

Exhibit 37

CASE NAME AND CASE NUMBER:

MDL 1553; In Re Silica Products Liability Litigation

This document applies to: *Maxine Woods, et. al. v. Pulmosan Safety Equipment Company, et al.*

MDL number 04-025

**SILICA MDL
PLAINTIFF'S SUPPLEMENTAL SWORN FACT SHEET**

Name: Gordon Travis

Street Address: 15546 Parkwood Drive South

City: Gulfport State: Mississippi ZIP: 39503

Date of Birth: 04/01/57 Date of Death (if applicable): Not-applicable.

Work History - See attached Exhibit A - Work History

Product Identification - See attached Exhibit A - Work History.

I am making a claim for the following injuries (diseases):

Silicosis: Yes

Known Complicating Diseases:

Lung Cancer	_____	Rheumatoid Arthritis	_____
Scleroderma	_____	Pulmonary Massive Fibrosis	_____
Lupus	_____	Tuberculosis (TB)	_____
Kidney Cancer	_____	Enlarged Heart	_____
Fear of Cancer:	_____	Other:	_____

My medical providers are on the attached Exhibit B or will be provided in a supplemental disclosure. Copies of my B-read and diagnosis report are attached hereto as Exhibit C.

II. Authorizations

I have signed and attached the following authorizations:

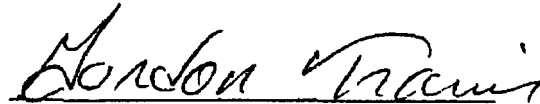
I. Medical Authorization

2. Social Security Earnings History Authorization
3. Employment Authorization
4. IRS Authorization (if I am making a claim for lost wages)
5. Veterans Administration Authorization

III. Claims

At this time, I am making the claims stated in Exhibit D.

I declare under penalty of perjury subject to 28 U.S.C. S 1746 that all of the information provided in this Fact Sheet is true and correct to the best of my present memory, knowledge, information and belief, that I have completed the List of Medical Providers and Work History appended hereto (or in a supplement), which are true and correct to the best of my knowledge, information and belief, and that I have provided the authorizations stated in Section II above. I reserve the right to modify or supplement the foregoing information during the discovery process of my case.

A handwritten signature in cursive script that reads "Gordon Travis". The signature is written in black ink and is positioned above a solid horizontal line.

Gordon Travis

Exhibit A

Exposure Work History
(Also list any other activity for which you claim silica exposure)

Employer and Exposure Site	Address	Dates of Exposure	Job Description	Types of Products (List all manufactures or models you remember)
See Attached	See Attached	See Attached	See Attached	See Attached

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: H Gordon Myrick Inc.

Beg Date: 1/1/1988 End Date: 12/31/1988

*Present? 0

Presently Employed - "0"=no "1"=yes

Contracted to:

Address: 3207 D Ave, Gulfport, MS 39507

Title/Trade: Laborer

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
- Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
- Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
- Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
- Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
- Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
- Shakeout Equip Sheetrock Silica Flour
- Other Products _____

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: H Gordon Myrick Inc.

Beg Date: 1/1/1984 End Date: 12/31/1985

*Present? 0

Presently Employed - "0"=no "1"=yes

Contracted to:

Address: 3207 D Ave, Gulfport, MS 39507

Title/Trade: Laborer

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
 - Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
 - Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
 - Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
 - Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
 - Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
 - Shakeout Equip Sheetrock Silica Flour
 - Other Products _____
-
-

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: Centex Simpson Construction Company

Beg Date: 1/1/1981 End Date: 12/31/1983

*Present? 0
Presently Employed - "0"=no "1"=yes

Contracted to:

Address: PO Box 427, Merrifield, VA 22116

Title/Trade: Sandblaster

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
- Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
- Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
- Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
- Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
- Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
- Shakeout Equip Sheetrock Silica Flour
- Other Products _____

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: JE Merit Constructors Inc

Beg Date: 1/1/1986 End Date: 12/31/1986

*Present? 0
Presently Employed - "0"=no "1"=yes

Contracted to:

Address: PO Box 7084, Pasadena, CA 91109

Title/Trade: Laborer

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
 - Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
 - Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
 - Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
 - Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
 - Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
 - Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
 - Shakeout Equip Sheetrock Silica Flour
 - Other Products _____
-
-

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
 Activity: _____ Year of this activity: _____
 Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: Northrop Grumman Ship Systems, Inc.

Beg Date: 1/1/1990 End Date: 12/31/1996

*Present? 0

Presently Employed - "0"=no "1"=yes

Contracted to:

Address: PO Box 149, Pascagoula, MS 39568

Title/Trade: Laborer

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
 Blast Equip Brick-Cutter Bulk Sand Cartridge Respirator
 Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
 Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
 Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
 Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
 Shakeout Equip Sheetrock Silica Flour
 Other Products _____
-
-

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: Gervais Favrot Co. Inc.

Beg Date: 1/1/1982 End Date: 12/31/1987

*Present? 0
Presently Employed - "0"=no "1"=yes

Contracted to:

Address: Box 19905 , New Orleans, LA 70179

Title/Trade: Construction

Additional Duties: Demolition Crew / Hospital over 50 years old

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
- Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
- Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
- Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
- Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
- Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
- Shakeout Equip Sheetrock Silica Flour
- Other Products _____

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exposure Work History

Client: Gordon Travis

Employer and Exposure Site: Hermitage Contractors Inc.

Beg Date: 1/1/1983 End Date: 12/31/1984

*Present? 0
Presently Employed - "0"=no "1"=yes

Contracted to:

Address:

Title/Trade: Laborer

Additional Duties:

Types of Products (check all manufactures or models you remember using at this job)

- Air Fed Hood Air Sweeping Equip Bag Sand Bag/Baghouses
- Blast Equip Brick Cutter Bulk Sand Cartridge Respirator
- Ceramic Equip Compressors, Hoses, Nozzles Cutting Saws, Cutting Equip
- Disposable Dust Masks Drills, Drill Bits Jack Hammer Grinders, Grinding
Wheels, Grinding Pads Mining Equip Masonry Tile, Brick, Mortar
- Non-Air Fed Hoods Pots Paint Products, Fillers Quarry Equip
- Sandpaper Refractory Products & Brick Rock Drilling Equip Sanders
- Shakeout Equip Sheetrock Silica Flour
- Other Products _____

List other activity for which you claim silica exposure

Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____
Activity: _____ Year of this activity: _____

Exhibit B

Medical Providers and Diagnosing Physicians

Please list the Diagnosing Physician, if any, and medical providers that you can remember seeing during the last 20 years. If you know, please provide the address, city, state and dates of treatment. Also, if you remember having a chest x-ray, please check the Chest x-ray box.

Doctor or other Health care provider	Address	Diagnosis	Date of Diagnosis or Treatment	Chest X-Ray
Dr. Winter	Gulport, MS	Back Pain		
Dr. Schabli	Gulport, MS	Headaches		
Dr. Longnecker	Biloxi, MS	Rotor Cup		

Exhibit C

Medical Testing

Please list the medical testing, if any. X-rays, other xerographs and PFT results, in Plaintiffs' custody or control are to be produced. Except documents that are subject to a claim of consulting expert privilege.

Type of testing	Date of Testing
X-ray	1/18/2002
PFT	12/12/2003
PFT	



James W. Ballard, M.D.

NIOSH Certified B-Reader

4012 Graystone Drive ● Birmingham, AL 35242
P.O. Box 381088 ● Birmingham, AL 35238

X-RAY EVALUATION

February 23, 2002

Law Office of Jim Zadeh, P.C.
115 W. 2nd St., Suite 201
Ft. Worth, TX 76102

Re: Travis, Gordon

Chest radiograph(s) of the chest dated 01/18/02 is reviewed for the presence of and classification of pneumoconiosis according to the ILO 80 classification.

Film quality is grade 1. Inspection of lung parenchyma demonstrates interstitial changes in all six lung zones, consisting of small rounded and irregular opacities of size and shape q/t, profusion 1/0.

There are no pleural plaques, pleural thickenings or pleural calcifications. No parenchymal infiltrates, nodules or masses are seen. The heart is of normal size and the mediastinal structures are unremarkable.

CONCLUSION: The above parenchymal changes are consistent with silicosis provided the subject's exposure history and period of latency are appropriate.

James W. Ballard, M.D.

022302.zad(acb/b)

MDL 1553
WOODS-001187

Travis, Gordon

WORKER'S Social Security Number

TYPE OF READING

FACILITY IDENTIFICATION

A P

1A. DATE OF X-RAY
MONTH DAY YEAR
01 18 02

1B. FILM QUALITY If not Grade 1 Give Reason:
1 2 3 U/R
2 3 U/R

1C. IS FILM COMPLETELY NEGATIVE?
YES Proceed to Section 5
NO Proceed to Section 2

2A. ANY PARENCHYMAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?
YES COMPLETE 2B and 2C
NO Proceed to Section 3

2B. SMALL OPACITIES
a. SHAPE / SIZE
PRIMARY SECONDARY
p s p s
q t q t
r u r u
b. ZONES
c. PROFUSION
0/ 00 0/1
1/ 1/1 1/2
2/1 2/2 2/3
3/2 3/3 3/+

2C. LARGE OPACITIES
SIZE A B C
Proceed to Section 3

3A. ANY PLEURAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?
YES COMPLETE 3B, 3C and 3D
NO Proceed to Section 4

3B. PLEURAL THICKENING
a. DIAPHRAGM (pleque)
SITE O R L
b. COSTOPHRENIC ANGLE
SITE O R L

3C. PLEURAL THICKENING... Chest Wall
a. CIRCUMSCRIBED (pleque)
SITE O R O L
IN PROFILE I. WIDTH O A B C O A B C
FACE ON I. EXTENT 0 1 2 3 0 1 2 3
II. EXTENT 0 1 2 3 0 1 2 3

b. DIFFUSE
SITE O R O L
IN PROFILE I. WIDTH O A B C O A B C
FACE ON I. EXTENT 0 1 2 3 0 1 2 3
II. EXTENT 0 1 2 3 0 1 2 3

3D. PLEURAL CALCIFICATION
SITE O R EXTENT
a. DIAPHRAGM 0 1 2 3
b. WALL 0 1 2 3
c. OTHER SITES 0 1 2 3

Site O L EXTENT
a. DIAPHRAGM 0 1 2 3
b. WALL 0 1 2 3
c. OTHER SITES 0 1 2 3
Proceed to Section 4

4A. ANY OTHER ABNORMALITIES?
YES COMPLETE 4B and 4C
NO Proceed to Section 5

4B. OTHER SYMBOLS (OBLIGATORY)
O ax bu ca cn co cp cv ct ef em es fr Hl ho kd in kl pl px rp tb
(SPECIFY od.)
Report items which may be of present clinical significance in this section.
OD _____ Date Personal Physician notified? MONTH DAY YR

4C. OTHER COMMENTS

SHOULD WORKER SEE PERSONEL PHYSICIAN BECAUSE OF COMMENTS IN SECTION 4C. YES NO Proceed to Section 5

5. FILM READER'S INITIALS JW B
PHYSICIAN'S SOCIAL SECURITY NUMBER*
DATE OF READING MONTH DAY YR 02 23 02

Complete if social security number is not furnished:
NAME (LAST-FIRST-MIDDLE)
STREET ADDRESS CITY STATE ZIP CODE

*Furnishing your social security number is voluntary. Your refusal to provide this number will not affect your right to participate in this program.

Woods

RAY A. HARRON, M.D.
Diplomate American Board of Radiology
Diplomate American Board of Nuclear Medicine

2437 Bay Area Blvd. #47
Houston, TX 77058
(409) 933-1264

7 North Flamingo
La Marque, TX 77568
(409) 789-1319

RE: Gordon Travis

DOB: 04/01/57

I certify that on 12/12/03, I examined the above client in Pascagoula, MS, and reviewed a reading of the chest x-ray dated 01/18/02.

The work history provided to me indicates that Mr. Travis had an occupational exposure to silica from 1973 to 2002, while working at various locations. My physical exam reveals there is no clubbing or cyanosis of the fingers. There is no ankle edema. There are no abnormal breath sounds. The client denies having cancer. The client denies having tuberculosis. The client denies having connective tissue disease. This individual reports smoking one-half pack of cigarettes per day for three years, and quit in 1993. The reading of the chest x-ray reveals bilateral interstitial fibrosis consistent with silicosis.

On the basis of this individual's history of occupational exposure to silica and the reading of his chest x-ray by Dr. Ballard, within a reasonable degree of medical certainty, Gordon Travis has silicosis.

Since silica exposure is associated with an increased incident of cor pulmonale, progressive pulmonary fibrosis, spontaneous pneumothorax, autoimmune connective tissue disease such as scleroderma, rheumatoid arthritis, systemic lupus erythematosus and others, tuberculosis, renal complications and lung cancer, this person should be examined frequently by a physician for possible early detection and treatment of these processes.

Pulmonary Function: See attached.



Ray A. Harron, M.D.

RAH/akm



Name: TRAVIS, GORDON

Pulmonary Function Analysis

Date: 12/12/03

Technician: TSELLERS, CRT

Age: 46

Height(in): 71

Weight(lb): 204

Gender: Male

Race: Black



Spirometry

		Ref	Pre Meas	Pre % Ref	Post Meas	Post % Ref	Post % Chg
FVC	Liters	5.17	6.26	121			
FEV1	Liters	4.14	3.91	94			
FEV1/FVC	%	80	62				
FEF25-75%	L/sec	4.06	0.40	10			
FEF50%	L/sec		3.81				
PEF	L/sec		8.86				
PIF	L/sec		1.50				
FVL ECode			101010				



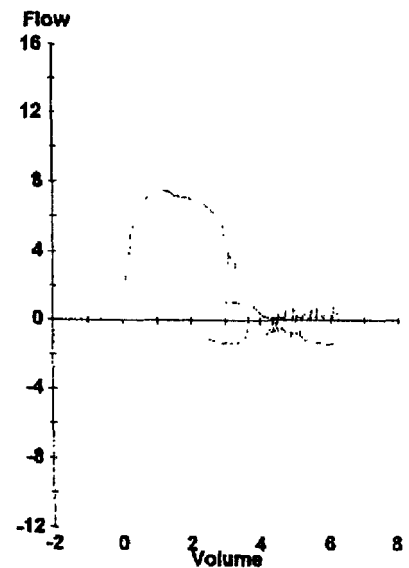
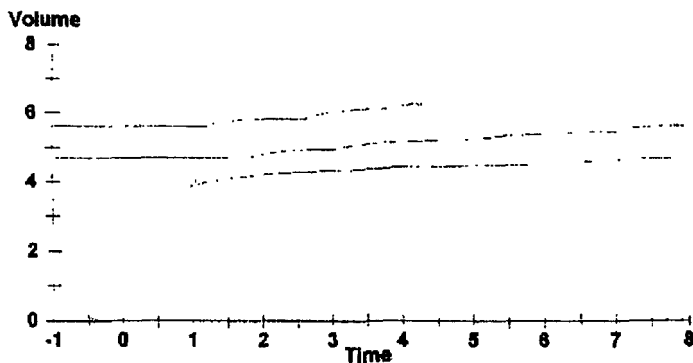
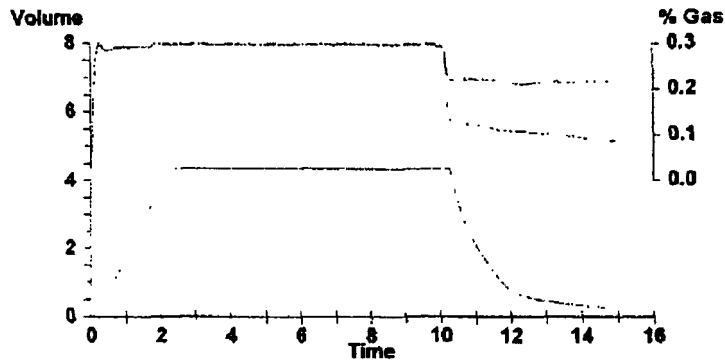
Lung Volumes

TLC	Liters	7.12	8.29	116			
RV	Liters	2.00	2.03	101			
RV/TLC	%	28	24				
FRC N2	Liters	3.62	3.04	84			
VC	Liters	5.17	6.26	121			
LVol ECode			000000				



Diffusion

				Hb:
DLCO	mL/mmHg/min	38.5	26.6	69
DLCONA	mL/mHg/min/L	5.52	4.46	81
BHT	Sec		9.83	
IVC	Liters		4.51	
DLCO ECode			0010	

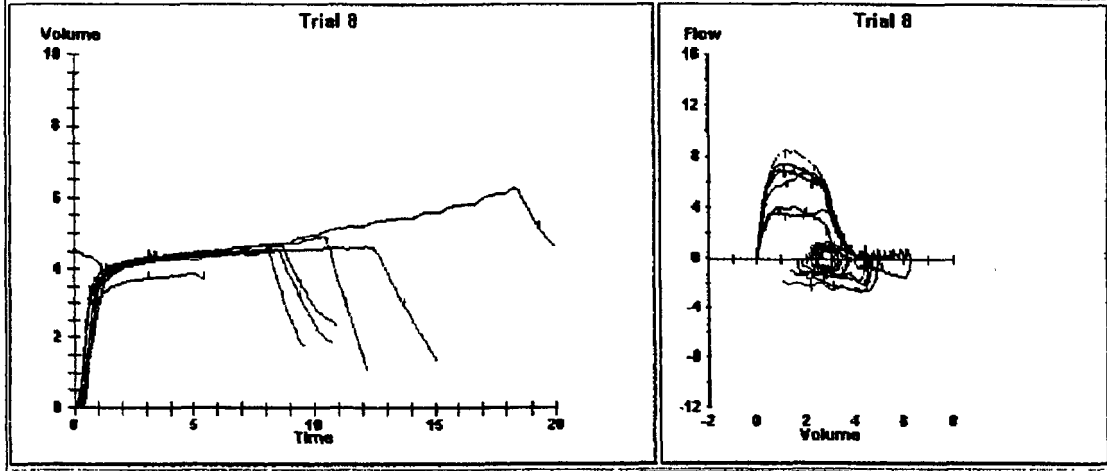


Date: 12/12/03

Pre

Flow Volume Loop — TRAVIS, GORDON -

	Ref	Best	% Ref	1	2	3	4	5	6	7	8
FVC	5.17	6.26	121	3.83	4.66	4.47	6.26	4.92	4.68	4.55	4.62
FEV1	4.14	3.91	94	3.20	3.53	3.84	3.91	3.75	3.90	3.80	3.82
FEV1/FVC	80	62		83	76	86	62	76	83	83	83
FET100%		18.25		5.10	8.50	6.77	18.25	10.33	7.66	8.40	12.16
PEF		8.66		4.08	3.83	7.07	7.54	6.81	8.66	7.04	7.56



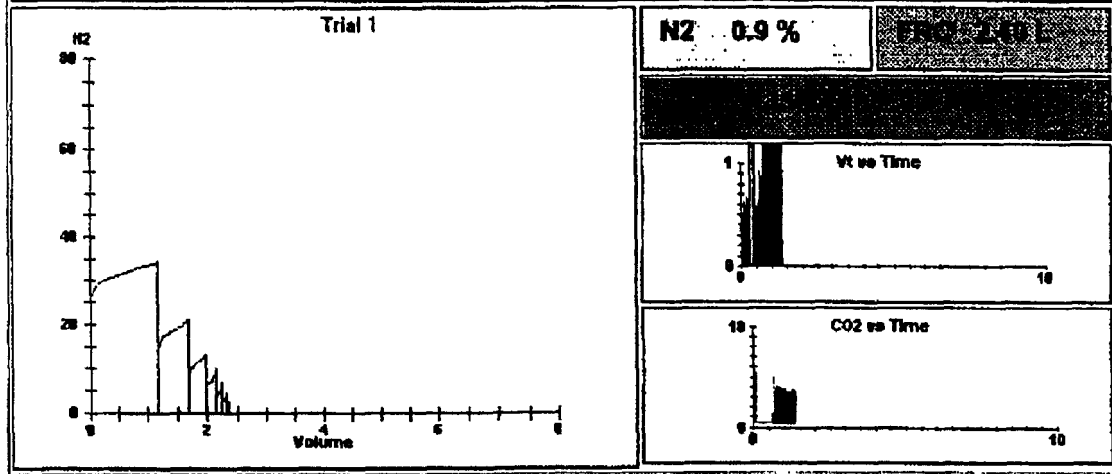
Best of eight trials.
 Amber Divine, Nisch

Date: 12/12/03

Pre

Lung Volumes — TRAVIS, GORDON -

	Ref	Best	% Ref	1
TLC	7.12	8.29	116	6.81
RV	2.00	2.03	101	2.03
RV/TLC	28	24		34
FRC N2	3.62	3.04	84	3.04
VC	5.17	6.26	121	3.98

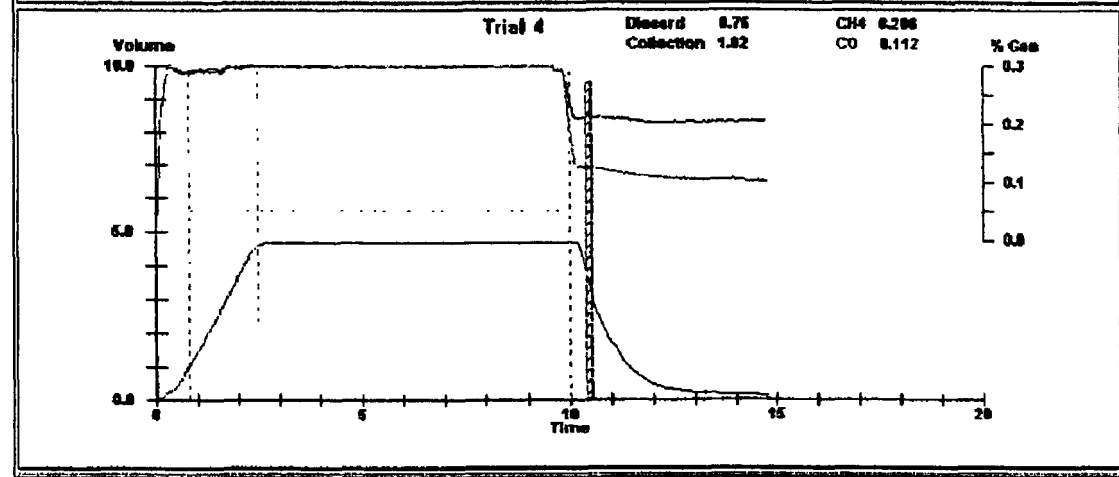


Date: 12/12/03

Pre

Single Breath DLCO — TRAVIS, GORDON -

	Ref	Best	% Ref	1	2	3	4
DLCO	38.5	26.6	69	26.4	25.1	26.9	28.1
DLCO/VA	5.52	4.46	81	4.62	4.42	4.46	4.35
BHT		9.83		9.91	9.95	9.77	9.70
IVC		4.51		4.33	4.41	4.65	4.66
DLCO ECode		0010		010	010	010	010



Rest of 4 trials. Ambler Divise, Wash

Exhibit D
Claims

I am making the following claims, at this time, against the following Defendants.

Defendants	Type of Claim
3M Corporation	Design defect, marketing defect, negligence and civil conspiracy
Air Liquide America Corporation	Design defect, marketing defect, negligence and civil conspiracy
American Optical	Design defect, marketing defect, negligence and civil conspiracy
American Sand & Gravel Company	Design defect, marketing defect, negligence and civil conspiracy
Baroid Drilling Fields, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Big Three Industries, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Binks Manufacturing Company	Design defect, marketing defect, negligence and civil conspiracy
Blain Sand & Gravel, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Blue Ridge Sand & Gravel, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Bowen Tools, Inc., Bowto, Inc. f/k/a Bowen Tools, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Briggs Weaver, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Bush Construction Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Clark Sales and Rentals, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Clark Sand Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Cooper Turbocomprsser	Design defect, marketing defect, negligence and civil conspiracy
Clemco Industries, Inc	Design defect, marketing defect, negligence and civil conspiracy
Custom Aggregates and Grinding, Inc.	Design defect, marketing defect, negligence and civil conspiracy
D&B Sand & Gravel Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
DFM Equipment Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Daloz Safety, Inc., f/k/a WGM Safety Corporation, d/b/a Wilson Safety Products	Design defect, marketing defect, negligence and civil conspiracy
Dependable Abrasives, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Devilbiss Air Power Co. f/k/a Devilbiss Corporation	Design defect, marketing defect, negligence and civil conspiracy
Eastern Safety Equipment Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
E.D. Bullard Company	Civil Conspiracy
Empire Abrasive Equipment Company	Design defect, marketing defect, negligence and civil conspiracy
Flexco Products, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Glendale Protective Technologies, inc.	Design defect, marketing defect, negligence and civil conspiracy
Green Brothers Gravel Company	Design defect, marketing defect, negligence and civil conspiracy
Gulf Coast Marine Supply	Design defect, marketing defect, negligence and civil conspiracy
Gulf States Supply Company	Design defect, marketing defect, negligence and civil conspiracy
Halliburton Energy Services, Inc. f/k/a Halliburton Company	Design defect, marketing defect, negligence and civil conspiracy
Hanson Aggregates Central, Inc	Design defect, marketing defect, negligence and civil conspiracy
Hertz Equipment Rental Corporation	Design defect, marketing defect, negligence and civil conspiracy
Huey Stocksill	Design defect, marketing defect, negligence and civil conspiracy
Humble Sand & Gravel, Inc.	Design defect, marketing defect, negligence and civil conspiracy

Exhibit D
Claims

Defendants	Type of Claim
Illinois Tool Works, Inc. Individually and as Successor By Merger of Ransburg Corporation (Formerly Devilbiss Industries Products Corporation, Successor to the Devilbiss Company)	Design defect, marketing defect, negligence and civil conspiracy
Inco Safety Products	Civil Conspiracy
Ingersoll-Rand Company	Design defect, marketing defect, negligence and civil conspiracy
JB Industries Sand	Design defect, marketing defect, negligence and civil conspiracy
JJ Ferguson Sand and Gravel	Design defect, marketing defect, negligence and civil conspiracy
JEBCO Abrasives, Inc.	Design defect, marketing defect, negligence and civil conspiracy
John Barten, Individually and d/b/a John Barten Company	Design defect, marketing defect, negligence and civil conspiracy
Kelco Sales Associates, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Kelco Sales & Engineering Company A Division of Polley, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Key Houston	Design defect, marketing defect, negligence and civil conspiracy
Laurel Machine & Foundry	Design defect, marketing defect, negligence and civil conspiracy
Lockheed Martin Corporation	Design defect, marketing defect, negligence and civil conspiracy
Lone Star Industries	Design defect, marketing defect, negligence and civil conspiracy
Louis M. Gerson Co., Inc.	Design defect, marketing defect, negligence and civil conspiracy
Lowry Sand & Gravel, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Martin Marietta Materials, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Mine Safety Appliances Company (MSA)	Design defect, marketing defect, negligence and civil conspiracy
Moklex-Metric, Inc.	Design defect, marketing defect, negligence and civil conspiracy
North Company f/k/a San Gobain Abrasives, Inc.	Design defect, marketing defect, negligence and civil conspiracy
North Safety Products, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Ogleby Norton Industrial Sands, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Ottawa Silica Company	Design defect, marketing defect, negligence and civil conspiracy
Pangborn Corporation	Design defect, marketing defect, negligence and civil conspiracy
Parmalee Industries d/b/a Chicago Eye Shield Company (CESCO)	Design defect, marketing defect, negligence and civil conspiracy
Pearl Sands, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Louisiana Partnership Pearl/James Joint Venture	Design defect, marketing defect, negligence and civil conspiracy
Pine Belt Ready-Mix Concrete, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Pine Creek Ready Mix Concrete, Inc.	Design defect, marketing defect, negligence and civil conspiracy
P. K. Lindsey Company	Design defect, marketing defect, negligence and civil conspiracy
Pir. Inc., d/b/a H.S. Cover Company	Design defect, marketing defect, negligence and civil conspiracy
Pulmosan Safety Equipment Corporation	Design defect, marketing defect, negligence and civil conspiracy
Quikrete Materials, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Rent All of Laurel County	Design defect, marketing defect, negligence and civil conspiracy
Rental Service Corporation	Design defect, marketing defect, negligence and civil conspiracy
Saint Gobain Abrasives	Design defect, marketing defect, negligence and civil conspiracy
Sanstorm, Inc. d/b/a Delaware Sanstrom, Inc.	Design defect, marketing defect, negligence and civil conspiracy

Exhibit D
Claims

Defendants	Type of Claim
Schmidt Manufacturing, Inc.	Civil Conspiracy
Schramm, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Scott Aviation, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Scott Technologies, Inc f/k/a Figgie International, Inc., Individually and on behalf of his	Design defect, marketing defect, negligence and civil conspiracy
Sherwin-Williams Company	Design defect, marketing defect, negligence and civil conspiracy
Siebe North, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Southern Silica Of Louisiana	Design defect, marketing defect, negligence and civil conspiracy
Specialty Sand Company	Design defect, marketing defect, negligence and civil conspiracy
Specialty Sand Company	Design defect, marketing defect, negligence and civil conspiracy
Sullair Corporation	Design defect, marketing defect, negligence and civil conspiracy
Survuvair, Inc.	Design defect, marketing defect, negligence and civil conspiracy
T. L. James and Company, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Textron, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Truman's Inc.	Design defect, marketing defect, negligence and civil conspiracy
Unimin Corporation Individually and on behalf of its division Unimen Specialty Materials Inc.	Design defect, marketing defect, negligence and civil conspiracy
U.S. Silica Company f/k/a Pennsylvania Glass Sand Corporation and Ottawa Silica Company and as Successor In Interest to Texas Industries Minerals Company	Design defect, marketing defect, negligence and civil conspiracy
Vallen Corporation	Design defect, marketing defect, negligence and civil conspiracy
Vulcan Materials Company	Design defect, marketing defect, negligence and civil conspiracy
W J Runyon & Son, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Wedron Silica Company	Design defect, marketing defect, negligence and civil conspiracy
Wheeler-Frye, Inc.	Design defect, marketing defect, negligence and civil conspiracy
Wheeler Protective Apparel, Inc.	Design defect, marketing defect, negligence and civil conspiracy