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Attorneys for KS Plaintiffs

IN THE ASBESTOS CLAIMS COURT OF THE STATE OF MONTANA  
Cause No. AC 17-0694

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IN RE ASBESTOS LITIGATION,  
  
*Consolidated Cases.*

THIS DOCUMENT RELATES TO:  
*Ward, et al. v. International Paper, et al.*  
*Cascade County Cause No. DV-10-839*  
*Judge Dan Wilson*

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**PLAINTIFFS' EXPERT WITNESS DISCLOSURE**

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COME NOW KS Plaintiffs, by and through counsel, and hereby submit their expert witness disclosure pursuant to this Court's Scheduling Order. Plaintiffs may call the following expert witnesses to testify at the trial of this matter:

1. Terry Spear, Ph.D.  
819 Empire St.  
Butte, MT 59701

Dr. Spear is a Professor Emeritus of industrial hygiene at Montana Tech of the University of Montana in Butte, Montana. Dr. Spear taught industrial hygiene

courses and served as the head of the Safety, Health and Industrial Hygiene Department at the university. He holds a Ph.D. in industrial hygiene.

Dr. Spear has extensive experience in the field of industrial hygiene as it pertains to asbestos, and specifically exposure pathways which existed at the St. Regis Mill in Libby, Montana. Dr. Spear also has knowledge concerning the insidious effects of asbestos on the human body, including the link between industrial asbestos exposure and asbestos related diseases, including lung cancer. Dr. Spear is expected to testify that materials were widely available to anyone interested in learning about the significant danger asbestos posed to workers, and that they were widely available in the 1940's and 1950's.

Dr. Spear has specific knowledge about the specific types of asbestos containing materials which existed at the mill, that the mill processed lumber contaminated by Libby amphibole asbestos, and the dangers these exposures to asbestos posed to mill workers, including decedent Eugene Ward. Based on industrial hygiene information, it is more probable than not that his exposure to asbestos while employed by St. Regis was a significant injurious exposure and was sufficient to cause his disease.

2. Alvin J. Schonfeld, D.O., F.A.C.O.I., F.C.C.P.  
Pulmonary Medicine  
Occupational Lung Disease  
Chicago, IL 60614-2750

Dr. Alvin Schonfeld is a board certified doctor of osteopathic medicine (D.O.) who specializes in the diagnosis and treatment of pulmonary diseases, with an emphasis on asbestos related diseases. Plaintiffs expect Dr. Schonfeld to testify consistent with his report concerning Plaintiff Lynda Hanley-Cole and her asbestos related disease. His report is attached as Exhibit "A."

3. Treating Physicians

Plaintiffs may also call certain treating healthcare providers to testify as lay and expert witnesses in this case. Plaintiffs' treating healthcare providers have not been expressly retained for the purposes of this litigation, but Plaintiffs anticipate each provider will testify in accordance with the facts and opinions expressed in his or her medical records. Copies of the medical records have been, and will continue to be, made available to Defendant in discovery.

Plaintiffs expect healthcare providers to testify concerning the nature of Plaintiffs' respective diseases, causation, medical treatment received as a result of those diseases, the cost of treatment, and any limitations Plaintiffs' diseases have or will cause Plaintiffs' respectively.

Plaintiffs may call the following treating physicians for the Estate of Eugene Ward:

A. Jeffrey Shulkin, M.D.; and,

B. Ram Lalchandani, M.D.

Plaintiffs may call the following treating physicians for Plaintiff Lynda Hanley-Cole:

A. Nanette Smith, M.D.;

B. Stephen B. Bartsch, M.D.; and,

C. Samuel G. Joseph, D.O.

Plaintiffs reserve the right to call other medical professionals who administered care to Plaintiffs consistent with their medical records, as well as any healthcare professional discovered at a later date.

DATED this 26<sup>th</sup> day of September, 2018.

KOVACICH SNIPES, P.C.

By: /s/ Ross T. Johnson  
Ross T. Johnson  
P.O. Box 2325  
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Attorneys for KS Plaintiffs

**ALVIN J. SCHONFELD, D.O., F.A.C.O.I., F.C.C.P.**

**PULMONARY MEDICINE  
OCCUPATIONAL LUNG DISEASE**

438 W. ST. JAMES PLACE  
CHICAGO, IL 60614-2750

June 15, 2018

Kovacich Snipes, P.C.  
ATTN: Mark M. Kovacich, Esq.  
725 Third Avenue North  
Great Falls, MT 59403

**Re: Patient: Lynda M. Hanley-Cole**  
**DOB: 6/2/47**

CT scan of the lower chest and abdomen was performed at Inland Imaging South. The study is dated 4/15/05 and is provided on CD-ROM format.

As noted above, the lungs are included as part of an abdominal CT scan. Nevertheless, the lower halves of the hemithoraces are well visualized.

The lung parenchyma shows some scattered granulomas. No interstitial fibrosis is seen. No lung masses are seen.

The pleural surfaces show obvious areas of bilateral calcified and noncalcified chest wall pleural plaque. There may be a small area of punctate calcification on the right hemidiaphragm but, as noted above, this could also be a peripheral granuloma located just above the right hemidiaphragm. No calcifications are seen on or near the left hemidiaphragm.

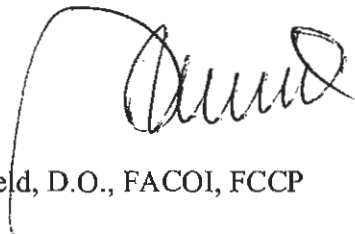
The portions of the upper abdomen that are visualized appear to be unremarkable.

**IMPRESSION:**

1) Bilateral calcified and noncalcified chest wall pleural plaque.

Thank you for sending this study for my review.

Sincerely,



Alvin J. Schonfeld, D.O., FACOI, FCCP  
AJS:hss/mhp

**DIPLOMATE - AMERICAN BOARDS OF INTERNAL MEDICINE AND PULMONARY DISEASE**

**NIOSH B READER**

**FELLOW - AMERICAN COLLEGE OF OSTEOPATHIC INTERNISTS**

**FELLOW - AMERICAN COLLEGE OF CHEST PHYSICIANS**

**RECEIVED**

**JUN 21 2018**

**KOVACICH SNIPES, PC**

**EXHIBIT A**

## **CERTIFICATE OF SERVICE**

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Electronically signed by Dawnell Komac on behalf of Ross Thomas Johnson  
Dated: 09-26-2018