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**ATTORNEYS FOR INTERNATIONAL PAPER COMPANY**

IN THE SUPREME COURT OF THE STATE OF MONTANA

<p>IN RE ASBESTOS LITIGATION,</p> <p><i>Consolidated Cases.</i></p>	<p>Cause No. AC 17-0694</p> <p>RULE 26 EXPERT DESIGNATION</p> <p>THIS DOCUMENT RELATES TO:</p> <p><i>Ward, et al. v. International Paper, et al.,        Cascade County Cause No. DV-10-839</i>        Judge Dan Wilson</p>
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**INTERNATIONAL PAPER COMPANY'S RULE 26 EXPERT WITNESS  
 DESIGNATION**

Defendant, International Paper Company ("IP" or "Defendant") submits this its Rule 26 Expert Witness Designation pursuant to the Montana Rules of Civil Procedure.

**I. EXPERT WITNESSES**

The following witnesses may be called, either live or by deposition testimony, to provide testimony.

IP designates any treating or diagnosing physician who treated Plaintiff or who has been identified by the Plaintiff or any other Defendant to the extent that testimony is admissible and

favorable to IP. It also designates any expert witness listed by any other party to the extent that testimony is admissible and favorable to IP.

IP designates any expert or physician listed by any other defendant who is expected to testify about the radiology of asbestos related disease, including any such expert who has reviewed x-rays or issued a report on the medical condition of the Plaintiff.

IP designates any pathologist who reviewed pathology slides in the ordinary course of medical treatment of the Plaintiff. IP further designates any expert or physician listed by any other Defendant who is expected to testify about the pathology of asbestos related disease, or pathological issues associated with the use of tobacco, including any such expert who has reviewed any pathological material or issued a report on the medical condition of the Plaintiff.

IP designates any expert listed by the Plaintiff or any other defendant who is expected to testify regarding corporate and scientific knowledge of asbestos including but not limited to mineralogy, epidemiology, exposure risk, state of the art, and environmental controls. Additionally, IP designates any expert listed by the Plaintiff or any other defendant who is expected to testify regarding W.R. Grace and its relationship with the use of asbestos including its control of the mine in Libby, Montana.

Additionally, IP designates the following expert witnesses:

1. DENNIS J. PAUSTENBACH, Phd, CIH, DABT  
235 E. Broadway  
Jackson, WY

Mr. Paustenbach is a board-certified toxicologist and industrial hygienist with nearly 30 years of experience in risk assessment, environmental engineering, ecotoxicology, and occupational health. He is the President of Cardno Chemrisk, a division of Cardno that specializes in human and ecological risk assessment, risk analysis of chemical and radionuclides in consumer products, contaminated sites, pharmaceuticals, and medical devices. For a complete listing of Paustenbach's qualifications, please see the attached CV along with a listing of his previous testimony.

Mr. Paustenbach may testify regarding industrial hygiene relating to asbestos, including but not limited to use of asbestos-containing products on work sites and construction sites, and in homes. He may discuss assessment of the risk of exposure under various circumstances, including those described by Plaintiffs and other exposure witnesses in their depositions; the concept of fiber years; the evolution of knowledge (i.e. state-of-the-art) in the field of industrial hygiene regarding the identification, evaluation and control of asbestos hazards in a variety of settings. He may also testify about the evolution of knowledge regarding the effects of asbestos exposure and its control during the time period relevant to this case; public policy related to asbestos use and exposure; and the risk of disease for direct users, those who claim indirect exposure, such as so-called take home and/or community exposures. Mr. Paustenbach may explain how industrial hygienists establish a dose-relationship between asbestos exposure and disease; the importance of toxicity variants in different types of asbestos; the use of warnings in an industrial setting and how those warnings are developed; the warnings in products with regard to direct users, bystanders (those working around the products), and community, secondary/household exposures; the methodology of asbestos hazard analysis; the division of responsibilities and duties as between employers, employees, and product manufacturers with respect to asbestos hazards; the effect of environmental controls on exposure and dose; the industrial use of asbestos from 1900 to the present; whether mesothelioma, lung cancer, asbestosis, and/or any other alleged disease are asbestos-related diseases from the standpoint of the field of industrial hygiene; issues related to asbestos fiber-type including, but not limited to, physical and chemical structure, biopersistence, potential tremolite contamination issues, and the ability of various fiber types to cause disease, and how fiber type distinctions are important in industrial hygiene; the development and utility of various methodologies for the identification and measurement of asbestos in air, dust and products; the analysis and management of multiple industrial and consumer hazards; engineering controls and risk reductions regarding asbestos; general methods for quantifying airborne concentrations of particulate matter; the evolution of various standards for exposure to asbestos, including TLVs and the OSHA PELs and other aspects of government regulation of asbestos exposure. He may also discuss rules, regulations, processes and procedures related to asbestos abatement.

In addition, Mr. Paustenbach may testify to the community exposure to asbestos as alleged by Plaintiffs in the Libby, Montana area. Further, he may testify regarding the role of W.R. Grace in the contamination of the Libby, Montana area. His testimony may include analysis of the overall activities of the W.R. Grace operation in Libby, Montana to the extent that the activities or lack thereof caused the community of Libby to be exposed to dangerous levels of asbestos. He may testify how asbestos that was released into the environment by W.R. Grace increased the risk of disease to those persons including the plaintiffs.

Mr. Paustenbach may testify about testing done by or on behalf of Plaintiffs, including critique and analysis of the sampling methodologies and analysis, protocol and scientific basis for the tests, and the accuracy of the testing in reproducing field conditions. Mr. Paustenbach's testimony will be based on his training, experience, education, review of the relevant scientific literature, review of available asbestos bankruptcy trust documents, and a review of the various documents produced in discovery including any materials introduced as evidence or otherwise

disclosed in the particular case. Mr. Paustenbach may testify as to any expert support provided by the Plaintiffs.

At this time, discovery is ongoing, and essential information is lacking. The Defendant reserves the right to supplement this designation once additional discovery has been conducted. Defendant reserves its right to produce a complete report from Mr. Paustenbach should it prove necessary.

2. DR. DAVID WEILL  
Weill Consulting Group  
533 Audubon Street  
New Orleans, LA 70118

David Weill, MD is the Principal of the Weill Consulting Group, providing consultation in occupational lung diseases, advanced lung conditions, and organ transplantation and is board-certified in pulmonary disease and critical care medicine. He is the former Director of the Stanford Center for Advanced Lung Disease and Director of the Lung and Heart- Lung Transplant Program at Stanford. He has authored numerous publications on various aspects of lung disease including examining exposure, radiographic changes, and lung function in Libby, Montana. He previously testified in these proceedings on July 24, 2018. In addition, Dr. Weill has testified in the United States Senate on two occasions and in the Texas State Legislature regarding various aspects of asbestos related diseases. For a complete list of Dr. Weill's qualifications and testimony, please see the attached CV.

Dr. Weill is expected to testify either live or by deposition concerning Plaintiffs' medical conditions, cigarette smoking and lung disease, and generally about the pulmonary system and its functions as well as conditions and diseases of the pulmonary system. Dr. Weill may also testify about asbestos and its effect on the pulmonary system, including the diagnosis and prognosis of asbestos-related markers and diseases, the risks associated with developing cancers and the criteria required for attribution of causation of a cancer to previous asbestos exposure. If called, Dr. Weill is expected to testify about the pulmonary aspects of asbestos exposure, including matters such as dose response, pathogenicity, carcinogenicity, and the potential for asbestos-related disease as a result of exposures to the different types of fibers. If called, Dr. Weill is expected to testify as to general medical issues and physiology.

Dr. Weill is expected to testify about alleged exposure - as described by the Plaintiffs' witnesses - and whether such exposure could be considered a substantial contributing factor to the Plaintiffs' alleged diseases. If called, Dr. Weill may also testify about the principles of epidemiology and what is involved in an epidemiologic study.

Dr. Weill is also expected to testify about any matter raised by experts called by the Plaintiff or co-defendants including, but not limited to, Plaintiffs' medical conditions, the state of medical knowledge concerning asbestos, asbestos-related disease and other occupational diseases. Further and to the extent not already described herein, Dr. Weill may also testify to:

- a. the nature, cause and prognosis of Plaintiffs' medical conditions, if any, including but not limited to alleged asbestosis, pneumoconiosis, so-called lamellar pleural thickening, lung cancer, and mesothelioma;
- b. other alternative causes of Plaintiffs' medical conditions;
- c. opinion as to whether Plaintiffs' suffered from an asbestos-related disease and the basis of such opinion;
- d. medical conditions affecting the alleged disabilities and/or damages in issue in this case;
- e. the treatment of Plaintiffs' medical conditions, if any;
- f. criteria used to diagnose asbestos-related diseases;
- g. the relationship, if any, between Plaintiffs' medical condition and alleged exposure to asbestos;
- h. the effect of exposure to substances other than asbestos or the development and manifestation of obstructive and restrictive condition and diseases of the respiratory system;
- i. the methods of diagnosis and means of establishing the differential diagnosis of asbestos-related diseases with non-asbestos-related diseases;
- j. the incidence of lung cancer in the general population and those individuals exposed to asbestos;
- k. cigarette smoking and its effect on the lungs;
- l. the difference between impairment and disability;
- m. the effect of asbestosis or cancer on disability and life expectancy;
- n. the history and evolution of knowledge of asbestos-related diseases;
- o. the evolution of the medical community's awareness of the increased risks for an asbestos related disease in cases of prolonged exposure;
- p. their reports on these individuals, if any; and
- q. issues raised by Plaintiffs' expert witnesses whose opinions have not been revealed at this time and whose depositions have not been taken.

If called, Dr. Weill's opinions and testimony will be based upon his training, experience, education, publications, his review of the medical and scientific literature as well as his review of Plaintiff's medical records, chest x-rays and other imaging studies.

At this time, discovery is ongoing, and essential information is lacking. The Defendant reserves the right to supplement this designation once additional discovery has been conducted. Defendant reserves its right to produce a complete report from Dr. Weill should it prove necessary.

## **II. RESERVATIONS**

IP reserves the right to supplement or amend this disclosure to the extent that discovery has not been completed. Because discovery is ongoing, the need for additional expert testimony

may arise in order to rebut the facts and opinions to which the Plaintiffs' experts may testify. IP will supplement its disclosures in accordance to Rule 26 of the Montana Rules of Civil Procedure.

IP reserves the right to call expert witnesses who may be listed by co-defendants or the Plaintiff to the extent that testimony is admissible and favorable to IP. IP adopts the disclosure of all co-defendants to the extent that testimony is admissible and favorable to IP. IP also hereby reserves the right to call those expert witnesses listed by the Plaintiff.

IP further reserves the right to call as witnesses any individuals necessary to authenticate social security records, tax records, military records, union records, personnel records, sales/shipment/delivery records, or medical records.

Respectfully submitted this 26th day of September, 2018.

By: *//s// Jennifer M. Studebaker*

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