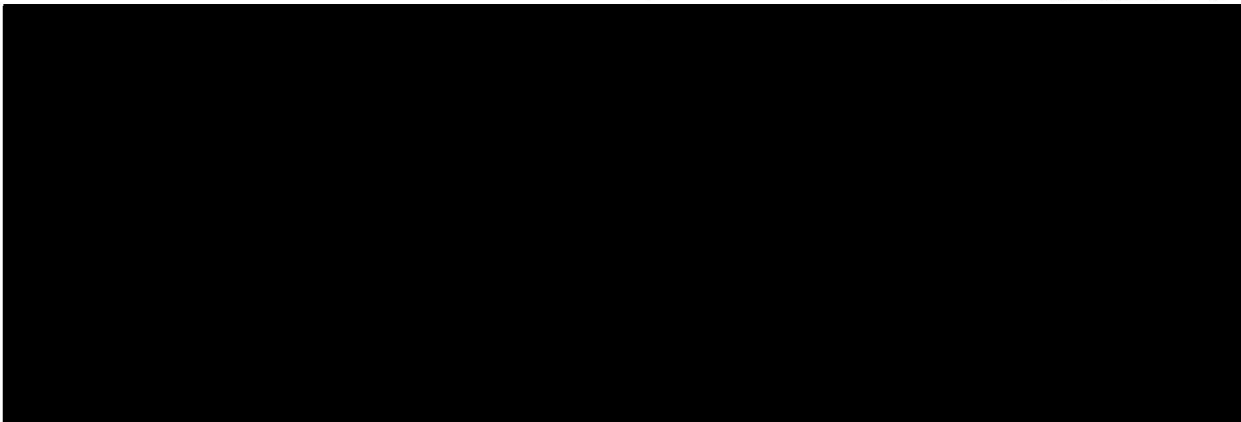


81

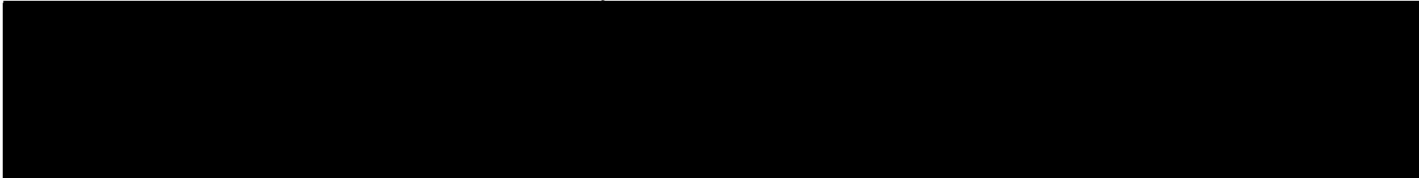
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 VERIFIED ON: 9/8/03 11:44:36AM

81



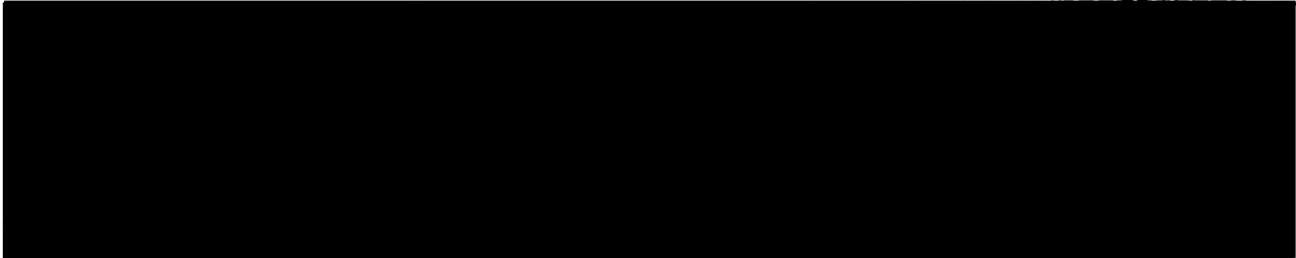


8/1



*Richard G. Patton*

RICHARD G PATTON MD, Pathologist  
(Signed 09 09 2003)



Northwest Pathology Services

RICHARD G. PATTON, MD - CHARLES R. SIMRELL, MD - ELIZABETH K. SCHMIDT, MD - ENMA SAIZ, MD - PAUL F. EDMONSON, MD

TREGGETT, ROBERT S

LOC: ULTRASOUND

M [redacted] 1944 Age: 59

DISCH. DATE: None

MR#: 0000745925

ADM#: 0325000053

PATHOLOGY REPORT

SPECIMEN OBTAINED: 09 07 2003

SPECIMEN ACCESSIONED: 09 07 2003

DATE REPORTED:

CASE #: S2003-007149

PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA. 98133-8498 - (206) 368-1779 - C.A.P. ACCRED.#24665-1

1 of 1 on 09-09-2003 at 16:15:33

**PATIENT DIAGNOSTIC REPORT**

*Verified*

**PATIENT NAME : TREGGETT, ROBERT S**

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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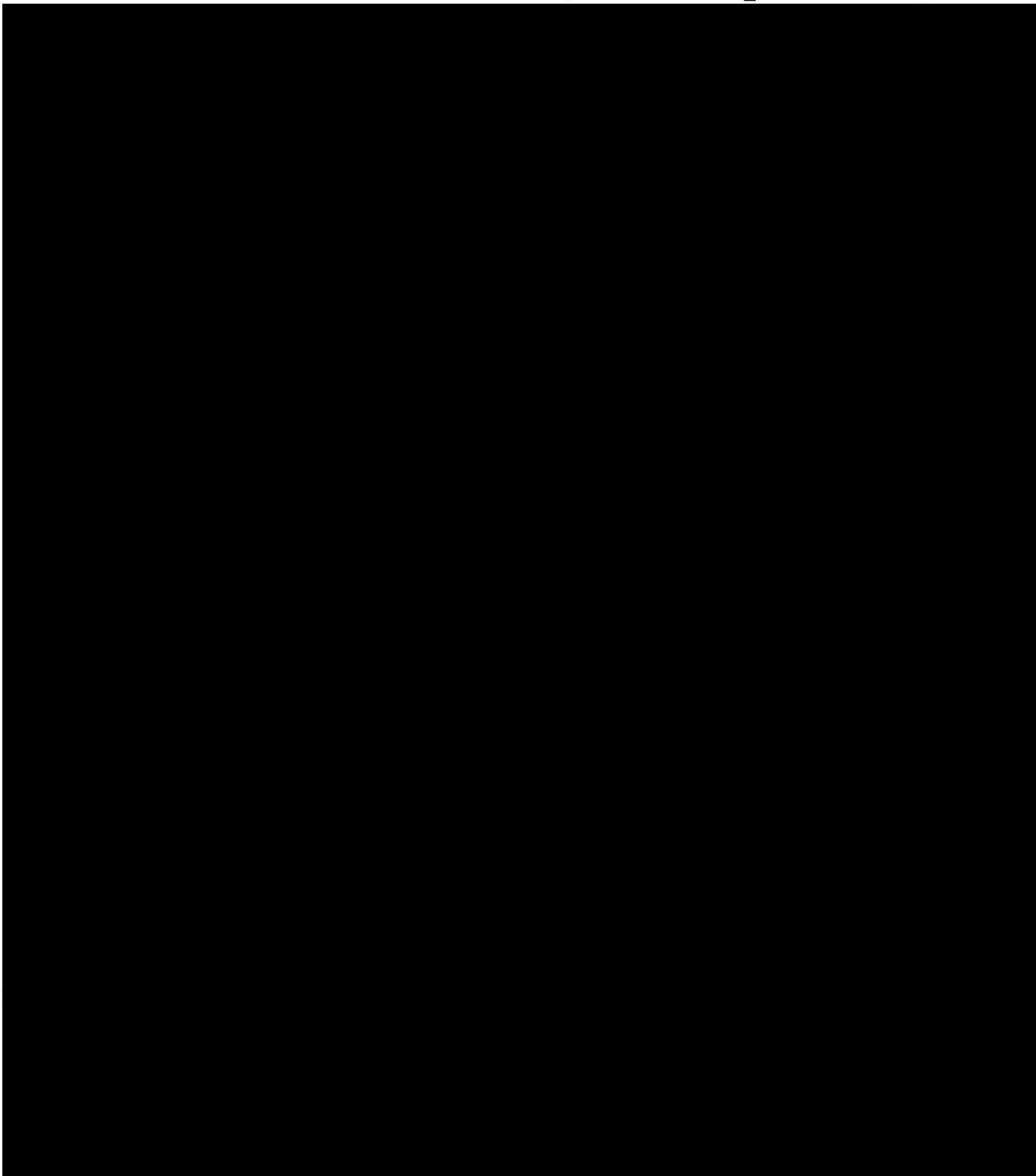
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ORDER DATE	COMPLETE DATE
9/7/03 7:06:00PM	9/7/03 7:20:12PM

DICTATED BY: KINDER, ERIC A.  
 TRANSCRIBED BY: DONNA DOWNING 09/08/2003 09:26  
 VERIFIED BY: ████████████████████  
 VERIFIED ON: 9/8/03 11:44:42AM

80



YEGGETT, ROBERT S  
GR, C BEATY  
09/07/2003 DR-W S-33P  
0000745925

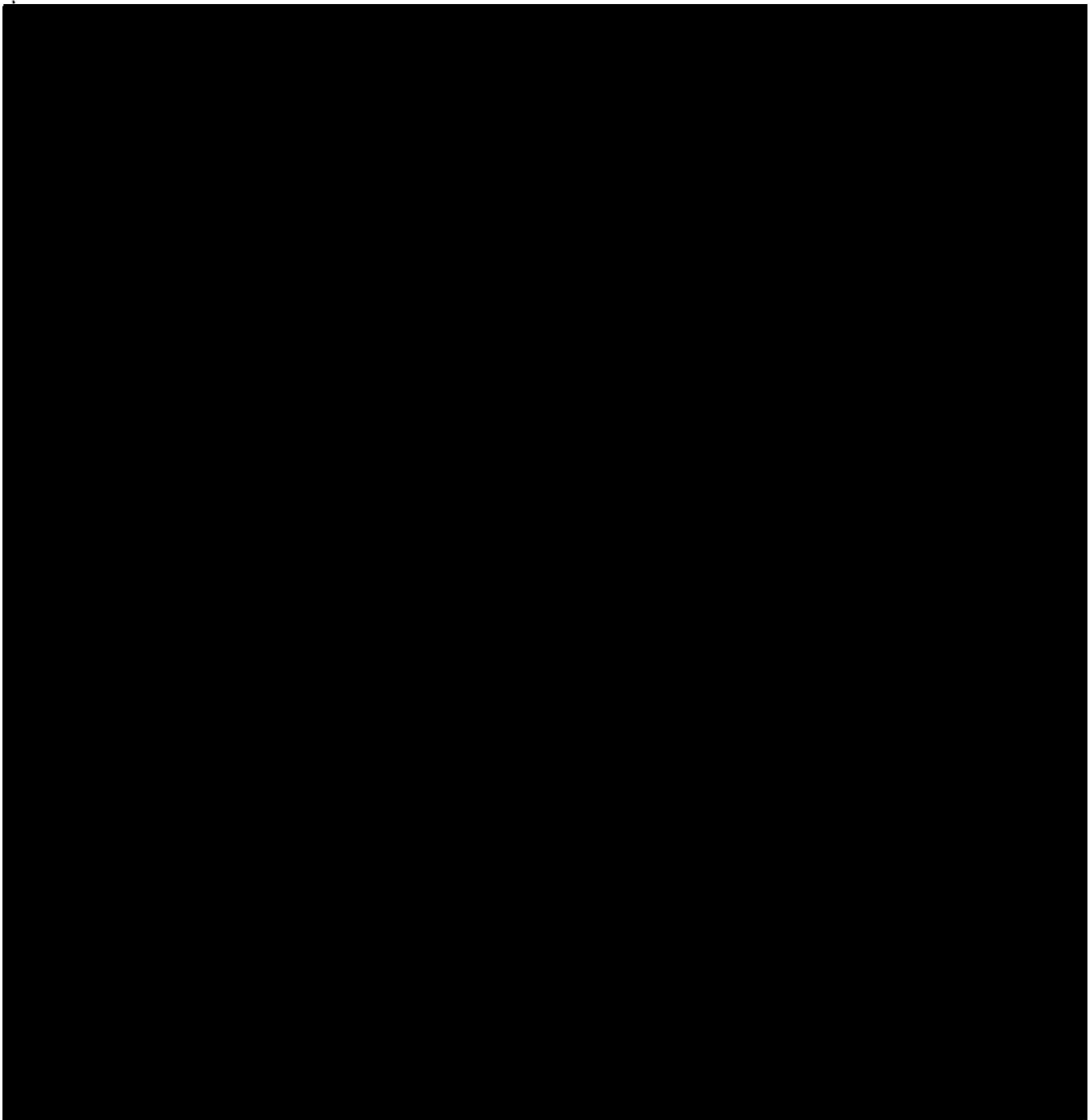


PROGRESS NOTES

M-91 (3/92)

75





*Bealy*

*Treggett*



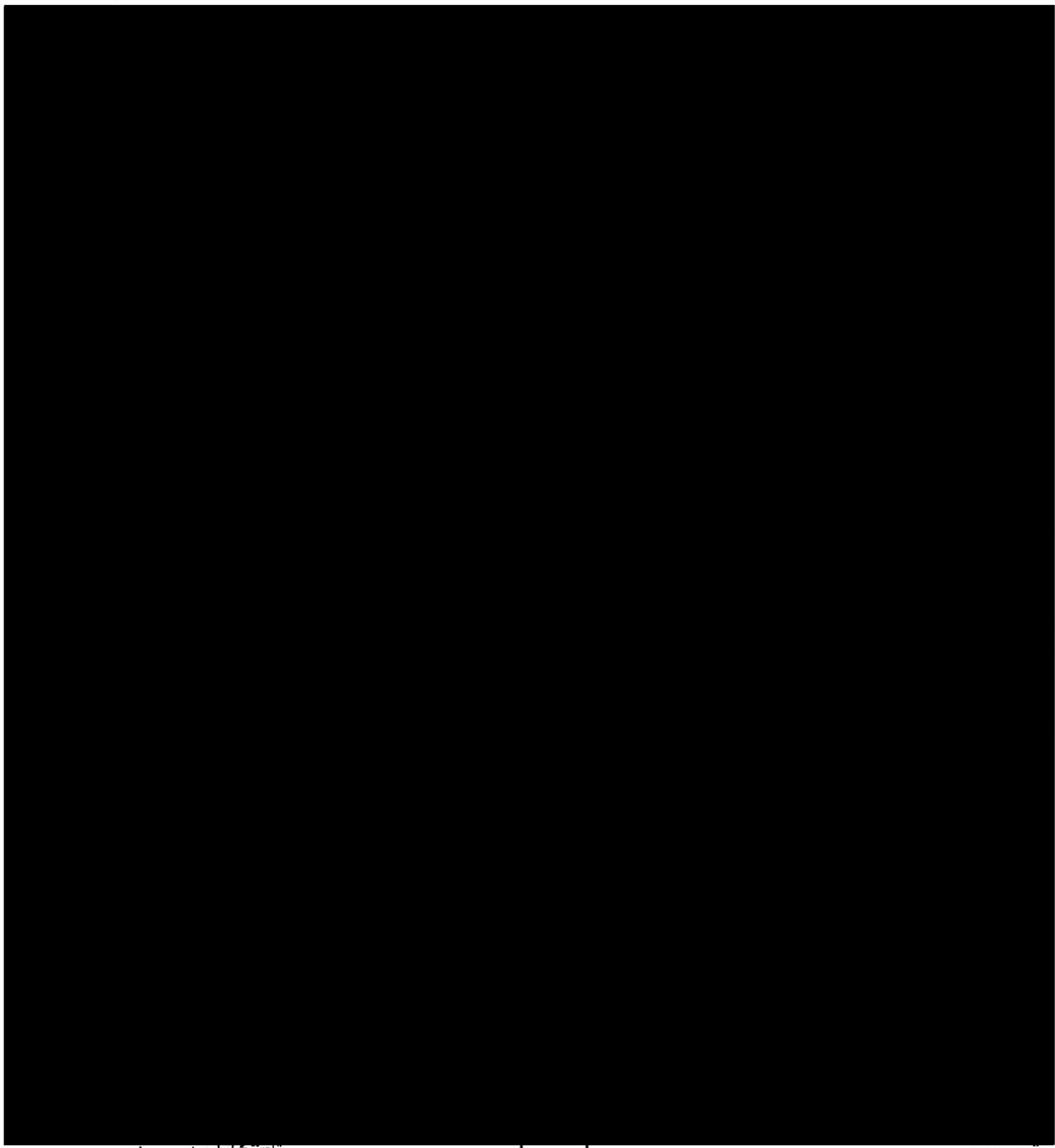
INPATIENT TEAM PROGRESS NOTES

©M-963 3/03

File Under: Progress Notes tab

76

76



WATERS & KRAUS, LLP  
DR C BEATY  
09/07/2003 DR W  
03250-00053 07/19/1988 PO

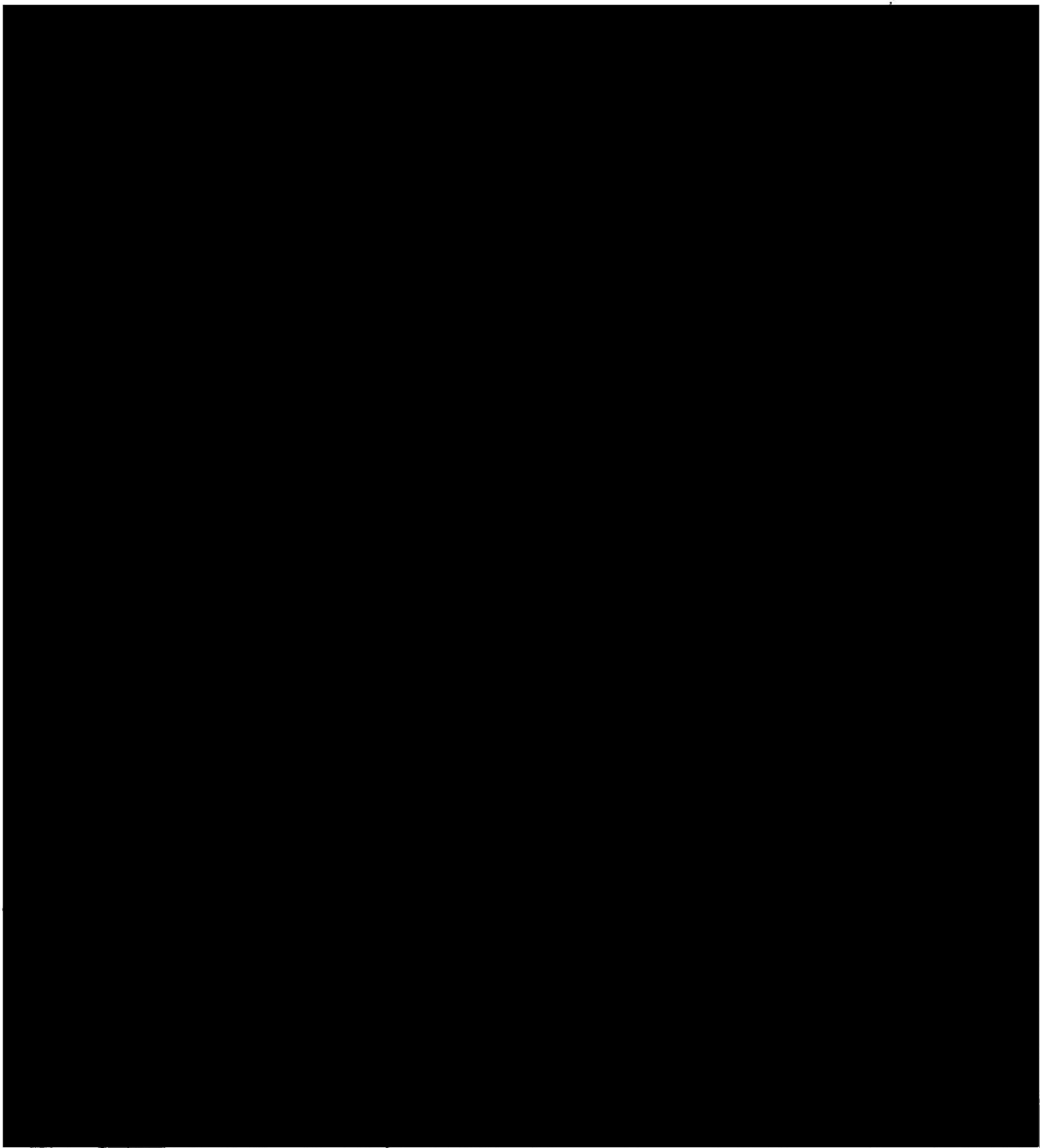


PROGRESS NOTES

M-01 (3/02)

77

77



TREGGETT, ROBERT S  
 DR C BEATY  
 09/07/2003 DR W S. JUP  
 095 03250-00350 07/19/1944PO



PROGRESS NOTES

M-91 (3/92)

78



Patient Name: TREGGETT, ROBERT

MR#: 745925

Date of Consultation: 09/08/2003

Unit/Rm: 5S 514 01

Consulting Physician: [REDACTED]

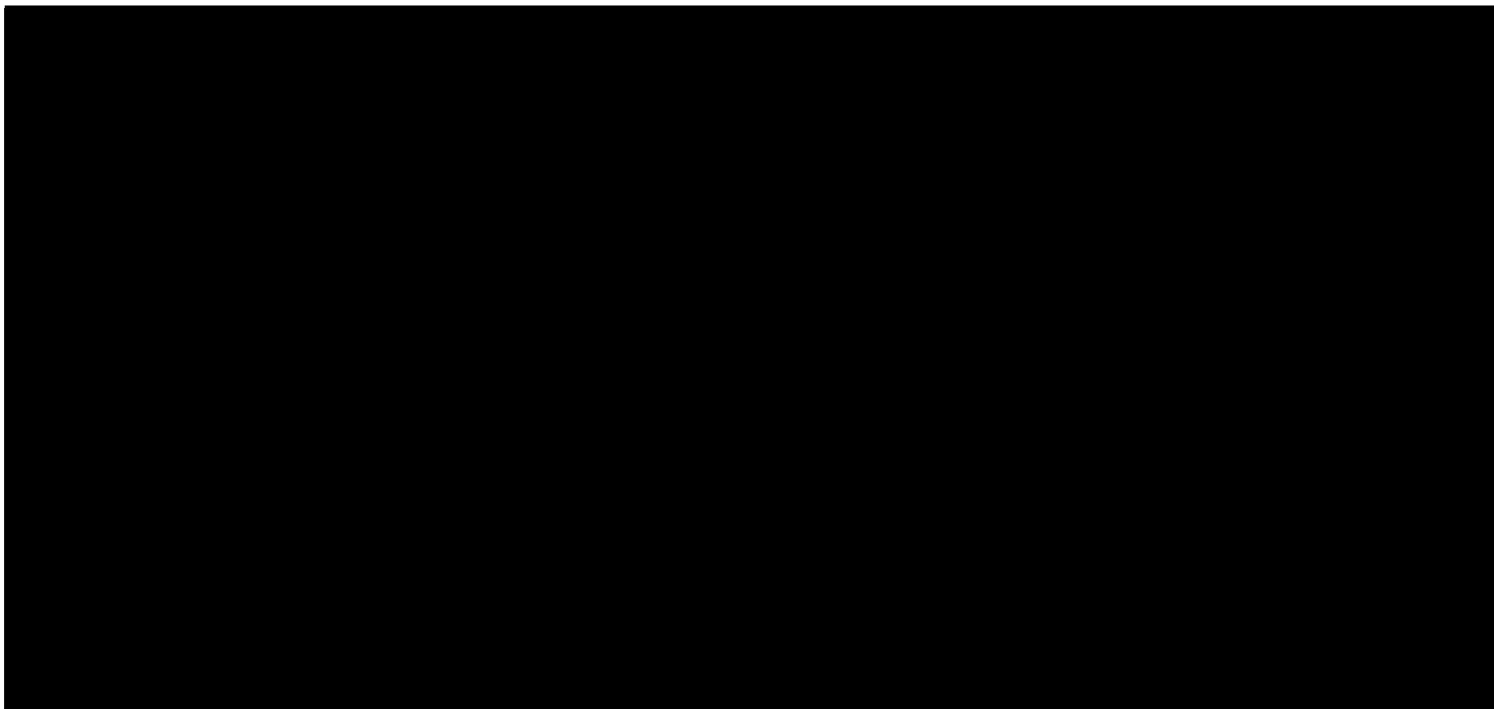
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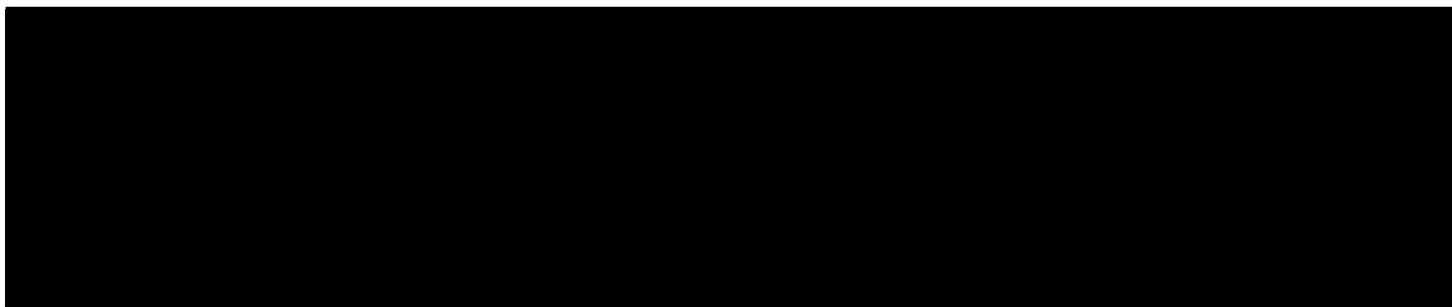
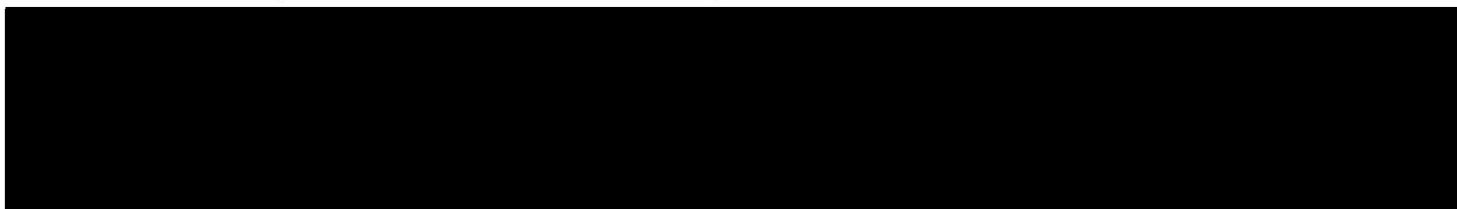
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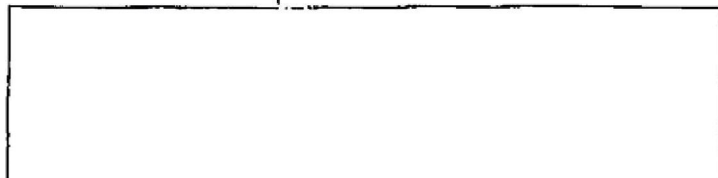
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**SOCIAL HISTORY:** The patient is a maintenance supervisor at Krista Ministries. He is also currently in school, studying as a senior ministry personnel. He is a nonsmoker. He is physically active at work. He is married. He has 1 daughter from a previous marriage and a wife with 1 daughter. The patient spent 9 years in the military at the naval shipyards in Newport, with extensive presumed asbestos exposure.



CONTINUED...



67

CONSULTATION

67

Patient Name: TREGOETT, ROBERT

MR#: 745925

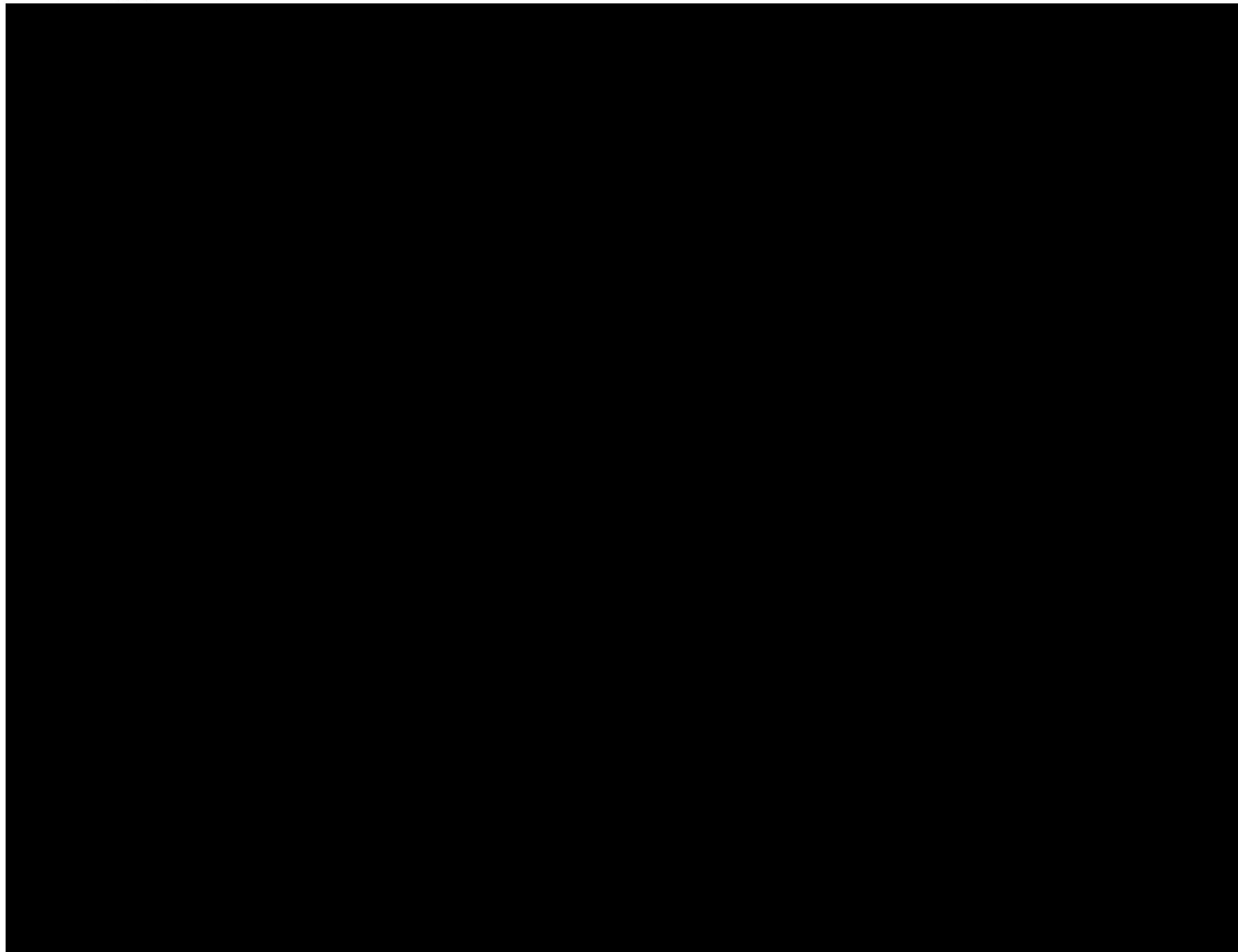
Date of Consultation: 09/08/2003

UnivRm: 5S 514 01

Consulting Physician: [REDACTED]

cc: [REDACTED]

PAGE 3



CONTINUED...

	[REDACTED] 68 CONSULTATION 68
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Patient Name: TREGGETT, ROBERT

MR#: 745975

Date of Consultation: 09/08/2003

Unit/Rm: 5S 514 01

Consulting Physician: [REDACTED]

cc: [REDACTED]

PAGE 4

[REDACTED]

Sincerely,

[REDACTED]

MLS: 95908

D: Mon Sep 08 21:35:51 2003 EST

T: Tue Sep 09 05:44:58 2003 EST

60583800

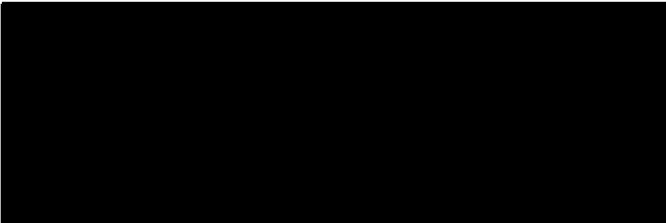
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CONSULTATION

69

69

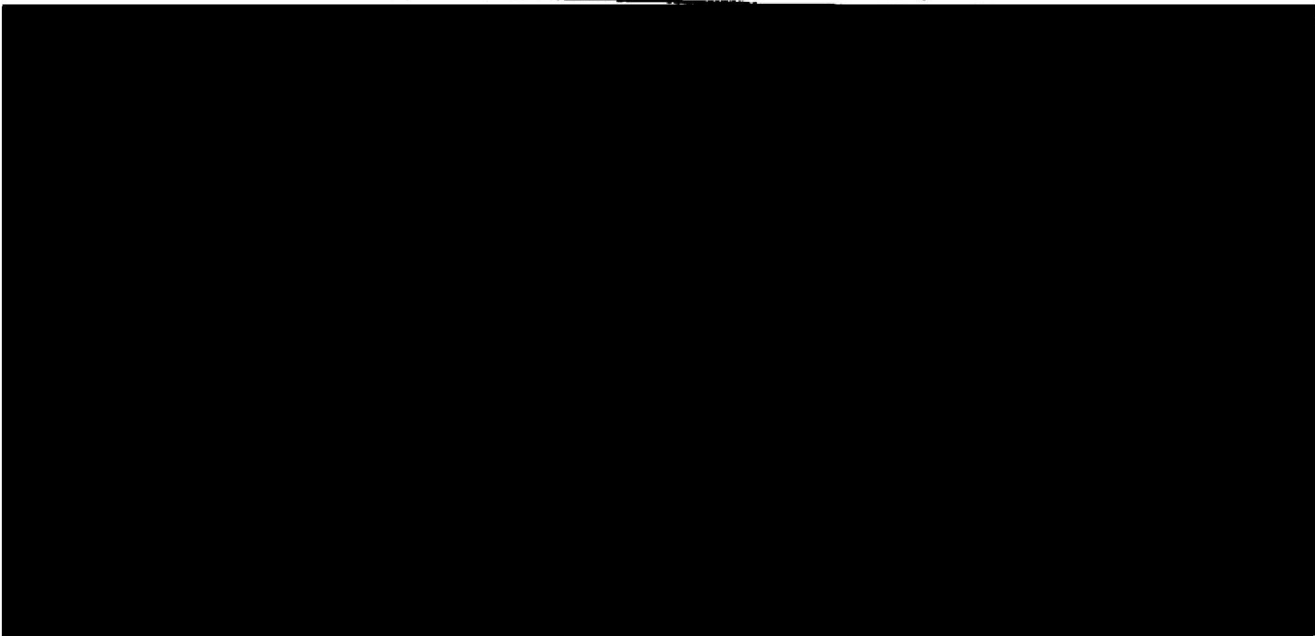


PATIENT DIAGNOSTIC REPORT

Verified

PATIENT NAME : TREGGETT, ROBERT S

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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SVC	PAT. TYPE	ADDENDUM #	ORDER #	cc: ██████████████████
DI	OBS	0	1612217	
ORDER DATE	COMPLETE DATE			
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84  
DICTATED BY: KINDER, ERIC A.  
TRANSCRIBED BY: DONNA DOWNING 09/08/2003 13:50  
VERIFIED BY: ██████████████████



PATIENT DIAGNOSTIC REPORT

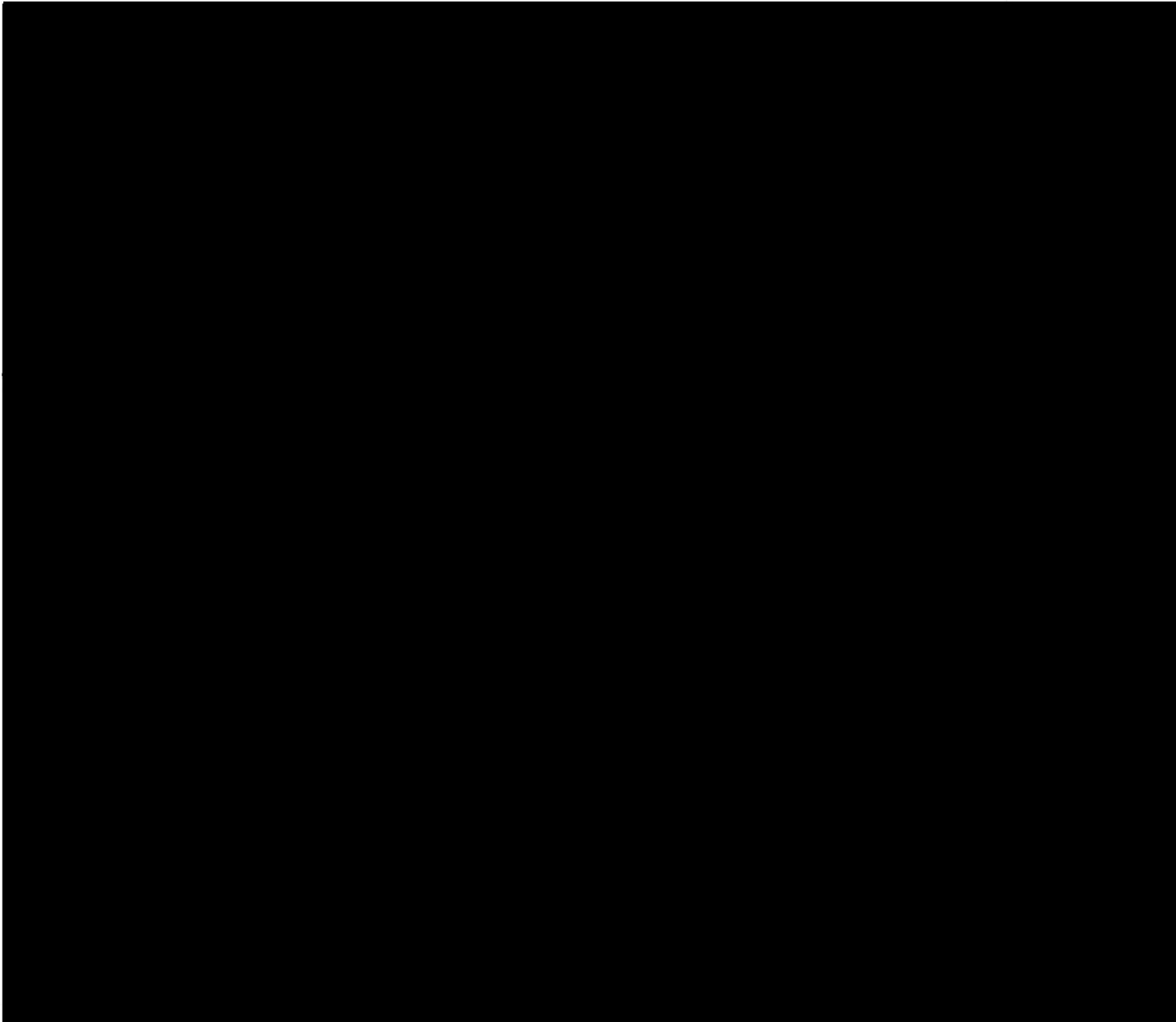
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PATIENT NAME: TREGGETT, ROBERT S

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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ORDER DATE	COMPLETE DATE
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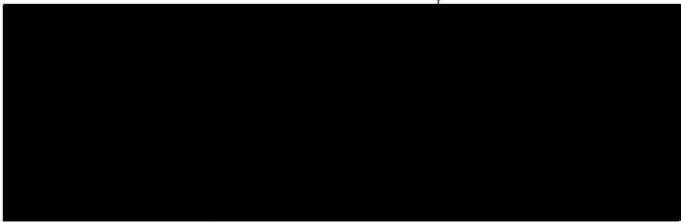


DAVID E. DONG, M.D.  
1560 N 115TH STREET #G16  
SEATTLE, WA 98133

2LBL

Dictated by: ALLEN, GREGORY J.  
Transcribed by: NOT APPLICABLE 09/09/2003 14:44  
Verified by: ████████████████████  
Verified on: 9/9/03 2:44:15PM

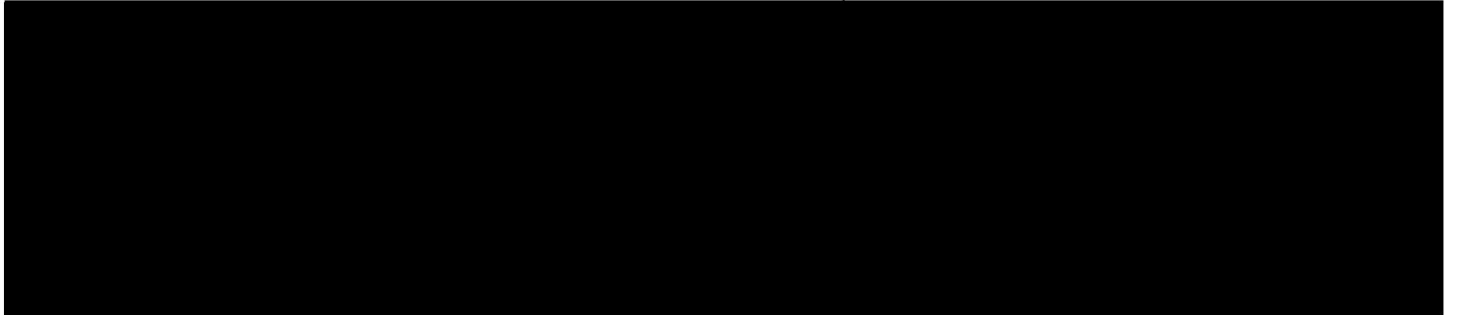




**PATIENT DIAGNOSTIC REPORT**

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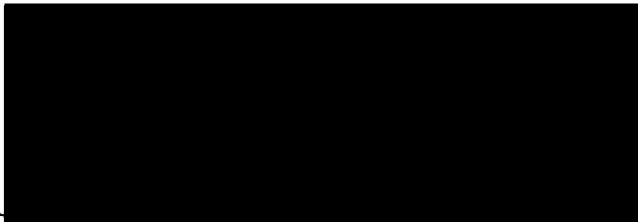
**PATIENT NAME : TREGGETT, ROBERT S**



**CT ABDOMEN SURVEY W/CONTRAST**

Page 2 of 2

70

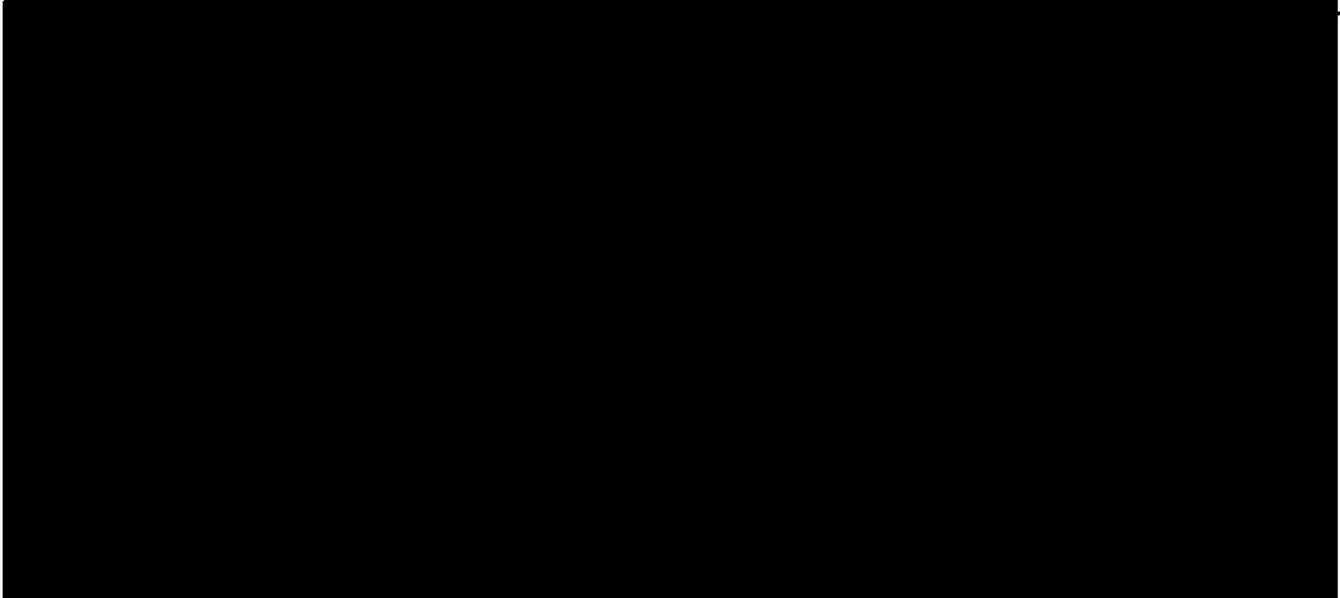


**PATIENT DIAGNOSTIC REPORT**

*Verified*

**PATIENT NAME : TREGGETT, ROBERT S**

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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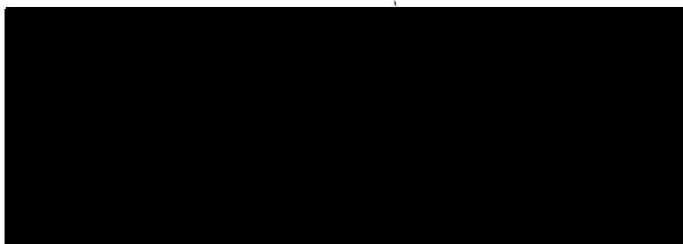


DAVID E. DONG, M.D.  
1580 N 115TH STREET #G16  
SEATTLE, WA 98133

2LBL

DICTATED BY: KINDER, ERIC A.  
TRANSCRIBED BY: ANN L. MANGUM 09/09/2003 17:38  
VERIFIED BY: ████████████████████  
VERIFIED ON: 9/10/03 11:34:06AM

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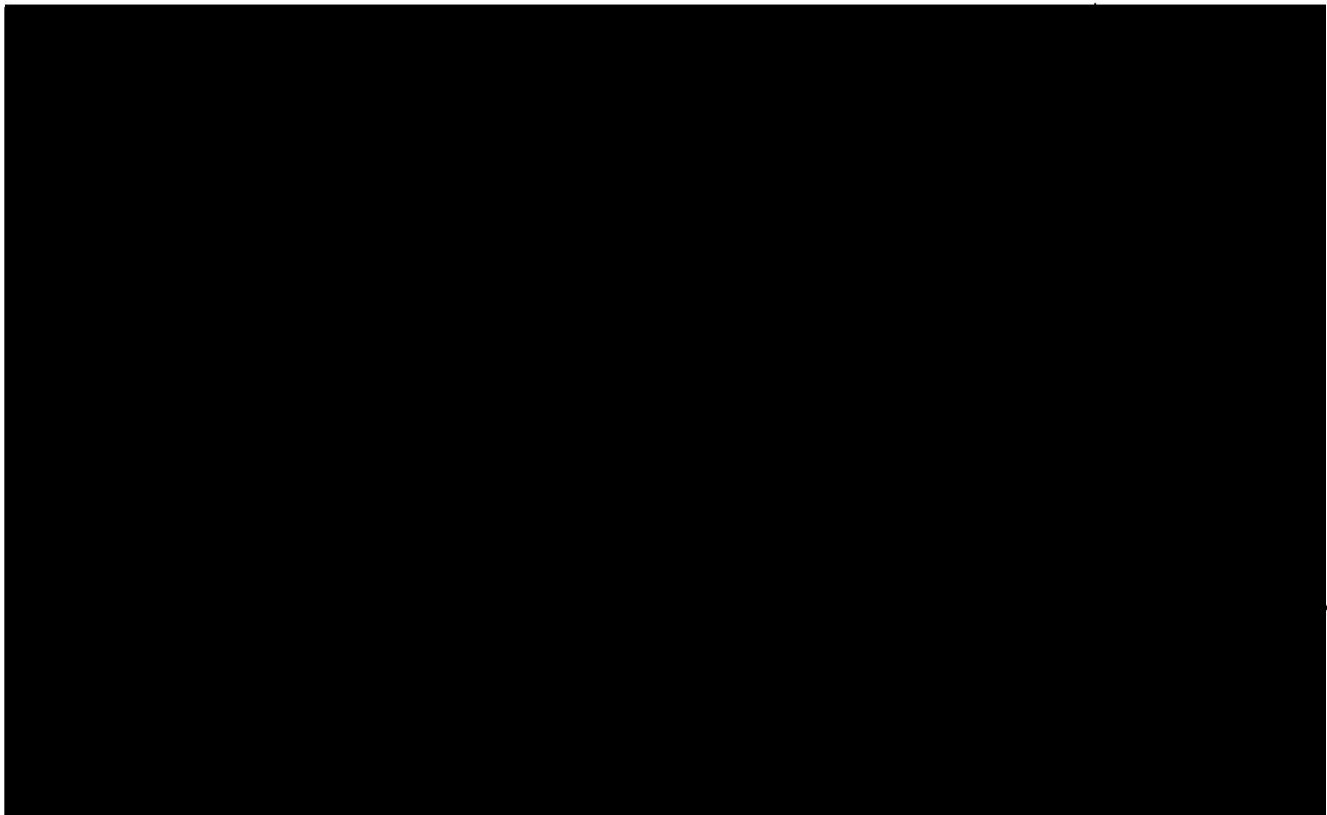


**PATIENT DIAGNOSTIC REPORT**

*Verified*

**PATIENT NAME : TREGGETT, ROBERT S**

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIAN/S:
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ORDER DATE		COMPLETE DATE		
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DAVID E. DONG, M.D.  
1560 N 115TH STREET #G16  
SEATTLE, WA 98139

2LBL

DICTATED BY: KINDER, ERIC A.  
TRANSCRIBED BY: ANN L. MANGUM 09/09/2003 14:06  
VERIFIED BY: ████████████████████

Patient Name: TREGGETT, ROBERT

MR#: 745925

IP

Date of Admission: 09/07/2003 10:42 AM EDT

Date of Discharge: 09/09/2003

Physician: [REDACTED]

cc: [REDACTED]

[REDACTED]

[REDACTED]

CONTINUED...

[REDACTED]  
DISCHARGE SUMMARY

1945



Patient Name: TREGGETT, ROBERT

MR#: 745925

Date of Admission: 09/07/2003 10:42 AM EDT

Date of Discharge: 09/09/2003

Physician: [REDACTED]

cc: [REDACTED]

PAGE 2

[REDACTED]

[REDACTED]

[REDACTED]

MLS: 95939

D: Tue Sep 09 22:18:39 2003 EST

T: Tue Sep 09 22:59:50 2003 EST

40549981

[REDACTED]  
DISCHARGE SUMMARY

57

PAT

Patient Name: TREGGETT, ROBERT

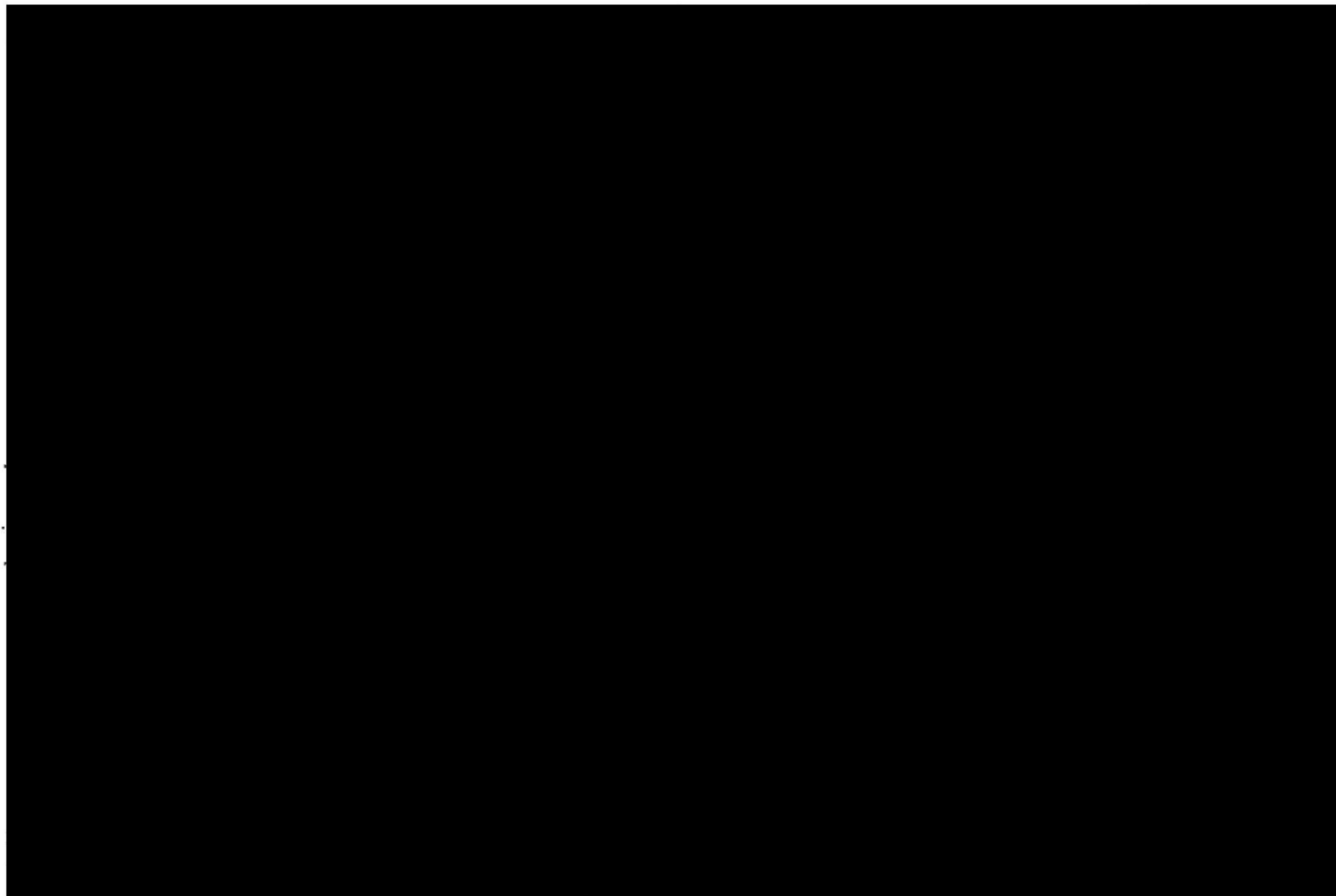
MR#: 0000745925

Date of Consultation: 09/12/2003

Unit/Rm:

Consulting Physician: [REDACTED]

cc: [REDACTED]



SOCIAL HISTORY: The patient is a maintenance worker at Crystal Ministries. He is studying with senior ministry personnel. He is a lifelong nonsmoker and physically active. Of note, the patient spent seven years in the military in the naval shipyards in Newport with some exposure to asbestos, presumed in the nuclear branch as a nuclear operator for nuclear parts.

CONTINUED...

TREGGETT, ROBERT S M-59  
DR R KARMYJONE:0000745925  
09/16/2003 DR  
PAT 01255-00559 07/19/1984PO  
SUR



CONSULTATION

1010

Patient Name: TREGGETT, ROBERT

MR#: 0000745925

Date of Consultation: 09/12/2003

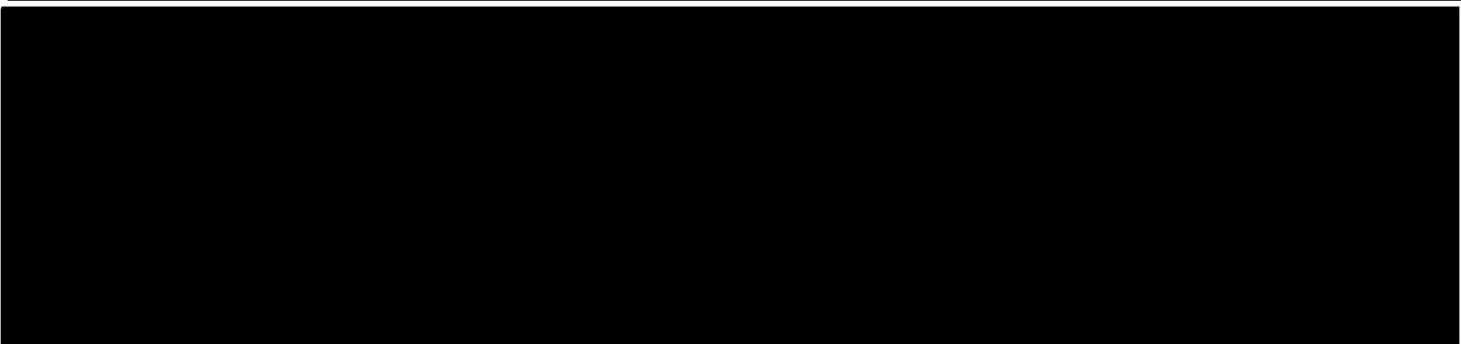
Unit/Rm:

Consulting Physician:

cc:

PAGE 2

FAMILY HISTORY: He has one brother and one sister. Brother has had asthma \_\_\_\_\_ Mother living in her 80s, and father died of heart failure. No history of malignancies in the family.



Riyadh Karmy-Jones, MD

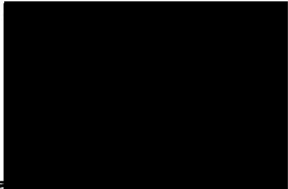
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TREGGETT, ROBERT S M-59  
DR R KARMYJONES 0000745925  
09/16/2003 DR  
DAT 03255-00550 07/10/101100



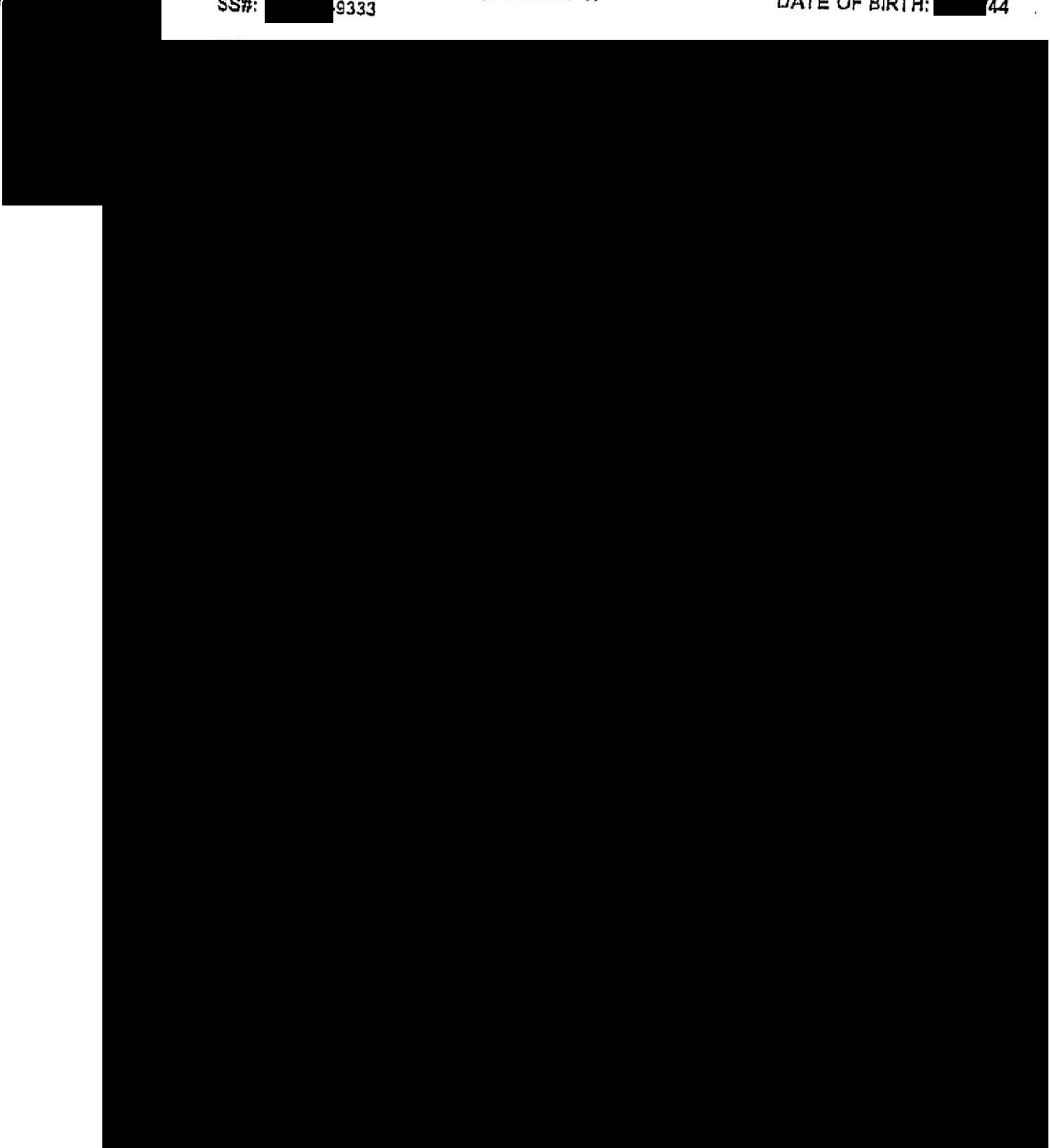
CONSULTATION

101



REFERRING PHYSICIAN: [REDACTED]  
PATIENT NAME: TRFGGETT, ROBERT S.  
SS#: [REDACTED] 9333

DATE OF EXAM: 09/12/03  
DATE OF BIRTH: [REDACTED] 44



~~RECEIVED~~



Patient Name: TREGGETT, ROBERT

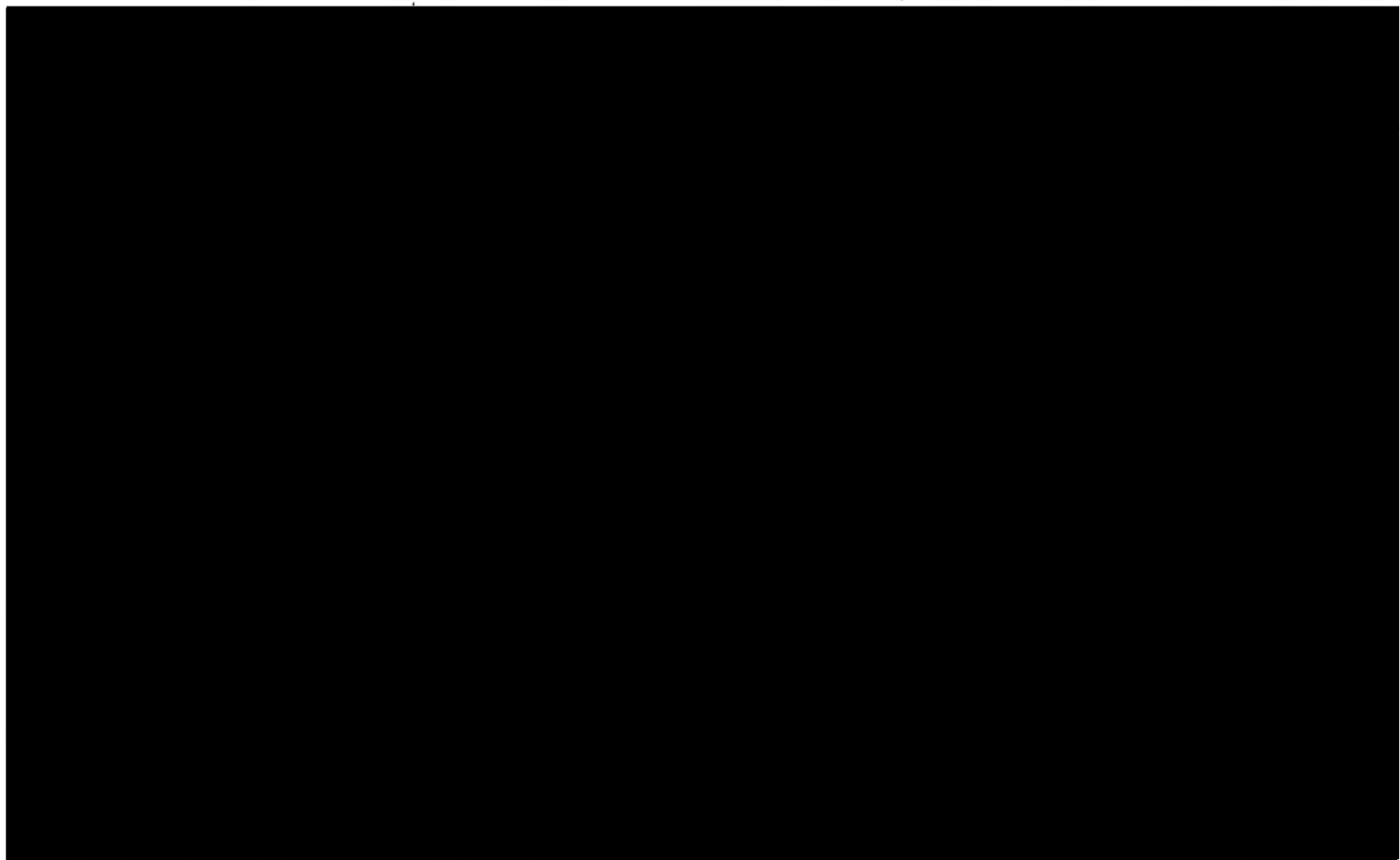
MR#: 0000745925

Date of Surgery: 09/16/2003

Unit/Rm: 4W 433 01

Surgeon: [REDACTED]

cc: [REDACTED]



MLS: 96170

D: Tue Sep 16 12:37:17 2003 EST

T: Wed Sep 17 10:00:44 2003 EST  
40557524

TREGGETT, ROBERT S  
DR R KARMYJONE:0000745925  
09/16/2003 DR  
PAT 03235-00559 07/19/1944PO  
SUR

[REDACTED]  
OPERATIVE/PROCEDURE REPORT 104  
104

# PATHOLOGY REQUISITION (A)

RICHARD G. PATTON, M.D. • IR • HECTOR C. ALDAPE, M.D.  
CHARLES R. SIMRELL, M.D. • ELIZABETH K. SCHMIDT, M.D.

PROCEDURE DATE	9/16/03
REQUISITION LOCATION	
<input checked="" type="checkbox"/> OR	<input type="checkbox"/> ER
<input type="checkbox"/> ENDO	<input type="checkbox"/> OTHER (note below)
FORM COMPLETED BY	
A. Emerson RN	
SPECIAL INSTRUCTIONS	

NAME: TREGGETT, ROBERT S

MEDICAL RECORD # DR R KARMYJONE: 0000745925 H-59

SEX: M/F 09/16/2003 DR

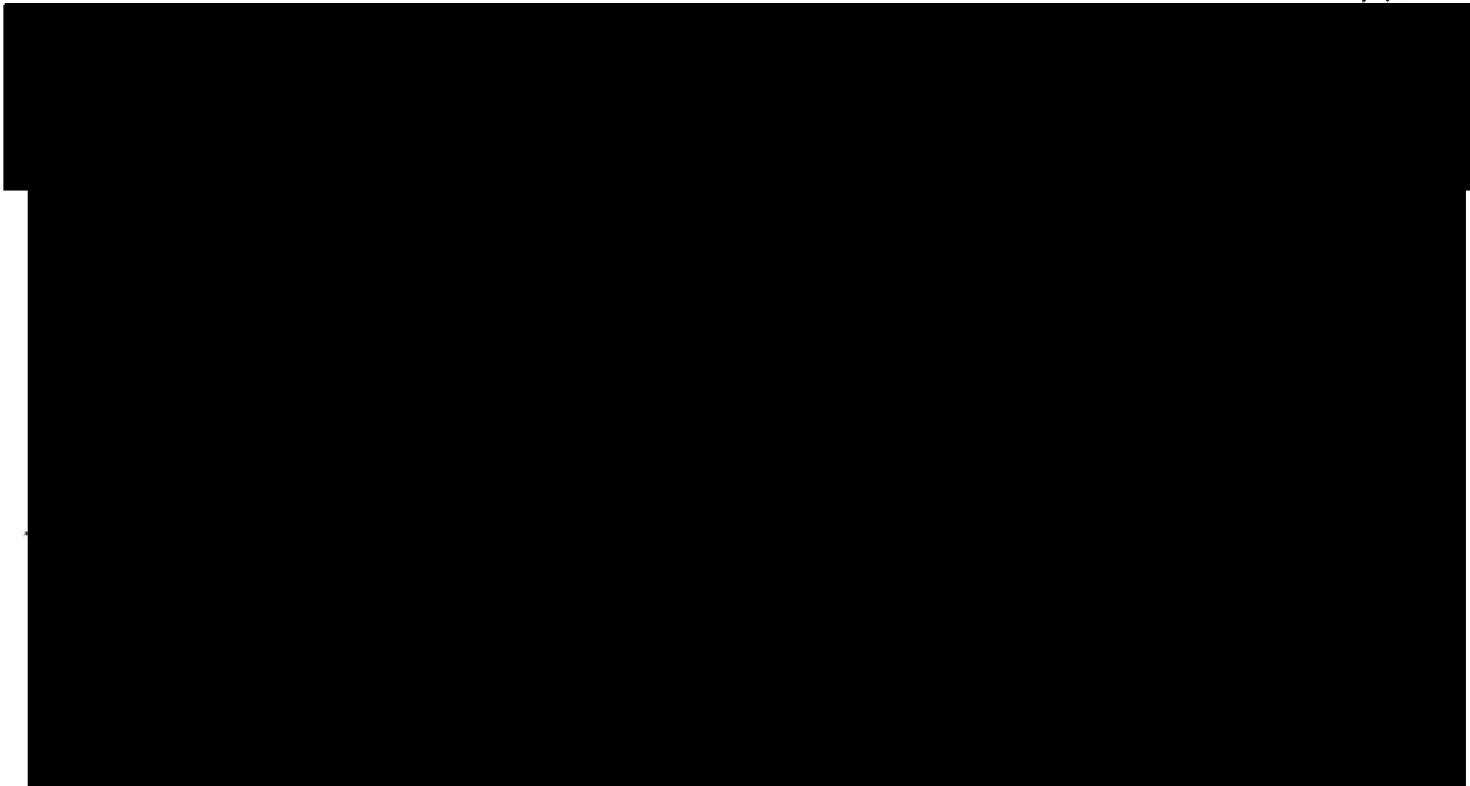
BIRTHDATE: PAT 03255-00559 07/19/1944PO

FINANCIAL: SUR

SEND REPORTS TO: (List Names of Surgeons, Attending, Consultants)

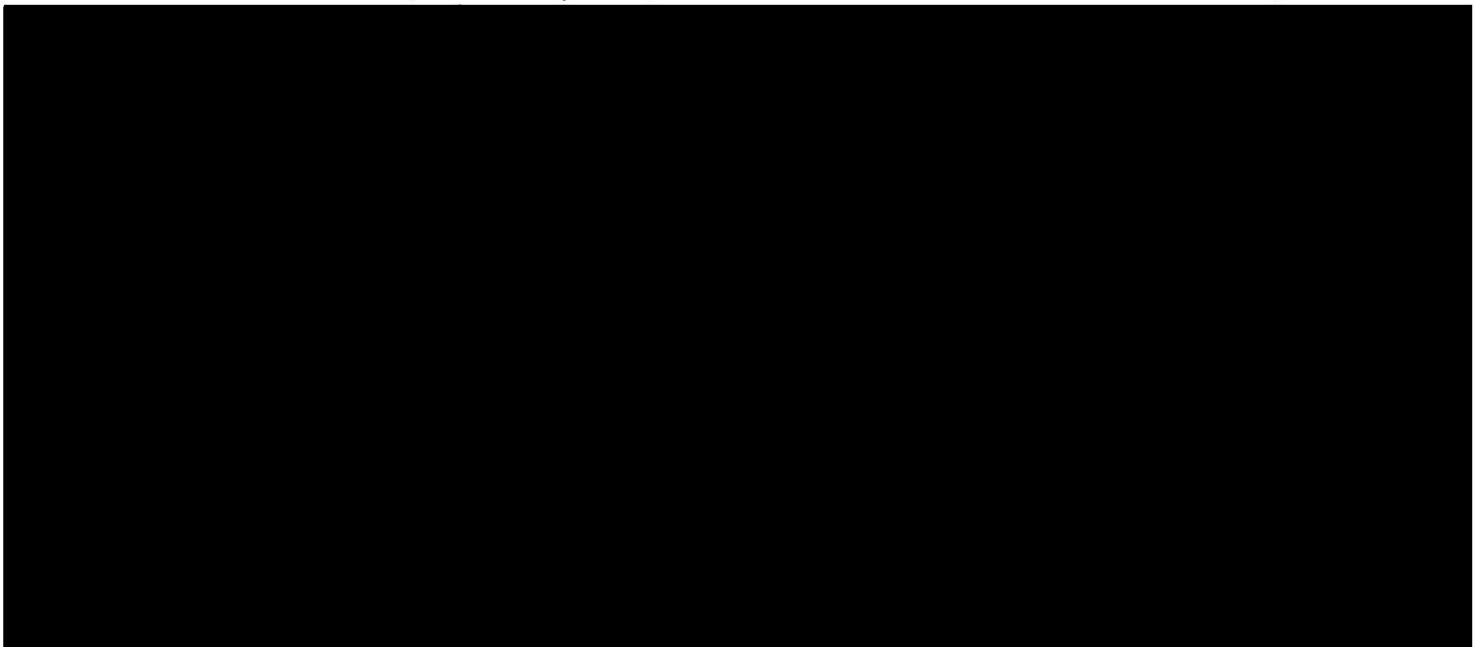
FINAL Surgical Pathology Report for TREGGETT, ROBERT S (S2003-007389)

9-18



*Charles R Simrell*

CHARLES R SIMRELL MD, Pathologist  
(Signed 09 23 2003)



TREGGETT, ROBERT S  
LOC: Surgery Departm  
M [redacted] 1944 Age: 59

MR#: 0000745925  
ADM#: 0325500559

PATHOLOGY REPORT

SPECIMEN OBTAINED: 09 16 2003  
SPECIMEN ACCESSIONED: 09 16 2003  
DATE REPORTED: [redacted]

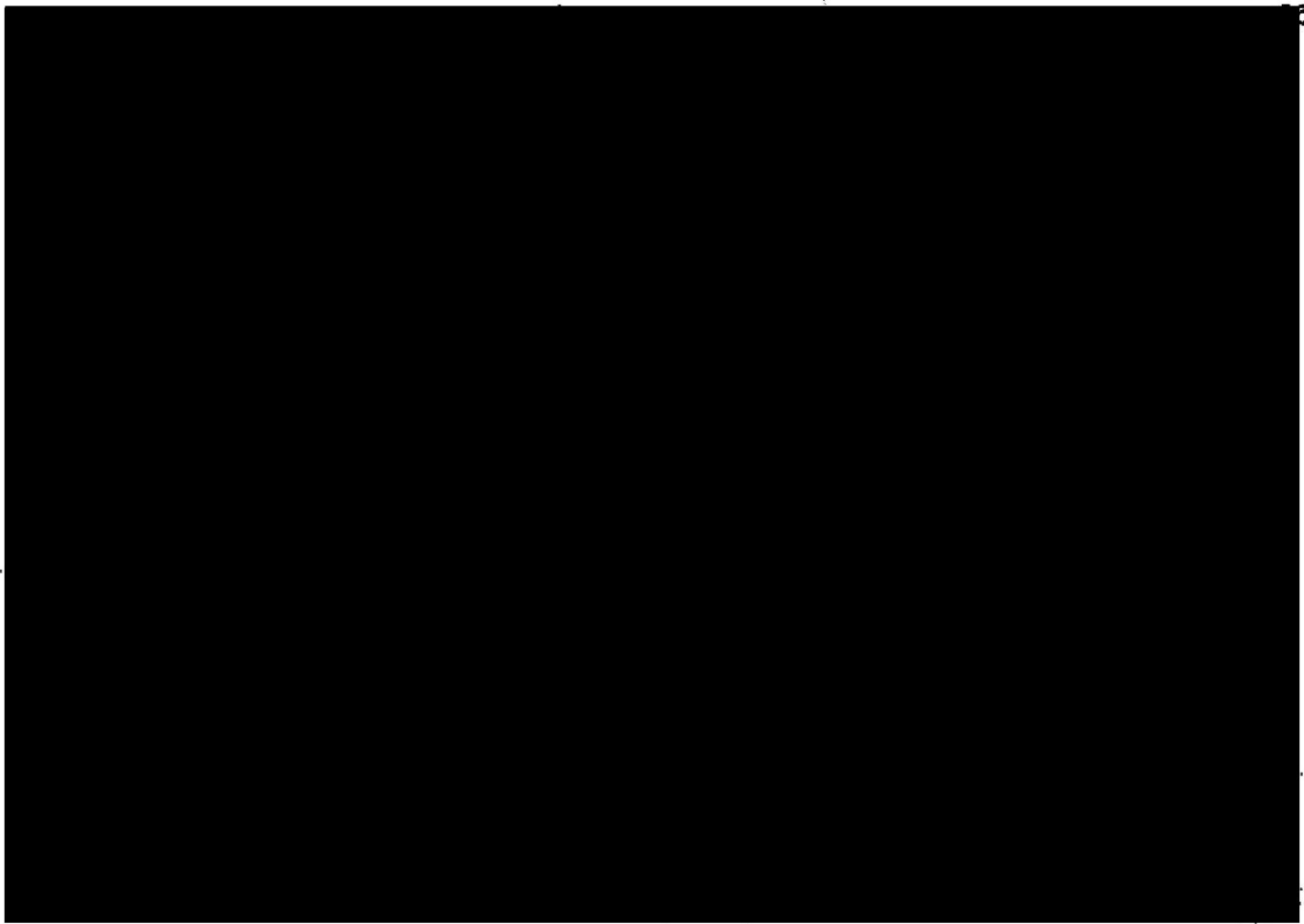


CASE #: S2003-007389 :105

DISCH. DATE: None

PERFORMED AT [redacted]

PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA. 98133-8498 - (206)368-1779 - C.A.P. ACCREDITED #466



Northwest Pathology Services

RICHARD G. PATTON, MD - CHARLES R. SIMRELL, MD - ELIZABETH K. SCHMIDT, MD - ENMA SAIZ, MD - PAUL F. EDMONSON, MD

TREGGETT, ROBERT S

MR#: 0000745925

PATHOLOGY REPORT

LOC: Surgery Departm

ADM#: 0325500559

M [REDACTED] 1944 Age: 59

SPECIMEN OBTAINED: 09 16 2003

SPECIMEN ACCESSIONED: 09 16 2003

DATE REPORTED: [REDACTED]

CASE #: S2003-007389

101

DISCH. DATE: None

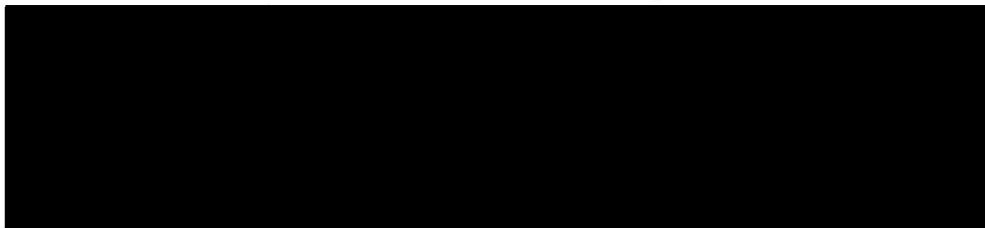
PERFORMED AT [REDACTED] PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA 98133-8498 - (206) 368-1779 - C.A.P. ACCRED #2466

106

2 of 2 on 09-23-2003 at 16:58:25

Duplicate copy





Patient Name: TREGGETT, ROBERT

\* Preliminary \*

AGE: 59

DOB: [redacted] 1944

Date Received: [redacted]

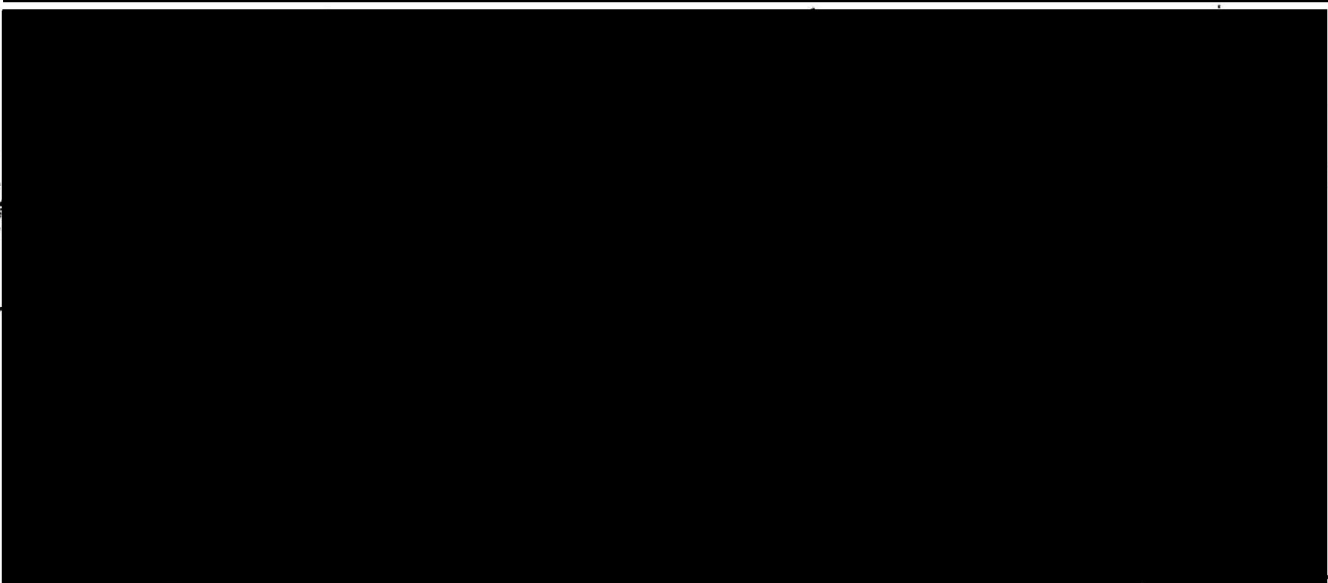
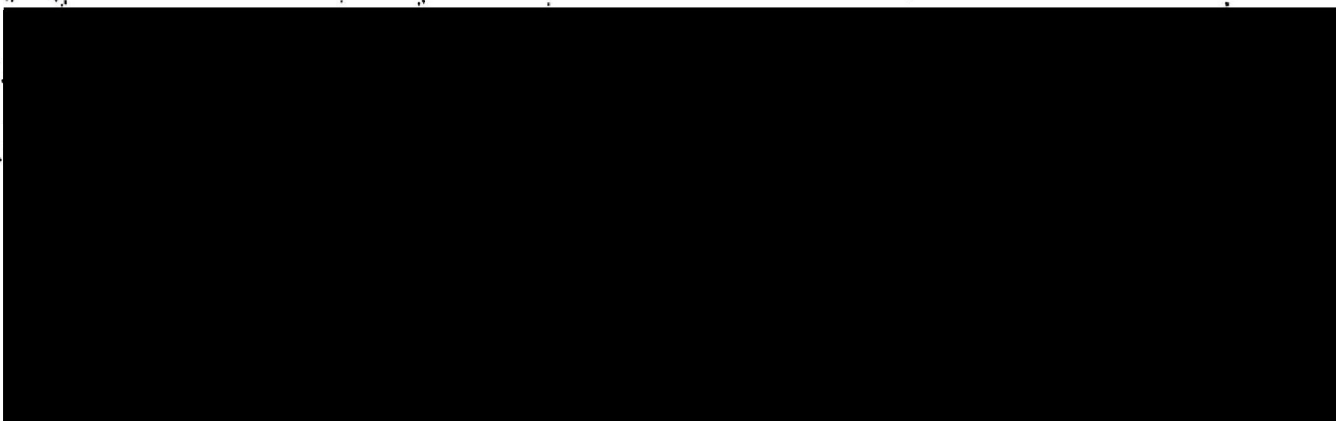
Date Signed Out: [redacted]

Requested By: [redacted]

Other Case Numbers:

S03-7149

S03-7389



Page 1 of 1

*Handwritten signature or initials*

ACCESSION NO. D03-641

Samuel P. Hammar, M.D., F.C.C.P., F.C.A.P., Director

Keith O. Hallman, M.D.

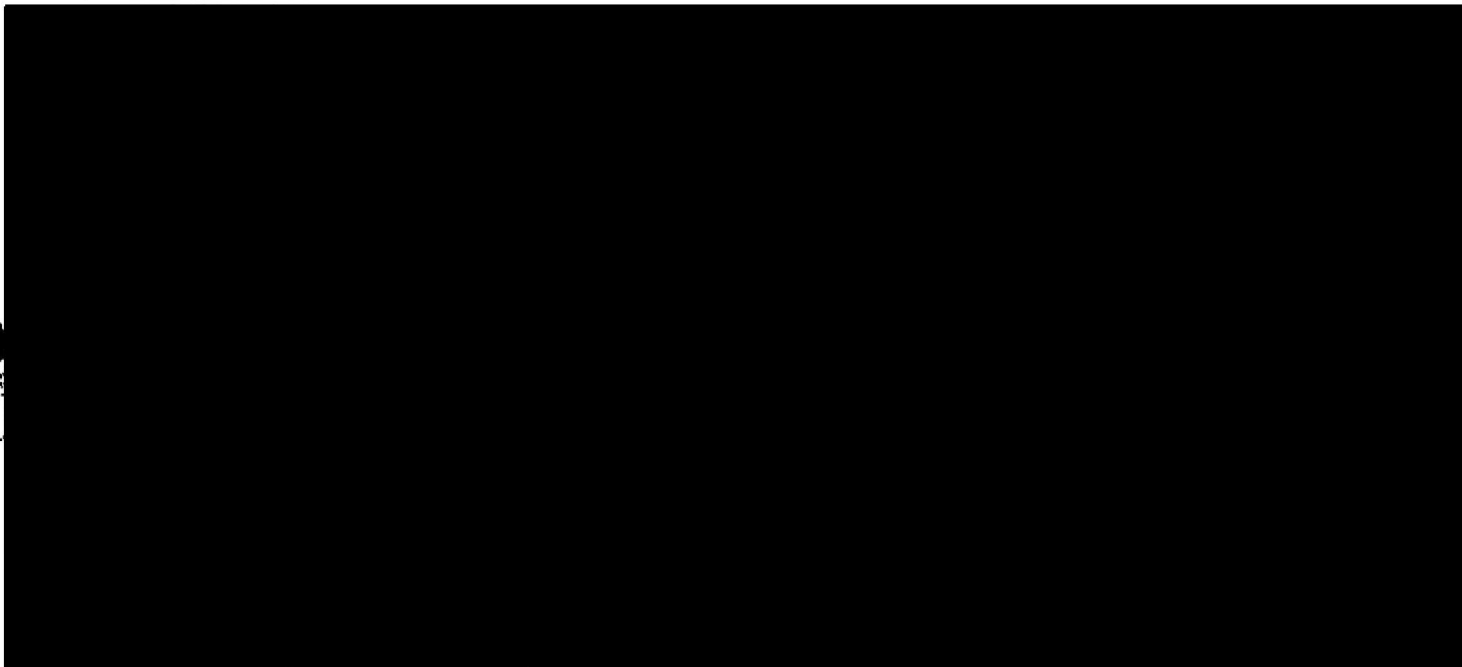
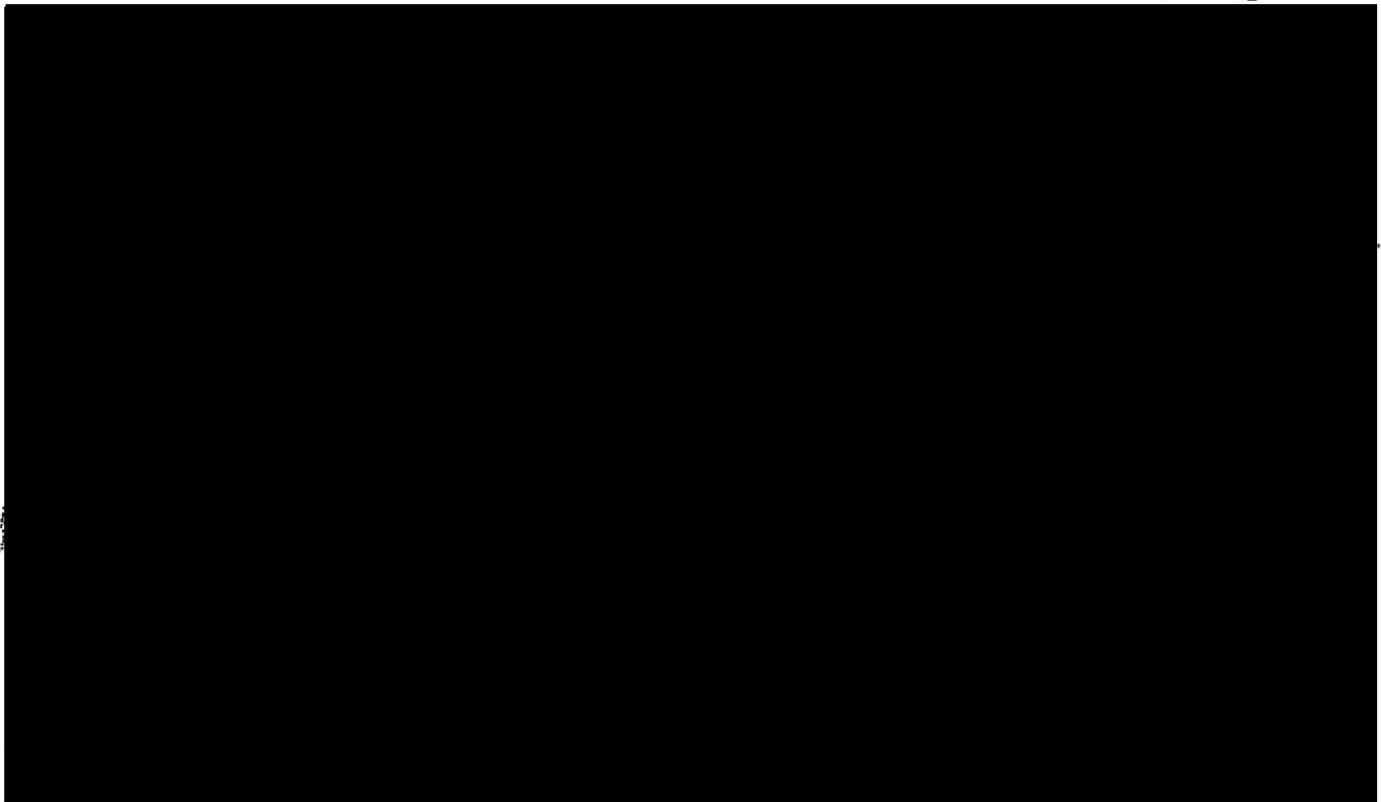
David M. Bray, M.D.

Richard A. Gray, M.D.

Patient Name: TRUQUETT, ROBERT  
DOB: [REDACTED] 4 (Age: 59)

Med. Rec. #:

Path No: D03-641  
Taken: 5/25/2003



Page 2 of 2

ACCESSION NO. D03-641

Samuel P. Hammar, M.D., F.C.C.P., F.C.A.P., Director

Keith O. Hallman, M.D.

David M. Bray, M.D.

Richard A. Cox, M.D.

Sent by: WATERS & KRAUS, LLP

2149480226;

05/06/04 11:37AM; JetFax #559; Page 74/116

Received: 4/29/04 8:28

7133650808 -> WATERS & KRAUS, LLP; Page 5

04/29/2004 07:13 7133650808

CCI

PAGE 05/05<sup>69</sup>

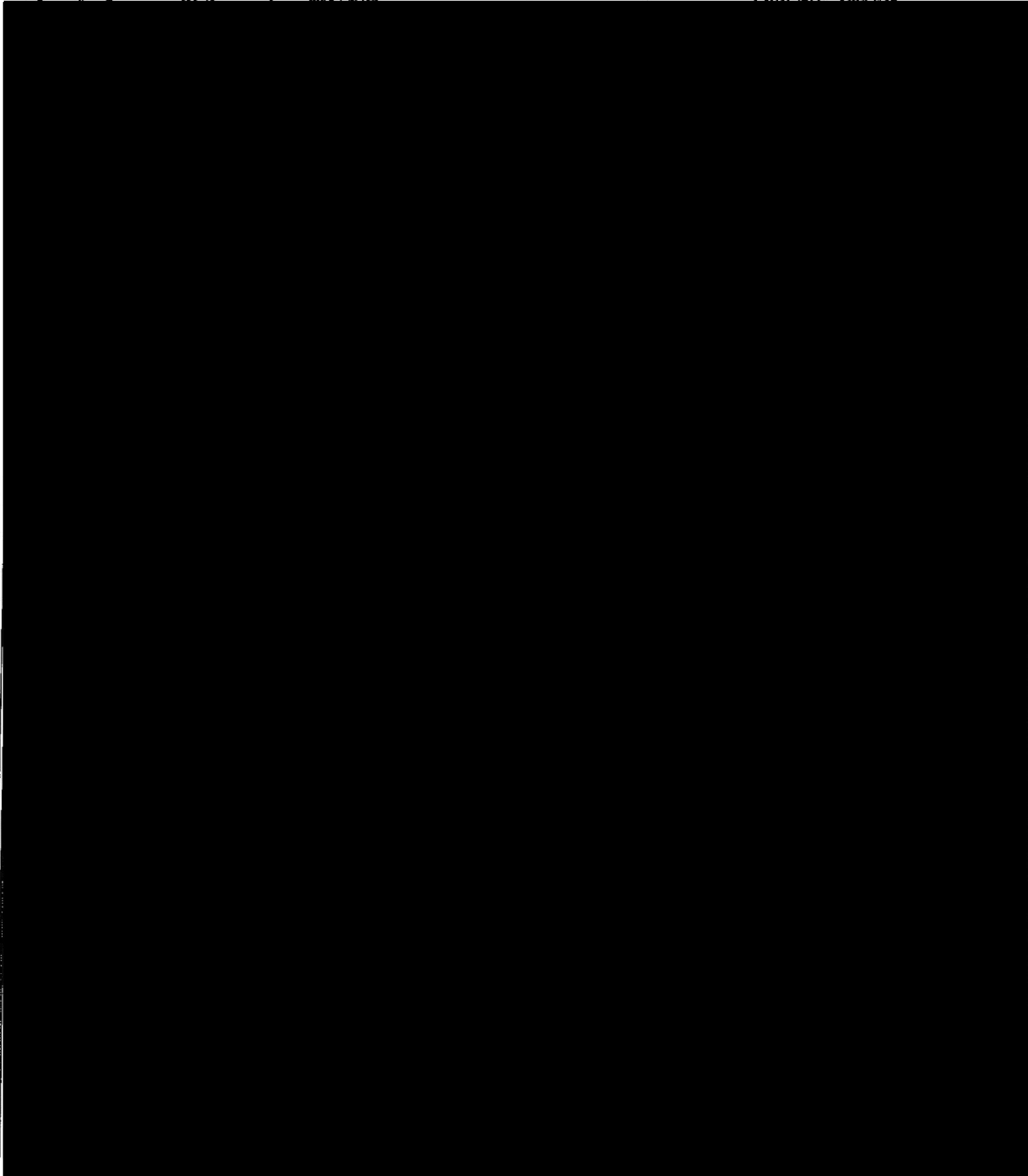
APR 28 2004 12:38PM HP LASERJET 3200

P.5

Patient Name: TREGGETT, ROBERT

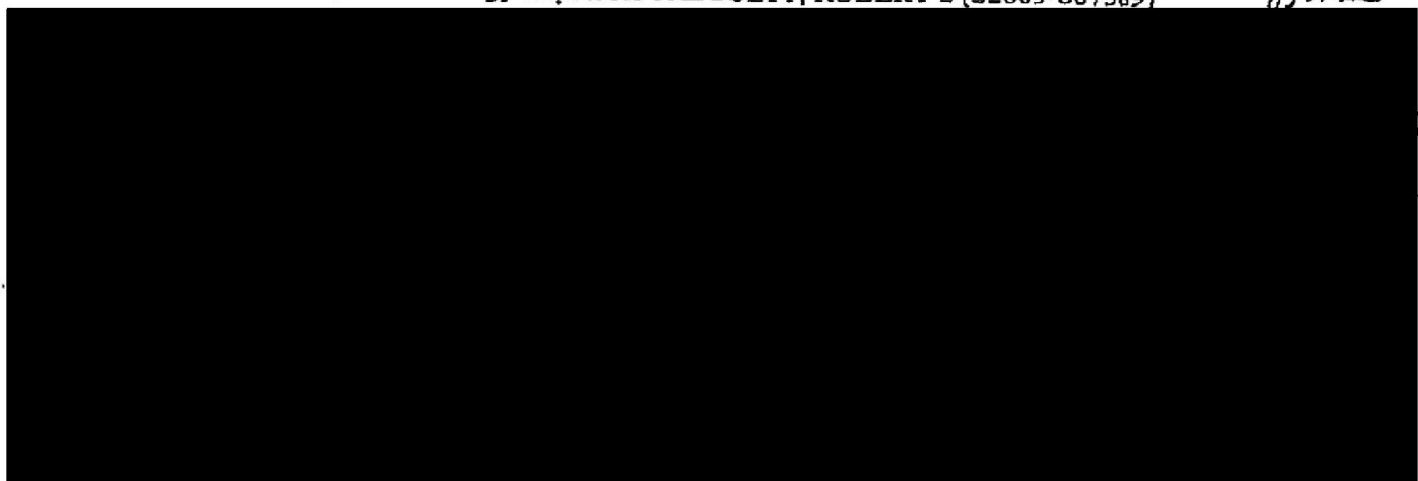
DOB: 7/6/30/41

Path No: 000-000



SUPPLEMENTAL Surgical Pathology Report for TREGGETT, ROBERT S (S2003-007389)

70  
-4/m/j/ovle



*Charles R Simrell MD*

CHARLES R SIMRELL MD, Pathologist  
(Signed 09 23 2003)



\*\*\*\*\*ADDENDUM\*\*\*\*\*

Addendum  
A. PARTS A AND B.

Northwest Pathology Services

RICHARD G. PATTON, MD - CHARLES R. SIMRELL, MD - ELIZABETH K. SCHMIDT, MD - ENMA SAIZ, MD - PAUL F. EDMONSON, MD

TREGGETT, ROBERT S

LOC: Surgery Departm

M [redacted] 1944 Age: 59

MR #: 0000745925

ADN#: 0325500559

PATHOLOGY REPORT

SPECIMEN OBTAINED: 09 16 2003

SPECIMEN ACCESSIONED: 09 16 2003

DATE REPORTED: [redacted]

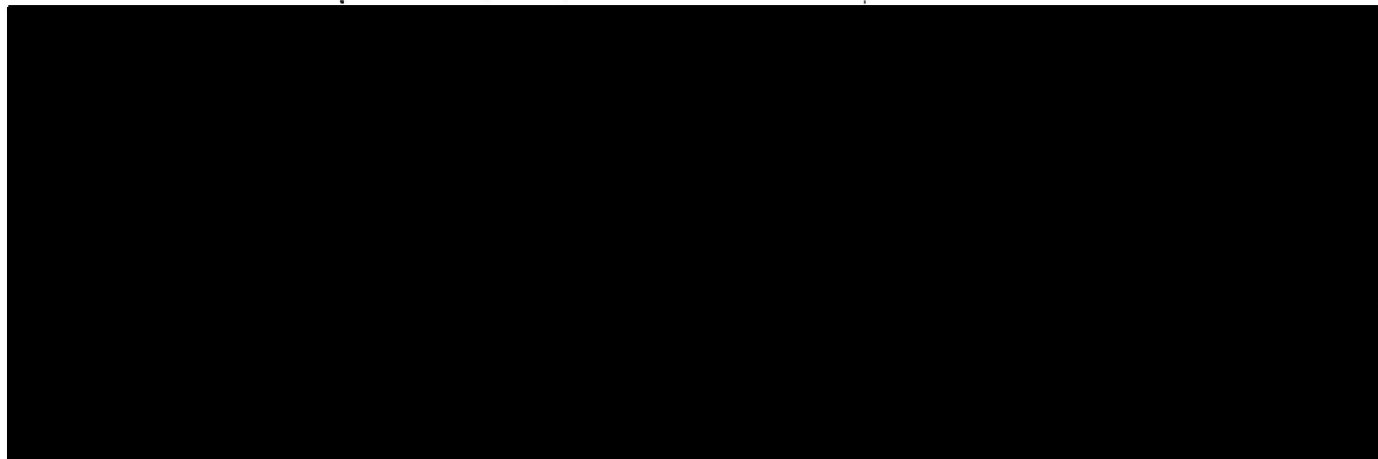
CASE #: S2003-007389 107

DISCH. DATE: None

PERFORMED AT [redacted]

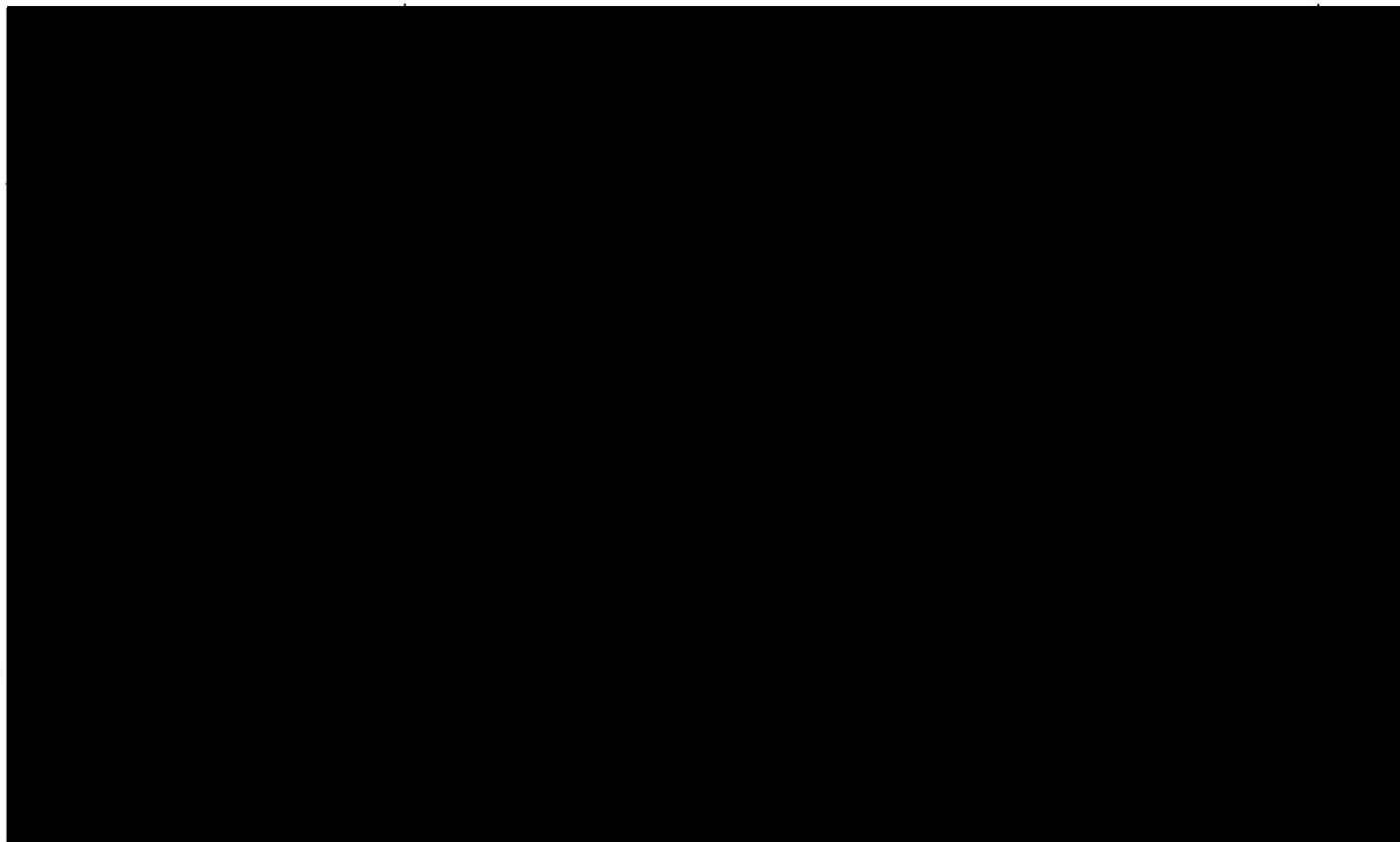
PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA, 98133-8498 - (206)368-1779 - C.A.P. ACCRED.#24665





*Charles R. Simrell MD*

Signed on 10 01 2003 by CHARLES R SIMRELL MD, Pathologist



Northwest Pathology Services

RICHARD G. PATTON, MD - CHARLES R. SIMRELL, MD - ELIZABETH K. SCHMIDT, MD - ENMA SAIZ, MD - PAUL F. EDMONSON, MD

**TREGGETT, ROBERT S**

LOC: Surgery Departm

M [REDACTED] 1944 Age: 59

MR#: 0000745925

ADM#: 0325500559

**PATHOLOGY REPORT**

SPECIMEN OBTAINED: 09 16 2003  
SPECIMEN ACCESSIONED: 09 16 2003  
DATE REPORTED: [REDACTED]



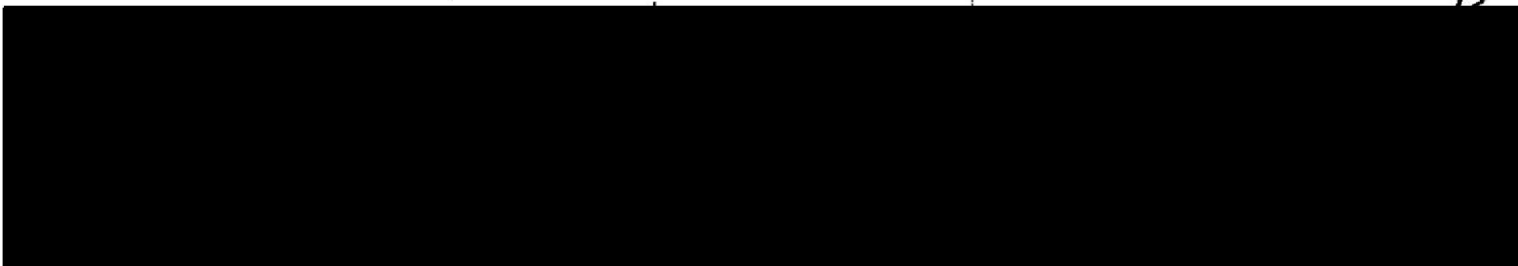
CASE #: S2003-007389 108

DISCH. DATE: None

PERFORMED AT [REDACTED] PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA. 98133-8498 - (206)368-1779 - C.A.F. ALCKER #246554

2 of 3 on 10-02-2003 at 09:18:58

Duplicate copy



Northwest Pathology Services

RICHARD G. PATTON, MD - CHARLES R. SIMRELL, MD - ELIZABETH K. SCHMIDT, MD - ENMA SAIZ, MD - PAUL F. EDMONSON, MD

**TREGGETT, ROBERT S**

MR#: 0000745925

**PATHOLOGY REPORT**

LOC: Surgery Departm

ADM#: 0325500559

M [REDACTED] 1944 Age: 59

SPECIMEN OBTAINED: 09 16 2003

SPECIMEN ACCESSIONED: 09 16 2003

DATE REPORTED: [REDACTED]

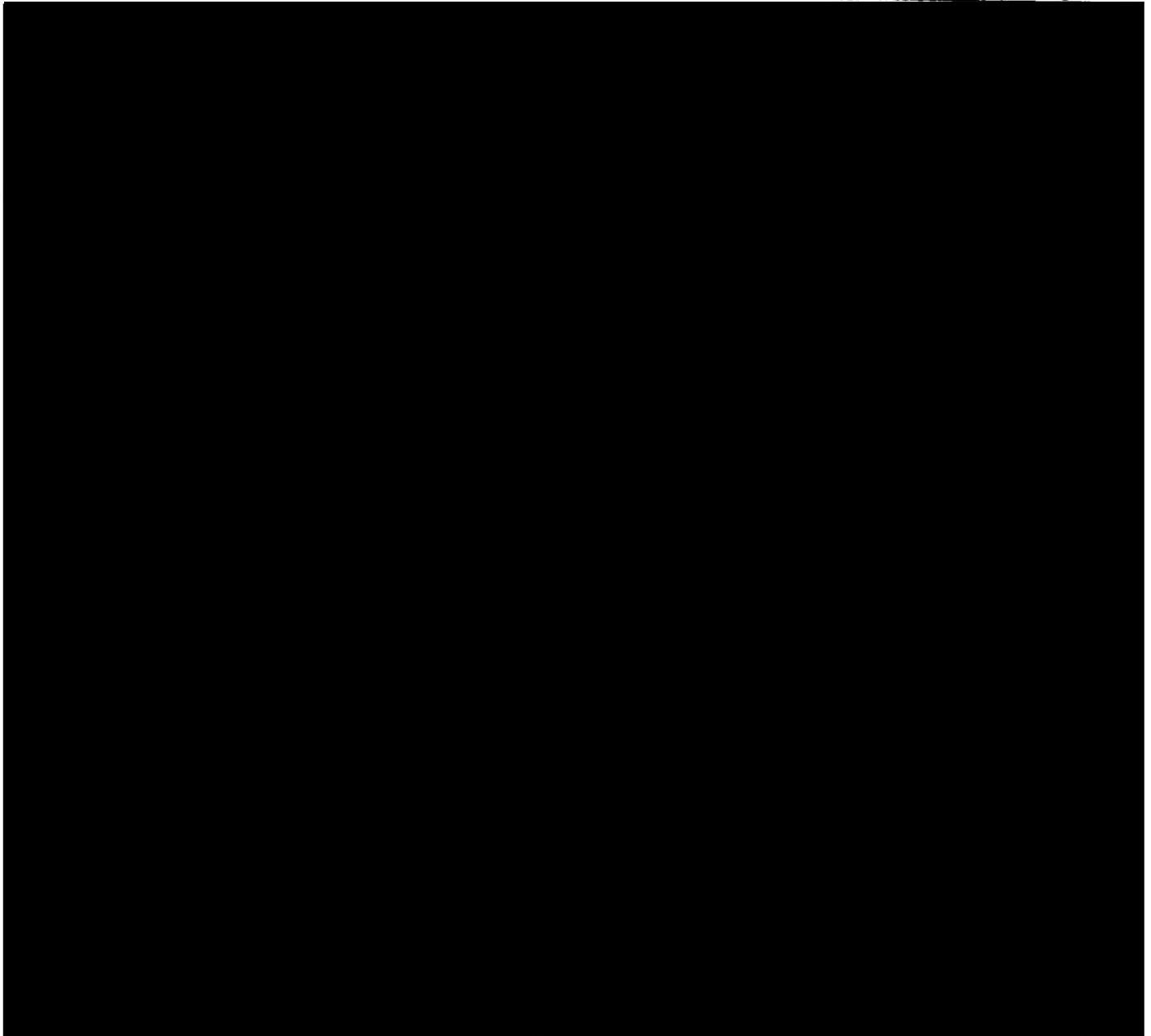


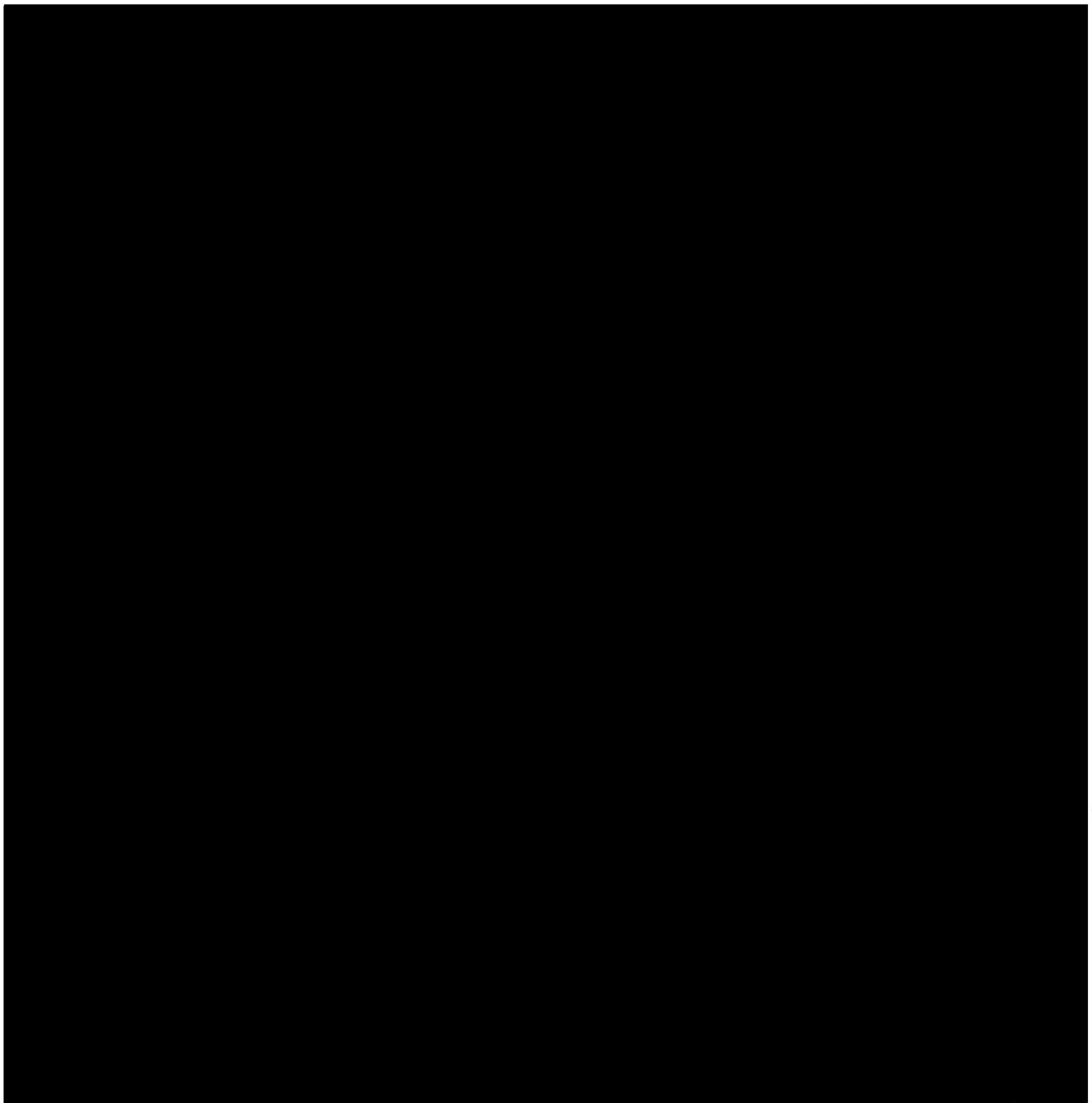
CASE #: S2003-007389 (0)

DISCH. DATE: None

PERFORMED AT [REDACTED] PATHOLOGY DEPT - 1550 N 115th St - SEATTLE, WA. 98133-8498 - (206)368-1779 - C.A.P. ACCRED.#2466

PLEURAL MESOTHELIOMA	
<p>Hospital Name/Address</p> <div style="background-color: black; width: 100%; height: 80px;"></div>	<p>Patient Name/Information</p> <div style="background-color: black; width: 100%; height: 100px;"></div>
<p>Type of Specimen _____</p> <p>Tumor Size _____</p>	<p>Histopathologic Type <u>Mesothelioma</u></p> <p>Laterality: <input type="checkbox"/> Bilateral <input type="checkbox"/> Left <input type="checkbox"/> Right</p>





Physician's Signature \_\_\_\_\_ Date \_\_\_\_\_

*[Handwritten signature]*

20-2

American Joint Committee on Cancer • 2002

111

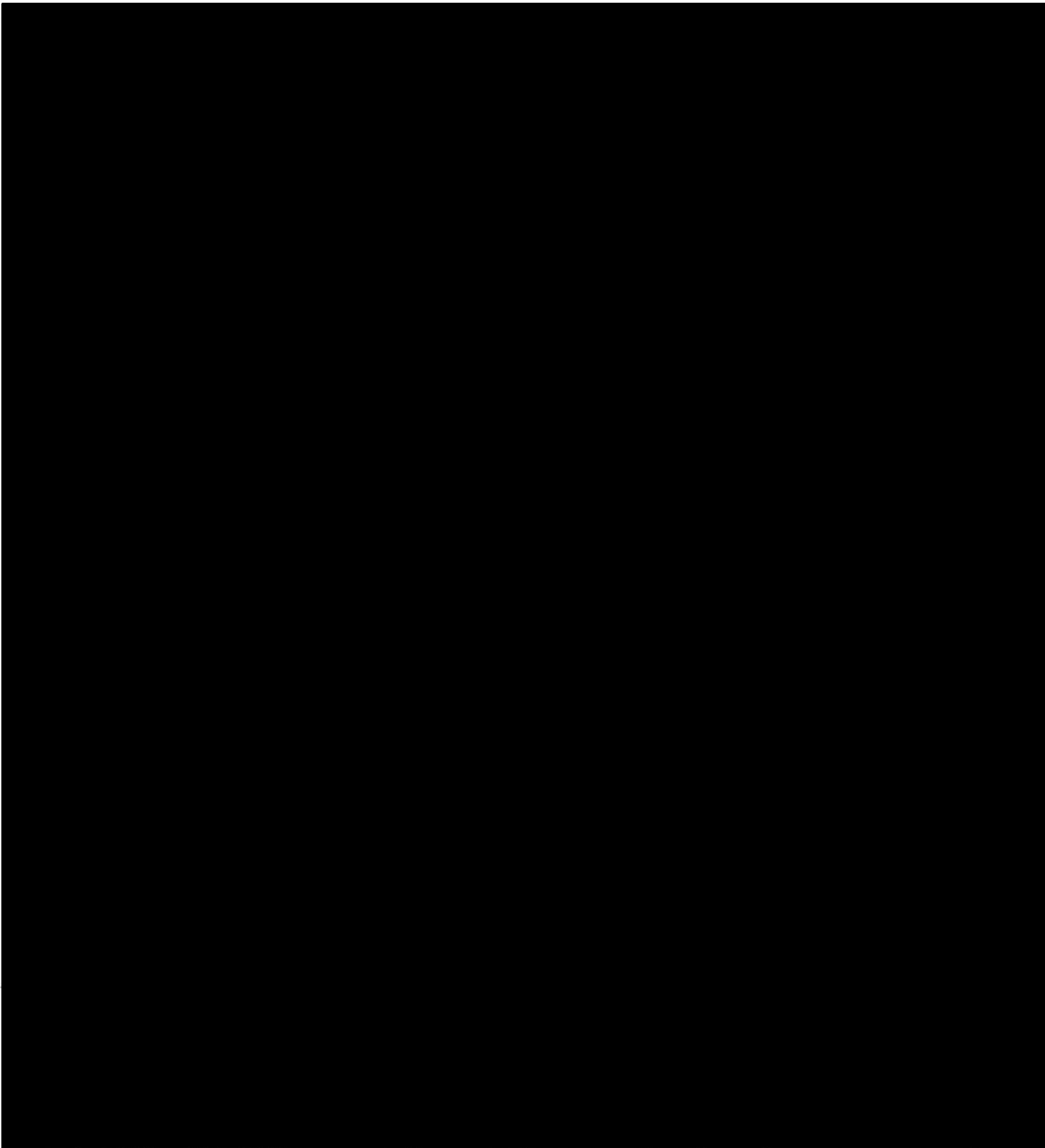
TREGGETT, ROBERT S M-59  
DR R KARMYJONE: 0000745925  
09/16/2003 DR  
P 03255-00559 07/19/1944PO

PROGRESS NOTES

M-91 (3/92)

113  
113





DR R KARMYJONE!0000745925  
09/16/2003 DR.  
PAT 03255-00559 07/19/1984PO  
SUR



PROGRESS NOTES

M-91 (3/92)

1199

115

9-18, 10

Patient Name: TREGGETT, ROBERT

MR#: 0000745925

Date of Admission: 09/16/2003 5:30 AM EDT

Unit/Rm:

Physician

cc:



Jean M Blue, MN, ARNP, for

Riyad Karmy-Jones, MD

MLS: 55015

D: Thu Sep 18 17:42:43 2003 EST

T: Thu Sep 18 17:50:37 2003 EST

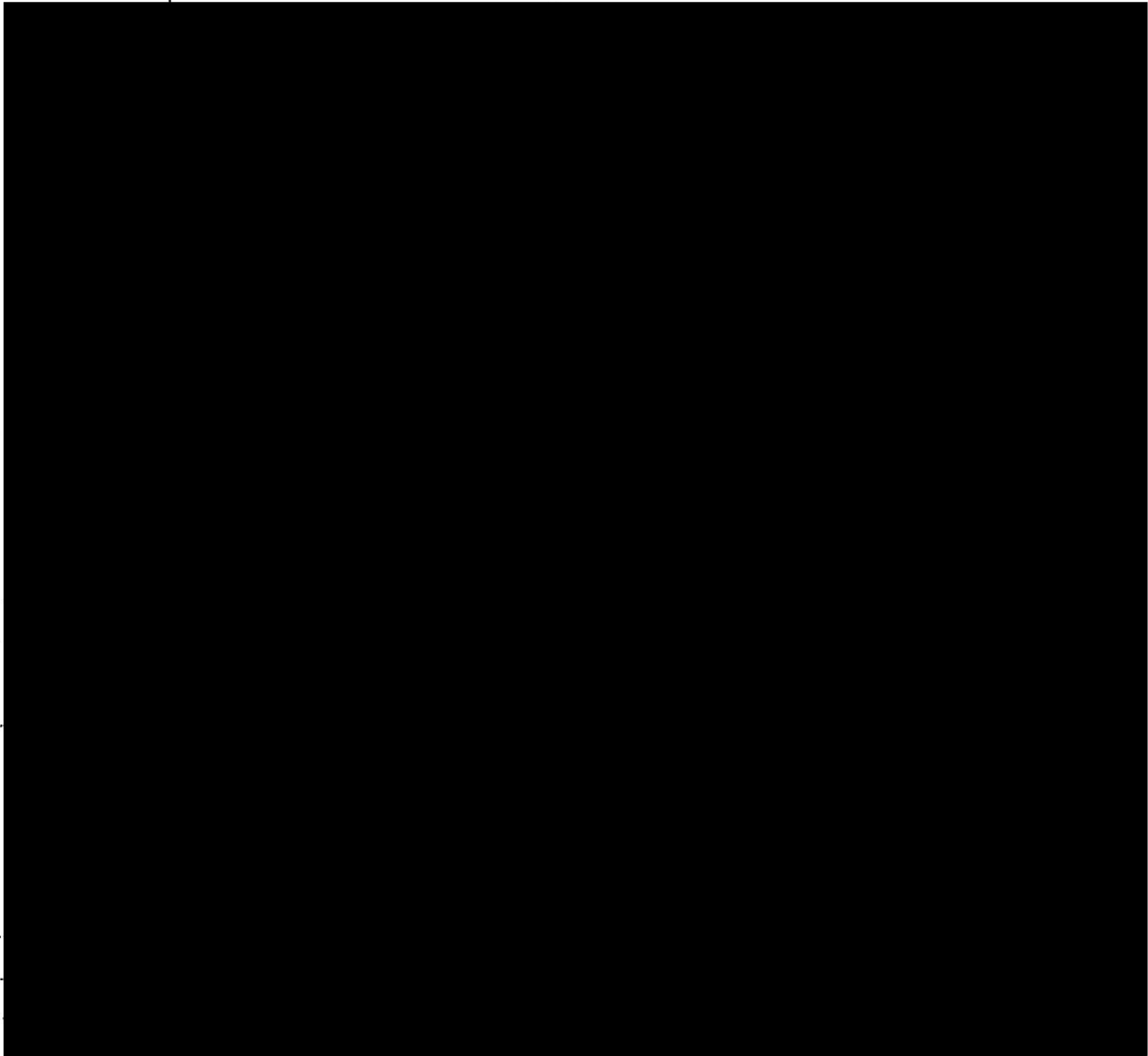
60596146

HISTORY AND PHYSICAL EXAMINATION

89

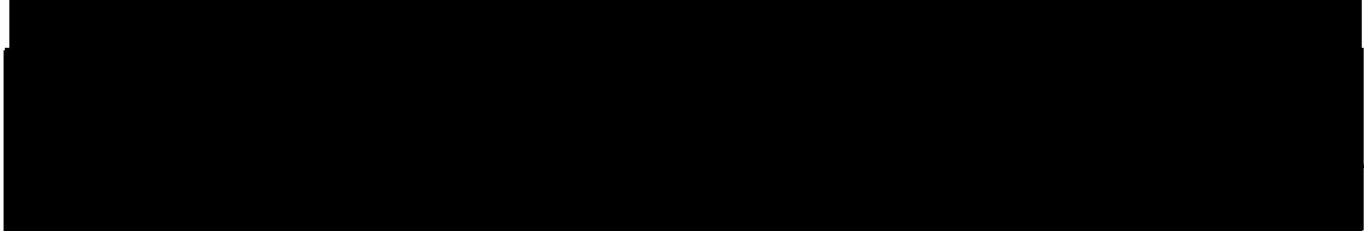
99

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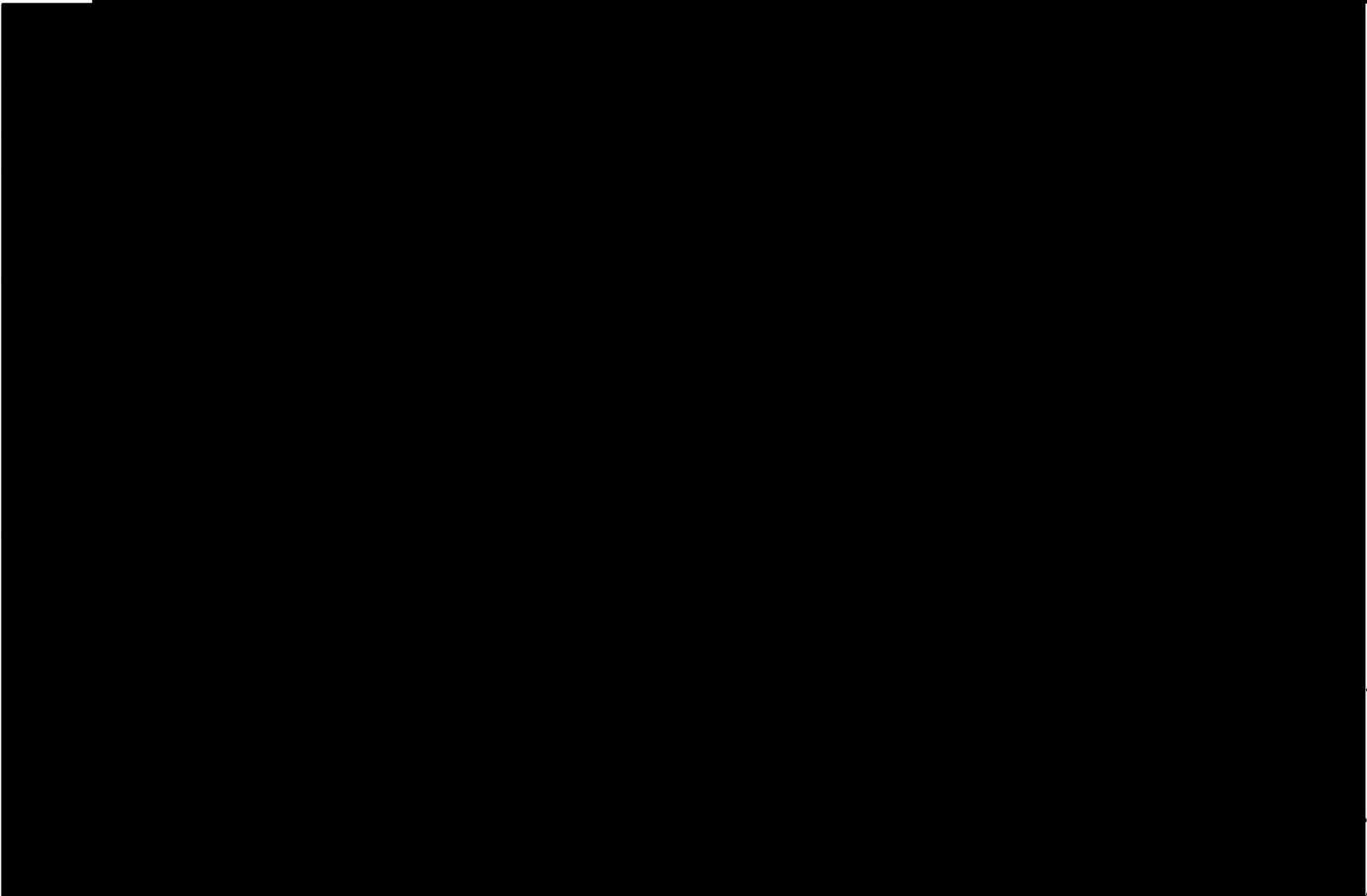
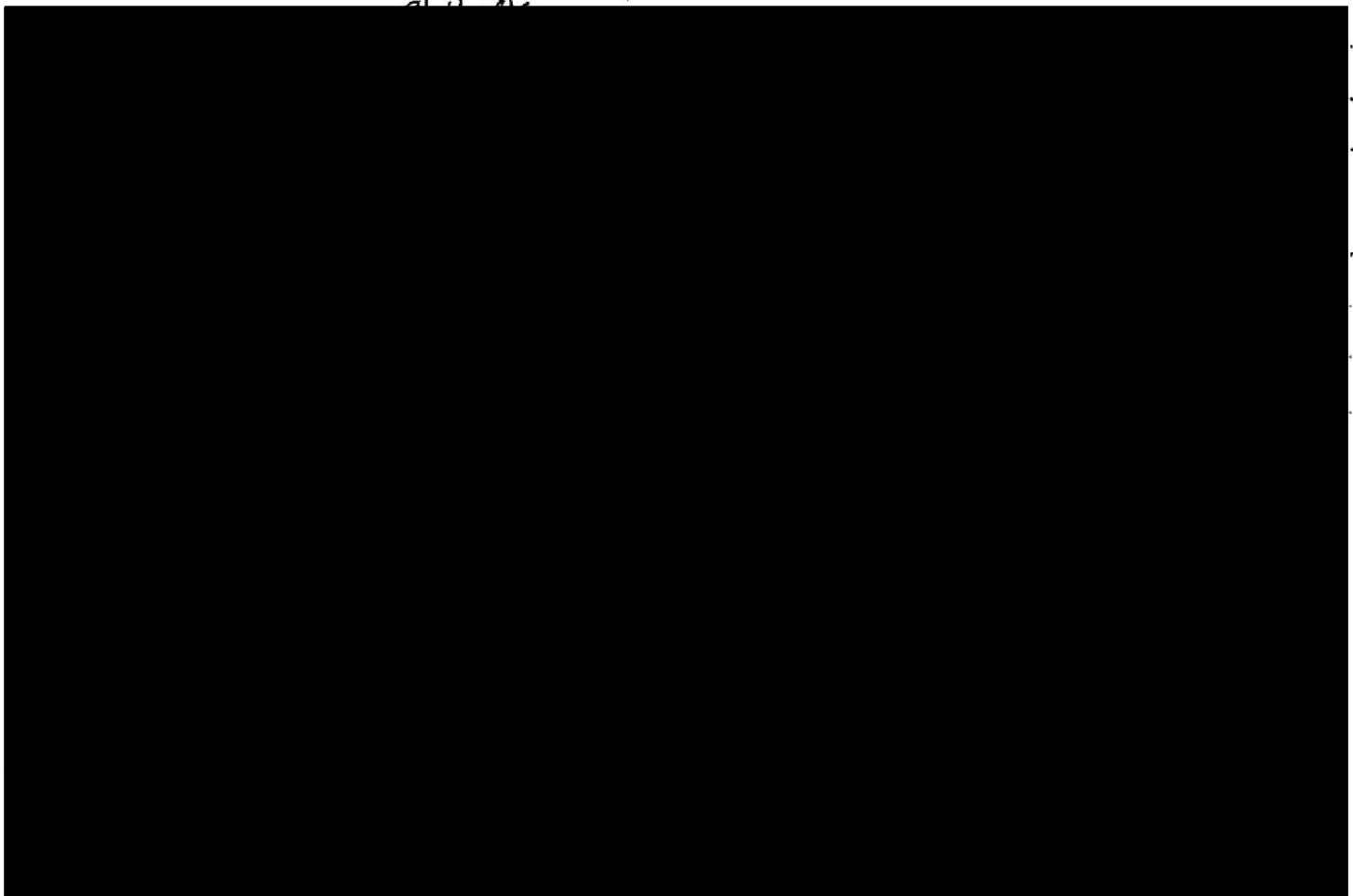


Social Hx: He is interested in going to Shenandoah Valley this coming weekend for a family reunion. This has been in planning for a long time. He will be back on September 29.

ROS: Minimal pain, cough, SOB at this time.



No labs today.



[REDACTED]

*Samuel P. Hammar, M.D., FCCP, FCAP, Director*  
*Keith O. Hallman, M.D.*  
*David M. Bray III, M.D.*  
*Richard A. Cox, M.D., Ph.D.*

[REDACTED]

September 30, 2003

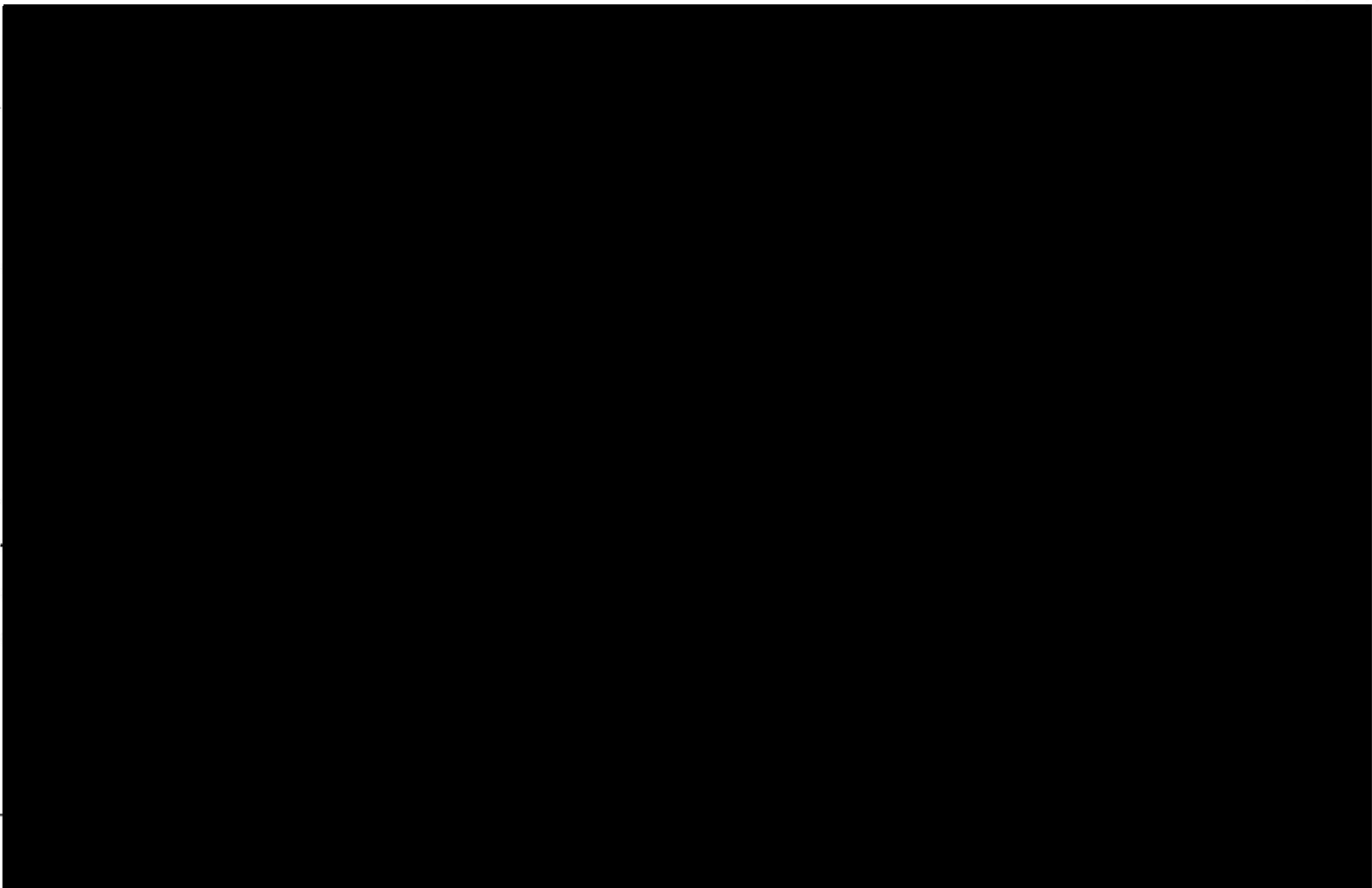
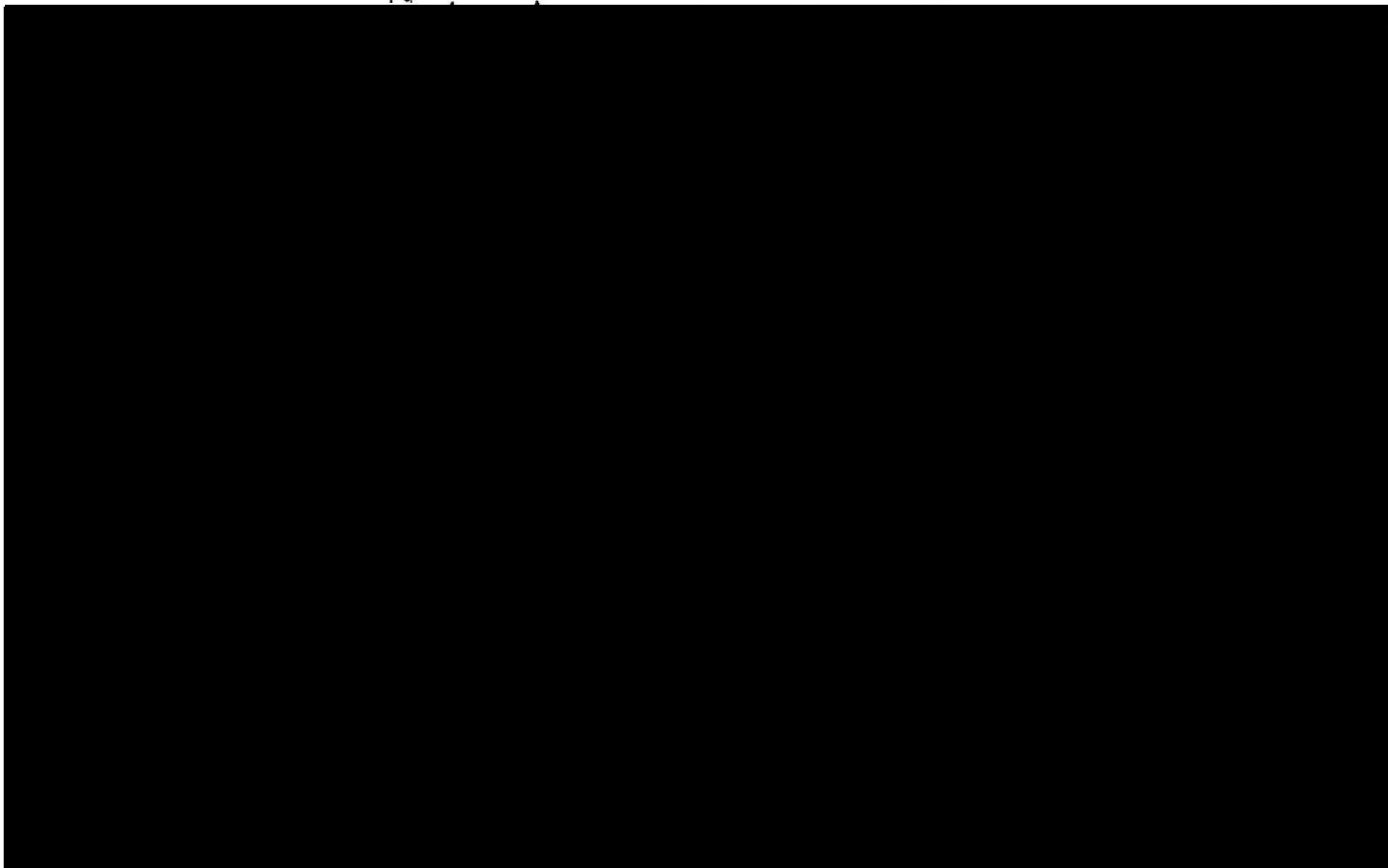
[REDACTED]

Fax: (206) 368-1163

Re: *TREGGETT, ROBERT S*  
*Your S03-7149/S03-7389*  
*Our D03-641*

[REDACTED]

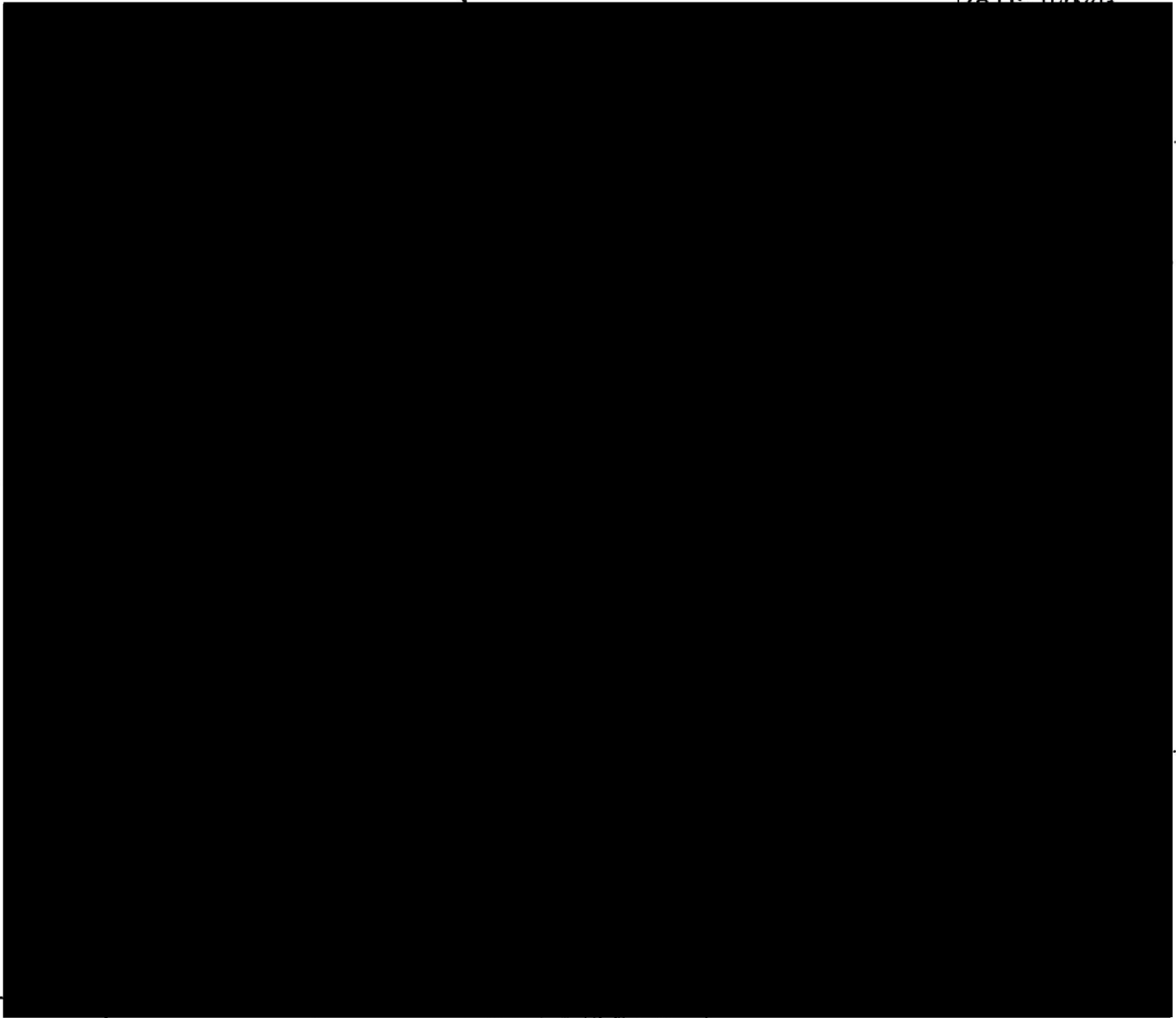




RE: TREGGETT, Robert

*Kau*

DATE: 10/8/02

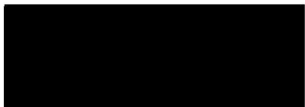


TranscriptView

Page 1 of 4 83

TREGGETT, ROBERT S U2880780  
Letter Authenticated  
Service date: 15-oct-2003  
Dictated by Vallieres, MD, Eric on 15-oct-2003

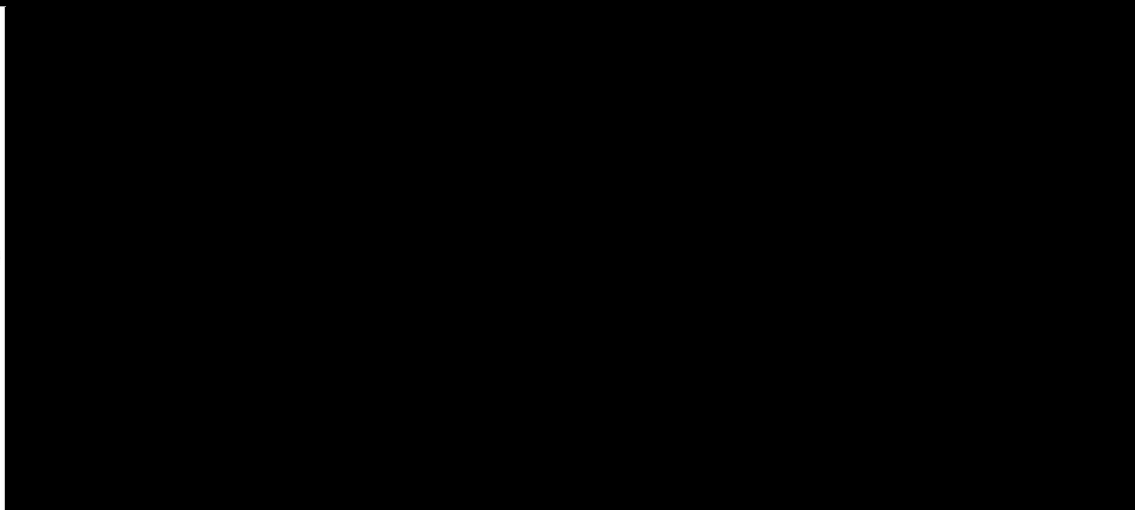
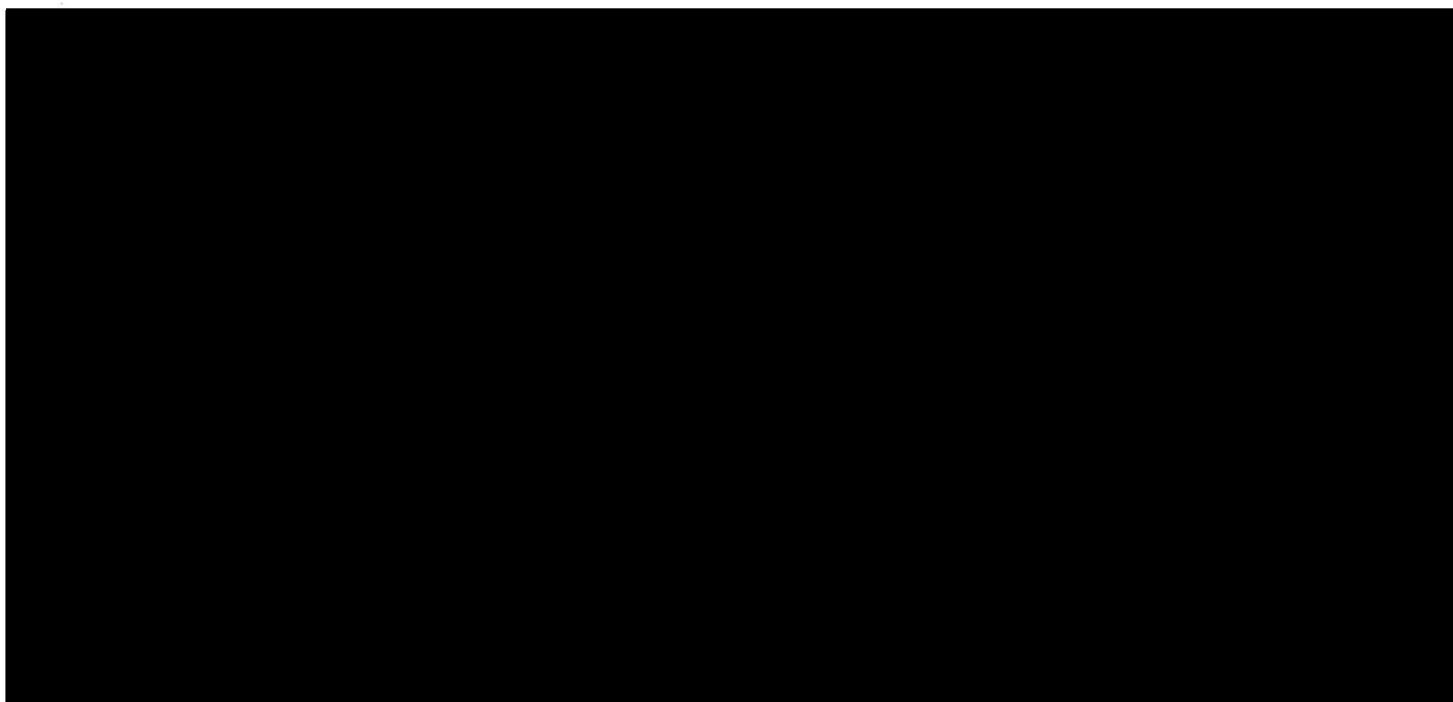
October 15, 2003

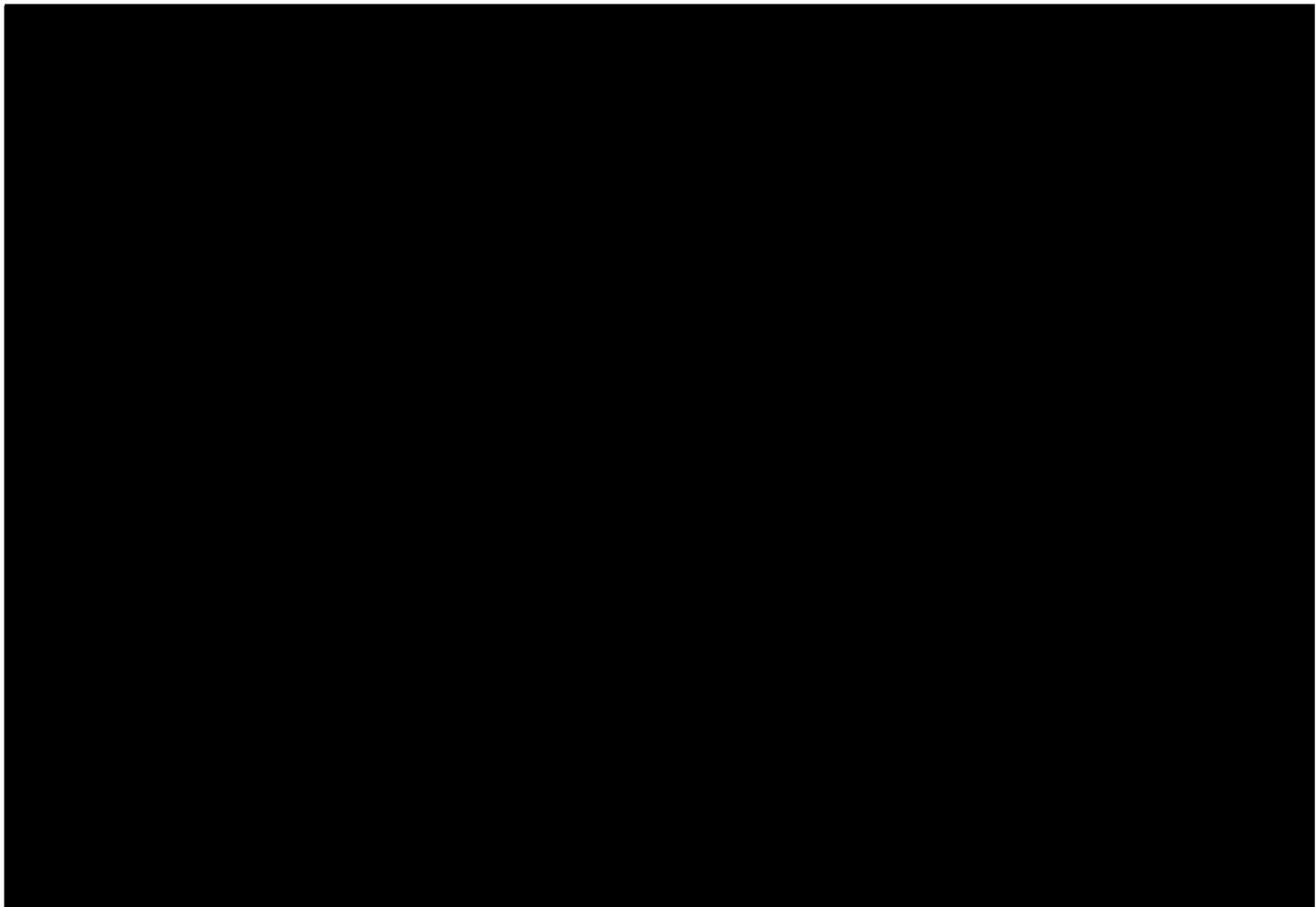


Re: TREGGETT, ROBERT S

Unknown MRN

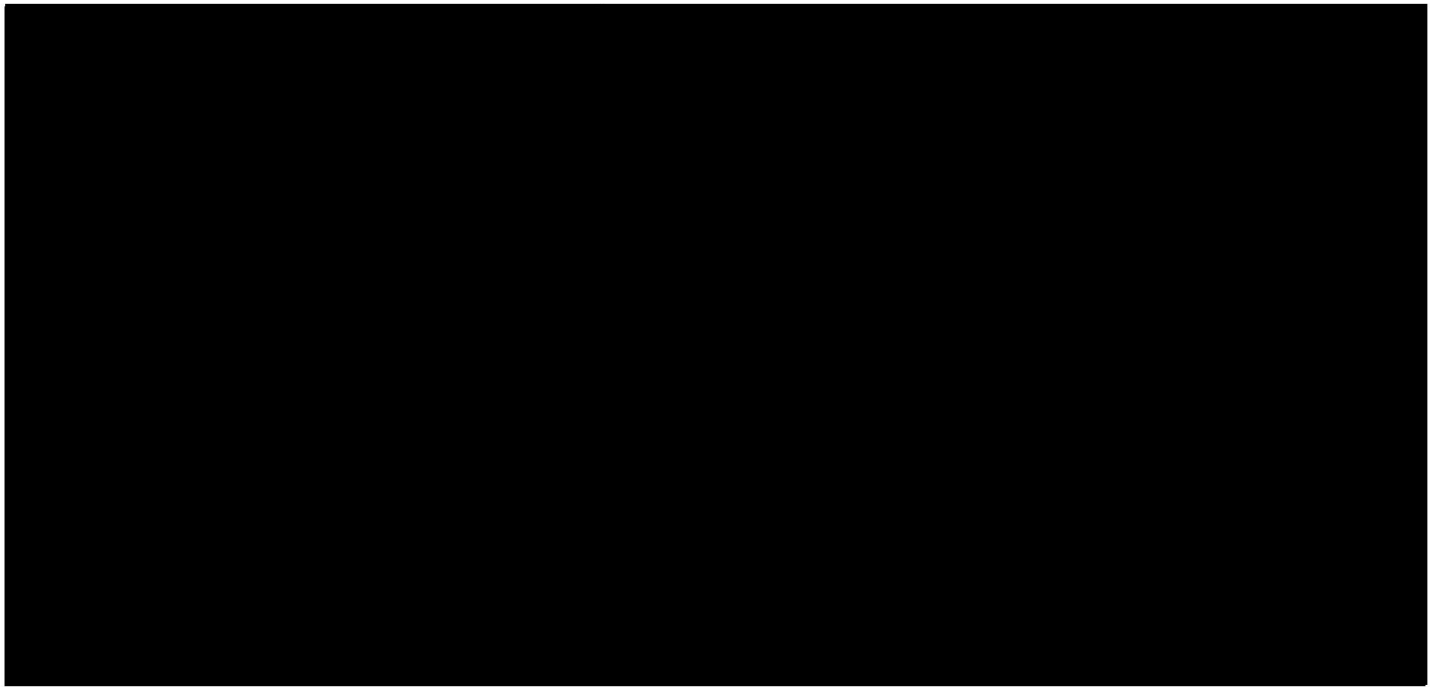
Dear Riyad:

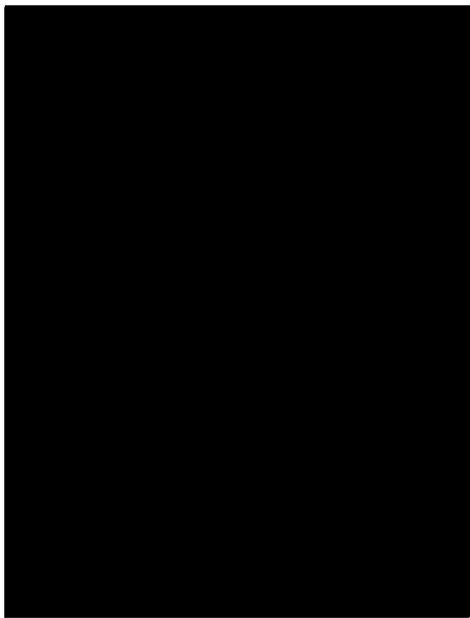
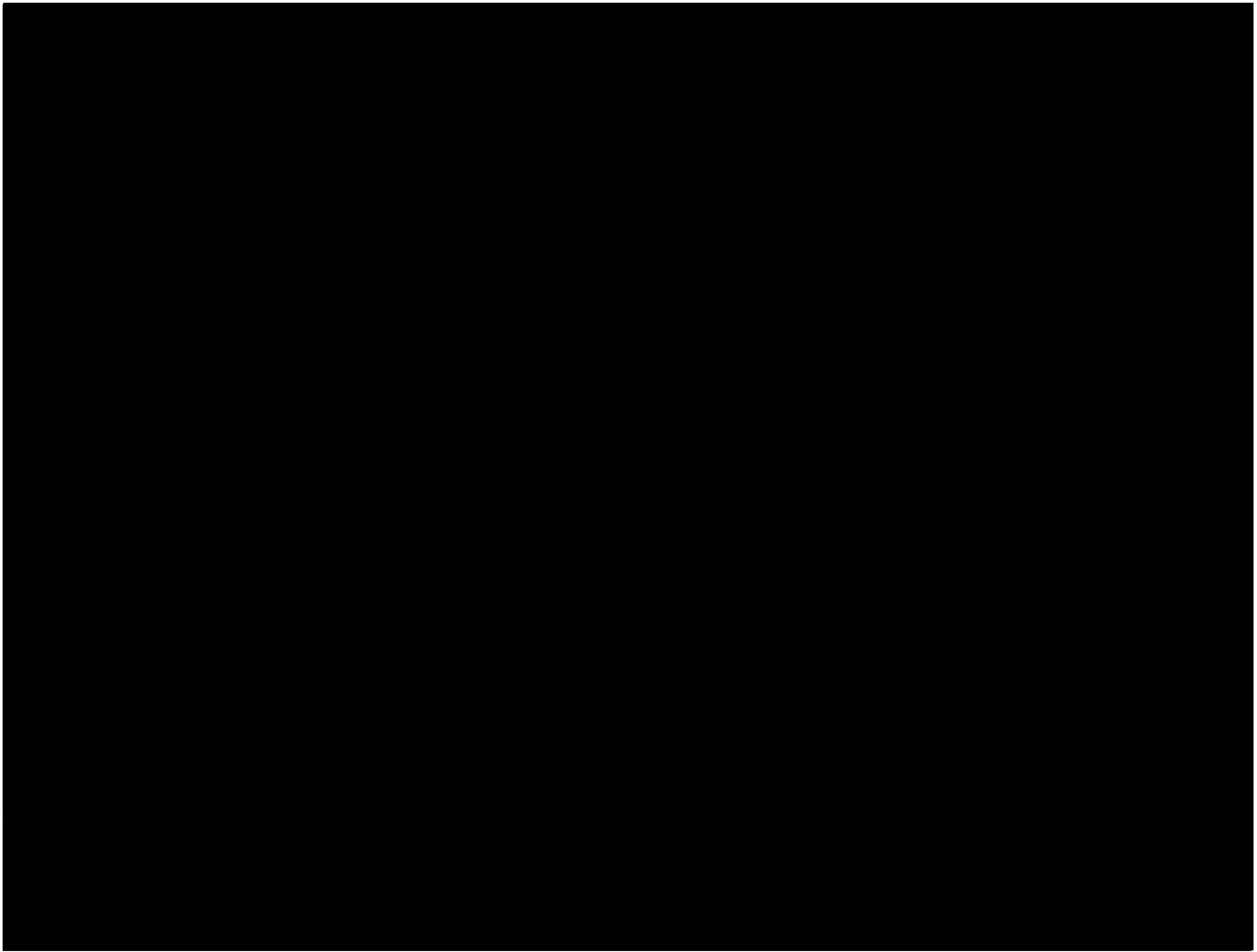




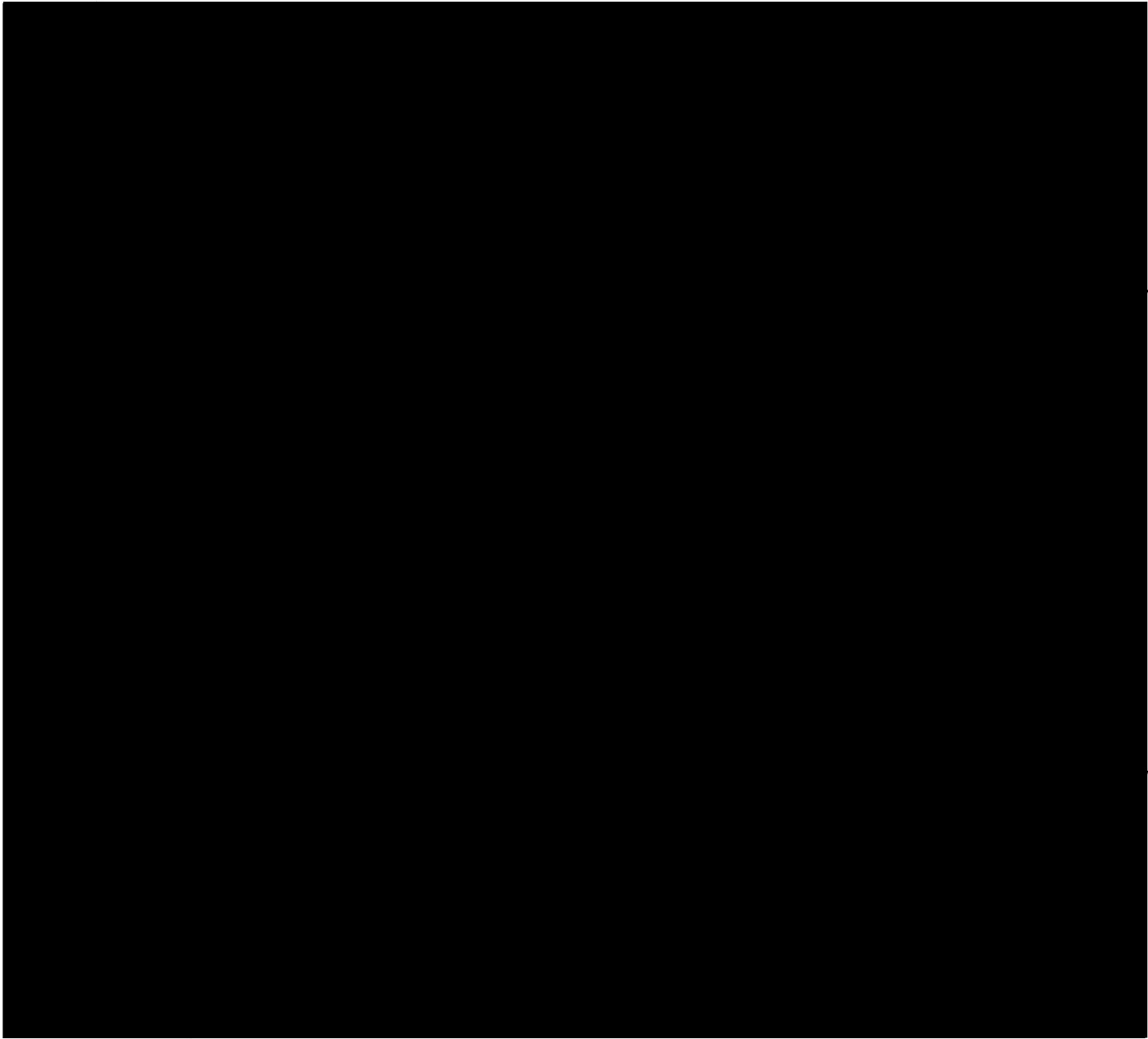
#### SOCIAL HISTORY

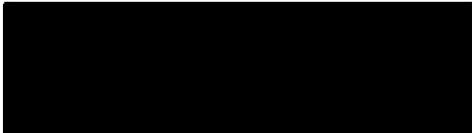
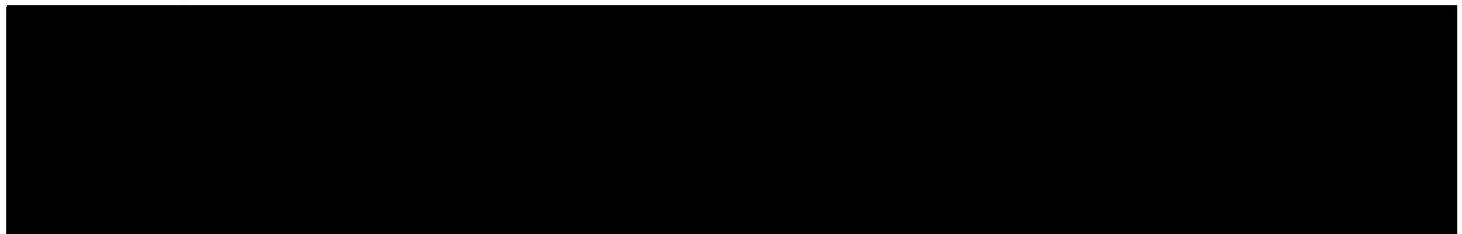
He has no significant alcohol intake. He has had asbestos exposure being a machinist in the Navy, submarines, and insulating pipes from 1967 to 1972. Since then he has worked for 18 years as a locomotive engineer, and more recently as a maintenance supervisor in Shoreline. He is married. His wife has good health. He has one natural daughter who lives in Utah.







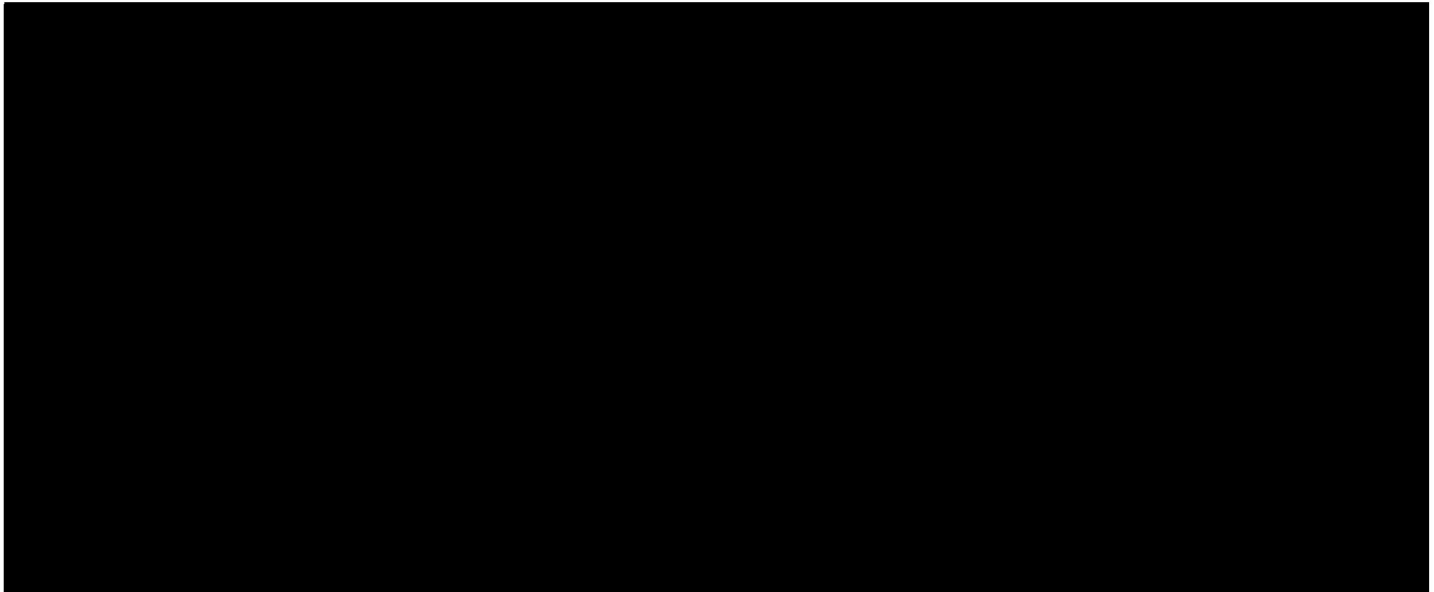




7 11



Social Hx: He continues to work, goes to night school on Tuesday, so Wednesdays would be a better day.

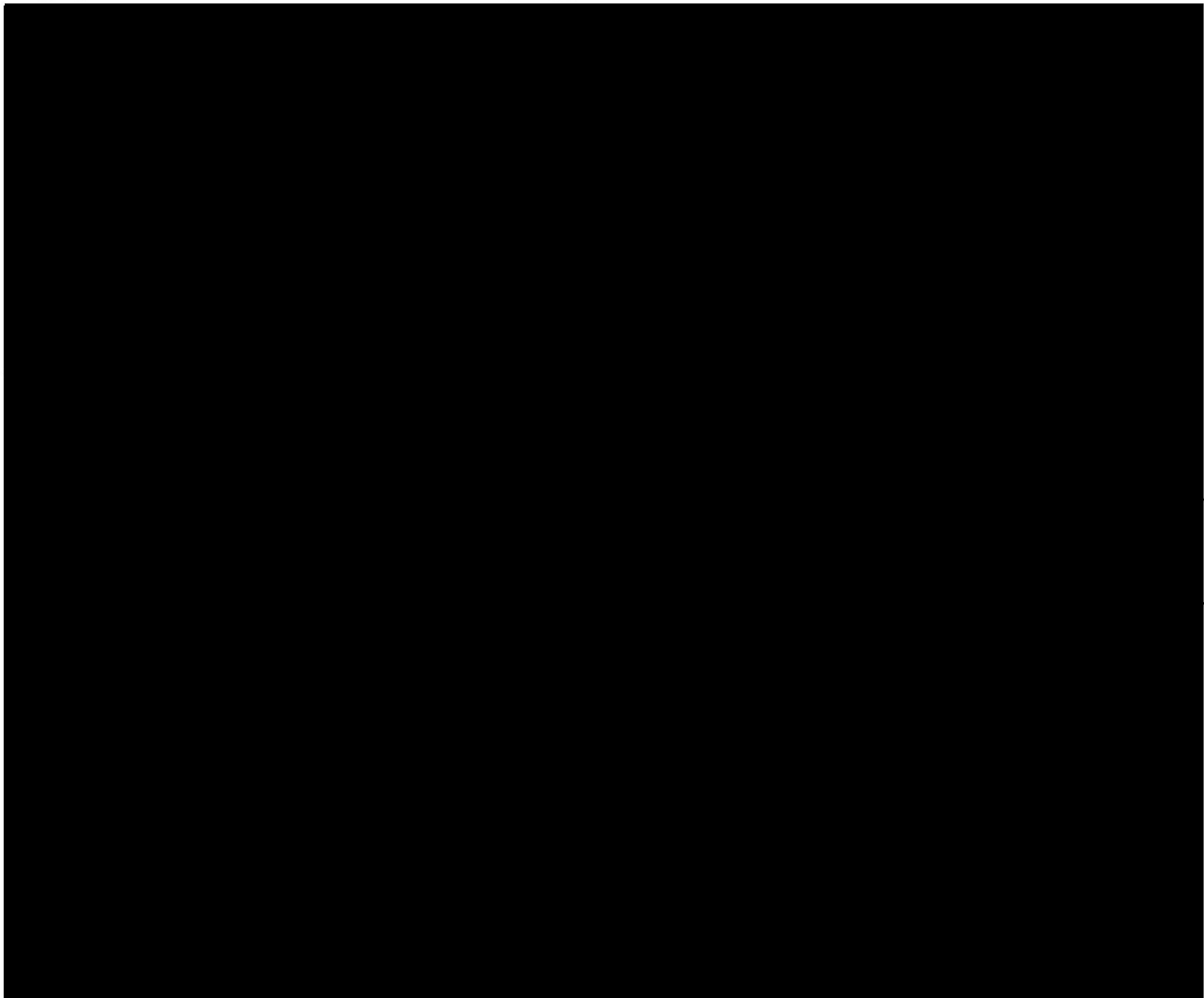




Name: TREGGETT, ROBERT S. ID: 10240302 Date: 27-Oct-03  
 Race: Caucasian Height: 67.00 in Weight: 195.0 lbs Sex: M  
 Room: PET LAB BSA: 2.00 Age: 59 yr  
 Dr. : [Redacted] Technician: SUZANNE SOLIS, CRTT

Diagnosis: MESOTHELEOMA 163.8

Occup. Exposure: ASBESTOS 1960'S  
 Dyspnea History: On hills and stairs



13729



Name: TREGGETT, ROBERT S. ID: 10240302 Date: 27-Oct-03  
Race: Caucasian Height: 67.00 in Weight: 195.0 lbs Sex: M  
Room: PFT LAB BSA: 2.00 Age: 59 yr  
Dr. : [Redacted] Technician: SUZANNE SOLIS, CRTT



178 13



Patient Name: TREGGETT, ROBERT

Test #:

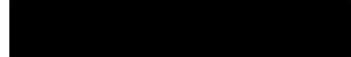
MR#: 0000745925

Date of Testing: 10/27/2003

Unit/Rm:

*ep*  
*10/29*

Interpreting Physician:



cc:



*Christopher D. Beaty*

Christopher D Beaty, MD

MLS: 95244

D: Mon Oct 27 19:52:01 2003 EST

T: Thu Oct 30 11:33:57 2003 EST

60642936

**PULMONARY FUNCTION TEST  
INTERPRETATION**

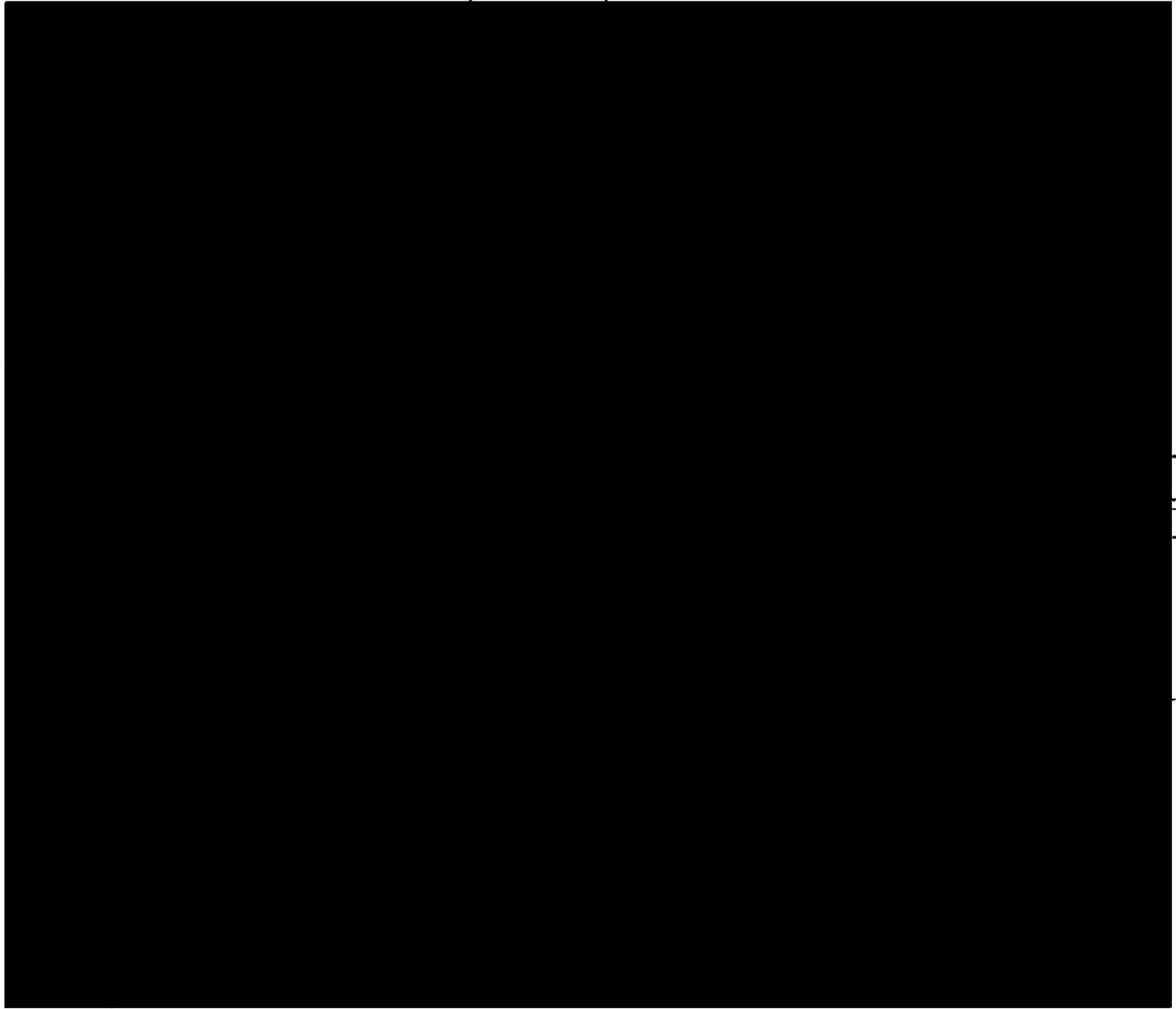
*129*

13

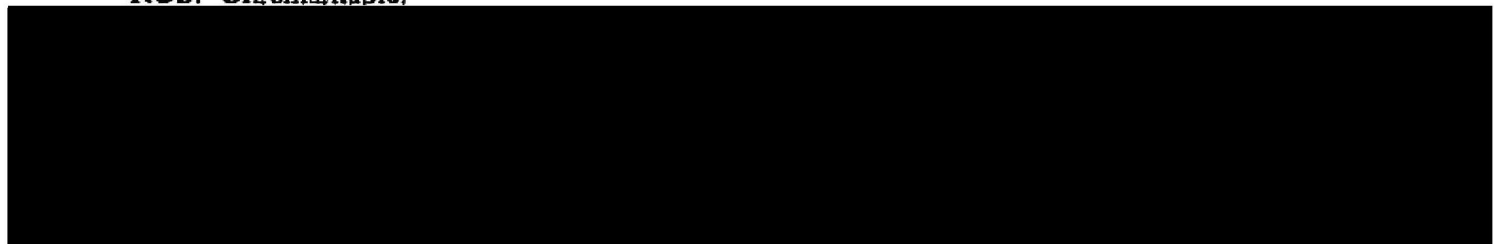
DATE 11.5.03  
Standing BP 124/90  
Resp. Rate \_\_\_\_\_  
Pulse \_\_\_\_\_ Temp \_\_\_\_\_

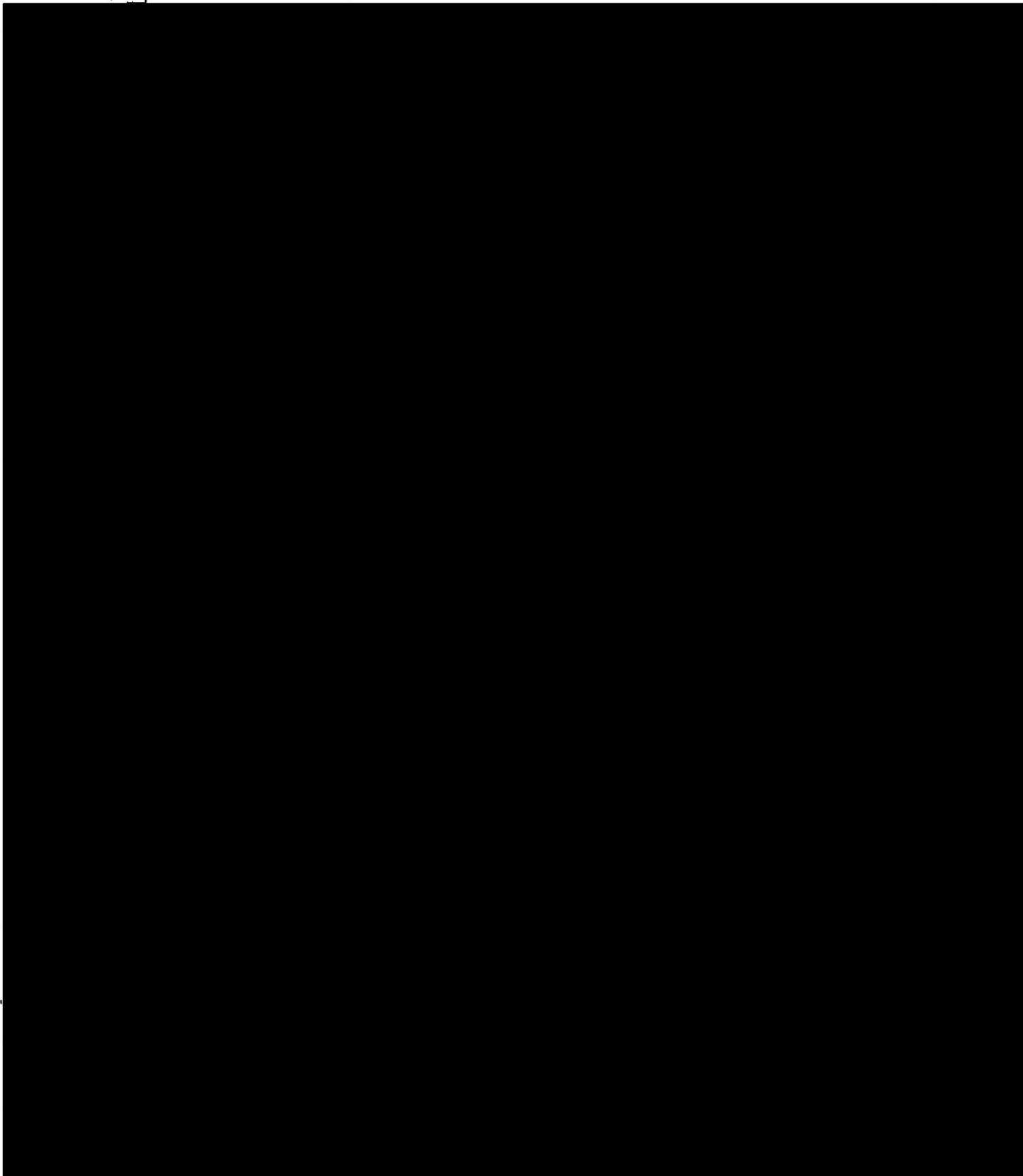
OFFICE VISIT E/M-History & Exam 0 = Pos., √ = Neg.

*Christy Ministry*

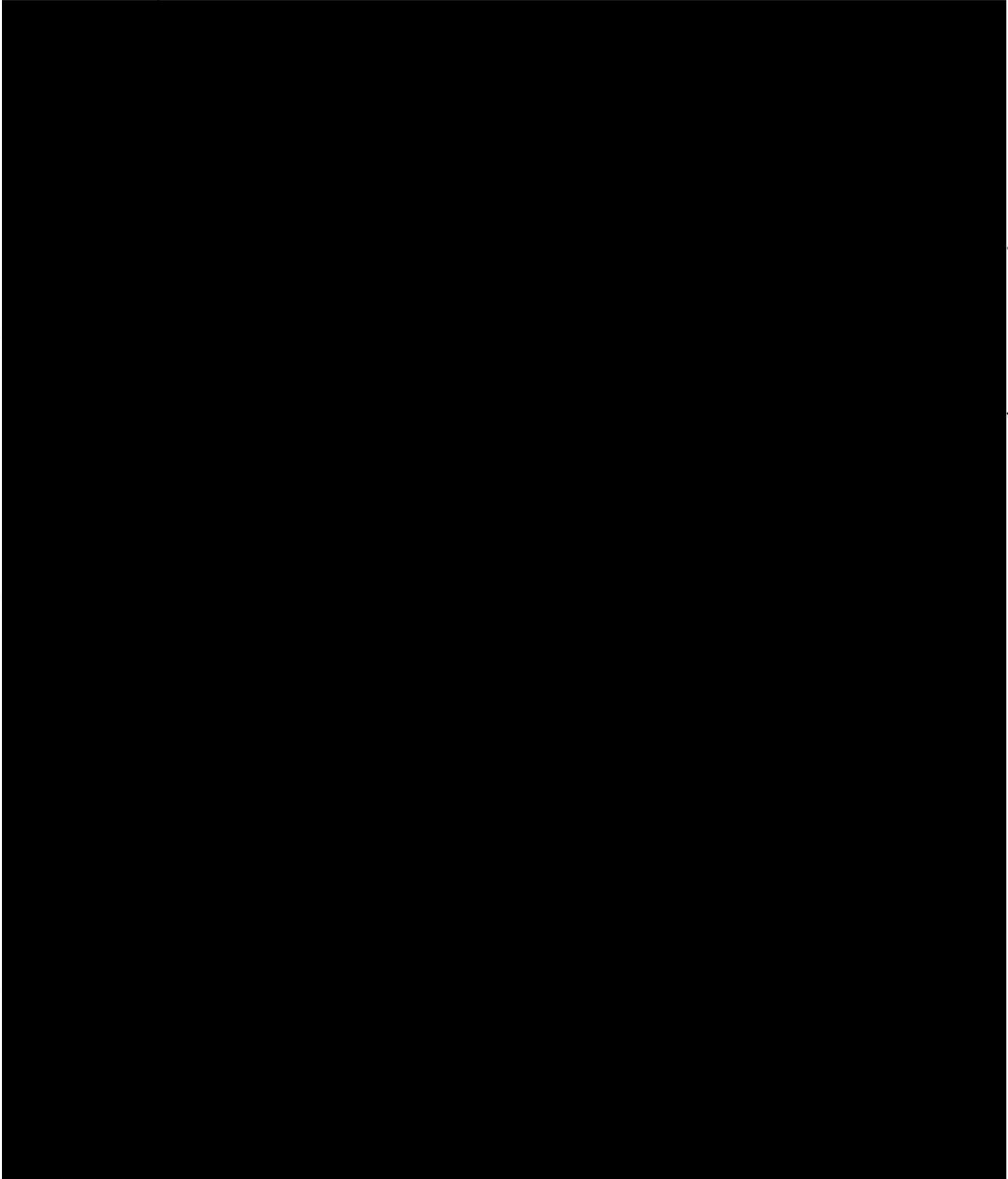


Social Hx: He continues to go to school in the evenings. He is volunteering at the church.  
ROS: Unremarkable.



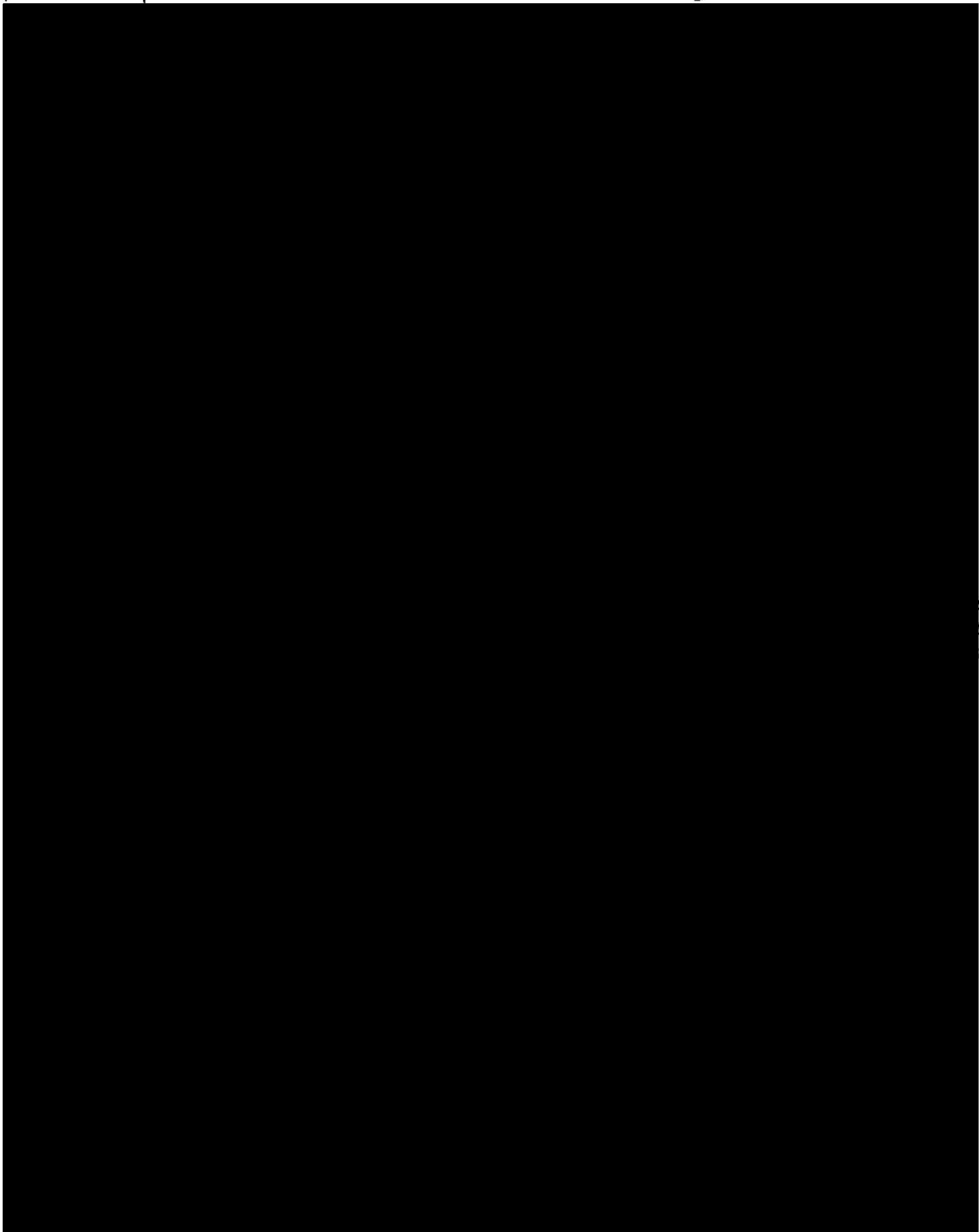


Social Hx: They are planning to go down to California next week to visit family. He is doing volunteer work at the church.

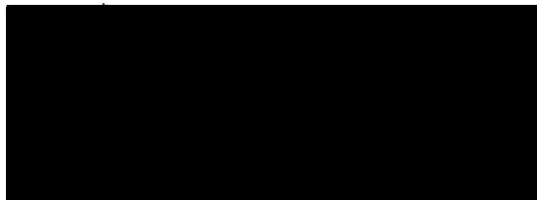


Social Hx: They are planning to go down to California next week to visit family. He is doing volunteer work at the church.

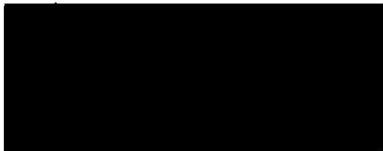






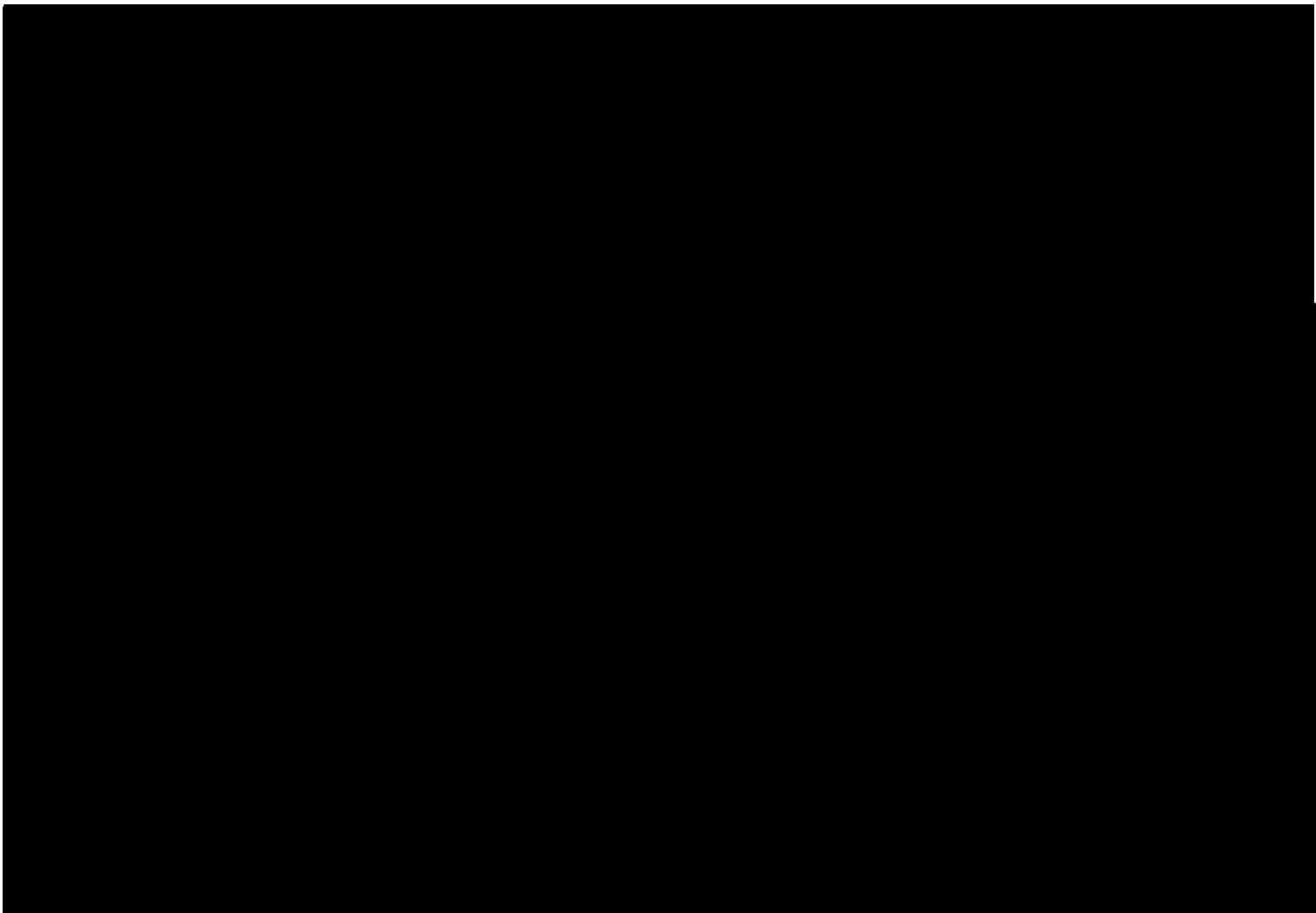


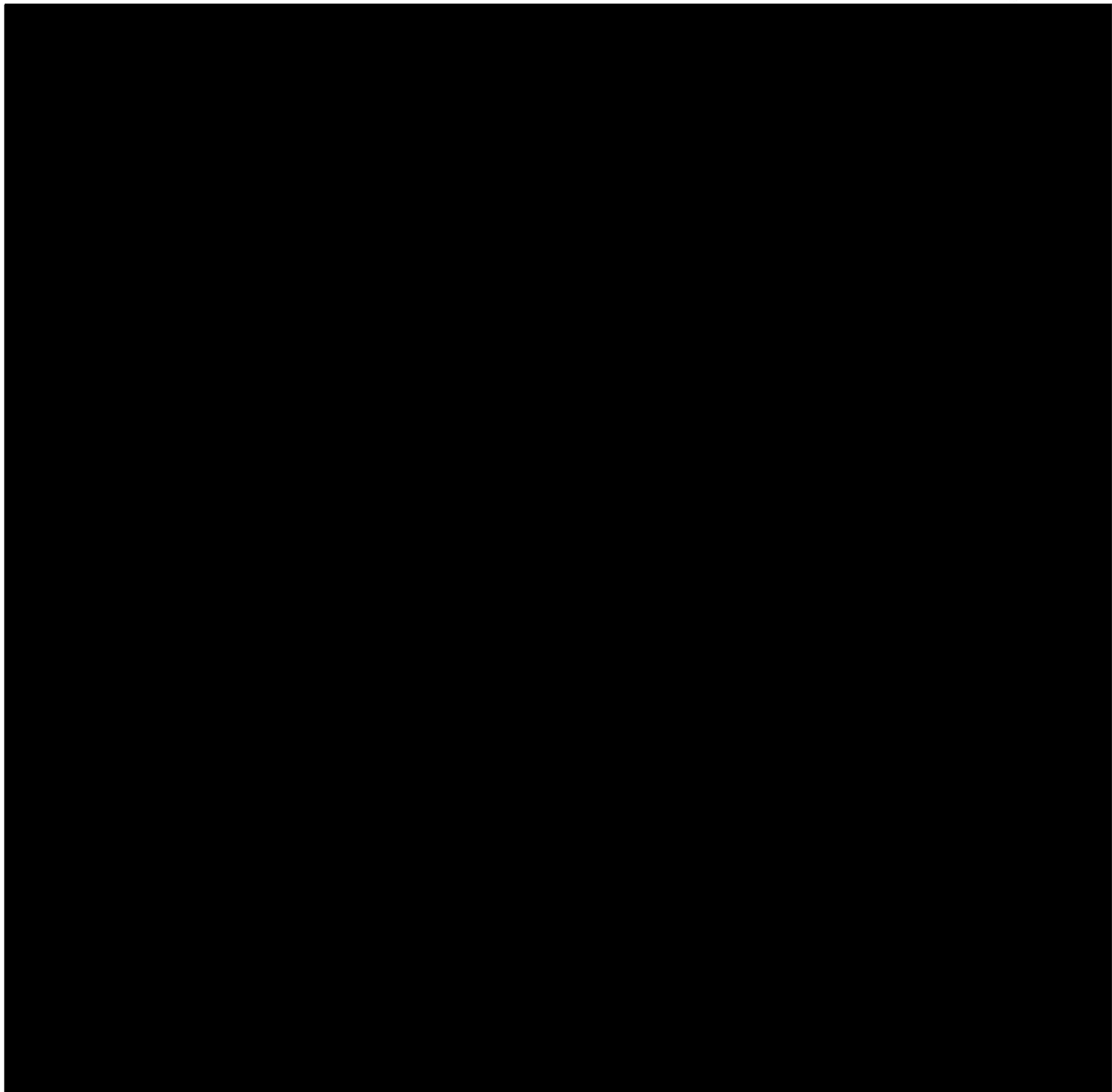
December 3, 2003



Re: TREGGETT, ROBERT S  
U2880780

Dear David:





Patient Name: TREGGETT, ROBERT S  
Medical Record Number: U2880780

Event Date: 12/3/2003  
Accession Number:

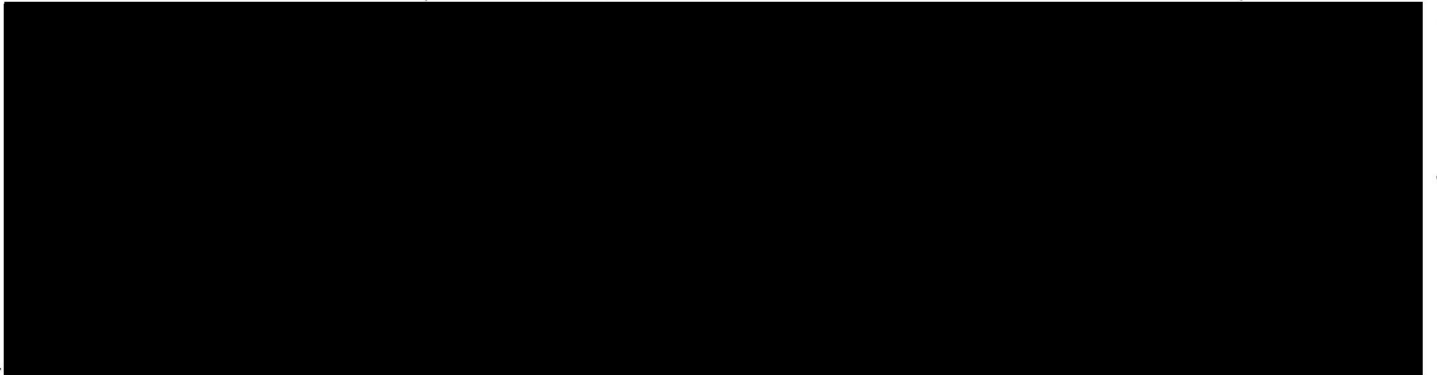




**PATIENT DIAGNOSTIC REPORT**

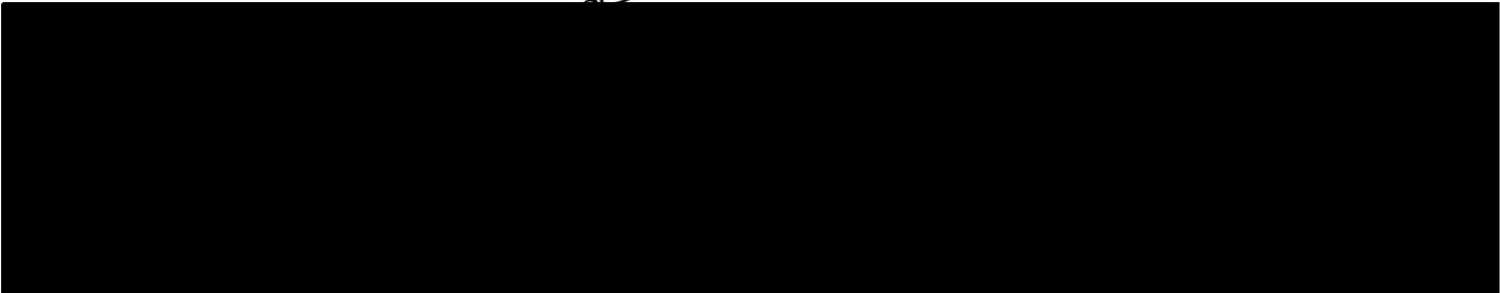
*Verified*

**PATIENT NAME: TREGGETT, ROBERT S**

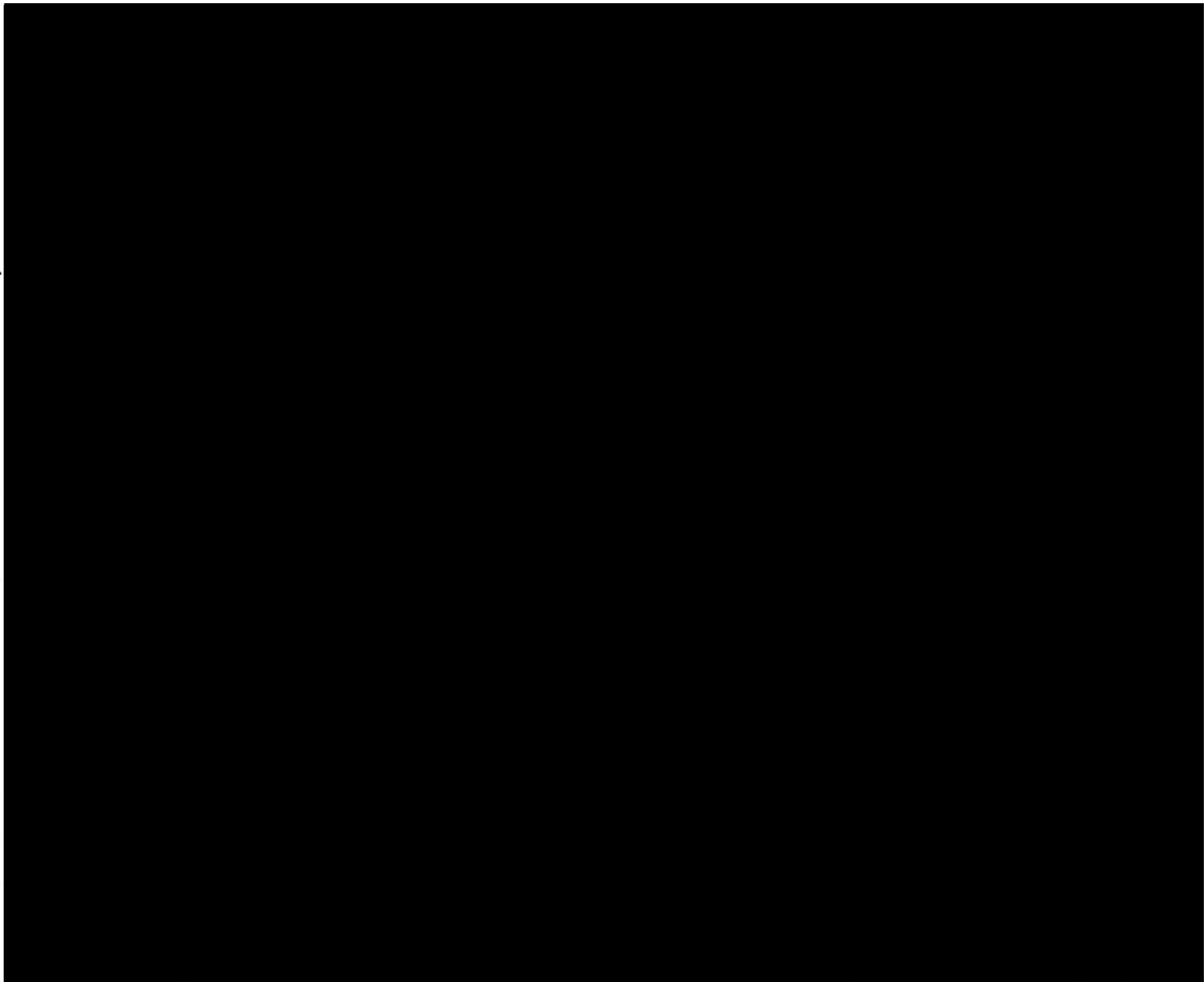


RE: TREGGETT, Robert

Date: 12/10/2003

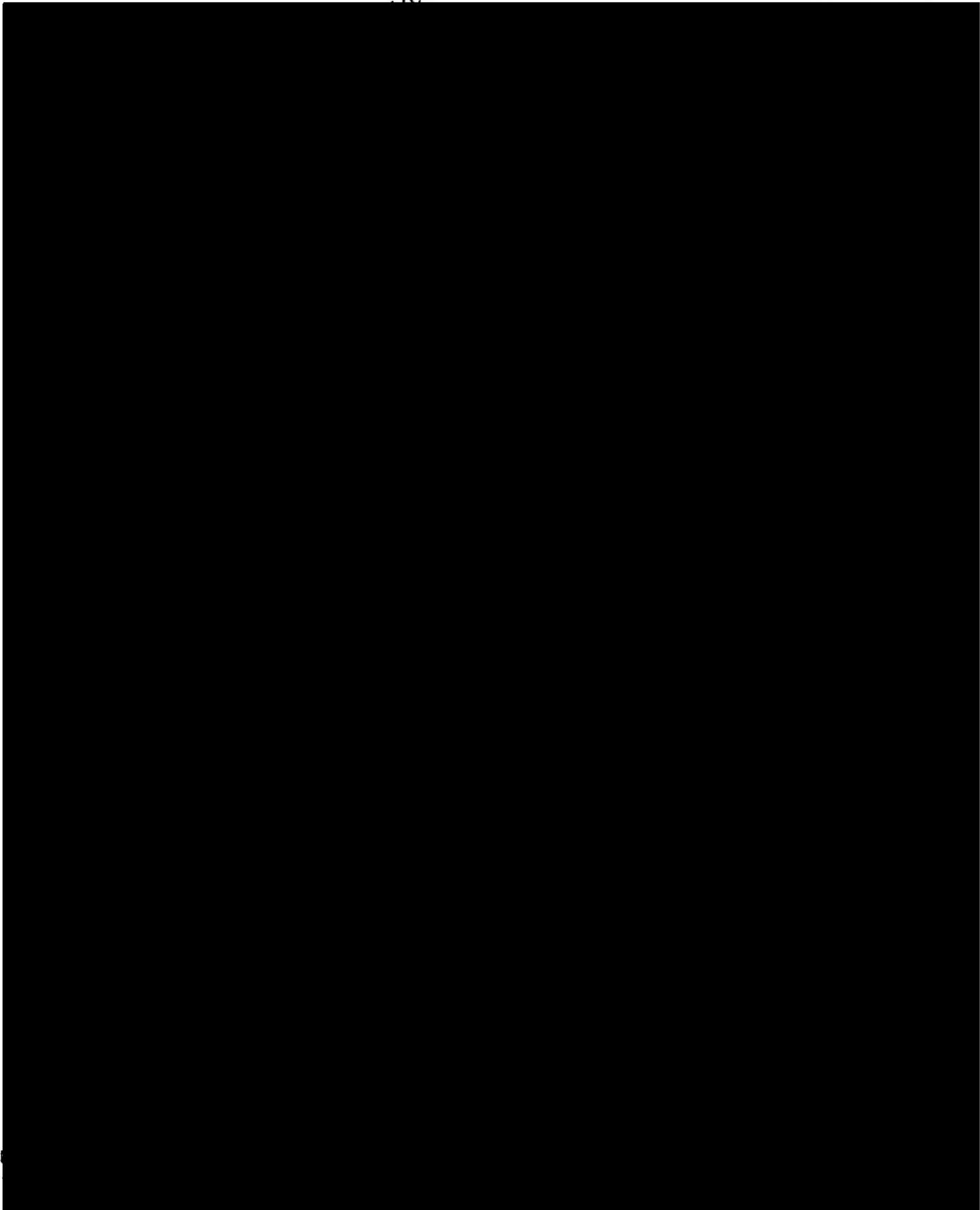


**SOCIAL HISTORY:** Continues to volunteer at Crista and Church at this time, on Disability.



RE: TREGGETT, Robert

DATE: 12/17/03

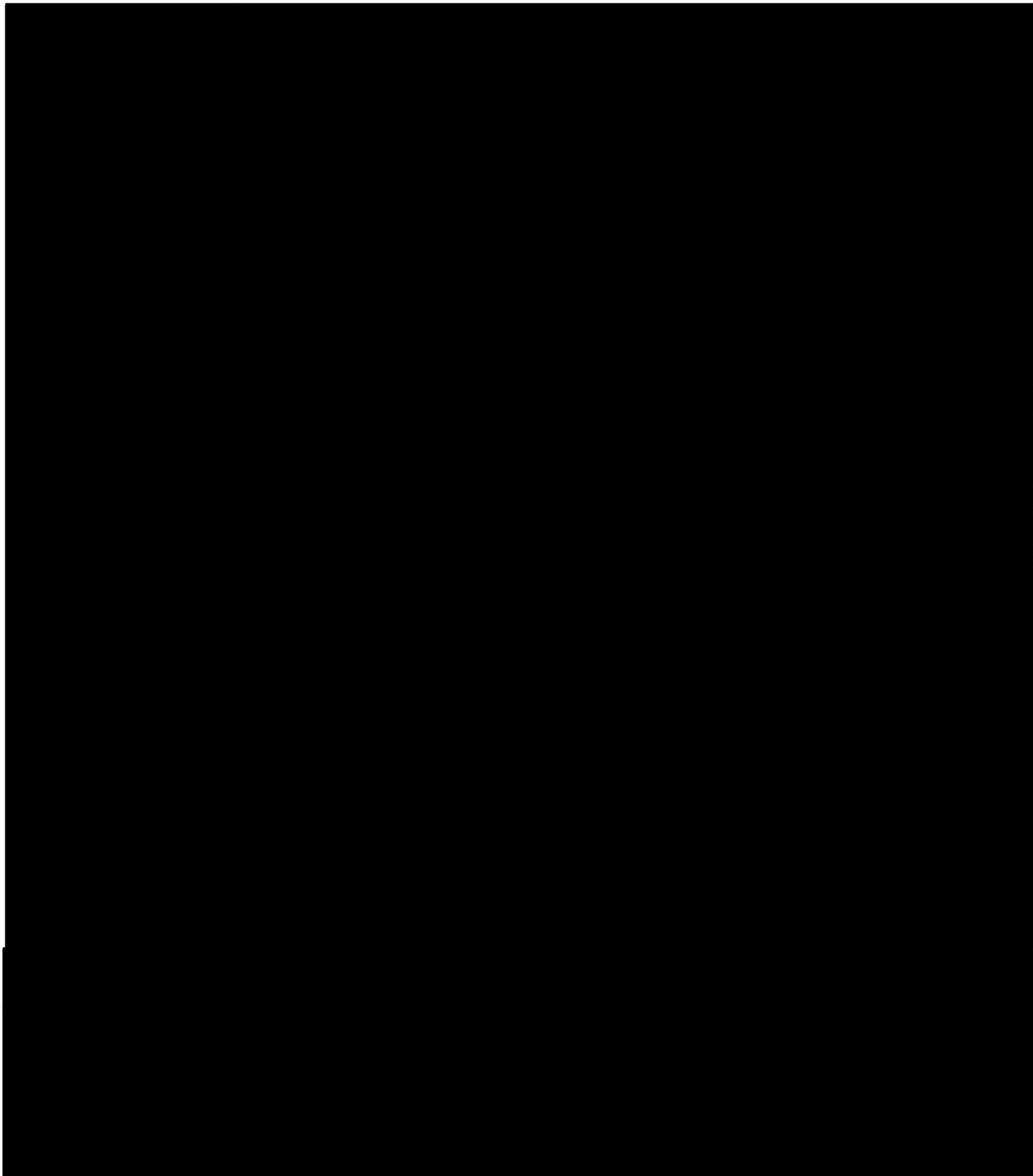


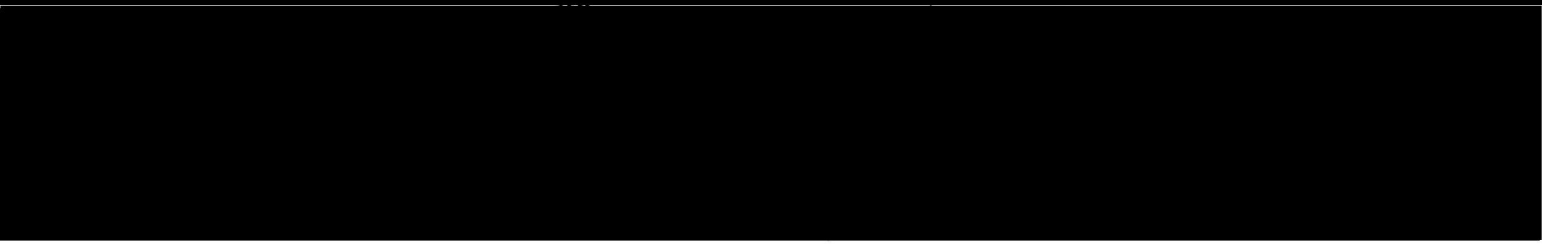
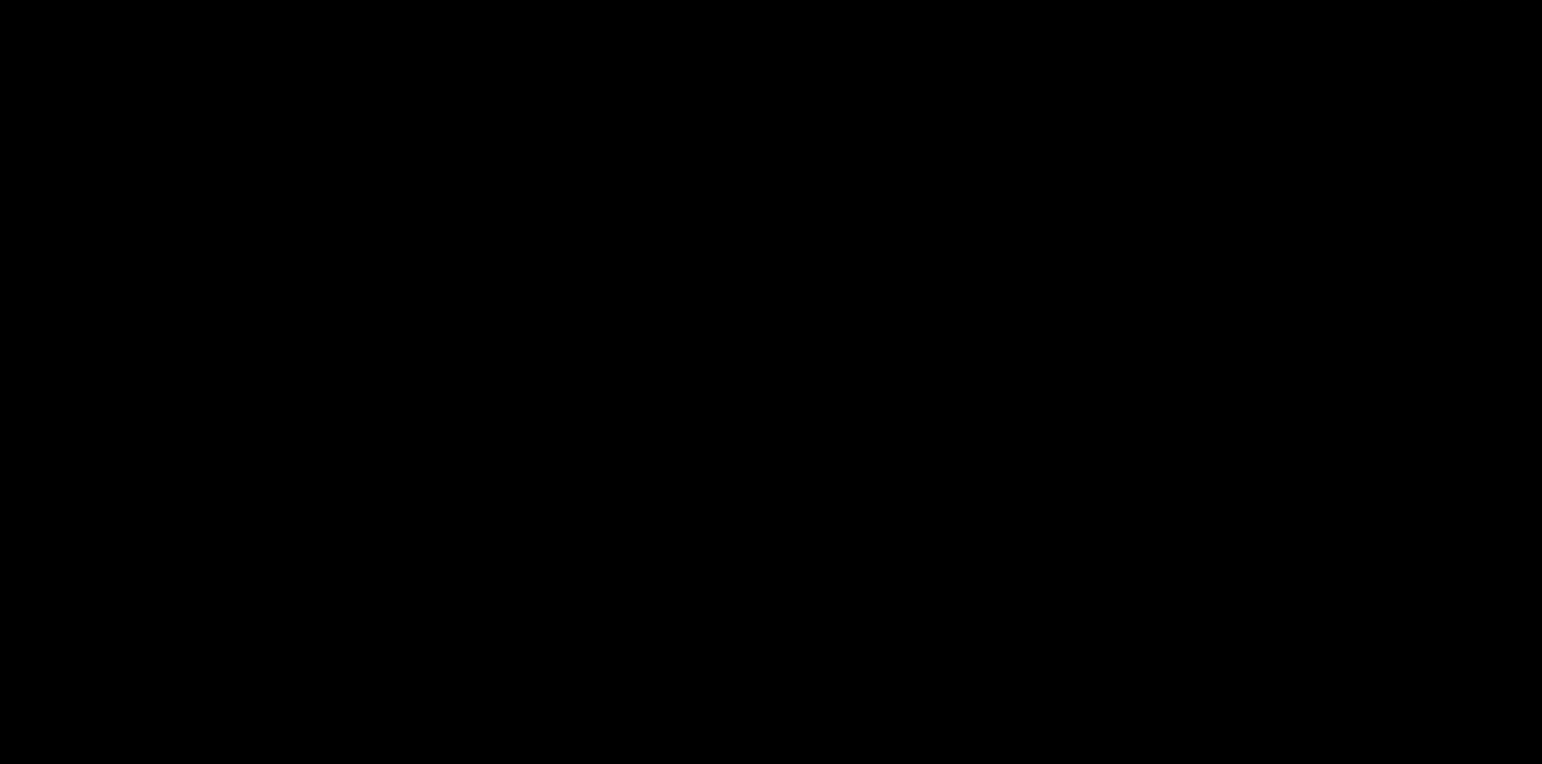
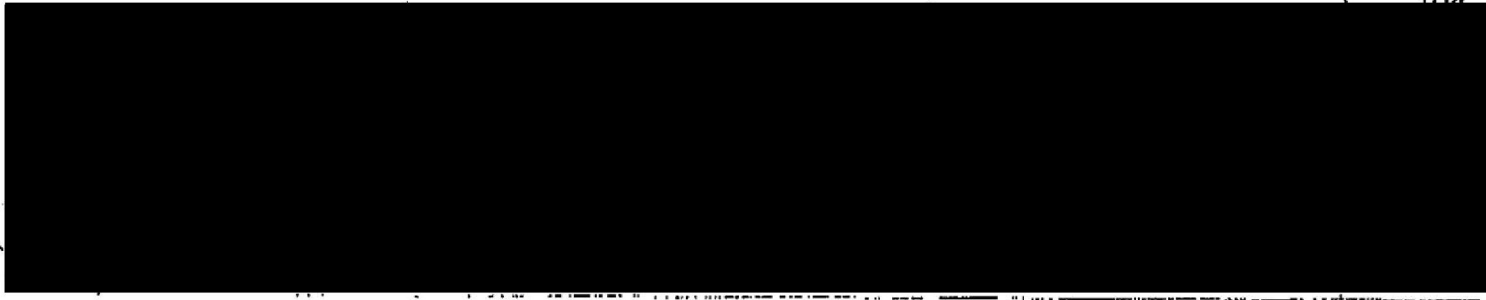


DATE 1/9/04  
Standing BP 130/72  
Resp. Rate 14  
Pulse \_\_\_\_\_ Temp \_\_\_\_\_

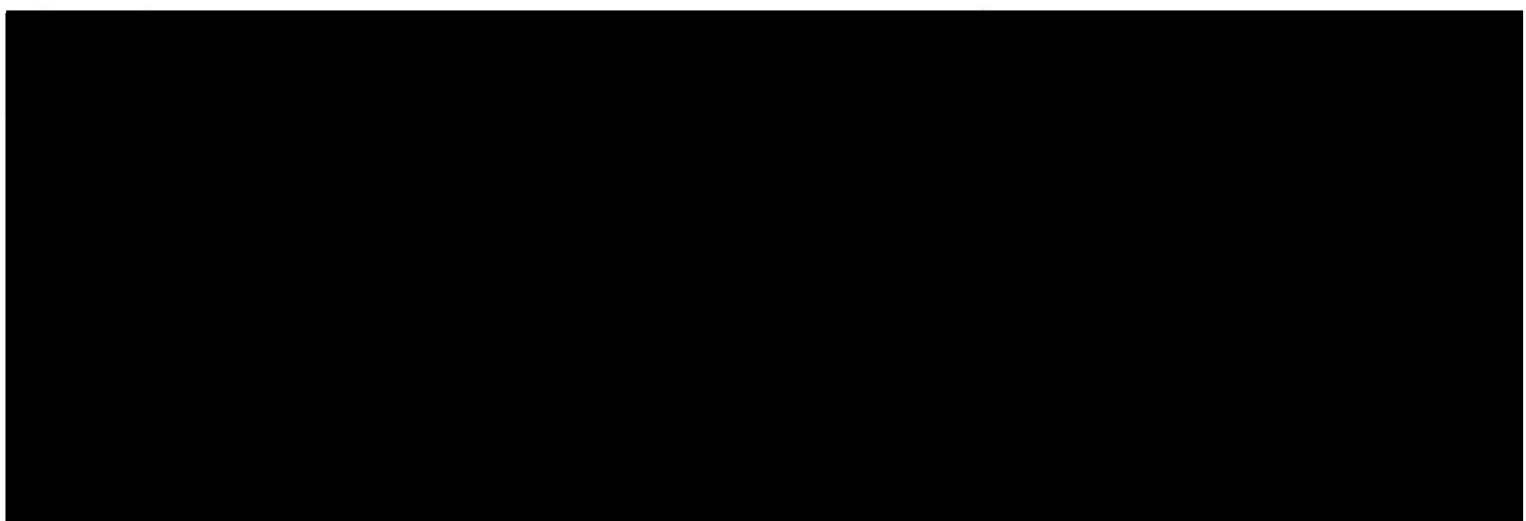
OFFICE VISIT E/M-History & Exam

0 = Pos., ✓ = Neg.





**SOCIAL HISTORY:** Per his insurance, he will be required to work three days / month to maintain eligibility for health insurance and disability benefits. Wife is getting ready to go onto FML when he goes onto surgery. He has not had a chance to contact Eric Vallieres (now moved to Swedish Oncology ).

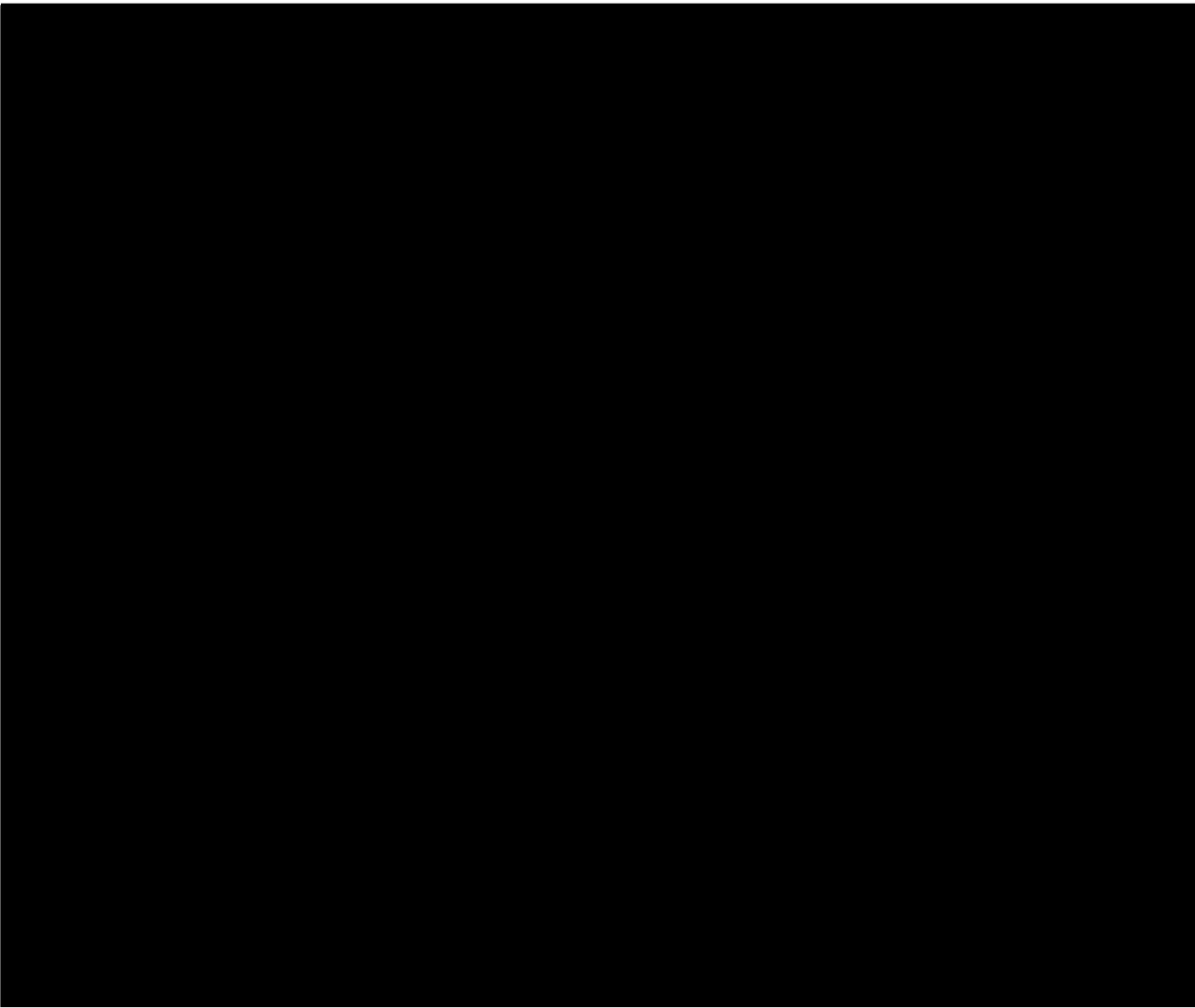


**PATIENT DIAGNOSTIC REPORT**

*Verified*

**PATIENT NAME : TREGGETT, ROBERT S**

MED REC#	BIRTHDATE	SEX	LOCATION	PHYSICIANS:
745925	██████44	M	DSU-11	████████████████████
SVC	PAT. TYPE	ADDENDUM #	ORDER #	
DIO	OP	0	1697666	
ORDER DATE	COMPLETE DATE			
1/30/04 10:38:00AM	1/30/04 11:06:29 AM			



DAVID E. DONG, M.D.  
1560 N 115TH STREET #G16

2LBL

Dictated by: EPHRON, JOHN  
Transcribed by: NOT APPLICABLE 02/04/2004 17:20  
Verified by: ██████████

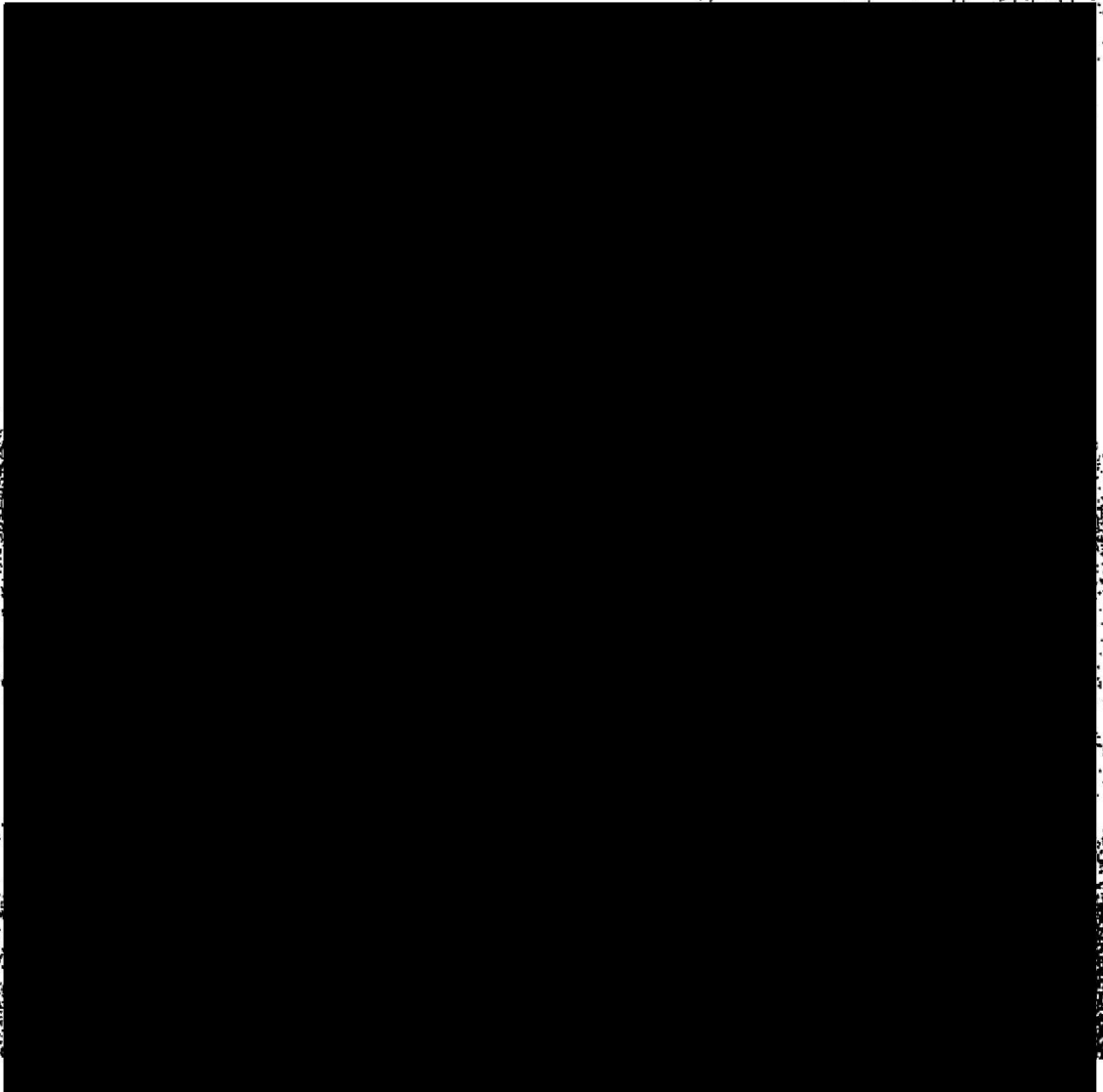
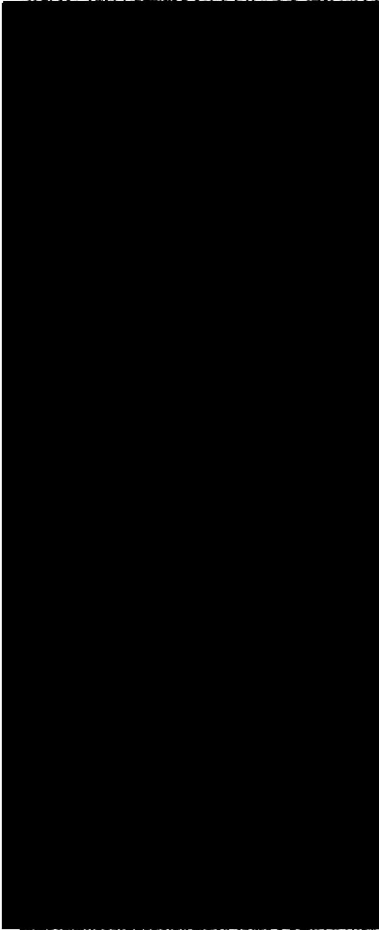


February 3, 2004



RE: Robert S. Treggett  
566-62-9333

Dear David:



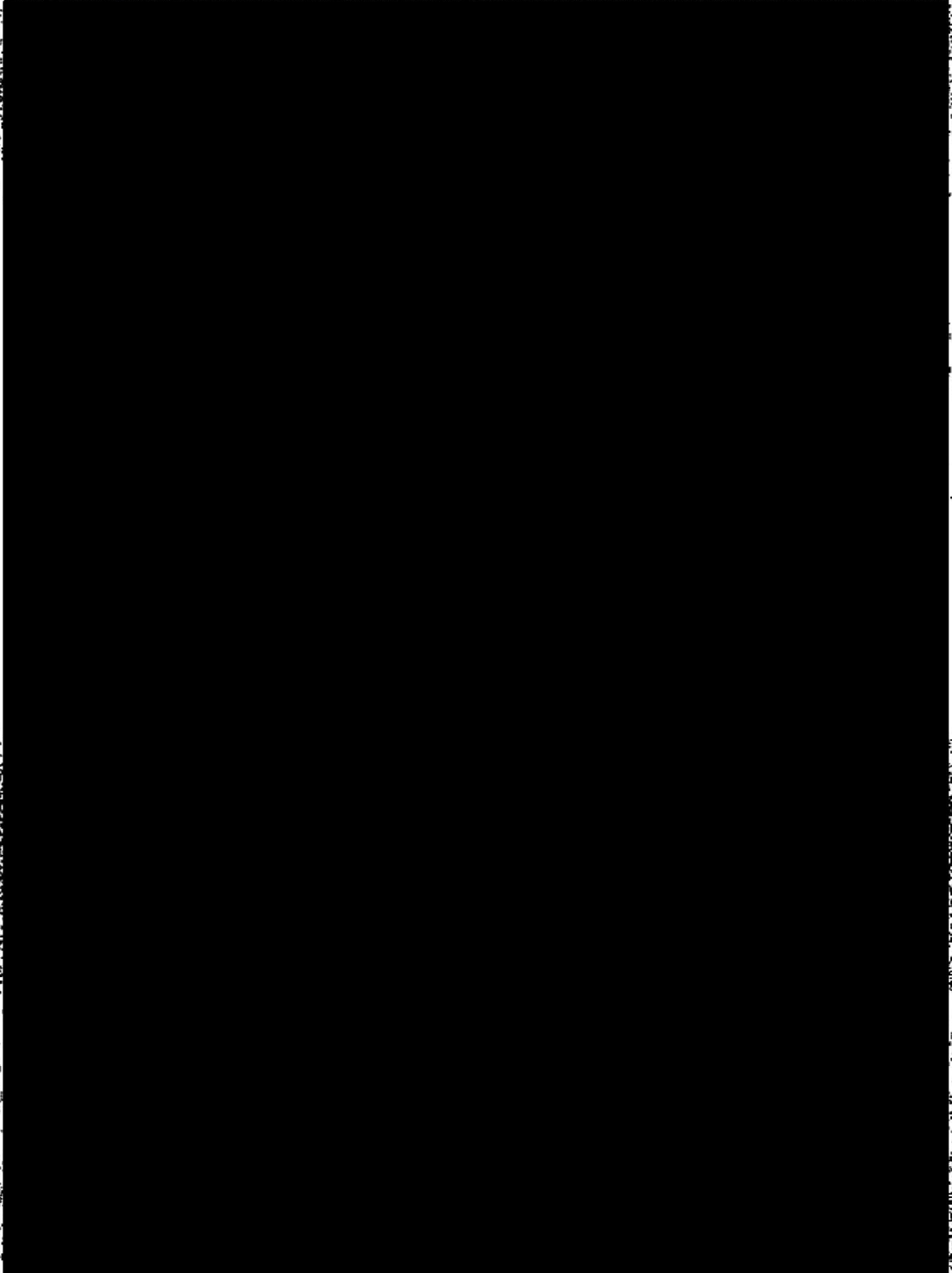
DIPLOMATE OF  
AMERICAN  
BOARD OF SURGERY



February 3, 2004

RE: Robert S. Treggett

Page Two



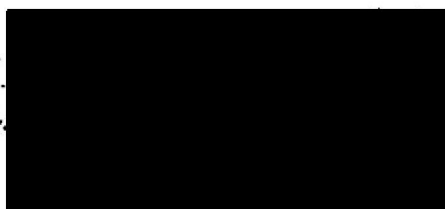


February 3, 2004

RE: Robert S. Treggett  
Page Three

cc:

692466



Alan C. MacDougal, M.D.  
David J. Cohen, M.D.  
Matthew P. Horan, M.D.  
Doris M. Kessler, M.D., Ph.D.  
Charles J. Kessler, M.D.

Carolyn L. Riches, M.D.  
Richard M. Kessler, M.D.  
David G. Kessler, M.D.  
Doris M. Kessler, M.D.  
Paul F. Kessler, M.D.

Elton S. Pizer, M.D., Ph.D.  
Jonathan S. Rabin, M.D.  
Steven W. Rabin, M.D.  
M. Scott Rabin, M.D.  
Sara D. Thomson, M.D.

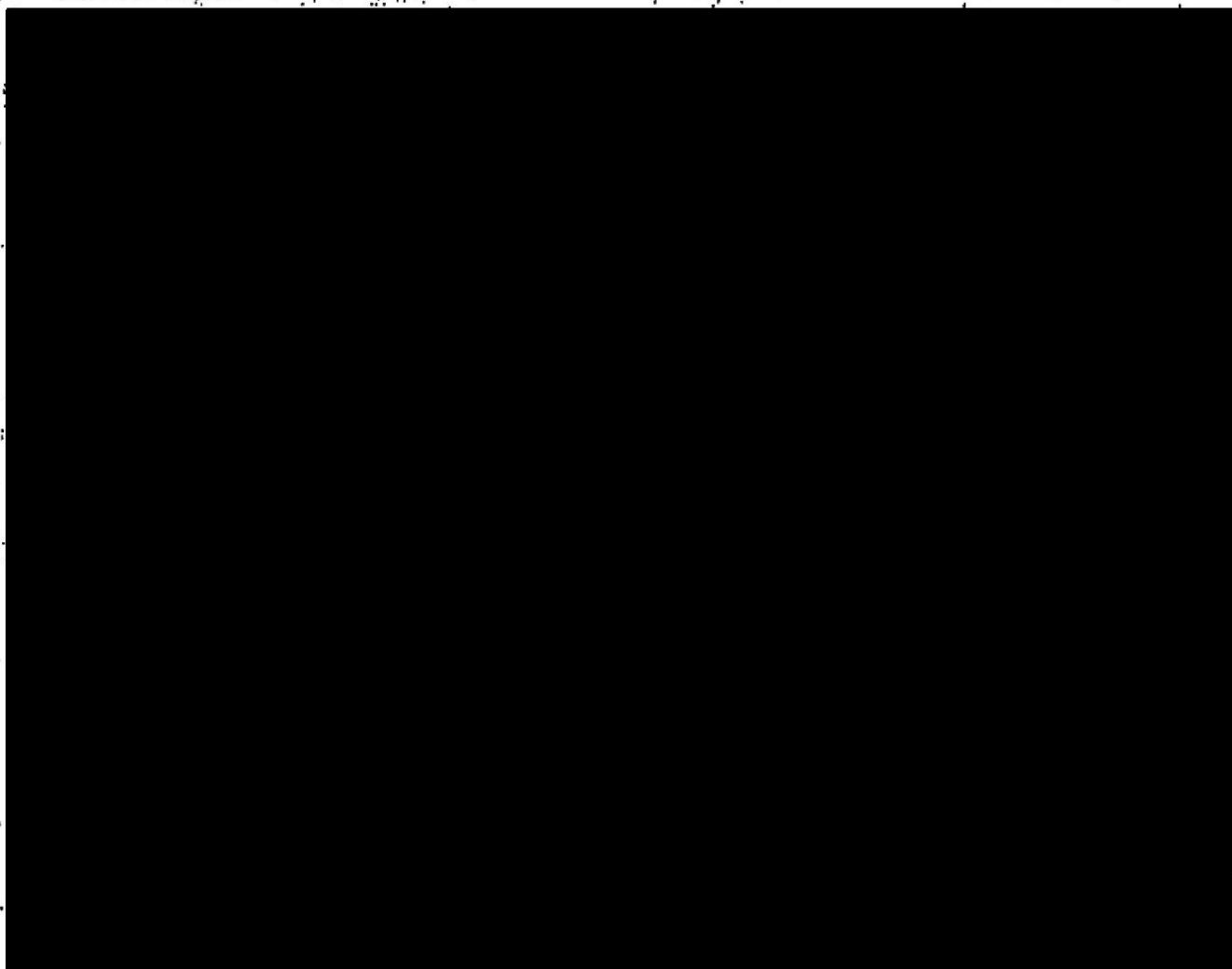
Ronald A. Tamm, M.D.  
Ray Wang, M.D., Ph.D.  
Dana S. Wolinsky, M.D.

**\* AMENDED \***  
**SURGICAL PATHOLOGY REPORT**

Collected: 2/23/04

Received: 2/23/04

Reported: 3/2/04



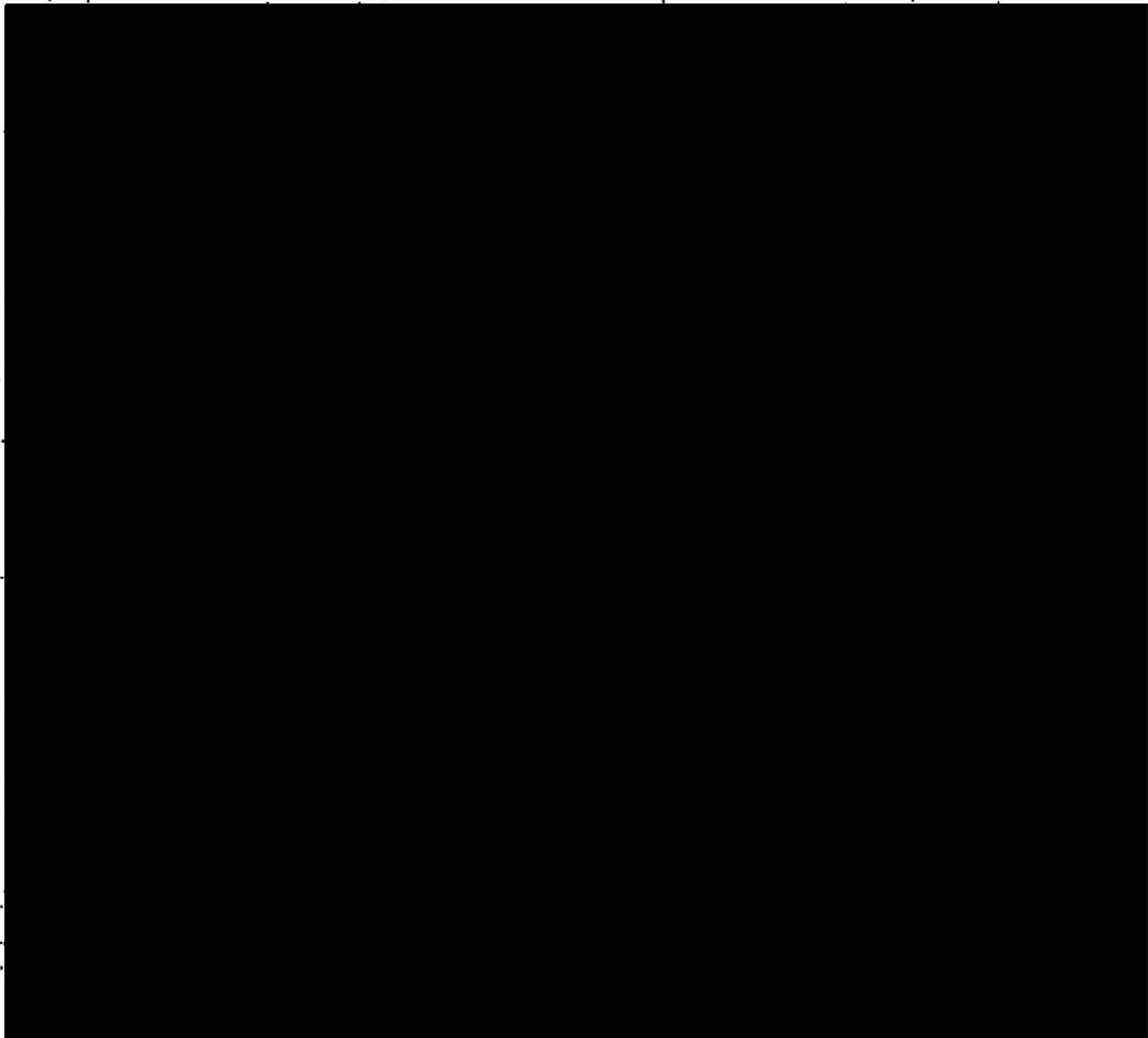
Accession: **A104-6129**  
Patient Name: **TREGGETT, ROBERT S.**  
Patient ID #: **48650333**  
DOB/Gender: **[REDACTED] (Age: 39) M**  
Location: **SMC 18, 301**  
Copy To: **None Given**  
Additional Copy To: **None Given**



Page 1 of 3  
Continued

\*Seattle Royal Don Markey Surgical





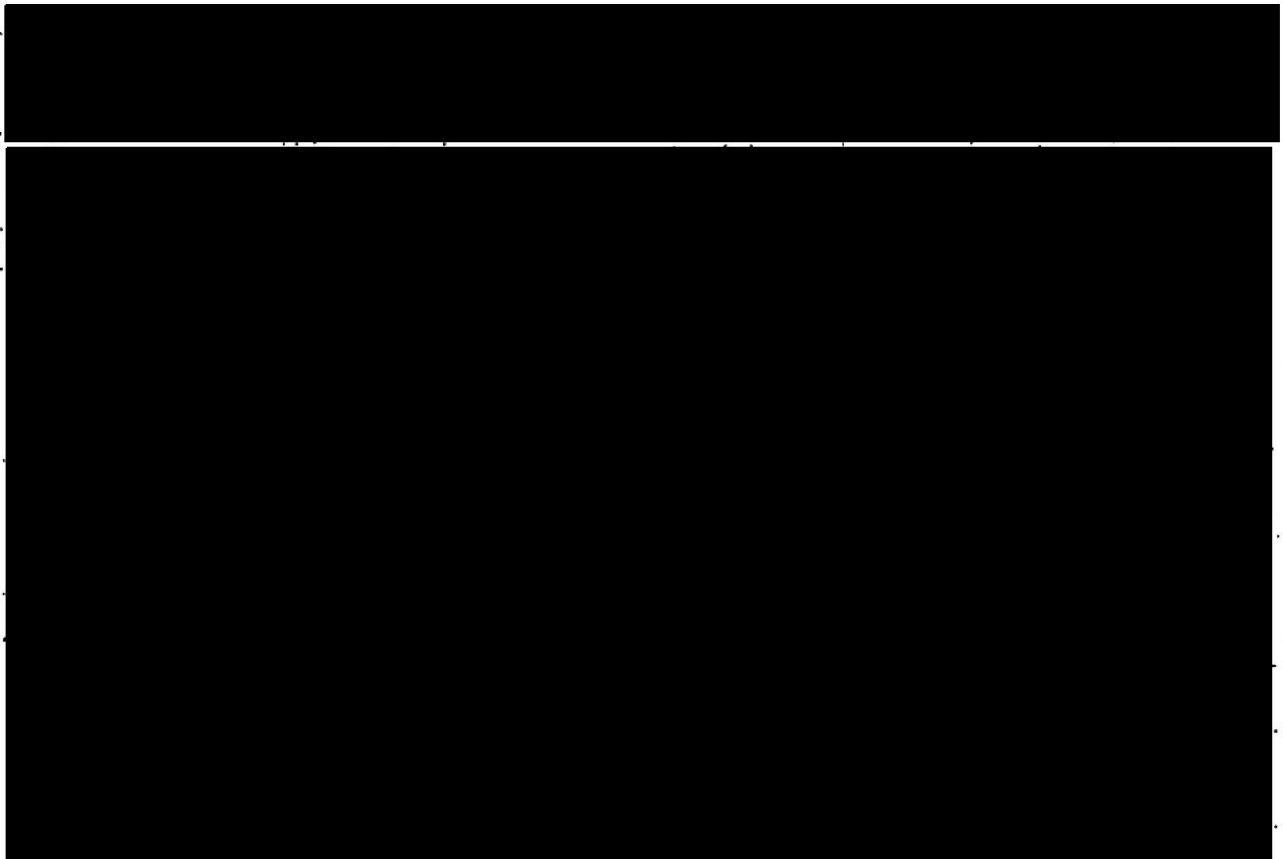
Accession: A904-4330  
 Patient Name: TREGGETT, ROBERT B.  
 Patient ID #: MR622433  
 DOB/Gender: [REDACTED] (Age: 59) M  
 Location: BMC 30, 001  
 Copy To: None Given  
 Additional Copy To: None Given



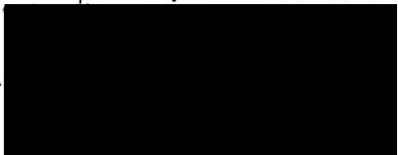
Page 2 of 3  
Continued

\*State Physician Registry Required

WATERS (2004)



Accession: ABC4-1330  
 Patient Name: TREGGETT, ROBERT S.  
 Patient ID #: 3682233  
 DOB/Gender: [REDACTED] (Age: 50); M  
 Location: SMC 30-303  
 Copy To: None Given  
 Additional Copy To: None Given



Page 3 of 3  
End of Report

\*State Physician Hospital License

F4460P (2/03)

CASE REPORT  
ATTACHMENT D – LIST OF REMAINING DEFENDANTS  
Robert Treggett, et al. v. Alfa Laval, Inc., et al.

ALFA LAVAL, INC.  
COLTEC INDUSTRIES INC.  
CRANE CO.  
EATON CORPORATION  
ENPRO INDUSTRIES, INC.  
GARLOCK SEALING TECHNOLOGIES, LLC  
GENERAL ELECTRIC COMPANY  
GENERAL MOTORS CORP.  
THE GORMAN-RUPP COMPANY  
HONEYWELL INTERNATIONAL, INC.  
IMO INDUSTRIES, INC.  
INGERSOLL-RAND COMPANY  
KELLY-MOORE PAINT COMPANY, INC.  
METROPOLITAN LIFE INSURANCE COMPANY  
NITRAM ENERGY, INC.  
PHILIPS ELECTRONICS NORTH AMERICA CORP.  
STERLING FLUID SYSTEMS (USA), INC.  
T H AGRICULTURE & NUTRITION LLC  
UNIROYAL HOLDING, INC.  
VIACOM INC.  
VIKING PUMP INC.  
YARWAY CORPORATION

CASE REPORT  
ATTACHMENT E – SETTLEMENT DEMANDS

Robert Treggett, et al. v. Alfa Laval, Inc., et al.

<u>Defendant</u>	<u>Settlement Demand</u>
ALFA LAVAL, INC.	\$750,000.00
COLTEC INDUSTRIES INC.	\$750,000.00
CRANE CO.	\$750,000.00
EATON CORPORATION	\$750,000.00
ENPRO INDUSTRIES, INC.	\$1,000,000.00
GARLOCK SEALING TECHNOLOGIES, LLC	\$750,000.00
GENERAL ELECTRIC COMPANY	\$1,000,000.00
GENERAL MOTORS CORP.	\$1,000,000.00
THE GORMAN-RUPP COMPANY	\$750,000.00
HONEYWELL INTERNATIONAL, INC.	\$1,000,000.00
IMO INDUSTRIES, INC.	\$2,000,000.00
INGERSOLL-RAND COMPANY	\$750,000.00
KELLY-MOORE PAINT COMPANY, INC.	\$2,000,000.00
METROPOLITAN LIFE INSURANCE COMPANY	\$100,000.00
NITRAM ENERGY, INC.	\$1,000,000.00
PHILIPS ELECTRONICS NORTH AMERICA CORP.	\$1,500,000.00
STERLING FLUID SYSTEMS (USA), INC.	\$750,000.00
T H AGRICULTURE & NUTRITION LLC	\$1,500,000.00
UNIROYAL HOLDING, INC.	\$1,500,000.00
VIACOM INC.	\$3,000,000.00
VIKING PUMP INC.	\$750,000.00
YARWAY CORPORATION	\$750,000.00

**WATERS & KRAUS, LLP**

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PETER A. KRAUS\*\*  
CHARLES S. SIEGEL

B. Scott Kruka  
Rhonda Sullivan Clowes  
Ashley Wainio McDowell  
Ron C. Madras  
Leslie C. MacLean  
†† George C. Tankard, III  
Dana Clavell Fox  
Michelle B. Norton  
Naida Talonenas  
‡‡ Paul C. Cook  
Melissa C. Katz  
\*Charles E. Valian  
Greg W. Lisenby  
Janna Robinson

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Law by the Texas Board of Legal  
Specialization and certified in Civil Trial  
Law by the National Board of Trial  
Advocacy

PLEASE RESPOND TO THE CALIFORNIA OFFICE

**FAX COVER SHEET**

TO: All Counsel of Record  
FROM: Claire Bothwell  
RE: Treggott Case Report  
DATE: May 6, 2004

Number of Pages to Follow: 20

MESSAGE:

Group Send Report

Page : 001  
Date & Time: May-06-04 11:12  
Line 1 : 562  
Line 2 :  
Machine ID : Waters & Kraus, LLP

Job number : 961  
Date : May-06 10:23  
Number of pages : 021  
Start time : May-06 10:23  
End time : May-06 11:12

Successful nbrs.

Groups

0008	Treggett	S.D.	029	014	079	018	008	009	060	052
			048	033	120	130	137	143	144	145
			146							

Unsuccessful nbrs.

Pages sent



PROOF OF SERVICE

STATE OF CALIFORNIA        )  
  )  
COUNTY OF LOS ANGELES    )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 200 Oceangate, Suite 520, Long Beach, California 90802.

On May 6, 2004, between 10:23 and 11:12 by use of (562) 590-7296, I served a copy of the following documents: **PLAINTIFFS' CASE REPORT** on interested parties in Case No. BC 307 058 by transmitting by facsimile machine to the following:

**SEE ATTACHED LIST**

The facsimile machine I used complied with California Rules of Court, rule 2003 and no error was reported by the machine. Pursuant to California Rules of Court, rule 2006(d), I caused the machine to print a transmission record of the transmission, a copy of which can be provided if requested.

(By Mail) I caused each envelope with postage fully prepaid, to be placed in the United States Mail at Long Beach, California to:

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this affidavit.

Executed on May 6, 2004, at Long Beach, California.

  
\_\_\_\_\_  
CLAIRE M. BOTHWELL

**TREGGETT SERVICE LIST**  
**LASC CASE NO. BC 307 058 – OUR FILE NO. 03-0951**

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**GARLOCK SEALING TECHNOLOGIES, LLC**  
**[ENPRO INDUSTRIES, INC.]**

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**VIAD CORP**

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**UNIROYAL HOLDING, INC.**

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213-533-5400      213-533-5444  
Speed Dial 18

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Henry D. Rome, Esq.  
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650-365-7715      650-364-5297  
Speed Dial 8

**INGERSOLL-RAND COMPANY**  
**STERLING FLUID SYSTEMS (USA), LLC.**

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**NITRAM ENERGY, INC.**

Leslie Mark Greenbaum, Esq.  
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Buffalo, New York 14203-1787  
716-854-4300      716-854-2787  
Speed Dial 145

**METROPOLITAN LIFE INSURANCE  
COMPANY**

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Joon M. Khang, Esq.  
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**PHILIPS ELECTRONICS NORTH AMERICA  
CORPORATION**

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Los Angeles, California 90071-1503  
(213) 229-9500      (213) 625-0248  
Speed Dial 141

**T H AGRICULTURE & NUTRITION, LLC**

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213-688-1000      213-243-6330  
Speed Dial 52

**VIACOM INC.**

Frank D. Pond, Esq.  
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213-236-2883      213-623-3594  
Speed Dial 146

**VIKING PUMP INC.**

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Gregory Kim, Esq.  
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Los Angeles, California 90025  
310-445-0800      310-473-2525  
Speed Dial 137